

## Safeguarding Policy Approved December 2018

### 1. Introduction

This safeguarding policy lays out SafeHands commitment to ensuring the safety and protection of all people - particularly children and vulnerable adults with whom the organisation engages.

This includes:

- Promoting the welfare of all – particularly children and vulnerable adults and enabling them to achieve the best outcomes
- Preventing harm through proactive measures to identify and mitigate risk
- Protecting children and vulnerable adults by responding quickly and effectively when harm or abuse is identified

This policy covers all forms of physical abuse, emotional ill-treatment, sexual abuse, neglect, commercial or other exploitation that results in actual or potential harm. This includes harm which is caused intentionally or unintentionally, directly or indirectly.

### 2. Driven by SafeHands' Values

These values underlie the work of SafeHands. We strive to bring them into every facet of our work.

- **Co-Create with women and girls:** Working with and for girls, women and their communities to share their words and stories and to create new realities with them. We are more effective, more creative and more innovative when we work together with women and girls to tell their stories and spark community-led change
- **Dynamic Action:** That is innovative, flexible and brings new ideas of doing things differently – recognising that not one size fits all.
- **Diversity of Thought and Experience:** We recognise that everyone has a story to tell and brings unique experiences which inform their work. This diversity makes us stronger.
- **Intentional Innovation and Continuous Learning:** We champion finding the right solutions to make ensure our work can reach the most under-served and overlooked communities around the world. Therefore, we strive to find the best solution.
- **Ethical Storytelling:** We aim to make the world a better place and our first step to share stories in an ethical way – that reflects kindness and professionalism in every interaction.

### 3. Scope

The policy applies to:

- All employees
- All individuals who carry out work, paid or unpaid, in the name of SafeHands
- This includes Board members, Patrons, Ambassadors, volunteers, interns, and consultants.
- All SafeHands visitors. This includes journalists, media personnel, investors, and any other individual visiting SafeHands work in any capacity. SafeHands partners who are in contact (directly or indirectly) with children or vulnerable adults are expected to have their own safeguarding policies and procedures in place. For more detail see "Safe Partnerships".

SafeHands will treat any breach of its safeguarding procedures seriously. Failure to comply with this policy may incur sanctions ranging from disciplinary action (including possible dismissal), termination of contracts or partnerships and, where appropriate, referral to the police or other relevant authorities.

## 4. Structure of the policy

This policy contains **nine** interlinked and mutually reinforcing standards which aim to ensure that SafeHands is a safe organisation. No standard can be considered in isolation and each standard must be given equal weight and importance across the organisation.

### *Definitions*

**Child:** For the purposes of this policy, a “child” is defined as anyone under the age of 18, in line with the United Nations Convention on the Rights of the Child (1989)

**Vulnerable Adult:** A person aged 18 or over whose ability to protect himself or herself from violence, abuse, neglect or exploitation, or to make informed decisions free from duress or influence are significantly impaired. 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

**Abuse and Harm:** Abuse and harm are closely related concepts. Abuse is simply harm that is so severe or persistent that it is likely to have a lasting effect on the health and development of the child or young person. Safeguarding demands attention to all types of harm (physical, sexual, emotional, neglect, or exploitation) whether these reach the threshold of significant harm or not.

**Duty of Care:** SafeHands has a legal and moral obligation to: take all reasonable steps to prevent foreseeable harm in any activity or interaction for which we are responsible; only act within our competence and not initiate operations we cannot carry out safely; and always act in the best interest of children and vulnerable adults.

**Best Interest Decisions:** Decisions that affect children should be made based on consideration of their physical and psychological well-being and the need to prevent harm to them or others. Best interest decisions should be reached in consultation with both the child/young person and those responsible for their care.

**Direct contact with children & vulnerable people:** Being in the physical presence of a child or vulnerable adult in the context of SafeHand’s work, whether the contact is occasional or regular, short or long term. Direct contact also includes interaction with children or adults via the internet or telephone, even if a physical meeting never takes place.

**Indirect contact with children & vulnerable people:** Having access to personal information (data) on children and young people in the context of SafeHand’s work such as names, locations, responses to research questions, photographs, videos, or case studies. This also includes data generated or shared by children and vulnerable people via digital applications, tools, or platforms.

**Personal Data:** Personal data is any information relating to an individual, whether it relates to his or her private, professional or public life. It can be anything from a name, photo, e-mail address, phone number, posts on social media, or responses to surveys. Data can be numerical, descriptive, or visual.

## 5. Standards

## a) *Accountability*

We will designate responsibility for safeguarding to employees across the organisation to ensure that safety measures are monitored regularly; that any new risks are identified and addressed as quickly and efficiently as possible; and to ensure that everyone within the organisation recognises their role in safe guarding.

### **Who is this standard for?**

- Board of Trustees
- All SafeHands employees particularly the Senior Leadership Team

### **Drivers Behind the Standard**

- *Organisational Responsibility* – Safeguarding children and vulnerable adults is both an organisational and individual responsibility. Trustees are ultimately responsible for ensuring the safeguarding policy is effectively implemented and that children and vulnerable adults benefiting from, or working with SafeHands are not harmed in any way through contact with its employee or consultants
- *No Place to Hide* – Abuse thrives on secrecy and abusers seek out organisations with weak communication and accountability structures. SafeHands seeks to ensure an open culture where all concerns are taken seriously, where sensitive issues are discussed without embarrassment or judgment and where risks are addressed promptly and without fear.

### **This standard is being met when...**

- There is a Designated Trustee for Safeguarding within the Board of Trustees
- There is a dedicated Designated Employee for Safeguarding. Employee and Trustees with designated responsibility for safeguarding have the skills and knowledge necessary to fulfil their role and receive regular training and support.
- The implementation and effectiveness of the safeguarding measures are reviewed annually and the Safeguarding Policy is updated based on the findings. The updated policy is approved by the Board of Trustees.
- Safeguarding performance is reported to the Board of Trustees and, if appropriate, any relevant partners' in-country on an annual basis or whenever issues arise that may affect the reputation and standing of the organisation. Gaps in safeguarding are addressed through an appropriately resourced action plan.
- An independent evaluation of safeguarding procedures is commissioned every 3 years.

### **Designated Trustee for Safeguarding**

- To act as a point of contact within the Board of Trustees for any issues relating to safeguarding
- To support the Senior Leadership Team in managing any safeguarding concerns or investigations which may affect the reputation and standing of the organisation
- To report any serious safeguarding incidents involving SafeHands employee or other representatives (paid or unpaid), to the Charity Commission in the UK or any other regulatory bodies in country as appropriate.

### **Designated Employee for Safeguarding**

- To promote awareness and monitor implementation of the safeguarding policy
- To act as a source of support and information for employee on safeguarding
- To identify training needs and provide capacity building where needed (or source external support for training/ capacity building)
- To maintain clear records of any safeguarding concerns that are reported and the actions taken to address these concerns
- To coordinate the investigation or actions taken in agreement with the Senior Leadership team and the Board of Trustees.
- To report any issues or concerns to the Senior Leadership team and Trustees

## Tools for Implementation:

- Safeguarding Self-Assessment Framework
- Terms of Reference for Designated Employee Member for Safeguarding

b) *Building the know-how to keep children and vulnerable adults safe*

SafeHands will ensure that all employee, visitors, and others undertaking work on behalf of the organisation, understand their safeguarding responsibilities and have the knowledge and skills necessary to fulfil their obligations.

## Who is this standard for?

- Designated Employee Member for Safeguarding
- All SafeHands employee, particularly the Senior Leadership Team
- All consultants and anyone undertaking work on behalf of SafeHands
- All visitors to SafeHands projects

## Drivers Behind the Standard

- Mainstreaming protection – Ensuring the safety and protection of children and vulnerable adults is everyone's responsibility, not just that of the Designated Safeguarding Lead. The Senior Leadership Team must ensure that safeguarding is embedded in their areas of responsibility and that the appropriate levels of human and other resources are in place to ensure the full implementation of the SafeHands Safeguarding Policy.
- Diverse skills but shared responsibility - SafeHands brings together professionals from diverse sectors, many of whom may have little prior knowledge or experience of safeguarding. The organisation will equip all employee, irrespective of their area of expertise, to identify risks and contribute to keeping children and vulnerable adults safe.

## This standard is being met when...

### Employee

- All employees read, sign and adhere to the SafeHands Safeguarding Policy prior to commencing work
- Compliance with the SafeHands Safeguarding Policy is a requirement in all employment contracts
- All employees receive an induction on safeguarding within the first month of work or sooner if their role requires contact with children and vulnerable adults
- Capacity building on safeguarding is provided across the organisation on an annual basis, including refresher training within 3 months of the safeguarding policy being updated.
- Employee with specific responsibilities for safeguarding receive regular specialist capacity building and have access to the resources and tools necessary to execute their responsibilities

### Visitors

- Expectations regarding safeguarding are explained in a briefing prior to any visit to projects or partners which involves (direct or indirect) contact with children or vulnerable adults
- All visitors sign a 'Visitor Agreement Letter' in which they agree to comply with the SafeHands' Code of Conduct and reporting procedures
- All visitors must demonstrate an Enhanced DBS check prior to undertaking the visit
- Visitors know who to contact in the event of any concerns and are provided with contact details for the Safeguarding Lead
- Visitors are accompanied by SafeHands' employee whenever in direct contact with children

### Consultants

- Consultants read and sign a commitment to adhere to the 'Safeguarding Policy' included in all consultancy agreements
- Expectations regarding safeguarding are explained in a briefing prior to undertaking assignments which involve (direct or indirect) contact with children or vulnerable adults

- Contracts for consultants include a clause requiring compliance with SafeHands' Safeguarding Policy and the consequences of a breach.
- SafeHands completes background checks on consultants working directly with communities. For more detail see "Safe Recruitment"

#### **Tools for Implementation:**

- Safeguarding Induction (Employee) PPT Deck for new employee
- Safeguarding Briefing (Visitors & Consultants) PPT Deck
- Visitors Agreement Letter including: Summary for External Visitors and Consultants
- Consultancy contracts include clause on safeguarding

#### *c) Safe Recruitment*

SafeHands will ensure that its recruitment process minimises the risk of engaging any individual who is unsuitable to work with children and vulnerable adults.

#### **Who is this standard for?**

- SafeHands employees
- SafeHands Senior Leadership Team
- Any employee responsible for recruiting employee or consultants.

#### **Drivers Behind the Standard**

- Professional conduct, personal values - We seek to recruit employee who are committed to the highest standard of personal and professional conduct. This goes beyond simply complying with protocols, but extends to ensuring that individuals have an appropriate set of personal and professional values and are committed to promoting the safety and well-being of people.
- Recognition of risk – SafeHands recognises that some individuals may target organisations in order to gain access and abuse or exploit children or others. Screening is crucial to mitigating this risk.

#### **This standard is being met when...**

##### **Employees**

- All Job Descriptions are categorised as requiring either Foundation or Enhanced level checks. This will vary depending on:
  - The level of direct contact with communities – including children and vulnerable adults
  - The level of indirect contact through access to personal data on children and vulnerable adults
  - The level of responsibility for the design or management of initiatives that engage children or vulnerable adults (both directly or indirectly).
- The level of background checks undertaken corresponds to the categorization for the post-holder. Where specific checks have not been obtained, there is a documented rationale with appropriate authorisation from the Designated Trustee for Safeguarding.
- Reference checks are clearly documented and available on all personnel files
- Disclosure and Barring Service (DBS) checks are completed for all UK nationals or UK residents whose role requires Enhanced Level checks.
- DBS checks are renewed every 3 years

**Consultants:** For all consultants whose work involves direct or indirect with communities including children and vulnerable adults:

- A DBS check obtained in the past 3 years must be produced. If one is not in place, SafeHands will ensure a DBS is completed prior to any contact with children or vulnerable adults. Where such checks are not available (e.g. where the associate is not a UK national or a UK resident), SafeHands reserves the right to call referees to seek further information about the candidate's practice in relation to children

- All consultants must provide SafeHands with two independent referees which are verified by telephone or email. Referees cannot be family members and must have known the candidate for longer than 3 years and preferably one to have been their direct line manager.

## Foundation Level Checks

### Who?

All employee, even where the post is unlikely to involve either direct or indirect contact with children and vulnerable people.

### Checks:

- A candidate specification accompanies each job description to help ensure that only people with suitable knowledge and skills are recruited for the post
- Candidates complete a full application form and must explain gaps in their employment history.
- Two references are obtained from previous employers to check the candidate's suitability for the post. References should include the last employer – preferably a recent line manager of the candidate. At least one referees must have known the candidate for 3 years and they cannot be family members.
- Employee with Foundation Level checks may, on occasion, visit SafeHands events where they are in direct contact with children and vulnerable adults. On these occasions, they will always be accompanied by employee with enhanced level checks.

## Enhanced Level Checks

### Who?

All employee that may have direct or indirect contact with children and vulnerable adults; indirect contact through access to children or vulnerable adults' personal data; and/or responsibility for the design or management of initiatives which directly engage children and young people.

In addition to the Foundation Level Checks:

- For UK nationals or UK based residents, a DBS check is completed. DBS checks are renewed every 3 years.
- As DBS checks may only be completed for UK nationals or UK residents, alternative checks will be used for non-UK nationals and residents as is possible. Where such checks are not available, SafeHands reserves the right to call referees to seek further information in relation to the candidate's practice in relation to children and vulnerable adults.
- Employment referees will be informed that the candidate will have access to children and vulnerable adults and will be asked about the candidate's suitability to work with these groups
- Where employee (e.g. Safeguarding lead) have job specific safeguarding responsibilities, the interview includes specific questions designed to bring out their level of skills and experience in this area.

### Tools for Implementation:

- Reference Request Form (Enhanced / Foundation Level)
- Interview questions to assess safeguarding knowledge or suitability

#### d) *Safe Partnerships*

SafeHands will ensure that all partners have the appropriate safeguarding policies and procedures in place to prevent harm to children and vulnerable adults and to respond effectively when safeguarding concerns are identified.

### Who is this standard for?

- All employees with responsibility for the implementation of SafeHands films, projects, research, and events
- All employee who work with partners in the delivery of our work

The Board of Trustees is legally accountable for ensuring that the organisation's funds are used properly and for ensuring that due diligence checks are conducted to identify and verify who partners

are, and assure they have the capacity and skills to deliver initiatives. This responsibility is delegated to the Directors for each initiative.

## **Types of Partnerships in SafeHands**

- *Financial or Donor Partners:* Organisations or individuals who invest or co-invest (either financially or through in-kind donations) in SafeHands initiatives but have no or limited direct contact with our employee, operations, or children and vulnerable adults.
- *Portfolio Partners:* Organisations or individuals who invest or co-invest (either financially or through in-kind donations) in SafeHands and work in collaboration with SafeHands in ensuring delivery on the ground. This may include both direct and indirect contact with children and young people through the co-design and delivery of initiatives. The level of responsibility will vary depending on whether SafeHands or the partner is the lead implementor.
- *Design & Content Partners:* Organisations or individuals who support the creation of content for SafeHands films and campaigns. This may include direct contact with children and vulnerable adults or an indirect impact on children and vulnerable adults through the materials that are produced.
- *Implementing Partners:* Organisations or individuals responsible for implementing or co-implementing SafeHands initiatives, who have either direct or indirect contact with children and vulnerable people. The level of responsibility will vary depending on whether SafeHands or the partner is the lead implementor. For example, SafeHands may curate a film but other agencies will be responsible for facilitating other activities with children and vulnerable people within the communities before, after, or during the filming process.

## **This standard is being met when:**

### **Financial / donors Partners**

- Prior to confirming any partnership, Senior Leadership Team discuss the ethical implications of the partnership. Partnerships are not approved with individuals or organisations whose investments or operations (both past and present) expose children and vulnerable people to abuse or exploitation.

### **Portfolio Partners; Design & Content Partners**

- Prior to confirming any partnership, Senior Leadership Team discusses the ethical implications of the partnership. Partnerships are not approved with individuals or organisations whose investments or operations (both past and present) expose children and vulnerable people to abuse or exploitation.
- Where data on children and young people is shared between SafeHands and the partner, a written Data Sharing Agreement is developed which covers data privacy and security, data ownership, consent for use and re-use of data, sharing and destruction of data
- Where representatives of the partner organisation visit SafeHands filming locations, they are provided with a briefing which includes expectations in regards to safeguarding. All visitors sign a 'Visitor Agreement Letter' in which they agree to comply with the SafeHands Code of Conduct and reporting procedures

### **Implementing Partners (where SafeHands is lead agency)**

Note where SafeHands is a sub-grantee partner, or consortium member, the lead agency safeguarding policies will have precedence.

- Due diligence checks include a review of the policies, procedures, and processes that are in place to safeguard children and vulnerable people.
- Partners receive a Safeguarding briefing which includes detailed information of SafeHands' minimum requirements for safeguarding.
- A written Safeguarding Agreement is compiled with details of the policies and procedures that must be followed in order to comply with SafeHands minimum requirements. The agreement is signed by the Director of the partner organisation who is responsible for ensuring its implementation.

- Where data on children and vulnerable people is shared between SafeHands and the partner, a written Data Sharing Agreement is developed which covers data privacy and security, data ownership, consent for use and re-use of data, sharing and destruction of data
- Where necessary, SafeHands provides additional capacity building to ensure the safe practice of partners

### **Complex Partnerships**

- On many occasions, organisations may straddle several different types of partnerships. Where this happens, the category with the highest level of checks will be applied

### **Tools for Implementation:**

- Due Diligence Checklist
- Partnership Safeguarding Briefing PPT Deck
- Partnership Safeguarding Agreement
- Data Sharing Agreement

### e) *Code of Conduct*

SafeHands will ensure that all employees, consultants, visitors, and anyone undertaking work on behalf of the organisation comply with the Code of Conduct when interacting (directly or indirectly) with children and vulnerable adults.

### **Who is this standard for?**

- All SafeHands employee and Board members, volunteers or interns
- All consultants and anyone undertaking work on behalf of SafeHands
- All visitors to SafeHands projects

### **Drivers Behind the Standard**

- Organisational Reputation – Our actions and behaviours can be misinterpreted, no matter how well-intentioned. Allegations of misconduct, whether founded or unfounded, can destroy the organisation's reputation. Following this code, helps protect the organisation and individuals from accusations of improper conduct.
- Duty to Act – Minor breaches of this code should be challenged directly where possible or appropriate, or the issue should be raised with the individual's direct line manager. Any breach, which places a child or vulnerable adult at risk of harm or where there is a suspicion of abuse, must be reported in line with SafeHands reporting and response procedures. Failure to act will be considered a breach of the Safeguarding Policy.

### **This standard is being met when...**

- All employees have read and signed a copy of the Code of Conduct and know when and how to report breaches of the Code of Conduct
- All consultants have read and signed commitment to 'SafeHands Safeguarding Policy' which includes the Code of Conduct
- All visitors sign a Visitors Agreement which includes the Code of Conduct
- All partners working directly with children & vulnerable adults sign a Safeguarding Agreement which includes the Code of Conduct
- Children, along with their parents or caregivers, and vulnerable adults (and any appropriate caregivers) know when and how to report breaches of the Code of Conduct
- Codes and reporting processes are easily and readily available to partners and communities where SafeHands is working, especially during filming.

### **Tools for Implementation:**

- Flowchart on reporting Guidelines
- Social Media Guidelines

Other general comments:

### **General Professional conduct guidelines**

- Be polite, considerate, and an example of the good conduct that you wish others to follow;



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- Never use language or behaviour that discriminates on the grounds of gender, race, culture, age, disability, religion, or sexuality;
- Never engage in any activity that could bring the organisation in to disrepute. SafeHands does not seek to dictate the values by which you conduct your personal life, but actions taken outside of working hours that contradict this policy will be considered a violation and may be investigated.
- Challenge unacceptable behaviour and report concerns immediately

## **Preparation for Visits to other countries for filming**

- Attempt to understand the local culture and religious norms, particularly those related to contact between children and adults.
- Ensure you take clothing that is appropriate to the local culture and religion
- Discuss contact with children and vulnerable adults with local employee or contacts in advance to identify and minimise any potential risks

## **Interactions with Children and Vulnerable Adults**

- Always ensure that children and adults know who you are and why you are visiting
- Always ask permission before taking photographs or videos and ensure that you have the proper consent for further usage.
- Always treat children and adults with respect and never act in a way which could shame, humiliate, or degrade
- Never show favouritism or spend excessive time with one child or young person or vulnerable adult
- As your presence is temporary, you should avoid developing close emotional ties with any one individual
- Avoid offering money or gifts to individuals or their family – where gifts are given, they are should only be given to groups of children or adults and should be minimal value
- Avoid being alone with children or vulnerable adults or in any situation which could be misinterpreted
- Never take a child or vulnerable adult in your car, to your hotel, or any other private spaces
- Never share personal details about yourself (your hotel, home address, or contact details) or agree to connect with children or vulnerable adult on social media

## **Physical contact with Children and Vulnerable Adults**

- Always wait for the child or adult to initiate any type of physical contact – remember your presence may be unsettling and any attempt to initiate physical contact may be misinterpreted
- Never hit or physically chastise a child or vulnerable adult (including using physical restraint to contain behaviour)
- Never give assistance in aspects of personal care (e.g. dressing, bathing etc)
- Never engage in or allow sexually provocative games or behave in a manner which might be consider inappropriate or sexually provocative
- Never sleep in the same room or bed as a child or vulnerable adult with whom you are working
- Never develop physical or sexual relationships with children, vulnerable adults, or any beneficiaries

## **Use of Social Media**

- Never direct post images or stories about children or vulnerable adults, or beneficiaries who are engaged with SafeHands on your personal social media accounts. Consent is given to SafeHands as an organisation and not to the individual for personal use.
- Never accept contact requests or engage children or vulnerable adults whom you have met through SafeHands via personal social media
- Always think twice about what you post or share and what implications this may have for SafeHands
- Never upload or post any racist, defamatory, obscene, or abusive content

## f) *Safe marketing and communications*

SafeHands will take every precaution to preserve the privacy and dignity of all beneficiaries and ensure they are not exposed to risk as a result of their involvement in SafeHands' publicity activities, communication materials or campaigns.

### **Who is this standard for?**

- SafeHands employees, consultants, and anyone producing content and media for SafeHands
- SafeHands employees, consultants, and anyone facilitating activities with children and vulnerable adults
- Visitors to SafeHands projects

### **Drivers Behind this Standard**

- **Best interest of the child** - The public use of images and stories of children and young people inevitably poses potential risks. Where there is a risk of negative consequences for children and vulnerable people, SafeHands will make decisions which favour the safety and protection of children and, where necessary, vulnerable adults.
- **Dignity** - In all communications, SafeHands will seek to uphold the rights and dignity of the child or young person, their family, and the wider community. We will not use language and images that stereotype, degrade, victimise, or shame children, and young people, and beneficiaries.
- **Privacy** – SafeHands upholds every person's right to privacy. Anyone participating in SafeHands work will never feel pressure to share information, which they are not comfortable discussing. Any information shared with SafeHands will be handled with the utmost care and SafeHands will ensure that we never share information which could put a beneficiary at risk.
- **Accuracy** - The organisation's portrayal of individuals or groups must not be manipulated or sensationalised in any way, but instead should provide a balanced depiction of their life and circumstances. SafeHands will avoid taking or using pictures or stories out of context. After 5 years, photos and case studies will be reviewed to consider the continued use of those images and content and may be archived, to maintain an accurate portrayal of our work.

### **This standard is being met when...**

#### **Content**

- The maximum information given publicly about a child/vulnerable adult should be their first name and the name of the district in which they live. Information or images that could be used to identify someone's specific location (such as village or community names, school, parish, etc.) should not be used.
- When producing case studies, it may be important to disclose the person's full name and other details to maintain the full impact of the story. In these circumstances, the case study is revised by the Safeguarding Lead point to assess potential risks prior to publication. If publication puts the person at risk of harm and it is not possible to mitigate these risks, the story will not be published.
- Where children or people are survivors of violence or human rights violations, we will consider whether faces are not displayed and no information is shared which could lead to their identification. Content will clearly stipulate 'the names and locations have been changed for protection and privacy purposes'.
- All content, publications, and presentations featuring children or vulnerable adults are reviewed to ensure no child or vulnerable adult is put at risk. Content is reviewed by employee with appropriate levels of knowledge and experience in relation to safeguarding. Where doubts exist, content decisions should be discussed with the Designated Employee for Safeguarding.
- Images will not be used that could be considered sexually provocative or where children and young people are not fully clothed.

#### **Consent**

- Informed consent for photographs, video, audio or personal information must be obtained from the any adults or child and, where the child is under 18, from their parent or guardian. Consent may be obtained through a signature on a consent form, video/audio recorded consent, or through digital confirmation of consent. In all circumstances, consent must demonstrate that the child/vulnerable adult understands:
  - How their photo/information will be used, for how long, and by whom
  - Who will see it
  - How their privacy will be upheld
  - That their consent is voluntary and they have the right to decline
- Consent for use of images or stories is distinct from other forms of consent (e.g. consent to participate in activities, research). Specific consent forms must be used. Consent for other purposes cannot be considered as consent for media and communications.
- Pictures taken for personal use may not be shared on personal social media or in any publications or presentations. Consent is provided to SafeHands and not to any individual
- Individuals or organisations that request the use of SafeHands' creative assets, such as photographs, will be required to sign a lending agreement with SafeHands' as to the proper use of such materials.
- Consent documentation is stored alongside the data, stories, photos or other digital assets. Images and stories are held securely and access restricted to the minimum number of people who necessary.
- Consent is provided for use of images and stories over a 5 year period after which the images/stories are archived

### **Person's Voice**

- Children and adults are enabled to give their own accounts and personal narratives, rather than have people speak on their behalf. When using content created by children and vulnerable people, SafeHands shares media ownership with them as long as it does not place them at risk.
- Any online discussions are moderated to maximise safety and privacy and minimise risks

### **Tools for Implementation:**

- Consent forms for media and communications
- Scripts for obtaining consent through video, audio or online
- SafeHands Photo/Resource Release and Lending Form
- Guidelines on obtaining consent & publishing images of children & vulnerable adults

### *g) Digital privacy, security and safety*

SafeHands will ensure that its digital applications, platforms and services are safe, secure and do not result in inappropriate or unethical capture and/or use of data on children and vulnerable adults.

### **Who is this standard for?**

- SafeHands employee, partners, consultants, and contractors responsible for developing or managing digital applications, platforms or services
- SafeHands employee, partners, consultants and contractors who collect, use, analyse, or otherwise have access to digital data or content belonging to, or about beneficiaries.

### **Drivers Behind this Standard**

- 'Do No Harm' - Data collected about or from children or vulnerable adults will be used in ways that respect their privacy and minimizes the risk of harm. SafeHands will consider the most vulnerable girls and women as the baseline for determining privacy, safety, and security policies and practices. In cases where the risk to the user is unclear, SafeHands will err on the side of risk prevention and mitigation.
- Data Minimisation - Only data that is directly relevant and necessary to accomplish SafeHands' stated purposes will be collected from children and vulnerable adults.
- Privacy by Design - ensuring privacy is our default setting when designing digital applications, services, or platforms.

## **This standard is being met when...**

### **Security and Safety**

- A risk assessment is completed prior to launching any product that has a digital component. Where high risks are identified, activities do not proceed until a risk mitigation strategy is developed that reduces the risk to a medium or low level. The risk assessment is approved by the Safeguarding Lead.
- Child friendly Terms and Conditions (T&Cs) exist for all SafeHands digital applications, services or platforms. Acceptance is captured in such a way that it is not the default position.
- All website and platforms where children and vulnerable adults are commenting or sharing information, photos and stories are moderated by employee with appropriate levels of knowledge and experience in relation to safeguarding. Site moderators address inappropriate content in line with the Child Friendly Community Guidelines. Where concerns of harm or abuse are identified, the SafeHands reporting procedures are followed.
- Procedures for reporting and responding to harm or abuse exist for each digital platform or product. These take in to account local laws, cultural norms, and the availability of protection services.

### **Ethical access to and use of children and vulnerable adults' data.**

- A mapping is conducted and summarises the national and global laws, guidelines and regulations that govern data collection, data privacy, security, and transmission. When SafeHands' own policies are stronger and more favourable to children and young people, SafeHands' policies will be upheld in addition to national and global laws and regulations.
- The summary of legislation and regulations is reviewed annually or whenever there are major changes to regulations or to SafeHands processes or technology. It is the responsibility of the Founder Director for the initiative to ensure that SafeHands is aware and complies with data laws.
- Users of digital platforms must be given the opportunity to agree to a specified use of their personal information and this is not assumed based on consent for other activities (e.g. participation, media consent). Active consent must be captured in a way so that consent is not the default option. Consent documentation is stored alongside the data, stories, photos or other digital assets.

### **Securely collect, use, transmit, manage and store data by ensuring that:**

- Digital/electronic information is password protected, and hard copies filed in lockable storage.
- Data is only stored or hosted using cloud-based services that meet the highest industry security standards, including restricted, password protected access and encryption.
- Authorised access is only given to employee that require the data in order to perform their duties. Unauthorised access is considered a breach of the Safeguarding Policy, is investigated immediately and appropriate action taken
- Children and vulnerable adults' data is only transferred by authorised means, e.g. VPN, SSL etc. Data is de-identified or anonymised and encrypted before transmission.
- A written agreement is in place to control and authorise the release of information on children (data, images) to partner organisations, the Internet, the public domain, or any third party. The sign-off includes a written assessment of the need/benefit of sharing information and is balanced against potential risks.
- Copyright and ownership issues for digital data, photos, stories, and other digital assets are clearly defined and explained both to those collecting data and those providing it during contracting and/or at the point of requesting informed consent.
- Hard copies of confidential and sensitive individual data are disposed of or destroyed in a secure manner, e.g. through an appropriate supplier and in line with country legislation.
- Loss of data on children and vulnerable adults (e.g. lost laptops, pen drives, etc.) is immediately reported to the local Safeguarding Lead

### **Tools for Implementation:**

- Digital Privacy, Security, Safety Principles & Guidelines
- Digital Risk Assessment & Checklist
- Child friendly Terms and Conditions (T&Cs)

- Digital Mapping Tool: national and global laws, guidelines and regulations
  - Data Sharing Agreement
  - Scripts & process guide for obtaining consent online

## h) *Reporting and response procedures*

SafeHands will ensure that all safeguarding concerns are reported through a clear reporting structure and responded to in a timely fashion in a way that protects the best interests of children and vulnerable adults.

### **Who is this standard for?**

- All SafeHands employees, consultants, partners, Board members, and visitors.

### **Drivers Behind this Standard**

- **Mandatory Internal Reporting** - It is the responsibility of all employee and partners to take seriously any concerns, complaints, allegations, suspicions and incidents involving children and vulnerable adults. Reporting these concerns to the Designated Employee for Safeguarding is a mandatory requirement in SafeHands. Failure to report will be considered a serious breach of SafeHands' Safeguarding Policy.
- **Equal right to protection** – Mandatory reporting relates to harm caused to any child or vulnerable adult regardless of their relationship with SafeHands and irrespective of age, religion, gender, race, or socio-economic status, ability
  - Concerns about harm or abuse must be internally reported where:
    - The alleged perpetrator is a SafeHands employee, visitor, associate, or a member of employee of a partner organisation;
    - The alleged perpetrator is a member of the child's family, community, or is unknown to the child;
    - The alleged perpetrator is also a child, although responses should take in to account the protection and safety of both the child victim and the alleged child abuser;
    - The abuse is historical. Most abuse is not disclosed until many years after it has occurred but the risks of harm to children may persist and require investigation;
    - The report is anonymous as this does not automatically mean that it bears less substance but may indicate fear of reprisal, shame, or other barriers to disclosure. Anonymous reports should be taken as seriously as 'named' reports although the extent to which they can be investigated may be limited by the anonymity.
- **Duty of Care** – SafeHands has a legal and moral obligation to respond to cases of harm and abuse when these are identified through our engagement with children and young people. We must not, however, initiate interventions or offer advice that requires specialist child protection expertise as this is outside our area of competence and could inadvertently result in further harm to the child. When cases of abuse are identified, SafeHands' duty of care encompasses:
  - Listening and providing re-assurance to the child
  - Helping the child to share their concerns with a trusted adult who can help them decide what further action to take (e.g. parent/care-giver)
  - Providing details of recognised, child-friendly agencies who can provide protection (e.g. police) or additional advice and support (e.g. recognised telephone helpline, a local child protection agency)
  - Ensuring concerns relating to SafeHands employee, consultants, partners, or visitors are fully investigated and action taken
- **Organisational Responsibility** – the responsibility for decisions and actions rests with SafeHands as an organisation and not with any individual. Employee and any other representatives of SafeHands must not act in isolation but must consult with SafeHands designated Safeguarding Lead before taking any action in response to child protection concerns.

### **You will know when you are meeting this standard when:**

- A mapping of the local child protection context is undertaken prior to entering a new project agreement and is updated annually. The mapping is signed off by the Lead for Safeguarding.
- Within each project, the mapping identifies, as a minimum:

- An emergency number that children and vulnerable adult can contact if they are at immediate risk of harm.
- An agency that children and vulnerable adult can contact to discuss safety concerns and seek advice about next steps (e.g. a recognised and approved telephone helpline service)
- A child protection agency that can assess cases and provide follow up support and advice to children and their families
- Children and vulnerable adults are provided with information about who they contact when they have any concerns or they feel unsafe. This includes child friendly information on the limits of confidentiality and the duty to report
- Details of concerns are treated with the highest degree of confidentiality and only shared with the minimum number of people necessary to ensure the safety of the child. Access to records are limited to the Lead for Safeguarding and the Board Lead for Safeguarding. Access by other individuals requires permission from the Lead for Safeguarding.
- A central register of all child/safeguarding protection incidents is maintained. The data is anonymized but is analysed regularly by the Lead for Safeguarding and the Safeguarding Trustee to evaluate the effectiveness of response, identify gaps in resources and knowledge and develop methods to improve practice

## 6. Reporting & Response Procedure

Trustees, employees, volunteers and interns should follow the following procedure when considered about safeguarding.

*You observe or receive a report of harm/abuse to a child or adult*

- Listen and confirm facts
- Where possible speak to the child or adult and confirm what they want to happen
- Report concern to the Safeguarding Lead (Immediately)
- Additional steps when the allegation refers to SafeHands employees, partners or other representatives
- Inform the Founder Director and Designated Trustee for Safeguarding

*Key Decisions Taken:*

- How to ensure the adult's/child's safety
- Whether to report to police / authorities
- Who to inform from child's support network (if relevant)

*Contacting necessary authorities*

- Founder Director contacts individual who may be suspended pending investigation
- Nominated Trustee informs the Charity Commission
- Will the case be investigated by local authorities / police?
- Child & their trusted adult or vulnerable adult are provided with information about relevant services
- SafeHands cooperates with investigation
- Internal Investigation conducted

*Within 48 hrs*

- Designated Trustee for Safeguarding maintains a record of all subsequent actions
- Cause for Concern form is completed by the person receiving the report & shared with the Designated Trustee for Safeguarding

- UK LADO informed in UK Children's Services

## Reporting & Response Procedure

Listen carefully and calmly to the allegations and ask questions to clarify the allegation. Confirm what steps (if any) have already been taken to ensure the safety of the child/vulnerable adult. Remember, your role is to clarify facts NOT to conduct an investigation.

Where the report comes directly from a child or young person, ask them what they feel would help keep them safe, what they would like to happen next and try to identify a trusted adult in their lives who can be contacted to support them and help to keep them safe.

NEVER promise to keep secrets. Internal reporting is mandatory within SafeHands and the concern may have to be reported to other agencies as well. You can tell the child /adult that you will only tell people who need to know in order to keep them safe and that you will discuss with them the best way to share information (e.g. who they would like to be told, whether they want to tell the person themselves etc.).

Before taking any further action, you must immediately contact the Designated Employee for Safeguarding or Founder Director to discuss next steps

In deciding how to respond, the following questions need to be considered:

- How can the immediate safety and well-being of the child be ensured? Who is best placed to provide protection?
- Is a criminal act suspected? Does this need to be reported to the police or other authorities?
- Who else needs to be informed to support & protect the child (e.g. parent/ caregiver, other trusted adult)?  
For further information, please refer the 'Guidance on Managing Disclosures and Making Best Interest Decisions'

It is important to remember that SafeHands is not a child protection agency and cannot provide the support and services a child may need following an incident of abuse. In collaboration with the child, it is important to identify a safe and trusted adult from within the child's family or wider support network who can provide support.

Decisions about referrals to wider agencies (e.g. for counselling, psycho-social support) should be led by the child and the trusted adult they identify, not SafeHands. SafeHands will, however, provide details of support services that have been vetted as child-friendly by either SafeHands, our consultants, partners or a recognised child protection agencies (e.g. UNICEF, Save the Children). This is also the case for adults where the adults MUST decide the next steps they wish to take – including whether they want to report to police or other authorities.

## Reports made through media or digital channels

If it is not possible to discuss the allegation with the person concerned, providing specific advice without sufficient understanding of the adult's or child's individual situation may place the adult or child at additional risk.

Responses should be limited to:

- Acknowledging the adult or child for taking an important step towards disclosing harm or abuse (Voice)
- Re-affirming the adult's or child's right to protection (Value)
- Encouraging the adult or child to share their concerns with a trusted adult (Connection)

- Providing details of support services that have been vetted as child-friendly by either SafeHands, our consultants, partners, or recognised child protection agencies (e.g. UNICEF, Save the Children) or as appropriate support for vulnerable adults (Connection)

Even where a report of abuse is made through media or digital channels and it is possible to communicate with the person concerned (e.g. IVR), advice should only be given by suitably qualified and experienced safeguarding specialist. If the person receiving the report is not a specialist, they should provide the generic safeguarding response detailed above.

All concerns and response provided should be recorded and the Designated Employee for Safeguarding within 24 hours.

### Allegations Against Employees

If the alleged perpetrator is a SafeHands employees, a consultant, visitor, or a representative of a partner organisation the Founder Director must be informed in addition to the Designated Trustee for Safeguarding

The Founder Director must inform the Board Safeguarding focal point to seek advice regarding next steps and to decide whether the individual should be suspended from duties pending an investigation. Suspension is not a presumption of guilt but is to protect both the individual and anyone associated with the allegation.

In most cases, the Founder Director will contact the individual concerned to provide a brief outline of the allegations (except where this may expose the child to further risk) and give them an opportunity to respond. If the individual is suspended from duties, they will be prohibited from contacting other SafeHands employee or accessing the SafeHands drive. The Founder Director will act as the main point of contact until the investigation is completed.

Where the individual is a UK national or UK resident, the matter must also be reported to the Local Authority Designated Officer (LADO) in the area where the individual lives in the UK. This is in addition to any official reporting in-country. The LADO will advise whether Children's Services or the police will take further action and whether a UK investigation is required. They will also provide advice regarding referrals to the Disclosure & Barring Service (DBS).

- Any allegation of harm or abuse caused by an employee, anyone representing SafeHands or arising as a direct result of SafeHands operations, must be reported to the Charity Commission in the UK. This report must be submitted irrespective of where the incident took place. This report should be submitted by the Nominated Board Member for Safeguarding or SafeHands' Founder Director

### The Charity Commission must be informed of:

- Any incident where the beneficiaries of your charity have been or are being abused or mistreated while under the care of your charity or by someone connected with your charity such as a trustee, member of employee, or volunteers
- Any incident where someone has been abused or mistreated and this is connected with the activities of the charity
- Any allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place Where there are grounds to suspect that such an incident may have occurred

For more details see the Charity Commission (2013) Strategy for Dealing with Safeguarding Vulnerable Groups including Children Issues in Charities. Available at: [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/471896/safeguarding\\_strategy.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471896/safeguarding_strategy.pdf)



## 7. Investigation

In most circumstances, SafeHands will only pursue an investigation in cases relating to employee, partners, or other representatives of SafeHands. Wherever possible, the decision to pursue investigations by perpetrators unconnected to SafeHands will rest with the child and their family.

Where allegations against SafeHands employee, partners, or other representatives of SafeHands are reported to the police or other statutory authorities, these agencies should lead the investigation. SafeHands will cooperate with any investigation that is undertaken.

In countries where there is doubt about the integrity and/or competence of statutory authorities and/or reporting may lead to reprisal or re-victimisation for the child or their family, all potential risks should be assessed before any actions are taken. Any decision must take in to account the legal obligations as failure to report may, in some countries, constitute a legal offence. Any decision not to report cases to the relevant local authorities must be documented and authorised by the Founder Director and the Lead for Safeguarding.

In circumstances where the incident is not reported to the police or other statutory authorities or where they decline to investigate the matter, SafeHands should conduct its own investigation. Any decision to undertake an internal investigation must be made by the SafeHands Director, in discussion with the Designated Employee for Safeguarding and the Designated Trustee for Safeguarding.

Formal investigations should be undertaken by appropriately trained employees and Trustees. This may involve bringing in an external professional to conduct or advise on the investigation. Separate guidance is provided on conducting a formal investigation.

### Documentation

- The person receiving the initial report of harm to a child or adult, must complete a Cause for Concern form within 24 hours and share this with the Designated Employee for Safeguarding. The information recorded should be as factual and objective as possible and personal opinion should be not be included.
- The form should be signed and dated. This is important as the form could be used in any subsequent criminal investigation or disciplinary proceedings
- The Designated Employee for Safeguarding is responsible for documenting all subsequent actions, communications with external agencies and the outcome of any investigation.
- All documents (soft and hard copies) must be kept confidential. Digital/electronic information must be password protected, and hard copies filed in lockable storage. Data must be encrypted before it is transmitted electronically.

### Tools to support implementation:

- Cause for Concern Form
- Example child protection reporting procedures (Digital & In-country)
- Mapping the external/local CP context and resources
- Guidance on Managing Disclosures & Making Best Interest Decisions
- Guidance on Conducting Internal Investigations
- Internal Register of Child Protection Concerns and Responses