

Safeguarding policy

This policy replaces the Protection Vulnerable Adults and Children policy 2018 and the Protection policy guidelines 2018

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|--|---|
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1. Purpose

HelpAge International is the secretariat to a global network of organisations promoting the right of all older people to lead dignified, healthy and secure lives.

We are committed to ensuring that older people are protected from all forms of harm and abuse arising from our programmes, operations and staff. All our staff are expected to uphold the highest standards of behaviour set out in our Code of Conduct and we will take action against wrongdoers who use their position of trust to harm older people.

As an organisation we want to protect all members of the communities where we work from harm caused by our work, whether intentional or unintentional.

The purpose of this policy is therefore to protect all people from harm that may be caused as a result of our work. All people refers to older people, at-risk adults, children and our own staff.

This includes harm arising from:

- The conduct of staff or representatives of HelpAge.
- The design and implementation of HelpAge's programmes and activities, including through partners¹.
- The operations² of HelpAge that support its activities.

The policy sets out the commitments made by HelpAge to everyone who comes into contact with its work and informs staff and representatives³ of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace this is covered by HelpAge's Equal Opportunities and Dignity at work policy
- Other serious incidents in the workplace this is covered by HelpAge's Serious incident Reporting policy

2. What is safeguarding?

Safeguarding is the responsibility of organisations to make sure their staff, operations, and programmes do no harm to older people, adults at-risk and children nor expose them to abuse or exploitation. This encompasses PSEA⁴ and child safeguarding.

Prevention of Sexual Exploitation and Abuse (PSEA)

In common with the humanitarian and development community we use this term to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

¹ See Appendix one for definition of a partner

² See Appendix one for definition of operational activities

³ See Section 3 Scope or definition of representatives

⁴ Prevention of Sexual Exploitation and Abuse

HelpAge safeguards everyone who encounters its work, including protecting staff from harm and inappropriate behaviour such as bullying and harassment.

Further definitions relating to safeguarding are provided in the Glossary in the Appendices.

3. Scope

- All staff contracted to HelpAge
- Representatives of HelpAge engaged with work or visits related to HelpAge including, but not limited to the following: Board members, network members, partners, consultants, volunteers, and incentive workers, contractors, visitors including journalists, celebrities, donors and politicians

4. Policy statement

HelpAge believes that everyone we encounter regardless of age, disability, sex , gender reassignment, sexual orientation, religion, ethnic origin, marriage/civil partnership status, maternity or pregnancy⁵ or other characteristic has the right to be protected from all forms of harm, abuse, neglect, discrimination and exploitation.

HelpAge will not tolerate staff or representatives carrying out any form of harm and abuse, including sexual harassment, abuse, and exploitation and will take appropriate action.

HelpAge protects the rights of adults to live in safety, free from abuse and neglect and children from abuse and maltreatment.

HelpAge practises a survivor-centred approach. This means that the safety and wellbeing of the survivor are paramount, and although we encourage survivors to report safeguarding concerns, no-one who has directly suffered harm and abuse is obliged to make a direct report. HelpAge will always consider the wishes of the survivor, whilst recognising that the organisation has a wider responsibility to reduce the risk of further harm to the survivor and other people. HelpAge believes the reports of survivors and will establish through an investigation if there is enough evidence to support the report.

HelpAge will also support the subject of the report (wrongdoer) and ensure that the investigation is fair and objective.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse.

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

Associated HelpAge policies and procedures

- Anti-bribery and fraud policy
- Code of conduct
- Data protection policy

⁵ These are the protected characteristics described in the Equality Act 2010 embedded in our Equal Opportunities and Dignity at Work policy

- Equal opportunities and dignity at work policy
- Grievance and disciplinary policy
- IT services policy
- Risk management policy
- Modern slavery statement
- Partnership management policy and procedures
- Procurement policy
- Safeguarding toolkits
- Serious incidents reporting policy
- Social media use guidelines
- UK Recruitment of ex-offenders policy (drafted)
- Values

5. Principles

Do No Harm

HelpAge applies the principle of 'Do No Harm' in its work to prevent and minimise the harm that may be done by staff and representatives, operations, and programmes.

Inter-Agency Standing Committee (IASC) Core Principles on PSEA

HelpAge is committed to the IASC⁶ Core Principles on PSEA:

- 1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
- 2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- 3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
- 4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- 5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
- 6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have

⁶ Inter-Agency Standing Committee, see Glossary in Appendices

particular responsibilities to support and develop systems which maintain this environment.

Other international standards

We abide by additional **international standards** which have informed this policy and our approach:

- UN Secretary General's Bulletin on Special Measures for protection from sexual exploitation and sexual abuse (ST/ SGB/2003/13), and other international conventions
- The Core Humanitarian Standard (including the PSEA index)
- DfID's Enhanced Due Diligence Checklist
- The UN Principles of Older People (1999)
- The UN Convention of the Rights of the Child (1989), and its associated regional conventions
- The Convention for the Elimination of Discrimination Against Women (CEDAW)
- The International Covenant on Economic, Social and Cultural Rights
- The International Convention on the Elimination of all Forms of Racial Discrimination
- The Slavery Convention, as amended, and The Supplementary Convention on the abolition of Slavery
- The Convention on the Status of Refugees and its additional protocol
- The Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment
- The four Geneva Conventions of 1949, containing humanitarian rules for armed conflicts

6. Prevention

HelpAge responsibilities

HelpAge will:

- Appoint a Safeguarding Lead in London
- Describe the standard of behaviour expected of staff and representatives, specifically forbidding sexual exploitation and abuse in the Safeguarding policy and Code of conduct.
- Review at least every two years the safeguarding policy and procedures to ensure they are fit for purpose.
- Create an action plan that identifies gaps in implementing safeguarding measures which is reviewed quarterly.
- Develop a safe working and operating culture where complaints are taken seriously and acted upon.
- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and their job description
- Recognise the rights of all staff and beneficiaries to be protected from sexual exploitation and abuse.
- Set up mechanisms like Safeguarding Committees in all offices with members responsible for safeguarding measures embedded in programme design and delivery and HR processes.
- Identify and manage the risk of harm from staff, operations and programmes in the design phase and throughout the programme cycle, in consultation with communities.

- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise because of encountering HelpAge staff and representatives. This includes how information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, inducting, managing, and deploying staff and representatives.
- Include safeguarding responsibilities in job descriptions.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation.
- All contracts with partners/suppliers/contractors include safeguarding clauses.
- Evaluate partners' safeguarding measures in our due diligence on partners
- Capacity building for partners includes capacity to implement safeguarding measures and ongoing monitoring of safeguarding prevention, reporting and response.
- Complaint response mechanisms are developed internally and externally to receive and respond to safeguarding concerns promptly and ensuring the safety of all parties.
- Follow up on reports of safeguarding concerns promptly and according to our internal process.
- Take action on breaches of the Safeguarding policy and Code of conduct
- Feedback to survivors on actions taken.

Staff responsibilities

Child safeguarding

HelpAge staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional, or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking
- Use photos or case studies of children to cause or expose them to harm
- Target a child for grooming purposes or engage them in a relationship online

Adult safeguarding

HelpAge staff and associated personnel must not:

- Sexually abuse or exploit at-risk adults
- Subject an adult at risk to physical, emotional, or psychological abuse, or neglect
- Use the services of a sex worker

See the HelpAge Equal Opportunities and Dignity at work policy for responsibilities between staff.

Protection from sexual exploitation and abuse

HelpAge staff and associated personnel <u>must not</u>:

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

Additionally, HelpAge staff and representatives <u>must</u>:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy and Code of conduct
- Report any concerns or suspicions regarding safeguarding breaches internally, whether committed by HelpAge staff, representatives or implementing partners or their representatives.

7. Enabling reports of safeguarding concerns

HelpAge will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, representatives, and the communities we work with. Implementing partners are required to design and develop sufficiently robust complaint response mechanisms for their staff and communities to raise safeguarding concerns.

HelpAge programme and humanitarian management will ensure that all our programmes and emergency response initiatives, whether delivered directly by HelpAge or through partners, have designed and implemented an effective complaint response mechanism⁷ in consultation with community members to identify the most appropriate channels for them to report harm and abuse by staff or partner staff. HelpAge will provide training to staff and partners on effective complaint response mechanisms, and relevant staff will ensure that these are in place.

Details of these mechanisms will be communicated visually where possible, considering the local language and literacy needs.

Where interagency mechanisms exist, HelpAge will still need its own complaint response mechanism to handle and respond to any complaints it receives via that route.

In some situations, like emergency response, it may not be possible to consult with communities on the design of the complaint response mechanism, but every effort should be made to consult with them on accessibility and any barriers to reporting at the earliest opportunity so that changes can be made.

Our process for staff and partners to escalate concerns to the Safeguarding Lead in the London office within 24 hours is shared with the Leadership team, programmes staff and partners. All reports are taken very seriously.

Please see Appendix 3 Reporting flowchart for further details.

HelpAge trains its field staff and builds the capacity of implementing partners to design and develop effective complaint response mechanisms that handle and respond to safeguarding concerns in the community.

Field staff and partners will actively engage community members in the design and development of complaint response mechanisms and review existing mechanisms by seeking feedback and making adjustments as needed. Field staff and partners will need to consider and address the barriers to reporting safeguarding concerns, identified through community consultation and engagement.

It is the responsibility of field staff to raise awareness in the community of the types of harm and abuse that need to be reported and ensure that people know how to report a

See 20 core elements: a toolkit for strengthening safeguarding report handling (Bond, 2019)

safeguarding concern and what will happen when they do, including that reports are not secret and will be shared with staff who have a valid requirement for information for a relevant purpose, for example for investigating the concern. The concern may be reported by the relevant Director to local authorities, if doing so does not present a further risk of harm to the survivor.

Staff and community members can make anonymous reports about harm and abuse they have survived, seen, heard about or suspect, but this may make it difficult to investigate or support the survivor.

HR staff are responsible for ensuring that all staff, including volunteers and consultants, are aware of the behaviours that are expected of our staff and representatives as outlined in our Code of conduct and Safeguarding policy, including mandatory reporting of suspicions and concerns. They will also make employees aware of our Equal Opportunities and Dignity at work policy which addresses behaviours between staff. Awareness will be raised through sharing policies and providing induction and refresher training.

HelpAge staff managing partnerships with other organisations responsible for ensuring that partners complete the safeguarding aspects of partnership assessment, capacity is built, and safeguarding measures are embedded and monitored.

Members of the public, partners and official bodies can raise safeguarding concerns directly to the Head of HR at concerns@helpage.org, the CEO ceo@helpage.org, the Chair of the People's Committee CPC@helpage.org or the Charity Commission in the UK www.gov.uk/complain-about-charity. These channels will be advertised on our website.

8. How staff can report a safeguarding concern

If a staff member hears or suspects something in an informal discussion or chat that they think is a safeguarding concern, they should report this via the internal reporting channel. They do not need to know all the details, produce evidence, or know the name of the survivor or wrongdoer.

Staff members who have received a concern or have a concern or suspicion relating to safeguarding should report it **immediately** to their line manager or Director. The line manager or Director must escalate to the Head of HR **within 24 hours**.

If the staff member does not feel comfortable reporting to their line manager or Director (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern), they may report it directly to the Head of HR or the CEO or the Chair of the People's Committee (sub-committee of the Board), or the Charity Commission.

If any manager receiving a report or concern from a staff member does not wish to escalate to the Head of HR, they can escalate directly to the CEO, or the Chair of the People's Committee (sub-committee of the Board), or the Charity Commission.

Staff can report anonymously but this may make it difficult to investigate or support the survivor.

Contacts for staff to escalate safeguarding reports/concerns:

- Head of HR concerns@helpage.org
- CEO ceo@helpage.org

- Chair of the People's Committee CPC@helpage.org
- Charity Commission www.gov.uk/complain-about-charity

How to report if you have suffered harm or abuse yourself

Staff who are the survivors of a safeguarding incident at HelpAge can report in the same way or via the Grievance policy.

Survivors can report at any time but are encouraged to report as soon as possible so that we can prevent or stop the harm and abuse and ensure survivors are safe and supported.

If you have suffered harm and abuse that does not relate to the work of HelpAge, its representatives or associates including partners, we will talk to you about any support you need from external agencies.

Reporting directly to the Charity Commission

A staff member will be protected against any negative repercussion because of escalating or reporting externally to the Charity Commission, if due process is followed and if the report is not malicious or false. See the HelpAge Serious Incident Reporting policy.

9. Response

Supporting survivors of harm and abuse

The safety and welfare of survivors is our priority. All field, HR, management, and investigators will be trained in the principles of psychological first aid to enable them to respond to the immediate needs of identified survivors as well as complainants if they are different people.

Every Safeguarding Committee is responsible for keeping and maintaining a log of survivor support services accessible in their office location for staff and in the field for community members.

HR staff maintain and hold the survivor support map for the office. Any staff who have survived harm and abuse or have made a complaint can choose whether to be referred to those services.

Programme management maintains the survivor support maps for every programme location and is responsible for ensuring that all field staff have a copy of a current survivor support map of services available for community members to be referred to. Community survivors and complainants can choose whether to be referred to these services.

Wider community abuse

If a safeguarding concern is received about abuse in the wider community which is not alleged to have been committed by HelpAge or their representatives or partners, this should be logged by field staff, and signposting support offered. We will **not investigate**.

Handling safeguarding reports

This section refers to procedures for dealing with reports of a breach of the Safeguarding Policy and Code of Conduct where

- The survivors are community members in locations where we are working, or staff
- Alleged wrongdoers are staff, representatives, or partners

Process for responding to safeguarding complaints

If a safeguarding concern is disclosed directly to a member of staff, the person receiving the report should follow this process:

- Ensure the safety and welfare of the survivor and complainant (if different people) and their dependents, including medical assistance, moving to a secure location
- Check if they need a translator
- Check if they need to report to a different staff member eg person of the same gender
- Look and listen
- Explain that you will need to report any serious issues internally; what they tell you will need to be shared with someone responsible for dealing with safeguarding concerns.
- Explain HelpAge will take their wishes into consideration but may need to investigate further to stop harm or prevent further harm and abuse
- Explain that you need to write information down for internal reporting
- Empathise with the person; do not talk about yourself
- Believe what you are being told; do not judge
- Ask the survivor what they would like to happen
- Ask who, when, where, what but <u>not</u> why
- Repeat/check your understanding of the situation
- Do not investigate
- Refer to other agencies for support, as needed, referring to the survivor support map eg psychosocial care or counselling.
- Document the information using an incident report form -see Appendix two Reporting form
- Tell the survivor/complainant what will happen next
- In the field, update the log of complaints immediately
- Send the report form to the Head of HR in London within 24 hours
- Do <u>not</u> report to the local authorities; the Head of HR and the Regional/Country Director will make that decision prioritising the safety of people involved

Documenting the report

The person receiving the report should document as much information as possible using an incident report form and ensure that the data is kept securely following our Data Protection and IT security policies:

- Name of person making the report
- Name of the survivor of safeguarding incident if a different person to the complainant
- Name of alleged wrongdoer if known
- Description of the incident
- Date, time and location of the incident

- Age of the survivor if under 18 (this may not be known)
- Wishes of survivor

Reports from children

Best practice generally dictates that parents (or guardians/carers) of children should be informed if the child has to be interviewed because they are best placed to support and protect the child. There are however certain circumstances where it may not be appropriate to inform the parents/guardians, taking into consideration the safety of the child.

Reports received by partners

Partners need to follow the same process, including reporting to the HelpAge Safeguarding Lead **within 24 hours**.

Confidentiality

Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained at all stages of the reporting process, and information shared on a limited need-to-know basis only. This means that information is only shared with people who have a **valid** requirement for information to be used for **relevant** information.

This includes senior management who might otherwise be appraised of a serious incident. Senior management can be advised that a safeguarding concern has been reported, without receiving any details that can identify the survivor/complainant or wrongdoer.

Next steps by the Safeguarding Lead after receiving a report

Where the report is made by or about HelpAge staff

- Ensure the safety and welfare of the survivor and complainant (if different) have been prioritised by the person receiving the report of harm and abuse
- Check any support needs of the person receiving the report
- Contact the relevant Regional and/or Country Director to inform them of the report
- Directors will share their local context map with details of local legislation and culture relating to safeguarding
- Update the HelpAge log of safeguarding incidents
- Escalate the report to the Charity Commission and the Board
- Arrange for the relevant donor to be informed
- Establish whether the report relates to a breach of the Safeguarding policy or Code of conduct
- Form an investigations team where a breach is alleged to have occurred (even if a suspicion) from the pool of trained staff investigators
- Engage an external investigator where extra resources or specialisms are required eg where children are involved as survivors, complainants, or witnesses
- Take appropriate action where wrongdoing has occurred (see Consequences for wrongdoers below)
- Coordinate the feedback to the survivor and community
- Hold a case review

Where the report is made to a Partner about their staff or representatives

All partners are required to escalate safeguarding concerns to the HelpAge Safeguarding Lead within 24 hours.

The HelpAge Safeguarding Lead will

- Check that the Partner has ensured the safety and welfare of the survivor and complainant (if different)
- Check their next steps regarding investigations
- Agree when updates will be shared by the Partner including timely communication to the parties involved about the process
- Receive a copy of the investigation and outcome
- If not satisfied with the quality of the investigation and outcome, re-investigate
- Ensure actions are communicated to the survivor
- Keep relevant Directors informed of the process
- Hold a case review

Safeguarding investigations

HelpAge is committed to carrying out **fair and proportionate** investigations to stop and prevent harm by wrongdoers.

All safeguarding investigations are managed by the Head of HR as Safeguarding Lead who forms the investigation team which will conduct the investigation into the allegations made in the safeguarding report.

HelpAge provides **training** for the Safeguarding Lead and several staff in the regions in conducting safeguarding investigations. Investigations teams will include at least two members of staff who have completed this training, unless for operational reasons or issues of confidentiality, this is not possible or appropriate, or external specialised skills are needed.

The investigations team will undertake a **risk assessment** to determine any protection or security risks to any stakeholders in the case and develop a mitigation plan if required.

The investigation team will establish whether there is **sufficient evidence** to support the concern raised in the safeguarding incident report. Insufficient evidence does not mean that we do not believe the survivor. The survivor will always be believed.

The function of the investigation team is to gather all relevant evidence to determine objectively whether a breach of the protection policy occurred. Evidence comes in several ways, but most commonly the evidence will be gathered through:

- Witness testimony (for example: statement about what someone saw, heard, etc.)
- Documentary evidence (for example: forms, photographs, email logs, web searches etc)
- Physical evidence (for example: examination of the location where the abuse took place)
- Expert evidence (doctor's report)

If at any stage in the investigation, criminal activity is suspected, the case should be referred to the relevant local authorities, **unless this poses a risk to anyone involved in the case**. The decision about contacting local authorities will be made by the Head of HR after consultation with the Regional and Country Director.

The investigations team will document the investigation and produce a report which makes the following recommendations:

- **Substantiated** = enough evidence to support the concern
- **Unsubstantiated** = insufficient evidence to support the concern

The Head of HR will review the report with the Chief Operating Officer and decide the following:

- Whether a re-investigation is required
- Where the allegation is substantiated:
 - Staff: commence the disciplinary process which could lead to disciplinary actions including dismissal.
 - o Terminate agreements with volunteers
 - o Terminate contracts with contractors and consultants
 - o Withdraw funding from partners

Feedback to the survivor/complainant

The Head of HR will ensure that feedback will be given to the survivor/complainant on the action taken and that the case is closed. Parties will be invited to feedback as part of the case review.

Closing cases

The Head of HR will record all decisions made systematically and store securely with the incident report and investigations report. The status of the incident on the log will be updated to 'closed'.

Data will be anonymised and fed into organisational reporting requirements eg for the Board and donors.

Case review

The Head of HR will organise a case review for learning and log any policy changes or training requirements for staff or partners to strengthen our safeguarding practice. HelpAge will seek to involve the survivor and give them a voice, where it is safe for them to do so, and they are willing to feedback.

10. Appendices

Appendix one: Glossary of terms

Beneficiary

Someone who directly receives goods or services from HelpAge's programme. Note that misuse of power can also apply to the wider community that the NGO serve, and also can include exploitation by giving the perception of being in a position of power.

Child

Children are defined by the UN Convention of the Rights of a Child as being someone under the age of 18 years of age. Using the mistaken belief in not realising someone is a minor is not an excuse or defence for sexual relations with someone under 18.

Harm

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

Inter-Agency Standing Committee (IASC)

IASC is a unique inter-agency forum for coordination, policy development and decision-making involving the key UN and non-UN humanitarian partners. The IASC was established in June 1992 in response to United Nations General Assembly Resolution $\frac{46/182}{48/57}$ affirmed its role as the primary mechanism for inter-agency coordination of humanitarian assistance.

Modern Slavery means modern-day slavery or human trafficking, including forced labour, debt bondage, descent-based Slavery or child slavery and any act in breach of the UK Modern Slavery Act 2015.

Partner

HelpAge develops partnerships with other organisations who are committed to our mission and to develop our work and extend our global reach. Partners who receive funding from HelpAge to deliver programmes undergo our internal due diligence process which includes safeguarding measures. We work with them to build capacity and monitor their safeguarding measures throughout the life of the programme.

Operations

Refers to the compliance, systems and equipment that help the organisation runs its activities. This will include data protection, IT systems and security, and insurance.

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name-calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

PSEA

Prevention of Sexual Exploitation and Abuse

Safeguarding

In the UK, safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect⁸

In our sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect subjects of complaints during the investigation process.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery. For a fuller definition of modern slavery in all its forms, please see **Modern Slavery** above.

Survivor

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

⁸ NHS 'What is Safeguarding? Easy Read' 2011

At-risk adult

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

Wrongdoer

The person who has committed the harm or abuse. This term is preferable to 'perpetrator' which suggests a criminal offence has been committed. 'Alleged wrongdoer' refers to the person accused of committing harm or abuse.

Appendix two: Safeguarding reporting form

Part 1

This form is for HelpAge staff to write down details they receive from community members or staff about safeguarding incidents they see, hear or suspect. Staff members can also use this form to report directly as a complainant or survivor.

Before asking for information

- > Check you are in a confidential and safe place
- > Tell the survivor/complainant about our procedure what will happen afterwards- who needs to be informed we may decide to report to the authorities if others may be harmed and it does not harm them if we report.
- > Explain they do not have to give their name, but this may make it hard for HelpAge to investigate fully and take action.
- > Explain that this form has two parts: one for information-gathering; one for signature and consent.

Next steps

- > Write down what the complainant/survivor says they experienced, saw, heard or suspect.
- You are not responsible for checking or following up to establish facts.
- ▶ Do not investigate. Investigations are the responsibility of trained HelpAge staff and are managed by the Safeguarding Lead (Head of HR).

| Name of the complainant | | |
|--|-----|--|
| Address or contact details | | |
| Age - if unknown, do you think they are under 18? | | |
| Nationality/ethnicity | Sex | |
| Is the complainant a beneficiary/community member/staff member – please describe | | |
| Is the complainant the survivor? Yes/No | | |

| Name of survivor (if different) | | |
|---|-----|--|
| Address or contact details | | |
| Age – if unknown, do you think they are under 1 | 8? | |
| Nationality/ethnicity | Sex | |
| Name and address of parents if under 18 | | |
| Has the survivor given their consent for this information to be shared? Yes/No | | |
| Is the complainant a beneficiary/community member/staff member – please describe | | |
| Do they want to be anonymous? Yes/No If they wish to remain anonymous, explain that this may mean it is hard to complete a full investigation. | | |

| Date of incident | | Time of incident | |
|--|------------------------------|--------------------------|--|
| Location of incident | | | |
| Location of incident | | | |
| Location of HelpAge office/location related to this complaint | | | |
| Brief description of incident | | | |
| How does the survivor describe their injuries and/or feelings? | | | |
| | | | |
| Name and contact detail | ls of witnesses | | |
| Witness 1 | | | |
| Have they given consen | t for their details to be sh | ared? Yes/No | |
| Witness 2 | | | |
| | | | |
| Have they given consent for their details to be shared? Yes/No | | | |
| Witness 3 | | | |
| Have they given consent for their details to be shared? Yes/No | | | |
| Witness 4 | | | |
| | | | |
| Have they given consent for their details to be shared? Yes/No | | | |
| | | | |
| | | | |
| | | | |
| Name and details of alleged wrongdoer | | | |
| Name and details of alleged wrongdoer | | | |
| Person 1 | | | |
| Λαe | Sex | Relationship to survivor | |
| Age | Jea | relationship to survivor | |
| Which organisation, if a | ny, does this person repre | esent? | |

| What is their role in the organisation? eg employee, volunteer, trustee, consultant, partner staff, donor | | | |
|---|----------------------------|--|--|
| donor | | | |
| | | | |
| If they do not represent | t an organisation, please | describe any role in the community. | |
| | | | |
| | | | |
| Name and details of alle | aged wrongdoer | 1 | |
| Person 2 | | | |
| Person 2 | | | |
| | | | |
| Age | Sex | Relationship to survivor | |
| Miles averagestics if a | da aa khia waxaa wax | *************************************** | |
| which organisation, if a | any, does this person rep | resent? | |
| | | | |
| What is their role in the | organisation? eg employ | ee, volunteer, trustee, consultant, partner staff, | |
| | | | |
| | | | |
| If they do not represen | t an organisation, please | describe any role in the community. | |
| | | | |
| | | | |
| | | | |
| What support does the | e survivor want/need? | | |
| | | | |
| | | | |
| Have they been inform | ned on the services avail | able? (refer to survivor support map) | |
| | | | |
| Who is responsible for | following the referral p | ılan? | |
| | Tonouning the reservant | | |
| What safety concerns | does the survivor have? | | |
| What salety concerns | does the salvivor have: | | |
| | | | |
| How have we responde | ad? | | |
| now have we respond | eu: | | |
| Heathe anning contested the malice or such suities? | | | |
| Has the survivor contacted the police or authorities? (NB Safeguarding Lead and relevant Director will decide whether HelpAge will report to the local | | | |
| authorities) | | | |
| Yes/no | | | |
| Yes/no | and relevant Director will | | |
| Yes/no | and relevant Director will | | |
| | | | |
| Yes/no If yes, what happened? | | | |

| What support does the complainant (if different from survivor) want/need? |
|--|
| what support does the complanant in amerent hom salvivor, many need. |
| |
| Have they been informed on the services available? (refer to survivor support map) |
| |
| Who is responsible for following the referral plan? |
| What safety concerns does the complainant have? |
| |
| How have we responded? |
| |
| Has the complainant contacted the police or authorities? Yes/No |
| (NB HelpAge Head of HR and relevant Director will decide whether HelpAge will report to the local authorities) |
| If yes, what happened? |
| |
| |
| Any other relevant information |
| |
| Name and role of person completing this report |
| |

Continue to the next page for Part 2 of this form

Signature

Date

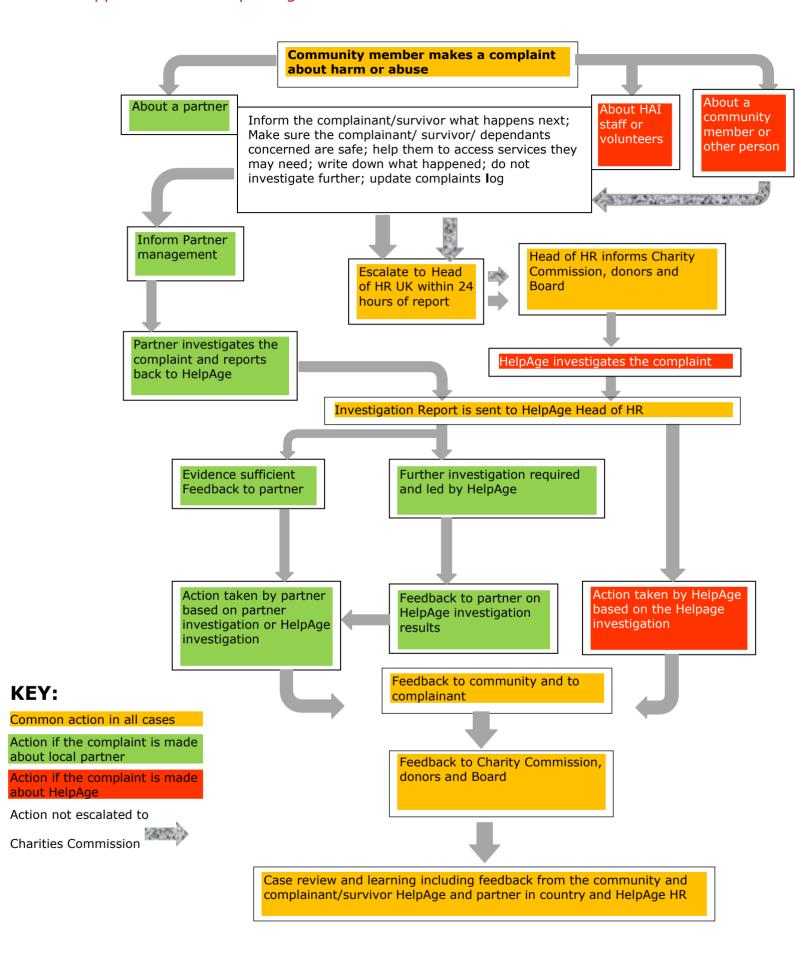
Next steps

- Ask the complainant/survivor to sign Part 2 on the next page
 Enter the details on this form onto the secure webform and destroy part one of this form.
 The webform will automatically be sent to the Head of HR who will contact you
 Note the reference no of the webform and write it on Part 2 and store securely locally

Part 2

| Safeguarding incident REF NO Please write the reference no from the webform | | |
|---|------------------------|--|
| Name (optional) | | |
| I confirm that I have received information about what will happen next, who needs to be informed and that HelpAge may decide to report to the police and / or local authorities if others may be harmed and reporting to the authorities does not cause further harm to me. | | |
| I have been offered support | | |
| I give consent for my name to be shared with this report yes/no You do not have to give your name if you do not want to | | |
| Date | Signature or thumbmark | |

Appendix three: Reporting flowchart



Safeguarding policy

I confirm that I have read and understood the content of HelpAge International Safeguarding policy and have been given full opportunity to discuss or ask questions to clarify any points that I did not understand.

I am clear about my obligations to prevent, respond to and report where harm and abuse or suspected harm and abuse is or has been taking place and understand the consequences if I fail to prevent, respond to and report harm and abuse.

| NAME (print) | | |
|--------------|------|--|
| | | |
| | | |
| SIGNATURE | Date | |