Global Physical Security Policy

Sightsavers

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2.1.	04/05/2014	References to SMT removed, replaced with 'Management Team'	Resilience & Governance Board

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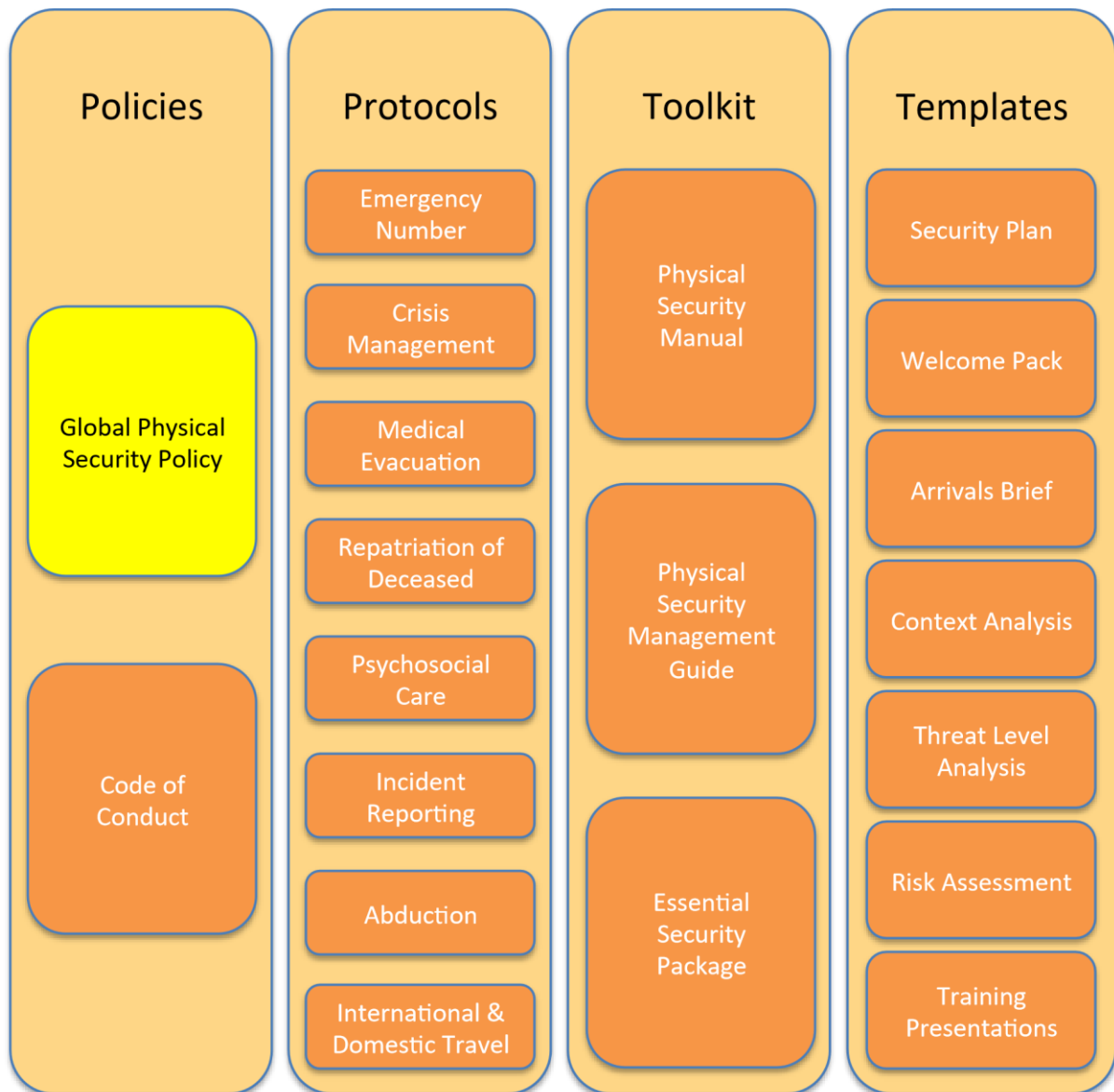| 3.0 | July 2015 | Inclusion of "primacy of human life", "Duty of care", "do no harm", "inclusion", "accountability", "transparency" principles.

Inclusion of references to Corporate Manslaughter & Corporate Homicide Act, Offences Against the Person Act and Health and Safety at Work Act.

Inclusion of "Conveyance of Risk" Strategy

Inclusion of policy commitments, "MOSS", "Right to withdraw" and provision of post-trauma care

Inclusion of crisis management strategy and commitment | |
3.1.	July 2017	Rewording of sections 1.1., 3.4, 4.7	
4.0	March 2019	Changing of document ownership Amendments to roles and responsibilities and decision-making authority	
5.0	September 2020	Reformatting to new policy template	Controller Crisis & Risk
6.0	April 2021	Minor redrafting and amendments by LS and DS	Management

Contents

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Global Physical Security Framework

This document is part of the Global Physical Security Framework that consists of policies, protocols, plans, guidance notes and advisory documents. A summary is provided below.

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Policies	Protocols	Toolkit	Templates
Global Physical Security Policy	Emergency Number	Physical Security Manual	Security Plan
	Crisis Management		Welcome Pack
	Medical Evacuation		Arrivals Brief
	Repatriation of Deceased	Physical Security Management Guide	Context Analysis
Code of Conduct	Psychosocial Care		Threat Level Analysis
	Incident Reporting		Risk Assessment
	Abduction	Essential Security Package	Training Presentations
	International & Domestic Travel		

1. Introduction

1.1. Introduction

The nature of Sightsavers' work necessitates working in volatile and sometimes violent environments. At times this presents a threat to the security and wellbeing of our staff; an issue the organisation takes very seriously.

This document conveys the principles by which Sightsavers operates in all matters relating to the security of its staff, programmes, beneficiaries, and other assets.

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Sightsavers defines security as: "Freedom from risk or harm as a result of intentional or deliberate acts" and is the focus of this policy.

Safety is defined as: "Freedom from risk or harm as a result of unintentional acts (accidents)". Sightsavers manages staff safety under the UK "Health & Safety at Work Act, 1974" and is managed through the Global Physical Security Framework in addition to the Global Health and Safety policy.

Any queries relating to this policy are to be directed to the Resilience team.

1.2. Aims

The aims of this policy are:

- To ensure that Sightsavers is appropriately protected against security threats and can minimize the impact of any security incident

- To promote and encourage an awareness of security risks and controls amongst all staff and other representatives

- To integrate security with 'business as usual' activities in Sightsavers

- To ensure all staff are aware of the legal and moral responsibilities for maintaining the security of Sightsavers staff and other assets

- To demonstrate a clear commitment to the duty of care held for all staff

- To provide a set of Minimum Operating Security Standards (MOSS) against which Sightsavers can assess compliance.

1.3. Scope

1.1.1. Staff

This policy applies to all individuals employed by, or acting as a representative of Sightsavers, including all full-time, part-time and fixed term employees, trustees, supporters, interns, volunteers and consultants or contractors – collectively referred to as 'staff' in the remainder of this policy.

1.1.2. Partners

Sightsavers works in partnership with a number of other institutions. At times, Sightsavers may have varying degrees of duty of care associated with these institutions; such responsibilities must be reviewed and updated whenever a partnership agreement is created or modified. Where Sightsavers is assessed as having full duty of care responsibilities for a partnership, this policy will apply in full.

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In the event that a staff member is subcontracted or hosted by another organisation, for any term, Sightsavers' duty of care for that staff member does not cease.

These policy statements remain valid until the host organisation can provide sufficient evidence of a credible security framework, of a suitable standard, that can supersede this policy. This remains at the discretion of the relevant Programme Manager, in conjunction with the Resilience team, and will be considered on a case-by-case basis. This must be clearly stated as part of any subcontract or Memorandum of Understanding (MoU) at the outset of the relationship.

1.4. Interpretation amendment and review

This policy document will be reviewed by the Resilience Team, in conjunction with the Senior Management Team (SMT), and approved by the COO, every three years (or at the beginning of any major shifts in organisational strategy, whichever is sooner).

Any staff found to have knowingly acted contrary to the guidelines laid out within this document or any locally applicable security plans, or to have willingly endangered themselves, or their colleagues, may face disciplinary as per the Global Disciplinary Policy.

2. Principles

2.1. Primacy of Human Life

Although Sightsavers staff are required to exercise due care and attention to protect the organisation and its assets, they must not place their wellbeing at risk in doing so. Sightsavers subscribes to the Principles of the 'People in Aid Code of Good Practice' and will always place the security of its staff before that of its programmes and property.

2.2. Duty of Care

Sightsavers is legally compelled to comply with "The Corporate Manslaughter and Corporate Homicide Act, 2007" to ensure acceptable standards of security for its staff. This places a legal duty of care upon Sightsavers; failure to discharge this duty of care may expose the organisation to additional legal action under the "Offences against the Person Act, 1861" and "Health and Safety at Work Act, 1974".

2.3. Do No Harm

Programme activities that cause direct or indirect harm to beneficiaries or others also represent a risk to staff, programmes, and assets. Programme planning and security risk management should be an integrated process that considers the possible impact of programme implementation and/or closure. "Do No Harm" should always act as a

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guide to programme decisions, including when faced with a humanitarian imperative decision.

2.4. Acceptable Risk

Sightsavers will not consciously place staff, partners, or beneficiaries, at unacceptable risk in order to achieve programme objectives. Sightsavers programme managers will consider the benefits of programming compared with the risks to staff as part of ongoing security management processes. While life-saving programme activities may demand higher levels of risk tolerance, Sightsavers will not commence or continue activities in areas where the risks outweigh the potential programme benefits.

2.5. Resilience

Resilience is the ability of an organisation or programme to rapidly adapt and respond to significant incidents or situations that would normally disrupt key functions. Sightsavers programmes will develop resilience through the structured, systematic application of Security Risk Management policies and procedures, as well as the development of staff, infrastructure and equipment. A resilient programme should be able to continue critical activities despite an unexpected deterioration in the operating environment. This is not to be confused with Resilience Team.

2.6. Equal Rights

The security of all staff is equally important; no one group or individual is valued higher than another. Sightsavers recognises however that staff members may different face risks because of nationality, ethnicity, gender, sexuality, gender identity, religion, or other factors. Sightsavers may therefore apply different rules, restrictions, or guidelines to staff. Procedures will be based on the assessment of specific contextual risks.

2.7. Independence of Operations

Sightsavers' work is based on independence and neutrality. Sightsavers works closely with government partners in many countries of operation however will not compromise it's independence and neutrality while doing so. Sightsavers reserves the right to advocate on behalf of its beneficiaries and expose and condemn human rights abuses, repression and war crimes, it will never do so at the expense of its staff or beneficiaries.

2.8. Transparency

Sightsavers is committed to establishing and maintaining an open management culture: Sightsavers is honest and open to staff, beneficiaries, and stakeholders about what it does and the decisions it makes. Staff have a right to ask why security management decisions have been made in a certain way; managers have a responsibility to explain and justify these decisions.

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2.9. Accountability

Accountability for security management decisions and policies is explicitly stated (see Annex A) and staff will be held accountable for their actions at all levels. Sightsavers will ensure that audits and other quality assurance mechanisms are used to measure the accountability of management to implement the Global Physical Security Policy.

2.10. Inclusion

Security risk management is an inclusive process that requires input from staff at all levels. Staff should therefore be involved in the formulation, review, and implementation of security policies and plans. Wide participation from staff at all levels will ensure that any approach is relevant, appropriate, and applicable to the organisation.

3. Risk Management Strategies

3.1. Security Risk Management System

All programmes will develop and implement a Security Risk Management System (SRMS), which includes the systematic assessment of risk. It is a systematic, methodical approach to risk, designed to reinforce programme continuity and occupational security of staff and assets. It enables the design of contextualised risk management strategies, and facilitates a structured, objective risk-benefit analysis.

Sightsavers considers a policy of "Acceptance" to be key to safeguarding the organisation and its staff. However, Sightsavers must combine acceptance with deterrence andprotection measures (see section 3.3). The level of each will be determined on the programme and overall operating environment.

3.2. Accepting Risk

In all contexts, some residual risk will remain even after risk assessment and the application of appropriate security risk mitigations. It will be for senior managers at the programme level to decide to accept the remaining risk, and this should be based on the criticality or priority of the programming, weighed against the potential risks to staff, assets, other programmes and Sightsavers reputation.

3.3. Controlling Risk

SRMS provides for the tailoring of various mitigation strategies aimed at controlling or reducing risk. These involve one or more of the following mitigation strategies:

An **acceptance** strategy entails gaining the social and political consent of the host population for Sightsavers presence and work in a given area. Such a strategy goes

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hand in hand with good programming practice. Acceptance should not be assumed but must be actively sought.

A **deterrence** strategy aims to deter a threat with a counter-threat. For example, exterior lighting at premises and installation of CCTV cameras is a deterrent to discourage potential intruders. While deterrence strategies may be required in contexts with Medium or higher security levels, they can profoundly affect Sightsavers' image.

A **protection** strategy employs protective devices such as guards, concrete barriers, barbed wire, or protective procedures such as curfews and 'No-Go areas'.

3.4. Sharing risk

In certain contexts, the risk to Sightsavers itself, or to specific staff – based on nationality, religion, ethnicity, gender, etc. – may be considered too high to continue without alternating programme delivery options. Where Sightsavers is at higher risk than a partner organisation, Sightsavers may 'share the risk' with a partner considered at less risk. Similarly, Sightsavers may deploy only certain types of staff based on their lower vulnerability to specific threats (see section 2.6. 'Equal Rights').

In such cases, Sightsavers has a moral and ethical responsibility to ensure that the risks to a partner organisation or specific staff members fall within acceptable limits. In order to help mitigate the risks faced by partners, Sightsavers may:

- Conduct a joint Security Risk Assessment (SRA) of programming activities and agree with the partner on an action plan to mitigate the risk to levels deemed acceptable by programme managers This would also allow the partner to give informed consent to the proposed activities.

- Take steps to ensurethat the partner provides appropriate duty of care to its staff.

- Where appropriate, provide capacity building to the partner in the form of analysis, training and resources such as vehicles, communications and equipment.

If Sightsavers decides to transfer the risk onto specific staff members (e.g. national or locally recruited staff), it has a similar moral and ethical responsibility to ensure that the risks fall within acceptable limits. In such cases, this decision must be preceded by an SRA and approved by senior management.

3.5. Avoiding Risk

In some cases, Sightsavers may decide that the risk is too high, or the available mitigation measures are insufficient, to justify continued programme activities. If this is

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the case, Sightsavers can avoid the risk by suspending, closing or relocating programme operations to an area where the risks are more manageable.

- **Suspension** refers to the temporary cessation of programme activities.

- **Closure** refers to the permanent or long-term cessation of programme activities.

- **Relocation**, in terms of risk avoidance, means moving programme activities to an alternative location where the risks are more acceptable and manageable.

4. Global Policy Commitments

4.1. Systematic Assessment of Risk

All operational programmes will conduct a SRA in order to develop and implement contextualised security management procedures (contained within a security plan).

4.2. Assigning Security Levels

Sightsavers will categorise the overall risk level in a country or sub-national region using three levels:

| Low |
| Medium |
| High |

Programmes will assign security levels to all areas where Sightsavers is operational using the tools available in the toolkit. These security levels are to be approved by the Resilience Team.

Staff assigned or travelling to a particular country will be informed of the security level prior to the assignment, or when levels change.

4.3. Minimum Operating Security Standards (MOSS)

All Sightsavers programmes and staff are required to adhere to the MOSS (see Annex B). At the programme level, MOSS may be contextualised to the operating environment, based on the outcome of an SRA.

The Country Director is responsible for ensuring MOSS implementation and compliance in their respective office(s). The Resilience Team must formally approve any changes to the MOSS.

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4.4. Clear Delegation of Responsibility

All Country Offices will clearly define individual and management responsibilities for security risk management, including the formal identification of a Security Focal Point (SFP). For multi-country programmes, the Programme Director or manager will have security responsibilities and may nominate a specific Programme SFP.

4.5. The Right to Withdraw

All Sightsavers staff have the right to withdraw from a situation that they feel poses an unreasonable level of risk, without suffering disciplinary action. No manager or staff member may force, intimidate or otherwise coerce another staff member into doing something s/he feels represents an unreasonable risk.

In reference to the policy statement ´Sightsavers will not consciously place staff at risk in order to achieve programme objectives´; staff are consequently obliged to report to the next appropriate level of management any instructions they consider threatening to themselves or those around them.

Should a staff member feel uncomfortable with the level of danger and stress imposed on them by their work, then a review should be undertaken between the staff member and his/her line manager in order to determine an appropriate course of action.

The Country Director is responsible to ensure that all staff in their respective country are aware of their right to withdraw.

4.6. No Right to Remain

All staff must comply with a management decision to evacuate/relocate from a country/area. Failure to follow instructions in this regard will result in disciplinary action, up to and including dismissal. Local national staff working in their home area are exempt from this requirement.

4.7. Crisis Management

In the event that an incident or situation threatens the lives of staff, or has the potential to significantly disrupt programme activities, Sightsavers will ensure that Crisis and/or Incident Management Teams (CMT / IMT) are established at relevant levels to coordinate an appropriate management response.

The overall aim of Crisis Management is to:

- Prevent harm to staff and ensure the well-being of staff affected by the incident

- Safeguard the image and reputation of the organisation

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- Ensure programme continuity and minimise asset loss/damage

A separate crisis management protocol has been developed outlining the individual roles and responsibilities and process for activating the CMT / IMT.

4.8. Medical Evacuation and Emergency Response Plan

All Sightsavers Country Security Plans will include a medical evacuation contingency plan, as well as a medical emergency response plan (to cover situations where medical evacuation is not required e.g. national staff).

For programmes in areas where Sightsavers does not have a country office, this should be provided by the partner (if supporting Sightsavers staff) or developed by the programme team, in conjunction with the Resilience Team.

4.9. Hibernation, Relocation, and Evacuation

4.9.1. Planning

All Sightsavers programmes will refer to the country security plan (where in place) for hibernation, relocation and evacuation (HRE) plans unless it is assessed that the programme requires a specific plan. Hibernation plans are to be prepared as a minimum in all countries rated 'High' or above.

- **Hibernation:** Staff remaining in their accommodation or, in the event of sudden, short-term events, in the Sightsavers office, until a security situation has calmed.

- **Relocation:** The movement of staff* from an area affected by instability or insecurity to a less affected area within the same country.

- **Evacuation:** The movement of international staff* out of the country as a result of medical, security or political situations.

*Sightsavers is responsible for evacuating or relocating international staff and relocating non-local national staff to their place of hire or registered address (or an alternate destination if remote management is an option), should the situation at their work assignment become untenable.

Sightsavers has no legal responsibility to evacuate local staff and will not normally do so; however, it will make every reasonable effort to aid staff within logistical, financial, and legal limitations. If Sightsavers deems that a local staff member has been placed in danger as a direct result of his/her work with Sightsavers, then the organisation will endeavour to organise his/her relocation.

4.9.2. Evacuation / Relocation Decision-Making Authority

The instruction to withdraw from an area can be given by the most senior manager present and is immediate and binding upon all staff. The local manager should make every attempt to consult with the Country Director prior to giving the instruction, but is not required to wait for approval if contact is not possible The Country Director has the authority to direct relocation from all areas within his/her programme area. This is immediate and binding on all Sightsavers staff in the country.

The Country Director can countermand an individual's decision to remain in an area ('no right to remain), but not an individual's decision to leave an area ('right to withdraw').

The decision-making responsibility for the evacuation of a country and the closure of programmes lies with the Country Direction in consultation with the Regional Director and Resilience Team. If the Country Director is unable to contact the Regional Director, s/he can still continue with the evacuation of a country. S/he must make every effort make contact as soon as possible.

The Chief Operating Officer and Regional Director, supported by the Resilience team, have the authority to direct a resumption of programming in an evacuated country. Before taking such a decision, an updated SRA must be completed.

The Chief Operating Officer and Regional Director, supported by the Resilience team, have the authority to direct a resumption of programming following relocation in a particular country.

4.10. Abduction

All programmes, where the SRA identifies a credible risk of abduction, must address this with security controls. The Country Security Plan should identify the risk of abduction. This must be reviewed by the Resilience Team to ensure compatibility with the HQ level abduction protocol.

In the event that one or more Sightsavers staff members are abducted, the Country Director or delegated Security Focal Point must immediately contact the Resilience team (via the Global Security Emergency Phone if outside normal working hours) so that the Crisis Management Team can be activated, and actions can be coordinated at Country and HQ levels.

The Global CMT will assume ultimate decision making authority and will manage all media relations from HQ.
Sightsavers will not pay ransoms or make other concessions for the release of hostages.

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4.11. Incident reporting

All security incidents must be reported immeditatly to the Country Direction and Security Focal Point in each area of operations. Sightsavers defines an incident as follows:

MINOR Incident – An event likely to have consequences for staff and/or operations. Examples include general ill health, staff abandon project without authorisation, staff detained by authorities, and minor car accident.

MAJOR Incident – "An event likely to have significant consequences for staff and/or operations AND is beyond the capacity of regular management systems. Examples include fatal car accident, abduction, violent incident/assault, and office fire."

MAJOR Incidents are required to reported immediately to HQ and the global resilience team.

All incidents must be reported to country directors, security focal points and the Resilience Team. The following are some examples of what constitutes an incident:

- Staff have suffered mental or physical injury.
- Staff were forced to withdraw, even temporarily from an area
- Loss/damage/theft of Sightsavers assets, equipment or material
- Any incident that may have an adverse impact on Sightsavers operations or image.
- Any incident in which Sightsavers or another INGO has been directly targeted with violence.
- Abduction of staff.

In addition to the security incidents reported, Sightsavers staff are also responsible for reporting:

- **Near-misses:** Where an incident (as above) almost happened or was narrowly avoided however could have occurred with the existing controls in place.
- **Bad practice:** Where security procedures and protocol are in place however are not being followed by Sightsavers staff, partners or contractors.

Incidents should be reported using the incident reporting section on Service Desk.

4.12. Individual Responsibility

Sightsavers staff members must recognise that their actions and behaviour may have a direct effect on the security of their colleagues. While Sightsavers will take every

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reasonable step to protect staff from harm, staff members need to make a responsible and proactive contribution to the organisation's collective security. Staff members must:

- Ensure they maintain a positive image by adhering to the Sightsavers Code of Conduct.
- Follow security rules, policies, and procedures. Failure to do so is a disciplinary offence.
- Ensure that they are fully informed of the risks to themselves, their colleagues, and their own organisation.
- Report any security incidents, 'near misses', bad practice and other relevant information.
- Recognise that as long as they are in-country, international staff are subject to security policies and procedures both on and off duty.

4.13. Informed consent

As part of Sightsavers' duty of care, staff must be fully briefed on the situation, context, and risks that they may face in their work, prior to accepting a position with Sightsavers and subsequent to commencing their work.

This is a non-negotiable requirement for any locations. The staff member's line manager in each location is responsible for ensuring this occurs.

Once staff arrive at a Country Office, they must receive a context specific briefing as soon as possible after their arrival, but in all cases within 24 hours, provided or arranged by the SFP. This is the responsibility of the Country Director to ensure.

4.14. Training and Equipping Staff

Sightsavers has an obligation to provide appropriate training and equipment to ensure staff can safely carry out their work.

Staff must receive security training appropriate for high-risk travel prior to travel or work within any country or region rated 'High' or above. This training must be repeated at least every 3 years.

All staff with security management responsibilities must receive appropriate training in order that these roles may be fulfilled correctly.

All staff with driving responsibilities must undergo periodic driver training.

4.15. Stress

Sightsavers' work can involve dealing with extremely stressful situations, witnessing traumatic events, and living with threats to personal security. As part of its duty of

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care, Sightsavers must cater for the mental health of its staff. This includes monitoring staff stress levels, ensuring appropriate time off to recuperate, and providing psychosocial support if required.

Further information on support to staff and relevant points of contact can be found on the Sightsavers Wellbeing Hub.

4.16. Project Proposals and Budgeting

All Sightsavers programmes must ensure that there is sufficient funding for (at least) the minimum standards of security detailed for their security environment. The budgetary implications of satisfactory security are to be considered from the inception of a programme and throughout its lifecycle. Security must be written in to any programme proposal Security requirements must comprise a minimum of 2.5% of the total programme budget. For HIGH risk regions or countries, this budget allocation is likely to be higher. This will need to be identified in consultation with the resilience team during the programme design phase.

Where sufficient funds are not available to ensure the minimum standards of security, Sightsavers will not commence or continue programme activity.

4.17. Insurance

As part of its duty of care, Sightsavers will ensure that all staff have appropriate personal accident and business travel insurance. This insurance is to include cover for war and civil unrest in locations where such risks exist. All consultants, volunteers, and interns performing work-related activities on behalf of Sightsavers must be covered by similar insurance, although Sightsavers may choose to stipulate who has responsibility for purchase of coverage.

Where an international position is formally designated as an accompanied post, spouses and children must be provided with insurance coverage.

4.18. Inter-Agency Cooperation

Sightsavers recognises and supports a collective security approach within the NGO community. Within the bounds of confidentiality and staff security, Sightsavers will cooperate closely with other organisations in order to best manage security. At the discretion of each Country Office, this may include information sharing, joint training, and pooled resources.

4.19. Armed Security

Sightsavers discourages the use of armed protection because it contradicts Sightsavers' approach, is fraught with potentially negative consequences, and may contribute to local war economy. Armed protection should only be considered if all the following conditions are met:

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- The use of armed protection is the only way to mitigate unacceptable risk to staff and every other option has been explored in detail.

- The benefits of employing armed protection outweigh the risks to staff, beneficiaries, community, other NGOs, and Sightsavers' reputation as a responsible organisation.

- Where it is assessed that it is possible to function responsibly with armed protection and would not be possible to function without it.

- There is no indication that the armed security is provided by a group which appears on the lists of proscribed organisations detailed in the Global Antiterrorist Financing Policy.

Where Sightsavers employs armed protection, they will be under strict instruction to use force only in self-defence, or in the defence of those whom it is their duty to protect. Sightsavers Chief Operating Officer, relevant Regional Director and the Resilience teammust approve any intent to engage armed protection prior to taking any such decision.

4.20. Relationship with Security Forces

Under particular circumstances, Sightsavers may consider coordination and cooperation with recognised, legitimate military/police forces. However, the following critical parameters apply:

- Sightsavers' neutrality and independence must be maintained and protected.

- The level of military/police force's competence and training in dealing with civil society must be considered against the possible benefits of coordination.

- The military/police function, mandate, reputation, and popular support must be critically assessed against the possible benefits of coordination.

In the event that armed military or police personnel insist on being present with Sightsavers staff of vehicles, they should travel in separate vehicles.

4.21. Weapons

Sightsavers adopts a 'No Weapons' Policy, prohibiting weapons, of any kind, in offices, guesthouses, residences, vehicles, and storage facilities. In this case, 'weapons' include firearms in addition to batons, pepper spray, knives or machetes.

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The only exception to this is in circumstances whereupon the use of armed protection has been authorised.

Under no circumstances are Sightsavers staff to be in possession of, or to handle, weapons, explosives, or ammunition of any kind.

ANNEXES

- **ANNEX A: Roles and responsibilities**
- **ANNEX B: Physical Security Risk Log**
- **ANNEX C: Staff code of conduct**

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