



INVISIBLE CHILDREN
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Protection from Sexual Exploitation and Abuse (PSEA) Policy

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Applies to	All IC Personnel and Suppliers
Approved by	Lisa Dougan, President and CEO Anna Prow, Chief Operations Officer and acting CEO
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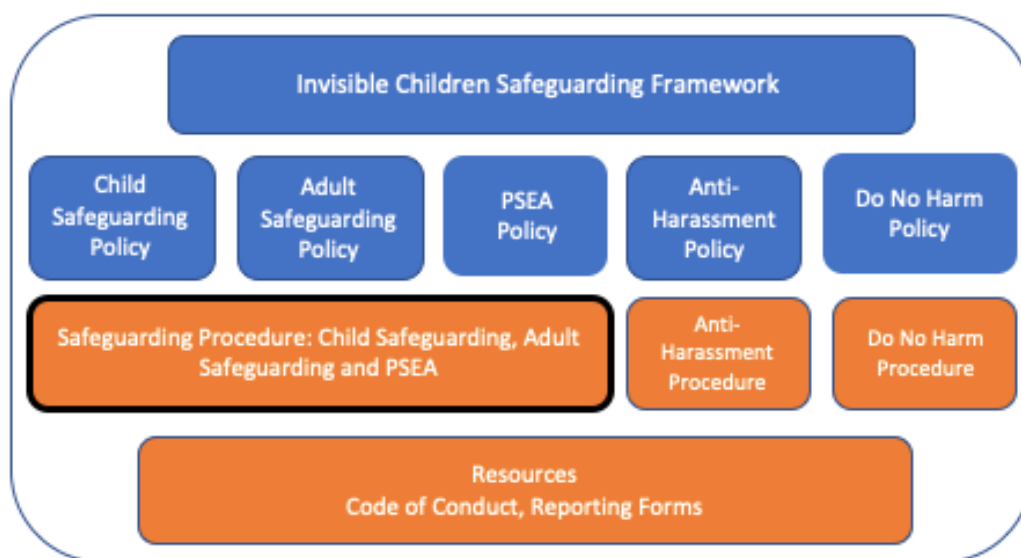
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Safeguarding Framework

This document is part of Invisible Children's Safeguarding Framework that consists of this policy, procedures and resources.



Policy Introduction

Invisible Children (IC) has a zero tolerance for sexual exploitation and abuse. IC will not tolerate its personnel, suppliers, or any other representatives associated with the delivery of its work to engage in any form of sexual exploitation or abuse. Vulnerable adults, women, and children are particularly at risk of sexual exploitation and abuse. IC is committed to protecting all communities with which the organisation works with from sexual exploitation and abuse at all times.

This policy ensures that all IC personnel and suppliers are aware of their roles and responsibilities in keeping communities and stakeholders safe from any form of sexual exploitation or abuse. The policy clarifies definitions and responsibilities regarding prohibited behaviour and the associated PSEA procedures outline the reporting and investigation processes.

Purpose

To set out IC's behavioral expectations and guiding principles with respect to preventing and responding to sexual exploitation and abuse (SEA) of participants in IC programs.

Scope

This policy applies to all IC Personnel worldwide, and to Suppliers and Supplier Personnel to the extent set out below.

Accountability Statement of Policy

IC does not tolerate any form of sexual exploitation and abuse of any person, adult or child, who is served by IC programs or who IC Personnel encounter in the implementation of those programs, including research. IC is committed to upholding the United Nations Secretary General's Bulletin on Special Measures for protection from sexual exploitation and abuse (ST/SGB/2003/13) and the six Core Principles of the UN Inter-Agency Standing Committee on PSEA (2002).

The Chief Executive Officer (CEO), the Global Senior Leadership Team, and the directors and managers of IC are responsible for the implementation of this policy. It is the responsibility of all representatives of IC to raise any concerns regarding sexual exploitation and abuse. IC takes all concerns and complaints seriously and will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

Policy Approach

This policy details how IC achieves its obligations and applies to all personnel and suppliers regardless of their location.



Framework Principles

This policy and IC's Safeguarding Framework are guided by the following principles:

Safeguarding

IC is committed to recognize all community members (as outlined in the definitions) as having the right to safeguarding and protection from sexual exploitation and abuse, irrespective of ability, ethnicity, faith, gender, sexuality, and culture. A key principle within this is that all processes are survivor led. IC commits to survivors leading the complaint process where it is possible and appropriate to do so.



Shared Responsibility

IC shares the responsibility for implementation and improvement of its Safeguarding Framework to ensure its Safeguarding and PSEA policies are effective in reducing the risks to beneficiaries and communities. As such, a failure at one level of the organization constitutes a failure at all levels of the organization.



Effective Communication

IC effectively communicates with all personnel and suppliers in simple and accessible language to create a positive and accessible culture where responsibilities for

Safeguarding and PSEA are clear.



Continuous Improvement

IC provides assessment, reflection and feedback mechanisms to inform the organisation of any improvements that can be made to policies and practices. These mechanisms include quarterly incident reviews, regular safeguarding audits, as well as regular policy review and refresher training.



Integrity, Dignity and Respect

IC creates a work environment in which the values of integrity, dignity, and respect for all staff, associates, and partners, in all locations are integrated into every aspect of the organisation. Included in this is the commitment to respectfulness and impartiality when listening to the concerns and complaints of survivors of sexual exploitation and abuse.



Zero Tolerance

IC has zero tolerance for any forms of sexual exploitation and abuse.



Confidential

IC is committed to confidentiality. Information will not be shared outside of the Safeguarding Committee unless it is absolutely necessary, and the safety of the person involved is a concern.



Do No Harm

IC is committed to prevent and mitigate any negative impact of its actions on the communities where we work and to include efforts to engage and empower persons of concern in decisions that affect their lives.

SEA Prevention Commitment

IC is committed to create a friendly, safe, and trusting environment where respect and dignity of each individual associated with the organization is upheld. Prevention is an integral part of IC's PSEA policy since the main aim is to prevent any such incident from occurring. Response is to be considered only if preventive measures fail. Preventive measures include, but are not limited to:

- Dissemination of the policy to all stakeholders associated with IC;

- Translation of the policy in the local language to ensure it is understood by all stakeholders;
- Orientation of all stakeholders to the contents of the policy through interactive discussions, sensitization or training;
- Additional training and coaching of staff with the specific responsibility to facilitate wider dissemination and understanding of issues related to sexual harassment/exploitation;
- Linking the policy implementation to other organizational initiatives that contribute to creating a culture of trust and security, promoting equity and respect thereby creating healthy work environments and work relationships;
- Including the policy in employee induction program;
- Enforcing the policy among all IC personnel and suppliers.

Policy Implementation

Governance

The CEO, together with the Board of Directors, has ultimate responsibility for this policy and the PSEA Framework and its proper management, using a systematic approach. As such, the CEO and the Board of Directors will receive a summary of any reported sexual exploitation and abuse incidents and follow-up measures taken at each Executive Team meeting and Board meeting, respectively.

Invisible Children's Obligations

IC believes that all people have the right to live free from sexual exploitation and abuse and IC will not tolerate its personnel or suppliers engaging in any sort of behaviour that puts beneficiaries or communities at risk. To that end, IC commits to:

1. Creating a safe culture for both those it serves and those who work for and represent the organization;
2. Ensuring that all personnel and suppliers are informed of, and trained in the policy and procedure, and fully compliant with the PSEA policy;
3. Following through on any complaints and concerns in a timely manner and taking each complaint seriously;
4. Sensitizing personnel and suppliers to develop awareness as well as an understanding of when and how to report any concerns or complaint;
5. Ensuring zero tolerance towards sexual exploitation and abuse;
6. Building a culture of dignity, honour and respect, where all those who work with and are served by IC feel empowered to report complaints;
7. Educating personnel and suppliers that sexual exploitation and abuse constitute gross misconduct and are grounds for termination of employment and possibly legal action;
8. Providing information on how to report complaints and the investigation procedure;
9. Ensuring that all personnel and suppliers have access to the PSEA policy and procedures as well as all other related safeguarding policies;
10. Ensuring that all personnel and suppliers have signed and acknowledged that they have read and understood the policy.

Personnel, Managers and Suppliers Responsibility

All IC personnel and suppliers are required to be informed of and trained in the policy and procedures and adhere to this policy at all times; and they are obliged to report any suspicions of sexual exploitation and abuse of others. All Personnel and Suppliers are required to sign the associated Code of Conduct and a formal acknowledgement of having read and understood the policy.

Managers also have a responsibility to model behaviours that uphold the dignity and rights of every individual and support and develop systems that maintain an environment where all parties involved with IC understand how to behave, how to raise complaints and concerns, and what action will be taken.

Recruiting and References

IC, in compliance with applicable laws, will take all reasonable steps to prevent perpetrators of SEA and child abuse from being hired, re-hired or re-deployed by IC.

As allowed by applicable labour law, IC Personnel must immediately disclose convictions or guilty pleas of any offense that relates to sexual exploitation and abuse.

Safeguarding Committee

IC is committed to ensuring that Program Participants – in both humanitarian and development settings – have culturally appropriate, safe, confidential and accessible ways to report SEA claims.

IC has established a Safeguarding Committee at the HQ level as well as in each field location. The Safeguarding Committee is comprised of the following members:

1. One female member in a Senior Management role;
2. Not less than two members from across different departments in the country program recognized by their peers as having demonstrated a commitment to the cause of women;
3. Another member who is an external expert in harassment, sexual exploitation or abuse.

The Safeguarding Committee, at HQ level as well as in each field location, will ensure that there is diversity and equal gender representation on the committee.

The Safeguarding Committee will be trained in all of the Safeguarding policies as well as reporting and investigations.

The Safeguarding Committee will raise awareness with program participants and communities where programs are implemented, employees and related personnel about how to use the safeguarding mechanism. They will also be responsible for receiving and investigating any safeguarding complaints, including SEA.

Confidentiality of Complaint

IC will keep SEA reports confidential to the extent possible to ensure the privacy of the individuals involved, maintain integrity and fairness of the investigation, and prevent embarrassment, further discrimination or harassment, or retaliation, while still fulfilling its obligations to investigate and end any sexually exploitative or abusive conduct.

Confidential or sensitive information obtained by any staff member during the course of an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to other.

Nothing in this policy is intended as a guarantee of absolute confidentiality, nor is it intended to curtail employee rights under any applicable laws to discuss work-related matters.

Whistleblowing

As referred to in IC's whistleblowing policy, all disclosures will be treated in confidence. Reports may be submitted anonymously for investigation via email to whistleblower@invisiblechildren.com, which goes directly to the Chair of the IC Board of Directors.

Prohibited Retaliation

IC maintains a zero-tolerance policy for retaliation against anyone for reporting sexual exploitation or abuse, assisting in making a complaint, or participating in an investigation.

Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be SEA or any other violation of this policy, assisting others in reporting SEA or policy violations, or participating in investigations under this policy.

Non-retaliation protection includes all Program Participants. No Program Participant or community member will be denied participation in a program or access to aid for reporting suspected or known sexual exploitation and abuse or participating in a SEA investigation.

Suspected retaliation should be promptly reported via the Safeguarding Committee either orally or in writing, or via email to whistleblower@invisiblechildren.com. Complaints of retaliation will be promptly investigated.

IC Personnel who engage in retaliation will be subject to disciplinary action up to and including separation of employment or other relationship with IC

Examples of retaliation:

Some examples of retaliation include but are not limited to the following:

- Termination, demotion, disadvantageous transfers or assignments, refusals to promote, threats, reprimands, or negative evaluations.

- Co-worker hostility or retaliatory harassment, which includes intimidation, gossip, rumours, insults, or otherwise offensive conduct that would subject a person to ridicule or humiliation.
- Any action or combination of actions that is reasonably likely to materially and adversely affect an employee's job performance or opportunity for advancement.

PSEA Commitments

Sexual exploitation and abuse of Program Participants by humanitarian and development workers constitute acts of serious misconduct and are therefore grounds for termination of employment and potential referral to law enforcement authorities. IC will take preventive measures, investigate SEA complaints, and take appropriate action to stop any SEA that may occur against any Program Participant, and will do so in a manner that is sensitive to the special needs of children and adolescents.

Sexual Exploitation: Any form of sexual exploitation is prohibited including:

- Buying Sex: Exchange of money, material assistance, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitive behaviour is prohibited;
- Profiting from Sexual Exploitation: Any monetary, social or political gain from sexual exploitation is prohibited.

Sexual activity with children and vulnerable adults: Sexual activity with children (persons under the age of 18) is always prohibited, even if they are not Program Participants, regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.

Sexual activity with vulnerable adults, as outlined in the definitions, is also prohibited.

Consensual sexual relationships: Consensual sexual relationships between IC Personnel and adult Program Participants are strongly discouraged as they are subject to inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian and development aid work.

IC Personnel who engage in consensual sex or sexual activities with an adult Program Participant must disclose this conduct to their supervisor. Failure to report such conduct may lead to disciplinary action pursuant to IC's policies and procedures.

Child Marriage: Any IC Personnel or suppliers who engage in child marriage (marriage to anyone under the age of 18) will be in violation of the PSEA policy. As per the definition of child marriage, anyone under the age of 18 is not able to give or withhold consent and is considered a form of sexual violence. Any staff married to a child under the age of 18 as per the custom or law of their country, before the IC PSEA policy came into force will not be subject to disciplinary action. IC, however, prohibits any such relationship from occurring once the PSEA policy came into effect.

Grooming and/or Coercion: Any grooming and/or coercion of a child or vulnerable adult for the purposes of obtaining sex is prohibited.

Sexual Harassment: Any act of sexual harassment including unwelcome sexual advances or requests for sexual favours is prohibited both under the PSEA policy and the Anti-Harassment policy.

Sexual Violence: Any acts of sexual violence as outlined in the definitions in prohibited. This includes, but is not limited to, sexual violence including intercourse, sexual touching, and threats of sexual violence.

Physical/Emotional Abuse: As outlined in both the Child Safeguarding and the Adult Safeguarding policies, any physical or emotional abuse is prohibited.

This list may be expanded at any time and details will be communicated with IC's personnel and suppliers.

Examples of Conduct Constituting Sexual Exploitation and Abuse

Examples of sexual exploitation and abuse of a Program Participant include but are not limited to the following:

- Touching, kissing, or bodily contact in a sexual way by force or coercion;
- Taking photographs that are sexual in nature (including degrading or nude photographs);
- Physical assault of a sexual nature, including oral sex or attempted or completed rape defined as "penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim";
- Offering preferential treatment or promises of preferential treatment or goods to a Program Participant for submitting to sexual conduct, including soliciting or attempting to solicit any Program Participant to engage in sexual activity for compensation or reward, or promise of a relationship or marriage;
- Threats or demands that a person submit to sexual requests as a condition of continued program participation or to avoid loss of program-related benefits;
- Even in instances when sexual contact was initiated by a Program Participant, IC Personnel are bound by all the provisions of this policy.

The list of prohibited actions set out above is not intended to be exhaustive. Other types of sexually exploitive or sexually abusive behaviour, and other forms of humiliating, degrading, or exploitative behaviour induced by force, fraud, or coercion, may be grounds for administrative and disciplinary action.

Other conducts that violate this Policy

In addition to SEA, retaliation, and other prohibited conduct outlined above, it is also a violation of this policy for IC personnel or suppliers to:

- Attempt to discourage, interfere, or impede any individual from reporting SEA.
- Discourage or impede any individual's participation in any investigation under this policy.

- Knowingly provide false information or make false claims to investigators.

Consequences of Policy Violations

IC Personnel who violate this policy are subject to disciplinary action up to and including immediate termination of employment or other relationship with IC.

IC may take legal action when required, against IC Personnel who have been found to commit SEA, including referral to the relevant authorities for appropriate action, including criminal prosecution, in all relevant jurisdictions.

Program Participants who violate this policy may be removed from IC programs and barred from participation in other IC programs.

Violations of this policy by Suppliers or Supplier's Personnel may result in IC terminating the Supplier's contract with IC. Further, IC may pursue any contractual or other legal or equitable remedies that may be available.

Support to Victims/Survivors of SEA

IC Personnel involved in implementing this policy must ensure that responding to sexual exploitation and abuse does not jeopardize the safety of a victim of SEA or an accused Respondent. Upon receipt of a complaint, IC will make a swift assessment concerning the health and safety of the individuals involved and implement temporary remedies necessary for safety. During investigation (see Procedures document), IC will take measures to protect any victims/survivors or potential victims of SEA.

IC will provide referrals for support and assistance to Complainants of SEA. This may include medical treatment, legal assistance and psychosocial support as appropriate and according to the wants and needs of the victim/survivor whilst also considering confidentiality, cultural sensitivities and victim/survivor safety.

PSEA Reporting Procedures

The associated procedures document outlines how to report any incidents of sexual exploitation or abuse.

Failure to Report

The Code of Conduct as well as the InterAgency Standing Committee (IASC)¹ Core Principles on PSEA state that it is the duty and the responsibility of all personnel and suppliers to report any PSEA concerns. Failure to report may lead to disciplinary action, up to and including immediate separation of employment.

¹ <https://interagencystandingcommittee.org/>

Policy Review

To meet with sector best practice, IC agrees to review this policy and the entire PSEA Framework every two years, as a minimum. It is the responsibility of the Global Director of Operations and Compliance to complete this review, in collaboration with any key internal stakeholders or external third-party providers.

For policy interpretation or questions, please contact the Chief Operations Officer aprow@invisiblechildren.com

Associated Documents

- IC's Safeguarding Framework:
 - o Child Safeguarding, Vulnerable Adults Safeguarding, and Sexual Harassment Policies
 - o Safeguarding Procedures and Resources
- Code of Ethics & Conduct
- IC's Combating Trafficking in Persons Policy

Appendix

Appendix A – Definitions

APPENDIX A – Definitions

Child: Any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.²

Child Emotional Abuse: Inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.³

Child Marriage: The custom of marrying young children, particularly girls, is a form of sexual violence as children are unable to give or withhold consent.

Child Sexual Abuse: The involvement of a child in sexual activity that s/he does not fully comprehend, give informed consent to, or for which s/he is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. It may include, but is not limited to, the inducement or coercion of a child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or other lawful sexual practices or the exploitative use of pornographic performances and materials.⁴

Coercion: Coercion covers a whole spectrum of degrees of force. Apart from physical force, it may involve psychological intimidation, blackmail or other threats. For instance, threats of being dismissed from a job or of not obtaining a job that is sought. It may also occur when a person is unable to give consent. For example, while drunk, drugged, asleep or mentally incapable of understanding the situation.⁵

Complainant: A person or party who makes a complaint.

Consensual: Involving or based on mutual consent.

Consent: Agreement to sexual acts, freely given without any element of force, fraud, deceit, or coercion - whether physical, emotional, economic or social in nature. The two necessary components of consent are that it be both *informed* and *voluntary*, meaning involved persons fully understand the sexual act to which the agreement of "yes" is made, without any use of influence, force, or coercion. Children are minors and can never give consent to a sexual relationship with an adult.

² Definition of child from the InterAgency Standing Committee (IASC) Guidelines to implement Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel, March 2013.

³ CARE International PSEA Policy 2017

⁴ United Nations Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).

⁵ World Health Organization World Report on Violence and Health (2002)

Grooming: The behaviour that an offender uses to procure sexual activity from a child. It can include building trust with children and/or their carers to gain access to children to sexually abuse them.

Invisible Children (IC) Personnel: IC employees, officers, members of the Board of Directors, interns and fellows (paid or unpaid), volunteers, agents, and other individuals acting on behalf of IC.

Invisible Children (IC) Managers or Supervisors refers to Invisible Children staff who have responsibility for line managing or supervising the work of Invisible Children Personnel or Invisible Children Suppliers.

Invisible Children (IC) Suppliers: Any IC contractor, consultant, vendor, service provider, subcontractor, subrecipient or other partners.

Invisible Children (IC) Suppliers' Personnel: A Supplier's employees, interns and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on Supplier's behalf.

Modern Slavery: Slavery is a situation where a person exercises (perceived) power of ownership over another person. Related terms include forced labour, which covers work or services that people are not doing voluntarily but under threat of punishment; human trafficking, which involves deceptive recruitment and coercion; and bonded labour, which is demanded in repayment of a debt or loan. Modern slavery encompasses a spectrum of labour exploitation, ranging from the mistreatment of vulnerable workers to human trafficking to child labour and forced sexual exploitation.⁶

Neglect: Failure to provide a child or vulnerable adult with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

Online Grooming: Grooming may be in person as above, or online where the groomer sends electronic messages with the goal of engaging the child in sexual activity.

Physical Abuse: It occurs when a person purposefully injures or threatens to injure a child or vulnerable adult. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

Program Participant: Any adult or child who is served by IC programs, or has contact with IC Personnel, Suppliers, or Supplier Personnel in connection with or as a result of IC's programs or business activities.

Respondent: A person or party against whom the complaint is made.

⁶ Oxfam PSEA Policy 2018

SEA: Sexual exploitation and abuse (see sexual abuse; sexual exploitation).

Sexual Abuse: Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.⁷

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.⁸

Sexual Harassment: Sexual harassment includes 'unwelcome sexual advances, requests for sexual favors, and other conduct that creates a coercive, hostile, intimidating, or offensive work environment'.⁹ The harassment of a sexual nature may be directed to a person of the same or opposite sex.

The key elements are that the behaviour is **uninvited**, **unreciprocated** and **unwelcome** and causes the person involved to feel threatened, humiliated or embarrassed. The behaviour may also be determined to be sexual violence and harassment if:

- Submission to such conduct is explicitly or implicitly made a term or condition of employment.
- Submission to or rejection of this conduct is used as a basis for an employment decision affecting the staff.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Please refer to Invisible Children's Anti-Harassment policy & procedure for more information.

Sexual Violence: Sexual violence is¹⁰:

- Any sexual act or attempt to obtain a sexual act
- Unwanted sexual comments or advances or acts to traffic that are directed against a person's sexuality using coercion by anyone, regardless of their relationship to the victim, in any setting, including at home and at work.

Three types of sexual violence are commonly distinguished: sexual violence involving intercourse (i.e. rape), contact sexual violence (i.e. unwanted touching, but excluding intercourse) and noncontact sexual violence (i.e. threatened sexual violence, exhibitionism and verbal sexual harassment). While coerced sex may result in sexual

⁷ 1 Secretary-General's Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse (2003)

⁸ Ibid.

⁹ SEXUAL HARASSMENT IN THE HUMANITARIAN CONTEXT Dr. Linda Wagener, Senior Consulting Psychologist, Headington Institute April 25, 2012

¹⁰ World Health Organization definition 2012

gratification for the perpetrator, its underlying purpose is to express power and dominance over the other person.¹¹

Vulnerable adults: Vulnerable adults are defined as:

- Those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or
- Who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

Vulnerable Adult Abuse: is defined as someone “who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation”. Vulnerable Adult Abuse can take many forms, including: physical, sexual, psychological, financial/ material, discriminatory, domestic abuse and self-neglect.¹²

A handwritten signature in black ink, reading "Anna D. Proctor". The signature is written in a cursive, flowing style. The first name "Anna" is written in a larger, more prominent script, followed by "D." and "Proctor". The signature is positioned in the lower-left quadrant of the page.

¹¹ World Health Organization Global Status Report on Violence Prevention (2014)

¹² Department of Health and Social Care No Secrets: guidance on protecting vulnerable adults in care