Introduction

Every child and vulnerable adult is potentially at risk of harm, abuse and exploitation. Family for Every Child recognises that the children and vulnerable adults with whom and for whom we work are particularly at risk to abuse, exploitation and any other harm due to discrimination and marginalisation relating to their disability, socio-economic status, gender, sexual orientation, ethnicity, caste, or living / family situation. Abuse can be perpetrated on a child or vulnerable adult of any age, and can happen to and between children. Anyone can be a perpetrator. Family for Every Child recognises both intentional and unintentional harm that may be caused through any of its work. In this context ‘intentional’ is any purposeful action inflicted on a child or a vulnerable adult with the intention to harm. Unintentional refers to any harm on a child or vulnerable adults that may have taken place by accident or mistake.

This Safeguarding Policy sets out our common belief and principles and describes the steps that will be taken by Family for Every Child to safeguard all people, especially children and vulnerable adults, from the risk of harm, abuse, exploitation and harassment that may be caused to them through any activities undertaken by Family for Every Child, both directly and indirectly.

In developing this policy we have worked with Keeping Children Safe, and referred to the work of other international organisations working within the child protection sector and safeguarding areas. Family for Every Child recognises the International Standards for child rights and human rights which provide a benchmark for agencies and organisations working with children and vulnerable adults.
Our belief

Family for Every Child believes that every child and vulnerable adult has a right to live free from abuse and exploitation.

We uphold the rights of children as defined in the United Nations Convention on the Rights of the Child (UNCRC)\(^1\) and believe 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.’

And

We uphold the rights of all people as defined in the Universal Declaration of the Human Rights proclaimed by the United Nations:

‘No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.’

Everybody has the responsibility to safeguard children and vulnerable adults from all forms of harm, abuse, abandonment, neglect, exploitation, violence and discrimination.

Our commitment

Family for Every Child is committed to safeguarding everyone from abuse, exploitation and other forms of harm and to taking necessary actions, with particular attention to children and vulnerable adults. The abuse and exploitation of children and vulnerable adults happens in all countries and in all societies across the world. Our commitment to safeguarding is to ensure an enabling and empowering environment for everyone, especially children and vulnerable adults, to participate safely through clear policies and procedures. We will ensure that this commitment is realised through all our work streams based on the principles and scope laid down in this policy.

Our principles

- Everyone has equal rights to protection from abuse and exploitation.
- Any form of harm, abuse and / or exploitation is unacceptable
- We all have a commitment and responsibility to support the care and safeguarding of everyone with whom and for whom we work
- We listen to and act on the views and opinions of children and vulnerable adults
- We address all reports of actual or alleged abuse based on our policies and procedures, irrespective of the nature of the referral, who the allegations are about, or who the referrer is or where s/he is from
- All of our actions and decisions will be guided by our organisational policies and procedures, safeguarding best practices, based on assessed risks, the ‘best interests of the child’, the principle of do no harm, non-discrimination, participation and a ‘survivor-centred approach’
- All abuse involves the abuse of human rights and all child abuse involves the abuse of children’s rights

\(^1\) UNCRC 1989
Our standards

- We implement all reasonable measures to ensure that the risks of harm to everyone’s welfare are minimised.
- We ensure where there are concerns about the welfare of individuals or groups, appropriate actions are taken to address those concerns in a timely manner.
- Our members agree to working to agreed local policies and procedures in full partnership with other local agencies.
- We ensure all individuals and organisations carrying out work on behalf of Family for Every Child are aware of their responsibilities to safeguard children and vulnerable adults and will support them with necessary information and training to be able to recognise any safeguarding risk factors.
- We ensure that safeguarding is mainstreamed in all of the activities and in all countries we work as an alliance.
- All care must be taken to ensure information regarding safeguarding concerns is treated confidentially in order to protect the identity of those concerned.
- We take our responsibilities seriously in terms of the safety and wellbeing of children and vulnerable adults, which requires us to follow the appropriate internal and external reporting and investigation processes. Information about concerns will only be shared with agencies and or individuals who need to know on a risk-assessed basis.
- Our safeguarding policy will be reviewed every 2 years to ensure it remains effective and relevant.
- This policy ensures that the safeguarding of all people, especially children and vulnerable adults is paramount in every area of Family for Every Child’s work.

Our approach

Family for Every Child has adopted policies and procedures to ensure that all of its staff, representatives and members, are knowledgeable about safeguarding risks and aware of the specific measures that they must take in order to safeguard children and vulnerable adults in the work that they do on behalf of the alliance. (These policies and procedures are included across the relevant operational areas in the organisation.)

Family for Every Child does not provide direct services to children or vulnerable adults. We support and endorse members’ organisational safeguarding policies which are appropriate to the specific country context in which they operate and the vulnerable groups of people which they support or work with. The quality of prospective members’ safeguarding policies and systems is assessed as part of the membership application process and where there are gaps, we provide support to develop them before they become full members. Member policies and practices are reviewed during the five year membership review. (Please refer to Family for Every Child Member Charter for details safeguarding commitments by members)

It is generally not the role of Family for Every Child to determine whether a child or vulnerable adult has been abused but to refer concerns of abuse to the relevant member, local authorities, local support services or external independent reporting channels, where needed. In most cases this will be in the country where the incident has been reported. Family will seek necessary support and advice from in-country experts to ensure that all safeguarding decisions are made in the best interests of the child or vulnerable adult and that no further harm is caused.

In cases where there is a safeguarding concern raised against a member, this will be dealt with within the scope of member concern management procedures (Please refer to Family for Every Child’s member concern management procedures for more information).
All information relating to safeguarding concerns will be treated with appropriate confidentiality. No retaliation or punitive action will be taken against anyone who, in good faith, raises a safeguarding concern (Please refer to Family for Every Child’s Whistle Blowing Policy and Speaking Up Framework for more information).

Family for Every Child’s safeguarding policy and procedures have been endorsed by the Board of Trustees and clarify the organisation’s stance on and commitment to protecting children and vulnerable adults.

The policy and procedures are openly available on our website and shared with other organisations or individuals that Family for Every Child works with. We aim to continuously improve our policy and procedures and ensure that staff and representatives have access to adequate and up to date training and resources. We also recognise the safeguarding resources available in our member organisations as key sources for strengthening the policies and practices of Family for Every Child and its members.

Key definitions

Family for Every Child’s safeguarding policies and procedures are in line with the UNCRC definition of a child as being anyone under the age of 18 years (unless under the law applicable to the child, majority is attained earlier). Family for Every Child acts in accordance with the UNCRC; our decisions and actions in response to child safeguarding concerns will be guided by placing the ‘best interest of the child’ at the forefront and the principle of do no harm.

For the purposes of this policy, a “vulnerable adult” is someone aged 18 or over who has care and/or support needs by reason of being affected by personal circumstances such as physical, learning or mental disability, older age, gender, sexual orientation, illness, or external circumstances such as poverty, conflicts or disaster. They are, or may be, unable to protect themselves against harm, abuse or exploitation.

Safeguarding children and young people refers to the responsibility of Family for Every Child working with / in contact with / impacting children and vulnerable adults, to take all reasonable measures to ensure that the risks of harm to children and vulnerable adults are minimised; and where there are concerns about the welfare of children and vulnerable adults, to take appropriate actions to address those concerns.

“Survivor-centred approach” in this context aims to put the rights of the person at the centre of the safeguarding concern and ensure that such a person is treated with dignity and respect. It is guided by the principles of confidentiality, safety, respect, non-discrimination, informed consent, support and prevention.

Scope

The policy and procedures shall apply equally to all individuals, Family for Every Child members and organisations carrying out work on behalf of Family for Every Child, Family Alliance Inc and Family for Every Child New Zealand Trust irrespective of location or activity.

‘Individuals’ is defined in the broadest sense of the word, for example staff, volunteers, interns, member organisations, trustees and other representatives of the organisation such as consultants, journalists and photographers commissioned on behalf of Family for Every Child who may come into contact with children and vulnerable adults or data concerning children and vulnerable adults.

‘Work’ encompasses all activities undertaken on behalf of Family for Every Child.

Our understanding of abuse, exploitation and neglect includes the below. However these definitions will be further qualified accordingly to specific country contexts where references are being made.

Physical abuse is the actual or potential physical harm from an interaction or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power, or trust. There may be single or repeated incidents (contextualised from WHO, 1999).
**Sexual abuse** is the involvement of a child or vulnerable adult in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which a child is not developmentally prepared and cannot give consent, or that violate the laws of society. Sexual abuse is evidenced by an activity between a child and an adult, or between adults or between children, one of who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to, the inducement or coercion to engage in any unlawful sexual activity; the exploitative use of a child or a vulnerable adult in prostitution or other unlawful sexual practices; the exploitative use of children and vulnerable adults in pornographic performances, internet pictures and materials (contextualised from WHO, 1999).

**Emotional abuse** includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child or the vulnerable adult can reach their full potential in the context of the society in which they live. There may also be acts toward the child or vulnerable adult that cause, or have a high probability of causing, harm to their health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, degrading, humiliating, scapegoating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment (contextualised from WHO, 1999).

**Neglect and negligent treatment** is the inattention or omission by the caregiver, to provide for the development of the child or vulnerable adult in: health, education, emotional development, nutrition, shelter and safe living conditions, in the context of resources reasonably available to the family or caretakers. In addition, which causes, or has a high probability of causing, harm to the child or vulnerable adult’s health or physical, mental, spiritual, moral or social development (contextualised from WHO, 1999).

A person may cause abuse or neglect by inflicting harm, or by failing to act to prevent harm. Children and vulnerable adults may be abused within a family or in an institution or within their own community, by a person known to them or, more rarely, by someone they don’t know.

**Sexual and commercial exploitation:** Sexual exploitation is the abuse of a position of vulnerability, differential power, or trust for sexual purposes; this includes profiting monetarily, socially or politically from the exploitation of another (for example prostitution and trafficking of children or vulnerable adults for sexual abuse and exploitation). Commercial or other exploitation of a child or vulnerable adult refers to the use of the person in work or other activities for the benefit of others. These activities are to the detriment of the child or the vulnerable adult’s physical or mental health, education, moral or social-emotional development and well being (contextualised from WHO, 1999).

**Traditional Harmful Practices:** These are practices based on cultural beliefs and values that have harmful consequences for children or vulnerable adults (e.g. early or forced marriage, female genital mutilation, honour-killing, scarring).

**Modern Slavery** includes the crimes of human trafficking, slavery, and slavery-like practices such as servitude, forced labour, forced and/or early marriage, the sale and exploitation of children and vulnerable adults, and debt bondage.

**Financial and Material Abuse** includes theft, fraud, exploitation, and pressure in connection to Wills, property, inheritance, and financial transactions, or inciting a child or vulnerable adult to do any of these things on another individual’s behalf; it may also involve the misuse or misappropriation of property, possessions, and benefits belonging to children or vulnerable adults.

**Domestic Abuse or Intimate Partner Violence** is any incident or pattern of incidents of controlling, coercive, or threatening behaviour, violence, or abuse of adults, by intimate partners, previous intimate partners, or family members regardless of gender or sexuality.

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**Bullying** is behaviour directed either against an individual or a group of individuals that creates a threatening or intimidating environment, undermining the confidence and self-esteem of the recipient(s). It could be an abuse or misuse of power that humiliates or injures the recipient(s).

**Harassment** means unwelcomed verbal, non-verbal or physical conduct, that is related to a person’s characteristics, whether they are actual or perceived, which include: age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

**Sexual harassment:** Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might cause offence or humiliation to another. Sexual harassment is particularly serious when it interferes with work, is a condition of employment, or creates an intimidating, hostile or offensive environment. Sexual harassment may be unintentional and may occur outside the workplace and/or outside working hours. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between or amongst persons of a different or same sex.

**Grooming** is the process of establishing/building a relationship with a child or vulnerable adult either in person or through the use of the Internet or other digital technologies to facilitate either online or offline sexual contact with that person.

**Coercion** means threats of any serious harm to or physical restraint against any person, psychological manipulation, document confiscation, and shame and fear-inducing threats to share information or pictures with others or report to authorities; with the intention to abuse or exploit the child or vulnerable adult.

**Online Abuse:** Online abuse happens when all the above forms of abuse are partly or entirely facilitated by technology i.e. internet or other wireless communications. It can take forms of cyberbullying, online grooming, online sexual violence and exploitation, other harm.

**Responsibilities**

Everyone at Family for Every Child or in contact with the organisation’s work is responsible for safeguarding children and vulnerable adults. Additionally there are specific roles with specific safeguarding responsibilities.

In line with the UK Charity of Commission’s [safeguarding guidance](#) the Board of Trustees is the highest body in Family for Every Child that is responsible for safeguarding all people who come into contact with the organisation. This role is represented through the Safeguarding Lead Trustee who is specifically responsible for ensuring the oversight of safeguarding in Family for Every Child. The Safeguarding Lead Trustee is responsible for regular updating on safeguarding to the board. (see Safeguarding Lead Trustee role for more information)

The responsibility for managing and reviewing this policy in relation to the work of the Secretariat lies with the CEO of Family for Every Child and the Safeguarding Officer.

The responsibility for managing and reviewing this policy in relation to activities undertaken by members on behalf of the Alliance lies with the Safeguarding Officer and the Senior Programme Advisor Lead on Member Engagement.

To support the implementation of the safeguarding policy aligned with the different workstreams of the Family for Every Child, a safeguarding team is in place. This team will be led by the SO.
Prevention

Risk Assessments

When activities which directly interact with children and vulnerable adults are carried out in Family for Every Child's name or as part of our activities, a safeguarding risk assessment is carried out to ensure that any risk of harm and welfare is minimised. In addition members implementing such activities will also comply with their own organisational Safeguarding Policy. If a member's Safeguarding Policy is not as robust as Family for Every Child's Safeguarding Policy then the latter takes precedence.

While planning any activities, risk assessments should be carried out by the respective managers, in collaboration with the respective members and the assessments should be reviewed and approved by Family for Every Child's Safeguarding Officer. In such situations, managers should use the appropriate risk assessment tool (see Annex 4) approved by Family for Every Child.

Safe recruitment, employment and engagement of individuals working with and on behalf of Family for Every Child

Safeguarding is integrated into all selection, recruitment, on-boarding and other HR processes through the full life cycle of all staff and individuals contracted by Family for Every Child. For members there is a separate due diligence process that covers all related safeguarding procedures and commitment (see members Due Diligence procedures).

A role risk assessment will be conducted for each role at the secretariat for Family for Every Child, resulting in a risk rating (low-risk; medium-risk or high-risk) for each role (see Annex 2 for the role risk assessment template). According to the assessment, the appropriate mitigation measures will be put in place which will include some or all of the following:

- All job descriptions and recruitment postings must state that Family for Every Child has zero-tolerance for abuse and exploitation of all people and that successful candidates are expected to understand and comply with the Safeguarding policy and other related policies.
- As part of the application process, any unexplained gaps in employment history are checked to eliminate the possibility of previous dismissal and/or periods in custody as a result of suspicious activity.
- Candidates selected for an interview will be sent copies of the Safeguarding Policy and Code of Conduct to read before the interview
- All interviews contain at least one question specifically relating to safeguarding issues
- All candidates offered a role will be required to provide proof of identity (passport, driver’s licence, original ID documents) at the time of appointment.
- All appointments are subject to two satisfactory references from previous employers. References from family members or friends will not be accepted.
- All referees are explicitly requested to confirm they have had no safeguarding concerns relating to the candidate in question.
- Individuals working directly with member organisations and with direct or indirect access to children or vulnerable adults (including access to data and/or visual images) are required to provide a police clearance certificate (HR will confirm which staff require police clearance certificates).
● As part of the onboarding process, all staff, trustees and consultants are required to sign a safeguarding self declaration form. (Annex 1)

● All staff, trustees and consultants sign acknowledgement that they have read and will comply with the Safeguarding Policy when starting work with Family for Every Child.

Training, awareness and support

● All new staff are given an introduction to the safeguarding policies and procedures as part of their orientation.

● Safeguarding training, including awareness raising and reporting systems, is provided to all staff on a regular basis.

● Staff and members are trained in safe use of social media tools related to activities of Family for Every Child

● All new members are required to provide a copy of their organisation’s safeguarding policies and procedures and as a condition of membership, may be offered support to make them more robust, if appropriate or commit to developing one before becoming a full member

● Member to member learning exchange on safeguarding practices from similar context is supported and facilitated to strengthen member safeguarding

Visitors to member organisations and projects

● All visitors (whether staff, trustees, other members, consultants, photographers, donors, media, interpreters, other NGOs) must be briefed before or immediately on arrival and sign the relevant member’s Safeguarding Policy and code for visitors, and where necessary agreement with Family for Every Child’s Safeguarding Policy, Code of Conduct and Visual Images Policy.

● All visitors must be accompanied at all times by staff from the member or the visiting organisation. In no case will a visitor be left alone with a child or vulnerable adult.

● No children or vulnerable adults who have participated in Family for Every Child related projects should be put in direct contact with the media or donors.

● Family for Every Child staff and representatives will not engage directly in any personal conversation with children or vulnerable adults even if a child or vulnerable adult initiates such conversation. Conversation will be limited to program-related activities and will be carried out in the presence of staff from the member organisation or the visiting organisation.

Indirect access: Visual images and written content

Family for Every Child has a duty of care to everyone, and particularly to children and vulnerable adults, who feature in all visual and written material and at all times must put their interests first. Any portrayal of children and vulnerable adults and their experiences must protect their identity, preserve their dignity and be accurate, balanced and fair. Any visual or written material will be gathered in accordance with the Visual Images Policy. (See Family for Every Child’s Communications Toolkit and Visual Images Policy for more information.)

A brief summary of the policy:

● Informed written or recorded consent (in their first language) must be obtained from parents/ legal guardians or carers and the children or vulnerable adults before taking and using photographs, film footage, audio recordings or personal histories. Such written or recorded consent can be withdrawn
at any time and a channel to do so will be provided to parents/legal guardians or carers and the children or vulnerable adults during the process of acquiring the consent.

- The visual identity of any child or vulnerable adult will be obscured if dissemination of the image could make the child or vulnerable adult open to stigma, discrimination, abuse, violence or exploitation.
- Visual images or written material will never enable the specific location of a child or vulnerable adult to be identified - either from the imagery or accompanying captions/text.
- Portrayals of children or vulnerable adults should be accurate and balanced, with emphasis upon their dignity.
- All content and other data (e.g. names, photos, locations, case studies) will be stored securely, in compliance with relevant data protection regulations, and access will be restricted only to individuals who need it.
- All content only to be used for the activity consent was provided for; and deleted once that period of consent has expired.

Social Media Guidelines

Family for Every Child recognises the importance and power of the internet and social media. But it is essential to minimise the risk of inappropriate use of information, stories and visual images (photographs, video or social media) and data of children. (see Family for Every Child Digital Policy for more details)

When using Family social media accounts:

- Images of children and vulnerable adults must be vetted to avoid accidental disclosure of identifying information of children or vulnerable adult
- Images must be vetted to avoid posting pictures that may be deemed inappropriate or abusive
- Metadata must be removed from images
- If safeguarding concerns are raised by a child or vulnerable adult over social media this must be reported to the Safeguarding Officer.
- If you observe any concern or risk situation to a child or vulnerable adult, you must report it immediately to the Safeguarding Officer
- Any social media content where images, video or written content of children or vulnerable adults is used, informed consent needs to be taken for the specific purpose and for the specific period of time for which the said content will be used.
- We recognise the limitations of control over social media and its potential reach. If consent is withdrawn, Family for Every Child will remove content from their organisational and Alliance member channels, and make reasonable requests as applicable to remove content from additional partner sites.
- Training on safe social media will be included for all social media activities

When using your personal social media account:

- Do not add children or vulnerable adults on your personal social media accounts (Facebook, Twitter, Instagram, etc.).
- Do not post photos of children or vulnerable adults that are involved in Family activities.
- Never disclose personal/identifying information of children or vulnerable in your social media pages.
- Do not post photos that show the location of activities. This may risk the security of children or vulnerable adults. Instead, share photos after the event has concluded.

**Non-compliance**

- Any safeguarding concerns relating to inappropriate conduct of Family for Every Child staff will be investigated and dealt with under the Family for Every Child Disciplinary Policy.
- Any safeguarding concerns relating to inappropriate conduct of a Family for Every Child member organisation or individual representing the member must be reported to the CEO. They will be investigated according to our procedure to manage member concerns. With appropriate confidentiality, investigations found to be upheld will result in the case being brought to the Safeguarding Lead Trustee and if necessary to the Membership Committee in accordance with the procedures for addressing member concerns (Please see procedures for managing member concerns).
- Any safeguarding concerns relating to inappropriate conduct of a Family for Every Child consultant or other non-staff representative should be reported to the Safeguarding Officer and will result in immediate suspension of the contract whilst an investigation into the claim is undertaken.
- Any safeguarding concerns relating to inappropriate conduct of a Family for Every Child trustee should be reported to the Chair of the Board. This will be dealt with according to the Procedures for dealing with Infringements of the Trustee Charter. The Chair will work with the CEO, Safeguarding Lead Trustee and the SO to respond to such concerns.
- Failure to act upon any safeguarding concern (reported or suspected) in relation to a third party (for example interpreter, photographer etc) will also be deemed to be professional misconduct that constitutes a failure on the part of Family for Every Child to protect children and vulnerable adults from real, potential or suspected harm. Any individual who is found to be concealing information brought to their attention in relation to safeguarding may be subject to disciplinary procedures.
- No punitive action will be taken against any person reporting on any safeguarding concern, unless found to be malicious upon investigation. (see Whistleblowing Policy and Speaking up Framework for more details).

**Reporting and Responding**

Family for Every Child in its commitment to safeguarding everyone and especially children and vulnerable adults strives to create an enabling environment in the organisation to make everyone feel safe to report any safeguarding concerns. All responses will be in line with the survivor-centred approach.

**Reporting mechanism for concerns and referrals**

The designated Safeguarding Officer (SO) is the first point of contact for all staff, consultants and other non-staff representatives, for reporting and referring concerns about safeguarding issues and also a resource for individuals to share concerns and discuss appropriate actions. The SO then reports to the CEO of Family who is responsible for the implementation of the safeguarding policies and procedures. The CEO and SO reports to the Safeguarding Lead Trustee of the reporting concern and its necessary follow up.
The Safeguarding Trustee Lead is responsible for updating the board of managing such concerns in line with confidentiality and privacy rights of the persons involved.

Any safeguarding concerns against the SO, need to be reported to the CEO.

Any safeguarding concerns against the CEO, need to be reported to the Safeguarding Lead Trustee.

Any safeguarding concerns against a Safeguarding Lead trustee, need to be reported to the Chair of the Board.

See Annex 3 Safeguarding Referral Form for reporting of any safeguarding concerns.

Once a concern has been reported it will be the responsibility of the Safeguarding Officer, CEO and the Safeguarding Lead trustee to determine an appropriate response. All responses to safeguarding concerns should consider the following:

- Determine the level of risk the person(s) is or may be in;
- Understand the wishes of the person(s) at risk;
- Guide relevant safeguarding staff or team in making decisions about support that can be offered to the person at risk

In order to enable reporting and response of safeguarding concerns safely the following will be ensured:

- Individuals are informed of and have access to a designated SO within the Secretariat. The SO is available to discuss concerns and dilemmas related to safeguarding and to receive any safeguarding related concerns or reports.
- Individuals have a responsibility to notify, within 24 hours, the SO of any concerns that they may have about the safety and well being of any child or vulnerable adult, or the worrying behaviour of any child or adult, irrespective of how they know the individual.
- Individuals have a responsibility to notify the SO of any general safeguarding concerns about the activities of the organisation
- No retaliation or punitive action will be taken against anyone who, in good faith, raises a safeguarding concern.
- All information in relation to safeguarding concerns will be kept appropriately confidential. Any information shared will be done so on a ‘need to know’ basis and with the knowledge of those concerned.
- Any records related to safeguarding concerns will be kept in a secure location, appropriately encrypted, with access to this strictly limited to the SO and Deputy SO.
- If a concern or report is made against a member of staff or consultant, then a note of this will be made on their confidential HR file, and will be appropriately shared by HR if a reference is sought.
- Where judged necessary, in line with the best interests of the victim, appropriate referrals will be made to the relevant member in the country where the concern has been raised. The concern will then be investigated in line with the member’s safeguarding policy and a referral made to the most relevant protection and investigating agency if appropriate. This will be done after a thorough risk assessment to mitigate any risk that can be posed to the child or vulnerable adult. The SO will coordinate closely with the member to follow up on the investigation and an updated report will be provided to the CEO and Safeguarding Lead Trustee. Where judged necessary, in countries where no member is present a referral will be made to the most relevant protection and investigating agency if appropriate. Permission will be sought from the source of the information before passing on their contact details. Details will not be passed on if it is detrimental to the interest of the child or vulnerable adult.
Dealing with disclosures

Family for Every Child will ensure that it will handle all safeguarding disclosures with sensitivity and will take alleged abuse seriously. If an individual informs you that they are being or have been abused, you are advised to:

- Reassure them that they were right to report the behaviour.
- Listen to the information being shared, but don’t press for further information, do not make assumptions or offer alternative explanations
- Ask open questions, and only enough questions to give you an idea of the facts? E.g. “Can you tell me what happened?”, “Is there anything else you want to tell me”
- Reassure the individual that they have done the right thing by telling you.
- Don’t promise secrecy. Let them know that you will need to pass on the information to another person (the SO or Deputy SO), what you will do next and that you will keep them informed of the process without breaching confidentiality.
- Do not conduct any investigations yourself or question the alleged abuser
- Ensure that the physical safety and psychological well-being of the child or vulnerable adult are secured. This may include referring them for medical treatment or to counselling services if available.
- Assess whether there is an immediate risk to the individual over the next day or two. As appropriate, take steps to immediately mitigate these risks, seeking advice from the SO
- Complete a Referral Form and pass this onto the SO immediately.
- Do not tell anyone else about the disclosure unless instructed by the SO.

Monitoring and review

It is the responsibility of the SO to monitor safeguarding concerns and wider safeguarding measures and report to the board regularly in collaboration with the board Safeguarding Lead trustee.

Safeguarding policies and procedures will be reviewed every two years by the Board or appropriate Board committee.

Safeguarding will be included in the organisational Risk Register with clear risk owner and mitigating measures in place. The Board will review this register at least annually. In addition, safeguarding will be included as a standing item on the agenda of the Board.

Complaints

The safeguarding policies have been put in place to ensure that Family for Every Child is not supporting activities or employing staff who put children or vulnerable adults at risk of abuse or any other harm. In the event of a complaint, this will be addressed in line with Family for Every Child's Complaints Policy.

Safeguarding Code of Conduct

Safeguarding is everyone's responsibility. Family for Every Child’s staff and representatives have a responsibility to safeguard children and vulnerable adults in all aspects of our work. This includes
understanding this policy and related processes and being committed to creating an environment where children and vulnerable adults feel safe and supported.

Family for Every Child and its members have a moral and legal obligation to ensure that all individuals with whom we work or have an impact upon are safe. We are committed as an alliance to upholding the highest standards of professional practice and behaviour by staff and representatives in our work and when in direct or indirect contact with all people, particularly children and vulnerable adults. Family for Every Child is committed to safeguarding such persons from abuse, exploitation and harassment and has zero tolerance towards behaviour that may harm anyone.

The Safeguarding Code of Conduct serves to prevent any harm to anyone in contact with Family for Every Child; and protect the reputation of Family for Every Child, its members and the people who work within, or on behalf of, the alliance.

All individuals connected to Family for Every Child **MUST** commit to:

- respecting and promoting the rights and dignity of every child and vulnerable adults
- Considering children and vulnerable adults as active agents in their own development with health, safety, well being and their best interests considered of paramount importance
- being aware and taking action to identify and respond to any signs of abuse, exploitation, or neglect
- Promoting a culture of openness where issues and concerns can be raised and discussed
- Challenging poor practice and recognise potential pitfalls that might lead to any safeguarding concern or harm
- Identifying and avoiding compromising and / or vulnerable situations which might lead to accusations
- Responsibly using information, photos, video, audio related to representing children and vulnerable adults through social media and other channels
- Reporting of any concerns

All individuals connected to Family for Every Child **MUST NEVER:**

- discriminate, prejudice or display oppressive behaviour or language in relation to: race, culture, age, gender, disability, religion, sexuality or political views;
- spend time alone with a child or vulnerable adult away from the vicinity of others;
- develop relationships with children or vulnerable adults, which could in any way be deemed abusive or exploitative, regardless of local laws in relation to children or vulnerable adults;
- hold, kiss, hug or touch children or vulnerable adult in an inappropriate, sexually provocative or culturally insensitive manner;
- do things of a personal nature which the child or vulnerable adult can do themselves such as toileting, bathing and dressing;
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- act in ways intended to shame, humiliate, belittle or degrade;
- condone or participate in behaviour which is illegal, unsafe or abusive;
- behave in a manner which is abusive, exploitative, inappropriate or sexually provocative;
or seek to deliberately or intentionally support or develop any initiatives which contravene the rights of children as laid out in the UN Convention of the Rights of the Child.

**Non-compliance with this Code of Conduct** will be taken seriously. In accordance with the Safeguarding Policy immediate reporting and investigation of all concerns and suspicions is mandatory and will include referral of cases to the police and/or other local authorities if the alleged matter is considered a criminal offence in the country it happened in and if it does not put the child or vulnerable adult at greater risk. (Note that a decision to not to report a possible crime based on risk to the child or vulnerable adult is a high level decision that must be confirmed by the SO, CEO and Safeguarding Lead Trustee on the Board and must be well justified and documented).

**Related Policies**
The following policies should be aligned with this policy and procedures. In the event there is a discrepancy, the higher standard will apply:
- Whistleblowing Policy
- Speaking up Framework
- Data protection policy
- Visual Images Policy
- Digital Safety Policy (including Social media policy)
- Grievance Policy
- Disciplinary Policy
- Procedures for managing member concerns
- Procedures for managing trustee concerns

**Acknowledgement**
I acknowledge that I have read and understood Family for Every Child's Safeguarding policy. I agree to adhere to the expectations and behaviour contained within.

I am clear that there is a mandatory requirement to report any concerns I have about possible exploitation, abuse or neglect and to cooperate with all investigations and follow-up.

Name: Witnessed by (Name):
Signature: Signature:
Date: Date:
Safeguarding:
Self Declaration of Criminal and Disciplinary Record

Every child and vulnerable adult is potentially at risk of abuse and exploitation. Family for Every Child recognises that the children and vulnerable adults with whom and for whom we work are particularly at risk to abuse, exploitation and any other harm due to discrimination and marginalisation relating to their disability, socio-economic status, gender, sexual orientation, ethnicity, caste, or living / family situation. Abuse can be perpetrated on a child or vulnerable adult of any age, and can happen to and between children. Anyone can be a perpetrator.

We uphold the rights of children as defined in the United Nations Convention on the Rights of the Child (UNCRC)\(^2\) and believe 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.’

We uphold the rights of all people as defined in the Universal Declaration of the Human Rights proclaimed by the United Nations: ‘No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.’

All individuals carrying out work on behalf of Family for Every Child, irrespective of location or activity, must complete and sign this declaration. This information will be held confidentially and accessed only on a ‘need to know’ basis.

‘Individuals’ is defined in the broadest sense of the word, for example employees, volunteers, interns, trustees and other representatives of the organisation such as consultants, journalists, fundraising recruiters and photographers commissioned on behalf of Family for Every Child.

‘Activities’ encompasses all activities undertaken on behalf of Family for Every Child.

<table>
<thead>
<tr>
<th>Full name:</th>
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<tbody>
<tr>
<td>Previous name(s): Please include date(s) each name was used (MM/YYYY)</td>
</tr>
<tr>
<td>Job Title:</td>
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<tr>
<td>Current address:</td>
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<tr>
<td>Address history with postcode: Please include dates from and to for each address over the last 5 years</td>
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<tr>
<td>Mobile number:</td>
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<tr>
<td>Date of Birth:</td>
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<tr>
<td>Gender:</td>
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<tr>
<td>Nationality:</td>
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</tbody>
</table>

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\(^2\) UNCRC 1989
<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>Don't know</th>
</tr>
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<tbody>
<tr>
<td><strong>Have you ever been arrested, charged, indicted, or summoned to appear in court as a defendant in a criminal proceeding?</strong></td>
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<tr>
<td><strong>Have you ever been convicted, fined, imprisoned, or otherwise sanctioned for the violation of any law (excluding minor traffic violations, such as a parking ticket or traffic infraction)?</strong></td>
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<tr>
<td><strong>Have you received any formal reprimands, final warnings, cautions or bind overs from the police?</strong></td>
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<tr>
<td><strong>If yes to any of the above, please provide details on the nature of the allegations and any subsequent disciplinary actions taken:</strong></td>
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<tr>
<td><strong>Are you currently, or have you ever: committed, been investigated, been disciplined, been criminally prosecuted, had a finding made against you, or been convicted of an offence involving any of the following:</strong></td>
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</table>

a) **Children under 18 years of age?**

b) **Vulnerable adult(s)?**

c) **Sexual abuse, sexual exploitation, or sexual harassment?**
If yes to any of the above, please provide details on the nature of the allegations and any subsequent disciplinary actions taken:

Have you ever been dismissed from employment (or voluntary activity) on the grounds of misbehaviour?

Yes  No  Don't know

If yes, please provide further information:

Have you ever been dismissed or subject to any disciplinary measure or sanction by your employer (or voluntary organisation) or had your mission or service ended or curtailed for:

a) Fraud, harassment, sexual harassment, sexual exploitation, or sexual abuse?

Yes  No  Don't know

b) An incident related to children under 18 years of age?

Yes  No  Don't know

c) An incident related to a vulnerable adult?

Yes  No  Don't know

If yes to any of the above, please provide details on the nature of the allegations and any subsequent disciplinary actions taken:
Is there any other information which may be relevant to your application to Family for Every Child e.g. pending prosecutions, on-going protection investigations in your family or disciplinary cases?

☐ Yes  ☐ No  ☐ Don’t know

If yes, please provide further information:

Declaration: Please tick each statement and sign below

☐ I agree that the information provided here may be processed in connection with recruitment purposes (for paid or voluntary work, for direct employment with Family for Every Child or through a third party) and I understand that an offer of employment/work may be withdrawn or disciplinary action may be taken if information is not disclosed by me and subsequently come to Family for Every Child’s attention.

☐ In accordance with Family for Every Child’s procedures, if required I agree to provide a valid criminal record certificate and consent to clarify any information provided on the disclosure with the agencies providing it.

☐ I agree to inform Family for Every Child within 24 hours if I am subsequently investigated by any agency or organisation in relation to concerns about my behaviour towards children, or vulnerable adults.

☐ I understand that the information contained on this form, the results of the criminal record check and information supplied by third parties may be supplied by Family for Every Child to other persons or organisations in circumstances where this is considered necessary to safeguard children, and vulnerable adults.

I confirm that information provided on this form is to the best of my knowledge correct and complete. I understand that Family for Every Child might contact an approved third-party background service and my former employers to verify the above information. I understand that any information later discovered to be incorrect may result in the termination of any contractual agreements made or any links to Family for Every Child.

Signature:

Date:
Safeguarding Role Risk Assessment

This form should be completed for all roles (staff and representatives, paid and unpaid, consultants and trustees).

- Current roles - every time a job description or person specification is changed
- New roles - before advertising a vacancy

Responsibilities for this form:
- Line Manager & HR representative should work together to complete and review this form
- Safeguarding Officer / Deputy Safeguarding Officer should do an annual audit of these forms

Definitions
- **Child**: anyone under the age of 18 years (unless under the law applicable to the child, majority is attained earlier).
- **Vulnerable adult**: someone aged 18 or over who has care and/or support needs by reason of being affected by personal circumstances such as physical, learning or mental disability, older age, gender, sexual orientation, illness, or external circumstances such as poverty, conflicts or disaster. They are, or may be, unable to protect themselves against harm, abuse or exploitation.

<table>
<thead>
<tr>
<th>Role being assessed</th>
<th>Completed by Line Manager (Name, Date)</th>
<th>Reviewed by HR Representative (Name, Date)</th>
</tr>
</thead>
</table>

**Step 1**
Using the job description and person specification for the role, answer the following questions

1. Will this role have direct (face to face) contact with children or vulnerable adults?

[ ] Yes  [ ] No  If yes, the risk is **medium**
2. Will this role have indirect contact with children or vulnerable adults through any of the following?

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<tbody>
<tr>
<td>a) Online / digital?</td>
<td></td>
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<tr>
<td>e.g. social media, Zoom, Instagram, TikTok, WhatsApp</td>
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<tr>
<td>☐ Yes</td>
<td>☐ No</td>
<td>If yes, the risk is medium</td>
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<tr>
<td>b) Access to personal data or confidential information?</td>
<td></td>
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<tr>
<td>E.g. medical records, consent forms, Safeguarding or HR fil</td>
<td></td>
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<tr>
<td>☐ Yes</td>
<td>☐ No</td>
<td>If yes, the risk is medium</td>
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<tbody>
<tr>
<td>c) Access to visuals / images?</td>
<td></td>
<td></td>
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<tr>
<td>E.g. photographs, case stories</td>
<td></td>
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<tr>
<td>☐ Yes</td>
<td>☐ No</td>
<td>If yes, the risk is medium</td>
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</table>

3. Will this role involve being alone (one to one) with children or vulnerable adults?

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<tbody>
<tr>
<td>☐ Yes</td>
<td>☐ No</td>
<td>If yes, the risk is high</td>
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</table>

4. Will this role involve control over the provision of goods / services to children or vulnerable adults? E.g. access to medical supplies, food, education

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<tbody>
<tr>
<td>☐ Yes</td>
<td>☐ No</td>
<td>If yes, the risk is high</td>
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</table>

5. Will this role involve the need for physical contact with children or vulnerable adults? E.g. washing, toileting, physiotherapy

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<tr>
<td>☐ Yes</td>
<td>☐ No</td>
<td>If yes, the risk is high</td>
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</table>

6. Will this role provide advice and support in relation to working with children and vulnerable adults and / or the promotion of safeguarding-related standards, policies and procedures?

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<tr>
<td>☐ Yes</td>
<td>☐ No</td>
<td>If yes, the risk is high</td>
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</table>
Step 2
Confirm the overall Safeguarding Risk Level based on the answers above

The overall level of risk is the ‘highest’ level that was identified above.

- If your answers are ‘No’ to ALL questions, then the risk level is ‘Low’.
- If there is a ‘Yes’ to a ‘Medium’ question and ‘No’ to ALL ‘High’ levels, the risk level is ‘Medium’.
- If there is a ‘Yes’ to at least one ‘High’ level, the risk level is ‘High’.

This role has been assessed as:

- Low
- Medium
- High

Step 3
Mitigation actions to take, depending on level of risk

<table>
<thead>
<tr>
<th>Level of risk</th>
<th>Minimum mitigations</th>
</tr>
</thead>
</table>
| Low           | ● Include safeguarding statement in candidate pack at advertising stage  
                ● Include safeguarding-related questions during the interview stage  
                ● Carry out pre-engagement checks to include proof of identity, professional  
                  references, self-declaration of criminal and disciplinary record  
                ● Safeguarding induction during the first weeks of employment  
                ● Safeguarding refresher training as appropriate |
| Medium        | As above, plus:  
                ● Either two rounds of interview with different panels, or at least two  
                  safeguarding-related questions at interview  
                ● Police background check for country of residence and countries resided in within last 5 years |
| High          | As above, plus:  
                ● Telephone check to follow up on professional references  
                ● Regular review of role-related safeguarding risks |
Safeguarding Reporting Form

For use by staff, members, representatives of Family for Every Child or individuals/organisations who are not formally connected with Family for Every Child.

All information will be treated as confidential and stored in a secure location. Please complete this form providing as much information as possible and send it to safeguarding@familyforeverychild.org. Please refer to Page 11 of this policy for guidelines for “Dealing with Disclosure”.

About you

Your name, position, organisation and email address

Your relationship to Family for Every Child

If you are reporting a disclosure from a child or vulnerable adult:

Name of the child or vulnerable adult

Sex and age

Who does the child or vulnerable adult live with?

Address /place of residence (and telephone if available):

Are you reporting your own concern or passing on those of others, give details:

Brief description of what has prompted those concerns (date, location, time of specific incidences):
**Observations made by you (physical, behavioural or indirect):**

- Have you spoken to the child or vulnerable adult? If so what was said? If possible, use the direct language of the child or vulnerable adult.

- Has anyone (or more than one person) been alleged to be the abuser? If so give details:

- Have you consulted a local authority, government department or any other agency, or reported this to anyone else? (Give details, name, organisation, date, time):

- Does the child or vulnerable adult require any medical attention?
If you are reporting a concern regarding a representative of Family for Every Child:

<table>
<thead>
<tr>
<th>Name of the individual, position, and organisation</th>
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<tbody>
<tr>
<td>Are you reporting your own concern or passing on those of others, give details</td>
</tr>
<tr>
<td>Brief description of what has prompted those concerns (date, location, time of specific incidences):</td>
</tr>
<tr>
<td>Observations made by you (physical, behavioural or indirect):</td>
</tr>
</tbody>
</table>

Name

Signature

Date

Safeguarding Policy - approved August 2023
### Risk assessment tool

<table>
<thead>
<tr>
<th>Risk no.</th>
<th>Who is at risk?</th>
<th>What factors place them at risk?</th>
<th>What is the risk?</th>
<th>What controls are in place?</th>
<th>Risk rating H,M,L</th>
<th>What additional agreed controls are to be put in place?</th>
<th>By whom?</th>
<th>By when?</th>
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<tbody>
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<td>3.</td>
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Add further lines as needed.