

## Safeguarding Policy

### Introduction

Excellent Development has an integrated Safeguarding Policy that specifically addresses child protection and anti-sexual exploitation as well as all other forms of abuse. Safeguarding is everyone's responsibility and we must do everything we can to both protect our staff and the people that we were set up to help. We expect all staff, volunteers, trustees and partners to conduct themselves in a way that preserves the dignity and respect of every individual. We will promote good working practices that prevent harm, abuse, and coercion occurring and we will create a climate where people feel safe to report any behaviour that threatens them or makes them feel uncomfortable.

Safeguarding is the responsibility that we (like all organisations) have to ensure that our employees and volunteers, partners, operations and programmes do no harm to children, young people or vulnerable adults; that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns that we have about the safety of vulnerable people within the communities in which they work, are dealt with and reported to the appropriate authorities. It is also the responsibility that we have for protecting our employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

**Child protection** is a central part of but not separate to 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 a programme of work. Keeping the children we work with safe is our top priority. All children have a right to protection from violence, exploitation, abuse and neglect. Excellent Development defines anyone under the age of 18 as a child.

We take child safeguarding extremely seriously and have a zero tolerance approach to abuse and exploitation of children by any of our representatives. All of us at Excellent Development must demonstrate the highest standards of behavior towards children in both our professional and personal lives, and must not abuse the position of trust that comes with being part of our organisation. We must do all we can to prevent, report and respond appropriately to child abuse, and seek advice whenever action is needed. We all have a duty to respond where action is requested or required, whether the child is known or unknown to Excellent Development, or if it relates to incidents of historic abuse. By minimising danger to children we can save more children's lives, fight for their rights, and help them fulfill their potential now and in the long-term.

**Sexual Exploitation** or sexual abuse involves the direct or indirect involvement of an adult or child in sexual activity to which they are unwilling or unable to give informed consent and whether or not they are aware of what is happening. It may involve forcing, enticing or coercing someone to take part in sexual activities. Any sexual activity with a child, or with an adult that is not freely consenting, is criminal. Where there is an abuse of trust adult, sexual activity may appear to be consensual but it is unacceptable because of the differences in power and influence between the people involved. We have a zero tolerance approach to any form of sexual exploitation of adults or children by any of our representatives.

**Prostitution** may not be illegal however if there is any actual, or suspicion of, exploitation, coercion or aid traded for sex this is a different matter. We expect all our staff, volunteers and partners to adhere to our philosophy and values and to not engage in conduct which could damage our reputation. For this reason Excellent Development deems the paying for sexual services whilst working on programmes or representing the organisation abroad, as unacceptable behaviour which will result in dismissal.

**Purpose**

The purpose of this policy is to provide clarity to all staff and representatives on how they should engage with children, young people and vulnerable adults when working for, on behalf of, or in partnership with, Excellent Development. It is also to help us make sure that employees, volunteers and other representatives are protected.

It is intended to help us to have a common understanding of safeguarding issues, develop good practice across the areas in which we operate and thereby increase accountability in this crucial aspect of our work.

Whilst it is recognised that local legislation may vary from country to country, this policy identifies our minimum standards and may exceed the requirements of local legislation.

Where there are visits and events that involve joint planning of activities with Excellent Development or a Member organisation, the Safeguarding Policy and Local Procedures of the organisation receiving the visitors must also be adhered to.

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

**Scope**

This policy applies to:

- All Excellent Development UK staff, including those on contracts such as consultants and researchers ('staff')
- Trustees, volunteers, interns, and trainees ('representatives')
- Staff and representatives of partner agencies, or any other individuals, groups or organisations with a formal/contractual relationship to Excellent Development bringing them into contact with young people ('partners')
- Donors, supporters, journalists, celebrity ambassadors, politicians and others who may come into contact with children through their involvement with Excellent Development

This policy demonstrates how Excellent Development will meet its legal obligations and reassure volunteers, staff, partners and members of the public:

- On what they can expect Excellent Development to do to protect and safeguard vulnerable people
- That they are able to safely voice any concerns through an established procedure
- That all reports of abuse or potential abuse are dealt with in a serious and effective manner
- That there is an efficient recording and monitoring system in place
- That staff and representative, sub contracted agencies and partners receive appropriate induction on safeguarding
- That a robust 'safe' recruitment procedure is in place

Safeguarding needs to be embedded throughout Excellent Development and therefore it forms part of a suite of policies where there are interdependencies, for example:

- Respect at Work
- Discipline and Grievance
- Whistleblowing
- Anti-Bribery
- Recruitment and Selection

All of these policies form part of Excellent Development's contract of employment. The Safeguarding Policy suite will form part of the Contract with our in-country providers

### **Policy Statement**

Excellent Development has zero tolerance of abuse and exploitation of vulnerable people. We believe that safeguarding is everyone's responsibility and that we have an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of our own staff and the vulnerable people with whom we work and those communities that we help and support. Excellent Development works to the following key principles:

- 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 opinion, national, ethnic or social origin, property, disability, birth or other status.
- The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- We will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or vulnerable adult is at risk or is actually harmed.
- We ensure that employees and volunteers are inducted in our Safeguarding Policy and procedures as a key part of the recruitment and induction process
- We will ensure that all our Safeguarding Policy forms part of the Contract with our in-country providers. When working with or through partners or sub contracted agencies, we will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- We recognise that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact.
- We respect confidentiality and have a responsibility to protect sensitive personal data. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- We always seek to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. We endorse the United Nations Convention on the Rights of the Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and article 19 which accords equal rights to protection for children from abuse. Every child matters everywhere in the world. Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

**Responsibilities****All employees, volunteers, representatives and partner organisations are obliged to:**

- Follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures
- Undertake the relevant induction and refresher training on this policy
- Strive to promote a zero tolerance approach to discrimination, sexual harassment and abuse in all working environments
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty
- Place the safety and welfare of children and vulnerable people above all other considerations
- Report any concerns they may have about the welfare of a child or vulnerable person or any suspected sexual exploitation in accordance with Local Procedures
- Respond to any child or vulnerable person who may have been abused or exploited in accordance with Local Procedures
- Report any concerns they may have about the behaviour of an Excellent Development employee or representative in relation to safeguarding
- Identify, minimise and where possible avoid potential situations of risk for children e.g. When privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why. If possible ensure another adult is in sight and that the child or young person knows another adult is around
- Identify and avoid potential situations that may lead to staff behaviour being misinterpreted
- Ensure that when making images of children such as videos or photographs, that they are respectful, the children are adequately clothed and that sexually explicit poses are avoided
- Ensure that any image or recording of a child does not place at risk or render them vulnerable to any form of abuse
- Ensure the safeguarding policy is complied with if any child (beneficiary or otherwise) is to participate in an activity or event such as a campaign event, awards ceremony or social networking event

**All employees, volunteers, representatives and partner organisations are obliged to not:**

- Physically harass, assault or abuse any child or adult
- Sexually harass, assault or abuse another person
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade including language that is abusive or offensive
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe
- Engage in any sexual activity with anyone under the age of 18, regardless of the age of consent locally. Mistaken belief in the age of the child is not a defence
- Develop, encourage or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive
- Act in ways that may be violent, inappropriate or sexually provocative
- Pay for sexual services while representing Excellent Development in a professional capacity including working overseas on programmes and/or staying in accommodation funded by Excellent Development or its partners

- Have a child with whom they are working stay overnight in their home and/or sleep in the same room (unless necessary and previously agreed by managers that this is for the safety of the child)
- Do things for children of an intimate or personal nature that they can do for themselves such as toileting, bathing and dressing.

**Senior Management Team:**

Senior Managers are responsible for creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

**The Executive Officer**

The Executive Officer is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone linked with Excellent Development is equipped and supported to meet their responsibilities. They are responsible for informing the Board of any alleged safeguarding incidents, investigations and actions taken and for disclosing relevant information to the Charity Commission in a transparent and timely manner.

**Designated Safeguarding Officer**

The Designated Safeguarding Officer is a nominated member of the senior management team. They are responsible for handling reports or concerns appropriately and in accordance with the procedures that underpin this policy. They are responsible for:

- monitoring and recording safeguarding concerns
- ensuring referrals to the relevant authorities happen without delay
- updating and implementing safeguarding training for all staff
- ensuring this policy is reviewed every 3 years or earlier if necessary
- ensuring monitoring and recording procedures are implemented

**Trustees**

The Board of Trustees receive regular updates on Safeguarding

The Chair of Trustees is responsible for determining how to address safeguarding concerns raised through the whistleblowing policy

The Chair of the Remuneration Committee is the nominated trustee for Safeguarding

The Board of Trustees holds ultimate accountability for this policy

**Review**

Excellent Development commits to reviewing policies every three years. Given the current situation with regards to Safeguarding in Charities (as of March 2018) and the impending statutory review, this policy will remain under constant review and it and other associated policies will be updated if required.

**Procedures****Conduct, Raising Concerns and Dealing with Allegations**

We have reviewed and amended the following policies and procedures to ensure that there is a consistent message regarding our expectation on conduct and what is not acceptable as well as ensuring staff know how they can raise concerns and how allegations will be dealt with depending on the nature of the alleged safeguarding breach.

**Recruitment and Selection:**

Excellent Development will use best practice recruitment techniques (for more detailed guidance, refer to our Recruitment and Selection procedure). Whilst we currently have no

roles where DBS checks need to be applied, we intend that all our adverts will include the words *“Excellent Development is committed to safeguarding and promoting the welfare of children, young people and vulnerable people; therefore please note that our recruitment procedure includes DBS checks and overseas checks where applicable. Please note that prospective employees will need to evidence that they have the relevant permission to work in the UK.”*

All Excellent Development trustees, employees and volunteers must sign and abide by this safeguarding policy and the respect at work policy as a condition of their contract of employment. Together these policies along with our philosophy and values, set out the standards of practice we expect in terms professional competence, integrity, safeguarding and in acting as a representative of Excellent Development.

### **Induction and Support:**

Advice, support and guidance on safeguarding will be provided to all employees and volunteers on:

- What they should do in the event of a disclosure
- What to do if they have concerns about the welfare of a child
- How to recognise signs of abuse
- What to do if they have concerns about an Excellent Development employee, volunteer or employee of a partner organisation
- Where to go for advice and support within the organisation

When working overseas, we will ensure there are clear processes for reporting and dealing with safeguarding concerns. Partnership agreements must clearly outline the agreed Local Procedures for reporting and investigating concerns regarding breaches of the policy. Employees and volunteers preparing for visits, expeditions or working overseas will be given the name(s) of the in-country designated safeguarding officers as part of their induction briefing and risk assessment.

### **Data Protection**

We respect confidentiality and have a responsibility to protect sensitive personal data. Information should only be shared and handled on a *need to know basis*, that is, 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 are allowed to receive it.

We ensure that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialised child welfare or law enforcement agency in relation to a safeguarding incident. (For more guidance, refer to our data protection procedure).

### **Contracts with In-Country Partners**

This Safeguarding policy will form part of the Contract with in-country partners. We will brief them on our safeguarding policy and ask for information on how their organisation works to ensure that they meet our minimum safeguarding standards. Partnership agreements and project plans must clearly outline the agreed Local Procedures for reporting and investigating concerns regarding breaches of the policy. This will include the names of the in-country designated safeguarding officers, who the relevant local authorities are and how to contact them. Safeguarding information is included in the risk assessment, country briefing and induction that staff and volunteers receive before travelling overseas.

**Raising and responding to concerns**

Excellent Development places a mandatory obligation on all employees, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation of vulnerable people or which suggests this policy may have in any other way been breached.

It is not the responsibility of the employee to decide whether or not abuse has taken place, however concerns should be raised with their line manager and the Designated Safeguarding Officers both in Excellent Development and the In-Country Partner (where appropriate). Concerns may also be raised through the whistleblowing policy.

Excellent Development is not an investigative authority. It is essential that referrals are made to the relevant agencies to ensure that appropriate protection and support is given to the vulnerable individual, and that any evidence is collected in accordance with the law.

If the allegation is against an employee of a partner then it is the responsibility of the In-Country Designated Safeguarding Officer to lead. They will initiate their Local Procedure and make the appropriate referrals. They will liaise closely with their counterpart in Excellent Development who will need to be assured the agreed Local Procedures have been followed satisfactorily and consider if there are any actions required by Excellent Development. If the employee feels threatened or so uncomfortable by what they have witnessed, we have safeguarding duty to them and will discuss and agree appropriate support.

Any allegations made about an employee of Excellent Development will be investigated through both the safeguarding policy (to ensure the appropriate referrals are made) and through disciplinary procedures. The process will be led by the Designated Safeguarding Officer, involving other policy leads if required. Careful consideration must take place about the appropriateness of the person continuing to work with Excellent Development. (For more detailed guidance, refer to the Disciplinary Policy). The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse), and be shared on a strictly '*need to know basis*', that is, access must be necessary for the conduct of one's official duties.

Excellent Development will monitor and record all alleged safeguarding incidents, investigations and actions taken. We will disclose all relevant information to the Charity Commission in a transparent and timely manner.

If there are continued allegations or incidents of abuse made against a partner organisation and they are not dealt with to our satisfaction through the Local Procedures then Excellent Development will consider options for terminating contracts.

## Safeguarding Policy Appendix 1

### Definitions of Abuse

**Abuse** - 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.

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

**Financial or material abuse** - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**Neglect** - 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. This could include withholding the necessities of life such as medication, food or warmth.

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

**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. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

**Sexual abuse** - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the person is aware of what is happening. This includes rape, indecent assault, inappropriate touching, exposure to pornographic material, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

## Safeguarding Policy Appendix 2 – Safeguarding Standard

This standard framework is from the Keeping Children Safe “Child Safeguarding Standards” and adapted for use by Excellent Development. Each standard can be met in whole, in part or not met.

Standard		Potential evidence of standard being met
1. Policy	1.1 The organisation has a clear safeguarding policy that seeks to prevent harm to children, young people and vulnerable adults	<ul style="list-style-type: none"> <li>• A copy of the policy, signed by all employees, volunteers and board of trustees</li> <li>• Requirements are embedded in all interdependent policies</li> </ul>
	1.2 Policies are publicised to staff, beneficiaries and wider communities	<ul style="list-style-type: none"> <li>• Policy and/or minimum standards are part of the Contract with in-company partners</li> <li>• Examples of ways the policy has been promoted, including to children, young people or other community members as necessary</li> </ul>
2. People	2.1 The organisation places clear responsibilities and expectations on its staff and associates and supports them to understand and act in line with these	<ul style="list-style-type: none"> <li>• Job descriptions make clear the responsibilities and expectations on those with contact with vulnerable people</li> </ul>
	2.2 Key staff are designated at different levels with clearly defined roles and responsibilities	<ul style="list-style-type: none"> <li>• Clear responsibilities for a Designated Safeguarding Officer at appropriate level</li> </ul>
	2.3 There are written guidelines for appropriate and inappropriate behaviour	<ul style="list-style-type: none"> <li>• A written code of conduct; evidence of this being shared to employees, trustees and volunteers</li> </ul>
	2.4 There are appropriate learning opportunities to develop and maintain the necessary attitudes, skills and knowledge to keep vulnerable people safe	<ul style="list-style-type: none"> <li>• A copy of training plans, course attendance records and course evaluations.</li> <li>• Evidence of induction for volunteers to relevant safeguarding issues</li> </ul>
3 Procedures	3.1 Organisations carry out local mapping exercises which provide information on the legal, social welfare and child protection arrangements.	<ul style="list-style-type: none"> <li>• Legal requirements are included in policies</li> <li>• Information provided to employees and volunteers deploying overseas as part of induction</li> </ul>
	3.2 Safeguarding risks and mitigation strategies are incorporated into existing risk assessment processes at all levels.	<ul style="list-style-type: none"> <li>• Risk assessments include appropriate and relevant risks</li> <li>• Evidence of mitigation strategies implemented</li> <li>• Risk assessments shared with volunteers</li> </ul>
	3.3 Safeguarding issues are integrated into programme design, delivery and evaluation	<ul style="list-style-type: none"> <li>• Policies form part of the Contract</li> <li>• Evidence of safeguarding issues in project proposals, plans, needs assessments, etc.</li> <li>• A copy of a concern/allegation management report</li> </ul>
4 Accountability	4.1 Implementation of safeguarding policies and procedures is monitored	<ul style="list-style-type: none"> <li>• Copies of Governance sub group meetings</li> <li>• Copies of reporting to boards, donors, etc.</li> <li>• Copies of minutes of meetings to review practice</li> </ul>
	4.2 Learning from issues captured and informed future policy and procedure reviews	<ul style="list-style-type: none"> <li>• Incident reports produced</li> <li>• Copies of management meetings</li> <li>• Copies of information shared with Charity Commission</li> </ul>
	4.3 Policies and procedures reviewed at least every three years	<ul style="list-style-type: none"> <li>• Evidence of review in annual plans / strategies</li> </ul>