

ICIMOD Safeguarding Policy 2026

including

Policy A: Protection from Sexual Exploitation and Abuse (PSEA) Policy

Policy B: Child Safeguarding Policy

Policy C: Bullying and Sexual Harassment in the Workplace Policy

Policy D: Social Safeguards Policy

Policy E: Research Ethics Policy

Policy F: Whistleblowing and Incident Management Policy



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Abbreviations and acronyms

DG	Director General
GESI	Gender Equality and Social Inclusion
HKH	Hindu Kush Himalaya
HROD	Human Resources and Organisation Development
ICIMOD	International Centre for Integrated Mountain Development
LOA	Letter of Agreement
MOU	Memorandum of Understanding
PSEA	Protection from Sexual Exploitation and Abuse
REC	Research Ethics Committee
RMC	Regional Member Country
SEA	Sexual Exploitation and Abuse
SEAH	Sexual Exploitation, Abuse, or Harassment
SMC	Senior Management Committee
SOP	Standard Operating Procedure

1. Introduction

The International Centre for Integrated Mountain Development (ICIMOD) is committed to fostering a safe, respectful, and inclusive environment where all individuals – ICIMOD staff, other personnel¹, service providers², partners (see more details on partners below), and community members (including children) who are associated with ICIMOD’s work are **protected from sexual and any other forms of exploitation, abuse, harassment, and bullying**.

ICIMOD is committed to promoting broader societal wellbeing and ensuring that its work does not negatively impact society. The **Social Safeguards** provisions in this policy outline ICIMOD’s approach to identifying, preventing, and mitigating potential social risks while fostering equitable and inclusive development in the Hindu Kush Himalaya (HKH) region.

This policy also outlines ICIMOD’s commitment to upholding the **highest ethical standards in all research involving human subjects**.

ICIMOD places the highest importance on **whistleblowing** as a critical accountability mechanism and encourages reporting of any suspected safeguarding violations, including through **anonymous channels**, which would be accessible to all. All concerns raised in good faith – whether by staff, partners, or affected individuals – will be treated seriously, handled sensitively, and investigated promptly and appropriately with due protection against retaliation. ICIMOD emphasises the obligation to report and investigate allegations while also prohibiting knowingly making false allegations.

This policy is grounded in a **victim-centric approach**, ensuring that the rights, dignity, and well-being of victims/complainants are prioritised at every stage of response and redressal. ICIMOD recognises that safeguarding is not only about compliance, but also about creating a culture of care and accountability where victims, complainants, and witnesses are heard and supported without fear of retaliation or stigma.

ICIMOD partners that are directly involved in implementing the Centre’s planned activities and/or utilising ICIMOD funding must comply with this safeguarding policy in case they do not have a

compatible policy of their own. In the subsequent sections of this policy, the term ‘partner’ refers to this category of partners.

Before entering into a partnership agreement, ICIMOD will conduct due diligence of such partners guided by the internal Standard Operating Procedure (SOP) on ICIMOD Partnerships. Additionally, ICIMOD will conduct periodic due diligence audits to ensure ongoing compliance with this policy.

ICIMOD also collaborates with regional and international strategic partners, including government agencies of ICIMOD’s Regional Member Countries (RMCs). ICIMOD will work collaboratively with these partners to conduct safeguarding risk assessments and develop risk mitigation plans to align with the provisions mentioned in the specific partnership agreement. This is complementary to the partners’ own safeguarding policies.

1.1 Safeguarding standards and commitments

This policy aims to be consistent with international safeguarding standards and is in line with ICIMOD’s [Gender Equality and Social Inclusion \(GESI\) Policy 2024](#), [People & Organisational Development Strategy 2024–2026](#), and Human Resources Policy.

Victim-centric: A victim-centric approach prioritises the safety, dignity, and agency of individuals who experience harm due to ICIMOD’s work or acts perpetrated by ICIMOD staff, other personnel, service providers, and partners. It ensures they are supported through confidential, trauma-informed, and non-retaliatory processes based on informed consent. This includes timely access to medical, psychosocial, and legal support, while actively preventing re-traumatisation and stigma. Individuals who attempt to obstruct, intimidate, or retaliate against victims/complainants will face disciplinary action.

In addition, any false complaint will be treated as misconduct, and the complainant will be liable for disciplinary action.

¹ Consultants, special services agreements, interns, volunteers, young professionals, PhD researchers, Post Doc Fellows, Senior Fellows, Visiting Scientists

² Including all kinds of vendors and contractors

Zero tolerance: ICIMOD adopts a zero-tolerance approach towards any form of abuse, harassment, or exploitation. All proven safeguarding violations will result in appropriate disciplinary action – regardless of severity or intent, and may result in serious consequences, including termination of employment and legal consequences where applicable.

Anti-sexual harassment: ICIMOD is committed to safeguarding against all forms of sexual harassment, which refers to any unwanted, unwelcome, or inappropriate sexual behaviour that violates dignity, abuses power dynamics, or creates a hostile work environment. It includes, but is not limited to:

- Verbal conduct – sexual remarks/jokes/comments, or sexually suggestive language
- Non-verbal conduct – leering, sexual gestures, or sharing inappropriate materials
- Physical conduct – unwanted touching, assault, or coercion
- Online harassment – sending inappropriate messages, online stalking, or sharing explicit content

Inclusion and non-discrimination: ICIMOD upholds an inclusive safeguarding approach, ensuring gender sensitivity, cultural appropriateness, and accessibility for women and other disadvantaged groups. ICIMOD applies the safeguarding standards fairly to all individuals, ensuring protection without discrimination, based on individual characteristics or personal circumstances. ICIMOD acknowledges that certain individuals and groups, particularly women and girls, may face a higher risk of being exposed to or experiencing safeguarding violations. In the region where ICIMOD works, such violations may emerge due to deeply ingrained societal norms, stereotypes, and implicit biases. While gender bias may not always fall directly under the scope of safeguarding, this policy acknowledges that these issues arise from discriminatory norms, societal expectations, and unconscious biases, which may contribute to the exploitation and harm of different genders. To address these risks, ICIMOD will ensure that gender bias is carefully considered and mitigated across all safeguarding processes.

Workplace culture and systems: ICIMOD enforces strict hiring, vetting, and safeguarding orientation/training processes to ensure all staff, other personnel, service providers, and partners uphold the highest standards of ethics with regard to their personal and professional conduct. No staff, other personnel, service providers, or partners with a history or record of sexual exploitation, abuse, or harassment (SEAH) will be hired under any circumstances.

Programming and project management: ICIMOD requires a mandatory Safeguarding Risk Assessment for all its activities and Interventions, including those implemented by partners. This Assessment ensures that necessary safeguarding measures have been discussed by the teams, are in place, a clear risk management plan is developed, and a safeguarding focal point is assigned to oversee mitigation actions.

Confidentiality and data protection: All safeguarding concerns, complaints, and reports will be handled with the strictest confidentiality to protect complainants and all individuals involved in the process.

Accountability and transparency: ICIMOD holds itself accountable to its safeguarding commitments, ensuring regular policy reviews, audits, and compliance monitoring. Leadership at all levels is responsible for fostering a culture of openness, ethical behaviour, and non-discrimination. Safeguarding incidents will be reported to the concerned donors in accordance with the commitments outlined in individual donor agreements and compliance with donors' safeguarding policies. The Director General (DG) may consult with the Programme Advisory Committee (PAC) Chair and other members of the Board of Governors, as appropriate, when addressing serious safeguarding incidents.

1.2 Scope and legal framework

This policy applies to ICIMOD's staff, other personnel, service providers, partners, and community members engaged in ICIMOD's work. This policy extends to all ICIMOD programmes and operations, including but not limited to the following:

- ICIMOD offices
- Fieldwork sites
- Partner workspaces
- Engagement with local communities
- Conference venues, research facilities, and training centres
- Online and virtual platforms, including emails, messaging apps, and social media

ICIMOD ensures compliance with national and local safeguarding laws in the countries where it operates, where such laws exist. In the event of a conflict between local laws and ICIMOD's safeguarding policy, the organisation will apply a higher standard of protection to uphold international safeguarding principles and act in accordance with the advice from external legal experts.

1.3 Roles and responsibilities

ICIMOD recognises that safeguarding is a shared responsibility that requires commitment from the Senior Management Committee (SMC), staff, other personnel, service providers, and partners. Everyone at ICIMOD, regardless of their position, has safeguarding responsibilities; this section defines the specific roles and responsibilities of individuals and groups within ICIMOD who ensure the successful implementation of safeguarding policies.

All staff, other personnel, service providers, and partners must uphold safeguarding principles and read, understand, and comply with ICIMOD's safeguarding policy.

Failure to comply with safeguarding obligations will result in disciplinary action, including possible dismissal of staff and other personnel, or termination of the contract in case of service providers and partners.

The **Head of Human Resources and Organisation Development (HROD)**, with support from the Safeguarding Specialist, is responsible for embedding safeguarding in ICIMOD's workplace culture, hiring processes, and disciplinary measures.

The **GESI Lead**, with support from the Safeguarding Specialist, ensures that safeguarding measures prioritise gender equality, social inclusion, and victim-centred approaches.

The **Ombudspersons and Safeguarding Specialist** serve as neutral contacts for staff, other personnel, service providers, and partners to report safeguarding concerns confidentially.

The **Director General (DG)**, with support from the Directorate and SMC, has the highest level of accountability in ensuring that ICIMOD's safeguarding policies are fully implemented, resourced, and enforced.

The **Board of Governors** provides strategic oversight and ensures that ICIMOD meets international safeguarding standards and is responsible for responding to safeguarding complaints against the DG, members of the Senior Management Team, or ombudspersons.

2. Policy A: Protection from Sexual Exploitation and Abuse Policy

2.1 Introduction

ICIMOD is committed to preventing and responding to sexual exploitation and abuse (SEA) across all its programmes, partnerships, and community interactions. SEA involves any form of sexual misconduct by ICIMOD staff, other personnel, service providers, and partners against individuals, particularly those in vulnerable positions. It includes sexual exploitation – the abuse of power or trust for sexual purposes, including financial, social, or political gain; and sexual abuse, which encompasses coerced or non-consensual sexual acts, harassment, or assault.

ICIMOD strictly prohibits any exchange of money, goods, or services for sexual favours, the use of children or vulnerable individuals in sexualised imagery, and any form of coercion or abuse for sexual purposes, including abusive or coercive sexual relationships between its staff, partners, or representatives. ICIMOD adopts a victim-centric approach to SEA, prioritising safety, confidentiality and access to support, ensuring the victim is treated with empathy, respect, and without discrimination.

ICIMOD staff, other personnel, service providers, or partners must report any SEA incidents they have witnessed in the course of ICIMOD operations and activities.

All staff, other personnel, service providers, and partners must uphold professional boundaries, integrate safeguarding measures into programme activities, and promote a workplace culture that actively prevents SEA. Safeguarding principles must be embedded in all ICIMOD's programmes, research, and partnerships to ensure the protection of all stakeholders, particularly children and vulnerable communities.

2.2 Risk management and safer programming

ICIMOD integrates SEA risk assessments into all Interventions; this is a mandatory process to identify necessary safeguarding measures, the development of a clear risk management plan for the identified risks,

and the assignment of a safeguarding focal point for implementing mitigation actions. The Heads of Strategic Groups, along with their teams and with support from the Safeguarding Specialist, are responsible for identifying SEA risks during planning and ensuring implementation of risk mitigation measures. This assessment must be completed in collaboration with ICIMOD and its partner organisations before implementing on-the-ground activities or conducting any events to ensure comprehensive safeguarding risk management.

ICIMOD is committed to protecting the dignity and rights of community members engaged with ICIMOD's work by raising awareness about SEA reporting mechanisms among partners and communities, ensuring gender-sensitive programming, and providing safe, confidential and accessible complaints channels in all areas where it operates.

2.3 Partner organisations and safeguarding compliance

ICIMOD will embed the requirement to comply with its Protection from Sexual Exploitation and Abuse (PSEA) Policy in all contracts and partnership instruments, including Letters of Agreement (LoA), Memoranda of Understanding (MoU), and due diligence processes, reinforcing the commitment to preventing exploitation and abuse. Allegations of violations of this policy will be addressed as per the provisions made in these contracts and partnership instruments.

Partners shall be responsible for providing PSEA training for their staff. ICIMOD supports capacity-building efforts where needed and emphasises safeguarding awareness during field missions and joint operations to ensure accountability at all levels.

ICIMOD reserves the right to conduct PSEA due diligence and audits of partners and potential partners to ensure compliance with these safeguarding standards. Non-compliance may result in contract termination or withdrawal of funding.

3. Policy B: Child Safeguarding Policy

3.1 Introduction

ICIMOD is committed to ensuring that all children engaged with or affected by its work are protected from abuse, exploitation, and harm. Child safeguarding refers to the responsibility of ICIMOD staff, other personnel, service providers, and partners to ensure that children are not exposed to harm due to their association with ICIMOD's work.

A child is defined as any individual **under the age of 18**, in accordance with the [United Nations Convention on the Rights of the Child \(UNCRC\)](#).

ICIMOD adopts a child-centred approach in all safeguarding efforts, ensuring the safety, dignity, and best interests of the child are prioritised at every stage – from prevention to response.

3.2 Forms of child abuse and exploitation

ICIMOD recognises the following forms of child abuse:

- Physical abuse – any act causing physical harm or injury to a child
- Sexual abuse – any sexual contact, exploitation, or coercion involving a child
- Neglect – the failure to meet a child's basic needs, including health, education, and protection
- Emotional abuse – acts that cause psychological harm, such as verbal abuse or intimidation
- Child labour and trafficking – the exploitation of children in labour, forced work, or illicit activities

3.3 Child safeguarding commitments

ICIMOD's child safeguarding policy is based on the principles of zero tolerance, duty of care, accountability, and the best interests of the child. The organisation commits to recognising, including, and implementing child safeguarding measures in all relevant institutional policies, programme implementation, in procedures like recruitment, and in partnerships, communications, and engagement processes.

3.4 Ethical communication and content gathering

ICIMOD's [Publications Policy](#) commits the Centre to ensuring that all published work is conducted in an ethical and responsible manner, and the collection of personal and identifying information, including images, videos, and stories of children, is only allowed if explicit informed consent of the individual or of their legal guardian is secured. Verbal consent is acceptable in situations where written consent cannot be acquired or is inappropriate.

ICIMOD's Publications Policy commits the Centre to setting up robust systems to ensure ethical research and publications – and this includes the development of Ethical Image Guidance.

Children's identities and personal stories will be handled with sensitivity, ensuring their safety, dignity, and privacy are never compromised in communications.

3.5 Partner organisations and child safeguarding compliance

Child safeguarding clauses are to be embedded in all contracts and partnership instruments, including LoAs, MoUs, and due diligence processes, reinforcing the commitment to preventing exploitation and abuse. Partner organisations must ensure their staff comply with these requirements and promptly report to ICIMOD all allegations or concerns related to child safeguarding involving their staff/personnel associated with ICIMOD's work. Partner organisations must ensure their staff comply with these requirements in a prompt manner.

3.6 Response and external referral mechanisms

ICIMOD ensures that child abuse allegations against its staff, other personnel, service providers, and partners are addressed with urgency, professionalism, and legal compliance. Child abuse incidents or cases may be referred to the concerned child protection authorities and law enforcement as required.

Complainants and affected families will receive appropriate support, including access to timely medical and psychosocial care, and support for legal recourse when needed.

4. Policy C: Bullying and Sexual Harassment in the Workplace Policy

Workplace bullying/harassment is unreasonable behaviour directed towards a colleague that creates a risk to that individual's health, safety, or wellbeing. It can be verbal, physical, social, or psychological in nature and is intended to intimidate, degrade, humiliate, or undermine the targeted individual's integrity. Workplace bullying/harassment may include persistent criticism, exclusion, excessive monitoring, spreading rumours, or other actions that create a hostile work environment.

Sexual harassment in the workplace refers to any unwelcome sexual behaviour that creates a hostile, intimidating, or offensive work environment. ICIMOD strictly prohibits all forms of sexual harassment, whether verbal, non-verbal, physical, or digital. All allegations will be taken seriously and investigated promptly using a victim-centred approach. Recognising that such cases often lack physical evidence, investigations will focus on the credibility of accounts, contextual factors, and any supporting information, while ensuring confidentiality and protection from retaliation.

ICIMOD enforces a zero-tolerance policy on workplace bullying/harassment and sexual harassment. This means:

- All complaints will be taken seriously, investigated promptly, and acted upon, minimising further trauma or harm to the victim.

- Complainants will be provided with immediate support and protection.
- Perpetrators will face strict disciplinary action, including termination of their employment contract with ICIMOD, and disclosure of the safeguarding violation to any potential future employers.

ICIMOD is committed to fostering a workplace culture of dignity, respect, and gender equity, ensuring that all staff understand and uphold this policy on Bullying and Sexual Harassment in the Workplace.

While ICIMOD respects personal relationships, certain boundaries must be maintained to prevent conflicts of interest and power imbalances.

- ICIMOD recognises that consensual intimate relationships between staff are a personal matter; however, to maintain a professional work environment, any relationship that may affect workplace dynamics or create a conflict of interest, particularly in a supervisory situation – must be disclosed to HR.
- ICIMOD prohibits any form of coercion, favouritism, or abuse of power in workplace relationships.
- ICIMOD staff are expected to adhere to ICIMOD's code of conduct to ensure professionalism and integrity at all times.

5. Policy D: Social Safeguards Policy

5.1 Introduction

ICIMOD is dedicated to fostering sustainable and inclusive development in the HKH region. This Social Safeguards Policy establishes the principles and commitments to which ICIMOD adheres to prevent, mitigate, and address potential social risks associated with its initiatives. This policy aims to prevent unintended adverse impacts on people and promote equitable, inclusive and sustainable development. The procedural details on how ICIMOD ensures social safeguarding will be further elaborated in the relevant internal SOPs.

5.2 Risks

This policy applies to all ICIMOD's work, whether directly implemented by ICIMOD or in collaboration with partners. It covers multiple forms of risks to people, including but not limited to involuntary displacement and loss of livelihood, social exclusion and marginalisation, gender-based discrimination and inequality, human rights violations, labour rights and working conditions, and conflict sensitivity and social cohesion.

5.3 Application

ICIMOD aims to address these risks in the following ways:

- **Involuntary displacement and loss of livelihood** – Ensuring that no community or individual is forcibly displaced or faces loss of access to land, natural resources or property or experiences a disruption in livelihood due to ICIMOD's work.
- **Social exclusion and marginalisation** – Ensure ICIMOD's activities do not exclude vulnerable groups such as Indigenous Peoples, ethnic minorities, persons with disabilities, and economically disadvantaged populations. Recognise, respect, and integrate cultural heritage and Indigenous knowledge.

- **Gender-based discrimination and inequality** – Promoting GESI-responsive approaches and ensuring that women and disadvantaged groups have equal access to participate in ICIMOD's activities.
- **Human rights violations** – Ensuring that all ICIMOD activities are aligned with international human rights standards and do not infringe upon the rights of affected communities.
- **Labour rights and working conditions** – In all ICIMOD activities, ensuring fair labour practices, decent work conditions, and the protection of workers from exploitation and abuse.

Conflict sensitivity and social cohesion – Ensuring ICIMOD activities do not exacerbate existing conflicts in society and address potential community conflicts related to equitable benefit-sharing through a transparent and participatory process.

5.4 Social risk management

To systematically address social risks with a focus on the safety and well-being of affected individuals, ICIMOD follows a structured Social Risk Management Framework. All ICIMOD projects and programmes will undergo a social risk screening process to determine the level of risks involved. For moderate and high-risk levels, ICIMOD must undertake a detailed social impact assessment in collaboration with affected stakeholders. Moderate or high-risk projects will need to develop social safeguard plans and Monitoring and Evaluation plans for effective tracking and monitoring of risks and mitigation measures.

6. Policy E: Research Ethics Policy

6.1 Introduction

This policy outlines ICIMOD's commitment to upholding the highest ethical standards in all research involving human subjects, in alignment with our Strategy 2030 and Medium-Term Action Plan V (2023–2026). It applies to all ICIMOD-funded research, including that conducted by ICIMOD partners.

The policy applies to any research led by ICIMOD or conducted by partners that involves interactions with human subjects through methods such as surveys, interviews, focus group discussions, ethnographic studies, experiments, and others, where personal, sensitive, or identifiable information is collected.

Detailed procedural aspects related to this policy will be outlined in the internal SOP on Research Ethics.

6.2 Core Ethical Principles

Free Prior Informed Consent: Researcher(s) must receive prior informed consent from participants (human subjects) before collecting personal or identifiable information, with a clear understanding of the study's purpose, procedures, risks, and benefits. Consent must be obtained in a language and format suitable for the participant. It must be ensured that consent is freely given and without coercion.

Voluntary Participation: Participation must be entirely voluntary. Participants may decline to answer any question or withdraw from the study at any time without facing consequences. Researchers must clearly communicate this right to participants and respect their autonomy throughout the research process.

Confidentiality and Data Protection: Personal information collected for the study must be anonymised and kept confidential. Data security must comply with applicable regulations and standards.

Do No Harm: Research must minimise any potential risk to participants and prioritise their physical, psychological, and social well-being.

Cultural and Contextual Sensitivity: Research must be conducted with full respect for local cultures, customs, values, and political and environmental contexts. This includes recognising gender power dynamics and avoiding exploitation or misrepresentation of communities.

Safeguarding: Researchers must assess and mitigate risks to vulnerable groups, including women, children, and persons with disabilities. Clear reporting and redress mechanisms must be in place for any harm or abuse. The ICIMOD policies on Protection from Sexual Exploitation and Abuse (PSEA) and Child Safeguarding must be strictly followed while conducting research.

6.3 Research Ethics Committee

ICIMOD's Research Ethics Committee (REC) [equivalent to Institutional Review Board (IRB)], formed by the Director General, is an independent body of experts responsible for reviewing all relevant research protocols involving human subjects where personal or identifiable information will be collected. Approval from the REC is mandatory before commencing such research. The REC ensures impartiality, adherence to ethical principles, and may cancel approvals if the guidelines are violated, prioritising the safety and dignity of the participants.

7. Policy F: Whistleblowing and Incident Management Policy

7.1 Introduction

ICIMOD is committed to ensuring a safe, respectful, and ethical environment by providing a clear framework for reporting and managing safeguarding complaints. This policy outlines key principles of whistleblowing and incident management, while the internal Standard Operating Procedure (SOP) on Whistleblowing and Incident Management will contain detailed procedural guidance on the mechanisms concerning whistleblowing, conducting investigations, and disciplinary actions. The Whistleblowing and Incident Management Policy and SOP apply to all policy violations with regard to *Policy A: PSEA*, *Policy B: Child Safeguarding*, *Policy C: Bullying and Sexual Harassment in the Workplace*, *Policy D: Social Safeguards*, and *Policy E: Research Ethics*.

Whistleblowing can be:

- **Named** (where the whistleblower identifies themselves), or
- **Anonymous** (where the whistleblower chooses to remain unidentified)

ICIMOD's whistleblowing and incident management framework is built on the following core principles:

- Confidentiality – Safeguarding the privacy of all whistleblowing reports, investigations, and personal data
- Victim-centred approach – Prioritising the dignity, safety, and well-being of the complainants, through confidential, trauma-informed, and non-retaliatory processes. Non-retaliation – Protecting individuals who report concerns in good faith from any form of retaliation
- Timely response – Ensuring all safeguarding complaints are addressed promptly and effectively
- Independence and fairness – Conducting impartial investigations free from conflicts of interest
- Zero tolerance – Taking strict disciplinary action against proven misconduct while ensuring that victims receive appropriate remedies and access to support services

7.2 Reporting channels

ICIMOD accepts whistleblowing/complaints through any of the following reporting channels:

- Ombudsperson: ombudsperson@icimod.org
- Head of Human Resources and Organisational Development: HeadHROD@icimod.org
- Director General: DirectorGeneral@icimod.org
- Director – Administration, Finance and Operations (for concerns related to financial fraud and corruption): DirectorAFO@icimod.org

In cases where a whistleblowing/complaint involves the Director General (DG), the matter can be reported directly to the Chair of the Programme Advisory Committee and/or the Chair of the ICIMOD Board of Governors.

7.3 Protection against retaliation

ICIMOD enforces a strict non-retaliation policy, fostering a safe environment for whistleblowing/reporting complaints. Any form of retaliation against complainants or witnesses will result in disciplinary action. Examples of retaliation include:

- Negative performance evaluations
- Workplace harassment, exclusion, or intimidation
- Threats or coercion

Victims will be supported with appropriate protective measures, including psychosocial support, safe spaces, and legal guidance where required.

7.4 Managing conflicts of interest

To maintain investigative integrity, any individual involved in the incident management process with a conflict of interest must recuse themselves. Conflicts of interest may arise due to:

- Personal relationships with the complainant or accused
- Prior involvement in the case

For complex or sensitive cases, such as those involving child abuse cases or where a senior management team member is involved, ICIMOD may appoint external expert investigators to ensure impartiality.

7.5 Addressing malicious complaints

While fostering a culture of accountability, ICIMOD recognises the harm caused by false allegations. False complaints made with malicious intent, as determined through an investigation, will result in disciplinary action. All reports will be thoroughly reviewed following this policy, as well as procedures outlined in the Whistleblowing and Incident Management SOP, to ensure a fair and just process for all parties involved.

ICIMOD will ensure that due process is followed and that the rights of both complainants/victims and the alleged perpetrator are protected throughout the process. Victims making complaints in good faith will not be penalised, even if allegations are not substantiated after investigation, provided that the allegations are not malicious and that they do not result in proven physical harm, emotional trauma, or economic loss for the alleged perpetrator as a result.

7.6 Data protection and confidentiality

To ensure the protection of sensitive information, ICIMOD enforces strict data storage protocols in alignment with international best practices and legal requirements. All safeguarding case records are securely maintained by the Head of HROD in a restricted-access database. Only the Head of HROD and the Director General have access to safeguarding-related information, and they may share it with other parties strictly on a need-to-know basis.

For legal and accountability purposes, safeguarding records are retained in HROD by the Head of HROD in a secure physical and electronic form for a minimum of **five years**. When incident reports are used, data is anonymised and de-identified to protect the victim's identity.

Incident reports used for organisational learning and policy improvements are anonymised to prevent the identification of individuals. Anonymised data may be analysed by the Directorate and SMC to enhance safeguarding policies without revealing personal details. To further protect safeguarding data, ICIMOD implements cybersecurity measures such as encryption and two-factor authentication.

All ICIMOD staff, other personnel, service providers, and partners involved in handling safeguarding reports are required to sign confidentiality agreements.

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