

Vision for a Nation – Global Safeguarding Policy

Version	Date	Comments
1.0 Final	18/09/2018	Approved by Board of Trustees
2.0 Final	21/05/2019	Amended to 'Global' policy

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1. Introduction

VFAN is committed to the highest standards of ethical conduct and integrity in its activities. Every employee and associated person acting for, or on behalf of, the organisation is responsible for maintaining the highest standards of professional and moral conduct. This document outlines the organisation's policy on safeguarding children and vulnerable adults.

VFAN seeks to act in a professional, honest, fair and transparent way within all its relationships and activities and in accordance with all relevant legislation, both UK legislation and the legislation of the countries where we have programme activities.

The nature of our work sometimes puts VFAN staff, trustees and volunteers in contact with children and vulnerable adults, whom VFAN and its partners have a duty of care to safeguard. This policy lays out the commitments made by VFAN, and informs all staff and associated personnel of their responsibilities, in relation to safeguarding.

VFAN will not tolerate any contravention of this policy. Any breach of this policy is likely to constitute a serious disciplinary, contractual and potentially criminal matter for the individual concerned and may cause serious damage to the reputation and standing of VFAN.

The protection and safeguarding of children and vulnerable adults is paramount to this policy, but it also recognises that the impact of any breach of any relevant legislation has far wider repercussions than the punitive measures taken by legislative and regulatory bodies against both individuals and VFAN as an organisation. As such, this policy enables the organisation to have some protection, both at a reputational level and for the individual.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under VFAN's Global Bullying and Harassment Policy
- Safeguarding concerns in the wider community not perpetrated by VFAN staff or associated personnel

2. What is Safeguarding?

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment, from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur. In the sector in which VFAN operates, the term often refers to the safety and welfare of people involved in the delivery or receipt of development assistance.

3. Policy Aims

The aims of this policy are to:

- Protect people, particularly children, at risk adults and beneficiaries of assistance, from harm and abuse of all kinds in the delivery of VFAN's and its partners' work. This includes harm arising from:
 - The conduct of staff or personnel associated with VFAN and its partners
 - The design and implementation of VFAN's programmes and activities
- Enable all staff, trustees and volunteers of VFAN and its partners to respond in an informed, appropriate and confident manner to safeguarding issues in the execution of VFAN's work.

4. Scope

For the purposes of this policy, children are defined as those individuals aged 16 years and younger. A vulnerable or at risk adult is someone aged 16 or over who is, or may be, in need of community services due to age, illness or a mental or physical disability or who is, or may be, unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation (definition from the UK Department of Health, 2002).

This policy applies to all individuals working at or with VFAN, including but not limited to: VFAN employees (whether permanent, fixed-term or temporary); consultants; contractors; volunteers; agency staff; trustees; partner organisations; donors, suppliers and programme visitors, acting for or on behalf of VFAN and who may come into contact with children and vulnerable adults, within the UK and on VFAN business internationally. All relevant parties will be provided with access to a copy of this policy.

While VFAN does not work directly with children and vulnerable adults in the UK, this policy is applicable to UK based staff who travel internationally to visit, monitor, learn about or support VFAN programmes as well as those staff working in countries where VFAN has programme activity.

This VFAN policy also applies to all national/international partners that VFAN chooses to partner with. All partners must demonstrate that they have their own safeguarding policy. If they do not, they will either be required to adopt VFAN's policy or create their own before any partnership agreement or MoU is signed. This requirement will be included as a term of all partnership agreements and MoUs entered into by VFAN and its partners.

5. Recruitment

VFAN is committed to ensuring that safeguarding is integral to our recruitment processes.

All jobs advertised will be with a job description and person specification and will state that the successful candidate is expected to adhere to all relevant VFAN policies, including the Global Safeguarding Policy. References will always be followed up and VFAN reserves the right to contact any previous employers, not just those cited as referees.

6. Education and Training

VFAN will ensure that all staff, trustees and volunteers have access to this policy, understand it and agree to adhere to it.

- Induction of new employees, trustees and volunteers will include a briefing on safeguarding issues, including an overview of the policy. Each individual will be required to read the policy in detail and sign to demonstrate that they understand the policy and agree to adhere to it.
- Existing staff, trustees and volunteers will receive a briefing on safeguarding issues, including an overview of the policy. Each individual will be required to read the policy in detail and sign to demonstrate that they understand the policy and agree to adhere to it.
- All staff, trustees and volunteers will be required to attend a governance policies and procedures refresher training session on a bi-annual basis and each individual will be required to sign the policy to demonstrate that they understand and agree to adhere to it.
- Local partners will receive a copy of VFAN's Global Safeguarding Policy.

7. Programme Design and Implementation

VFAN will design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with VFAN. This includes the way in which information about individuals in our programmes is gathered and communicated.

The following measures will be taken during the programme design phase:

- The potential risks presented by programmes, and the contexts in which they are to take place, will be identified and addressed.
- Programme plans and budgets will include activities and funding lines for safeguarding capacity building, risk assessment, prevention, training, awareness raising, communications, and safeguarding report response.
- The local and national safeguarding mechanisms and related support services will be identified and documented for referral.
- Programmes will be monitored for their safety, and for any safeguarding concerns or reports disclosed.
- If a programme is presenting a risk of harm, it will be adapted or redesigned.

8. Staff Behaviour - Good Practice Guidelines

VFAN's Code of Conduct outlines appropriate and expected standards of behaviour to everyone, including children and vulnerable adults. There may be minor variance dependent on cultural norms, but those accepted in the UK should always be used as the base reference point.

VFAN staff, trustees and volunteers must make an attempt to understand the local norms around physical contact between children and adults.

Whilst engaged in VFAN activities all staff, trustees and volunteers who come into contact with beneficiaries are required to:

- Treat the children and vulnerable adults we interact with, with respect and dignity
- Ensure that their health and safety is paramount at all times during our interactions
- Liaise openly with parents/guardians and other family members
- Only use physical contact if absolutely necessary, and during eye examinations, explain what that contact may be
- Avoid being alone with children
- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Global Safeguarding policy
- Listen to any disclosures/allegations/concerns of abuse, whether it is from or relates to children or adults
- Report any such disclosures/allegations/concerns immediately to the Head of Finance and Operations (in the case of the allegation being made about the Head of Finance and Operations, to the CEO).

Relating to **child safeguarding**, VFAN and partner NGO staff, trustees, volunteers must never:

- hit or otherwise physically assault or physically abuse children
- develop physical/sexual relationships with children
- develop relationships with children which could in any way be deemed exploitative or abusive
- engage in any commercially exploitative activities with children including child labour or trafficking
- act in ways that may be abusive or may place a child at risk of abuse or neglect
- use language, make suggestions or offer advice which is inappropriate, offensive, sexually explicit or abusive
- behave in a manner which is inappropriate or sexually provocative in the presence of a child or children
- have a child/children with whom they are working to stay overnight at their home unsupervised
- sleep in the same room or bed as a child with whom they are working
- do things for children of a personal nature that they can do for themselves
- condone, or participate in, activity (relating to children) which is illegal, unsafe or abusive

- act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional or psychological abuse
- discriminate against, show differential treatment, or favour particular children to the exclusion of others.

Relating to **adult safeguarding**, VFAN and partner NGO staff, trustees, volunteers must never:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect.

Relating to protection from sexual exploitation and abuse (PSEA)¹, VFAN and partner NGO staff, trustees, volunteers must never:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

This is not an exhaustive or exclusive list. The principle is that staff should avoid actions or behaviour which may constitute poor practice or potentially abusive behaviour.

It is important for all staff and others in contact with children and vulnerable adults to:

- plan and organise their work, the workplace and their interactions to minimise risks
- ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed
- ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
- talk to children and vulnerable adults about their contact with staff or others and encourage them to raise any concerns
- empower children and vulnerable adults - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.

¹ This term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB2003/13)

9. Reporting and Responding to Safeguarding Concerns Procedure

Enabling reports

VFAN will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. VFAN will also accept complaints from external sources such as members of the public, partners and official bodies.

VFAN will ensure that all concerns raised are taken seriously and will act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.

Any staff reporting concerns or complaints will be protected by VFAN's Global Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to the Safeguarding lead or their line manager. If the staff member does not feel comfortable reporting to the Safeguarding lead or their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate senior member of staff.

Where misconduct or alleged abuse is suspected, or there is a complaint against a member of staff, trustee or volunteer of VFAN, its partner NGOs or a health worker, teacher or community member, that complaint should then be reported immediately to VFAN's leadership (the Head of Finance and Operations in the first instance, but if the complaint is regarding the Head of Finance and Operations, then to the CEO).

In reporting and responding to safeguarding issues the best interest and welfare of the child(ren) or vulnerable adult(s) should be paramount.

Responding to reports

1. Report is received

1.1 Reports can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the Safeguarding lead or their line manager.

1.2 If a safeguarding concern is disclosed directly to a member of staff, the person receiving the report should bear the following in mind:

- Listen
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation
- Report to the Safeguarding lead or their line manager

1.3 The person receiving the report should then document the following information, using an Incident Report Form (Annex B):

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Dates(s), times(s) and location(s) of incident

1.4 The person receiving the report should then forward this information to the Safeguarding lead or their line manager within 24 hours.

1.5 Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.

1.6 If the reporting staff member is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Board, or to an external statutory body. The staff member will be protected against any negative repercussions as a result of this report. See VFAN's Global Disclosure of Malpractice in the Workplace Policy.

2. Assess how to proceed with the report

2.1 Appoint a Decision Maker for handling this report. The Decision Maker should be a senior staff member (Chief Executive or trustee), not implicated or involved in the case in any way.

2.2 Determine whether it is possible to take this report forward:

- Does the reported incident(s) represent a breach of the Global Safeguarding Policy?
- Is there sufficient information to follow up this report?

2.3 If the reported incident does not represent a breach of the Global Safeguarding Policy, but represents a safeguarding risk to others (such as a child safeguarding incident), the report should be referred through the appropriate channels (eg. local authorities) if it is safe to do so.

2.4 If there is insufficient information to follow up the report, and no way to ascertain this information (for example if the person making the report did not leave contact details), the report should be filed in case it can be of use in the future, and look at any wider lesson learning we can take forward.

2.5 If the report raises any concerns relating to children under the age of 18, **seek expert advice immediately**. If at any point in the process of responding to the report (for example during an investigation) it becomes apparent that anyone involved is a child under the age of 18, the Decision Maker should be immediately informed and should seek expert advice before proceeding.

2.6 If the decision is made to take the report forward, ensure that there is the relevant expertise and capacity to manage a safeguarding case. **If VFAN does not have this expertise in-house, seek immediate assistance**, through external capacity if necessary.

2.7 Clarify what, how and with whom information will be shared relating to this case. Confidentiality should be maintained at all times, and information shared on a need-to-know basis only. Decide which information needs to be shared with which stakeholder – information needs may be different.

2.8 The report may be dealt with through separate VFAN policies depending on the type of concern the report relates to. For example workplace sexual harassment is dealt with through VFAN's Global Bullying and Harassment policy. If there isn't a policy for the type of report that has been made, continue to follow these procedures.

2.9 Check your obligations for informing relevant bodies when a safeguarding report is received. These include, but are not limited to:

- Funding organisations
- Umbrella bodies/networks
- Statutory bodies (such as the Charity Commission in the UK)

Some of these may require you to inform them when you receive a report, others may require information on completion of the case, or annual top-line information on cases. When submitting information to any of these bodies, think through the confidentiality implications very carefully.

3. Appoint roles and responsibilities for case management

3.1 If not already done so (see above), appoint a Decision Maker for the case.

3.2 If the report alleges a serious safeguarding violation, it may be necessary to hold a case conference. This should include:

- Decision Maker
- Person who received the report (such as the safeguarding lead, or manager)
- HR representative or external safeguarding adviser if there is one

The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders (see below).

4. Provide support to survivor where needed/requested

4.1 Provide appropriate support to survivor(s) of safeguarding incidents and/or harm caused by staff or associated personnel. Nb. this should be provided as a duty of care even if the report has not yet been investigated. Support could include, but is not limited to:

- Psychosocial care or counseling
- Medical assistance
- Protection or security assistance (for example being moved to a safe location)

4.2 All decision making on support should be led by the survivor.

5. Assess any protection or security risks to stakeholders

5.1 For reports relating to serious incidents: undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders or beneficiaries involved in the case, and develop a mitigation plan if required.

5.2 Continue to update the risk assessment and plan on a regular basis throughout and after the case as required.

6. Decide on next steps

6.1 The Decision Maker decides the next steps. These could be, but are not limited to:

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation's remit)
- Investigation is required to gather further information
- Immediate disciplinary action if no further information needed and the Subject of Concern is a VFAN member of staff, trustee or volunteer
- Referral to relevant authorities and agencies

6.2 If the report concerns associated personnel (for example contractors, consultants or suppliers), the decision making process will be different. Although associated personnel are not staff members, VFAN has a duty of care to protect anyone who comes into contact with any aspect of our programmes from harm.

VFAN cannot follow disciplinary processes with individuals outside the organisation, however it can recommend disciplinary or misconduct investigations be carried out by partner NGOs and decisions may be made to terminate a contract with a supplier based on the actions of their staff, for example.

6.3 VFAN recognises that it may not always be best placed to ascertain whether a child or vulnerable adult has been abused.

If an investigation is required but there is not the internal capacity or expertise required to conduct it, identify and engage the services of external expert advice and resources to conduct the investigation. Determine which budget this will be covered by.

7. Manage investigation if required

7.1 Refer to external guidelines for investigating safeguarding reports, such as the [CHS Alliance Guidelines for Investigations](#).

8. Make decision on outcome of investigation report

8.1 The Decision Maker makes a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for staff misconduct.

8.2 If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities *unless this may pose a risk to anyone involved in the case*. In this case, the Decision Maker together with other senior staff will need to decide how to proceed. This

decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

9. Conclude the case

9.1 Document all decisions made resulting from the case clearly and confidentially.

9.2 Store all information relating to the case confidentially, and in accordance with VFAN policy and local data protection law.

9.3 Record anonymised data relating to the case to feed into organisational reporting requirements (eg. serious incident reporting to Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases.

10. Ramifications of Misconduct

Following an allegation of abuse or violation of the Global Safeguarding Policy by a VFAN employee, trustee or volunteer, that individual will be suspended until an investigation is completed. The decision to suspend will be taken by the Chief Executive and/or the trustees.

If any individual associated with VFAN is found to have violated the Global Safeguarding Policy or committed acts in relation to children or vulnerable adults that are criminal or grossly infringe children's rights, VFAN's disciplinary procedure will be invoked. This may include:

- Employees: disciplinary action or dismissal
- Trustees, volunteers, interns: ending the relationship with VFAN
- International/national partner organisations: withdrawal of funding/support and ending the relationship with VFAN
- Consultants/contractors: termination of contract
- Referral to police

All stages of this process of dealing with a safeguarding concern, including the investigation and possible subsequent disciplinary process, will be confidential and information limited to only those that need to know. All parties involved will be required to keep all information relating to the case confidential and all documentation will be filed securely.

11. Review of this Policy

This policy will be reviewed by VFAN's Senior Management Team on an annual basis, with any changes approved by the Board of Trustees, and with ownership of updates resting with the Head of Finance and Operations.



This policy was adopted by the Trustees of Vision for a Nation Foundation on 18th September 2018.

A handwritten signature in black ink, appearing to read "John Rhodes", written above a horizontal line.

John Rhodes
Trustee (Chairman)

A handwritten signature in black ink, appearing to read "Tony Hulton", written above a horizontal line.

Tony Hulton
Chief Executive



Annex A: VFAN Global Safeguarding Policy Compliance Form

I have received and been briefed on the VFAN Global Safeguarding Policy and fully understand my responsibilities to comply with the Policy.

Name	
Position within VFAN	
Signature	
Date	

Annex B: Safeguarding Incident Report Form

Date	
Name of staff member this completing form	
Name of person making the report	
Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above	
Name(s) of alleged perpetrator(s)	
Description of incident(s) Please include dates(s), times(s) and location(s) of incident(s) (if known)	