



THRIVEBRIDGE INITIATIVE

Safeguarding Policy

Table of Contents

Preliminary Information	1
Introduction	1
Purpose	1
Scope	1
Commitment and Purpose of Safeguarding	2
Policy Statement	2
Prevention	3
Enabling reports	5
Response	5
Confidentiality	6
Reporting Obligations	6
Review and Monitoring	6
Training and Capacity Building	6
Acknowledgement and Compliance	6
Community Engagement	6
Cultural Sensitivity	6
Continuous Improvement	7
Associated policies	7
Glossary of Terms	8
Appendix	10
One: Disclosure of Malpractice in the Workplace Policy	10
Two: Complaints policy	14
Three: Contact Details of Safeguarding Lead	16

Preliminary Information

Introduction

Thrivebridge Initiative for Social Development (Thrivebridge Initiative) is a non-governmental organization a dedicated organization committed to empowering young people and women to reach their full potential. We focus on bridging the gap between education and employment by providing essential skills training, capacity development, and support services. Our mission is to create a society where all individuals have equal opportunities to thrive. We achieve this by empowering unemployed graduates, fostering entrepreneurship, and promoting gender equality.

We are committed to safeguarding the well-being of those we serve and protecting them from harm. This policy outlines our commitment to preventing and responding to abuse, exploitation, and harm within our organization and its programs.

Safeguarding at Thrivebridge Initiative means protecting individuals, particularly children and at-risk adults, from harm that may arise from their interaction with our staff, volunteers, or programs. This includes but is not limited to sexual exploitation and abuse, sexual harassment, bullying, and neglect.

This policy applies to all Thrivebridge Initiative Trustees, staff, volunteers, contractors, and partners. It outlines our responsibilities and expectations for ensuring the safety and well-being of those we serve.

Purpose

Thrivebridge Initiative is committed to protecting the safety and well-being of all individuals involved in our programs and activities. This policy aims to prevent and respond to harm, including abuse, exploitation, and neglect, that may arise within our organization.

By establishing clear guidelines and procedures, we seek to create a safe and supportive environment for our beneficiaries, staff, volunteers, and partners.

Scope

This policy applies to all individuals associated with Thrivebridge Initiative, including:

- Staff Trustees
- Board of directors
- Volunteers



- Contractors
- Partners
- Individuals providing services on behalf of Thrivebridge Initiative

This policy covers activities undertaken both within and on behalf of the organization. While we acknowledge the importance of safeguarding issues in the wider community, this policy primarily focuses on safeguarding within the scope of Thrivebridge Initiative's operations.

Commitment and Purpose of Safeguarding

Policy Statement

Thrivebridge Initiative is committed to creating a safe and inclusive environment where everyone feels valued, respected, and protected. Aligned with our mission of empowering young people and women through skills development, economic opportunities, and advocacy for social justice., we strive to achieve our vision of A society where young people and women are economically empowered, resilient, and active contributors to their communities by embodying our core values of Integrity, Equity, Social Justice, Honesty, Responsibility, Inclusive Participation, Professionalism, and Accountability.

We believe that every individual, regardless of age, gender, identity, disability, religion, sexual orientation, or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect, and exploitation.

Thrivebridge maintains a **zero-tolerance** policy towards any form of abuse, including bullying, sexual harassment, and the exploitation of beneficiaries by staff, partners, or associated personnel. This policy encompasses the safeguarding of children, adults, and vulnerable individuals.

We are dedicated to addressing safeguarding issues through a comprehensive approach that includes **prevention, reporting, and response**. Our commitment to Integrity, Equity, Social Justice, Honesty, Responsibility, Inclusive Participation, Professionalism, and Accountability drives our efforts to foster a culture of openness, where individuals feel empowered to report concerns without fear of reprisal.



Prevention

Thrivebridge Initiative responsibilities

Thrivebridge Initiative will:

- Ensure all staff, board of trustees and associated personnel have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with us. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when welcoming volunteers, recruiting, managing and deploying staff and associated personnel.
- Ensure staff and volunteers receive training on safeguarding at a level commensurate with their role and services in the organization.
- Follow up on reports of safeguarding concerns promptly within 24 hours of receipt of such report and according to due process which includes opening of case file, documentation of report, referral where necessary etc.

Staff and associate responsibilities

Child safeguarding

Thrivebridge Initiative Trustees, staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Bully or harass anyone under the age of 18
- Engage in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding

Thrivebridge Initiative Trustees, staff and associated personnel must not:

- Sexually abuse or exploit at-risk adults
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect



- Bully or harass an at-risk adult
- Engage in any commercially exploitative activities with adults including forced labour or trafficking

Protection from sexual exploitation and abuse

Thrivebridge Initiative Trustees, staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Protection from Bullying and Harassment

This policy applies to all forms of bullying and harassment, including:

- Physical violence or threats of violence
- Verbal abuse, name-calling, insults, or offensive jokes
- Intimidation or humiliation
- Social exclusion or isolation
- Spreading rumors or gossip
- Cyberbullying (including through social media and messaging apps)
- Unwanted sexual advances or propositions

Examples:

- Making offensive comments about someone's race, religion, gender or disability.
- Threatening or physically harming someone.
- Excluding someone from social activities or work tasks.
- Sending someone abusive or threatening messages online.
- Making sexual advances.

Our Responsibilities

Thrivebridge Initiative Trustees, staff and associated personnel have a responsibility to create a safe and respectful environment. This includes:

- Treating everyone with dignity and respect.



- Reporting any incidents of bullying or harassment to a designated person.
- Supporting those who have been bullied or harassed.
- Additionally, Thrivebridge Initiative staff and associated personnel are obliged to:
- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by Thrivebridge Initiative Trustees, staff or associated personnel to the appropriate designated safeguarding personnel.

Enabling reports

Thrivebridge Initiative will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, associated personnel, trustees and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels will be protected by Thrivebridge Initiative's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy. Policy in annex 1

Thrivebridge Initiative will also accept complaints from external sources such as Trustees of the public, partners and official bodies. Complaint policy in annex 2

How to report a safeguarding concern

Staff Trustees, trustees and volunteers who have a complaint or concern relating to safeguarding should report it immediately to the safeguarding officer. If the staff member/volunteer does not feel comfortable reporting to their Safeguarding officer (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate authority. For example, this could be a board of trustee member.

Response

Thrivebridge Initiative will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (Procedures for reporting and response to safeguarding concerns in Appendix Four).

Thrivebridge Initiative will apply appropriate disciplinary measures to staff, and volunteers found in breach of policy including suspension, dismissal, warnings, litigation and prosecution, blacklisting of erring associate etc. as applicable.



Thrivebridge Initiative will offer support to survivors (psychosocial, financial, capacity building, family integration, medical, etc.) of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out such as an internal investigation. Decisions regarding support will be led by the survivor.

Confidentiality

Thrivebridge Initiative will maintain optimum confidentiality at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need-to-know basis only and will be kept secure at all times.

Reporting Obligations

Thrivebridge Initiative is committed to reporting allegations or incidents to relevant authorities including Police, Traditional Rulers, NAPTIP, Social Welfare, and relevant state apparatus as required by law.

Review and Monitoring

This policy shall be reviewed biennially to ensure its effectiveness and relevance. Monitoring mechanisms shall be put in place to identify areas for improvement in the organization's Safeguarding practices.

Training and Capacity Building

All Thrivebridge Initiative Trustees, staff and associated personnel shall be provided with periodic and ongoing training in order to increase awareness about safeguarding issues. This is with a view to building their capacity for prevention and response purposes.

Acknowledgement and Compliance

It is mandatory that all individuals associated with Thrivebridge Initiative read, understand and sign an acknowledgement of the safeguarding policy as a sign of commitment.

Community Engagement

Community Trustees as well as programme participants shall be involved in the development and implementation of safeguarding measures thereby fostering collaborative approach towards keeping everyone safe.

Cultural Sensitivity

This policy is developed in consideration of cultural nuances and sensitivities, and this will be



taken into consideration during implementation in the course of our work. This is to ensure that they are effective and respectful in all areas of our work.

Continuous Improvement

This policy shall continuously be improved upon taking into consideration the feedback and lessons learned from safeguarding incidents.

Associated policies

- Code of Conduct. Other policies will be developed as appropriate.
- Personnel Policy

Glossary of Terms

Associated Personnel: volunteers, partners, contractors, vendors, special guardians (foster parents) etc. whilst engaged with work or visits related to Thrivebridge Initiative.

At risk adult: Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Beneficiary of Assistance: Someone who directly receives aids or services from Thrivebridge Initiative's programme. Note that misuse of power can also apply to the wider community that Thrivebridge Initiative serves, and also can include exploitation by giving the perception of being in a position of power.

Bullying: Bullying is repeated, unreasonable behavior directed towards an individual or group, with the intention of causing them distress or discomfort.

Child: A person below the age of 18

Harassment: Harassment is any unwanted behavior that is offensive, intimidating, degrading, or creates a hostile environment. It can be similar to bullying, but harassment can be broader and doesn't necessarily involve a power imbalance.

Harm: Psychological, physical and any other infringement of an individual's rights

Protection from Sexual Exploitation and Abuse (PSEA): The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Psychological harm: Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation, negative comparison with others

Safeguarding: At Thrivebridge Initiative, safeguarding means Safeguarding means taking all reasonable steps to prevent Sexual Exploitation Abuse and Harassment (SEAH) and other forms of harm from occurring and to respond appropriately when harm does occur. The harm may be caused by a staff member (or associate), the organisation's programmes or operations. Or more simply: We do not harm people who come into contact with us.

This definition draws from our values and principles and shapes our culture. Safeguarding applies consistently and without exception across our programmes, associated personnel,



partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty. Safeguarding puts treasures, and victim/survivor beneficiaries and affected persons at the centre of all we do.

Sexual abuse: The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation: The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Shelter: Is a temporary residence provided for rescued Treasures before they are reunited with their families.

Survivor: The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Thrivebridge Initiative: Thrivebridge Initiative for Social Development



Appendix

One: Disclosure of Malpractice in the Workplace Policy

Purpose

At Thrivebridge Initiative, it is vital that everyone who works for us maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. If an employee, volunteer, partner, consultant or contractor has any genuine concerns about malpractice in the workplace, we wish to encourage them to communicate these without fear of reprisals and in the knowledge that they will be **protected from victimization and dismissal**.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

Malpractice includes (but is not limited to) the issues listed below:

- Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
- A failure to comply with any legal obligations
- Sexual misconduct, including sexual abuse, harassment or exploitation (see Thrivebridge Initiative Safeguarding Policy)
- Abuse or exploitation of children, vulnerable adults or beneficiaries (see Thrivebridge Initiative Safeguarding Policy as above)
- Breach of Thrivebridge Initiative policy
- Abuse of position
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behaviour
- Activity which would bring the organisation into serious disrepute
- The deliberate concealment of information relating to any of the matters listed above

If you have a genuine concern and have a reasonable belief it is in the public interest, even if it is later discovered that you are mistaken, under this policy you will not be at risk of losing your job or from suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they



know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously will have disciplinary action taken against them.

Malpractice is not a complaint about the performance and behaviour of a manager or other work colleague towards you. Such complaints will be directed for action to Thrivebridge Initiative's HR policies and procedures.

If you genuinely believe that the actions of someone who works for Thrivebridge Initiative could lead to or has resulted in malpractice, please follow the procedure below.

Please note this procedure is not intended to replace THRIVEBRIDGE INITIATIVE's Grievance Procedures, which continues to be the appropriate way to raise personal issues relating to the specific job or employment.

1. Raise the matter with your line manager, who will consult with the appropriate contact point. If you feel that you are unable to raise the matter with your line manager, and you are able to, raise it with a more senior manager. At the point of raising a concern it would be useful for you to share information describing:
 - Whether anyone is at immediate risk of harm?
 - What happened? If possible, make note of dates, times, places, people.
 - Who is involved?
 - How do you know about it?
 - When were you first concerned about it?
 - Have you told anybody about it?
 - Was any action taken?

All managers should:

Report incidents of theft, fraud, or corruption immediately to Thrivebridge Initiative's Fraud and Corruption lead

Report Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any Thrivebridge Initiative representative to Thrivebridge Initiative's Safeguarding lead

Report any other incidents of malpractice in the workplace to your HR team, or to the Head of Human Resources

A decision will be made on whether it is appropriate to handle such complaints under



this policy. Where not appropriate the complainant will be informed and their permission sought to divert the issue to the appropriate HR procedure.

When matters are reported to the Fraud and Corruption lead, Thrivebridge Initiative's Fraud and Corruption policy will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

When matters are reported to the Safeguarding lead, Thrivebridge Initiative's Safeguarding Investigation Guidelines will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

You will be notified once the matter has been resolved, but outcomes are subject to confidentiality and may not be communicated.

Thrivebridge Initiative will take appropriate action, which may end in dismissal, in accordance with the relevant procedure against any employee, volunteer or consultant who:

Has been found to be victimising another individual for using this procedure or deterring them from reporting genuine concerns under it.

Made a disclosure maliciously that is known to be untrue or without reasonable grounds for believing that the information supplied was accurate.

Frequently asked questions

What if the line manager is involved in the alleged malpractice in some way?

If the line manager is involved in the alleged malpractice in some way, the matter should be raised with the next senior manager in the management line. Concerns regarding financial wrongdoing may be raised directly with the Fraud and Corruption lead and concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any Thrivebridge Initiative representative to the Safeguarding lead.

Can the disclosure be made anonymously?

You are strongly encouraged not to make anonymous disclosures as details and further concerns cannot then be checked with you and this may seriously limit the



ability of investigators to pursue your concerns. Nonetheless, all disclosures, made anonymously or otherwise, will be reviewed but lack of information may limit the nature, extent and outcome of the investigation.

Who will conduct the investigation?

Normally an independent person from within Thrivebridge Initiative will be appointed. On rare occasions, or for complex cases such as safeguarding, external investigation support may be sought.

What if the matter involves a criminal offence?

The issue may also be reported to the police if it is a criminal offence, such as fraud or theft, or sexual assault has been committed.

What if the matter is a complaint about the performance or behaviour of a manager or colleague against me?

Such complaints will be directed to the Liaison HR for action unless the concerns relate to concerns of sexual misconduct or other forms of malpractice listed in this policy.



Two: Complaints policy

Policy statement

Receiving feedback and responding to complaints is an important part of improving Thrivebridge Initiative's accountability. Realizing our stakeholders can hold us to account will improve the quality of our work in all areas.

Scope

This policy applies to Thrivebridge Initiative and is global in its application. A complaint can be made by any supporter, partner organisation, community or individual/member with whom we work, or any member of the public whether an individual, company or other entity, in Nigeria.

Definitions

A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action, by Thrivebridge Initiative or its staff and associated personnel. It is a criticism that expects a reply and would like things to be changed. Complaints could include the following but not limited to:

- Concern from someone we work with about the quality of programme delivery
- Concern from a member of the public or supporter about a particular fundraising approach or campaign action.
- Concern about the behaviour of staff or associated personnel

A complaint has to be about some action for which Thrivebridge Initiative is responsible or is within our sphere of influence.

- A complaint is not:
- A general inquiry about Thrivebridge Initiative's work.
- A request for information
- A contractual dispute
- A request to amend records e.g. to correct an address, cancel a donation
- A request to unsubscribe from Thrivebridge Initiative service e.g. a campaign newsletter or email



The complaints procedures do not apply to complaints that are subject to current investigation by any regulatory body or other legal or official authorities in Nigeria where we operate. Such issues will be dealt with by the relevant regulatory body.

Procedures for making a complaint

It is hoped that most complaints or concerns about Thrivebridge Initiative's work or behaviour can and will be dealt with informally by Trustees, staff or volunteers at a local level. However, it is recognised that not all issues can be resolved in this way and that a formal complaints mechanism is required for those occasions when an individual or organisation wishes to make their complaint a matter of record and to receive a formal response.

How to make a complaint

All formal complaints should be made in writing either directly from the individual or organisation making the complaint or via someone acting on their behalf. See below for details about whom to address a complaint.

Who can make a complaint?

This policy is global in application. A complaint can be made by:

- Any supporter
- Associated Partners
- Community or individual with whom we work
- Any member of the public whether an individual, company or other entity in the Nigeria.

Who is not covered by this policy?

Complaints by staff are governed by Thrivebridge Initiative's procedures for dealing with problems in the workplace, and Anti Bullying and Harassment policy. Complaints relating to serious incidents such as fraud and corruption or safeguarding concerns will be dealt with through the relevant policy and procedures.



Three: Contact Details of Safeguarding Lead

Ibijoke Akerele (PhD): Safeguarding Focal Person - 08063478563

Mofoyeke Omole: Executive Director - 08060681541

Whistle Blowing Email: complaints@thrivenigeria.org

