# Refugee Emergency Fund (REF)
# Safeguarding Policy

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| **Policy Focal Point** | Noor Hanisah<br>Fundraising & Partnership Support Officer | **Focal Point Contact** | hanisah@refmalaysia.org<br>+60 17 2872 712 |
| **Last Review Date** | January 6, 2026 | **Approved By** | Hasan Al-Akraa<br>Founder & Director |

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## 1. Purpose and Commitment

Refugee Emergency Fund (REF) is committed to ensuring a safe, respectful, and protective environment for all individuals who engage with or are impacted by our work. This includes people who receive our services, as well as staff, volunteers, donors, partners, and others who work with or support REF. This policy is available on REF's official website.

REF maintains **zero tolerance** for all forms of abuse, exploitation, neglect, harassment, and violence—particularly sexual exploitation and abuse (SEA) and abuse of children. Safeguarding is a shared responsibility and a core organizational value that underpins all REF programs, operations, fundraising activities, and partnerships.

The objectives of this Safeguarding Policy are to:

- Prevent harm, abuse, exploitation, and neglect of children and adults at risk
- Establish clear behavioral standards for all individuals associated with REF
- Ensure safe, confidential, and accessible reporting mechanisms
- Provide a survivor-centered, trauma-informed response to safeguarding concerns
- Define REF's accountability mechanisms, including disciplinary action
- Promote a culture of dignity, respect, and ethical conduct

## 2. Scope of the Policy

This policy applies to all individuals and entities associated with REF, including:

- Clients (people served by REF)
- Staff, consultants, and contractors
- Committee and board members
- Volunteers and interns
- Referral partners and external caseworkers
- Donors and funders

## 3. Key Principles

REF's safeguarding approach is guided by the following principles:

- **Zero Tolerance** – Abuse and exploitation are never acceptable.
- **Do No Harm** – Actions must not increase risk to individuals or communities.
- **Best Interests of the Child** – The child's safety and well-being are of great importance.
- **Survivor-Centered Approach** – Safety, dignity, confidentiality, and choice are prioritized.
- **Accountability** – All safeguarding concerns are taken seriously and acted upon.
- **Confidentiality** – Information is shared strictly on a need-to-know basis.
- **Non-Retaliation** - REF prohibits retaliation against reporters or survivors.


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## 4. Definitions

- **Child:** Any person under the age of 18.
- **Safeguarding:** Proactive measures to prevent and respond to harm, abuse, exploitation, and neglect of children and adults at risk.
- **Sexual Exploitation:** Any abuse of a position of vulnerability, power, or trust for sexual purposes, including exchange of sex for money, assistance, goods, or services.
- **Sexual Abuse:** Actual or threatened sexual activity carried out by force, coercion, or under unequal conditions.
- **Abuse:** Physical, sexual, emotional, or psychological harm.
- **Neglect:** Failure to meet basic needs that results in harm or risk of harm.
- **Adult at Risk:** An individual who may be vulnerable due to age, disability, illness, displacement, dependency, or other factors.
- **Emotional or Psychological Abuse:** Persistent behavior that harms an individual's emotional well-being or sense of self-worth, including intimidation, humiliation, threats, coercion, bullying, discrimination, or controlling behavior.
- **Physical Abuse:** The intentional use of physical force that results in, or has the potential to result in, physical injury or harm, including hitting, slapping, kicking, shaking, or inappropriate restraint.
- **Sexual Harassment:** Any unwelcome sexual advance, request for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature that creates an intimidating, hostile, or offensive environment.
- **Exploitation:** Taking advantage of an individual's vulnerability, power imbalance, or trust for personal, financial, or other gain.
- **Consent:** A freely given, informed, and voluntary agreement to participate in an activity. Consent cannot be given where there is coercion, manipulation, pressure, or a power imbalance, and can be withdrawn at any time.
- **Survivor:** A person who has experienced abuse, exploitation, or harm. The term is preferred over "victim" as it emphasizes agency and resilience.
- **Whistleblower:** A person who reports a safeguarding concern or misconduct in good faith, whether or not they are directly affected by the incident.
- **Safeguarding Concern:** Any suspicion, allegation, disclosure, or observation of abuse, exploitation, neglect, or inappropriate behavior that may place a child or adult at risk.
- **Safeguarding Focal Point:** A designated individual within REF responsible for receiving, documenting, and coordinating responses to safeguarding and PSEA concerns.


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## 5. Code of Conduct

This Code of Conduct sets out the **mandatory behavioral standards** for all individuals covered by this Safeguarding Policy, including staff, volunteers, consultants, board members, external caseworkers, partners, and contractors. Compliance with this Code of Conduct is a **condition of employment, volunteering, partnership, or engagement** with Refugee Emergency Fund (REF).

### Expected Behavior:

All individuals associated with REF must:

- Treat all people with dignity, respect, and fairness
- Maintain clear professional boundaries at all times
- Act in ways that protect the safety, wellbeing, and rights of children and adults at risk
- Obtain informed consent before interviews, photographs, recordings, or sharing stories
- Respect privacy and confidentiality
- Use REF-approved communication channels for work-related contact
- Report safeguarding concerns immediately, even if unsure

### Prohibited Behavior

The following behaviors are strictly prohibited:

- Any sexual activity with children, under any circumstances
- Sexual relationships with REF clients or beneficiaries
- Exchange of money, assistance, goods, favors, or services for sex
- Any form of sexual exploitation, sexual abuse, or harassment
- Discriminatory, degrading, humiliating, or intimidating behavior
- Abuse of power, authority, or position
- Private, unsupervised contact with children outside approved activities
- Private online communication with children
- Sharing personal contact details or engaging in inappropriate personal relationships with beneficiaries

### Professional Boundaries and Appropriate Conduct

All individuals must maintain appropriate professional boundaries at all times. This includes:

- Keeping relationships with clients and beneficiaries professional and role-based
- Avoiding emotional, financial, or personal dependency
- Not accepting or giving personal gifts, money, or favors outside of approved assistance
- Not engaging in private arrangements or assistance outside REF-approved processes
- Conducting home visits, hospital visits, and meetings in a transparent and accountable manner.


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### Online and Digital Boundaries

- Do not engage in private online communication with children
- Avoid excessive personal messaging with clients or beneficiaries
- Do not share personal social media accounts with beneficiaries
- Use REF-approved platforms and channels for work-related communication
- Protect confidentiality when using WhatsApp, email, or digital tools

Any breach of professional boundaries may be treated as a safeguarding concern and addressed under REF's disciplinary procedures.

### Responsibility to Report

- All individuals covered by this policy have a **duty to report** any safeguarding concern, suspicion, or allegation immediately through REF's reporting mechanisms.
- Failure to report a known or suspected safeguarding concern may itself be treated as a breach of this Code of Conduct.
- Retaliation against anyone who reports a safeguarding concern

### Breach of the Code

Any breach of this Code of Conduct will be taken seriously and may result in disciplinary action, including suspension, termination of engagement, or referral to relevant authorities, in line with REF's disciplinary procedures.

## 6. Child Safeguarding Standards

When working with or around children, all personnel must:

- Ensure interactions are visible, appropriate, and accountable
- Avoid one-on-one situations where possible
- Never use physical punishment or humiliating language
- Use age-appropriate, respectful communication
- Obtain guardian consent for participation, interviews, or images
- Never identify children by name, location, or other identifiers in public materials

## 7. Protection from Sexual Exploitation and Abuse (PSEA)

REF strictly prohibits all forms of SEA. All personnel must:

- Never engage in sexual activity with clients
- Never solicit or accept sexual favors
- Never exploit power imbalances
- Report all SEA concerns immediately


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Consent is never valid where there is a power imbalance.

## 8. Adult Safeguarding (Adults at Risk)

REF recognizes that many of the adults we work with may be at increased risk of harm due to displacement, illness, disability, trauma, financial dependence, or unequal power dynamics. REF is committed to protecting adults at risk from abuse, exploitation, neglect, and coercion. All personnel must:

- Treat adults at risk with dignity, respect, and fairness
- Obtain informed consent before providing assistance, collecting information, or sharing stories
- Avoid actions that create dependency or misuse power
- Never exploit financial, emotional, or physical vulnerability
- Report any concerns related to adult safeguarding immediately

Safeguarding responses involving adults at risk will respect autonomy and choice while prioritizing safety and well-being.

## 9. Media, Communications, and Fundraising Safeguards

REF is committed to ethical, respectful, and responsible communications and fundraising. All media and fundraising activities must:

- Obtain verbal or written informed consent before collecting or sharing stories, images, or videos
- Avoid using names, locations, hospitals, schools, or identifying details
- Avoid victimizing, sensational, or misleading portrayals
- Respect dignity, privacy, and agency
- Ensure content reflects accuracy and transparency

Children and adults at risk must never be pressured to share their stories. All materials must be reviewed and approved by the **REF Team** before publication.

## 10. Partner and Third-Party Safeguarding

REF works with external caseworkers, referral partners, service providers, and community members. All partners are expected to uphold REF's safeguarding standards. REF may require partners to:

- Acknowledge and comply with this Safeguarding Policy
- Report safeguarding concerns involving REF-related work
- Cooperate with investigations or corrective actions


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REF reserves the right to suspend or terminate partnerships where safeguarding standards are not met.

## 11. Reporting Procedures

REF is committed to ensuring that safeguarding concerns can be reported **safely, confidentially, and without fear of retaliation**. All reports are taken seriously and handled in a survivor-centered manner.

REF encourages early reporting and consultation. Reporting a concern does not require proof, certainty, or investigation by the reporter. REF will assess concerns appropriately and take action as needed.

### Who Can Report

Safeguarding concerns may be reported by: Staff, Volunteers, Clients, Partner Organizations, Caseworkers, Community Members, Donors, and anyone involved with REF directly or indirectly. Reports may be made **anonymously**.

### What to Report

Report any concern related to:

- Suspected or actual abuse or exploitation
- Sexual exploitation or abuse (SEA)
- Boundary violations or inappropriate behavior
- Concerns involving REF staff, volunteers, contractors, or partners

When in doubt, report the concern rather than deciding it is not serious enough.

### How to Report

Safeguarding concerns can be reported in any of the following ways:

- Complete the REF Safeguarding Incident Reporting Form available on our website, and email it to the Safeguarding Focal Point
- Contact the Safeguarding Focal Point directly to make a verbal report
- Contact the Safeguarding Focal Point to seek guidance or ask questions before submitting a report

All reports will be treated confidentially, with details only known to the Safeguarding team.


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### Safeguarding Focal Point

**Name: Noor Hanisah**
**Email: hanisah@refmalaysia.org**
**Phone / WhatsApp: +60172872712**
Reports may be submitted verbally, in writing, or using the incident reporting form.

### Report Management and Response

The Safeguarding Focal Point will immediately notify the Director, Funds Coordinator, and the Program Strategy & Impact Coordinator for next steps. The REF team will:

- Take immediate steps to ensure the safety of affected individuals
- Treat all reports confidentially and on a need-to-know basis
- Apply a survivor-centered and trauma-informed approach
- Conduct fair, impartial, and timely assessments or investigations
- Provide referrals to medical, psychosocial, or legal support where appropriate
- Document and securely store all safeguarding cases

No action will be taken without the informed consent of the survivor, **except where legal or mandatory reporting obligations apply**.

## 12. Whistleblower and Protection from Retaliation

REF encourages all individuals to report safeguarding concerns in good faith. No one will be penalized, disciplined, or disadvantaged for:

- Raising a safeguarding concern
- Reporting suspected misconduct
- Participating in an investigation

Any form of retaliation, intimidation, or punishment against a whistleblower or survivor is strictly prohibited and will result in disciplinary action.

## 13. Disciplinary Measures and Accountability

Any breach of this Safeguarding Policy, including the Code of Conduct and PSEA obligations, is considered a **serious violation**. REF will respond promptly, fairly, and confidentially, prioritizing the safety and dignity of affected individuals.

### Disciplinary Action

Depending on the severity of the breach, REF may apply one or more of the following:

- Verbal or written warnings


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- Mandatory safeguarding or PSEA retraining
- Suspension from duties pending investigation
- Termination of employment, volunteer engagement, or contractual relationship

In cases involving serious allegations, including sexual exploitation or abuse, REF may impose **immediate suspension or termination** as a precautionary measure.

### Legal and External Reporting

Where abuse, exploitation, or illegal conduct is suspected, REF may:

- Report the matter to the relevant authorities, as required by law
- Cooperate with law enforcement and child protection agencies
- Refer cases to professional or regulatory bodies, where applicable

Such actions may be taken **in parallel with internal disciplinary processes** and do not require the conclusion of internal investigations where immediate risk is present.

### Revocation of Access and Affiliation

REF may take protective action, including:

- Removal of access from  REF premises, programs, or digital platforms
- Suspension or permanent disqualification from REF activities or partnerships

### Partner and Stakeholder Notification

If a breach involves an external party, REF may notify relevant partners or donors and suspend or terminate collaboration as necessary.

### Protection from Retaliation

Retaliation against individuals who report safeguarding concerns in good faith is strictly prohibited and will result in disciplinary action.

## 13. Training and Awareness

### REF staff must:

- Complete mandatory safeguarding and PSEA training upon onboarding
- Attend annual refresher training
- Sign acknowledgment of this policy and the Code of Conduct

### REF volunteers must:

- Receive safeguarding orientation before engagement


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- Follow this policy and Code of Conduct
- Report safeguarding concerns promptly

**External parties working with REF must:**

- Be informed of REF's safeguarding expectations
- Comply with safeguarding requirements relevant to their role
- Report any safeguarding concerns related to REF-supported work

## 14. Monitoring and Review

This policy will be reviewed annually or sooner if required due to:

- Incident trends
- Legal or regulatory changes
- Organizational learning
- Feedback from clients, staff, volunteers, and partners

## 15. Acknowledgment

All individuals covered by this policy must read, understand, and agree to REF's safeguarding practices, Code of Conduct, and the requirements set out in this Safeguarding Policy.

Acknowledgment of this agreement will be obtained through appropriate means, including but not limited to employment or consultancy contracts, volunteer agreements, partner or caseworker registration forms, intake forms, and other relevant REF documentation.

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## Approval and Adoption

This Safeguarding Policy was approved by **Refugee Emergency Fund (REF)** and is effective from the date stated above. Compliance with this policy is mandatory for all individuals.

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## Document Control

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