|  |
| --- |
| Safeguarding Policy Template |

Safeguarding Policy [Organisation]

[Organisation] recognises the importance of safeguarding and is committed to ensuring it manages a wide range of risks such that children and communities, beneficiaries, staff, other associates and the organisation as a whole are kept safe from harm, either direct or indirect, intentional or as a result of unintended consequences. The principle of ‘best interests’ will guide our actions in response to concerns and breaches of this policy.

**Purpose** - The purpose of this policy is to protect people including staff, children, adults at-risk, and people for whom we exist from any harm arising during their contact with [organisation].

The policy sets out the commitments made by [organisation]. It tells staff and other people working on our behalf what their responsibilities are in relation to safeguarding in the workplace and when in contact with people for whom we exist. This policy provides a safe way for staff to report a safeguarding concern, and for those concerns to be dealt with and managed in the safest and most appropriate way.

**Scope** - This policy applies to all staff contracted by [organisation] and anyone working on behalf of [organisation], including but not limited to trustees, volunteers, lived experts, contractors, partners, consultants, and donors. Safeguarding is everyone’s responsibility.

**Policy position** – [Organisation] is committed to safeguarding everyone involved in our organisation and the work we do. We believe this is true whatever people’s age, race, ethnicity, religion, sexual orientation, gender identity, class, ability (or disability), or background.

We will take every reasonable step to provide safe environments for all personnel and those involved in the work we do, whether online, over the telephone, or face to face. This includes ensuring we act to prevent harm and promote safety in the organisation in all aspects of our work. It also includes making sure we take appropriate steps if we have a concern about staff, people for whom we exist, an adult at-risk, or a child, supporting them whenever this happens. Through our safeguarding work, [organisation] wants to work with everyone to create a strong safeguarding culture and a safe environment to work so everyone can thrive[[1]](#endnote-1).

**Leadership Accountability and Culture** - Safeguarding is a top priority for {organisation]. In order to ensure this priority our senior leadership team will:

* Ensure {organisation] has a strong and effective safeguarding culture, safeguarding policy, Code of Conduct, and safeguarding procedures.
* Annually review and update [organisation’s] safeguarding policy and procedures, learning from any serious incident or ‘near miss’, to ensure they are fit for purpose.
* Assess possible risks, including risks to people for whom we exist or to anyone else connected to [organisation], and any emerging risks on the horizon.
* Ensure that everyone involved with [organisation] knows how to recognise, respond to, report and record a safeguarding concern.
* Ensure people know how to raise a safeguarding concern.
* Ensure any safeguarding training provided is regularly evaluated, so that it is current and relevant.

https://www.turn2us.org.uk/T2UWebsite/media/Documents/PDFs/20200602\_Turn2usSafeguardingPolicyAPPROVED.pdf

## Definitions

A Child is defined as any person under the age of 18 years.

Vulnerable people refers to the people living and working in communities in the countries in which we work who may be vulnerable because of poverty, exposure to conflict or emergency, or because of their identity e.g. disability

A beneficiary is a man, woman, girl or boy who is being supported by our organisation and/or receiving aid.

**Direct contact/working with beneficiaries/children** describes being in the physical presence of a beneficiary or child in the context of [Organisation]’s work, whether contact is occasional or regular, short or long term.

**Indirect Contact/impact on beneficiaries/children** describes having access to information on beneficiaries/children in the context of [Organisation]’s work, such as names, locations (addresses of individuals or projects), photographs and case studies. It also describes the impact that our programmes or projects may have on children, even if they are not our direct beneficiaries.

**Harm and Abuse**

Harm and abuse constitutes ‘all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to a child or adult’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

While abuse encompasses a wide range of conduct and situations, the main types of abuse can be categorised and defined as follows:

* **Physical abuse** occurs when a person purposefully injures or threatens to injure a child or adult or when a lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, power, or trust, exposes that child or adult to physical harm. There may be single or repeated incidents. This abuse may include slapping, punching, shaking, kicking, burning, shoving, or grabbing.
* **Emotional Abuse** includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that a child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential and in the context of the society in which the child lives. It also occurs when a child or adult is repeatedly rejected or frightened by threats. This may involve restriction of movement, name calling, being put down or continual coldness from relatives or caregivers; to the extent that it affects the child or adult’s physical and emotional or mental health.
* **Neglect** is the persistent failure or the deliberate denial to provide the child or adult, in the context of resources reasonably available to the family or caretakers, with clean water, food shelter, sanitation or supervision or care to the extent that the child or adult’s health and development are placed at risk. This includes the failure to properly supervise and protect children or adults from harm as much as is feasible[[2]](#footnote-1).
* **Sexual Abuse** occurs when a child or adult is used by older or bigger child, adolescents or adults for their own sexual stimulation or gratification – that he or she does not fully comprehend, is unable to give informed consent to, or for which the child or adult is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society, regardless of the age of majority or age of consent locally. These can be contact or non-contact acts.

**Commercial or other exploitation** of a child refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour and child prostitution. These activities are to the detriment of the child’s physical or mental health, education, or spiritual, moral or social-emotional development.

**Sexual Exploitation and Abuse**

**Sexual Exploitation**[[3]](#footnote-2)

Sexual exploitation means 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. Sexual exploitation includes e.g. purchasing the services of prostitutes and asking for sex in exchange for providing employment

**Sexual Abuse**

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

## Code of conduct

The Code of Conduct commits signatories to abiding by [Organisation] policy and procedures and specifically behavior protocols regarding their interaction with vulnerable people, communities, children and communities, use of children’s images and information and reporting concerns.

Reference to [Organisation] Code of Conduct will be made in all relevant contracts and agreements, such as employment contracts, grant agreements, agreements with contractors involved in working with children and communities, and so on.

Formal agreements will highlight [Organisation] commitment to safeguarding and require compliance with the principles and practices of this policy and the code of conduct, or relevant safeguarding standards. Consequences of breaching the policy and code are explicit and include disciplinary action up to and including dismissal, or termination of contract, along with possible further action as required, e.g. referral to national authorities.

**Confidentiality**

Confidentiality is a fundamental principle of safeguarding and underscores all elements of safeguarding work.

It is essential that confidentiality is maintained at all stages when dealing with safeguarding concerns and complaints. Information relating to individuals, the concern, and subsequent case management will be shared on a “need to know” basis only. This means [organisation] will only inform those who need to be informed.

**Survivor-centred approach**

[Organisation] has a duty of care to respond to every concern and complaint. If anyone has concerns that any individual is or has been at risk of being abused, exploited, harassed, or harmed in any way, they must report this immediately in line with the reporting procedures outlined in this policy.

In this policy ‘survivor’ is the person who has experienced the harm and ‘complainant’ is the person who is raising the concern or complaint. These may or may not be the same person.

**Safeguarding roles and responsibilities - (to be adapted depending on {organisation’s] provision but could include):**

Safeguarding Lead

* Is accountable overall for the implementation of [organisation’s] safeguarding work and communicating with the Board/Senior Management Team on behalf of the organisation on safeguarding.

Safeguarding Officer/Focal Point

* Supports [organisation]to embed a culture of safety and confidence in safeguarding.
* Develops and manages the safeguarding plan in consultation with the wider organisation and supports [organisation] to be compliant with regulatory requirements and safeguarding standards.
* Ensures policies, systems, referral mechanisms, and responsibilities are clear and embedded in [organisation].

Safeguarding Committee/Panel

* Consults and advises on the safeguarding plan, policies, tools, and systems.
* Is accountable for the implementation of the safeguarding plan, policies, tools, and system.
* Promotes a proactive and positive safeguarding culture within[organisation]
* Is responsible for [organisation’s] key decision making in response to safeguarding incidents and concerns.

## Recruitment and selection

In addition to [Organisation]’s standard recruitment processes, the following safeguarding measures will be included:

All staff and volunteers will, prior to taking up their position, be required to:

* Accept and commit to our safeguarding policy and our Code of Conduct.
* Complete a written application form.
* Provide the name and contact information of two character references.
* Provide photographic evidence of their identity.
* Undergo a criminal records check, where possible, in their country of origin.
* Comply as appropriate with any applicable laws and regulations regarding working with children.

No person who is prohibited by their local laws from working with vulnerable people, beneficiaries or children may take up any role working with [Organisation].

Volunteers engaged by [Organisation] will be required to commit to [Organisation]’s safeguarding policy and code of conduct and receive an induction on implementing the policy in the local context in which they are working. [Organisation] International will be responsible for ensuring volunteer recruitment practices are in line with international standards.

## Education and Training

[Organisation] understands that, in order for the safeguarding policy to be well understood and effectively implemented, it is essential that there are high levels of awareness regarding the policy and that staff and others are clear, confident and competent in putting the policy into practice.

[Organisation] will:

* Disseminate and promote the policy widely. Copies of the policy will be made available and accessible to all stakeholders, both in hard copy and electronically.
* The policy will be distributed to partners and any other relevant parties beyond [Organisation] to ensure that the policy commitments, principles and practices are publicised and that everyone is clear about [Organisation] position in relation to safeguarding.
* Briefings and trainings will be incorporated into standard induction processes for all staff, and at the annual staff meetings/workshops. Those staff in direct contact with children and communities must have a full briefing on the policy, and how it applies to them and the work they are undertaking, prior to working directly with children and communities.
* [Organisation] will ensure further training is provided for staff with specific responsibilities for the policy.

## Use of Images and Information

[Organisation] is committed to portraying children and adults in a respectful, appropriate and consensual way and never in a vulnerable or submissive manner. Individuals representing [Organisation] or [Organisation]’s partners must adhere to the following guidelines when capturing, storing, and displaying or publishing children and adult’s images:

* All images that are used must be accompanied by signed, written and informed consent. The child and/or his or her guardian, or adult must be informed of the nature of their agreement prior to signing the consent form.
* Personal information about a child or adult (such as full name and date of birth or full names of family members) and information that could be used to identify his/her specific location within a country (such as village or community names, school, parish, etc.) will not be used, especially where this is linked to an image.
* Local cultural traditions must be respected in all images.
* No images of children or adults shall be used that could be considered sexually suggestive.
* Children or adults that have experienced violence, exploitation, have been otherwise abused or are in some way particularly vulnerable or at risk, will not be identified by either personal details or images which represent them in a way that may lead to their identification.
* No secondary publication of images. Every time [Organisation]’s photographs are used in a presentation the presenter must read out a statement to the audience noting that photographs of [Organisation] images may not be used.
* Images shall portray an honest representation of the context and the facts.
* All images and stories, along with accompanying details of individuals, will be used and kept according to relevant data and privacy laws.
* All photographers will be screened for their suitability, including police checks where appropriate.

## ICT

[Organisation] prohibits any use of its computer systems and networks in violation of any applicable law or [Organisation] policy, including those covering safeguarding, equal opportunities, racial and sexual harassment, discrimination, confidentiality, copyright and proprietary rights, publications, bullying, data protection and privacy; and/or any use that may potentially cause any damage, PR risk, legal or other liabilities to [Organisation] or its people.

Violation of any of the policies by any user may result in disciplinary action including termination of employment or contractual/other relationships or even criminal prosecution.

## Partners

All partner organisations that work with [Organisation] and are working with children and communities, are required to have in place and adhere to minimum standards for safeguarding, which are set out in the procedures linked to this policy.

During grant application and contracting processes, [Organisation] will assess the need for partners to comply with the safeguarding standards, and where activities involve working with or having an impact on children and communities, (i.e. where grantees/contractors are engaged in an activity, on behalf of or funded by [Organisation], that involves direct contact with, or facilitates access to children and communities) they will be required to indicate their current level of compliance with [Organisation]’s minimum safeguarding standards and/or describe plans to ensure any areas of non-compliance will be met before, or within an agreed period after, the commencement of the grant/contract.

Existing grantees and contractors will also be required to develop safeguarding measures in line with the minimum standards, either within the current grant period or on renewal, or at an agreed point as appropriate.

Compliance with the agreed minimum standards will be written into all contractual, partnership agreements and grantee contracts where these involve working with children and communities and will be monitored via existing reporting and monitoring arrangements.

## Associates

[Organisation] provides a range of people with access to our work and to children and communities we work with. This is highly privileged access and should only be granted for legitimate work purposes. [Organisation] associates include donors, consultants and others brought into contact with children and communities by [Organisation].

Preventing harm to vulnerable people, children and communities is our highest priority, and it is possible some associates could inadvertently create situations that may impact negatively on vulnerable people, children, and communities or in worst-case scenario, pose a real risk to those we are supporting. Even where we may know and trust the associates, it is still important that we take great care to ensure communities are not exposed to any inappropriate or harmful conduct on their part, whether intentional or unintentional.

All associates who come into contact with children and communities through our work, *whatever their role or status*, must have clearance, i.e.,

permissions from relevant managers. Most importantly, all associates will be provided with, and briefed on, [Organisation]’s safeguarding policy and Code of Conduct and will at all times be accompanied and supervised by staff when coming into contact with children and communities.

## Reporting safeguarding concerns through the Complaint Procedure

[Organisation] considers the abuse of vulnerable people, children and communities to be completely unacceptable. We will take all concerns and reports of abuse seriously and act on these reports immediately and in compliance with the mandatory reporting laws.

Individuals representing [Organisation] or [Organisation]’s partners are duty-bound to report concerns or allegations. These concerns may relate to a vulnerable person, beneficiary, child or a staff member involved in [Organisation] or [Organisation]’s partner or a concern about a vulnerable person, beneficiary, child or person/s outside of the [Organisation] programmes.

[Organisation] and partners will agree on local reporting mechanisms which are relevant for the project and the context in which it is being delivered. Partners receiving reports of concerns which have arisen because of the project being supported by [Organisation], will report the concerns through the appropriate channels so that [Organisation] can ensure appropriate measures are taken.

Any individual, who has observed or was told about behaviour that could be considered abuse, must immediately report the information as outlined below.

Any individual who has concerns about the appropriateness of actions involving vulnerable people, beneficiaries or children by those representing [Organisation] or [Organisation]’s partners must immediately report their concerns. Concerns include suspected actual or potentially abusive or harmful behaviour towards a child[[4]](#footnote-3), behaviour or situations that might place a child at risk of harm, or suspected or actual sexual exploitation or abuse of vulnerable people.

No adverse action will be taken against individuals who report violations of this policy in good faith, as described in [Organisation]’s Whistleblowing Policy. Any employee who intentionally makes false and malicious allegations will face disciplinary action.

**Investigating cases of alleged abuse**

Upon receipt of an allegation of abuse, [Organisation] and/or partners will activate a prompt, thorough and confidential investigation that treats all parties with respect and fairness, in line with the investigation procedures. [Organisation] will also take preliminary or temporary action to prevent any potential continuation of abuse. Throughout the investigation, every effort will be made to protect the rights and safety of the vulnerable person or child, there will be no contact between the alleged offender and the beneficiary or child, and the vulnerable person/child will be interviewed and assessed by an external investigator with no affiliation to [Organisation] and skilled in communicating with and assessments of abuse.

[Organisation] employees or volunteers found guilty of abuse shall face disciplinary action, up to and including termination of employment/engagement.

In the case of alleged abuse by representatives of [Organisation]’s partner institution, [Organisation] will collaborate with the management of the partner institution to investigate the case. If the partner institution is unwilling to collaborate, [Organisation] may end the relationship with the partner.

## Monitoring and Review

[Organisation] will ensure that implementation of the safeguarding policy is subject to regular monitoring and will review the policy every two years (although changes may be made prior to formal review should legal, policy or practice changes suggest this is necessary).

The international standards for safeguarding, as set out in the procedures associated with this policy, should be used as a guide when monitoring implementation of the safeguarding policy – the aim is to ensure all offices meet these standards.

The Senior Management Team will be responsible for supporting and maintaining an overview of implementation and compliance issues across the organisation.

|  |
| --- |
| **Senior Management Signoff**  **Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**  **Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**  **Organisation \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |

1. https://www.turn2us.org.uk/T2UWebsite/media/Documents/PDFs/20200602\_Turn2usSafeguardingPolicyAPPROVED.pdf [↑](#endnote-ref-1)
2. NB Identifying neglect in resource poor contexts can be especially difficult. Failure to provide adequately for children in situations of extreme poverty does not necessarily constitute neglectful behavior. Rather, it is a case of assessing available resources and the efforts parents and carers are making to meet the needs of their children. [↑](#footnote-ref-1)
3. Definitions of “sexual exploitation” and “sexual abuse” from the United Nations Secretary General’s Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13). [↑](#footnote-ref-2)
4. Principally this relates to children [Organisation] is in direct contact with through its work, but could encompass actual or potential harm to other children that we are in indirect contact with or are made aware of, e.g. in the wider communities in which we work. [↑](#footnote-ref-3)