



TUNISIAN INSTITUTE FOR PEACE AND CONFLICT STUDIES

POLICY DOCUMENT · TIPCS-POL-02

Safeguarding and protection from sexual exploitation, abuse and harassment

Child protection, adults at risk, PSEA, sexual harassment and survivor-centred case management – Version 1.0, 25 October 2026

This policy commits TIPCS to zero tolerance of sexual exploitation, abuse and harassment and of inaction. It sets binding rules of conduct for everyone acting for TIPCS, prevention measures (safer recruitment, risk assessment, research, online and image safeguards), a duty to report within 24 hours, Tunisian referral pathways, and a survivor-centred case-management procedure with fixed time limits (acknowledgement within 3 working days, assessment within 7 days, investigation normally within 60 days), reporting to the authorities and notification of donors.

TIPCS-POL-02 · Version 1.0 · 25 October 2026

Issued by the Secretary General · ratified by the Board of Directors · legally reviewed

Questions and concerns: Contact@tipcs.org · www.tipcs.org

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1. Purpose and policy statement

The Tunisian Institute for Peace and Conflict Studies (TIPCS) works with people affected by conflict, violence, exclusion and insecurity, including young people, displaced persons, survivors of violence and members of marginalised communities. Its research, training, dialogue and events bring TIPCS personnel into contact with people who may be in a position of vulnerability or dependence. TIPCS recognises that this contact carries a risk of harm, and that an organisation devoted to peace must above all do no harm.

This policy sets out how TIPCS prevents, detects, reports and responds to sexual exploitation, sexual abuse and sexual harassment (SEAH), child abuse, abuse of adults at risk, trafficking and any other form of physical, psychological, sexual or economic harm or neglect caused by anyone connected with its work. It turns the summary published on the TIPCS website into binding rules, procedures, time limits and forms.

TIPCS applies zero tolerance to sexual exploitation, sexual abuse and sexual harassment, and zero tolerance to inaction: every concern must be reported, and every report must be taken seriously and handled under this policy.

The objectives of this policy are to: (a) protect children, adults at risk, participants, staff and partners from harm; (b) set clear standards of behaviour for everyone acting for TIPCS; (c) build safe activities through risk assessment and safer recruitment; (d) provide safe, accessible and confidential ways to raise concerns; (e) guarantee a prompt, survivor-centred and fair response; and (f) meet TIPCS's obligations under Tunisian law and towards its donors and partners.

2. Scope

2.1 Persons covered

This policy binds every person who acts for or on behalf of TIPCS, referred to in this policy as "TIPCS personnel", whatever the nature or duration of their engagement:

- the Chairperson, Vice-Chairperson, Secretary General, Treasurer and all members of the Board;
- members of the Executive team and of all departments, including the Research department and the Academy;
- employees, interns, volunteers, associate researchers, trainers, experts and consultants;
- members of the association when they take part in or represent TIPCS activities;
- partners, sub-grantees, suppliers, interpreters, drivers and service providers, to the extent set out in their contracts and in section 8.2.

2.2 Activities and settings covered

The policy applies to all TIPCS activities in Tunisia and abroad, in person and online: research and fieldwork (surveys, interviews, focus groups, observation), Academy courses and training, workshops, conferences and public events, dialogue and mediation activities, publications and communications, social media and digital platforms, travel and accommodation organised by TIPCS, and the workplace itself. It applies both during working hours and outside them whenever a person's conduct is connected with TIPCS or affects people TIPCS works with.

2.3 Persons protected

The policy protects everyone who comes into contact with TIPCS: children, adults at risk, research participants and interviewees, trainees, event participants, community members, TIPCS personnel themselves and the personnel of partner organisations. Sexual harassment between colleagues is covered in the same way as harm to participants.

3. Definitions

For the purposes of this policy, the following definitions apply. They are drawn from the UN and Inter-Agency Standing Committee (IASC) definitions and are applied without prejudice to the definitions of Tunisian criminal law, which remain decisive for any criminal proceedings.

Term	Definition
Safeguarding	All measures TIPCS takes to prevent harm to people arising from contact with its personnel, activities or programmes, and to respond appropriately when harm occurs.
Child	Any person under 18 years of age, regardless of the age of majority or of consent in any country, and regardless of marital status.
Adult at risk	A person aged 18 or over who is unable, temporarily or permanently, to protect themselves from harm or exploitation because of age, illness, disability, displacement, detention, dependence, poverty, trauma, conflict or similar circumstances.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.
Sexual abuse	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
Sexual harassment	Any unwelcome conduct of a sexual nature, verbal, non-verbal, physical or online, that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, including requests for sexual favours. It is also a criminal offence under article 226 ter of the Penal Code.
Child abuse	Any physical, emotional or sexual abuse, neglect, exploitation (including online) or exposure to violence that harms or is likely to harm a child's health, development or dignity.
Survivor	A person who has experienced, or is alleged to have experienced, abuse or harm covered by this policy. The term "victim" is used where the law requires it.
Subject of concern	The person whose conduct is the subject of a report. They are presumed innocent until a finding is made.
Concern / report	Any information, suspicion, disclosure or allegation, however received, indicating that harm covered by this policy has occurred, is occurring or may occur.

4. Guiding principles

TIPCS applies the following principles in every decision taken under this policy:

- Best interests of the child: in every matter affecting a child, the child's best interests are the primary consideration, and the child's views are heard according to age and maturity.
- Survivor-centred approach: the safety, dignity, wishes and well-being of the survivor guide every step; survivors are informed, consulted and never forced to take part in a process.
- Do no harm: no action, including an investigation or a publication, may expose a person to further risk.
- Confidentiality: information is shared strictly on a need-to-know basis.
- Fairness and due process: the subject of concern is presumed innocent, informed of the allegations at the appropriate time and given the opportunity to respond.

- Non-discrimination and inclusion: protection is provided equally to all, whatever their sex, age, disability, origin, nationality, legal status, religion, opinion or any other status.
- Accountability and proportionality: TIPCS is accountable to the people it works with, to its members and to its donors, and its measures are proportionate to the risks of each activity.

5. Legal and standards basis

This policy implements, and must be read consistently with, the following Tunisian legislation and international standards. Where this policy is stricter than the law, the policy applies to TIPCS personnel as a contractual and statutory obligation; where the law is stricter, the law prevails.

Instrument	Relevance to this policy
Child Protection Code, promulgated by Law No. 95-92 of 9 November 1995	Article 31 imposes on everyone, including persons bound by professional secrecy, a duty to report to the child-protection delegate any situation that threatens a child's health or physical or moral integrity; the Code establishes the child-protection delegates.
Organic Law No. 2017-58 of 11 August 2017 on the elimination of violence against women	Defines physical, moral, sexual, political and economic violence against women, provides for protection measures and specialised units, and strengthens criminal sanctions, including for sexual harassment.
Organic Law No. 2016-61 of 3 August 2016 on preventing and combating trafficking in persons	Criminalises trafficking, including sexual exploitation and the exploitation of children and persons in a situation of vulnerability.
Penal Code, including article 226 ter (sexual harassment, introduced by Law No. 2004-73 of 2 August 2004) and the provisions on sexual offences	Criminal offences that may be committed by subjects of concern and must be reported to the competent authorities under section 10.6.
Labour Code	Framework for disciplinary measures concerning employees and for a safe working environment.
Organic Law No. 2004-63 of 27 July 2004 on the protection of personal data	Governs safeguarding records, including written consent (art. 27), children's data (art. 28), criminal-record data (art. 13) and health data (art. 14); supervised by the INPDP.
Decree-Law No. 2011-88 of 24 September 2011 on associations	Legal framework of TIPCS, its governance bodies and its accountability obligations.
UN Convention on the Rights of the Child (1989), ratified by Tunisia	Definition of the child (art. 1), best interests (art. 3), participation (art. 12), privacy (art. 16), protection from violence (art. 19) and from sexual exploitation (art. 34).
UN Secretary-General's Bulletin ST/SGB/2003/13 and the IASC Six Core Principles relating to Sexual Exploitation and Abuse (2019)	Source of the PSEA rules of conduct in section 7.
UN Protocol on Allegations of Sexual Exploitation and Abuse involving Implementing Partners (2018)	Minimum PSEA capacity and reporting expected by UN partners.
Core Humanitarian Standard on Quality and Accountability (CHS) and the Keeping Children Safe international child safeguarding standards	Good-practice benchmarks for complaints mechanisms, safeguarding governance and partner due diligence.

Donor agreements (European Union, UN agencies, foundations and others) may contain additional safeguarding obligations. Where they do, those obligations are binding for the project concerned and prevail over this policy to the extent that they are stricter.

6. Roles and responsibilities

Role	Responsibilities
Board	Adopts this policy and its revisions; ensures that adequate resources are allocated; receives the annual anonymised safeguarding report; oversees cases involving officers; decides on sanctions against Board members within the limits of the statutes.
Chairperson	Acts as alternate safeguarding focal point for any report concerning the Secretary General; ensures that no officer handles a case in which they are involved.
Vice-Chairperson	Replaces the Chairperson where the Chairperson is absent or has a conflict of interest.
Secretary General (safeguarding focal point)	Issues and implements this policy; receives and registers reports; leads case management; refers to authorities and services; notifies donors; organises training; keeps the confidential safeguarding register; may designate, in writing, trained deputy focal points from the Executive team; reports annually to the Board.
Treasurer	Ensures that safeguarding costs (training, support to survivors, external investigation) are budgeted and that partner funding is released only after the safeguarding checks in section 8.2.
Executive team and heads of department (including Research and the Academy)	Carry out risk assessments for their activities; appoint an activity focal point; ensure that personnel are briefed and have signed the commitment declaration; report concerns without delay.
All TIPCS personnel	Comply with the code of conduct; complete training; report any concern immediately; cooperate with case management while respecting confidentiality.
Partners, consultants and suppliers	Apply equivalent standards; report to TIPCS any concern linked to TIPCS-funded or joint activities within 24 hours of becoming aware of it.

Nobody may handle, investigate or decide on a case in which they are the subject of concern, a witness, a relative or close associate of a party, or otherwise conflicted. Such a person must declare the conflict and withdraw immediately.

7. Code of conduct

The following rules are mandatory. A breach is serious misconduct, whether or not it is also a criminal offence, and whether it occurs during working hours or not.

7.1 Protection from sexual exploitation and abuse (PSEA)

- Sexual exploitation and sexual abuse are prohibited and are grounds for termination of any engagement with TIPCS.
- Sexual activity with a child is prohibited regardless of the local age of consent. A mistaken belief about the child's age is not a defence.

- Exchanging money, employment, goods, services, grades, certificates, references, research participation fees or any other advantage for sex or sexual favours, or any other humiliating, degrading or exploitative behaviour, is prohibited.
- Sexual or romantic relationships with participants, interviewees, trainees or beneficiaries, or with any person over whom one has supervisory or evaluative authority, are prohibited, because they rest on inherently unequal power dynamics.
- Anyone who develops concerns or suspicions about SEA by a colleague, whether or not within TIPCS, must report them through the channels in section 9.
- Managers and officers must create and maintain an environment that prevents SEA and must lead by example.

7.2 Conduct towards children

- Never be alone with a child in a closed or isolated space during TIPCS activities; keep doors open, remain in sight of another adult, or ensure that a second adult is present.
- Do not transport a child alone, invite a child to your home, or share accommodation with a child, except a member of your own family.
- Do not use physical punishment, threats, humiliation or language that is sexualised, abusive or discriminatory.
- Do not contact children privately through personal phones, messaging applications or social media; all communication goes through parents, guardians or institutional channels.
- Involve children only with the written consent of a parent or legal guardian and the child's own assent, and only where their participation is necessary and safe.

7.3 Conduct towards adults at risk

- Respect autonomy: adults at risk are entitled to make their own decisions; support them to do so and do not decide for them unless the law allows it.
- Never take advantage of a person's dependence, displacement, legal status, poverty or trauma, and never make assistance, participation or payment conditional on anything other than the published criteria.
- Adapt communication, venues and consent procedures to persons with disabilities, persons with limited literacy and persons who do not speak the working language.

7.4 Sexual harassment and a respectful workplace

Sexual harassment is prohibited in all its forms, including unwelcome comments, jokes, gestures, physical contact, persistent invitations, display or sending of sexual material, online stalking, and any request for sexual favours, particularly where it is linked, explicitly or implicitly, to recruitment, contract renewal, promotion, grades, publication or participation. Bullying, humiliation, discrimination and retaliation are equally prohibited. Officers and managers who become aware of harassment must act, even in the absence of a formal complaint.

8. Prevention

8.1 Safer recruitment

TIPCS shall apply the following steps to every recruitment or engagement of personnel, proportionate to the level of contact with children and adults at risk:

1. Vacancy notices and terms of reference state TIPCS's commitment to safeguarding and that candidates will be screened accordingly.
2. Interviews include at least one question on safeguarding values and behaviour.
3. Identity is verified, and at least two references are obtained, one of which from the most recent employer or supervisor; referees are asked explicitly whether they have any safeguarding concern about the candidate.

4. For any role involving regular or unsupervised contact with children or adults at risk, an extract of the criminal record (bulletin n° 3) is requested from the candidate, where the law allows. It is viewed, recorded as seen and returned or destroyed, without being copied into the personnel file.
5. Before starting, every person signs the safeguarding commitment declaration (Annex D) and receives induction on this policy.
6. Employment contracts, consultancy contracts and volunteer agreements include a clause making compliance with this policy a contractual obligation and a breach a ground for termination.

TIPCS shall not knowingly re-hire or engage a person who was dismissed, or who resigned during an investigation, for substantiated SEAH. Where lawful and requested, TIPCS may participate in inter-agency reference-checking schemes on misconduct, subject to Organic Law 2004-63.

8.2 Partners, consultants and suppliers

Before any funds, data or access to participants are given, TIPCS shall (a) assess the safeguarding capacity of the partner through the due-diligence questions in its partner selection process, proportionate to the risk; (b) obtain the partner's written acceptance of this policy or of equivalent standards; (c) include in the agreement clauses on safeguarding, reporting to TIPCS within 24 hours, cooperation with investigations, and termination for breach; and (d) agree a plan to strengthen capacity where gaps are found. Short-term suppliers in contact with participants (drivers, interpreters, venue staff) shall be briefed and sign a short code of conduct.

8.3 Risk assessment of activities

A written safeguarding risk assessment (Annex B) is mandatory before any activity that involves children, displaced persons, migrants or refugees, survivors of violence, persons deprived of liberty, persons with disabilities or other at-risk groups, any fieldwork in conflict-affected or insecure areas, any residential activity, and any online activity open to minors. The head of the department concerned prepares it, names an activity focal point, and submits it to the Secretary General, who approves it, requests changes or refuses the activity. Activities assessed as high risk after mitigation may proceed only with the Secretary General's written approval and a reinforced supervision plan. Risk assessments are reviewed whenever the context changes.

8.4 Research and fieldwork

- Informed consent: participants receive, in a language and format they understand, clear information on the purpose of the research, how data will be used, risks, and their right to refuse or withdraw at any time without consequence. Consent is recorded in writing or, where writing would create risk or is impractical, recorded orally and documented by the researcher.
- Children take part in research only where necessary, with parental or guardian consent and the child's assent; processing of children's personal data must comply with article 28 of Organic Law 2004-63.
- Trauma-informed practice: no one is pressed to recount traumatic experiences; interviews on violence are conducted by trained researchers, in private and safe settings, with breaks offered and a referral list of support services at hand.
- Researchers explain at the start of each interview the limits of confidentiality: if a child or another person is at risk of serious harm, the researcher must report it.
- Compensation for participation is modest, transparent and never conditional on the content of answers.
- Fieldwork teams receive a safeguarding briefing before deployment, work in pairs where risks are elevated, and carry the local referral pathway (section 9.5).

8.5 Online safeguarding

- Online sessions use TIPCS institutional accounts, with waiting rooms, host controls and at least two TIPCS hosts where participants include children or adults at risk.
- Sessions are recorded only with prior notice and consent; recordings are stored securely and deleted when no longer needed.
- No private one-to-one messaging with children; no friend or follow requests to participants from personal accounts.
- Online harassment, sharing of intimate images without consent, grooming and any exposure of participants to sexual content are safeguarding concerns and must be reported under section 9.

8.6 Images, stories and consent

TIPCS communicates with dignity and accuracy. No photograph, video, audio recording, quotation or personal story of an identifiable person may be taken or published without their informed written consent (Annex C), and, for a child, the written consent of a parent or legal guardian together with the child's assent. Consent may be withdrawn at any time for future use. In addition, regardless of consent:

- never publish the full name, school, exact location or other identifying details of a child or of a survivor of violence;
- never show people in degrading, sexualised or victimising poses, nor children partially dressed;
- blur faces or use pseudonyms where publication could expose a person to retaliation, stigma or legal risk;
- use only TIPCS devices or approved storage for images of participants, and delete images from personal devices after transfer.

8.7 Events, Academy courses and travel

For events and courses, TIPCS shall display or announce how to raise a safeguarding concern, designate an on-site focal point, ensure safe and accessible venues, arrange separate accommodation for minors with appropriate adult supervision, and require the written consent of a parent or guardian for minors attending residential activities or travelling with TIPCS.

9. Reporting a concern

9.1 Duty to report

All TIPCS personnel must report immediately, and in any case within 24 hours, any concern, suspicion, disclosure or allegation of conduct covered by this policy, even if they are unsure, even if the information is second-hand, and whoever the person concerned may be. It is not the role of the person reporting to investigate or to decide whether abuse has occurred. Failure to report is itself a breach of this policy. Concerning children, this internal duty is in addition to the legal duty of every person under article 31 of the Child Protection Code to alert the child-protection delegate.

9.2 Reporting channels

- To the safeguarding focal point (the Secretary General) in person, by phone on the numbers listed on the TIPCS Contact page, or by email to Contact@tipcs.org with the subject line "CONFIDENTIAL – Safeguarding".
- If the concern involves the Secretary General, to the Chairperson (or, if the Chairperson is also involved or conflicted, to the Vice-Chairperson), through the same channels marked "For the attention of the Chairperson".
- Through the confidential channel of the TIPCS Whistleblowing and complaints policy.
- To the activity focal point or any manager during an activity, who must pass the report to the safeguarding focal point the same day.

Anyone, inside or outside TIPCS, including participants, community members and partner personnel, may report. Reports may be made orally or in writing, in Arabic, French or English, and may be anonymous; anonymous reports are assessed in the same way, although the ability to follow up may be limited. The report form in Annex A may be used but is not required.

9.3 When someone discloses to you

Do	Do not
Stay calm, listen and take the person seriously.	Show disbelief, shock or blame, or minimise what is said.
Reassure the person that they were right to speak.	Promise total secrecy; explain instead who will need to know.
Let them speak freely; ask only open questions needed to understand immediate safety.	Interview in detail, ask leading questions, or ask them to repeat the account to others.
Write down, as soon as possible, what was said in the person's own words, with date and time, and sign it.	Confront the subject of concern, gather evidence or inform others yourself.
Report to the safeguarding focal point immediately.	Delay reporting or discuss the case on social media or with colleagues.

9.4 Immediate danger

If a person is in immediate danger or needs urgent medical care, call the emergency services first, then inform the safeguarding focal point: Police 197; National Guard 193 (outside urban police areas); Civil Protection 198; SAMU (emergency medical service) 190.

9.5 Referral pathways in Tunisia

The safeguarding focal point shall maintain an up-to-date referral directory for each governorate where TIPCS works, verified at least once a year and before each fieldwork mission. Referral to a service is made only with the informed consent of the survivor (or of the parent or guardian for a child, unless the parent or guardian is the source of the risk), except where the law requires a report.

Situation	Service	Contact
Immediate threat to life or safety	Police / National Guard	197 / 193
Medical emergency, injury, sexual assault requiring care	SAMU; Civil Protection; nearest public hospital emergency department	190 / 198
Child at risk or abused	Child-protection delegate (délégué à la protection de l'enfance) of the governorate, Ministry in charge of children; national child helpline	1809 (free line, 24/7); delegate's office in the governorate
Violence against a woman, including sexual violence and harassment	Ministry in charge of women: national helpline; specialised units for violence against women of the internal security forces; public prosecutor	1899 (free line)
Suspected trafficking	National Authority for Combating Trafficking in Persons; Police / National Guard; public prosecutor	Per referral directory; 197 / 193

Situation	Service	Contact
Psychosocial, legal or shelter support; refugees and migrants	Specialised public services and civil-society organisations listed in the referral directory	Per referral directory

10. Case-management procedure

Every report is handled according to the following procedure, which is survivor-centred, confidential and documented. The checklist in Annex E is used to record each step. Time limits run from receipt of the report by the safeguarding focal point.

10.1 Steps and time limits

Step	Action	Time limit
1. Immediate safety	Ensure the survivor and others are safe; call emergency services if needed; secure medical care (ideally within 72 hours after a sexual assault); offer psychosocial support.	Immediately, same day
2. Registration	Record the report in the confidential safeguarding register with a case number; open a restricted case file.	Within 1 working day
3. Acknowledgement	Acknowledge receipt to the person reporting (if known), explaining next steps and confidentiality.	Within 3 working days
4. Initial assessment	Assess whether the matter falls under this policy, its severity and risk level (10.2), legal reporting duties, interim measures and the appropriate route: no further action, informal resolution (only for low-level conduct not involving children or SEA), referral, or investigation.	Within 7 calendar days (24 hours for high risk)
5. Authorities and donors	Report to the child-protection delegate or public prosecutor where required (10.6); notify donors as required (section 11).	Without delay; per law and agreements
6. Investigation	Appoint an impartial, trained investigator (external where TIPCS lacks capacity or there is a conflict); agree written terms of reference; conduct interviews; collect evidence; prepare a report on the balance of probabilities.	Normally within 60 days
7. Decision	The decision-maker (10.5) decides on the findings and on disciplinary or contractual measures and on support and prevention measures.	Within 10 working days of the report
8. Communication and closure	Inform the survivor and the subject of concern of the outcome to the extent appropriate; record lessons learned; close the file.	Within 5 working days of the decision

Where a time limit cannot be met, for example because of a criminal investigation or the survivor's request for a pause, the reason is recorded and the survivor and the person reporting are kept informed.

10.2 Risk-level matrix

Level	Examples	Required response
High	Any allegation involving a child; sexual abuse or exploitation; trafficking; risk of serious harm or of repetition; allegation against an officer.	Assessment within 24 hours; interim measures; report to authorities where required; formal investigation; Board informed (anonymised) if an officer is involved.

Level	Examples	Required response
Medium	Sexual harassment of an adult; inappropriate contact with participants; breach of image or online rules causing harm.	Assessment within 7 days; investigation or fact-finding; protective measures as needed.
Low	Isolated procedural breach without harm (e.g. missing consent form later regularised).	Assessment within 7 days; corrective action, guidance or training; recorded.

10.3 Survivor-centred measures

- The survivor is informed of their options, of the services available and of any mandatory reporting, and their informed choices are respected wherever the law allows.
- The survivor may be accompanied by a person of their choice and may ask to be interviewed by a person of the gender they prefer, in their language.
- The survivor is not asked to repeat the account more often than necessary and is never confronted with the subject of concern.
- TIPCS shall, within its means and the budget foreseen in section 6, facilitate access to medical, psychosocial, legal and safety support, whether or not an investigation takes place and whatever its outcome.
- Where the survivor is TIPCS personnel, reasonable adjustments (leave, change of supervisor or workplace) are offered without loss of pay or status.

10.4 Interim measures and rights of the subject of concern

Where necessary to protect people or the integrity of the process, the Secretary General (or the Chairperson where the Secretary General is involved) may order interim measures: suspension with pay, removal from contact with participants, restriction of access to systems or premises, or suspension of a partner's activities. Interim measures are not a sanction. The subject of concern is informed of the allegations at a point that does not endanger the survivor or the evidence, may be accompanied, may respond and present evidence, and is informed of the outcome. Confidentiality protects them as well.

10.5 Investigation and decision

Investigations are fact-finding, not criminal proceedings; findings are made on the balance of probabilities. Where a criminal investigation is opened, TIPCS shall coordinate with the authorities and shall not take any step that could prejudice it. The investigator's report is submitted to the Secretary General, who decides on measures concerning staff, volunteers, consultants and partners. Where the Secretary General is involved or conflicted, or where the subject of concern is a Board member or officer, the decision is taken by the Board, without the participation of the person concerned, in accordance with the statutes.

10.6 Reporting to the authorities

- Any situation threatening a child is reported to the child-protection delegate, as required by article 31 of the Child Protection Code, and, where the facts may constitute an offence, to the public prosecutor. This applies even without the consent of the child or of the parents.
- Where the facts concerning an adult suggest a criminal offence, TIPCS shall report to the competent authorities with the informed consent of the survivor, unless the law requires otherwise or there is a serious risk to others; the survivor is told before any report is made.
- Reports to authorities are made in writing by the Secretary General (or the Chairperson), recorded in the case file, and do not exempt TIPCS from completing its internal process.

11. Donor and partner notification

Where a concern relates to a project, activity or person funded in whole or in part by a donor, the Secretary General shall notify the donor in accordance with the grant agreement. Unless the agreement sets a different time limit, TIPCS shall notify the donor in writing within 72 hours of the initial assessment establishing that the report is credible and falls under this policy, and in any case without delay for high-risk cases. Notifications contain only the information necessary: the nature of the allegation, the project concerned, the measures taken and the next steps. They do not include the name or identifying details of the survivor, and do not name the subject of concern unless the donor's rules require it and the law permits it.

TIPCS shall keep the donor informed of significant developments and of the outcome, and shall cooperate with any donor review in a manner consistent with confidentiality and Organic Law 2004-63. Where a partner of TIPCS is concerned, TIPCS shall require the partner's cooperation and may suspend funding pending the outcome. Where a concern involves personnel of another organisation, TIPCS shall, with due regard to the survivor's wishes and safety, inform that organisation's safeguarding focal point.

12. Confidentiality, record-keeping and data protection

Safeguarding information is among the most sensitive data TIPCS holds. It is processed in accordance with Organic Law No. 2004-63 of 27 July 2004, including its rules on data relating to offences and criminal records (art. 13), health data (art. 14) and children's data (art. 28), and with any obligations towards the National Authority for the Protection of Personal Data (INPDP).

- A confidential safeguarding register is kept by the Secretary General, listing for each case: number, date received, category, risk level, steps and dates, outcome and closure. It contains no names; names are kept only in the case file.
- Case files are kept separately from personnel files, in a locked cabinet or an encrypted, access-controlled folder, accessible only to the safeguarding focal point and persons expressly authorised for the case.
- Safeguarding information is never sent through personal email or messaging accounts; emails use the subject line "CONFIDENTIAL – Safeguarding" and minimal identifying content.
- Case files are retained for the period needed for legal, contractual and safeguarding purposes. Unless a longer period is required by law or a donor agreement, files concerning substantiated allegations are retained for ten years after closure and files concerning children until at least the child's twenty-fifth birthday; unsubstantiated cases are anonymised after five years. Records are then securely destroyed.
- Information is shared outside the case team only where necessary to protect a person, to comply with the law, to obtain specialised support with consent, or to meet donor obligations under section 11.

A breach of confidentiality in a safeguarding case is itself serious misconduct.

13. Protection against retaliation and malicious reports

No person who reports a concern in good faith, who is a survivor, or who assists in a case as a witness or otherwise, may suffer any dismissal, non-renewal, demotion, exclusion from activities, harassment, threat or other detriment for that reason. Retaliation is serious misconduct and is handled under this policy and the Whistleblowing and complaints policy. A report made in good faith that turns out to be unfounded has no consequence for the person who made it. A report knowingly false and made with the intention of harming another person may lead to disciplinary measures; the fear of such measures must never deter a genuine report.

14. Training and awareness

Who	Content	When
All TIPCS personnel	This policy, code of conduct, how to recognise and report concerns, responding to disclosures.	At induction, before starting work; refresher every year
Researchers, trainers and activity focal points	Risk assessment, research ethics, trauma-informed interviewing, referral pathways, online safety.	Before the first activity concerned; briefing before each fieldwork mission
Secretary General, deputy focal points, Board	Case management, survivor-centred response, investigation oversight, governance and donor obligations.	Within six months of appointment; update every two years
Participants and communities	Their rights, expected behaviour of TIPCS personnel, and how to raise a concern, in accessible language.	At the start of each activity

Attendance is recorded. Personnel who have not completed mandatory training may not lead activities with children or adults at risk.

15. Breaches and sanctions

Substantiated breaches of this policy lead to measures proportionate to their seriousness, taking into account aggravating factors (involvement of a child, abuse of authority, repetition, retaliation) and mitigating factors. Measures are applied in accordance with the Labour Code, the employment or service contract, the statutes of TIPCS and the principles of due process.

Person concerned	Possible measures
Employees	Warning, reprimand, removal from certain duties, suspension, dismissal for serious misconduct.
Consultants, interns, volunteers	Written warning, suspension, termination of the contract or agreement, exclusion from future engagement.
Board members, officers, association members	Measures provided by the statutes, including suspension and exclusion, decided by the competent body.
Partners and suppliers	Corrective action plan, suspension of funding or payments, termination of the agreement, exclusion from future partnerships.

Disciplinary measures are without prejudice to criminal or civil proceedings. Sexual exploitation, sexual abuse, any sexual conduct towards a child and retaliation are, as a rule, grounds for dismissal or termination.

16. Monitoring, reporting and review

- The Secretary General presents an annual safeguarding report to the Board, without identifying survivors, covering: number and categories of reports, time taken at each step, outcomes, referrals, donor notifications, training completed, risk assessments carried out and lessons learned.
- Aggregated, anonymised safeguarding data may be included in TIPCS's annual activity report and in reports to donors.

- The policy is reviewed every year, after any serious incident, and whenever the law or donor requirements change. Feedback from participants, personnel and partners is sought for each review.

17. Relationship to other TIPCS policies

This policy is to be read together with the other TIPCS policies, in particular:

- Code of conduct: general standards of behaviour, of which the safeguarding rules in section 7 form part;
- Whistleblowing and complaints policy: confidential reporting channel and protection of reporters;
- Research ethics and editorial independence policy: consent, anonymity and protection of research participants;
- Conflict of interest policy: withdrawal of conflicted persons from case handling;
- Sanctions, counter-terrorism financing and due diligence policy: partner vetting, with which the safeguarding checks in section 8.2 are combined;
- Anti-fraud, anti-corruption and gifts policy: prohibition of any advantage offered or demanded in exchange for favours.

In case of conflict, the provision that offers the greater protection to children and adults at risk prevails.

18. Glossary of abbreviations

Abbreviation	Meaning
SEAH	Sexual exploitation, abuse and harassment
PSEA	Protection from sexual exploitation and abuse
IASC	Inter-Agency Standing Committee
CHS	Core Humanitarian Standard on Quality and Accountability
INPDP	National Authority for the Protection of Personal Data
JORT	Official Journal of the Republic of Tunisia
SAMU	Emergency medical service (190)
UNCRC	UN Convention on the Rights of the Child

19. Approval and version history

This policy is issued by the Secretary General under the authority of the Board and enters into force on the date of its issue. It applies to all reports received on or after that date, including reports concerning earlier events.

Version	Date	Description	Issued by
1.0	25 October 2026	First full version, expanding the published summary into a complete policy with annexes.	Secretary General

Approval and document control

Document number	TIPCS-POL-02
Version	1.0
Date of issue	25 October 2026
Policy owner	Secretary General
Next review	October 2027 (and after any serious incident or change of law)
Applies to	Board members, staff, experts, researchers, interns, volunteers, consultants, partners and suppliers acting for TIPCS
Status	In force; ratified by the Board of Directors and legally reviewed

Version	Date	Change
1.0	25 October 2026	First issue

Issued by the Secretary General
Name, signature and date

Ratified by the Board of Directors — Chairperson
Name, signature and date

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This document is public. It is a governance commitment and does not replace legal advice.

Annex A — Safeguarding concern / incident report form

CONFIDENTIAL. Complete as soon as possible and in any case within 24 hours, and hand or send it only to the safeguarding focal point (Secretary General) or, if the concern involves the Secretary General, to the Chairperson. Do not investigate. Record facts and the person's own words; do not give opinions. Leave blank any field you cannot answer.

Part 1 – Person reporting (optional: you may report anonymously)

Name

Role / relationship to TIPCS

Safe way to contact you (phone, email, best time)

Part 2 – The concern

Date and time of the incident or of becoming aware of it

Place / activity / project concerned

How did you learn of it? (witnessed / disclosed to me / told by a third party / other)

Type of concern (sexual exploitation / sexual abuse / sexual harassment / child abuse / abuse of an adult at risk / trafficking / online harm / image or consent breach / other)

Description of what happened, in factual terms and, where relevant, in the exact words used

Part 3 – Persons involved

Person(s) affected: name or description, approximate age, sex, any disability or particular vulnerability

Is a child (under 18) involved?

Subject(s) of concern: name or description, role, relationship to TIPCS

Witnesses or other persons informed

Part 4 – Immediate safety and actions taken

Is anyone in immediate danger now? If yes, were emergency services called (197 / 193 / 198 / 190)?

Actions already taken and by whom

Wishes expressed by the person affected (if known)

Signature of person reporting (optional) and date

Part 5 – For the safeguarding focal point only

Case number and date/time received

Acknowledgement sent on

Initial risk level (high / medium / low) and rationale

Signature of the safeguarding focal point

Annex B — Risk assessment template for activities with children or at-risk groups

To be completed by the head of the department concerned before the activity and submitted to the Secretary General for approval (section 8.3). Rate likelihood and impact from 1 (low) to 3 (high); the risk score is likelihood × impact (1–2 low, 3–4 medium, 6–9 high).

Part 1 – Activity details

Activity / project title and donor

Dates and location(s); in person or online

Participants: number, ages, at-risk groups involved

TIPCS personnel, partners and suppliers involved

Activity focal point (name and contact)

Part 2 – Risk analysis

Risk area	Example risks	Likelihood (1–3)	Impact (1–3)	Mitigation measures	Residual score
Personnel	Unvetted person in contact with children; untrained staff				
Venue and accommodation	Isolated rooms; shared accommodation; unsafe access; lack of accessibility				
Transport and travel	Child transported alone; night travel; insecure routes				
Research content	Re-traumatisation; disclosures of abuse; exposure to reprisals				
Online	Intrusion into sessions; private contact with minors; leaked recordings				
Images and data	Identification of survivors; images taken without consent; data breach				
Partners and suppliers	Partner without safeguarding policy; drivers or interpreters not briefed				

Risk area	Example risks	Likelihood (1–3)	Impact (1–3)	Mitigation measures	Residual score
Context	Insecurity; social tensions; stigma attached to participation				

Part 3 – Safeguards in place

Safeguard	Yes / No / N/A	Comment
All personnel have signed Annex D and completed training		
Criminal-record extracts seen for roles in regular contact with children		
Parental / guardian consent and child assent forms ready		
Image consent forms (Annex C) ready		
Referral directory for the location checked and up to date		
Participants informed of how to raise a concern		
Two-adult rule and supervision ratios planned		

Part 4 – Approval

Overall residual risk (low / medium / high)

Prepared by (name, department, signature, date)

Decision of the Secretary General: approved / approved with conditions / refused; conditions

Signature of the Secretary General and date; review date

Annex C — Photo, video and story consent form

Explain this form orally in a language the person understands before signing. Consent is voluntary: refusing has no effect on participation in any TIPCS activity or on any support. Consent may be withdrawn at any time by contacting Contact@tipcs.org; TIPCS will then stop any new use, but cannot recall materials already printed or published.

Part 1 – Adult (18 years or over)

Full name

Activity, date and place

I agree that TIPCS may:	Yes / No
take photographs or video of me	
record my voice / interview	
use my story or quotations	
show my face	
use my name (otherwise a pseudonym or no name will be used)	
use these materials in reports and publications	
use them on the website and social media	
share them with donors and partners for reporting	

Period of use (default: 5 years from signature)

I confirm that the purpose and uses were explained to me and that I understood them. Signature (or mark) and date

Explained by (TIPCS staff name and signature); interpreter, if any

Part 2 – Child (under 18): parent or legal guardian consent and child assent

For children, TIPCS will never publish the full name, school, address or exact location, and will not use images of a child who is a survivor of violence in any identifiable way, even with consent.

Child's first name and age

Parent / legal guardian: full name and relationship to the child

Uses agreed (tick the same list as in Part 1: photo / video / voice / story / face / first name only / publications / website and social media / donors)

Signature of parent / legal guardian and date

Child's assent: "I understand and I agree." Child's signature, name or drawn mark

Explained by (TIPCS staff name and signature) and date

Annex D — Safeguarding commitment declaration

To be signed by every member of the Board, officer, employee, intern, volunteer, expert and consultant before starting work, and renewed on any change of role. A copy is kept in the personnel file.

I, the undersigned, declare that:

1. I have received, read and understood the TIPCS Safeguarding and PSEA policy (TIPCS-POL-02) and have had the opportunity to ask questions.
2. I will comply with the code of conduct in section 7 at all times, during and outside working hours, when my conduct is connected with TIPCS.
3. I will report immediately, and within 24 hours at the latest, any concern or suspicion of abuse, exploitation or harassment, whoever is involved.
4. To the best of my knowledge, I have never been convicted of, or dismissed or subject to disciplinary action for, any offence or misconduct involving a child, sexual exploitation, abuse or harassment, or violence, and I am not the subject of any pending proceedings of that kind. If this changes, I will inform the Secretary General without delay.
5. I understand that a breach of this policy may lead to disciplinary measures up to dismissal or termination of my engagement, and to referral to the competent authorities.
6. I consent to TIPCS processing the information in this declaration for safeguarding purposes, in accordance with Organic Law 2004-63.

Full name

Role / function and department

Place and date

Signature

Received by (Secretary General or delegate), signature and date

Annex E — Case-handling checklist

For use by the safeguarding focal point (or the Chairperson where the Secretary General is involved). Keep the completed checklist in the restricted case file.

Case number

Case handler and confirmation of no conflict of interest

No.	Action	Time limit	Done (date / initials)
1	Immediate safety ensured; emergency services called if needed; medical care offered	Same day	
2	Report recorded in the safeguarding register; case number assigned; restricted file opened	1 working day	
3	Conflict-of-interest check; case reassigned if needed	1 working day	
4	Acknowledgement sent to the person reporting	3 working days	
5	Survivor informed of options, services and any mandatory reporting; wishes recorded; support offered	As soon as possible	
6	Initial assessment and risk level documented; route decided	7 days (24 h if high)	
7	Child involved: child-protection delegate alerted (art. 31 Child Protection Code); prosecutor if offence	Without delay	
8	Adult survivor: decision on report to authorities, with consent unless the law requires otherwise	Without delay	
9	Interim measures considered and recorded	With assessment	
10	Donor(s) notified in accordance with the agreement (default 72 hours after initial assessment)	Per agreement	
11	Investigator appointed with written terms of reference	Upon decision	
12	Subject of concern informed and heard; evidence secured	During investigation	
13	Investigation report received	Normally 60 days	
14	Decision on findings and measures by the competent decision-maker	10 working days after report	
15	Survivor, subject of concern and donor informed of outcome as appropriate	5 working days after decision	
16	Lessons learned recorded; risk assessments and procedures updated; file closed and retention date set	At closure	

Case closed on (date) and signature of the case handler

Observations
