



## **Child and Vulnerable Adults Safeguarding Policy**

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## 1. Purpose

The purpose of this policy is to protect people, particularly children, vulnerable adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with ADD International. This includes harm arising from:

- The conduct of staff or personnel associated with ADD International;
- The design and implementation of ADD International's programmes, partners and activities.

The policy lays out the commitments made by ADD International and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under ADD International's Global HR Policy and Code of Conduct for staff;
- Safeguarding concerns in the wider community not perpetrated by ADD International or associated personnel or direct partners.

## 2. Scope

The policy applies to all:

- Staff (based in the UK and overseas)
- Trustees and other Board Committee members
- Contractors and consultants
- Advisers
- Partner Organisations<sup>1</sup>
- Volunteers and interns
- Journalists, photographers, film/TV producers
- Participants and Trainees
- Visitors

In this policy "staff" or "staff member" is taken to refer to all these categories.

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<sup>1</sup> Partner organisations are required to sign up to this policy as well as have their own safeguarding policies in place (checked by ADD International as part of the due diligence and contracting processes)

### **3. Child and Vulnerable Adult Safeguarding Policy Statement**

Safeguarding means protecting a child's and vulnerable adults' right to live in safety, free from harm and neglect. ADD International has a strong commitment to the welfare of all those involved in the scope of our work including through our partners, and their protection from abuse and exploitation. We want to develop and maintain an organisational environment that is free of harassment, abuse and exploitation, and to ensure the same in all our work with communities.

We know that the children and vulnerable adults in the communities with whom we work can be particularly at risk and ADD is committed to preventing and bringing an end to both the risks and experience of abuse and neglect, while at the same time making sure that the child's and adult's wellbeing is promoted including, where appropriate, having regards to their views, wishes, feelings and beliefs in deciding on any actions.

In line with Article 19 of the United Nations Convention on the Rights of the Child (UNCRC), ADD International's policy states that all children have a right to protection, from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has the care of the child. Furthermore, this right is extended to all vulnerable adults with whom ADD comes into contact.

ADD International is committed to the principle that children and vulnerable adults should be safe and protected from harm. ADD believes that:

- The welfare of children and vulnerable adults is paramount.
- All children and vulnerable adults have the right to protection from harm irrespective of their age, culture, disability, gender, language, racial origin, religious beliefs, pregnancy / maternity, gender reassignment and/or sexual orientation.
- Our physical and virtual spaces should be safe and secure and promote enjoyable and positive experiences.
- All suspicions and allegations of harm should be taken seriously and responded to speedily and appropriately.
- All staff should be aware of their responsibility to ensure the safeguarding of children and vulnerable adults.
- Our recruitment processes should ensure that our staff do not pose a risk of harm to children or vulnerable adults.

ADD International commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

## 4. Definitions and Core knowledge

In order to safeguard the welfare of children and vulnerable adults all Trustees and staff need an understanding of common safeguarding terms.

### 4.1. Definition of a child and a vulnerable adult

The UNCRC Convention (Article 1) defines a '**child**' as a person below the age of 18, unless the laws of a particular country set the legal age for adulthood younger. For clarity, the term 'child' is used in this document to denote anyone under the age of 18. Where there is a discrepancy in age definitions between the laws of a country and this policy then the upper age limit should prevail in triggering ADD's safeguarding procedures, whilst accepting the fact that it may not be possible to take action under the laws of the country involved. Safeguarding incidents should nonetheless be investigated under this policy.

A **vulnerable adult** is a person aged 18 or over who has the right to be protected from violence, abuse, neglect or exploitation, and to make informed decisions free from duress or influence or impairment. This impairment could relate to the following factors: physical or mental disability; illness; old age; emotional fragility or distress; gender; ethnicity; religious beliefs or otherwise. Vulnerability can be temporary or indefinite and should be seen as a continuum which reflects the shifting nature of vulnerability in the context of our work.

### 4.2. What constitutes harm

Living a life that is free from harm and abuse is a fundamental human right for every person. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to prevent harm. Someone may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or by a child or children. We know that the children and vulnerable adults in the communities with whom we work can be particularly at risk.

Different types of harm can include the following:

- **Financial harm** (for example an individual is unclear or confused about where their money has gone);
- **Physical harm** (for example an individual has bruises or marks that they cannot properly explain);
- **Psychological harm** (for example an individual is being verbally bullied by others);
- **Sexual harm** (for example an individual is being sexually harassed or intimidated);
- **Neglect** (for example an individual is not washing or eating properly).
- **Abuse of authority or power** (for example a person is frightened to disagree or contradict someone who is pushing them for an answer)

The examples given above are not exhaustive, and there are many types of actions and behaviours that could be considered harmful to others. Deciding if something is abuse is complex and staff should be encouraged to report any concerns they have, however minor, rather than waiting until things

reach the level of abuse. Harm is not always easy to spot but the above give examples of situations to be aware of. Above all, trust your instincts – if something feels wrong, say something.

## 5. Prevention

By the nature of ADD's work, staff and representatives of ADD may come into contact with children and vulnerable adults. ADD must ensure, through awareness and personal and professional conduct, that staff and others minimise the risk to children and vulnerable adults.

ADD International will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy;
- Ensure that all staff and personnel named in the scope of this policy, including partners, will be required to sign up to this policy if undertaking work on behalf of ADD International.
- 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 ADD International. This includes the way in which information about individuals in our programmes is gathered and communicated;
- Work with partners to design, implement and monitor programmes that put the individual's rights first and ensure there are reporting mechanisms in place that allow community members to raise concerns with implementing partners or directly with ADD International;
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel (See Recruitment Policy for details)<sup>2</sup>;
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation and based on a risk assessment of the role in relation to their contact with vulnerable groups. Staff will also receive regular refresher training, and those with specific responsibilities for safeguarding will also receive specialist training e.g. for investigations.
- Follow up on reports of safeguarding concerns promptly and according to due process.

### 5.1. Codes of values and behaviour

ADD International's 'Values and Behaviours' and 'Code of Conduct' help build a safe organisation. Through defining what is and is not acceptable behaviour, good practice can be promoted and opportunities for abuse minimised (Ref: the Global HR Policy and Code of Conduct). All staff, Trustees and other representatives are required to sign up to the Code of Conduct and agree to abide by the Values and Behaviours and the Code at the time of joining the organisation.

Programmes that implement projects for children, families and communities, must be implemented in a safe environment.

ADD International's Global HR Policy also details its whistleblowing, disciplinary and grievance procedures, bullying and harassment, and equal opportunities policies.

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<sup>2</sup> ADD's Global HR and Recruitment Policies include stringent Job assessments, criminal record checks where needed and references for all personnel working with or for ADD International, in line with UK and international standards.

ADD International believes that all staff, Trustees, volunteers, personal and partners linked to ADD International uphold the safeguarding Code of Conduct at all times.

According to ADD's safeguarding Code of Conduct it is not permissible (and in some instances maybe unlawful) to:

- Use your position to intimidate, bully, threaten, discriminate against, coerce or undermine children and young people, adults, volunteers or staff;
- Behave or communicate with children, young people or adults in ways which seek to build inappropriate relationships in order to abuse or put them at risk;
- Use a relationship with a beneficiary or their family for personal gain. Gift-giving and the acceptance of presents should only take place in line with 'Hospitality and Gifts' policy explained in the Global HR Policy;
- Give special rewards or privileges in an attempt to build inappropriate relationships with children and young people or adults;
- Possess indecent images of children; this will always be reported to the police regardless of the explanation provided;
- Carry out your duties or volunteering whilst adversely affected by alcohol, solvents or drugs;
- Encourage or assist others to break the law in any way.

In addition, ADD International adheres to the Core Principles of the United Nation's Task Force on Preventing Sexual Exploitation and Abuse in Humanitarian Crises 2002 and updated in 2019<sup>3</sup>. These apply to implementing projects for children, families and communities and apply irrespective of whether there is an emergency situation or not.

- Sexual exploitation and abuse by staff constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with children is prohibited regardless of the age of majority or age of consent locally. A mistaken belief about a child's age is not accepted as a defence.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour are prohibited. This includes exchange of assistance that is due to beneficiaries.
- Any sexual relationship between staff and a person participating in, or benefitting from, an ADD programme that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of ADD's work. Where a staff member develops concerns or suspicions regarding sexual abuse or exploitation by a colleague, whether in the same organisation or not, s/he must report such concerns in accordance with the system and procedures in place.

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<sup>3</sup> [IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019 | IASC \(interagencystandingcommittee.org\)](https://www.interagencystandingcommittee.org/)

- Staff are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

All Trustees, staff, consultants, advisers, volunteers are expected to strictly adhere to these codes. Any breach of the codes will be subject to the disciplinary action according to the Global HR Policy.

### 5.2. Use of photos and information & visits by donors and media

Photographs, films and websites must show respect for children and adults, be in their best interest and conform to ADD International's standards on 'Use of Visual Images' and 'Ethical principles'. This includes prioritising their best interests over the opportunity for increased funding, positive public profile and advocacy purposes for ADD International.

ADD pays particular attention to pictures, images, videos or other likenesses of children and adults and/or information related to children and adults that could compromise their care and protection. These will not be made available through any form of communication media or funding application or report without proper protection, full voluntary informed consent and understanding of their use. Images with corresponding text which may identify a child or vulnerable adult should be removed and any identifying images or data will be stored securely. ADD will also change names as appropriate. *Any media or donor representatives will be chaperoned and will be obliged to adhere to these safeguarding protocols (including signing up to this policy).*

ADD will ensure that information generated from interviewing children and vulnerable adults is in accordance with the 'Interviewing Children Guidelines'.

### 5.3. Duty of Care

ADD International takes its duty of care for children and vulnerable adults seriously and aims to ensure that all our programmes and partner organisations comply with child and vulnerable adults safeguarding policies.

ADD staff and representatives should ensure that they are never alone with a child or vulnerable adult. There should be two adults with any group of children and/or vulnerable adults at all times, and the ADD staff / representatives should stay within sight of one another. ADD staff / representatives will not always know the full background of the second adult, but the 'Two adults principle' offers a higher level of protection than where an adult works alone with a child or vulnerable adult. ADD staff and representatives must stay vigilant in supervising individuals who are given access to children and vulnerable adults.

Further guidance on minimising the risk to children and communities will be detailed in the Safeguarding Guidance Document.

## **6. Roles and Responsibilities**

ADD International staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Policy;



- Report any concerns or suspicions regarding safeguarding violations by an ADD staff member or associated personnel to the appropriate staff member.

All Trustees, staff, advisers, volunteers and all linked personnel and partner organisations of ADD International who come in to contact with children and vulnerable adults have a duty of care to safeguard them and promote their welfare by following the procedures set out in this document. ADD International accepts no excuses and maintains a zero tolerance policy on safeguarding to eliminate undesirable behaviour.

Please see Annex 1 for further details on the Safeguarding Focal Points specific roles and responsibilities within ADD International.

## **7. Enabling Reports**

ADD will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. This includes working with partners to ensure that they put in place adequate reporting mechanisms that allow communities to raise issues and concerns on both the implementation of any interventions as well as the conduct of any staff or personnel associated with these interventions.

ADD managers should also facilitate regular discussions with staff and partners on safeguarding to encourage greater understanding and awareness of safeguarding issues within their teams or partnerships and seek to continually assess and improve reporting mechanisms.

Any staff, or other individuals, who report concerns or complaints through formal whistle-blowing channels will be protected by ADD's Whistleblowing Policy.

ADD will also accept complaints and concerns reported by/from external sources such as members of the public, partners and official bodies.

## **8. Reporting Concerns**

Disclosures of harm or abuse are rare, and it is more likely you will discover someone is being harmed in other ways. Every individual who becomes aware of any suspicions or allegations regarding harm to children or vulnerable adults is required to report this immediately.

### **8.1. When to report and who to report to**

Staff members who have a complaint or concern relating to safeguarding should report it immediately *to their line manager*. If the staff member does not feel comfortable reporting to 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 of *the Safeguarding Focal Point* at country level, the designated *Lead Officer for Safeguarding* in ADD International based in the UK, or directly to the *Chief Executive, or the Trustee Focal Point* on the Board.

Partners are also expected to report concerns to the Safeguarding Focal Point at country level or directly to the designated Lead Officer for Safeguarding in ADD International based in the UK, or directly to the Chief Executive, or the Trustee Focal Point on the Board.

*Contact details for all those with specific responsibilities for safeguarding at ADD International are contained in Annex 1.*

It is mandatory for any allegation, belief or suspicion of abuse (past or present) by an ADD employee, sponsor, donor, board member, or partner to be reported immediately or within the same working day. Failure to report may result in disciplinary action under ADD's Disciplinary Policy. ADD will not tolerate malicious or frivolous complaints, and such complaints may be dealt with under ADD's Disciplinary Policy.

Where harm is suspected to have been caused by someone not connected to ADD it should still be reported in the same way. ADD International will then deal with this appropriately and pass the allegations to the relevant authority.

*Each country office will have their own reporting, referral and support systems detailed in their office, which will be based on a detailed mapping of the appropriate authorities and services available.*

In the UK, you can also choose to report concerns to the National Society for the Prevention of Cruelty to Children (NSPCC) helpline for advice on how to proceed in the UK: 0808 800 5000. Where there are concerns that a criminal offence may have been committed, or if you think a child or adult is in immediate danger, the local police should be notified without delay (please see Annex 1 for details).

ADD International's Board of Trustees have the responsibility to report serious concerns and safeguarding incidents to the Charity Commission in the UK, and any other relevant regulatory body in the UK or donors, in line with their statutory requirements.

## **9. Responding to Concerns**

ADD will ensure that action is taken to support and protect children and adults where concerns arise regarding possible abuse.

Each safeguarding report will be recorded on a Safeguarding Register and all actions and referrals recorded. The Lead Officer for Safeguarding in ADD International will keep the Chief Executive and Board of Trustees fully informed of all concerns and cases relating to safeguarding.

ADD will apply appropriate disciplinary measures to staff found in breach of policy.

ADD will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

### **9.1. Confidentiality**

Confidentiality is crucial to a fair and effective reporting procedure. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times. Records will be stored in line with ADD's Data Protection Policy.

It is unacceptable and potentially defamatory for concerns of abuse (and abusers) to be spread throughout the organisation rather than being directed through a formal complaints process. All participants must understand the importance of following the set reporting lines when concerns arise. Protection of the child or vulnerable adult who has been subject to harm must be the primary

consideration. Breaches of confidentiality may be treated as a disciplinary offence under ADD's Disciplinary Policy.

### 9.2. Reprisal

We will not tolerate any form of coercion, intimidation, reprisal or retaliation against any employee who reports any form of abuse or exploitation, provides any information or other assistance in an investigation. Any such behaviour may be treated as a disciplinary offence under ADD's Disciplinary Policy.

### 9.3. Support, communication, training and implementation for staff

Child or vulnerable adult abuse or neglect can be a difficult, emotional and disturbing subject for the staff dealing with the issue. ADD International supports staff who disclose safeguarding concerns, refer concerns or are involved when an incident occurs. It is important that you seek support after the event from the Lead Officer for Safeguarding in ADD International. Professional independent counselling is available to staff in these circumstances. In the UK this service is provided through our Employee Assistance Programme - EmployeeCare (contact 0800 917 9330).

### 9.4. Investigation of complaints

ADD International will notify relevant authorities when there are reasonable grounds for reporting abuse, particularly if the allegations are made in the UK or involve a UK citizen. Allegations made overseas will be considered in line with the national legislation and Country Office disciplinary procedures to investigate and take action.

In deciding the most appropriate course of action consideration should be taken of possible secondary harm to the victim through reporting in some contexts. Where there are concerns this should be discussed at Senior Management level, involving the Trustee Safeguarding Focal Point, and a decision taken on the balance of risk. The principle of *do no harm* should prevail when reporting to authorities. The decision should be documented, and a record kept as to the course of action decided upon.

### 9.5. Working with partner organisations

ADD staff will frequently be delivering in close partnership with Disabled People's Organisations (DPOs) and other organisations who may already be addressing safeguarding issues involving staff and individual participants. In these cases, it is important to clarify reporting processes with partners at the start of the project. All partnership agreements must include a statement confirming ADD's commitment to child and vulnerable adults safeguarding. If the partner organisation does not have appropriate safeguarding policies, then ADD's child and vulnerable adults safeguarding policy takes the precedent.

Our duty of care requires us to ensure that any disclosures or concerns are formally reported in order that appropriate action is taken to safeguard the welfare of the participant. Partners will be required to look at appropriate referral and reporting processes in their own country of operation. Simply leaving the issue with staff from partner organisations is not an adequate response to a disclosure. It is essential to make arrangements for formal reporting between the Lead Officer for Safeguarding at

ADD International and a named person at the partner organisation must be agreed. Guidance should always be sought regarding such arrangements (e.g. from the NSPCC helpline in the UK).

## **10. Monitoring and review**

ADD International's Child and Vulnerable Adults Safeguarding Policy will be monitored and evaluated to ensure this policy is rigorous both in its approach and its application by both ADD Senior Management and the Board of Trustees. The Board will also maintain oversight of safeguarding risks as detailed within the organisational Risk Register.

This policy will be reviewed by the Lead Officer for Safeguarding at ADD International every year or earlier if warranted, including after any safeguarding incident, in line with Charity Commission's guidance.

The ADD International internal audit process will be used as a tool to identify any compliance and reporting issues in country programmes as well as in the UK on annual basis.

### **Associated Policies and Guidelines;**

Code of Conduct

Anti-Bullying and Harassment policy

Whistleblowing Policy

PSEA (Protection from Sexual Exploitation and Abuse by staff) Policy

Complaints and Investigations Policy (see Grievance procedure)

Procedures for safeguarding in staff recruitment, induction and training

Guidance for visitors and media

Risk registers

Other policies as appropriate

## **Annex 1: Responsibility within ADD International for Safeguarding**

### **Lead Officer for Safeguarding:**

The Director of Finance & Operations is the designated Lead Officer for Safeguarding in ADD International.

It is their responsibility to:

- Take the overall lead for safeguarding in ADD International.
- Oversee and supporting the work of the country-level Safeguarding Champions.
- Receive information from trustees, staff, advisers and volunteers who have concerns, and register / log them and store in a secure manner in accordance with the ADD's data protection and retention policy.
- Liaise with the Trustee Safeguarding Focal Point in all matters relating the governance and management oversight of safeguarding within the organisation.
- Be the delegated liaison on behalf of ADD International for any formal investigations into allegations relating to safeguarding.
- Receive, participate and co-ordinate the appropriate child protection and vulnerable adult's protection training.
- Stay abreast of legislative and best practice developments in safeguarding policy and practice and advise on necessary developments to ADDs policy and practice.

The Programme Quality Adviser will be the Deputy Lead Focal Point Person for Safeguarding. They will support the Lead Officer on all safeguarding matters and act in their absence.

In the absence of the Lead Officer and Deputy Lead Officer, queries can also be raised directly with the Chief Executive, the designated Trustee Safeguarding Lead, or the Chair of Trustees.

### **Trustee Safeguarding Focal Point**

Trustees have a critical role to play in establishing and maintaining an effective safeguarding culture. Safeguarding is a core part of a trustee's governance responsibilities. A designated trustee acts as the key safeguarding focal point within the board.

Trustees will regularly review safeguarding processes and policies as well as oversee safeguarding incidences and disclosures as a standing agenda item at each board meeting. Furthermore, a safeguarding register will be maintained to log all historical and current safeguarding incidents

## **Country level: Safeguarding Focal Points**

Contact with children and vulnerable adults is most likely to occur in our country programmes. Each Country Programme has a named Safeguarding Focal Point.

It is the responsibility of the Safeguarding Focal Point to:

- Ensure that this policy is translated into local language(s) as appropriate, are available in child and disability friendly formats, and made aware and available to all staff.
- Ensure formal legal & political context, customs and referral and support services relating to safeguarding are mapped and understood.
- Ensure all staff members read, understand and sign-up to this policy and procedures.
- Provide advice and guidance to members of staff or volunteers who may have concerns about the abuse of a child or vulnerable adult.
- Ensure that appropriate referrals are made.
- Identify training needs (particularly ensuring new staff receive induction; all staff receive appropriate refresher training) and assist in the design, conduct and participate in staff safeguarding training.
- Disseminate safeguarding information within their country programmes.
- Receive, record and pass on disclosures and allegations received to the Lead Focal Point Person.

## **Contact Details for Key ADD International Staff with Responsibility for Safeguarding**

Contact details for staff with responsibility for Safeguarding can be found on ADD's website here: <https://add.org.uk/contact-details-staff-safeguarding-responsibility>