

# EACD Safeguarding and Child Protection Policy

## ***Introduction***

**Safeguarding** is the responsibility that an organisation has to ensure that their employees and volunteers, partners, vendors, operations and programmes do no harm to children, young people or vulnerable adults (See section on definitions below; together referred to as 'vulnerable people' under this policy); that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organisation has about the safety of vulnerable people within the communities in which they work, are dealt with and reported to the appropriate authorities. It is also the responsibility that the organisation has for protecting its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

**Child protection** is a central part of but not separate to safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse.

Over recent years, there has been increasing recognition of the way in which children, young people and vulnerable adults can be at risk of discrimination, neglect, abuse and exploitation by those who are in positions of trust and power over them, including through international activities. As a consequence, there has been a significant increase in the efforts made by organisations to ensure that no harm results from the contact their employees, volunteers and other representatives have with their target populations or communities.

Through their work, EACD employees, employees of partner organisations, and volunteers may engage with young people and vulnerable adults either directly or indirectly. EACD recognises it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people and vulnerable adults, including those with whom we work and those in the communities where EACD work is undertaken.

## ***Purpose***

The purpose of this policy and associated procedures is to provide clarity to ALL on how they should engage with children, young people and vulnerable adults when working for, on behalf of, or in partnership with EACD. It is also to help us make sure that employees, volunteers and other representatives are protected.

It is intended to help us to have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which we operate and thereby increase accountability in this crucial aspect of our work.

This policy constitutes EACD's global policy. Whilst it is recognised that local legislation may vary from country to country, this policy identifies our minimum standards and may exceed the requirements of local legislation. Any breach of this policy will be treated as a disciplinary matter, which may result in immediate termination of employment, contract or membership, withdrawal of volunteer status, and reporting to the police, relevant regulatory authority or other body.

## ***Definitions***

**Abuse** - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent



treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

**Discriminatory abuse** – abuse motivated by a vulnerable person’s age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

**Financial or material abuse** - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**Neglect** - the persistent failure to meet a vulnerable person’s basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person’s basic emotional needs.

**Physical abuse** – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

**Psychological abuse** - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person’s developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

**Sexual abuse** - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

**Child** – EACD regards a child as anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

**Vulnerable person/people** – for the purposes of this policy this is an umbrella term which covers children, young people and vulnerable adults.

**Vulnerable adult** - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.



**Youth or young people** - individuals aged 15 to 25 (15 to 35 in some countries) – EACD recognises that this group spans the categories of ‘children and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

## **Scope**

This policy is mandatory for all EACD employees, volunteers and members worldwide. For the purposes of this policy, ‘employee’ is defined as anyone who works for or on behalf of EACD, either in a paid or unpaid capacity. This therefore includes directly employed staff, trustees, committee members, contractors, employees and volunteers of sub-contractors, agency workers, consultants, volunteers, interns and all visitors to EACD work programmes and offices.

It also covers implementing partners whom we fund, and who we expect to work under the policy as a condition of their involvement with EACD.

This policy demonstrates how EACD will meet its legal obligations and reassure volunteers, employees, members, partners and members of the public:

- a) On what they can expect EACD to do to protect and safeguard vulnerable people.
- b) That they are able to safely voice any concerns through an established procedure.
- c) That all reports of abuse or potential abuse are dealt with in a serious and effective manner.
- d) That there is an efficient recording and monitoring system in place.
- e) That employees, volunteers, sub contracted agencies and partners receive appropriate induction on safeguarding.
- f) That a robust ‘safe’ recruitment procedure is in place.

There are additional procedures in place that apply to those that work or have contact with, either directly or indirectly, children, young people or vulnerable adults or who live in communities alongside them.

## **Policy Statement**

EACD has zero tolerance against abuse and exploitation of vulnerable people. EACD also recognises that safeguarding is everyone’s responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we work and those in the communities in which we live.

EACD works to the following key principles to protect vulnerable people:

- Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- EACD will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or vulnerable adult is at risk or is actually harmed.



- EACD will ensure that employees and volunteers are inducted in our Safeguarding Standards (see Appendix) and procedures as a key part of the recruitment and on boarding process.
- EACD will ensure that all partners are informed and in compliance with our Safeguarding Standards. When working with or through partners or sub contracted agencies, EACD will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- EACD recognises that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact.
- EACD respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a need to know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- EACD commits to monitoring the implementation of the safeguarding policy. This policy will be reviewed every three years and earlier if necessary.
- Cultural sensitivity; EACD seeks always to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. We recognise that there are many different ways of thinking and taking care of vulnerable people and making sure they are protected. It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work. As an international organisation, we endorse the United Nations Convention on the Rights of the Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and article 19 which accords equal rights to protection for children from abuse. Every child matters everywhere in the world. Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

Designated safeguarding officers are available to give guidance on how to interpret the policy and its application to the local context.

## ***Responsibilities***

### **All**

All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

### **All people working with EACD will:**

- Read, understand and adhere to the EACD Safeguarding and Child Protection Policy and the EACD Code of Conduct
- Strive to promote a zero tolerance approach to discrimination, sexual harassment and abuse in all working environments
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty
- Place the safety and welfare of children and vulnerable people above all other considerations
- Report any concerns they may have about the welfare of a child or vulnerable person



- Report any concerns they may have about the behaviour of a EACD representative in relation to safeguarding
- In a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why. If possible ensure another adult is in sight and that the child or young person knows another adult is around

#### **All people working with EACD will not:**

- Sexually harass, assault or abuse another person
- Physically harass, assault or abuse another person
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe
- Develop, encourage or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive
- Act in ways that may be violent, inappropriate or sexually provocative
- Agree with a child to keep a secret which has implications for their safety or the safety of other young people.

#### **Supervisors**

Supervisors (i.e. the person nearest to the respondent in terms of line responsibility) at all levels are responsible for ensuring employees, volunteers, consultants, visitors and partner organisations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

#### **EACD Ethics and Compliance committee**

The members of the EACD Ethics and Compliance committee will act as designated safeguarding officers, and are responsible for handling reports or concerns, about the protection of vulnerable people, appropriately and in accordance with the procedures that underpin this policy. In their function as designated safeguarding officers, the EACD Ethics and Compliance committee is responsible for:

- monitoring and recording safeguarding concerns
- ensuring referrals to the relevant authorities happen without delay
- updating safeguarding training for all staff and volunteers
- ensuring this policy is reviewed at least every 3 years or earlier if necessary
- ensuring it is implemented throughout the organisation and safeguarding training is given where appropriate
- ensuring monitoring and recording procedures are implemented

#### **EACD Executive Committee**

The EACD Executive Board is responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone linked with EACD is equipped and supported to meet their responsibilities.



## **EACD General Management Committee**

The General Management Committee holds ultimate accountability for this policy.

### ***Procedure Overview***

#### **Recruitment and Selection:**

- Safe recruitment and vetting processes are followed for all volunteers, employees, consultants and partners
- Where an employee, volunteer or partner is engaged in 'regulated activity' (direct work with vulnerable individuals), a criminal background check can be undertaken as part of the recruitment process. (For more detailed guidance, contact a designated safeguarding officer and/or supervisor.)
- All EACD employees and volunteers must sign and abide by this safeguarding policy and the Code of Conduct. The code sets out the standards of practice we expect of employees and volunteers - in terms of professional competence, integrity, acting as a representative and in safeguarding - which support our vision, mission and values. (For more detailed guidance, refer to the Code of Conduct).

#### **Induction and Support:**

- Support and training on safeguarding will be provided to all employees and volunteers on:
  - What they should do in the event of a disclosure
  - What to do if they have concerns about the welfare of a child or vulnerable adult
  - How to recognise signs of abuse
  - What to do if they have concerns about a EACD employee, volunteer, or employee of a partner organisation
  - Where to go for advice and support within the organisation
- Ensure that clear processes for reporting and dealing with safeguarding concerns and incidents are widely communicated, regularly reviewed and consistently applied. Where allegations are made about an employee or volunteer, careful consideration must take place about the appropriateness of the person continuing to work with EACD.
- Ensure that EACD has a format for carrying out and implementing risk assessments at all levels of the organisation.
- Train and support the designated safeguarding officers in their work and in any action they may need to take in order to protect vulnerable people.

#### **Data Protection**

Ensure that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialised child welfare or law enforcement agency in relation to a safeguarding incident.

#### **Minimum Standards**

Where employees or volunteers are contracted by other employers, or when working with partners, sub-contracted agencies, EACD will brief them on our safeguarding policy and ask for information on how the organisation works to protect vulnerable people and ensure that they meet our Safeguarding Standards.



## **Social Media**

Specifically relating to protection of children, young people and vulnerable adults, EACD will:

- Only use names and images, including photographs and recordings, of children, young people or vulnerable adults which are respectful and not expose them to further vulnerability (not degrading or showing sexual images of children naked or partially clothed).
- Reproduce images and use names of children only where we have the written permission of their parents / guardians using a consent form.
- Reproduce images and use names of young people and vulnerable adults only where we have their written permission or that of their parents/guardians, whichever is the most suitable.
- Make clear to vulnerable people and their families that agreement to providing information or images is not a condition of involvement in EACD activities and programmes.

## **Raising and responding to concerns**

EACD places a *mandatory obligation* on all employees, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation vulnerable people or which suggests this policy may have in any other way been breached. It is not the responsibility of the employees or volunteers to decide whether or not abuse has taken place, however, concerns should be raised with an individual's supervisor or a designated safeguarding officer who will initiate the procedure for dealing with suspected or actual incidents of abuse. (For details for reporting concerns see below).

Designated Safeguarding Officers are responsible for ensuring that the reporting procedure is followed so that suspected or actual cases of abuse are responded to appropriately and consistently, and referred to the relevant statutory authority.

To ensure that all such situations are handled appropriately and effectively:

- Reports must be made to the EACD Ethics and Compliance Committee, and decisions and actions taken (For details, see below).
- EACD is not an investigative authority. It is essential that referrals are made to the relevant law enforcement agency to ensure that appropriate protection and support is given to the vulnerable individual, and that any evidence is collected in accordance with the law.
- All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse), and be shared on a strictly 'need to know basis', that is, access must be necessary for the conduct of one's official duties.
- Where a EACD employee or volunteer is the subject of an investigation, the lead designated safeguarding officer will lead the case.

## **Internal procedures for dealing with inquiries, concerns or complaints: four stages**

### **Stage 1 - Resolution by relevant supervisor**

The aim of this option is for a resolution of the matter to be achieved in a just, prompt and confidential manner. Staff or Committee members in supervisory roles have a responsibility to deal with safeguarding as part of their role in maintaining a productive environment in which to work or study, and through promoting proper standards of conduct.

They have a responsibility to:

- ensure that all are aware of appropriate and acceptable standards of behaviour
- make known the EACD's policies, and names and locations of the Ethics and Compliance Committee Members



- take early corrective action to deal with behaviour which may not be appropriate
- monitor the workplace and study environment so they become aware of any inquiry, concern or complaint that may be likely to arise

For the purpose of this process the supervisor shall be the person nearest to the respondent in terms of line responsibility.

For example:

RESPONDENT	SUPERVISOR
Member of EACD	EACD Secretary
Staff member	Senior Staff member <i>or</i> EACD Secretary
Sub-committee member	Chair of sub-committee
General Management Committee member	Chair of EACD

Care should be taken by the supervisor not to pre-judge either party or to dismiss a matter as trivial. The supervisor may utilise a range of strategies in resolving the matter whilst ensuring that principles of procedural fairness are observed, such as:

- provide sufficient opportunity for the relevant person to present their case
- if appropriate, inform the respondent of the substance of the allegations and provide adequate opportunity to respond
- give reasonable notice to all parties of any interviews or meetings regarding the matter
- discuss the matter through separate interviews with the relevant persons, or through a joint meeting with both parties if they agree
- provide mediation to resolve the complaint, if appropriate

At any Stage of this process, the supervisor may seek advice and assistance from the Ethics and Compliance Committee with respect to the procedures and proposed strategies. Any person involved may request an Ethics and Compliance Committee Member to attend any meetings to provide advice and ensure fair process is followed. The Ethics and Compliance Committee Member's role does not extend to acting as an advocate for either party involved. The supervisor or Ethics and Compliance Committee Member may request the assistance of other Ethics and Compliance Committee members. If there is a legitimate concern or complaint, and the matter is resolved, the supervisor will follow up with the relevant person(s) to ensure that there have been no further incidents.

If the matter is directly related to the immediate supervisor Stage 1 would be omitted. In this case, or if the matter has not been resolved, the matter may be referred to the EACD Ethics and Compliance Committee, as set out below.

## **Stage 2 - Resolution by Ethics and Compliance Committee**

Initial enquiries or any concern could be made to any of the Ethics and Compliance Committee Members. An Ethics and Compliance Committee Member who feels unable or unwilling to deal with a particular enquiry should refer the person/party to the Chair of the Ethics and Compliance Committee.

The role of an Ethics and Compliance Committee Member is to:

- be a first point of contact for anyone who wish to make inquiries, who has a complaint, or who want simply to sound out a concern
- listen with respect and empathy, at all times ensuring confidentiality
- assist the person to clarify the situation and their feelings
- identify the nature of the matter and advise about both internal and external ways of dealing with the matter



- provide advice on EACD policy and procedures and the possible stages involved
- discuss note taking and recording of the matter and provide advice on this to the relevant person(s)
- caution to be careful regarding who to inform of the matter given the possible risk of defamation and aggravation of the problem
- if appropriate and necessary, accompany the person to preliminary meetings associated with the matter;
- refer the person to the relevant supervisor if the person wishes
- advise that the matter may be withdrawn at any stage without prejudice

All approaches to an Ethics and Compliance Committee Member will be treated in confidence and Ethics and Compliance Committee Members will not discuss a case with a third person without the knowledge and consent of the persons involved, other than in accordance with these procedures.

If the matter has not been resolved, the matter may be referred to the EACD General Management Committee. This referral to the General Management Committee should occur only after initial discussion of available options with the Ethics and Compliance Committee.

### **Stage 3 - Complaint resolution by EACD General Management Committee**

Where resolution of the matter has been unsuccessful in Stages one and two, it will be referred to the EACD General Management Committee. Referral may be made by the relevant person or the Ethics and Compliance Committee only after following Stage 1 and/or Stage 2. The EACD General Management Committee will investigate any concern, complaint or inquiry in accordance with the procedures outlined in Stage two.

If the matter is found to be substantiated, the EACD General Management Committee will undertake appropriate action or refer the matter to the Annual General Meeting. If a satisfactory resolution is not achieved the matter is referred to the Annual General Meeting.

### **Stage 4 - Formal complaint to the Annual General Meeting**

When the previous Stages have failed, a formal referral is made to the Annual General Meeting, who may constitute a Review Panel comprising the Chair of the Ethics and Compliance Committee, and one or more nominees of the Annual General Meeting if deemed necessary. The Review Panel will report its findings and recommendations to the Annual General Meeting who will determine appropriate action. The Annual General Meeting's determination will be final.

**Note:** It is anticipated that the majority of complaints will resolved in Stages 1 or 2. Stage 1 is not appropriate where concern or complaint is against supervisor.

**Note:** Any complaint of victimisation will be treated in the same manner as a complaint of discrimination or harassment. 'Victimisation' includes any unfavourable treatment of a person who has been involved with a discrimination or harassment enquiry or complaint. Unfavourable treatment could include adverse changes in the working environment, denial of training, denial of promotion, and exclusion by peers.

**Note:** If the concern or complaint is found to be vexatious, disciplinary procedures may be taken against the complainant.

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## Appendix 1: EACD Safeguarding Standards

This standard framework is from the Keeping Children Safe “Child Safeguarding Standards” and adapted for use for EACD. Each standard can be met in whole, in part or not met.

Standard		Potential evidence of standard being met
1. Policy	1.1 The organisation has a clear safeguarding policy that seeks to prevent harm to children, young people and vulnerable adults	<ul style="list-style-type: none"> <li>• A copy of the policy, signed by the General Management Committee</li> <li>• EACD employees, volunteers and partners are informed about the policy</li> </ul>
	1.2 Policies are publicised to staff, beneficiaries and wider communities	<ul style="list-style-type: none"> <li>• Policy or summary translated into local languages</li> <li>• Examples of ways the policy has been promoted, including to children, young people or other community members as necessary</li> </ul>
2. People	2.1 The organisation places clear responsibilities and expectations on its staff and associates and supports them to understand and act in line with these	<ul style="list-style-type: none"> <li>• Job descriptions with clear expectations on those with contact with vulnerable people</li> <li>• Job descriptions for EACD long-term volunteer/employee include details of any contact</li> </ul>
	2.2 Key individuals are designated at different levels with clearly defined roles and responsibilities.	<ul style="list-style-type: none"> <li>• Clear responsibilities for a Designated Safeguarding Officer at appropriate level</li> </ul>
	2.3 There are written guidelines for appropriate and with vulnerable people inappropriate behaviour	<ul style="list-style-type: none"> <li>• A written code of conduct; evidence of this being shared to staff and volunteers</li> </ul>
	2.4 There are appropriate learning opportunities to develop and maintain the necessary attitudes, skills and knowledge to keep vulnerable people safe.	<ul style="list-style-type: none"> <li>• A copy of training plans, course attendance records and course evaluations.</li> <li>• Evidence of induction for EACD volunteers to relevant safeguarding issues</li> </ul>
3. Procedures	3.1 Organisations carry out local mapping exercises which provide information on the legal, social welfare and child protection arrangements.	<ul style="list-style-type: none"> <li>• Legal requirements are included in policies</li> </ul>
	3.2 Safeguarding risks and mitigation strategies are incorporated into existing risk assessment processes at all levels.	<ul style="list-style-type: none"> <li>• Risk assessments include appropriate and relevant risks</li> <li>• Evidence of mitigation strategies implemented</li> <li>• Risk assessments shared with EACD</li> </ul>
	3.3 Safeguarding issues are integrated into activity/programme design, delivery and evaluation	<ul style="list-style-type: none"> <li>• Evidence of safeguarding issues in project/activity proposals, plans, needs</li> </ul>
	3.4 There are procedures for responding to assessments, etc. safeguarding concerns arise	<ul style="list-style-type: none"> <li>• A copy of a concern/allegation management</li> </ul>



4. Accountability	4.1 Implementation of safeguarding policies and procedures is monitored	<ul style="list-style-type: none"> <li>• Copies of reporting to committees, partners, etc.</li> <li>• Copies of minutes of meetings to review practice</li> </ul>
	4.2 Learning from issues captured and informed future policy and procedure reviews	<ul style="list-style-type: none"> <li>• Incident reports produced</li> </ul>
	4.3 Policies and procedures reviewed at least every three years	<ul style="list-style-type: none"> <li>• Evidence of review in annual plans / strategies</li> </ul>

