Safeguarding Policy

Agreed by Board of Trustees: March 2021

Review Schedule: Once a year or (if sooner) in light of material changes to safeguarding legislation or guidance

Next Review Date: March 2022

Owner (Responsibility): Chief Executive Officer

Introduction

SCI Foundation (SCIF) is committed to running its operations with transparency, empowerment and inclusion. SCIF believes that everyone we interact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. SCIF takes a zero-tolerance approach to abuse and exploitation within our organisation and we work closely with our partners to implement safeguarding best practice on projects that they deliver.

All SCIF staff and associated personnel must act in accordance with this policy. In addition, SCIF staff and associated personnel must sign and be held accountable to SCIF’s code of conduct. SCIF will apply appropriate disciplinary measures to staff found in breach of policy and/or code of conduct.

This policy does not form part of any contract of employment or contract for services and we may amend it at any time.

Partners will be expected to have their own safeguarding policies, procedures and codes of conduct in place. If a partner does not have appropriate safeguarding measures in place, SCIF will support them to develop (or uphold) their own safeguarding policies, procedures and codes of conduct.
Purpose

The purpose of this policy is to set out how SCIF works to protect people, particularly children and adults at risk, from harm. In particular, this policy:

- lays out the commitments made by SCIF to provide a safe and protective environment, as far as reasonably possible, for people who interact with SCIF or our partners;
- informs SCIF staff and associated personnel of their responsibilities in relation to safeguarding;
- sets out how SCIF will respond to safeguarding concerns; and
- outlines how we work with partners to promote and facilitate wider safeguarding best practice.

This policy does not cover:

- sexual harassment in the workplace – this is dealt with under SCIF’s Anti Bullying and Harassment Policy; or
- safeguarding concerns in the wider community not perpetrated by SCIF staff or associated personnel or partners.

Glossary of Terms

Associated personnel – any person (other than SCIF employees or workers) who has a contract to work for, or provide services to, SCIF or who is representing SCIF in any capacity. This includes, but is not limited to, interns, consultants, trustees and volunteers.

Beneficiary of Assistance - People participating in treatment or survey activities supported by SCI Foundation.

Child – a person below the age of 18.

Harm – psychological or physical harm and any other action or inaction by another person (whether deliberate or unknowing, and whether contained in a single act or repeated acts) that causes infringement of an individual’s rights.
**Partner** – delivery partners, sub-contractors, and organisations that receive funding from SCIF. This includes, but is not limited to, government ministries and departments, and national and international non-government organisations (NGOs).

**Psychological harm** – emotional or psychological abuse including, but not limited to, humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

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

**Safeguarding** – the steps SCIF takes to protect people (including children and at risk adults) from harm that might arise from interaction with our organisation, and the steps we take to work proactively with partners to facilitate safeguarding best practice.

**Sexual abuse** – actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

**Sexual exploitation** – actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This includes human trafficking and modern slavery.

**Survivor** – a person who has been harmed, abused or exploited. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive, however, it is the individual’s choice how they wish to identify themselves.

**At risk adult** – sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness, and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.
SCIF’s principles of safeguarding

SCIF is committed to the seven key principles that should underpin all safeguarding functions, actions and decisions, as set out by the UK Care Act 2014 and keeping children safe, which applies to both children and adult safeguarding:

1) **Do No Harm** – reduce the potential for interventions to cause harm

2) **Empowerment** – support and encourage individuals to make their own decisions

3) **Protection** – support those in greatest need, including as a result of abuse or neglect

4) **Prevention** – take action before harm occurs or risk escalates

5) **Proportionality** – the least intrusive or restrictive intervention appropriate to the risks presented

6) **Partnership** – work across services and communities to prevent, detect and report neglect and abuse

7) **Accountability** – accountability and transparency in safeguarding practice

Scope

This policy covers the following areas of safeguarding:

- child safeguarding
- adult safeguarding
- protection from sexual exploitation and abuse

SCIF is committed to addressing safeguarding in all areas through the three pillars of prevention, reporting and response.
**Prevention**

**Organisational responsibilities**

SCIF will:

- Ensure all staff and associated personnel have access to, are familiar with, and know their responsibilities within this policy.
- Work with partners to design programmes and activities which are supported by SCIF in a way that protects people from the risk of harm. This includes the way in which information about individuals in programmes we support is gathered and communicated (please refer to our communications guidelines).
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure staff and associated personnel receive appropriate training on safeguarding.
- Follow up on reports of safeguarding concerns promptly and according to due process.

**Board of Trustee responsibilities**

Safeguarding will be a standing item at meetings of SCIF’s Board of Trustees and will include:

- an update of the safeguarding task team and departmental update;
- partner reports;
- updates to the safeguarding register and overview of the number and type of safeguarding cases (with no personal identifiable information and/or explicit detail); and
- review or support with reporting safeguarding matters as serious incidents to the charity commission.

A Safeguarding Trustee will be appointed to and will:

- be part of the safeguarding committee when convened.
- support and advise the safeguarding focal persons when requested.
Staff and associated personnel responsibilities

SCIF staff and associated personnel must:

- adhere to SCIF’s code of conduct;
- familiarise themselves with this policy and apply it in their work for or on behalf of SCIF;
- contribute to creating and maintaining an environment that protects people from harm, prevents safeguarding violations and promotes the implementation of this policy;
- report any safeguarding concerns or suspicions using the procedure set out below;
- cooperate with any safeguarding investigation.

Child safeguarding

SCIF staff and associated personnel must not:

- engage in sexual activity with anyone under the age of 18;
- sexually abuse or exploit children;
- subject a child to physical, emotional or psychological abuse, or neglect;
- engage in any commercially exploitative activities with children including child labour or trafficking.

Adult safeguarding

SCIF staff and associated personnel must not:

- sexually abuse or exploit at risk adults;
- subject an at risk adult to physical, emotional or psychological, or neglect;
- subject an at risk adult to financial abuse (examples include stealing from, defrauding someone of, or coercing someone to part with money, goods and/or property).
Protection from sexual exploitation and abuse

SCIF staff and associated personnel must not:

- exchange money, employment, goods or services (including the outputs of SCIF's work) for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour;
- engage in sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Reporting

The procedure set out below provides a safe and accessible means of reporting safeguarding concerns and is available to staff, associated personnel, partners and beneficiaries of assistance. Anyone who makes a report under this procedure will be protected against any negative repercussions as a result of raising a safeguarding concern.

Any staff and associated personnel may also choose to use SCIF's Whistleblowing Policy to report safeguarding concerns.

Partners and beneficiaries of assistance can report safeguarding concerns relating to our work or the work that we fund to a member of SCIF staff or through the whistleblowing hotline SeeHearSpeakUp (see below). SCIF will also accept safeguarding reports from external sources (such as members of the public and official bodies).

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to a safeguarding concern and subsequent case management will be shared on a need to know basis only.

Records of safeguarding concerns should be kept secure at all times.

For reporting purposes, a redacted report will be used giving an outline of the complaint safeguarding concern, but without any information that would reveal the identity of the individuals involved.
How to report a safeguarding concern

SCIF staff or associated personnel who have a safeguarding concern, or who suspect or are made aware of a safeguarding concern, should report it immediately to their line manager or to the Safeguarding Focal Point.

If an individual does not feel comfortable reporting the matter to the Safeguarding Focal Point or their line manager (for example, if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other senior manager or the CEO.

Safeguarding Focal Point – safeguarding@schisto.org.uk (email accessed by three SG focal points: Joshua Oliech, Carolyn Henry and Paula Pinto Araya)

<table>
<thead>
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<th>Department</th>
<th>Line manager email</th>
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<tbody>
<tr>
<td>Programmes</td>
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<td>Policy and Communication</td>
<td><a href="mailto:y.velleman@schisto.org.uk">y.velleman@schisto.org.uk</a></td>
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<tr>
<td>CEO</td>
<td><a href="mailto:w.harrison@schisto.org.uk">w.harrison@schisto.org.uk</a></td>
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The Safeguarding Trustee can also be contacted to raise a complaint if the above mechanisms are not suitable. This is Dr Justine Frain boardsafeguarding@schisto.org.uk.

In addition to the above, an independent whistleblowing hotline is available for use by staff, associated personnel, and external parties. The hotline will accept concerns via phone, email or the webpage. Concerns can be anonymous, however, to be able to deal with the concern to the best of our ability, it is helpful to give contact information.

SeeHearSpeakUp

Tel: Global +44 1224 379 303, UK  0800 056 2539, USA  1 855 290 6405

Email: report@seehearspeakup.co.uk

Web: https://www.seehearspeakup.co.uk/sci-foundation
Response

SCIF will follow up safeguarding concerns according to our agreed policies and processes, and in line with our statutory and regulatory obligations.

SCIF will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

Working with partners

SCIF works collaboratively with partners and it is primarily our partners who work directly with children and adults at risk.

We do not design or directly implement the activities that we fund and our partners have ownership of their work. While SCIF is unable to enforce safeguarding policies or practices in our partner organisations, we recognise our duty to fund safe programmes and activities and we achieve this through the following steps.

Pre-partnership

- Partners are expected to have appropriate policies and procedures in place covering safeguarding before SCIF enters into a partnership agreement, contract, or Memorandum of Understanding (MOU).

- All partners will enter into a Service Agreement which requires the partner to commit to having in place a safeguarding policy and code of conduct that are at least as strong as SCIF’s safeguarding policy and code of conduct.

- As part of SCIF’s partner due diligence process, we will conduct a review of each partner’s policies and processes that make reference to safeguarding.

- Where partners do not have policies and procedures which are deemed essential by SCIF, appropriate safeguarding measures for the activities that SCIF supports will be developed as part of the early stages of the partnership, led by our due diligence process. While this process is taking place, the partner can adopt the SCIF code of conduct and safeguarding policy.

- Local legislation must be followed by all partners. If SCIF’s policy is more stringent than local legislation then this policy will be followed to achieve the highest standard of safety.
**During and closure of a Partnership**

Partners will receive training in safeguarding, the level of training will be determined by their roles and responsibilities, as set out in the table below.

**Training Modules**

1. Introduction to safeguarding
2. Reporting concerns
3. Safeguarding in practice
4. Developing a policy and safeguarding culture
   - Risk assessment
   - Gap analysis
   - Policy development
   - Gaining support
   - Training others and advocacy
5. Incident management and recording concerns

**Who will receive the training?**

<table>
<thead>
<tr>
<th>Job title</th>
<th>SG Training required</th>
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<tbody>
<tr>
<td>Partner Safeguarding focal person</td>
<td>All training (modules 1-5)</td>
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<tr>
<td>Full time employees of Neglected Tropical Disease (NTD) programmes</td>
<td>Introduction to safeguarding, reporting concerns, safeguarding in practice (modules 1-3)</td>
</tr>
<tr>
<td>Casual workers</td>
<td>Introduction to safeguarding and reporting concerns sessions during role training (modules 1-2)</td>
</tr>
<tr>
<td>Health professionals</td>
<td>Introduction to safeguarding and reporting concerns sessions during role training (Modules 1-2)</td>
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Supportive Planning

Each partner we work with will be given the opportunity to access supportive planning with the safeguarding team at SCIF. This will include mentoring, coaching and supportive supervision of implementation of their safeguarding plans. We will also offer a critical review of their policy and processes related to safeguarding.

Partner access to whistleblowing services

All partners and their staff or associated personnel will be able to access the SCIF whistleblowing line to report a safeguarding concern related to the work that is carried out with SCIF. If a report is made which relates to work is outside the scope of SCIF’s partnership, we will make all reasonable efforts to pass information about the concern onto the relevant organisation (if known).

SeeHearSpeakUp

Tel: Global +44 1224 379 303, UK  0800 056 2539, USA  1 855 290 6405

Email: report@seehearspeakup.co.uk

Web: https://www.seehearspeakup.co.uk/sci-foundation

Working with partners to respond to safeguarding concerns

SCIF will support partners to respond to safeguarding concerns, including providing assistance with investigations, if required, in line with the SCIF process.

SCIF will expect partners to manage and respond to safeguarding concerns effectively and in a timely manner. If a partner fails to cooperate with any investigation that SCIF deems necessary in the area of safeguarding, SCIF may decide to end the partnership.
Monitoring and evaluation
SCIF will monitor safeguarding procedures by partners through:

- Annual Reviews
- Final Reports

These will be reviewed by the Grant Manager who will pass the findings to the Safeguarding Focal Person to collate the report for the Board of Trustees.

Associated policies
The following associated policies and procedures are available on request:

- Code of conduct
- Whistleblowing policy
- Disciplinary policy
- Grievance policy
- Equality & diversity policy
- Health & safety policy
- Relationships at work policy
- IT acceptable use policy
- Communications guidelines
Appendix A

Report & Response

Flow Chart

Responsibility key

- Anyone
- Safeguarding Focal Point
- Safeguarding Committee
- CEO

Cause for Concern form is completed by the person receiving the report & shared with the SFP

Within 24 hrs

Report the concern to SCI’s Safeguarding Focal Person (SFP)

SFP alerts and convenes the Safeguarding Committee

As soon as possible

Key Decisions Taken within 24 hours:

- How to ensure the safety of those involved (stop current actual or risk of harm, and potential harm to arise from reporting)
- Whether to report to police / authorities
- Who to inform (e.g., victims’ support network)

CEO and HR contacts subject of complaint to inform and take relevant protective action

Will the case be investigated by local authorities / police?

YES: SCI cooperates with investigation

Internal Investigation conducted

NO: Alleged victims (and their trusted adult) are provided with information and support to relevant services