



# SAFEGUARDING POLICY

VERSION: 3.0



## Policy Summary

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| <b>Background</b>       | <p>The need to safeguard employees, volunteers, children and or other representatives in the course of carrying out the business of auctioneering cannot be over emphasized.</p> <p>Accordingly, efforts are continually made to ensure the foregoing stakeholders do not experience any harm while interfacing with I-Naira.com; whether directly (Office space, warehouses etc) or indirectly (Clients' locations; offices, warehouse etc) as the case maybe.</p> <p>Consequently, I-Naira.com has put in place several guidelines, processes and or procedures to safeguard employees, volunteers (largely support staff undergoing internship) and other associated persons from harm. Thus, management periodically reviews the Safeguarding policy to complement associated procedures within our work environment.</p> <p>At I-Naira.com, our steadfast commitment to the highest ethical and business standards, as set forth in our Safeguarding Policy, underlines everything we do. Whether we're collaborating with our partners or interacting with our co-workers, we understand that behaving ethically is the cornerstone of our reputation, making it possible for we to deliver the value bargain promised to both our sellers (vendors) and buyers.</p> |
| <b>Related policies</b> | <ul style="list-style-type: none"><li>• Data protection policy (Section 3 and 4)</li><li>• Code of Conduct (section 4.1.5)</li><li>• Recruitment and talent attraction policy and procedures (Section 5.8)</li><li>• IT policy and procedures (Section 5 and 6)</li><li>• Anti-corruption and integrity policy and procedures (section 2)</li><li>• Whistleblowing policy</li><li>• Disciplinary policy and procedures</li><li>• Terms of reference for Designated Safeguarding Officers</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |



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## 1. Introductions

**Safeguarding** is the responsibility that an organization must ensure that their employees and volunteers, partners, vendors, operations do no harm to children, young people or vulnerable adults nor expose them to abuse or exploitation.

This means not exposing them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organization has about the safety of children or vulnerable adults within the communities in which they work are dealt with and reported to the appropriate authorities.

Safeguarding is also the responsibility that an organization has for protecting its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm, abuse or inappropriate behavior such as bullying and harassment.

**Child protection** is a central part of but not separate from safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or setup of work. It also includes measures and structures designed to prevent and respond to abuse.

I-Naira.com endorses the United Nations Convention on the Rights of the Child (UNCRC) and agrees that all the rights guaranteed by it must be available to all children without discrimination with reference to article 19 which accords equal rights to protection for children from abuse.

For the purposes of this policy and associated procedures, the term “child” or “children” refers to a person or persons under the age of 18 years.

## 2. Policy Statement

I-Naira.com registered as i-Naira Integrated Resources Ltd in Nigeria, have zero-tolerance for abuse, harassment and exploitation of children, vulnerable adults and employees; and will not tolerate actions or practices that undermine the safety of staff, volunteers, partners, buyers and sellers on I-Naira.com platform.

While we are not pre-occupied with processes failing, we are at the same time proactive and agile enough to put in place reasonable measures to ensure the safety and well-being of our employees, volunteers and the vulnerable people with whom its work brings it into contact. This includes and is not limited to systems, policies and procedures to prevent, report and respond to concerns raised adequately.

At I-Naira.com, safeguarding is everyone's responsibility and it has a social, moral and legal responsibility to protect and safeguard the welfare of children, young people and adults in vulnerable situations with whom its work



brings it into contact. It will, therefore, ensure that the provisions of this policy are cascaded to those associated with the delivery of its work.

Any breach of this policy will be taken seriously and treated as a disciplinary matter, which may result in immediate termination of employment or contract, and reporting to the police, relevant regulatory authority and/or other body.

### **Key principles**

In line with the above statement, I-NAIRA.COM Auction fully supports and will embed the following key principles in relation to safeguarding:

- a) Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinions, national, ethnic or social origin, property, disability, birth or other status.
- b) The best interests of the child, vulnerable adult or victim must be paramount and shall be the primary consideration in all decision making.

### **3. Commitments**

- a) I-Naira.com will meet its obligations regarding its duty of care towards children, vulnerable adults and employees and act where it believes that a child or vulnerable adult in contact with i-Naira's auction activities, or employee is at risk or is harmed.
- b) I-Naira.com takes all concerns, suspicions and allegations of abuse or harm seriously and will respond to them promptly, fairly and consistently.
- c) I-Naira.com will put in place appropriate measures including specific policies and procedures, induction and training, safer recruitment, accountable and transparent systems of response, reporting and learning when risks materialise; to ensure, as far as possible, the safety and wellbeing of their employees. Taken together, these measures will ensure that I-Naira.com's organizational culture continues to emphasise that safeguarding is of paramount importance.
- d) I-Naira.com will ensure that when working with or through partners or subcontracted agencies, their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy. Partners will be informed about and expected to comply with this policy and any breach by partners of this will result in suspension or termination of their relationship with I-Naira.com.
- e) The Safeguarding Administrator will keep all information anonymous or



confidential to the extent practicable. Matters reported to the Safeguarding Officer are taken very seriously and are reviewed promptly and fairly.

#### 4. Purpose of this policy

The purpose of this policy is to provide guidance to those involved in managing organizational safeguarding concerns.

This policy and its associated procedures set out how I-Naira.com will deal with safeguarding issues which give cause for concern and the type of actions that I-Naira.com will take to manage issues and provide support.

It is intended to ensure all I-Naira.com employees and partners have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which I-Naira.com operates and ensure accountability in this crucial aspect of work.

The document also provides assurance that we will take any reported concerns seriously and will ensure that its staff are kept safe.

#### 5. Scope of the policy

This policy applies to all staff directly employed by i-Naira Integrated Resources Ltd and associated personnel whilst engaged with work related to I-Naira.com, including but not limited to the following: partners, consultants, volunteers and contractors (together, "I-Naira.com Personnel").

All such I-Naira.com Personnel are required to acknowledge that they are aware of, have understood, and will comply with the contents of this policy. Such acknowledgment will be provided through their contractual arrangements with I-Naira.com.

#### 6. I-Naira.com Designated Safeguarding Administrators

I-Naira.com has a designated Board-level Safeguarding Director who is responsible and accountable for issues reported across the organization.

I-Naira also has a designated Safeguarding Officer and a Safeguarding Officer Alternate, to whom any safeguarding issues can be referred. The Safeguarding Officer is tasked with keeping track of, and addressing appropriately, any issues brought to their attention, escalating issues for resolution where necessary.

The Director HR and Talent Management is responsible and accountable for safeguarding standards including defining the safeguarding policies and procedures that must be in place.



In addition to the Designated Safeguarding Officers:

- The **Chief Auctioneer at I-Naira.com** is ultimately responsible for ensuring the effective implementation of this policy.

## 7. Reporting a safeguarding concern

If I-Naira.com Staff Members receive an allegation, report or concern or have a suspicion that someone is suffering or is likely to suffer significant harm, no matter what the cause, they should seek the advice and assistance of the designated Safeguarding Officer setting out the basis of the suspicion as clearly as possible. This should be done immediately without awaiting confirmation of concerns.

Staff Members who are unsure of whether to pass on a concern to the Safeguarding Officer may wish to talk first to their manager. The decision as to whether to pass on the concern to the Safeguarding Officer or their line manager, however, is the responsibility of the staff member who has received an allegation, concern or report of a safeguarding issue.

If Personnel who are not I-Naira.com Staff Members, or any other external parties, receive an allegation, report or concern or have a suspicion that someone is suffering or is likely to suffer significant harm, no matter what the cause, they should seek the advice and assistance of their main contact at I-Naira.com, setting out the basis of the suspicion as clearly as possible. This should be done immediately without awaiting confirmation of concerns.

However, if their main contact is implicated in the safeguarding matter, they should refer the matter instead to the Chief Auctioneer at I-Naira.com. Again, this should be done immediately without awaiting confirmation of concerns.

## 8. Handling a safeguarding concern

I-NAIRA.COM Auction Staff Members who receive a safeguarding concern, whether emanating from I-NAIRA.COM Auction Personnel or an external party, must immediately and without attempting to investigate concerns or allegations themselves report it through appropriate channels to the Safeguarding Officer.

All safeguarding concerns raised will be listened to sensitively and in a confidential manner.

It is the remit of external authorities rather than anyone connected with I-NAIRA.COM Auction to investigate safeguarding concerns where it is



suspected that a crime has been committed. I-NAIRA.COM Auction is not an investigating authority for safeguarding issues where a crime is suspected. Members of I-NAIRA.COM Auction Personnel should not make referrals to external authorities other than consult with the Safeguarding Officer and after considering the wishes of the adult survivor.

Such referrals must be made to the relevant law enforcement agency to ensure that appropriate protection and support is given to the vulnerable individual and that any evidence is collected in accordance with the law.

## 9. Investigations

Investigations are an integral part of maintaining an ethical culture. All alleged violations of the Safeguarding Policy will be investigated. The scope and nature of those investigations will be determined by I-NAIRA.COM Auction's Chief Executive Officer, working with the Designated Safeguarding Officers, and will vary depending on the specific details of the alleged violation.

When I-NAIRA.COM Auction becomes aware of an alleged violation of the Safeguarding Policy, the matter will be escalated immediately to the Director of HR and Chief Executive Officer. They will then develop an investigation plan that may require assembling a cross-functional investigative team with subject-matter expertise. Although the Director of HR and Chief Executive Officer will lead safeguarding-related investigations, they may—at their discretion—direct a subject matter expert in a different pillar/ business function to conduct all or part of an investigation in certain circumstances, although will retain oversight of the matter, nonetheless.

What you can expect from I-NAIRA.COM Auction:

- a) I-NAIRA.COM Auction will handle all investigations in an appropriate, confidential, and expeditious manner to ensure that individuals are treated fairly and with respect.
- b) I-NAIRA.COM Auction has zero tolerance for retaliation. Retaliation is not allowed against any staff or personnel for reporting a suspected violation or for participation in a safeguarding violation investigation. Staff and personnel, regardless of seniority or status, who take part in retaliatory activities will be subject to disciplinary action and could lose their jobs.

A safeguarding allegation, if upheld, will almost always result in a staff member being dismissed on grounds of gross misconduct.

What I-NAIRA.COM Auction expects from you:

- a) Cooperate fully with the investigation when requested and answer



- questions truthfully and to the best of your ability.
- b) Respect the confidentiality of the investigation process.
  - c) Do not submit false accusations. Just as retaliatory behavior is not permitted, knowingly submitting a false report will subject you to disciplinary action.
  - d) If asked to participate in an investigation, keep the investigation confidential. Do not spread information or participate in or perpetuate rumours related to any aspect of the matter.
  - e) Do not carry out your own investigation. Report all suspected violations to I-NAIRA.COM Auction's Safeguarding Officer or Director of HR and Talent Management.

## 10. Survivor support

I-NAIRA.COM Auction will provide appropriate support to the survivor(s) of safeguarding incidents. This will be provided as a duty of care even if a safeguarding matter has not yet been investigated. Support will be provided on a case-by-case basis as needed and would entail aspects such as access to counselling services.

## 11. Malicious reporting

I-NAIRA.COM Auction Personnel are encouraged to make reports in good faith. Reports made in good faith, even though unsubstantiated or unproven following an investigation will not be considered malicious and I-NAIRA.COM Auction Personnel will not be penalized for having made them.

However, I-NAIRA.COM Staff Members who deliberately make malicious reports to the detriment of another will be subject to disciplinary measures.

## 12. Safer recruitment

I-NAIRA.COM Auction will ensure safe recruitment and vetting processes are followed for all employees, consultants and partners as recorded in the I-NAIRA.COM Auction's Recruitment and Talent Attraction policy and procedures. This includes but is not limited to background checks and reference checks from previous employers.

Where I-NAIRA.COM Auction Personnel are engaged to work directly with vulnerable individuals, a criminal background check will be undertaken as part of the recruitment process. Candidates will also be asked specific safeguarding questions during the interview.

All I-NAIRA.COM Auction Personnel must comply with this Safeguarding Policy and the I-NAIRA.COM Auction Code of Conduct. The Code sets out the standards of practice we expect in terms of professional competence, integrity, acting as a representative and in safeguarding - which supports our vision, mission and values.



### 13. Induction and training

All I-NAIRA.COM Auction Staff Members will receive an induction into safeguarding no later than three months after joining I-NAIRA.COM Auction. Staff will also be expected to take mandatory safeguarding training and refresher courses annually. Partners and consultants will be expected to demonstrate that their staff undertake safeguarding training on a regular basis (at least annually).

The Safeguarding Administrator will provide input into the development of I-NAIRA.COM Auction's approach to training and will provide assurance to the Board of I-NAIRA.COM Auction that what is being done by way of safeguarding training is adequate.

### 14. Media and the use of images

All photos taken should respect human dignity and consider the rights, safety and well-being of the person or people being portrayed. In relation to safeguarding, I-NAIRA.COM Auction Personnel must not:

- a) Reproduce images and use names of young people and vulnerable adults unless they have clear written permission of their parents or guardians whichever is suitable.
- b) Take pictures that expose children and vulnerable adults to further vulnerability e.g. degrading pictures or pictures that show naked children or partly clothed children.
- c) Not using technology to access, produce or distribute any information or violent sexual images that are harmful to vulnerable people.

### 15. Responsibilities

#### 15.1 Everyone

All I-NAIRA.COM Auction Personnel have responsibility:

- a) To promote a zero-tolerance approach to discrimination, sexual harassment, exploitation and abuse in all forms and place the safety and welfare of children and vulnerable people above all other considerations.
- b) To report any safeguarding concerns, they may have that relates to I-NAIRA.COM Auction Personnel.
- c) To ensure that they do not take any actions that could compromise I-NAIRA.COM Auction's values nor engage in relationships with I-NAIRA.COM Auction Personnel, prospective or actual beneficiaries or grantees that could be deemed exploitative.

In addition, I-NAIRA.COM Auction Personnel must not practice the following prohibited behavior:



- a) Sexually, emotionally or physically harass, exploit, or abuse another person.
- b) Engage in sexual activity or relationships with anyone under the age of 18 or put a child, young person or vulnerable adult at risk of harm.
- c) Exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behavior.
- d) Use their position of power to take advantage of a fellow staff member, grantee (or prospective grantee), partner (or prospective partner), beneficiary or volunteer for sexual purposes.
- e) Develop, encourage or fail to act of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive.

## **15.2 Staff**

All I-NAIRA.COM Auction Staff Members have a responsibility:

- a) To read, understand and adhere to this Safeguarding Policy and the I-NAIRA.COM Auction Code of Conduct.
- b) To attend a safeguarding induction and/or training as availed by I-NAIRA.COM Auction.

To begin working at I-NAIRA.COM Auction and to continue working at I-NAIRA.COM Auction, every staff member must read and acknowledge annually that he or she will comply with I-NAIRA.COM Auction's Safeguarding Policy. This annual acknowledgment ensures that all employees carry out their work in compliance with our shared values. Staff members have two ways (online or paper form) to sign a Safeguarding Policy Acknowledgment Form. This can be done either online or in hard copy.

Your manager will be able to show you where to find the Safeguarding Policy Acknowledgment Form.

## **15.3 Managers**

Managers at all levels within I-NAIRA.COM Auction are responsible for:

- a) Ensuring employees, volunteers, consultants, visitors and partner organizations are inducted into this policy and are supported to implement and work in accordance with it.
- b) Ensuring partners (and prospective partners) are aware of the channels available to them for raising concerns and are encouraged to use them.
- c) Ensuring that a safeguarding risk assessment has been undertaken as part of programme delivery.
- d) Creating a management culture that encourages a focus on safeguarding.
- e) Ensuring that they are responsive, acting immediately if they become aware of any safeguarding concerns and supportive towards I-



NAIRA.COM Auction Personnel who raise concerns about a safeguarding matter.

#### **15.4 Chief Executive Officer**

The I-NAIRA.COM Auction Chief Executive Officer is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone associated with I-NAIRA.COM Auction is equipped and supported to meet their responsibilities.

#### **15.5 Board members**

The I-NAIRA.COM Auction Board holds ultimate accountability for this policy. The Board of Directors plays an important role in safeguarding, not least in terms of setting the right tone for the organization and creating a culture and environment where people feel comfortable about raising safeguarding concerns.

I-NAIRA.COM Auction Directors will also:

- a) Ensure that there are adequate systems in place to manage safeguarding risks. This includes policies and procedures, prevention, reporting and responding mechanisms.
- b) Ensure that there is a Board-level representative of safeguarding concerns.
- c) Ensure that I-NAIRA.COM Auction emphasizes victim support.
- d) Ensure that I-NAIRA.COM Auction achieves transparency and accountability concerning safeguarding while taking account of the sensitivities of the subject matter and the rights and welfare of those affected.

#### **15.6 Designated Safeguarding Officers**

The Designated Safeguarding Officers will:

- a) Record all incidents relating to safeguarding concerns and will report them to the I-NAIRA.COM Auction Board on an annual basis (in an anonymised form). This report will be confidential and if any concerns or patterns of abuse emerge these will be dealt with appropriately.
- b) Conduct or facilitate safeguarding training and induction for I-NAIRA.COM Auction Personnel.
- c) Provide support, advice and assistance to any member of I-NAIRA.COM Auction Personnel who feels they may have been the victim of conduct of a sexual nature that has made that person feel offended, humiliated and/or intimidated.
- d) Where appropriate, support internal reviews and investigations into safeguarding concerns.

### **16. Safeguarding and associated persons e.g. partners**

Associated persons including all partners, consultants and contractors of I-



NAIRA.COM Auction are expected to abide by this policy. They have a duty to:

- a) Prevent sexual exploitation, abuse, harassment or bullying, by or of their personnel, I-NAIRA.COM Auction staff members or consultants, or beneficiaries whom the funds are intended to benefit.
- b) Ensure that their personnel and contractors related to them understand and abide by the contents of this policy.
- c) Notify I-NAIRA.COM Auction immediately of any actual incident of sexual harassment or bullying, or any allegation thereof, and advise I-NAIRA.COM Auction of how it intends to deal with the matter.
- d) To act without delay to bring serious allegations of sexual harassment to the attention of relevant national authorities and to cooperate promptly and fully with any enquiry that national authorities may pursue.
- e) Disclose to I-NAIRA.COM Auction whether personnel are or has been the subject of disciplinary proceedings in relation to sexual harassment or bullying or an allegation of the same, nor questioned by national authorities nor convicted in relation to sexual crimes

A report made by an associated person or partner to I-NAIRA.COM Auction may not necessarily result in the ending of the relationship with I-NAIRA.COM Auction. However, breach of the policy and deliberate non-disclosure of safeguarding concerns will present grounds for the immediate suspension or termination of the contract, at I-NAIRA.COM Auction's sole discretion.

## 17. Independent assurance

All operations of I-NAIRA.COM Auction are subjected to an independent external audit. I-NAIRA.COM Auction commits to having an annual independent assurance of its safeguarding practice.

## 18. External reporting and legal compliance

I-NAIRA.COM Auction is subject to laws and regulations of the countries it operates in and is committed to fully comply with them.

It is recognised that this policy identifies minimum standards that may exceed the requirements of local legislation, and these standards must be upheld where they do not cause conflict with local law.

External reporting to regulators or other bodies will be made in line with laws and regulations and any agreements signed by I-NAIRA.COM Auction.

The Safeguarding Director must ensure reports to external stakeholders are made in line with the relevant laws, regulations and agreements signed by I-NAIRA.COM Auction.

The Director HR and Talent Management will retain a record of all incidents reported and managed and use that information for decision making as



appropriate.

## 19. Data protection

I-NAIRA.COM Auction respects confidentiality and has a responsibility to protect sensitive personal data. Information will only be shared on a need to know basis, that means, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information can receive it. Express written consent will be obtained from an individual or in case of a child, parent/guardian as required. See Data Protection Policy.

## 20. Related policies

This policy should be read in conjunction with:

- a) Data protection policy (Section 3 and 4)
- b) Code of Conduct (section 4.1.5)
- c) Recruitment and talent attraction policy and procedures (Section 5.8)
- d) IT policy and procedures (Section 5 and 6)
- e) Anti-corruption and integrity policy and procedures (section 2)
- f) Whistleblowing policy
- g) Disciplinary policy and procedures
- h) Terms of reference for Designated Safeguarding Officers

## 21. Review of this policy

The Director HR and Talent Management is responsible for overseeing and updating this policy and associated procedure taking into consideration any legal obligations and other external requirements. In the event of no external changes, this policy will be reviewed initially after one year of operation and thereafter every two years.

## Addendum 1: Key definitions

The following are key definitions relevant to this policy.

**Abuse is a violation of an individual's human and civil rights by any other person or persons. It can take** the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult. Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

**Abuse of power** covers a wide range of behavior related to the dynamics of power (in the workplace, community or home). It refers to using a position of



power to take unfair advantage of a fellow staff member, community member, partner or volunteer. An example includes a male senior member of staff using his position to get sexual favours.

**Sexual abuse** is a broad term which includes several acts such as forcing, enticing or coercing someone to take part in sexual activities, whether the person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

It also includes indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

They may also involve a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

All sexual activity with children (as defined under the UN Convention on the Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of maturity or consent locally. Mistaken understanding of the age of a child is not defense.

**Sexual exploitation** constitutes any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another. It is a broad term, but it includes transactional sex, solicitation of transactional sex and exploitative relationships.

**Sexual harassment** is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, when creating an intimidating, hostile, degrading, humiliating or offensive environment.

It involves any unwelcome sexual advance; request for sexual favours; verbal or physical conduct or gestures of a sexual nature; or any other behavior of a sexual nature that might reasonably be expected, or be perceived, to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff, personnel, etc.

**Modern slavery** is the severe exploitation of other people for personal or commercial gain. This can include debt bondage, where a person is forced to work for free to pay off a debt, child slavery, forced marriage, domestic



servitude and forced labor, where victims are made to work through violence and intimidation.

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

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**Psychological abuse** - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

**Discriminatory abuse** – abuse motivated by a person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

**Neglect** is the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development.

**Physical abuse** includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

**Child** – (anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country). It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

**Vulnerable adult** - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

**Youth or young people** - individuals aged 15 to 25 (15 to 35 in some countries) –recognizes that this group spans the categories of 'children and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

## Addendum 2: Designated Safeguarding Officers

I-NAIRA.COM Auction has designated **Nwaukor Hillary** as the **Safeguarding Director** who is responsible and accountable for issues reported across I-NAIRA.COM Auction's operations.

I-NAIRA.COM Auction also has a designated **Safeguarding Officer Victor Eneberi – Field Supervisor** to whom any safeguarding issues can be escalated.



The Designated Safeguarding Officers will fulfil tasks as outlined in section 6 and section 15.6 of the policy.