



# Safeguarding Policy

## Introduction

Development Initiatives (DI) acknowledges the duty of care to **safeguard** and promote the **wellbeing** of children, vulnerable adults and any person whom we employ or work alongside, without discrimination (age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socio-economic background) and to **protect** them from harm.

We acknowledge that some children and adults, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse, neglect or exploitation and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

We are committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice.

We seek to safeguard *everyone* in our organisation, including protecting our staff from inappropriate behaviour such as bullying and harassment and continually look to promote a climate of trust and a culture of honest feedback where people flourish.

## Who is covered by this policy

This policy applies to anyone ('our staff') working on behalf of Development Initiatives in all our country offices ('DI' or 'we/us') which will include employees (permanent and temporary), interns, volunteers, board members, contractors (suppliers), fellows, self-employed consultants, DI partners' staff and agency staff, community members and describes the standards of behaviour expected.

All our staff must agree and comply with our Code of Responsible Conduct (see Annex 2).

## Culture and values

Our values are at the forefront of our thinking and our integrity is derived from our values. They embody the type of organisation we are and how we behave towards one another, our partners, stakeholders and beneficiaries and they empower us to continually ensure we are the type of organisation we want to be.

Our organisational values and behaviours embody empowerment, transparency, innovation, agility, and quality.

Our culture and our values support a safe and trusted environment where we can promote well-being and welfare and allow our people to thrive.

## How we work

Whilst we do not work directly with vulnerable groups, we acknowledge that there are occasions when our personnel may encounter them when working with partner organisations and we agree to follow any Code of Conduct issued by partner organisations and uphold their

principles. This policy will enable DI to demonstrate its commitment to keeping safe any vulnerable groups it encounters, together with everyone working within DI.

We have an appointed Designated Safeguarding Lead (DSL) who acts as the first point of contact for any safeguarding incidents or concerns and who will ensure we have appropriate support and training in place, policies are understood and followed and is responsible for the safeguarding register.

We are committed to safer recruitment:

- Our reference requests ask if the referee is aware of any current safeguarding concerns and if they feel that the applicant is suitable to work with children and/or vulnerable adults and this is referenced in our Recruitment Policy. References carried out are proportionate and relevant to the position concerned.
- Candidates will have their employment history verified, including any gaps between employment
- Candidates will have their identity checked and verified
- We will ensure that adequate training on safeguarding is provided to all staff with responsibilities of human resources and/or leading recruitment process.

We do not work directly with children or vulnerable adults and are not working in regulated activity and as such are not entitled by law to request for Disclosure and Baring Service (DBS) checks on employees in the UK. Should this change in the future, we will introduce DBS checks for any employee working with children or vulnerable adults

We are committed to ensuring all our staff are trained to an appropriate level on safeguarding and other relevant safeguarding policies. This will happen in the following ways:

1. Staff Induction: All staff will be guided through the Safeguarding Policy by a member of the HR team. The objectives of this are:
  - For staff to understand our safeguarding policy
  - For staff to understand the disclosure procedure and who they need to talk to regarding safeguarding concerns
  - For staff to read and sign our Code of Responsible Conduct.
2. Designated Safeguarding Lead (DSL), Deputy DSL and Country DSL
  - External training: The DSL, DDSL and CDSL will seek opportunities to attend appropriate safeguarding training and/or conferences
  - Quarterly reviews: At Board meetings the DSL ensures that safeguarding is always an agenda item and shall appear on the organisational risk register and shall propose amendments if required
  - The Board will be made aware of any suspected breach of policy

In addition to our duty to keeping safe any vulnerable groups we encounter when working with partner organisations, we also have a duty to safeguard **everyone** in our organisation including protecting our own staff from inappropriate behaviour.

As part of our safeguarding policy we will:

- promote and prioritise good practice around the safety and wellbeing of children, vulnerable adults and any person working for or with us
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children, vulnerable adults and any person working for or with us

- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- prevent the employment/deployment of unsuitable individuals using safer recruitment best practice and ensuring all necessary checks are completed
- ensure robust safeguarding arrangements and procedures are in operation
- inform all visitors of our policies and safeguarding expectations.
- endeavor to keep up to date with national developments relating to preventing abuse and welfare of adults
- ensure that the Designated Safeguarding Lead understands his/her responsibility to refer incidents of abuse to the relevant statutory agencies (Police/Department for International Development/Charity Commission)

In order to implement the policy, we will work to:

- promote the freedom and dignity of the person who has or is experiencing abuse
- promote the rights of all people to live free from abuse and coercion
- manage services in a way which promotes safety and prevents abuse
- recruit staff safely, ensuring all necessary and appropriate checks are made
- provide effective management through supervision, support and training.

## Related Policies and Procedures

We are committed to putting in place safeguards and measures to reduce likelihood of harm taking place within our work and to ensure that those involved with our work will be treated with respect.

Therefore, this policy needs to be read in conjunction with the following existing DI policies and procedures and other policies:

- Modern Slavery and Human Trafficking Statement
- Partner Code of Conduct
- Conflict of Interest Policy
- Whistleblowing Policy
- Recruitment Policy
- Fair Treatment and Acceptable Conduct
  - Equality and Diversity
  - Grievance
  - Disciplinary
  - Equal Opportunities
  - Dignity at work
  - Values and Expectations
  - Capability
- Wellbeing and Personal Safety
  - Drugs and/or alcohol problems
  - Stress management
  - Appropriate Equipment
  - Work-life Balance
  - Travel and lone workers
- Data Protection
- Risk Management Policy and Risk Register
- Duty of Care procedures

## How to share concerns if you consider someone is at risk

There may be situations where you are unsure whether your concern is 'reasonable' but in these situations, your concern should not be ignored. You should not assume that a colleague or other person will act, and early information sharing is vital. You should also feel confident that you can raise a concern about poor practices and know that your concerns will be taken seriously.

If you have information which suggests an individual has:

- behaved in a way that has harmed or may have harmed a child or vulnerable adult
- possibly committed a criminal offence against, or related to, a child or vulnerable adult
- behaved towards a child/children or vulnerable adult/s in a way that indicated they are unsuitable to work with children or vulnerable adults
- repeatedly bullied, harassed or used intimidating behaviour.

You should take immediate action to prevent or minimise any further harm and report it. Internally, you can do this by phone, email or in person to:

- The Designated Safeguarding Lead (DSL): Janet Reilly, Director of Business & Finance. Email: [janet.reilly@devinit.org](mailto:janet.reilly@devinit.org) Tel: 00 44 (0) 1179 272 505
- Or to the Deputy Designated Safeguarding Lead: (DDSL) Jane McNeil, HR Manager. Email: [jane.mcneil@devinit.org](mailto:jane.mcneil@devinit.org) Tel: 00 44 (0) 1179 272 505
- Or to your Country Designated Safeguarding Lead (CDSL): Emily Omega (Africa). Email: [Emily.omega@devinit.org](mailto:Emily.omega@devinit.org)

If the DSL has not been contacted directly, then the DDSL or CDSL will complete an incident form and liaise with the DSL. The DSL will then liaise with the Executive Director and together will assess the severity of the matter and determine the route for further action. If the matter is serious and relates to work undertaken with a partner, then the partner organisation will be immediately informed. If the matter relates to poor practice or a breach of the code of responsible conduct, then an internal disciplinary investigation may be required.

If you feel that your concern has not correctly been addressed or taken seriously or if you feel unable to raise a concern with us, then whistleblowing channels are open to you.

Whistleblowing concerns should be raised with Tina Blazquez-Lopez, Board Member: Email: [tinablazquezlopez@hotmail.com](mailto:tinablazquezlopez@hotmail.com). Mobile: +971(0) 522140034

## Response

DI will follow up concerns according to policy and procedure and will apply appropriate measures to staff found in breach. Depending upon the nature and seriousness of the matter, this may lead to disciplinary action, dismissal or criminal prosecution following reporting of the case to the relevant authorities.

DI will offer support to survivors of harm, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding appropriate support will be led by the survivor and decided on a case by case basis.

## Confidentiality

Confidentiality is based upon mutual trust, respect and honesty. DI is committed to ensure that concerns shared are kept confidential such that all access to information will be on a “need to know” basis.

DI will ensure that any information shared is necessary, proportionate, relevant and accurate and will be shared securely and in a timely fashion. The DSL will use professional judgement to decide what information is appropriate to share unless there is a statutory duty or court order to share.

Safeguarding reports will be saved in a secure folder by the DSL alongside any decisions made on sharing. Reports will be anonymised before being shared externally.

Where possible, information will be shared with consent, but the lack of consent may be overridden in the public interest, for legal reasons or for the safety and wellbeing of the individual where the benefits of sharing outweigh keeping the information confidential.

The general data protection regulations are not a barrier to sharing information but provide a framework to ensure that information is shared appropriately to the relevant authorities.

## Further resources and relevant legislation

- Bond
- CHS Alliance PSEA Handbook
- Keeping Children Safe – Safeguarding Standards Handbook
- Inter-Agency Standing Committee Minimum Operating Standards on PSEA
- Department for Business, Energy & Industrial Strategy: Whistleblowing guidance and code of practice for employers
- UN Convention on the Rights of the Child
- The UN Statement for Preventing Sexual Exploitation and Abuse
- The Care Act 2014 and the Care and Support statutory guidance
- Adult safeguarding: statement of government policy
- National Child Protection Policy and Procedures
- The Human Rights Act 1998
- Mental Capacity Act 2007

(To be adapted for each Country)

## Policy Review

We are committed to reviewing our policies and practices every two years although may review this policy earlier in the event of changes to legislation. This policy was approved by the Board of Directors in January 2020.

# Annex 1

## Definitions

Vulnerable groups are children under the age of 18 years and adults at risk/vulnerable adults (that is anyone over 18 years of age who is vulnerable).

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

At risk adult- Sometimes also referred to as vulnerable adult. A person who is or may need care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Participant is any person who is participating in DI activities in a volunteer capacity, regardless of role, age or nationality.

Staff or Personnel is any person who is recruited into a paid position regardless of location of work or nationality.

Safeguarding and promoting well-being and welfare means:

- protecting the rights of adults to live in safety, free from abuse and neglect
- protecting children from maltreatment; preventing impairment of health or development; ensuring they are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable them to have the best outcomes
- protecting our staff from inappropriate behaviour such as bullying and harassment

Regulated Activity is work which involves close and unsupervised contact with vulnerable groups, and which cannot be undertaken by a person who is on the Disclosure and Barring Service's Barred List

Best interest of the child - An overarching principle in the Convention on the Rights of the Child: "in all actions concerning children, whether undertaken by public or private institutions, the best interest of the child should be a primary consideration. In all matters affecting the child the views of the child should be important and given due weight in accordance with the age and maturity of the child."

Protection of vulnerable groups - Prevention and response to abuse, neglect, exploitation and violence, including all measures, structures and services that a society put in place for prevention and response.

Harm -Psychological - physical and any other infringement of an individual's rights

Abuse can be physical or mental - there are several forms of abuse including:

### *a) Physical abuse*

Physical abuse is the use of physical force against an individual that results in injury and harm. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching,

kicking, biting, burning, strangling and poisoning. All forms of corporal punishment are to be viewed as physical abuse.

*b) Emotional/ mental abuse*

Emotional abuse is harm done by persistent or severe emotional ill treatment or rejection, such as degrading punishment, threats, bullying, not giving care and affection resulting in adverse effects on the behaviour and emotional development of the individual. Other harmful experiences such as frequently being forced to witness violence in their domestic environment are also classified as mental abuse.

*c) Neglect*

Neglect is understood as the failure by a parent or caregiver to provide a vulnerable individual (when they can do so) with the conditions that are culturally accepted as being necessary for their physical and emotional development and wellbeing. Neglect of children and vulnerable adults with disabilities are more common than neglect without disabilities and is often under-reported.

*d) Sexual abuse*

Sexual abuse is any kind of sexual activity involving vulnerable groups, whether or not the individual is aware of or consents to what is happening. Sexual abuse implies the use of a child under the age of 18 or an adult at risk/vulnerable adult for sexual gratification. Sexually abusive behaviour include rape, incest, fondling genitals, masturbation, voyeurism, exhibitionism and exposing or involving the vulnerable individual in pornography or any other sexual activity, real or simulated, including on the internet or in any other medium.

*e) Protection from Sexual Exploitation and Abuse (PSEA)*

PSEA is a term used by the UN and NGO community to refer to measures taken to protect vulnerable individuals from sexual exploitation and abuse. Exploitation of a vulnerable individual may refer to the use of that individual for work or other activity for economic gain which may be hazardous or harmful to the individual's health or development or interfere with their education.

*f) Harmful traditional practices*

These refer to cultural rituals, traditions or other practices that have a harmful and negative impact on the life, health, physical and psychological integrity and development of a child. Such traditions include Female Genital Mutilation (FGM) and forced early marriage. They may also include different forms of ritual ceremonies involving children forcefully in harmful religious or spiritual activities, especially as children with disabilities may be at higher risk of becoming victims of witchcraft beliefs in certain contexts for example children with albinism.

Direct Incident -The incidents involved in DI or partner staff member / volunteer/ representative, etc.

Indirect Incident- The incidents that don't involve a DI or partner staff member / volunteer/ representative but has been reported, observed or suspected.

# Annex 2

## Code of Responsible Conduct

I, (insert full name) ....., acknowledge that I have read and understood the Safeguarding Policy and Code of Responsible Conduct and by signing this document, I confirm that I :

- Agree to comply with all policies and procedures as mentioned in this document
- Agree to report any concerns or incidents in line with the procedures set out in the appropriate DI policy or the policy of a partner organisation, if appropriate.
- Understand that the Code of Responsible Conduct and the Safeguarding Policy are for my guidance and protection and for the protection of others.

I also confirm that I will:

- Be committed to playing my part in creating a culture of trust, transparency and mutual accountability at work.
- Protecting staff from inappropriate behaviour such as bullying and harassment
- Help create and/or uphold an environment where vulnerable groups are listened to and respected as individuals.
- Ensure that if interacting with vulnerable groups in a work context, that another adult is present or within reach and that any physical contact is appropriate.
- Use positive, non-violent methods to respond to the behaviour of vulnerable groups.
- Respect the dignity of vulnerable groups and their need to be safeguarded if taking photographs, filming or writing reports for work related activities and recognise that the safeguarding risk may arise, continue or increase after the activity is concluded or photo, film or report has been released.
- Ensure that if photographing, filming or interviewing vulnerable groups, that usage and risks have been explained, consent has been obtained and recorded, and individuals feels they are presenting themselves with dignity.
- Recognise that deliberately favouring some individuals to the exclusion of others can lead to further ostracising them from their peer group.
- Protect and handle personal data of vulnerable individuals with care.
- Respond to all concerns, allegations or disclosures.
- Comply with any investigation and make available any information necessary.
- Immediately report any safeguarding concerns using the channels explained in the Safeguarding Policy.

Signature:

Date:

# Annex 3

## Safeguarding Incident Form (Confidential)

To be completed by the DSL, the DDSL or the CDSL

Name		Role	
Details of the person raising the concern			
Name		Role	
Organisation		Location	
Reporting category (tick)	<input type="checkbox"/> Reporting own concerns or own observations <input type="checkbox"/> Reporting concerns raised by someone else		

### Nature of Concern

Concern category (tick)	<input type="checkbox"/> Relates Directly to DI staff member or DI representative <input type="checkbox"/> Relates to DI partner staff member or representative <input type="checkbox"/> Relates to a community member(s) that DI is working with <input type="checkbox"/> Safeguarding – internal <input type="checkbox"/> Safeguarding - external <input type="checkbox"/> Whistleblowing		
Risk Level (tick)	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low		
Date of Incident		Date reported	
Location of Incident			
What is the PRIMARY concern? Please tick only one box	<input type="checkbox"/> Physical <input type="checkbox"/> Bullying <input type="checkbox"/> Mental Health <input type="checkbox"/> Sexual <input type="checkbox"/> Emotional <input type="checkbox"/> Child Sexual Exploitation <input type="checkbox"/> Other (please specify)		
<p><b>Details of concern:</b> <i>It is important that this is recorded clearly and accurately, using the words of the person reporting it where possible. Include other relevant information, such as description of any injuries or mistreatment and whether recording this incident as fact, opinion or hearsay and details of any witness accounts. Take as much space as needed.</i></p>			
Is the person raising the concern aware and in agreement that this is being reported to the DSL/DDSL/CDSL?			Yes / No

<i>If 'No' please explain why not.</i>		
<b>Did this happen during working hours / during delivery of projects?</b>	Yes / No / Don't Know.	<i>If 'No' please specify:</i>
<b>Are other agencies/partners involved? (circle)</b>	Yes / No / Don't know	<i>If 'Yes' please provide further details:</i>
<b>What are your immediate actions and what measure have been taken to protect any vulnerable individual(s)?</b>		

### Reporting

<b>Reported to the Executive Director (circle)</b>	Yes / No	<b>Date</b>	
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*Signature of Person raising concern:*

*Signature of Person receiving above:*

*Signature of DSL:*

### For Office Use and DSL

<b>Logged onto Safeguarding Register by:</b>			
<b>Incident ID No.</b>		<b>Date</b>	

### Follow up action taken

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# Annex 4

## Internal Investigation Temple (Confidential)

Can be used unless Witness Statements have been gathered under an HR process

Name of Investigator	
Role	
Date	
Overview of incident/s (Time, date, facts)	
Witness / Complainant / Survivor Statement (please continue on additional sheets if required)	
Staff member statement (please continue on additional sheets if required)	
Actions	
Staff member signature	
Investigator signature	

# Annex 5

## Technical aspects of the safeguarding Incident Form (Confidential)

Any disclosure, allegation or concern will be treated seriously. DI will identify and monitor the origin of a concern and the level of risk posed to the individual/s.

### 1. Categorisation of those reporting a disclosure / concern

<b>Category 1</b>	This concern relates directly to a staff member or representative. DI has a duty of care and will respond by initiating an investigation by the DSL with optional support from an impartial and independent person.
<b>Category 2</b>	This concern relates to a DI Partner staff member. DI has a partial duty of care and will require the Partner to initiate an investigation in line with their Safeguarding policy. DI would expect the Partner to share the final report with them to ensure transparency and accountability.
<b>Category 3</b>	This concern relates to abuse in a community in which DI is working. While DI will not have a formal responsibility to investigate, DI may have some influence in the community and will assess the level of risk and either pass on information to the relevant local authorities or offer advice to third party referrals (i.e. INGO Helplines). In each case an assessment should be made of what is in the best interest of the individual at risk in relation to reporting the allegation to the authorities or referring to an independent body.

### 2. Tiers of risk towards the individual/s reporting a disclosure/ complaint

Risk will vary depending on the circumstance of the complaint / disclosure. Any incident whether deemed high, medium or low will be added to the safeguarding register. Risk shall be communicated in the following way:

Risk Level	Risk (Multiple factors)	Mitigation
High	<ul style="list-style-type: none"> <li>- Threat to life or fatality on project</li> <li>- Sexual Assault or Allegation</li> <li>- Individual/s in immediate harm</li> <li>- Images of child pornography found on laptop</li> <li>- Employee found to be on sex offenders register</li> <li>- Widespread culture of bullying</li> </ul>	<ul style="list-style-type: none"> <li>- Prioritise safety of those in our care - Find safe space</li> <li>- Inform DSL/DDSL/CDSL immediately</li> <li>- Serious incident and requires reporting to appropriate external partner/organisation/ authority</li> </ul>
Medium	<ul style="list-style-type: none"> <li>- Major Incident that does not threaten life but causes injury</li> <li>- Individual/s currently safe from harm though risk is high</li> </ul>	<ul style="list-style-type: none"> <li>- Assess and monitor the level of immediate and short-term risk to individual/s</li> <li>- Put in place a short-term action plan and assign designated safe space</li> <li>- Inform DSL/DDSL/CDSL immediately</li> </ul>
Low	<ul style="list-style-type: none"> <li>- Mental Health and Inclusion needs not being addressed by employer</li> <li>- Misconduct in office environment <i>i.e. Using unprofessional language with staff, posting inappropriate messages on social media about DI or colleagues.</i></li> <li>- Isolated incidents of bullying</li> <li>- 'One-off' errors where no significant harm</li> </ul>	<ul style="list-style-type: none"> <li>- Assess and monitor the level of immediate and short-term risk to individual/s</li> <li>- Hold 1:1 with individual to gauge Safeguarding / Whistleblowing / Disciplinary concern and report to the DSL/Deputy/CDSL for further actions.</li> </ul>

# Annex 6

## Support or engagement obligations to the survivor / whistle-blower

A judgement needs be made at an early stage as to whether the incident warrants a full, immediate safeguarding response. This is the product of subjectivity and should be confirmed with the DSL/Deputy/CDSO if there is any doubt. The following is a guide, but not definitive. If the urgency is **Red**, please phone the incident through immediately, then email paperwork when the person is safe. If the urgency is **Yellow**, please email DSL/DDS/CDL

Examples of incident	Required action
<ul style="list-style-type: none"> <li>• Rape or Serious sexual assault</li> <li>• Threat of, or actual serious self- harm</li> <li>• Threat of suicide</li> <li>• Any issue that requires immediate confidential response to prevent further harm to any individual</li> <li>• Serious physical assault or serious psychological harm.</li> </ul>	<ul style="list-style-type: none"> <li>• Immediate communication to DSL/Deputy/CDSL</li> <li>• Complete Safeguarding Incident Form including full details and share with DSL/Deputy/CDSL</li> <li>• Counselling sessions via Simply Health or another approved provider</li> <li>• Report to the police after agreement with the survivor</li> <li>• Escalate the incident to external partner/authority as appropriate</li> </ul>
<ul style="list-style-type: none"> <li>• Disclosure of historical harm where there is no immediate concern of ongoing harm</li> <li>• Threat of, or actual minor self-harm</li> <li>• Sexual harassment</li> <li>• Issues picked up on training, assessment or any other context that point to evidence of harm in home life.</li> <li>• One off incident of minor physical assault or minor psychological harm.</li> </ul>	<ul style="list-style-type: none"> <li>• ASAP communication to DSL/Deputy. Can be via email/phone or in person.</li> <li>• Complete Safeguarding Incident Form and share with DSL/Deputy.</li> </ul>

When reporting the incident to an external partner/authority, please follow the Charity Commission definition of serious incidents or guides provided by the external partner.