

Policy and Procedures on the Safeguarding of Children and Vulnerable Adults

November 2017

1. Sustain for Life's Policy on Safeguarding and Protecting Children and Vulnerable Adults

1.1. Our philosophy

Sustain for Life (SFL) takes the safeguarding of children and vulnerable adults extremely seriously. It is our utmost concern that we ensure the safety of all those that we come into contact with through our work. SFL believes that no one should ever experience harm, abuse, neglect and exploitation of any kind and we are committed to safeguarding all children and vulnerable adults, irrespective of ability, ethnicity, faith, gender, sexuality and culture.

We have a responsibility to protect those most vulnerable to abuse and harm, particularly by safeguarding and promoting the welfare of children and vulnerable adults. We are committed to ensuring that all of our staff, trustees, partners, volunteers, consultants, associates and visitors uphold our safeguarding principles and actively seek to safeguard children and vulnerable adults at all times.

1.2. Purpose

The purpose of this policy is:

- To ensure the protection of children and vulnerable adults who receive Sustain for Life's or our partners' services and support.
- To ensure the protection of all children and vulnerable adults who our staff and associates come into contact with in any context.
- To ensure that there is an agreed, understood and standardised approach to safeguarding across the organisation and ensure staff, trustees and volunteers have signed up to the overarching principles that guide our approach to safeguarding children and vulnerable adults.

1.3. Scope of the policy

This policy applies to all staff, including senior managers and the board of trustees and paid staff and associates including volunteers and freelance workers, agency staff, interns, students and visitors or anyone working on behalf of SFL, hereafter known as 'staff and associates'.

This policy applies at all times, while staff and associates are at work and outside work. Staff and associates need to understand that they represent, or are identified with, the organisation at all times. **Given recent media reports and the spotlight that is now placed on the charitable sector, all SFL members of staff, trustees, donors or any programmes visitors should bear in mind Sustain for Life's Safeguarding Policy and their conduct not only whilst making a visit to an SFL project but also the behaviour and activities conducted in their own time. SFL will not tolerate the exploitation or abuse of any potentially vulnerable people including those that are not associated with SFL projects.**

1.4. Definitions:

1.4.1. Associates

Sustain for Life associates include volunteers and freelance workers, agency staff, interns, students and visitors or anyone working on behalf of SFL. SFL visitors refers to a range of persons who are visiting our programmes and may come into contact with children and vulnerable adults, including funders, journalists, media, researchers, and celebrities.

1.4.2. Child

A child is any person up to the age of 18, regardless as to whether or not this age is recognised in national law in the countries where we work.

- 1.4.3. **Bullying**
Bullying is negative “behaviour, often applied from a position of strength and usually repeated in a systematic manner over time that hurts another individual or group, physically or emotionally”. It can be in person, or online.
- 1.4.4. **Partner:**
Partner refers to a local organisation that receives funding from SFL for a specific project or towards core costs or a local organisation involved in project work with SFL, regardless of whether or not any funding is involved.
- 1.4.5. **Physical abuse**
Actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
- 1.4.6. **Sexual abuse**
Forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.
- 1.4.7. **Child sexual exploitation**
A form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim’s options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.
- 1.4.8. **Neglect and negligent treatment**
Allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child’s basic physical and/or psychological needs, which is likely to result in serious impairment of a child’s healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.
- 1.4.9. **Emotional abuse**
Persistent emotional maltreatment that impacts on a child’s emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

1.4.10. Commercial exploitation

Exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

1.4.11. Safeguarding

- Protecting from maltreatment
- Preventing impairment of health and development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- Taking action to enable beneficiaries have the best outcomes

1.4.12. Vulnerable adults:

Vulnerable adults include people with physical and or/learning disabilities, or who have difficulty communicating, or who rely on others to provide personal care.

1.5. Our principles

We recognise that:

- The welfare of the child is paramount, as enshrined in the United Nations Convention on the Rights of the Child (UNCRC).
- The welfare of vulnerable adults is paramount, as enshrined in the United Nations Convention on the Rights of Persons with Disabilities.
- Abuse of children or vulnerable adults is never acceptable.
- We have a commitment to protecting children and vulnerable adults with whom we work.
- All children and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse.
- Some children and vulnerable adults are additionally at risk because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- When we work through partners, they have a responsibility to meet minimum standards of protection for children in their programmes. Please see our Partner Safeguarding agreement and checklist in chapter 7 for more details.
- Working in partnership with children and vulnerable adults, their parents, carers and other agencies is essential in promoting safeguarding of children and vulnerable adults.

1.6. We will seek to keep children and vulnerable adults safe by:

1.6.1. Preventing harm to children and vulnerable adults (safeguarding and risk mitigation). Scoping and safe programme design:

- Before implementing a project, Sustain for Life or the relevant partner will, assess the social and environmental impact, of the projects and/or programme/s.
- Ensuring that a safeguarding mapping is carried out in all localities where we work to understand which authorities to report abuse to and what organisations are working nationally and locally that can provide advice on reporting cases.
- Ensure we are aware of the official safeguarding processes and procedures that have been established in the locality as well as tailoring our strategies and policies to fit each new context.
- Ensure that our programmes and projects are designed to uphold our principles outlined in this document and ensure that children and vulnerable adult safeguards are embedded within them.
- All our projects and programmes minimise risk to children and vulnerable adults and take into account the environment, context and impact (intended or unintended) on the children and communities around them.

Safe recruitment:

- All recruitment and induction of staff and volunteers is done safely, ensuring police checks are in place and references are sought before appointing to posts in line with our Safe Recruitment, Induction, Supervision and Training Policy (see chapter 3 for details)
- Recruitment procedures will include checks on suitability for working with children and vulnerable adults.
- Ensuring that organisations in direct receipt of Sustain for Life funding will have a policy in place on the protection of children and vulnerable people.

Communicating the policy:

- The policy will be publicised to all staff and associates, partners, children and communities that we work with.
- The policy key principles will be put into a poster displayed in public places such as meeting spaces and our office.
- A copy of the policy will be made available on our website
- A copy will be enclosed with all grant agreements with SFL programme and implementing partners as appropriate.
- The key requirements of this policy will be given to sponsors and donors.

1.6.2. Creating an environment which promotes safeguarding and the principles contained in this policy

Pro-safeguarding behaviour:

- Our staff and associates will provide leadership by practising in full, safeguarding behaviour in all that we do including demonstrably valuing children and vulnerable adults, listening to and respecting them.
- Sharing information on our safeguarding policy and procedures with the children and vulnerable adults that we work with so that they are clear on what they can expect from us.
- Sharing information about child protection and good practice with children and vulnerable adults, parents/carers, staff, volunteers and programme visitors.
- Promoting safeguarding principles to guard against any type of bullying or abuse between beneficiary children, vulnerable adults or between the staff that we work with.
- Potential visitors to projects funded or implemented by Sustain for Life must be approved by the Executive Director at least 48 hours in advance. Given the vulnerability of Sustain for Life's project beneficiaries, we will limit the number of visitors to our projects and we prioritise SFL staff/ consultants, trustees and donors. We also reserve the right to refuse unauthorised individuals from participating in project visits.

Monitoring and continuous improvement of programmes:

- Monitoring the situational context of our programmes and keeping alert to changes in safeguarding practices in the locality or environmental factors which are likely to impact on the wellbeing of children and vulnerable adults.
- If it comes to light that our programmes could be made safer for children then we will ensure that this is implemented as a matter of priority.

Management will:

- Make it clear through our codes of conduct, recruitment procedures, training and internal communications that the abuse of children and or/vulnerable adults by staff, volunteers and associates will not be tolerated.
- Ensure staff understand that the obligation on staff and associates to keep children and vulnerable adults safe extends to their conduct towards children and vulnerable adults with whom they have contact, outside the work environment as well as inside.

- Ensure all staff and associates have access to a copy of the safeguarding policy and procedures and that it is available on the SFL website.
- Ensure that all images used of children and vulnerable adults meet the standards of our Policy on Using Images of Children or Vulnerable Adults (see chapter 4 for a copy of this policy)
- Provide effective management for staff and volunteers through supervision, support and training in line with our Safe Recruitment, Induction, Supervision and Training Policy (see chapter 3 for details)

Governance and accountability:

- Ensure that there is a clear governance and accountability structure as outlined in Sustain for Life's safeguarding governance and accountability framework (see chapter 8).
- Ensure that there are named safeguarding officers/co-ordinators and focal points at all levels of the organisation who are clear of their roles and responsibilities.
- Ensure there is a clear and accessible system for identifying and reporting abuse in line with Sustain for Life Procedures for identifying and reporting abuse and safeguarding concerns (see chapter 9).
- Ensuring checks and balances within our safeguarding governance to ensure that our policy and procedures are being met and checked.

1.6.3. Acting swiftly and decisively if a safeguarding concern comes to our attention

- Ensuring that staff and associates are clear what steps to take where concerns arise regarding the safety of children and vulnerable adults in line with our Sustain for Life Procedures for identifying and reporting abuse and safeguarding concerns (see chapter 9)
- Being mindful that abuse may come to light within the communities that we work and may not be due to our organisation's programmes or operations and yet still recognising our responsibility to report on suspected or actual child abuse taking place.
- Reporting any concerns to the formal authorities of the relevant country. Where they are weak or unreliable, reporting to organisations that are able to deal with cases appropriately such as alternative safeguarding organisations.
- Seeking guidance to ensure that children and their families are not put at further risk or made vulnerable by the very action of reporting harm and/or abuse.
- Sharing concerns with agencies who need to know, and involving others appropriately in line with Sustain for Life Procedures for sharing safeguarding information with other organisations (see chapter 11)
- We will ensure that action is taken to support and protect children and vulnerable adults where concerns arise regarding possible abuse.

1.7. Linked policies and procedures

This Safeguarding policy is linked with the following other policies and procedures and must be read in conjunction with them in order to understand the management, accountability and monitoring:

- Sustain for Life's Policy for Safe Recruitment, Induction and Supervision of Staff and Volunteers (See chapter 3)
- Sustain for Life's Policy on Using Images of Children or Vulnerable Adults (See chapter 4)
- Sustain for Life Anti-bullying policy (see chapter 5)
- Sustain for Life staff and associates' Code of Conduct (see chapter 6)
- Sustain for Life Partner safeguarding agreement and checklist (see chapter 7)
- Sustain for Life's safeguarding governance and accountability framework (see chapter 8)
- Sustain for Life Procedures for identifying and reporting abuse and safeguarding concerns (see chapter 9)
- Sustain for Life's Procedure for dealing with allegations made against an employee (see chapter 10)
- Sustain for Life's Procedure for sharing information with other agencies (see chapter 11)
- Sustain for Life's Family and child complaints procedure (see chapter 12)

- Sustain for Life's Whistle blowing procedure (see chapter 13)

1.8. References

This policy was developed with guidance from the following documents:

- Safe Networks Are they safe? Guide
- Safe Network (2014) Everybody's business: Safeguarding for Trustees
- HM Government (2013) Working together to safeguard children. UK
- Keeping Children Safe Guidance (2014) Keeping Children Safe Network.

1.9. Review

We are committed to a trustee review of this policy and its associated procedures annually, when legislation changes or as a response to lessons learned. We are committed to external review of this policy and its associated procedures every three years.

This policy was last reviewed on:(date)

Signed:

Chair, Sustain for Life

Version	Date	Date approved
Safeguarding policy and procedures	12 th February 2014	
Safeguarding policy and procedures	11 th August 2015	
Safeguarding policy and procedures	4 th May 2016	

2. Sustain for Life's Policy for Safe Recruitment, Induction and Supervision of Staff and Volunteers

This policy applies to anyone responsible for recruiting, selecting and inducting staff and volunteers in Sustain for Life and all who participate in shortlisting and interview panels.

Sustain for Life is committed to promoting the welfare of children and vulnerable people and keeping them safe. We are also committed to equality, valuing diversity and working inclusively across all of our activities. We aim to have a workforce that represents a variety of backgrounds and cultures and can provide the relevant knowledge, abilities and skills for our organisation.

2.1. Purpose

The purpose of this policy is:

- To recruit and select the best people available to join our workforce
- To take all reasonable steps to prevent unsuitable people from joining our organisation
- To recruit, select and manage our staff in a way that complies with legislation designed to combat inequality and discrimination
- To do all we can to achieve and maintain a diverse workforce
- To ensure that our recruitment and selection processes are consistent and transparent
- To ensure candidates are judged to be competent before we make them an offer of a job
- To ensure that new members of staff are given a proper induction.

2.2. Safe recruitment

We will ensure safe recruitment by:

- Ensuring that our commitment to safeguarding is mentioned at the earliest opportunity in recruitment adverts, interviews and as part of contracts of employment.
- Holding face-to-face interviews using a transparent system.
- Ensuring all interviews include a discussion on child safeguarding, the candidate's understanding of this and the organisation's commitment. Including specific questions that draw out people's attitudes and values in relation to the protection of children and vulnerable adults.
- A rule that applicants must provide two references, identification and original copies of necessary qualifications before appointment.
- Require an enhanced criminal background check (or equivalent in-country police check) on each member of staff or volunteer whose work with children and/or vulnerable people renders them eligible for such checks.
- Ensure that contract offers for those whose work will bring them directly into contact with children, or gain them access to children's information, will be dependent on suitable references and criminal record checks and an agreement to sign up to SFL's Safeguarding Policy.
- Ensure that staff, consultants and volunteers are recruited to clear job or role descriptions that include a statement on the position or role's responsibilities to meet the requirements of SFL's safeguarding policy and procedures.
- A trial period for all staff and volunteers, with a review before they are confirmed in post.

2.3. Induction

We will induct our staff as follows:

- Induction will include a briefing on safeguarding and child protection issues including SFL's Safeguarding policy and procedures.
- As part of the induction process, new staff will acknowledge that they have gone through and understand the policy and procedures.

2.4. Supervision and training

We will supervise and train our staff as follows:

- Providing support and supervision to programme staff, and those with a safeguarding remit.
- Ensure that staff and associate's knowledge and experience is commensurate with their role and gaps in safeguarding knowledge and experience are highlighted and addressed with training.
- Training, learning opportunities and support on safeguarding is provided by Sustain for Life to ensure the commitments of this policy are met and staff skills and knowledge is in line with best practice.
- Ensuring that Trustees, staff and volunteers are trained in the problem of abuse and the risks to children and vulnerable adults and safeguarding best practice in accordance with and as appropriate to their roles and responsibilities.

This policy was last reviewed on: (date)

Signed:

Chair, Sustain for Life

Version	Date	Date approved
Safeguarding policy and procedures	12 th February 2014	
Safeguarding policy and procedures	11 th August 2015	
Safeguarding policy and procedures	4 th May 2016	

3. Sustain for Life's Policy on Using Images of Children or Vulnerable Adults

Publishing articles and photos on our website and through other media is an excellent way of recognising our beneficiaries' achievements and of promoting Sustain for Life (SFL) and our partners as a whole. However, it is important to minimise the risk of anyone using images of children in an inappropriate way. Digital technology makes it easy to take, store, send, manipulate and publish images.

There are two key principles that SFL will abide by:

- Before taking photos or video, always seek consent from the child/vulnerable adult and make all reasonable attempts to obtain the consent of an appropriate adult or carer for their images to be taken and used.
- When publishing images, make sure they are appropriate and that you do not include any information that might enable someone to contact the child.

3.1. Seeking consent from the child/vulnerable adult

Photographs and video are a valuable but potentially harmful resource, thus informed consent is required. Care should be taken not to cause harm, with the rights of the child and vulnerable adult being the paramount consideration.

The United Nations "Convention on the Rights of the Child" (UNCRC) and "Reporting guidelines to protect at-risk children" provide internationally agreed frameworks that should underpin policy and decision-making in this area. Within the UNCRC, specific articles about the rights of children to participate in decisions that affect them, to be protected, and for all actions to be taken in their best interests are prominent; these principles apply equally to taking photographs of children. Photographs and videos are used with best intentions to advocate for 'greater good' but those that misrepresent or cause additional vulnerability to the child contravene the Convention.

3.2. Ensuring photographs are appropriate and non-identifiable

In order to ensure this:

- It is preferable to use a general or group shot of children or vulnerable adults, without identifying their location or name.
- Ensure details attached to images and included in stories do not allow that the child can be traced to his or her home or community
- Ensure distinctive buildings, street signs or landmarks are not included in images which could help to identify where a child or vulnerable adult lives or works.
- Ensure that the children or vulnerable adults are suitably clothed, and in appropriate poses to reduce the risk of inappropriate use.
- Ensure geotagging of images is disabled when taking photographs.
- Avoid manipulated or sensationalised text and/or images.
- Do not use discriminatory or degrading language.
- Care must be taken in the storage of and access to images.
- In addition, all information relating to children is limited to those members of staff who need to know and will be treated as confidential.
- If using a photographer/journalist/translator, ensure they are accompanied by a member of SFL staff at all times.

Any concerns about inappropriate or intrusive photography, or about the inappropriate use of images or information, should be reported to the Safeguarding Officer and treated in the same way as any other safeguarding concern.

This policy was last reviewed on: (date)

Signed:

Chair, Sustain for Life

Version	Date	Date approved
Safeguarding policy and procedures	12 th February 2014	
Safeguarding policy and procedures	11 th August 2015	
Safeguarding policy and procedures	4 th May 2016	

4. Sustain for Life Anti-bullying policy

4.1. Definition

Our understanding of bullying is that:

- One person or a group can bully others
- Bullying can occur either face to face between individuals or groups, or online using information technology such as computers or mobile phones
- Bullying can include:
 - Verbal teasing or making fun of someone
 - Excluding a person from games and conversations
 - Pressurising other people not to be friends with the person who is being bullied
 - Spreading hurtful rumours or passing round inappropriate photographs/images/drawings of the person being bullied
 - Shouting at or verbally abusing someone
 - Stealing or damaging someone's belongings
 - Making threats
 - Forcing someone to do something embarrassing or potentially harmful or dangerous
 - Harassment on the basis of race, gender, sexuality or disability
 - Bullying causes real distress. It can affect a person's health and development and at the extreme, can cause significant harm

We recognise that:

- People are often targeted by bullies because they appear different from others
- We all have a role to play in preventing bullying and putting a stop to bullying.

4.2. Purpose

The purpose of this policy is:

- To prevent bullying from happening in Sustain for Life as much as possible
- When bullying does happen, to make sure it is stopped as soon as possible and that those involved receive the support they need
- To provide information to all staff, volunteers, children and their families about what we should all do to prevent and deal with bullying.

4.3. Preventing and responding to bullying

4.3.1. We will prevent bullying by:

- Ensuring that bullying is included as a 'don't' within our SFL Code of Conduct
- Holding discussions with staff, volunteers, partners, and beneficiaries to ensure that they understand our anti-bullying policy.
- Checking that the anti-bullying measures are working well.
- Making sure that staff, volunteers, partners, and beneficiaries have clear information about our anti-bullying policy, complaints procedure, and code of conduct.
- Providing support and training for all staff and volunteers on dealing with all forms of bullying, including racial, sexist, homophobic and sexual bullying.

4.3.2. When bullying occurs, we will respond to it by:

- Addressing the issue from the point of view of the person being bullied, the bully, any bystanders and Sustain for Life as a whole
- Ensuring that the safeguarding officer/co-ordinator talks the child or vulnerable adult being bullied and their parent/carer and the bully (or bullies) in order to obtain their account of what has happened or is happening.

- Holding individual meetings with those bullied, the bully (or bullies) and any other relevant or support person to:
 - Discuss the bullying incident
 - Facilitate an apology
 - Draft a plan to address the situation including details of support for the bullied and consequences and/or support for the bully
 - Decide any changes in how the staff group may handle issues of bullying in future.
- Referring all but minor incidents that have been directly observed by a staff member and dealt with at the time to the safeguarding officer/co-ordinator to record.
- Ensuring that the safeguarding officer keeps a record of the bullying incident, the plan, and any discussions or meetings that take place following the bullying incident.

PART 2 – CODE OF CONDUCT AND PARTNERSHIP AGREEMENT

5. Sustain for Life staff and associates' Code of Conduct

This code of behaviour code outlines the conduct expected of staff and associates from Sustain for Life (SFL), and staff from other organisations and visitors who engage with children and vulnerable adults through SFL and its activities. All staff, volunteers and project visitors must sign up to and abide by this code of conduct at all times – at work and in their personal life.

5.1. Purpose

Following this code will help to protect children and vulnerable adults from abuse and inappropriate behaviour from adults. It will also help staff, volunteers and visitors to maintain the standard of behaviour expected of them and will reduce the possibility of unfounded allegations of abuse being made against them.

5.2. Upholding this code of conduct

All members of staff and volunteers are expected to report any breaches of this code to SFL's designated Safeguarding Officer/Co-ordinator under Sustain for Life Procedures for identifying and abuse and safeguarding concerns (see chapter 7). Staff and volunteers who breach this code of behaviour will be assessed under SFL's disciplinary procedures. Any breach of the code involving a volunteer or member of staff from another agency may result in them being asked to disassociate from SFL.

Serious breaches may also result in a referral being made to a statutory agency such as the police or the local authority children's social care department.

5.3. The role of staff and volunteers

When working with children and vulnerable adults all staff and volunteers are acting in a position of trust. It is important that staff and volunteers are aware that they may be seen as role models by children and vulnerable adults, and must act in an appropriate manner at all times.

5.4. "Dos"

When working with children and vulnerable adults, it is important to:

- Follow Sustain for Life's safeguarding policy and procedures at all times.
- Value and take children's and vulnerable adults' contributions seriously, actively involving them in planning activities wherever possible.
- Ensure any contact with children and vulnerable adults is appropriate and in relation to the work of the project.
- Ensure that whenever possible, there is more than one adult present during activities with children and vulnerable adults or if this isn't possible, that you are within sight or hearing of other adults.

- Respect a young or vulnerable person’s right to personal privacy.
- Be aware of high-risk peer situations (e.g. unsupervised mixing of older and younger children and possibilities of discrimination against minors).
- Develop clear rules to address specific physical safety issues relative to the local physical environment of a project.
- Recognise that special caution is required when you are discussing sensitive issues with children or vulnerable adults.
- Empower children and vulnerable adults; discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.
- Challenge unacceptable behaviour and report all allegations/suspensions of bullying or abuse.

5.5. “Don’ts”

When working with children and vulnerable adults, you must not:

- Hit or otherwise physically assault or physically abuse children or vulnerable adults.
- Develop physical/sexual relationships with children or vulnerable adults.
- Develop relationships with children or vulnerable adults which could in any way be deemed exploitative or abusive.
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive.
- Make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and vulnerable adults.
- Behave physically in a manner which is inappropriate or sexually provocative.
- Sleep in the same room or bed as a child or vulnerable adult with whom you are working.
- Do things for children or vulnerable adults of a personal nature that they can do for themselves.
- Condone, or participate in, behaviour of children or vulnerable adults which is illegal, unsafe or abusive.
- Bully anyone who is a beneficiary of SFL, other staff, associates or members of a partner organisations
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- Discriminate against, show differential treatment, or favour particular children or vulnerable adults to the exclusion of others.
- Make inappropriate promises to children and vulnerable adults, particularly in relation to confidentiality.
- Allow children or vulnerable adults to engage in sexually provocative games with each other.
- Stand aside when you witness inappropriate actions inflicted by children on other children because it is frequent and commonplace.
- Let children and vulnerable adults have your personal contact details or contact them through social networking sites.
- Misuse images in any format whether online, in printed material or other medium.
- Rely on your reputation or that of the organisation to protect you.
- This is not an exhaustive or exclusive list. The principle is that staff should avoid actions or behaviour which may constitute poor practice or potentially abusive behaviour.

It may sometimes be necessary to do things of a personal nature for children or vulnerable adults, particularly if they are very young or disabled. These tasks should only be carried out with the full understanding and consent of the child/vulnerable adult and/or their parents/carers and with the utmost discretion.

It is also important to note that since Sustain for Life may be funding the projects, some of the people that you meet may try to do things to please you even when these are not necessarily in the best interests of all concerned. If you are ever in any doubt, please consult the Safeguarding Officer/Co-ordinator.

Sustain for Life Partner safeguarding agreement and checklist

5.6. Sustain for Life's partnership commitment

Sustain for Life commits to ensuring:

- We will work with our partners to achieve compliance and competence around child safeguarding, including the provision or exchange of resources such as our child safeguarding policy and procedures and relevant training
- There is a clear agreement on each party's responsibility in relation to reporting and responding to child safeguarding concerns using the relevant authoritative structures
- Partners understand that the termination of the partnership agreement with SFL is a matter of last resort.

In practical terms, SFL will:

- Introduce SFL's Safeguarding Policy and Procedures to prospective project partners to ensure clear understanding on requirements, expectations and implications between both parties.
- Agree with each partner on any activities – and associated timeframe – that partners may need to carry out to ensure Safeguarding compliance.
- Ensure that SFL's Safeguarding Requirements checklist is complete, satisfactory and returned with each partner's first interim report

5.7. Safeguarding Requirements

Sustain for Life requires that partners disclose their compliance with the following safeguarding standards in order to receive their grant. We understand that some small partners may not score highly against the required standards, in this case Sustain for Life commits to working with our partners to build capacity in the necessary areas over the course of the grant.

Topic	Standard	Score: (Green/Amber/Red)
Processes and procedures	A child safeguarding policy is in place	
	A Code of Conduct is in place for staff and users	
	A mechanism is in place for receiving and responding to complaints from children	
	All staff have undergone a background check before hiring to ensure their suitability to work with children and in line with any national regulatory requirements	
Equality and non-discrimination	Children using the service do not experience discrimination because of differences arising out of gender, age, disability, religion, ethnicity, cultural background, language or other personal factors	
Child participation	Children have an opportunity to contribute their views to the running of the service	
	Children's wishes are sought and taken into account in any decisions which directly affect them	
Staff experience, training and support	Staff receive training relevant for their role and appropriate to national qualifications, where they exist	
	Staff receive on-going training, supervision and support specific to their role	
Privacy and records	An appropriately screened private place is available for interviews or meetings with children where possible	
	All records or case notes are securely stored	
	Staff maintain the confidentiality of children's personal and case information	
Sharing information	A procedure for reporting concerns and sharing information is in place	

See Appendix 3 for Sustain for Life Partner Safeguarding Checklist and Safeguarding Agreement

PART 3 – Governance and accountability framework

6. Sustain for Life’s safeguarding governance and accountability framework

6.1. Sustain for Life’s commitments

- We will ensure that our safeguarding policies and procedures include clear lines of governance and accountability.
- We will ensure that all staff and associates understand their roles and responsibilities when it comes to safeguarding.
- We will ensure that named safeguarding officers and focal points have the necessary training and support in order to carry out their roles.
- We will ensure that all safeguarding progress, performance and lessons learnt are reported to key stakeholders and included in Trustee meeting minutes.
- We will update our safeguarding policies and procedures when necessary, for example if lessons are learned, when new legislation is enacted and as we grow.
- We will review our safeguarding policies and procedures as a minimum every year and have them formally evaluated by an external evaluator/auditor every three years.

6.2. Designated responsibilities

6.2.1. Staff and Board responsibilities (SFL UK)

	Responsibility	Action
Police Checks and references	Executive Team	Ensure that all new UK employees who are project facing and are likely to have direct contact with children and/or vulnerable people at work have a police background check and confirmed and positive references before they are offered jobs
	Executive Team	Maintain a spreadsheet of compliance with this practice and ensure that the reference numbers of checks and testimonials from references are placed in their personnel file as evidence.
Safeguarding policy and procedures and Code of Conduct	Executive Team	Ensure that all new UK employees, associates and visitors receive a copy of the Safeguarding Policy and Procedures and Code of Conduct. They must read and sign the policy to show that they are aware of and agree to act in accordance with the Policies. For project implementing partners, that they have a robust safeguarding policy
	Executive Team	Must ensure that all associates in their area of responsibility are informed of and have signed up to SFL’s Safeguarding Policy and applicable local procedures while working for the organisation. In addition, that associates sign up to either the organisation’s Code of Conduct or to guidance on appropriate behaviour towards children that is appropriate to their engagement with the organisation and is developed by the manager using the Code of Conduct as a guide.
	Executive Team	Maintain a spreadsheet of compliance with this practice and ensure that signed copies of the Safeguarding Policy and Procedures are placed in their personnel file as evidence.
Training	Executive Team	Ensure that all new employees and trustees receive child safeguarding policy training as part of their induction programme, and all staff receive child safeguarding training which is relevant and appropriate to their engagement with the organisation.
	Executive Team	Maintain a spreadsheet of compliance with this practice.

.	Board of Trustees	Should ensure that each implementing country office has in place local procedures that are consistent with SFL's Safeguarding Policy to respond to incidents of child abuse. Local procedures should be developed with assistance of local advisers in accordance with the local law. Local procedures should be made available in local languages and child-friendly formats where applicable.
Safeguarding environment	The Safeguarding officer/coordinators	Must ensure that children and families with whom the organisation works are aware of the safeguarding policy and procedures, so that they know what behaviours they can expect from staff, associates and visitors and whom to report any concerns.
	Board of Directors and all managers	Must ensure that protective measures which guide the implementation of the safeguarding policy and procedures are fully embedded within their areas of responsibility as it applies to them.
Support	Safeguarding focal points (see 8.6)	Must ensure that those who have reported child safeguarding concerns or are accused of child abuse are given appropriate care, support and protection in dealing with all aspects of the case including any safety concerns and potential reprisals which may arise from the incident or from the reporting of such concerns.

6.2.2. Trustee level responsibilities

Our trustees commit to always acting in the best interests of our beneficiaries and ensure they take all reasonable steps to prevent harm to them. New and existing Trustees who are likely to visit SFL projects will be subject to a criminal record check and the same procedures that we apply to all of our staff.

Our trustees are responsible for:

- Ensuring that those benefiting from, or working with, our charity, are not harmed in any way through contact with it and have a legal duty to act prudently and all reasonable steps within their power are taken to ensure that this does not happen.
- Identifying what the relevant law is, how it applies to our organisation, and how to comply with it where appropriate.

Our trustees will ensure that there is always:

- A clear line of accountability for the provision of services designed to safeguard and promote the welfare of children.
- A senior board level lead to take leadership responsibility for the organisation's safeguarding arrangements as well as a designated safeguarding officer/co-ordinator and where the staffing structure allows a deputy.
- A culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services.
- Arrangements which set out clearly the processes for sharing information, with other professionals as and where appropriate in the relevant countries.
- Safe recruitment, induction, supervision and training practices for all staff and volunteers working with children and vulnerable adults.
- Clear policies, in line with requirements with the countries where we are incorporated and registered for dealing with allegations against people who work with children.

Trustees will:

- Review the safeguarding element of the risk register annually.
- Review the safeguarding policies and procedures on a biennial basis.
- Commission independent review of the safeguarding policies' and procedures every three years.

Safeguarding Officer/Co-ordinator role description

6.2.3. Purpose of the role

Although everyone has a role to play in ensuring that children and vulnerable adults are safe. Sustain for Life's Safeguarding Officer/Coordinator's will take the lead role in ensuring that appropriate arrangements are in place for keeping children and vulnerable adults safe and promoting their safety and welfare through our programmes and activities.

The Safeguarding Officer is responsible for the day-to-day implementation, supervision and monitoring of the Safeguarding policy and procedures.

6.2.4. Duties and responsibilities include:

- Maintaining an up to date policy, procedures and administrative systems.
- Ensuring that relevant staff and/or volunteers are aware of and follow the procedures, including implementing safe recruitment procedures.
- Advising the trustees on safeguarding and child protection issues.
- Maintaining contact details for local social services and police.

6.2.5. If there is a concern, the Safeguarding Officer will:

- Be the first point of contact for any concerns or allegations, from children or adults, ensuring that confidentiality is maintained in all cases.
- Decide on the appropriate action to be taken, in line with the organisation's procedures and in conjunction with the person in charge.
- Keep the trustees informed as necessary.

6.3. Board and Trustee level safeguarding focal points

The board and Trustee level safeguarding focal points will be consulted by the Safeguarding Officer/Co-ordinator in the instance of:

- Allegations against staff or volunteers
- Safe recruitment of senior staff and trustees
- Disciplinary proceedings that follow on from safeguarding concerns about members of staff and volunteers
- Complaints
- Examples of whistleblowing
- Safeguarding audits, reviews and inspections– whether internal or external
 - Risk management

6.4. Safeguarding monitoring

6.4.1. The Safeguarding register

The Safeguarding Officer/Co-ordinator will be responsible for producing a report for the Board of Trustees on a six-monthly basis giving a detailed audit of individuals who have been involved in safeguarding issues, if any.

The Safeguarding Officer/Co-ordinator will monitor the Safeguarding Register, and keep up-to-date details of who has received safeguarding training at the Country level.

6.5. Named safeguarding focal points, officers and co-ordinators:

The following staff are the designated safeguarding focal points and officers:

6.5.1. SFL UK focal points

- Ultimate responsibility: Trustees: Chair Nick Tarsh
- Safeguarding focal point at Trustee Level: Trustee, Karen McHugh

- Safeguarding focal point at Trustee Level: Trustee, Massimo Gini
- Safeguarding Co-ordinator: Executive Director

The safeguarding focal points and officers also make up the members of the safeguarding group (see S. Procedures for identifying and reporting abuse and safeguarding concerns (see chapter 9)

PART 4 – Procedures

7. Sustain for Life Procedures for identifying and reporting abuse and safeguarding concerns

This procedure applies to any paid member of staff or associate who may be concerned about the safety and protection of a child or vulnerable adult.

7.1. Purpose

The purpose of this procedure is to ensure that all staff and associates understand what to do if they have a concern that a child or vulnerable adult is in need of protection.

7.2. Understanding different types of abuse

The following types of abuse could be identified by a staff member or associate:

7.2.1. Physical abuse

Physical abuse is violence causing injury or occurring regularly. It happens when:

- a child or vulnerable adult is hurt or injured by being hit, shaken, squeezed, thrown, burned, scalded, bitten or cut.
- someone tries to drown or suffocate a child or vulnerable adult
- someone gives a child or vulnerable adult poison, alcohol or inappropriate drugs
- someone fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult.
- In some cases the injuries will be caused deliberately. In others they may be accidental but caused by the child or vulnerable adult being knowingly put at risk.

7.2.2. Sexual abuse

Sexual abuse occurs when someone uses power or control to involve a child or vulnerable adult in sexual activity in order to gratify the abuser's own sexual, emotional or financial needs or desires. It may include:

- forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the child is aware of what is happening.
- encouraging children or vulnerable adults to behave in sexually inappropriate ways.
- showing children or vulnerable adults pornographic material or involving them in the production of such material.
- involving children or vulnerable adults in watching other people's sexual activity or in inappropriate discussions about sexual matters.

7.2.3. Emotional abuse

Emotional abuse is persistent or severe emotional ill-treatment of a child or vulnerable adult that is likely to cause serious harm to his/her development. It may include:

- persistently denying the child or vulnerable adult love and affection
- regularly making the child or vulnerable adult feel frightened by shouts, threats or any other means
- hurting another person or a pet in order to distress a child or vulnerable adult
- being so over-protective towards the child or vulnerable adult that he/she is unable to develop or lead a normal life
- exploiting or corrupting a child or vulnerable adult, eg by involving him/her in illegal behaviour

- conveying to a child or vulnerable adult the message that he/she is worthless, unlovable, inadequate, or his/her only value is to meet the needs of another person. This may or may not include racist, homophobic or other forms of abuse.

7.2.4. Neglect

Neglect involves persistently failing to meet a child's or vulnerable adult's physical, psychological or emotional needs. It may include:

- failing to ensure that a child's or vulnerable adult's basic needs for food, shelter, clothing, health care, hygiene and education are met.
- failing to provide appropriate supervision to keep a child or vulnerable adult out of danger. This includes lack of supervision of particular activities or leaving a child or vulnerable adult alone.

The different types of abuse above may either be picked up by you or their existence may be disclosed to you by another person directly or through a complaint. Remember that your guiding principle is that the safety of the child or vulnerable adult is always the most important consideration.

7.3. Identifying a concern about abuse yourself

Recognising the abuse of children and vulnerable adults can be complicated even for the most experienced of carers so great care must be taken when addressing it. The signs and symptoms of abuse can be very obvious or hardly recognisable, and abuse can be perpetrated by other children or vulnerable adults. Be aware of new threats from online methods of abuse.

7.3.1. Symptoms of abuse

Some symptoms in children and vulnerable adults which could increase the suspicion of abuse include:

- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- sexually explicit language or actions
- a sudden change in behaviour (eg. becoming very quiet, withdrawn or displaying sudden outbursts of temper)
- a change observed over a long period of time (eg. the child or vulnerable adult losing weight or becoming increasingly dirty or unkempt)
- a general distrust and avoidance of adults, especially those with whom a close relationship would be expected
- an unexpected reaction to normal physical contact
- difficulty in making friends or abnormal restrictions on socialising with others
- suicide attempt
- pregnancy

7.4. Disclosure of abuse

Ways that abuse might be brought to your attention:

- A child or vulnerable adult might make a direct disclosure about him or herself.
- A child or vulnerable adult might offer information that is worrying but not a direct disclosure.
- Another person might disclose about abuse that a child or vulnerable adult is suffering or at risk of suffering.
- A member of staff might be concerned about a child's appearance or behaviour or about the behaviour of a parent or carer towards a child or vulnerable adult.

- You may receive an anonymous or non-anonymous complaint.

Any allegation or concern regarding the abuse of a child must be treated seriously and in a fair and reasonable manner for all concerned. Particular care should be taken in regard to confidentiality and the sharing of information with appropriate people.

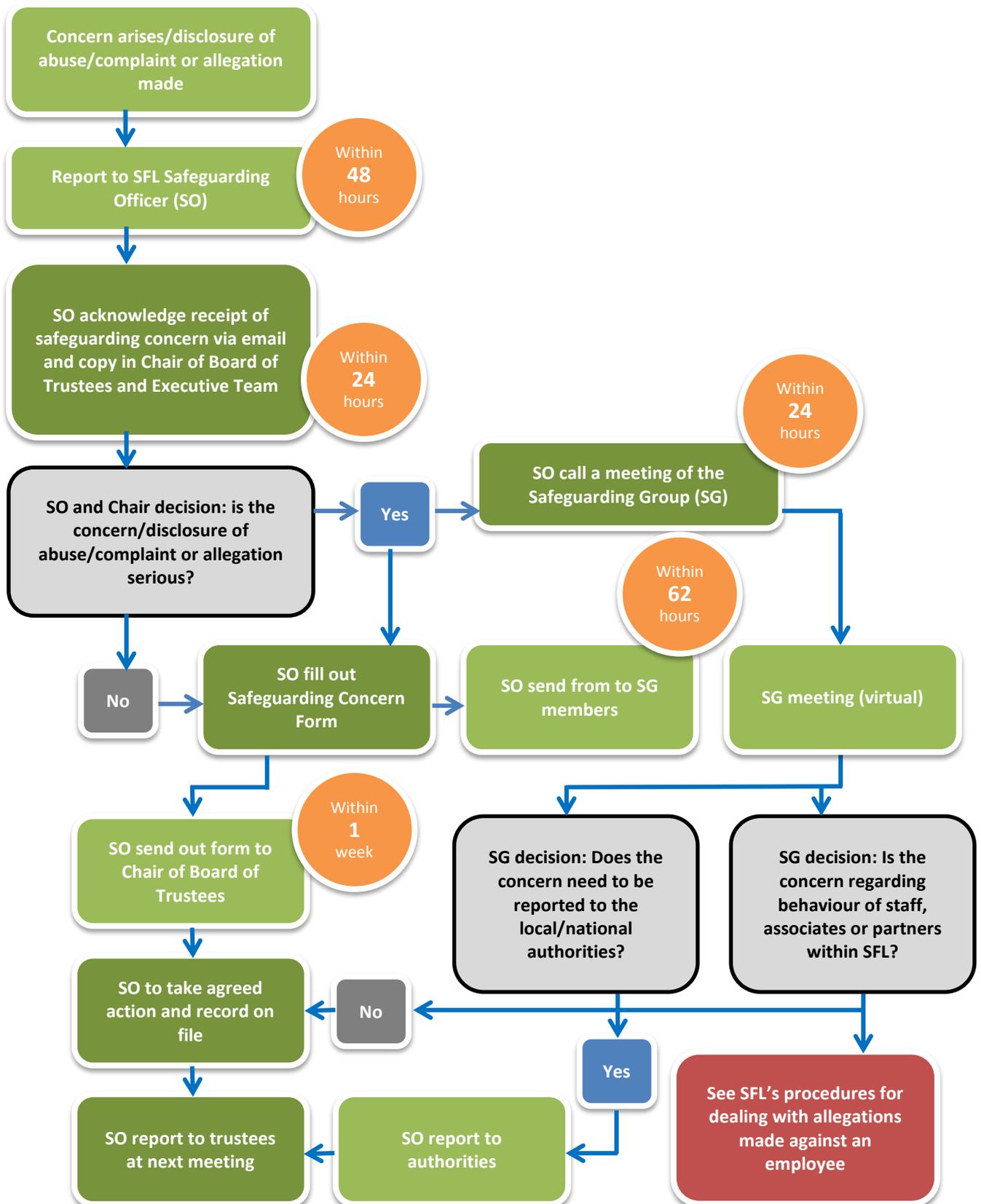
7.5. Reporting procedure

All witnessed, suspected or alleged violations of Sustain for Life's Safeguarding Policy will be reported to the designated Safeguarding Officer/Co-ordinator as soon as possible and at least within 24 hours in line with the below flow chart. The Safeguarding Officer will take appropriate action to protect the person/persons in question from further harm and others in the organisation during and following an incident or allegation.

Talking to someone who has told you that he/she or another individual is being abused

- Reassure the child or vulnerable adult that telling someone about it was the right thing to do.
- Tell him/her that you now have to do what you can to keep him/her (or the subject of the allegation) safe.
- Let the child or vulnerable adult know what you are going to do next and who else needs to know about it.
- Let him/her tell his or her whole story. Don't try to investigate or quiz the child or vulnerable adult, but make sure that you are clear as to what he/she is saying.
- Ask the child or vulnerable adult what he/she would like to happen as a result of what he/she has said, but don't make or infer promises you can't keep.

If the child or vulnerable adult is in immediate danger or needs emergency medical attention and is with you, remain with him/her and call the appropriate authorities.



7.6. Recording and handling information by the Sustain for Life Safeguarding Officer

7.6.1. Reporting to the authorities

If the SFL Safeguarding Officer/Co-ordinator suspects that a child or vulnerable adult may have been the subject of any form of physical, emotional or sexual abuse or neglect, the allegation must be referred as soon as possible to the appropriate authorities or the police who have trained experts to handle such cases. The Safeguarding Officer/Co-ordinator and staff should not ask questions which may jeopardise any formal investigation but listen to and keep a record of anything that you are told regarding the situation or that you have observed and pass the information on to the statutory authorities (see Appendix 2 for reporting form).

7.6.2. Sharing information

All information must be treated as confidential and only shared with those who need to know. If the allegation or suspicion concerns someone within Sustain for Life, only the child's parents/carers, the person in charge (unless they are the subject of the allegation) and the relevant authorities should be informed. If the alleged abuse took place outside the scope of a Sustain for Life project the police or social care authority will decide who else needs to be informed, including the child's parents/carers. It should not be discussed by anyone within the organisation other than the person who received or initiated the allegation and, if different, the person in charge.

Confidential information must be stored securely. It is recommended that it should be retained for at least three years and destroyed by secure means, eg. by shredding or burning.

7.7. Concerns or allegations regarding Sustain for Life staff or volunteers

If a staff member or volunteer breaches the safeguarding policy or code of conduct, the matter must be brought to the attention of the Safeguarding Officer/Co-ordinator and the Procedure for dealing with allegations made against an employee (see Chapter 10) must be followed. If necessary, the allegations or concerns will be reported to the appropriate authorities.

Under no circumstances should any individual attempt to confront an alleged abuser or deal with the situation alone.

7.8. Statutory authorities

If Sustain for Life is contacted by the police or other authority concerning information received or a complaint made by or about an employee or volunteer, the full safeguarding decision procedure (in the diagram above) must be followed. Any staff or associates who receive such a complaint must consult the Safeguarding Committee before further action is taken.

8. Procedure for dealing with allegations made against an employee

This procedure outlines what you should do if a child protection allegation is made against an adult working for or involved in Sustain for Life or a partner organisation.

8.1. Aims

The aims of this procedure are:

- To ensure that children and vulnerable adults working with SFL and its partners are protected and supported following an allegation that they may have been abused by an adult from within SFL or an SFL partner.
- To ensure that there is a fair, consistent and robust response to any allegations made, so that the risk posed to other children or vulnerable adults by an abusive individual is managed effectively.
- To facilitate an appropriate level of investigation into allegations.

- To ensure that SFL continues to fulfil its responsibilities towards members of staff, volunteers or trustees who may be subject to such investigations.
- To ensure that individuals are able to continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin.

8.2. Application

This procedure applies to:

- Any member of staff, volunteer or trustee to whom an allegation of abuse has been made, that involves another member of staff, volunteer or trustee
- Anyone in a managerial position (including the safeguarding officer/co-ordinator and trustees) who may be required to deal with such allegations and manage investigations that result from them.

8.3. What to do if an allegation is made or information is received

8.3.1. If the person under allegation is working with children now:

If this is the case, the concern needs to be discussed immediately with the person's line manager an/or nominated trustee and the safeguarding officer/co-ordinator. Then the named person should, in a sensitive manner, remove the staff member involved in the allegation from direct contact with children.

It should then be explained to the person, in private, that there has been a complaint made against him/her, although the details of the complaint should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with children. It may be best, under the circumstances, for the person to return home on the understanding that the SFL person dealing with the matter or safeguarding officer/co-ordinator will telephone him/her later in the day.

The information provided to him/her at this stage will need to be very limited. This is because discussions need to take place first with other agencies that may need to be involved, such as the police, the local government or other NGOs.

If the person is a member of a trade union or a professional organisation, he/she should be advised to make contact with that body. Arrangements by SFL should also be made for the member of staff or volunteer to receive on-going support in line with the responsibilities the organisation has towards his or her welfare.

8.4. Conducting an investigation

Once any urgent necessary steps have been taken, attention can be given to dealing with the full implications of the allegations.

There are up to three possible lines of enquiry when an allegation is made:

1. A police investigation of a possible criminal offence
2. Enquiries and an assessment by the local authority social care department about whether a child or vulnerable adult is in need of protection
3. Investigation by an employer and possible disciplinary action being taken against the person in question. This includes implementing a plan to manage any risk posed by the individual to children and young people in the workplace until the outcome of the other investigations and enquiries is known.

8.5. Reporting an allegation or concern

If the allegation is made by a child, vulnerable adult or family member to a member of SFL staff, or if a member of SFL staff observes concerning behaviour by a colleague at first hand, this should be reported immediately

to the staff member's manager or person to whom they are responsible and the safeguarding officer/co-ordinator.

If a staff member has received an allegation or observed something of concern about their own manager, the staff member should report the allegation or concern to the person more senior to their manager. If the person who is the subject of the concern is the safeguarding officer/co-ordinator the matter should be reported to the safeguarding officer/co-ordinator's nominated Safeguarding trustee.

8.6. When to involve the local authorities

When an incident arises that may require Sustain for Life to inform the local authority, the Safeguarding Co-ordinator/Officer should immediately contact other members of the Safeguarding Group to obtain advice as to whether this is a matter that should be referred on to the authorities because a person:

- may have behaved in a way that has harmed or may have harmed a child
- has possibly committed a criminal offence against or related to a child
- has behaved towards a child in a way that suggests that he/she may be unsuitable to work with children.

This should also happen if the individual has volunteered the information him/herself.

There should be discussion between the local authority and SFL's safeguarding officer/co-ordinator to share information about the nature and circumstances of the allegation, and to consider whether there is any evidence to suggest that it may be false or unfounded.

If there is any reason to suspect that a child has suffered, or be likely to suffer, significant harm and there are no obvious indications that the allegation is false, SFL will make an immediate referral to the appropriate body. It should be asked from the outset that the local authority shares any information obtained during the course of their enquiries with SFL if it has any relevance to the person's employment.

8.7. Dealing with a criminal offence

If there is reason to suspect that a criminal offence may have been committed the local authority may contact the police. In which case the safeguarding officer/co-ordinator and the any other representative from SFL should cooperate fully with any discussion involving the police and should ask for similar cooperation from the police in terms of the sharing of information relevant to the person's employment.

Discussions with the police should also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place, or whether disciplinary action must wait until the criminal process is completed.

8.8. Talking to the person who is the subject of the allegation

The person at the centre of the allegation should be informed as soon as possible after the initial consultation with the local authority. The police and local authority may have views on what information can be disclosed to the person.

Only limited information should be given to the person in question, unless the investigating authorities have indicated that they are happy for all information to be disclosed or unless there is no need for involvement from these statutory agencies.

The safeguarding officer/co-ordinator will need to keep in close communication with the local authorities and any other agencies involved in order to manage the disclosure of information appropriately.

8.9. Taking disciplinary action

As any proven allegations would be considered gross misconduct, they may be dealt with under Sustain for Life's disciplinary procedures. The fact that a member of staff resigns during an investigation must not hinder the process, and disciplinary procedures should still be completed and the outcome recorded on the staff member's Human Resources file.

If the initial allegation does not involve a possible criminal offence, the safeguarding officer/co-ordinator and SLF-responsible person for the person at the centre of the allegation should still consider whether formal disciplinary action is needed.

If the local authority has undertaken any enquiries to determine whether a child or vulnerable adult are in need of protection, the safeguarding officer should take account of any relevant information from these enquiries when considering whether disciplinary action should be brought against the person at the centre of the allegations.

The following timings should be kept to wherever possible, depending on the nature of the investigation:

- If formal disciplinary action is not needed, other appropriate action should be taken within three working days.
- If disciplinary action is required, and can be progressed without further investigation, this should take place within 15 days.
- If SFL decides that further investigation is needed in order to make a decision about formal disciplinary action, the safeguarding officer/co-ordinator should discuss with the local authority the possibility of this investigation being done by an independent person to ensure that the process is objective. Whether or not the investigation is handled internally or independently, the report should be presented to the safeguarding officer/co-ordinator within 10 working days.
- Having received the report of the disciplinary investigation, the safeguarding officer/co-ordinator in consultation with the focal Trustee should decide within two working days whether a disciplinary hearing is needed.
- If a hearing is needed, it should be held within 15 working days.
- The safeguarding officer/co-ordinator should continue to liaise with the local authority during the course of any investigation or disciplinary proceedings and keep the focal Trustee up-to-date. If a criminal investigation is required, it may not have been possible to make decisions about initiating disciplinary proceedings or about the person's future work arrangements until this is concluded. The named person should then either liaise with the police directly or via the local authority to check on the progress of the investigation and criminal process.
- The safeguarding officer/co-ordinator should request that the police inform SFL straight away if the person is either convicted of an offence or acquitted or, alternatively, if a decision is made not to charge him/her with an offence or to administer a caution.

If disciplinary action is taken against any UK member of staff the Safeguarding Officer/co-ordinator must refer to the UK DBS if they:

- dismissed them because they harmed a child or adult
- dismissed them because they might have harmed a child or adult otherwise
- were planning to dismiss them for either of these reasons, but the person resigned first

8.10. Managing risk and supporting the person at the centre of the allegation

The first priority of SFL must always be the safety and welfare of children and vulnerable adults. However, as an employee or volunteer, the person who is the subject of the allegation has a right to be treated in a fair, sensitive and non-judgemental manner and to have his or her privacy respected as far as this preserves the safety of the child and other children.

Information about the allegation must only be shared on a need to know basis with those directly responsible for supervising and managing the staff member or volunteer. Any other information (for example, explanations to other staff members as to why the person is not at work or working to different arrangements) should be agreed and negotiated with the individual concerned.

8.10.1. Support

Support to the named person will be as follows:

- If the person is a member of a trade union or a professional organisation, he/she should be advised to make contact with that body as soon as possible after being informed that he/she is the subject of an allegation.
- Arrangements should also be made for him/her to receive support and information about the progress of the investigation.

8.10.2. Suspension

The possible risk of harm to children and young people presented by the person who is the subject of an allegation needs to be carefully managed both during and after any conclusion to the investigation processes following the allegation. This means that SFL may need to consider suspending the person if there is cause to suspect that a child may be at risk of significant harm, or if the allegation is serious enough to warrant investigation by the police, or if it is so serious that it could lead to dismissal. However, a decision to suspend should not be taken automatically, as there may be other ways of managing any risk presented by the person.

The situation should be discussed fully between the safeguarding officer/co-ordinator, the individual's manager or person to whom they are accountable at SFL and the local authorities. The conclusions of the discussion should also be carefully documented.

Grounds for suspension should be clearly set out if this is the conclusion. If suspension is not the conclusion, then a clear plan should be made as to how any possible risk posed by the individual is to be managed. This could involve, for example, changes to the person's duties so that they do not have direct contact with children, and/or increased levels of supervision whilst at work.

8.10.3. Returning to work

If it is decided, once the case has been concluded, that a person who has been suspended or who has taken sick leave due to the stress induced by the allegation, is able to return to work, the safeguarding officer/co-ordinator and the person to whom the person at the centre of the allegations is accountable to should consider how best to support the individual in this process.

A plan to facilitate a return should be drawn up in consultation with the individual him/herself, and should take into account the need to manage any remaining child protection risks and also to support the person concerned after what will have been and will remain a very difficult experience.

If the allegation is found to be without substance or fabricated, SFL should consider referring the child in question to the children's social care department for them to assess whether he/she is in need of services or whether he/she may have been abused by someone else. If it is felt that there has been malicious intent behind the allegation, (name of group/organisation) should discuss with the police whether there are grounds to pursue any action against the person responsible.

8.10.4. Resignation

SFL should not enter into compromise agreements with individuals who resign following the conclusion of investigations into allegations made against them, and should always comply with its statutory obligations to share information about the individual in the interests of protecting children and young people.

8.11. Recording

Keeping a record of the investigation:

- All those involved in dealing with the allegation should keep clear notes of the allegations made, how they were followed up, and any actions and decisions taken, together with the reasons for these.
- These notes should be compiled gradually as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside.
- The notes should be kept confidentially on the file of the person who is the subject of the allegation. If there are no reasons not to do so, a copy of the records should be given to the individual.
- The notes should be held on file for a 10 year period, whether or not the person remains with SFL for this period.

8.12. References

This procedure was developed with guidance from the following documents:

- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (2013) HM Government. UK
- The Children's Workforce Development Council (2009) Recruiting Safely: Safer recruitment guidance helping to keep children and young people safe, CWDC. UK

9. Procedure for sharing information with other organisations

9.1. Information sharing procedure

Staff and volunteers may find themselves wishing to or being asked to share information of a confidential nature about children and families using their programmes.

This may be because:

- The staff member/volunteer is of the view that someone in the family may benefit from additional support
- Someone from another agency has been in touch and wishes to know something about the family's involvement with SFL or an SFL partner
- Someone in the family has asked to be referred for further help
- The staff member/volunteer is concerned that a child may be at risk of significant harm, or an adult in the family may be at risk of serious harm, or there is a serious crime that may have been committed or about to be committed involving someone in the family.

Before sharing the information, the staff member/volunteer should record what it is that they wish to share, who they wish to share it with, and the purpose of doing so. If the reason involves risk of harm to a child, young person or adult, then Sustain for Life Procedures for identifying and reporting abuse and safeguarding concerns (see chapter 9) should be referred to immediately. In any other situation, these guidelines should continue to be followed.

9.2. Consent

The staff member/volunteer should first consider the issue of consent to the information being shared. If the information relates to an adult who is capable of giving consent, and such consent has not already been obtained, then the staff member/volunteer should seek the consent of the person concerned unless doing so would place someone at risk of harm or would impede the prevention or investigation of a serious crime. If the information relates to a child or young person, then the matter should be discussed with the child or young person if they are capable of understanding it. If, in the view of the staff member or volunteer, the child or young person is competent to give their consent (for this see information about Gillick competence on the

Safe Network website) then this should be sought unless the urgency or seriousness of the situation prevents this, as suggested above.

When seeking consent, the staff member/volunteer should ask for this in writing if possible, unless this is inappropriate. If written consent is not possible, then the staff member/volunteer should record that it has been obtained verbally. Before being asked to give consent, families and children/young people should be made aware of what information is to be shared, the purpose of doing so, with whom it will be shared and the consequences of its not being shared.

The staff member/volunteer should then pass the information on to the agreed agency without delay (ie within one week of consent being obtained or sooner if circumstances require). This should be done within the following parameters of good practice, and recorded:

- Make a conscious decision on how much information to share based on the public interest – which, in this case, will normally be the interests of the child.
- Ensure that it is shared securely – this means checking who exactly is receiving the information, and that they are doing so in a confidential environment.
- Make sure that the information you share is as accurate and up to date as possible; if you are unsure of any of it but still decide to share it, then make sure that the recipient is aware of any areas of uncertainty.
- Distinguish clearly between fact and opinion.
- Ask what the recipient is going to do with the information and whether they will need to pass it on to anyone else.
- Inform the person who is the subject of the information that it has been passed on, unless it would be unsafe or inappropriate to do so.

If consent is withheld, or if it cannot be sought because of a risk of harm to someone, or because of the risk of a serious crime being committed, or because of the investigation of a serious crime being compromised, then the staff member/volunteer should consult with their manager or nominated trustee on whether the information should be shared without consent.

In such a situation, the manager and the staff member/volunteer in consultation with the nominated trustee needs to weigh up whether sharing the information is in the public interest. 'Public interest' is a term used in the UK Data Protection Act but not clearly defined. It can refer to the interests of the whole community, or to a group within the community, or to individuals. Normally it would be considered to be in the public interest for the confidentiality of service users to be protected, but this may be outweighed by the public interest involved in protecting people from harm, preventing crime or disorder, or promoting children's welfare by making sure that they have access to safe and effective care. The manager, in consultation with the member of staff/volunteer, needs to decide whether, on balance and in this particular case, the public interest is served by information being shared without consent.

If the decision is not to share the information, this must be recorded and the reasons for not sharing must be stated. If the decision is to go ahead and share the information, then this must be done by either the manager or the staff member/volunteer (it must be clearly understood between them who will do it) within one week of the decision being made (or sooner if circumstances require). The parameters of good practice outlined under point 5 should be used to inform the process of sharing the information.

The manager and/or nominated trustee and staff member/volunteer should record the decision to share the information without consent, the reasons for doing so, and the details of how this was done. This record must be signed by both

10. Family and Child complaints procedure

10.1. Overview

This complaints procedure aims to assist children, young people, parents, carers and others with regards to representations (including complaints) made to Sustain for Life or our Partners and the services we provide.

It describes the processes by which we aim to resolve complaints and seeks to ensure that young people, or others who make a complaint on their behalf, have their concerns resolved swiftly and where possible, by staff immediately concerned in service delivery.

For ease of reference throughout this document, the people described above are referred to as young people and their parents.

10.2. What is a complaint?

We understand a complaint to be:

An expression of dissatisfaction about a service (whether that service is provided directly by Sustain for Life or by a contractor or partner) that requires a response. There is no difference between a 'formal' and an 'informal' complaint. Both are expressions of dissatisfaction that require a response.

10.3. What may be complained about?

A complaint may arise as a result of:

- An unwelcome or disputed decision
- Concern about the quality or appropriateness of a service
- Delay in decision making or provision of service
- Delivery or non-delivery of service
- Quantity, frequency, charge or cost of a service
- Attitude or behaviour of staff

10.4. Anonymous complaints

Anonymous complaints will be reviewed and the country manager or SFL staff member with responsibility for the service/programme in question will decide if any action needs to be taken. If there is a safeguarding concern it will be referred to the safeguarding officer/co-ordinator.

10.5. Time limits for making a complaint

SFL will not consider complaints where the events occurred more than 12 months before the complaint was made. This is because it is often difficult or sometimes impossible to investigate the issues in a full and thorough manner, as the relevant staff may no longer be in post. However, requests for a matter to be considered out of time under this procedure will be positively received if it can be demonstrated that there:

- Are genuine reasons for the complaint not being made within one year;
- If there is sufficient access to information/individuals involved to enable an effective and fair investigation.

Where it is decided that a complaint will not be considered, the complainant will be informed in writing of the reasons for this decision.

10.6. Confidentiality and consent

All information disclosed about a complainant must be confined to that which is relevant to the investigation of the complaint and only disclosed to those people who have a demonstrable need to know.

The child or vulnerable adult's express consent is not required to access information about him/her for the purpose of investigating a complaint that they raised themselves.

If a complaint is raised by their parent(s) or representative; and the child is over the age of 12 years, their written consent should be sought allowing that person to have personal information about them. Parents often feel that as their child is under the age of 18, they have an automatic right to know all information about them. They can be insistent on seeing the files or records even if the young person refuses consent or having detailed information in a complaints response. Particular care must be taken where the child's records contain information provided in confidence by or about a third party.

Only information which is relevant to the complaint should be considered for disclosure and then only in line with SFL's procedure for sharing information with other organisations (see chapter 11). It must not be disclosed to the child, vulnerable adult or their representative unless the person providing the information has expressly consented to the disclosure. Disclosure of information provided by a third party also requires the express consent of that person.

10.7. Timescales

Complaints will be responded to within two weeks by the country manager or relevant SFL staff member/trustee.

11. Whistle blowing procedure

11.1. Aims and purpose of this procedure

The aim of this procedure is to provide a clear and transparent way for anyone who works for Sustain for Life to raise genuine concerns about acts of wrongdoing or malpractice in the workplace. It also aims to ensure that any concerns are dealt with effectively and in a timely fashion.

This procedure provides managers with steps to deal with allegations, ensuring that staff and volunteers are not penalised for raising genuine concerns, even if those concerns prove to be unfounded. It also provides the means for taking disciplinary action against anyone who is found to have raised false concerns with malicious intent.

The procedure does not apply to child protection concerns or allegations about a member of staff or volunteer. Concerns or allegations of this nature should be dealt with following the Sustain for Life Procedures for identifying and reporting abuse and safeguarding concerns (see chapter 9)

11.2. Raising a concern

11.2.1. What to do if you wish to raise a concern about malpractice

- Speak to the safeguarding officer, your manager, another colleague (preferably someone you work with closely) or if this is not possible, an SFL trustee. If your concern relates to your manager or the person to whom you are accountable at SFL, you should speak to the nominated Trustee for whistleblowing. If you choose to speak to a colleague, with prior reference to you, he/she may nominate another responsible person to handle your concern.
- Your manager or nominated trustee will arrange to meet with you as soon as possible to discuss your concern. This meeting can take place away from the workplace if necessary.
- You will be told at the meeting, or as soon as possible afterwards, what action will be taken to address your concern. It may not be possible to tell you the full details of the outcome, as this could relate to confidential third party information. If no action is to be taken in relation to your concern, you will also be informed of this fact and given the reasons why.

If you do not want the person you have concerns about to know your identity, you should make this clear to the responsible person you have confided in at the earliest opportunity. Every effort will be made to respect your wishes, but it cannot be guaranteed that your identity will not be disclosed. If this is the case, you will be informed and any issues you may have about this will be discussed with you.

If you need support in raising your concern, you may bring a work colleague or trades union representative with you to the meeting with the responsible manager.

11.2.2. What to do if someone raises a concern with you about malpractice

If someone tells you they are concerned about the actions of another staff member or volunteer, you should arrange to meet him/her as soon as possible. If you are not the person's manager, you should establish why he/she has chosen to discuss the concern with you. You may suggest that the person speaks to another responsible SFL staff or board member if you wish, but should not refuse to hear what the person has to say.

You should approach the situation sensitively, recognising the discomfort that the person may feel. Offer to meet him/her away from the office if he/she wishes, and allow him/her to bring a work colleague or trades union representative to the meeting. You should also remind the person with the concern about other sources of support available to him/her. Some are listed at the end of this document.

If the person reporting the concern wants his/her identity to be kept confidential, you should explain that this will be done if possible, but that it may not be achievable. Make notes of your discussions with the individual, and check the accuracy of your notes with him/her.

11.3. Responding to a concern

11.3.1. Deciding what action to take:

Once you have established the nature of the concern, it may be of a relatively minor nature and you may decide to resolve it informally.

If the concern appears more serious, you must consider first whether any immediate action is needed to protect children or a vulnerable adult. If so, you should refer to Sustain for Life Procedures for identifying and reporting abuse and safeguarding concerns (see chapter 9)

If you are not the manager of the person who is the subject of the concern, you should refer the matter to the person's manager or person to whom they are accountable, who will decide what action to take.

11.3.2. Conducting an investigation

Unless the matter is relatively minor and can be dealt with informally, the responsible manager should arrange for an investigation to be completed as swiftly as possible. The investigation should also be demonstrably thorough and impartial.

The scope of the investigation will be determined by the nature of the concern. Witnesses may need to be interviewed and records may need to be scrutinised. It is also possible that advice may be needed from someone with specialist knowledge in human resources.

Once the investigation is completed, a report should be produced summarising the nature of the concern, the investigation process and the outcome, including specific recommendations. Take measures to preserve the anonymity of the person who raised the concern, if this has been his/her wish. If the concerns are not upheld, this should also be made clear.

If the concern is upheld and the person at the centre of it is found to have been culpable or remiss in some way, the report's recommendations should be carried out using a clear plan of action. The plan may include

the use of disciplinary action, training, coaching, counselling, the implementation of new policies or procedures for the whole workforce, or a referral to the Independent Safeguarding Authority.

If it becomes apparent during the course of the investigation that a criminal offence may have been committed, the police should be informed. Your own investigation may have to be suspended on police advice, if they decide that they need to become involved.

The person who raised the concern should be informed of the outcome, but not the details of any disciplinary action. It may be appropriate for the person who raised the concern to be offered support or counselling.

If the concern is unfounded and the person who raised it is found, through the process of investigation, to have acted maliciously or out of a desire for personal gain, it may be appropriate to consider disciplinary action against him/her.

11.3.3. Recording the concerns

The responsible manager should make accurate notes of each stage of the process, including the discussions during meetings, regardless of whether the concern is dealt with formally or informally.

Copies of these notes should be given to the person who is the subject of the concern. The person who raised the concern should also be given copies of notes from his/her discussion.

Notes made during the investigation and the report of the investigation, together with any notes relating to the outcome, should be kept on the file of the person at the centre of the concern. If it was requested, these notes should not reveal the identity of the person who reported the concerns.

Country using this policy and procedure: **United Kingdom**

Safeguarding Contacts

Ultimate responsibility	Trustees	Chair Nick Tarsh
Safeguarding focal point at Trustee Level	Trustee	Karen McHugh
Safeguarding focal point at Country Board Level	Board Member	Massimo Gini
Safeguarding Coordination	Executive Team	Paul Adams, Sophie Hutchings

Relevant government safeguarding authority	Council safeguarding service/child safeguarding team where the safeguarding concern takes place	
Contact	London Safeguarding Children Board, Westminster	Telephone: 020 7641 4000; Out of hours: 020 7641 6000 accesstochildrenservices@westminster.gov.uk
Relevant external safeguarding organisation	NSPCC/Childline	0800 1111
Local Police details	London Metropolitan Police Child Protection	Telephone: 101 or online.met.police.uk Emergency telephone number: 999