



FSD Stakeholder, Beneficiary and Social Management Policy

The Swiss Foundation for Mine Action (FSD)



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FSD Stakeholder, Beneficiary and Social Management Policy

As a matter of principle, humanitarian and development projects have to ensure that their implementation does not cause any harm or bring about negative consequences for any of the stakeholders involved. This “do no harm” principle explicitly also applies for humanitarian mine action (HMA) programmes. As an HMA organisation, FSD is therefore keen to not only display professionalism and excellency in its mine action activities, but also actively seeks to protect the environment and the climate and to support social development among its beneficiaries and stakeholders.

In order to ensure that all of FSD’s programmes are implemented in a sustainable way, FSD has developed a Stakeholder, Beneficiary and Social Policy that defines management measures to avoid or mitigate potential negative impacts.

Guiding Principles

FSD is committed to provide its best efforts to avoid or mitigate adverse environmental, social and climate impacts in all of the projects it implements. FSD seeks to:

- Avoid, reduce or limit adverse cultural and social impacts and enhance community and social benefits from its programmes;
- Preserve and protect biodiversity and sustainably manage local resources;
- Avoid adverse impacts upon the living conditions and cultures of communities;
- Ensure and support health protection at work and the occupational health and safety of people working on FSD programmes;
- Condemn forced labour and child labour, ban discrimination¹ in respect of employment as well as occupation and support the freedom of association and the right to collective bargaining; and
- Protect and preserve national and local cultural heritage.

Key Documents

In order to ensure that FSD programmes are in full compliance with applicable national and international environment, social, health and safety regulations, this policy is specifically developed for project implementation and has been inspired by, and complies with, the regulations set forth in a number of key documents:

International Donor and Good Practice Guidelines:

- KfW Development Bank – Sustainability Guideline. Assessment of Environmental, Social, and Climate Performance: Principles and Process (Feb, 2021)
- World Bank Group (WBG) – Environmental and Social Safeguards
- International Finance Corporation (IFC) – Environmental and Social Performance Standards (PS)

¹ Based on ethnic origin, nationality, age, sex, religion, disability or any other discrimination criteria.

- PATRIP Foundation – Environmental and Social Policy (Final Report v5.1).
- ALNAP Engagement of Crisis Affected People in Humanitarian Action².
- Humanitarian Practice Network – Humanitarian Accountability³
- The European Consensus on Humanitarian Aid⁴.
- Impact Measurement and Accountability in Emergencies – The Good Enough Guide⁵.

International Mine Action Guidelines: International Mine Action Standards (IMAS), describing best practice in mine action:

- IMAS 07.13 Environmental Management in Mine Action (First Edition)
- IMAS 08.40 Marking mine and ERW hazards (Second Edition)

FSD Policies and SOPs: FSD institutional policies and Standard Operating Procedures (SOP), describing how FSD conducts all of its mine action activities and manages all staff:

- FSD Code of Ethics.
- FSD Code of Conduct.
- FSD PSEA Policy.
- FSD Gender, Diversity and Inclusion Policy.
- FSD Environmental Policy.
- FSD Grievance Policy.
- FSD Whistle-blower Policy.
- FSD Procurement Policy and Policy on Ethical Procurement.
- FSD Health and Safety Policy
- FSD Sanctions Policy

Due to its long experience in mine action and its adherence to all applicable international, national and internal standards on environmental protection as well as social aspects, FSD meets and exceeds many of the measures and practices outlined in the strategy and policies listed above. Further, FSD's internal guidelines are modelled on these good practice guidelines and papers, including the Sphere Standards⁶, International Mine Action Standards (IMAS) and national mine action standards in the countries where FSD works and are extremely comprehensive in controlling all aspects of health and safety and the approach to operations. In addition to this, all FSD clearance programmes include specific community liaison and engagement activities in areas close to demining worksites and other areas where FSD works.

All de-mining planning and execution activities are conducted under stringent operating standards that are regularly subject to both internal and external validation and all de-mining operators must be accredited and registered with national authorities before any organisation is allowed to

² <https://reliefweb.int/sites/reliefweb.int/files/resources/background-paper-29th-meeting.pdf>

³ <https://odihpn.org/wp-content/uploads/2007/04/networkpaper058.pdf>

⁴ https://ec.europa.eu/echo/who/humanitarian-aid-and-civil-protection/european-consensus_en

⁵ <https://policy-practice.oxfam.org/resources/impact-measurement-and-accountability-in-emergencies-the-good-enough-guide-115510/>

⁶ <https://spherestandards.org>

operate.

FSD's mine action and other activities generally fall in two categories. Firstly, clearing land mines and other explosive remnants of war; and secondly, soft skill interventions, particularly in the field of explosive ordnance risk education (EORE), survey and community liaison. This also includes mine victim assistance activities.

In light of these categories and the activities they cover, FSD has developed mitigating measures and procedure in order to protect stakeholders, beneficiaries and local communities. The key processes are outlined below and cover both the project preparation and implementation stages.

Programme Preparation (Design, Planning)

- **Stakeholder Engagement:** Prior to project implementation, FSD commits to engage and communicate with communities and to plan sufficient time for their participation. FSD further commits to ensure regular consultations with the local authorities and communities regarding its mine action activities. A simple template "Stakeholder Engagement Plan" is shown at **Annex A** to this policy to record, control and monitor these actions.
- **Grievance Mechanism:** FSD documents all grievances from workers, communities and other stakeholders formulated on a register along with the responses given. Anonymity, if required, will be guaranteed. This is considered an extension of FSD's existing whistle-blower policy, which provides all FSD staff with a neutral and independent mechanism for such redress within FSD. This policy, in information on how community members, stakeholders and all FSD's partners can contact FSD in country and through its HQ are briefed in all projects to local community members and leaders. A simple "Grievance Form Template" is available at **Annex B** to this policy to distribute to community members and to record any complaints or issues.
- **Occupational Health & Safety:**
 - To ensure the highest standards of professionalism and full compliance with all regulations and guidelines set forth and referred to in this document, FSD will continue its commitment to conduct all project implementation on its own, through workers employed, trained and supervised by FSD. In the exceptional circumstance that an external organisation of any kind needs to be contracted for implementation of activities, FSD will ensure to solely contract specialized firms that are internationally recognized and act according to international good practices in mine action. Specifically, they also must have registration and accreditation with the national authority.
 - FSD conducts annual refresher trainings for all staff members in its programmes on both technical and organisational levels. At this time, the relevant health and safety measures for clearing landmines and unexploded ordnance (UXO) are explained and rehearsed along with any programme specific activities and measures. At the same time refresher training is conducted on FSD's core policies, procedures and cross cutting topics such as gender equality, PSEA, environmental considerations, code of ethics and code of conduct.
- **Community Health and Safety:** FSD commits to continue its efforts to include beneficiary communities of FSD's clearance operations in its risk education outreach. This is intended to ensure that community members are prepared for emergencies, such as the discovery of further landmines or unexploded ordnance (UXO). In conducting community liaison and risk education sessions, all communities are educated in the signage used in minefields and are made aware to the threats, items to be aware of and the actions to be taken if a suspicious item is found or encountered.

Project Implementation

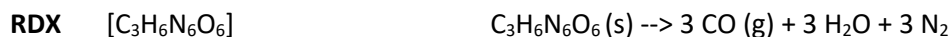
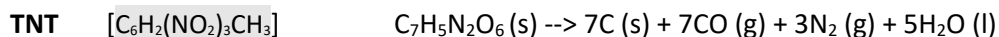
- **Grievance Mechanism:** FSD document all grievances from workers, communities and other stakeholders formulated on a register along with the responses given. Anonymity, if required, will be guaranteed.
- **Labour Conditions:** FSD has clear standards on labour conditions, which are set out in various documents such as FSD's Code of Ethics. FSD therefore ensures the following minimum labour conditions:
 - Children below 18 years will under no circumstances be employed by FSD.
 - FSD remunerates its employees under the principle "equal pay for equal work" under applicable remuneration standards and national employment laws in each country it works in.
 - Employment relationships between FSD and its staff are based on principles of equal opportunity, fair treatment, and non-discrimination (e.g. due to gender, age or origin).
 - FSD only accepts contributions from the community in the form of labour if it can be ensured that the contribution is given voluntarily and does not negatively affect livelihoods.
 - Under no circumstances will FSD make use of forced labour, including prison work.
 - FSD commits to ensure that the workforce has access to primary healthcare on site, providing prescriptions. The presence of qualified medics, ambulances and medical equipment, including first aid kits, during all demining activities is imperative, and FSD ensures to fully comply with any demining-related health standards as outlined in FSD's SOPs on Medical Support and Casualty Evacuation.
 - As part of any CASEVAC plan, FSD identifies emergency services (nearest hospital, health centre or doctor) and makes them available to workers in case of need. The medical evacuation assessment plan for each FSD demining work site forms an annex to the demining worksite task dossier, which is held on site at the control point as well as with the on-site medic and ambulance.
- **Occupational Health & Safety:** The need to reduce risk and to provide a safe working environment are fundamental principles of mine action management. FSD's specific measures are outlined in the following:
 - FSD ensures that the relevant health and safety measures for clearing landmines and unexploded ordnance (UXO) are regularly explained and rehearsed, including safe work practices, emergency procedures and the incident reporting requirements.
 - In compliance with international and national standards and best practice in HMA, FSD continuously records accidents, near misses and factors constituting unplanned dangerous situations, as outlined in all IMAS and national standards.
 - To ensure the safety of all employees and local community members, FSD continuously monitors all security warnings and has a proactive attitude vis a vis the security situation. Should the situation require it, FSD is not reluctant to evacuate personal to ensure their safety.
 - To ensure high workplace safety standards, FSD commits to equip its deminers with modern, functional demining equipment, to regularly check the equipment and to update/refurbish or replace outdated and worn-out equipment.
 - FSD ensures the provision and use of effective Personal Protective Equipment (PPE),

tailored to the explosive hazards that deminers are exposed to. In this context, FSD commits to always fully comply with the standards set in Personal Protective Equipment (PPE) standards. In addition to this, FSD also commits to provide all staff protective clothing and uniform for their daily tasks so that a set may be worn whilst a set is washed for hygienic reasons.

- **Soil and groundwater contamination:** As obliged by international and national mine action standards for *Environmental Management* and internal SOPs, FSD will monitor any excessive kick-out from detonations following mine disposal operations. This specifically applies to disposal of any phosphorous ammunition or similar.

Landmines and Environmental Contamination

Vehicles are only used to transport staff to and from the minefield administration areas. Secondly, the destruction and disposal of mines, either by burning or by detonation only ever creates water vapour, nitrogen and carbon dioxide or carbon monoxide gases. 99.9% of explosives are organic nitrate-based hydrocarbon compounds and therefore are not polluting. There are a number of academic text books on the topic of Explosive Chemistry (Oxley J.C., 1998, Akhavan J., 2011, Agrawal and Hodgson 2007); the majority of mines and explosive ordnance encountered worldwide is either an organic derivative of TNT (trinitrotoluene or more specifically 2,4,6-trinitrotoluene) or RDX/HDX (cyclotrimethylenetrinitramine - C₃H₆N₆O₆) and these compounds break down thermally to produce:



Therefore, it can be proven that the largest output from the thermal detonation of these organic compounds is carbon, carbon monoxide, water and nitrogen which are all non-toxic in the free atmosphere as gases. There are some exceptions to this with more modern explosive compounds developed in high end missiles and munitions, however these are not encountered in the majority of FSD's programmes.

Some authors have looked at the possible polluting effects of explosives on the environment of explosives (Burrows et al., 1989 and Ghalaieny, 2013), especially in relation to organic explosives and other explosive remnants of war. However, it can be drawn from the discussions surrounding the topic that most, if not all, of the concerns relate to pollution from the physical toxic effects of un-decomposed explosive residue and particles within military firing ranges and high use demolition grounds. Over many years the issue of pollution by excessive demolitions and the transportation of explosives in those areas can cause some raw particulate contamination of the ground and storage areas which commensurately can have an accumulative effect on the soil. As de-mining does not involve large scale demolitions or long-term storage of munitions, this concern is not applicable; small scale demolitions of mines and explosive remnants of war are conducted with recovered mines and ammunition under this project, but only in designated demolition areas from the national authority. Even then, the scale of demolitions is nowhere near the years of exposure and the levels of contamination that even approach the concerns of academics and research on the issue of environmental pollution from post thermal decomposition of organic explosives.

Community Health & Safety

- **Mine Field Marking and Site Access:** FSD ensures to fully implement the restrictions to access to de-mining sites as prescribed within SOPs as well as *IMAS 08.40 Marking mine and ERW hazards*. However, it should be noted that physical fencing requires special consideration due to prohibitive costs for miles of fencing required as a result of the large nature of hazardous areas, the subsequent theft hazard (for scrap salvage of fencing materials) and drawing community members towards the minefields to do this. As a physical safety measure, all access to any demining worksite is controlled through the control point which is clearly signed for all visitors.
 - Should the need arise to employ and place security personnel at any FSD work site, FSD ensures that they are properly trained in the use of force and appropriate conduct toward workers and affected communities.
 - To avoid security risks, FSD ensures that extracted landmines are not available for reuse. Landmines will be destroyed/disposed of as soon as reasonably possible.
 - In addition to the above measures, if demolitions are conducted in the vicinity of houses and the presence of the public, sentries are posted, advance warnings and communications are transmitted to communities and cordons are set as appropriate/needed in accordance with IMAS.
- **Soil Management:** Any disposal of mines or explosive remnants of war will be conducted within defined demolition areas by FSD demining teams. These areas are selected due to their suitability with regards to no vegetation (due to fire risk), no stones (due to enhanced fragmentation/kick out) and free land which does not affect the community or the local population. After demolitions have been carried out, the site is returned to the community and the national authorities along with the handover of the land. There is no land lost due to this process. Demolitions may create some small pits within the site chosen, but these are easily levelled and returned to normal and are accepted by the process of the handover to the national authority.

Review and Investigation of Grievance and Complaints Procedure

If any complaints and/or grievances, at any time in the process, seem or appear to include or relate to sexual abuse, then the respective FSD focal points and/or HQ staff will immediately defer to the FSD PSEA Policy and follow the guidelines and advice in that policy.

To enable stakeholders, beneficiaries and any other public complainants to report cases of misconduct, irregularities, rule/law infringements and general complaints related to FSD's work and operations, FSD commits to:

- Provide a general and direct reporting system at headquarters level through a dedicated confidential email address. The grievance form at **Annex B** gives a generic report format for any FSD staff to record and report grievances for consideration and/or reporting upwards to the FSD Board or externally to independent investigators.
- Nominate focal persons in each country programme to whom staff and community members can report grievances and complaints to, and receive clarity on the reporting process. Where possible, at least two people in each country/programme will be assigned this task, including at least one man and one woman. Ideally, these staff will/should have positions that allow for regular interaction with beneficiary communities. They will be duly instructed on how to handle reports of complaints and be able to speak the local languages of the areas of

operations. The roles and responsibilities of these focal persons are to be clearly defined in their contracts and/or ToR and include:

- Treating all complaints with the utmost confidentiality;
 - Reporting all complaints completely and truthfully to the FSD HQ/Board as the designated body tasked with identifying if the complaint warrants or not an investigation;
 - Induction training and annual refresher trainings on the grievance policy to all staff;
 - Facilitation of awareness-raising in beneficiary communities;
 - Support to the development and/or implementation of reporting mechanisms.
- Adapt outlets to file complaints to best fit the needs of beneficiaries where each programme runs and to present them in a way that all groups, including children, understand. These should be designed by the respective FSD focal persons in consultation with the FSD HQ grievance and complaints representative as necessary.
 - Provide country-specific reporting channels both for staff and beneficiaries/public. These should consider access to resources and services, as well as cultural sensitivities. Such reporting channels should also allow for people with different educational backgrounds, disabilities and language skills to file a complaint. They must be accessible, transparent, safe and confidential. In country programmes this channel and approach mechanism will be briefed to all village elders/community leaders where FSD conducts work and/or operations.
 - Give complainants the free choice which of the provided reporting mechanism they want to avail of. Skipping the chain of command for reporting complaints is decidedly not a form of misconduct.
 - Protect the identity of complainants to the highest possible extent. Complainants are free to choose whether or not they want to disclose their identity. However, should a complainant decide to file an anonymous allegation, he or she must provide sufficient information so that a potential investigation has an adequate basis. All complaints and grievances should be precise and detailed and, as a minimum, include the name and function of the alleged offender and the description of circumstances, events and timing.

A person reporting a concern, grievance or complaint in good faith and with no ulterior motive will never be retaliated against, regardless of whether the complaint is found to be true or not. All complaints reported by staff, beneficiaries and the general public will be treated with the utmost confidentiality to protect complainants, witnesses and subjects of complaint and hinder the spurring of rumours that could endanger the safety or reputation of staff. If deemed necessary, other actions can be taken to further protect complainants, witnesses and subjects of complaint from within the organisation from retaliation. These actions, to be taken with the free and informed consent of the complainants, may include

- their temporary reassignment;
- transfer to another office or function for which the complainants are qualified;
- placement on special leave with full pay;
- any other protective measure to be determined according to FSD's, and the respective FSD programmes' ability to ensure the safety and well-being of reporting staff.

FSD will impose disciplinary measures for staff members retaliating against complainants, witnesses and subjects of complaints. Disciplinary measures are to be adapted respective to each country programme's context in accordance with national laws and labour laws. Local and international staff may be subject to different laws, and this will be considered when developing disciplinary measures. Such measures towards staff members who retaliated against complainants may

include:

- loss of/withholding of up to three months' net base salary;
- written warning to be retained in the staff's personal record for up to five years;
- reduction of salary grade;
- suspension with partial or no pay for up to one month;
- termination of contract.

Investigations

All allegations and complaints will be initially reviewed at the HQ Director level. The respective process for the investigation of individual cases will be defined by the FSD Director based on the available information. **Annex C** provides an Aide Memoire for guidance on how an investigation might proceed. The process can take a number of different forms, such as:

- Case merits external investigation and is handled by a Board representative.
- A joint committee is formed in Geneva HQ by the Board representative to investigate, including FSD Director and possibly operations department representative if appropriate.
- The case is referred to a joint committee involving the Programme Manager, Geneva HQ and Board representative in order to collect more information and investigate as required.

Once a complaint is made, the complainant, the subject of complaint is formally informed about the steps of the investigation. The subject/department/focus area of the complaint should be made aware of the specific allegations at stake, but under no circumstance should the identity of the complainants be disclosed. The whole process is to be undertaken with the utmost discretion.

If the allegation appears to be serious and substantiated, the FSD HQ and/or Board will open a full investigation of the case, based on all available information, and by involving managers and staff at all hierarchical levels if necessary. Every case will vary and an individual investigation approach and method will be defined at this point. All staff members contacted during the investigation process will be informed that any breach of confidentiality will lead to disciplinary measures. If external witnesses are contacted during the investigation process, the importance of confidentiality is also explained to them.

The investigating team will conclude their inquiry by drafting a comprehensive report about the case and deliver it to the FSD HQ or Board lead; this will then lead to any corrective action, sanctions and/or disciplinary actions as necessary – or close the file in case the findings have been unsubstantial.

Assistance

When a complaint is made, the FSD focal person(s) or other designated professional will carry out an assessment of the needs of any victim and/or complainant, if these are two different individuals. The needs assessment should define their health and security needs, the resources they need, all measures taken to ensure their safety and the timeline for following up with them.

FSD commits to:

- Provide safety and security to programme staff, interns, volunteers, beneficiaries and other relevant stakeholders who might be victims of the complaint substance or allegations regardless

of age, gender, ethnicity, sexual orientation, disability to ensure they are not at increased risk of exploitation or abuse or pose a risk to others.

- In the instance that a complaint has any sexual abuse allegation – FSD’s PSEA Policy procedures will be enacted and FSD will provide (where necessary) referral for medical and psychosocial assistance to survivors of SEA to include psychosocial counselling, peer support, victim advocacy, medical treatment (such as pregnancy prevention, medication for sexually transmitted infections (STIs), PEP kits), and legal assistance.
- Conduct timely and transparent administrative investigations by developing guidelines and considerations for the conduct of any investigations, including principles for referring to local authorities and using a list of trusted and vetted investigators when/if they are needed. For this purpose, focal persons are required to create and maintain an updated list of local service providers and/or contacts with local coordination mechanisms for their respective country programmes.
- Work with local authorities to ensure criminal accountability and prosecution of any perpetrators by providing evidence, testimonies, and/or being available when/as/if required.

Promote organisational learning by ensuring that FSD learns from our efforts both successes and failures and those of others in the sector and by ensuring feedback is reflected on and acted upon.

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- Ghalaieny M. (2013), *Toxic Harm: Humanitarian and Environmental Concern from Military-Origin Contamination*, The Toxic Remnants of War Project, accessed online at: http://www.toxicremnantsofwar.info/wp-content/uploads/2013/03/Toxic_Harm_TRWProject.pdf, 29 Nov 2018.
- Oxley J.C. (1998) *The Chemistry of Explosives*. In: Zukas J.A., Walters W.P. (eds) *Explosive Effects and Applications. High-Pressure Shock Compression of Condensed Matter*, Springer, New York, NY.

Stakeholder Engagement Plan and Record

[Enter Description of Programme and Activities]

FSD follows a do no harm framework, reviewed throughout the project to maintain a neutral, independent, humanitarian and impartial approach at all times. Through Non-Technical Survey and Community Liaison, FSD will interact with local communities to assess the impact of the intervention:

- Decisions on “who” are the beneficiaries of survey, EOD and clearance operations in order to maintain neutrality between communities and national priorities.
- Decisions on “who” is employed by FSD as local employees and to ensure a wide spectrum of the community are approached.
- Decisions on “what” and “how” operations are delivered and executed.
- Decisions on “who” FSD collaborates with and how.

FSD further ensures the local approval of any project implementation not just by seeking informal consent, but by requiring respective communities and local officials to actively issue letters of request before any action is taken. The request letters for the area in which FSD currently carries out PATRIP funded mine clearance are attached to this document.

Engagement Activities

During preparation of this project, the following activities were organised to disclose information and engage with stakeholders:

Stakeholder	Date	Method

Key Findings

The following concerns and suggestions were identified within stakeholder engagement and will be considered by FSD:

Concern/Suggestion	Stakeholder	Responses by the Project

Grievance Form	
Reference No:	
Full Name:	_____ <input type="checkbox"/> I want to remain anonymous
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By phone: _____ By _____ Telephone (Please provide Telephone number): _____ <input type="checkbox"/> By E-mail: _____ <input type="checkbox"/> Other: _____ <input type="checkbox"/> I don't want to be contacted
Preferred Language for communication	<input type="checkbox"/> ... IP to include languages spoken in the region... <input type="checkbox"/> ...IP to include languages spoken in the region... <input type="checkbox"/> Other, please specify: _____
Description of Incident or Grievance:	
<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
Date of Incident/Grievance:	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Investigation Aide Memoire

This document is designed to be used by the FSD HQ and/or Board and/or any 'Joint Committee' and should be read in conjunction with the FSD Stakeholder, Beneficiary and Social Engagement Policy and any applicable donor or UN Cluster approach or country specific toolkits for more detail.

The following are some key points for the FSD Board/ Joint Committee to consider when managing (or overseeing) investigations:

- **Review Process and Immediate Action:**
 - Review the allegation/grievance/complaint.
 - Determine if an internal investigation is warranted.
 - Determine if referral to local law enforcement authorities is required.
 - Determine the immediate actions required regarding the alleged perpetrator in terms of their work (e.g. suspension, change of job responsibilities).
 - Determine what immediate assistance is required for the complainant(s), including referral to appropriate service providers.
 - Some criteria to consider regarding the investigation process includes the nature of the grievance/complaint (i.e. breach of the organisation's code of conduct/national criminal law), reliability of source(s) of allegation, availability of hard evidence (e.g. photographs), and risk(s) for the complainants associated with the investigation process.
 - Keep a record of all decisions made.
- **Appoint an investigator(s):**
 - Appoint an appropriately trained and qualified FSD staff member/focal point.
 - Consider activating specialist investigation services if needed.
 - Consider the language requirements.
 - Develop the scope of the investigation and issue a Term of Reference.
 - Agree with the investigator(s) from the outset on the scope of the investigation, coordination and communication processes (e.g. regular check-ins with managers), deliverables and timelines, contingency plans, and other key aspects of the investigation.
 - Identify and manage any potential conflicts of interest.
- **Manage communications** in order to protect those directly involved as well as the integrity of the process. This involves:
 - Distinguishing between communications on the process of an investigation (e.g. state of investigation process), which should be transparent, and details relating to the case (e.g. identity of parties involved, details of incident), which should be treated confidentially.
 - Defining which individuals need to have access to what type of information.

- Keep information and documentation pertaining to the investigation, both written and digital, secure.
- Ensure all FSD staff cooperate with the investigation. Provide access to all relevant internal documents, records and personnel, as well as adequate and administrative support to conduct investigations effectively.
- Requesting all parties directly involved in the investigation process (e.g. investigators, survivors, witnesses, alleged perpetrators, designated managers/personnel) to keep the content of their interviews confidential.
- Develop a system for keeping witnesses, alleged perpetrators and complainants informed on relevant aspects of the investigation process
- **Provide adequate protection and other support to witnesses and complainants/whistle-blowers, and alleged perpetrators** (as part of our duty of care for personnel) throughout the investigation process as needed. For example, individuals directly involved in the case may require independent legal counsel and/or an advisor/support person to provide emotional support, share updates on the investigation, and to serve as a liaison with the investigation team as needed. Children and witnesses are likely to require additional support to ensure that the investigation process is conducted in a child-friendly manner (e.g. child-friendly interview techniques, engagement of parents/caretaker).
- **Assess and manage risks relating to the investigation process** by conducting a comprehensive risk assessment.
- **Follow up on investigation outcomes**, including through the following actions:
 - Make the outcomes of the investigation available to the complainant and the accused party and follow up with them to find out if they require additional psychosocial or other support.
 - In case a complaint is substantiated, take appropriate disciplinary actions or mitigating steps against the perpetrator that corresponds to the severity of the offense committed, ranging from a written reprimand to dismissal.
 - If necessary, report the case to relevant local law enforcement authorities, including the police and/or judicial authorities.
 - Use the investigation report to identify any institutional weaknesses in preventing and responding to grievances that may require changes in our policies, procedures and staffing.