



**Chance for  
Childhood**

## **GLOBAL SAFEGUARDING POLICY**

<b>Policy Approved by Chance for Childhood Board</b>	<b>9<sup>th</sup> September 2020</b>
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# 1 SAFEGUARDING CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS

## 1.1 Statement of Commitment

Chance for Childhood promotes a proactive response to keeping children, young people and adults at risk safe. As such we seek every opportunity to encourage the active participation of children, young people and adults at risk as a central role in keeping themselves and others safe, and our policies and practices are developed around this concept.

In the twenty-eight years of its existence, Chance for Childhood has focused on the welfare and safety of children and we continue to recognise our fundamental duty of care towards all our beneficiaries. We also recognise that we have a duty of care to protect those that come into contact with our programmes that are over the age of 18 and at risk. As part of this responsibility, we also work to protect anyone who is in contact with Chance for Childhood from accidental harm, as well as deliberate exploitation and abuse from, and within the organisations intended for their benefit.

Additionally, Chance for Childhood specifically recognises that children and young people living with disabilities, street connections, who have been trafficked and others at-risk are especially vulnerable to abuse, exploitation, and ill-treatment at the hands of carers, other project workers and any person who has access to them. As such this policy serves as a means of rigorously maintaining proper guidelines and procedures to prevent situations that make Chance for Childhood vulnerable to enabling exploitation, abuse, and/or harbouring abusers. Chance for Childhood views safeguarding as both an organisational and an individual responsibility.

Although we recognise that the legal definition of a child varies in different countries, for the purpose of this policy, children are defined as all those under 18 years of age in accordance with the UN Convention on the Rights of the Child. An individual aged 18-25 years is considered to be a "young person".

Chance for Childhood's Safeguarding Policy aims to be inclusive of children, young people and adults at risk.

We operate a zero - tolerance policy towards exploitation and abuse.

Our policy has been developed with the help and co-operation of many of our collaborative partners to whom we are very grateful. We would like to acknowledge the following organisations' policies from which we have drawn helpful material: Child Hope, War Child, Sense International and the ABC Trust. We would also like to acknowledge the expert input from the Child Safeguarding Network Manager from Keeping Children Safe, a UK-based leading international Child Safeguarding Network.

## 1.2 Safeguarding Values

- The welfare of the children, young people and adults at risk is paramount;
- All children, young people and adults at risk have equal rights to protection from abuse and exploitation;
- All children, young people and adults at risk should be encouraged to fulfil their potential and inequalities of potential should be challenged;
- Everybody has a responsibility to support the care and protection of children, young people and adults at risk;

We will seek to safeguard children, young people and adults at risk by:

- Valuing them, listening to and respecting them
- Empowering them to speak out and challenge us when things can be better
- Sharing information about safeguarding and good practice
- Developing inclusive safeguarding practices that will include the most at risk children, young people and adults.

We are committed to an active participation in networks and initiatives to promote good safeguarding practices to facilitate mutual learning and good practice.

## 1.3 Scope

- All staff (UK and Internationally)
- All Board Members (UK and Internationally)
- All volunteers and interns (UK and International)
- All partners organisations\*
- All those visiting Chance for Childhood Offices and Partner projects including but not limited to partners, donors, corporate sponsors, Ambassadors and journalists

\*Partners who do not have a robust Safeguarding Policy or Procedures will be required to sign up to the Chance for Childhoods Safeguarding Policy and Procedures until they have such policies and procedures in place.

**NOTE: This Policy applies at all times, both within and outside working hours.**

## 1.4 Compliance

Chance for Childhood is committed to exercising legal compliance to all UK and Global Safeguarding, Child Protection, and Prevention of Sexual Exploitation and Abuse legislation and good practice.

Key Legislation in the area of Safeguarding includes but is not limited to:

United Nations Convention on the Rights of The Child (1989)

Human rights treaty which sets out the civil, political, economic, social, health and cultural rights of children. The Convention defines a child as any human being under the age of eighteen unless the age of majority is attained earlier under a state's own domestic legislation.

UK: Rehabilitation of Offenders Act (1974)

UK: Children’s Act (1989)  
UK: Adoption and Children Act (2002)  
UK: Data Protection Acts (1998 & 2018)  
UK: Female Genital Mutilation Act (2003)  
UK: Children’s Act (2004) - Strengthens the 1989 Act  
UK: Safeguarding Vulnerable Groups Act (2006)  
UK: Children and Young Persons Act (2008)

Chance for Childhood is also committed to achieving the full, ongoing implementation of the Six Core Principles relating to Sexual Exploitation and Abuse by the Inter-Agency Standing Committee (IASC) Working Group on Prevention and Response to Sexual Exploitation and Abuse.

The Principles can be read here: <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>

All Country Offices and Partners have a duty to determine specific national legislation or practice that should be included within their national policies and procedures. However, the commitments in this Policy are to be applied and adhered to across all Chance for Childhood Offices.

We recognise that our international partners and donors may have different Safeguarding legislation and Safeguarding contexts within the countries they work in. We will work with them to identify areas of development for both sides and to ensure we are compliant within all safeguarding laws and reporting requirements for a Programme and/or Partnership.

### **1.5 Distribution**

We acknowledge that to ensure this policy is implemented successfully we must commit to the distribution of the policy to all relevant parties and ensure there are accessible versions. We commit to widely promoting and disseminating our Safeguarding Policy and will make copies available and accessible to all relevant staff, partners, funders and, of course, children, young people and adults at risk.

We commit to producing the Safeguarding Policy in relevant local language versions to ensure that the policy is fully accessible and understood by all relevant parties.

We commit to ensuring partners clearly understand Chance for Childhood’s policy commitments, principles and practices.

### **Definitions, Acronyms and Abbreviations**

CEO	Chief Executive Officer
CfC	Chance for Childhood
CoC	Code of Conduct
CP	Child Protection
DBS	Disclosure and Barring Service
GSL	Global Safeguarding Lead
INGO	International Non-Governmental Organisation
PSEA	Prevention from Sexual Exploitation and Abuse

SEA	Sexual Exploitation and Abuse
SFP	Safeguarding Focal Point
SHEA	Sexual Harassment, Exploitation and Abuse
GLT	Global Leadership Team
SO	Safeguarding Officer
SP	Safeguarding Policy

## **Safeguarding**

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

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

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires us to proactively identify, prevent and guard against all risks of harm, exploitation and abuse and have mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and protect those accused until proven guilty.

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

## **Categories of Harm (United Nations)**

### **Physical Abuse**

Actual or attempted injury of a child where there is knowledge or reasonable suspicion that the injury was deliberately inflicted (including self-harm) or knowingly not prevented.

### **Sexual Abuse**

The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.).

### **Emotional Abuse**

The failure to provide for the child's basic emotional needs (including lack of affection and loving care) to the extent that there is a severe effect on their behaviour and development.

### **Neglect**

Failure to provide for the child's essential needs (food, clothing, cleanliness, shelter) to the extent that it affects the physical health and emotional development of the child. Includes failure to secure appropriate medical treatment.

### **Exploitation**

The physical, mental or emotional abuse or neglect of a child, young person or adult at risk for financial or other benefit.

### **Sexual Exploitation**

Actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

### **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).

### **Harassment**

Any inappropriate conduct which has the purpose or effect of offending or humiliating others. This conduct may be of a verbal, non-verbal or physical nature and intended to hurt, degrade, intimidate, humiliate or embarrass, or to create a climate of hostility, intimidation or discomfiture. Harassment usually supposes a series of incidents.

### **Bullying/Peer Harm**

The inappropriate application of pressure or abuse (see above definitions) by children and young people on their peers to the extent that it causes distress to the recipient.

### **Direct contact with children**

Being in the physical presence of a child or children in the context of the organisation's work, whether contact is occasional or regular, short or long term.

### **Indirect contact with children**

Includes, but is not limited to, having access to information on children in the context of the organisation's work, such as children's names, locations (addresses of individuals or projects), photographs and case studies. It also includes organisations which fund direct work with children as this also has an impact on children, and therefore confers a safeguarding responsibility upon donor organisations.

### **Survivor**

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

### **At Risk Adult**

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

## **2 SAFEGUARDING STRUCTURE, ROLES AND RESPONSIBILITIES**

2.1 In line with the UK Charity Commission guidelines, Chance for Childhood recognises that the Board of Trustees are responsible for ensuring that those benefiting from, or working with the charity, are not harmed in any way through engaging with Chance for Childhood and our partners. Chance for Childhood recognises that the Board have a legal duty to take all reasonable steps within their power to ensure that this does not happen.

2.2 Chance for Childhood has appointed a Global Safeguarding Lead (GSL) in the UK and Safeguarding Officer (SOs) in each country office. The role of the GSL and SOs is to be the organisational representatives and first points of contact for all matters related to

safeguarding, including SEA. The responsibilities of the GSL include: ensuring the Safeguarding Policy (SP) remains up to date; ensuring that all organisational activity is undertaken in compliance with the SP and all related procedures; scheduling of required training for staff and Board members; representing the organisation at safeguarding groups and forums; being the key point of contact for all appointed SOs and SFPs. The GSL will report to the GLT and Board on any safeguarding matters.

2.3 The Global Leadership Team (GLT) are responsible for resources being available to ensure safeguarding responsibilities are upheld. The GLT will support the GSL and SOs to create an organisational culture where safeguarding is at the heart of all Chance for Childhood's work, decision making and strategy. Safeguarding is a standing agenda item at GLT meetings, annual strategy and review meetings and is included within programme evaluations.

2.4 In the absence of the GSL or SOs, the CEO or Co-CEO takes full responsibility for safeguarding issues. The GSL, SOs and CEOs receive adequate training and are fully responsible for the implementation, monitoring and review of Chance for Childhood's Safeguarding Policy.

2.5 All staff and volunteers at Chance for Childhood are expected to be aware of, and compliant with their roles and responsibilities under this policy. Staff and volunteers should ensure that the safeguarding policy is implemented across the organisation and request support/guidance when required and inform the GSL or SO of any concerns. Staff and volunteers must attend appropriate training.

2.6 Each Partner Organisation of Chance for Childhood must have a dedicated Safeguarding Focal Point (SFP). This person must not be the Director of any of the programmes in question.

#### **Safeguarding Focal Point (SFP)**

All our partners must ensure that they have appointed someone to act as their Safeguarding Focal Point. It is necessary that this person speaks the local language and has attended training in safeguarding. This person must not be the Director of the organisation.

Broad areas of responsibility for the Safeguarding Focal Point include:

- Supporting the Board of Trustees and Staff Members in implementing the Safeguarding Policy;
- Acting as the first point of contact for staff on all safeguarding issues;
- Maintaining an up-to-date list of local specialist child welfare, health and law enforcement contacts;
- Liaising closely with Chance for Childhood's relevant Safeguarding Officer and Global Safeguarding Lead on all safeguarding matters.

2.7 All monitoring and evaluation project reports must include a section on safeguarding.

### 3 RECRUITMENT

Chance for Childhood is committed to ensuring that safeguarding is a key element of our recruitment process as part of an active risk management procedure.

- 3.1 All job advertisements will state that Chance for Childhood has a Safeguarding Policy, which the successful applicant will be expected to comply with.
- 3.2 Interview candidates selected are asked to read the policy in advance of their interview and are asked questions specific to Safeguarding and PSEA during the interview.
- 3.3 We request two references from all prospective employees. References from family members are not accepted.
- 3.4 All new employees are required to undergo an enhanced DBS or relevant local police clearance check. Two members of staff are assigned specifically to ensure that this is undertaken having undergone the necessary training in data protection. Chance for Childhood's commitment is such that the CEO is the final authority on all matters relating to personnel recruitment. They are also required to read and sign a statement of commitment to the Safeguarding Policy and Code of Conduct prior to the commencement of their role.
- 3.5 All new interns and volunteers are also expected to read and sign a statement of commitment to the Safeguarding Policy and Code of Conduct prior to the commencement of their placement. Any interns or volunteers who will work directly with beneficiaries undergo an enhanced DBS check or relevant local police clearance check.
- 3.6 All new trustees will read and sign a statement of commitment to the Safeguarding Policy and Code of Conduct before attending their first meeting. All Board members will be required an enhanced DBS or local relevant police clearance check.
- 3.7 All external consultants of Chance for Childhood are required to read and sign a statement of commitment to the Safeguarding Policy and Code of Conduct before the commencement of their assignment. Further, those consultants who are required to work directly with partners and beneficiaries will undergo an enhanced police clearance check. Where the consultant does not live in the UK, they are required to obtain a local alternative from the relevant authorities in their country of residence.

#### **See Appendix 1 for the Code of Conduct**

The Code of Conduct will be displayed on the Chance for Childhood website and within the offices of all our programmes (unless they have their own specific CoC).

### 4 ORGANISATION AND PARTNER TRAINING

- 4.1 All new members of staff, volunteers and Trustees must attend an induction into Chance for Childhood's Safeguarding Policy and necessary procedures by the GSL or the

relevant SO. This must take place at the earliest possible opportunity and certainly within one month of their appointment.

4.2 The GSL and/or the relevant SO delivers refresher training to all Chance for Childhood staff and regular volunteers on an annual basis.

4.3 The SOs receive refresher training from the GSL annually and actively participate in training courses and groups to ensure that they are up to date with new developments in good practice.

4.4 Programme based Safeguarding Focal Points with support from the SOs and GSL are responsible for orienting children, young people and adults at risk involved in Chance for Childhood's projects in all aspects of Chance for Childhood's Safeguarding Policy and Procedures. Training for children, young people and adults should involve the use of child-friendly and/or accessible materials, such as pictures and flowcharts.

4.5 A review of the SP is made biannually by the GSL and SOs or others when appropriate.

### **Partners**

4.6 All new Partners will undergo a safeguarding audit conducted by the GSL or SO to identify key support needs.

4.7 Partners who do not have a robust Safeguarding Policy or procedures will be required to sign up to the Chance for Childhood Global Safeguarding Policy until they have such policies in place. Any deviation from Chance for Childhood's GSP while under its jurisdiction will be investigated as a matter of grave concern and may result in a cessation of their grant from and partnership with Chance for Childhood.

4.8 Partners will be required to ensure all staff receive Safeguarding training, including PSEA training, at least once a year.

4.8 Where necessary and depending on individual organisational requirements, Partners will be supported to build the capacity of their own organisation to develop good practice in all elements of safeguarding and develop their own Safeguarding Policies and Procedures that are culturally relevant and uphold legal requirements for their local context, whilst also meeting the requirements of Chance for Childhood's Global Safeguarding Policy.

## **5 COMMUNICATIONS ABOUT OUR WORK**

As part of our duty of care for the children, young people and adults at risk, Chance for Childhood will always put the people we support needs first. Chance for Childhood recognises its responsibility to the children, young people, their families and any other adults who are portrayed in any of the images or communications used and will always strive to represent them accurately and not as passive victims.

Chance for Childhood fully understands that everyone must be represented as human beings with their own identity and their dignity must be always preserved.

- Permission and signed consent forms will always be sought from the child/children themselves, their parent or guardian before taking photographs.
- No photos will be used until we have received a copy of the consent form from our Partner Organisation or a CfC staff member.
- The names of children, young people and adults at risk will always be changed to protect their identity.
- No images of children, young people or adults at risk will be used which are degrading, sexually provocative or where children are partially clothed or naked.
- No photos should be manipulated or taken out of context.
- Any identifiable details will not be photographed or shown.
- Third parties requesting the use of Chance for Childhood's images or other materials should sign the agreement on guidelines as defined here in this policy.
- Photographs, videos and consent forms will be kept for five years and then deleted or destroyed.
- All social media (blogs, Facebook etc.) generated by Chance for Childhood will be subject to the same safeguarding guidelines as outlined in this policy.
- Information, images and consent forms will be kept confidential in secure files (either protected folders or locked drawers). Access to images is limited to those that need them during the course of their work.

### **Online and social media**

Chance for Childhood uses online and social media channels including a website, Facebook, Twitter, YouTube, Instagram, LinkedIn, and online Newsletters to raise awareness about our work. These channels are managed and monitored by Chance for Childhood.

### **Personal use of social media**

All Chance for Childhood staff, trustees, volunteers, media professionals and invited guests are asked to follow the below guidelines in relation to their own social media use.

- If sharing posts on your own social media channels about Chance for Childhood activities, ensure you are communicating appropriately and in line with the Chance for Childhood Safeguarding Protection Policy.
- Do not make friends or connect with any of the children, young people or adults at risk you meet through Chance for Childhood or partner organisations on any form of social media.
- Do not take any photos of children, young people or adults at risk unless agreed in advance with the Chance for Childhood or the partner organisation.
- Do not create or transmit material that might be defamatory or incur liability for Chance for Childhood.
- Do not send or post messages or material that could damage Chance for Childhood's image or reputation.
- Do not discuss colleagues, competitors, donors or suppliers without their approval.

### **Communications Guidelines for Visitors**

Chance for Childhood policy states that individuals visiting Chance for Childhood or our Partners must follow the above guidelines.

If you wish to share photos or film regarding your experience with Chance for Childhood and our Partners, please share content already posted on the official online channels. This ensures that all images circulated online have obtained the necessary permissions and consent from children, young people and adults before being posted. Visitors and Volunteers are not permitted to take their own photos or film of anyone at Projects/in Programmes during their time with Chance for Childhood, unless expressly agreed in advance.

If you have any questions or clarifications on the reasons for these policies, please don't hesitate to speak to the GSL.

## 6 REPORTING CONCERNS

### Confidentiality

**It is essential that confidentiality is maintained at all stages of the reporting process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be confidential and shared only on a need to know basis. Written information should always be kept secure.**

In any cases of suspicion of abuse, the person to whom it has been reported to must immediately inform Chance for Childhood's in country SO or the UK GSL and not discuss it with any other person.

The reporting of suspected or actual abuse is a professional and legal obligation. Failure to report information can lead to disciplinary action or dismissal.

Any suspected or actual exploitation and/or abuse in the UK should be reported immediately to Chance for Childhood's GSL.

In cases of suspected or actual exploitation and/or abuse in the countries we work in, the person to whom it has been reported or who has concerns must immediately inform the SFP within the organisation. The SFP will then inform Chance for Childhood's relevant SO or GSL. If the SFP cannot be reached, report the case directly to the GSL.

The informant must fill out or be supported in filling out an incident reporting form as soon as possible and submit to either the SO or the SFP depending on the area in which the case was reported (Appendix 3: Form for reporting of suspected abuse).

The SOs are responsible for filing report forms in a secure place in the relevant Chance for Childhood Country Office's filing system and sharing a copy with the GSL.

All SFPs and SOs are to compile a list of local agencies that deal with issues relating to safeguarding and to whom children, young people and adults at risk can be referred (e.g. social services, emergency medical help, psychologist, paediatrician etc.), and update the list on an annual basis.

A standardised flowchart on reporting abuse is to be laminated and displayed at the Chance for Childhood office and all of the offices of our partnering organisations (Appendix 2: Safeguarding reporting flowchart), unless the organisation has already developed their own flowchart and reporting mechanisms for this process.

If the allegation is about SFP or SO, then contact the GSL. If the accusation is about the GSL, then contact the CEO (Appendix 2: Safeguarding reporting flowchart).

## 7 RAMIFICATIONS OF MISCONDUCT

Following an allegation of abuse/violation of the Safeguarding Policy in the UK, an initial clarification will be co-ordinated by the GSL. The GSL will immediately assess the severity of the accusation to decide on the relevant authority to inform. The GSL will respond upon the advice of the relevant authority and will record all information, investigate all facts, and assess the condition of the child, young person or adult at risk **within 48 hours**.

Following an allegation of abuse/violation of the Safeguarding Policy in countries we work in outside of the UK, an initial clarification will be coordinated by the relevant SO who will record all information, investigate the facts and assess the condition of the child **within 48 hours**, in association with the SFP of the partner organisation concerned. The SO will also report the incident to the GSL.

If an allegation of a violation of the policies, guidelines or practice of safeguarding is made concerning a named individual from a verifiable source, and the accused is a staff member in the UK, trustee, intern, volunteer, consultant or Chance for Childhood contractor, they will be **immediately** suspended on full pay (staff member) or suspended from all activity/association with Chance for Childhood (trustee, intern, volunteer, consultant or contractor) pending the outcome of an independent investigation. The decision to suspend must be taken by the CEO or a Chance for Childhood Trustee and is not open to challenge.

Chance for Childhood will take action against anyone, whether they are the subject of a complaint or not, who seek or carry out retaliatory action against complainants, survivors or other witnesses. Employees may be subject to disciplinary action, up to and including termination of employment.

The investigation process will be confidential, and information limited only to those who need to know (GLT, GSL, SO, SFP and relevant staff at Partner organisation). All parties involved will be required to keep all information relating to the case confidential and documentation will be filed securely.

Depending on the outcome of the independent investigation, if it comes to light that anyone associated with Chance for Childhood commits acts in relation to children, young people or adults at risk - whether within or outside the context of Chance for Childhood's work - which are criminal, grossly infringe children's rights, or contravene the principles and standards contained in this document, Chance for Childhood will take immediate disciplinary action and any other action which may be appropriate to the circumstances.

The media will be dealt with by the CEO or the Board of Trustees depending on the individual circumstances of the incident in question.

## 8 MONITORING

The monitoring of the Global Safeguarding Policy will be co-ordinated and supported by the Global Safeguarding Lead.

The Global Safeguarding Lead will also responsible for designing, implementing and monitoring all training in relation to Safeguarding and PSEA.

Safer recruitment will be monitored by the Global Management Team with support from the Global Safeguarding Lead

Safer Programme development and implementation will be overseen by the Programmes Team and the Global Safeguarding Lead.

The Global Safeguarding Lead with be responsible for the reviewing and development of Partner Organisations safeguarding Policies, Procedures and Approaches as well as co-ordinating a Community of Practice amongst Partners and Chance for Childhood staff.

Safeguarding incidents will be collated and analysed and fed into the monitoring of the Global Safeguarding Policy at Global Management and Board Level

## APPENDIX 1: CHANCE FOR CHILDHOOD CODE OF CONDUCT

Last updated: June 2020

Approved by Board:

Next update: June 2023

The Code of Conduct should be interpreted in a spirit of transparency and common sense, with the best interests of the child, young person or adult at risk as the primary consideration. This Code of Conduct is applicable to all staff, contractors, trustees, visitors and volunteers.

Chance for Childhood has a zero-tolerance approach to abuse and exploitation of any kind – physical, verbal, emotional or sexual.

We believe all people have a right to live their lives free from sexual violence and any abuse of power regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin. And everyone we come into contact with should be treated equally.

Whilst recognising that local laws and cultures differ considerably from one country to another, Chance for Childhood is an International Non-Governmental Organisation, and therefore the Code of Conduct is developed from international and UN standards. Chance for Childhood representatives are expected to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

As a part of the Chance for Childhood Team, you are in a position of trust and this must be taken seriously. You must **always** act professionally and communicate and behave appropriately. You must work with children, young people and adults at risk respectfully, fairly and equally and in a way that protects them. This Code of Conduct is designed to ensure a safe working environment for all those working for Chance for Childhood and promote the safety of anyone coming into contact with Chance for Childhood's work.

**Compliance with this Code of Conduct is mandatory under all circumstances and is to be upheld during and outside of working hours.**

**Breaching the Code of Conduct is grounds for disciplinary action up to termination of contracts and, where appropriate, referral to other agencies such as the police.**

During your induction, you will be taken through this Code of Conduct, please ensure that you ask any questions that you are uncertain of or require clarifications before you sign it. You will be expected to sign the Code of Conduct within one week of commencement in post.

### **Interactions with Others**

- I will treat everyone I encounter equally no matter their age, gender, sexuality, sexual orientation, disability, religion or ethnic origin
- I will treat all colleagues with dignity and respect
- I will be observant of all local laws and respectful towards local culture & customs
- I will not condone or participate in behaviour that is illegal or unsafe or that could bring the Chance for Childhood into disrepute

### **Abusive or exploitative conduct**

- I will not engage in any forms of abusive, degrading or exploitative behaviour.
- I will not sexually abuse or exploit anyone
- I will not physically assault anyone
- I will not emotionally or psychologically abuse anyone
- I will never engage in sexual activity with children under the age of 18, regardless of the age of consent, local customs or the law in effect.
- I will not pay for sexual services, of any kind, with anyone, of any age. I will not exchange money, employment, goods or services for sex, including sexual favours or indulge in any other forms of humiliating, degrading or exploitative behaviour. I will never watch, publish, produce, or share pornography showing children, and / or show such material to children.
- I will not engage in sexual relationships with adults participating in or linked with Chance for Childhood funded programmes
- I will not use physical punishment or chastisement, however acceptable or moderate it may seem  
I will not use any language intended to belittle or humiliate children, young people or adults at risk

### **Interactions with Children, Young People and Adults at Risk in CfC OR Partner Programmes**

- I will not discriminate against, show differential treatment, or favour particular children, young people or adults at risk, to the exclusion of others
- I will not share personal details, including social media, with any child, young person or adult at risk of Chance for Childhood's programmes or Partner Programmes or contact them in any way.
- I will be aware of the inherent power dynamic in adult-child relationships and avoid taking any advantage this may provide.
- I will avoid doing anything that could be misinterpreted by a third party. I will immediately note the circumstances of any situation which occurs which may be subject to misinterpretation by a third party.
- I understand that it is strictly prohibited to possess, use or be under the influence of alcohol or drugs whilst at work.
- I will only take photos and/or video where consent has been obtained and with the prior approval of project staff

### **Uphold confidentiality**

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so.

## Complaints and reports

Chance for Childhood staff are obligated to **immediately** bring to the attention of their line manager any potential incident, abuse or concern that they witness, are made aware of, or suspect which appears to breach the Standards contained in this Code.

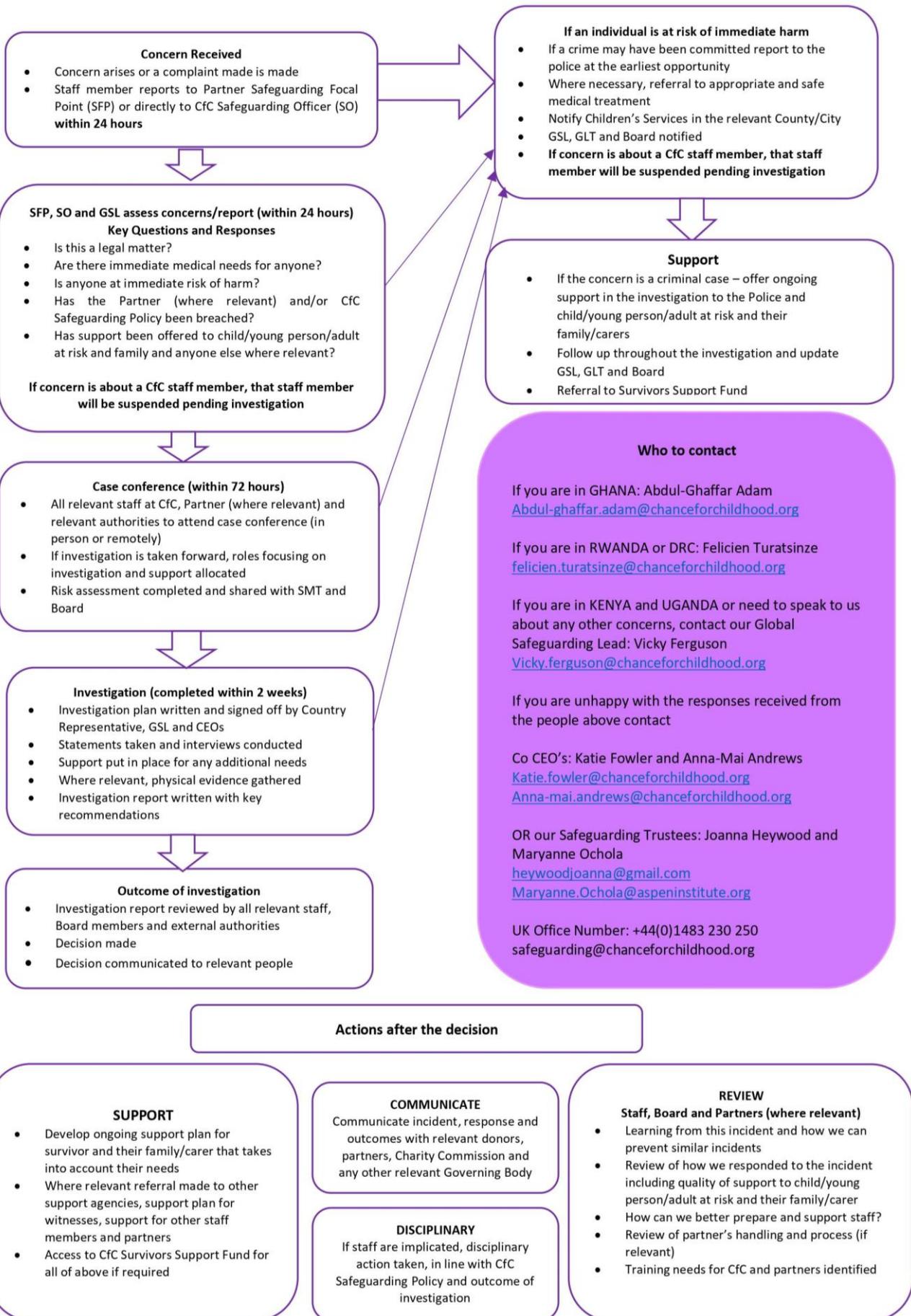
If the staff member does not feel comfortable reporting to their line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they should report immediately to the GSL.

Staff reporting concerns are protected by the Whistleblowing policy.

For further information of how to report a breach of the code of contact please see the Whistleblowing policy (Appendix 6)

## APPENDIX 2: SAFEGUARDING REPORTING FLOWCHART

CONFIDENTIALITY MAINTAINED



## APPENDIX 3: REPORTING A CONCERN

### Safeguarding Concern Form

#### What is this form for?

Use this to report a concern or disclosure of abuse against a child, young person or adult at risk. The concern can be from something you have seen or have been told, either directly by the individual or by another person.

#### Who should complete this form?

Anyone with a concern should complete this form. All Chance for Childhood employees, volunteers, trustees, visitors, consultants, contractors have an obligation under our Safeguarding Policy to report any concern or disclosure of a child, young person or adult at risk suffering physical, emotional, sexual exploitation sexual abuse or neglect. You do not need permission before completing this form, but you can speak to the Safeguarding Focal Point, Safeguarding Officer or Global Safeguarding Lead if you are unsure.

You will also need to complete a consent form to ensure the person is happy for their information to be shared. (See Appendix 4)

#### When should it be used?

As soon as possible but within 24 hours of the incident/conversation that has given you cause for concern. Reporting is not an investigation and you are not required to verify allegations or seek more information before using this form. This form will help others make decisions about what should be done. Just complete what information you can.

#### Who should this form be sent to?

Ghana: [abdul-ghaffar.adam@chanceforchildhood.org](mailto:abdul-ghaffar.adam@chanceforchildhood.org)

Rwanda and DRC: [felicien.turatsinze@chanceforchildhood.org](mailto:felicien.turatsinze@chanceforchildhood.org)

Any other location: [Vicky.ferguson@chanceforchildhood.org](mailto:Vicky.ferguson@chanceforchildhood.org)

**In case of a change of staff or a staff member being on annual leave please also include [safeguarding@chanceforchildhood.org](mailto:safeguarding@chanceforchildhood.org) in ALL correspondence**

## Safeguarding Reporting Form

Please put in sealed envelope marked confidential or write confidential in the message subject line if emailing the form.

Note: This form is designed to be a guide. Please include as much information as you can. Please add any additional information not included in these questions.

Your name:	
Your Position:	
Your Organisation:	
Phone number and email:	
Persons name:	
Persons Age:	
Persons location:	
Parents/carers names and contacts (if applicable):	
Nature of Concern/Abuse: Please write clearly what you have seen or been told that has given you cause for concern. If this information came from the person experiencing the abuse, please use their words where possible.	
Dates and places where incident/s took place e.g. date if your visit to a project or when child/person told you of the incident/s	

Which people were present and what were they doing?	
Are there any physical signs of abuse seen or reported to you?	
What did you observe about the persons behaviour, or changes in the person's behaviour, if you have met them more than once?	
Name of alleged/suspected perpetrator:	
Address/contact:	
Relationship to the person:	
Any other information about alleged/suspected perpetrator:	
Action taken so far:	
What did you say would happen next to person reporting this to you?	
Who else knows about this situation?	
Who else have you discussed it with?	
What actions have been taken already (e.g. medical treatment, contact with police)?	

--

Has consent been gained to speak to external agencies? (please attach copy of consent)

External agencies contacted (please include date & time)

<p>Police</p> <p>Yes/No</p>	<p>If yes - which:</p> <p>Name and contact number:</p> <p>Details of advice received/actions taken:</p>
<p>Department of Children's Services</p> <p>Yes/ No</p>	<p>If yes - which:</p> <p>Name and contact number:</p> <p>Details of advice received/actions taken:</p>
<p>Health Services</p> <p>Yes/No</p>	<p>If yes - which:</p> <p>Name and contact number:</p> <p>Details of advice received/actions taken:</p>
<p>Other</p>	<p>Which:</p> <p>Name and contact number:</p> <p>Details of advice received/actions taken:</p>

Signature:

Print name:

Date:

## APPENDIX 4: CHANCE FOR CHILDHOOD'S INFORMATION SHARING CONSENT FORM

### Chance for Childhood Information Sharing Consent Form

I, \_\_\_\_\_, hereby give my permission for Chance for Childhood to share personal information with other service providers in connection with my care. I agree to a referral being made to other supportive services, if required, to support my needs. I understand that Chance for Childhood may hold information gathered about me from the various agencies and as such my rights will not be affected.

#### Statement of Consent:

- I understand that personal information is held about me.
- I have had the opportunity to discuss the implications of sharing or not sharing information about me.
- **I agree that personal information about me may be shared and gathered from the following agencies:**

- Relevant Police Department
- Relevant Public and Private Health Institutions
- Mental Health Support Services
- Relevant legal services
- Department of Children's Services
- Education/Education support services
- Training support services
- Substance misuse support services
- Accommodation providers
- Other organisations that can offer relevant support (list below)

Are there any agencies you do not want us to share or gather additional information with?  
Please list them here:

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I agree to my information being shared and gathered between services

**Your consent to share personal information is entirely voluntary and you may withdraw your consent at any time.** Should you have any questions about this process, or wish to withdraw your consent, please talk to any member of the Chance for Childhood team.

**Name** .....

**Date of Birth** .....

**Signature** .....

**Date** .....

**Staff Member Name** .....

**Signature** .....

**Date**.....

**Department**.....

## APPENDIX 5: CHANCE FOR CHILDHOOD'S KEY SAFEGUARDING CONTACTS

For Kenya and Uganda and any other matters relating to Safeguarding, please contact our Global Safeguarding Lead, Vicky: [Vicky.ferguson@chanceforchildhood.org](mailto:Vicky.ferguson@chanceforchildhood.org)

For matters involving Ghana, please contact Country Representative and Safeguarding Officer, Abdul: [abdul-ghaffar.adam@chanceforchildhood.org](mailto:abdul-ghaffar.adam@chanceforchildhood.org)

For matters involving Rwanda and DRC please contact Programme Manager and Safeguarding Officer, Felicien [felicien.turatsinze@chanceforchildhood.org](mailto:felicien.turatsinze@chanceforchildhood.org)

**In case of a change of staff or a staff member being on annual leave or not having access to their email please also include [safeguarding@chanceforchildhood.org](mailto:safeguarding@chanceforchildhood.org) in ALL correspondence**

**If you are unhappy with the responses received from the people above, contact**

Co CEO's: Katie Fowler and Anna-Mai Andrews

[Katie.fowler@chanceforchildhood.org](mailto:Katie.fowler@chanceforchildhood.org)

[Anna-mai.andrews@chanceforchildhood.org](mailto:Anna-mai.andrews@chanceforchildhood.org)

OR our Safeguarding Trustees: Joanna Heywood and Maryanne Ochola

[heywoodjoanna@gmail.com](mailto:heywoodjoanna@gmail.com)

[Maryanne.Ochola@aspeninstitute.org](mailto:Maryanne.Ochola@aspeninstitute.org)

UK Office Number: +44(0)1483 230 250

**APPENDIX 6: STATEMENT OF COMMITMENT TO CHANCE FOR CHILDHOOD'S SAFEGUARDING POLICY**

- I have read and understood and agree to uphold Chance for Childhood's Global Safeguarding Policy
  
- I have read and understood and agree to uphold Chance for Childhood's Code of Conduct

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(Print name)

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(Job title / role)

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(Signature)

---

(Date)

## APPENDIX 6: WHISTLEBLOWING POLICY

Last updated: September 2020

Approved by Board of Trustees: September 2020

Next Review: September 2023

### Policy Statement

Chance for Childhood is committed to developing a safe and open culture of communication and accountability to mitigate the risk of things going wrong or of unknowingly harboring malpractice.

Chance for Childhood expects all staff to maintain high standards of conduct and integrity and takes misconduct and malpractice extremely seriously. We want everyone who works for us and with us to feel able and secure about raising concerns.

The aims of this policy are:

- To encourage you to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated as appropriate, and that your confidentiality will be respected.
- To provide you with guidance as to how to raise those concerns.
- To reassure you that you should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken (if those concerns are not malicious).

The policy applies to anyone who works for, or on behalf of, Chance for Childhood in the UK and across our Regional Offices, including all our employees, trustees, consultants, contractors, NGO partners, agency workers, casual workers, and volunteers. This includes whether you work for us as an employee or on a self-employed basis. All the above will undergo mandatory whistleblowing training as part of their safeguarding training within one month of commencement of the role to ensure everyone is comfortable and confident to raise concerns whilst feeling protected.

This policy may be amended at any time.

### What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity;
- Miscarriages of justice;
- Danger to health and safety;
- Damage to the environment;
- Failure to comply with any legal or professional obligation or regulatory requirements;
- Financial fraud or mismanagement;
- Negligence;
- Breach of our internal policies and procedures including our Global Safeguarding Policy and Code of Conduct;
- Conduct likely to damage Chance for Childhood's reputation;
- Unauthorised disclosure of confidential information; or

- The deliberate concealment of any of the above matters.

If you have any genuine concerns relating to any of the above, you should report it under this policy. This policy should not be used for complaints relating to your own personal circumstances. In those cases, you should use the **Grievance Procedure** which can be found in the Staff Handbook.

## Principles

We are committed to the principles set out in this policy. If you use this policy to raise a concern, we give you our assurance that you will not be treated unfairly or lose your job. We will treat your concern seriously and act according to this policy.

Chance for Childhood will not tolerate the harassment or victimisation of anyone raising a genuine concern and will take all reasonable steps to prevent such detrimental behaviour. It is a disciplinary offence to deter anyone from using the whistleblowing policy and/or bullying, isolating or otherwise victimising anyone who raises a concern in the public interest using the whistleblowing process.

Confidentiality will always be respected. We hope that you will feel able to voice whistleblowing concerns openly under this policy. We do not encourage you to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. Chance for Childhood will always act within the remit of the law and, unless the law requires otherwise, will only make disclosures to third parties or other staff with your consent.

## Roles, Responsibilities and Reporting

**Anyone who works for, or on behalf of, Chance for Childhood** are responsible for reporting concerns under the circumstances set out in this document.

**Line Managers** are responsible for:

- ensuring all staff are aware of this policy and procedure and their responsibilities;
- fostering an open culture within their teams.

**Global Safeguarding Lead (GSL) and Safeguarding Officers (SO)** who will act as Whistleblowing Officers are responsible for:

- Ensuring that all Whistleblowing Reports are logged;
- Ensuring the individual raising a concern is supported;
- Organising the investigation of issues raised promptly and thoroughly;
- Escalating issues/engaging the support of the Global Safeguarding Lead, CEO or nominated Trustee as required.

**The Senior Management Team** have overall responsibility for the effective implementation of whistleblowing arrangements, including:

- Ensuring learning from whistleblowing cases is fed back to the wider organisation;
- Ensuring all staff are trained in dealing with issues;
- Ensuring the process is regularly monitored and improved where required;
- Presenting an annual report of all logged whistleblowing complaints, including details of:
  - The number and types of concerns raised;
  - An anonymous summary of the outcomes of investigations;
  - Feedback from individuals who have used the arrangements;
  - Any complaints of victimisation;

- Any complaints of failures to maintain confidentiality;
- A review of other existing reporting mechanisms (such as fraud, incident reporting or health and safety reports);
- A review of other adverse incidents that could have been identified by staff (e.g. partner or service user complaints, publicity or wrongdoing identified by third parties);
- A review of any relevant litigation; and
- A review of staff awareness, trust and confidence in the arrangements.

**The Co-CEOs will:**

- Appoint the Global Safeguarding Lead and Safeguarding Officers (who act as Whistleblowing Officers) within that role.
- Work with the GLT, Line Managers and GSL and SOs to foster a culture of openness and accountability
- Submit the annual Whistleblowing report to the Board of Trustees

**The Board of Trustees will:**

- Appoint a trustee(s) with lead responsibility for Whistleblowing [this will be the same Trustee as nominated as the Safeguarding Lead] which will be reviewed and rotated accordingly
- Review the annual whistleblowing report;
- Review and approve revisions to the Whistle blowing Policy and Procedures;
- Provide advice and support to GSL and SOs in the event of a complaint and investigation.

# Whistleblowing Procedure

## Raising a Whistleblowing Concern

We hope that in many cases you will be able to raise any concerns with your line manager or the CEO. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

However, where you feel that your concern has not been addressed, or you prefer not to raise it with the above person for any reason, you should contact the Whistleblowing Officers. The Officer will then launch the formal Whistleblowing Procedure with the GLT and/or the Chance for Childhood Board. (This procedure is explained below and in the Whistleblowing Process flowchart):

Vicky Ferguson (UK) [vicky.ferguson@chanceforchildhood.org](mailto:vicky.ferguson@chanceforchildhood.org)

Felicien Turatsinze (Rwanda) [felicien.turatsinze@chanceforchildhood.org](mailto:felicien.turatsinze@chanceforchildhood.org)

Abdul Ghaffar Adam (Ghana) [abdul-ghaffar.adam@chanceforchildhood.org](mailto:abdul-ghaffar.adam@chanceforchildhood.org)

Board of Trustees Safeguarding Leads: Joanna Heywood, [heywoodjoanna@gmail.com](mailto:heywoodjoanna@gmail.com); Maryanne Ochola, [Maryanne.Ochola@aspeninstitute.org](mailto:Maryanne.Ochola@aspeninstitute.org);

Police if appropriate (see also external disclosures).

All our Whistleblowing Officers will have received additional training in how to support you during the process of reporting concerns and during an investigation.

## How to Raise a Concern

It is preferable if you raise a concern in writing, but you can raise a concern by telephone, in person or in writing.

Although you are not expected to prove the truth of your concern beyond doubt or provide evidence, so that the concern can be considered, you will generally need to provide, as a minimum, details of the nature of the concern and why you believe it to be true, and the background and history of the concern (giving relevant dates where possible). In general, discussion around the formal/informal disclosure can be strengthened with further details of the nature and background of the concern.

## How we will respond to a concern

### 1. Concern raised

We are committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. We will acknowledge your concern within **72 hours**.

### 2. Responding to concern

We will arrange a meeting **within one week** to discuss the concern raised. You may bring a work colleague or trade union representative to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage

### 3. Investigation

After the meeting, we will decide how to respond. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage, which may be formal or informal, depending on the nature of the concern raised.

A member of the GLT or Trustee will conduct the investigation, or where appropriate and necessary external investigators may be brought in. Whistleblowing investigations relating to safeguarding incidents will only be carried out by GLT in consultation with Global Safeguarding Lead and where necessary, external investigators.

The length of an investigation will vary depending on the nature of the issue. We will aim to resolve all investigations **within 30 days**.

#### **4. Investigation complete and actions**

The Whistleblowing Officer, CEO and/or Trustee will keep you informed of the progress of the investigation carried out and when it is completed and give you an indication of timings for any actions or next steps that we will take, but we cannot inform you of any matters which would infringe any duty of confidentiality owed to others.

We will keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way.

If you are not happy with the way in which your concern has been handled, we will inform you of who you can raise it with but this is likely to be a Board Member or an external body. You will find a relevant list at the end of this document.

### **Confidentiality**

If you do not want your identity to be revealed, please let us know when raising your concern. All concerns raised will be treated in confidence and appropriate arrangements will be made not to reveal your identity, as far as is practicable.

We hope that all staff will feel able to voice their concerns openly under this policy and procedure. Although a concern may be raised anonymously, we encourage you to give your name when reporting your concern whenever possible. If this is not done, it will be much more difficult for us to protect your position or to give feedback on the outcome of investigations. Concerns that are expressed completely anonymously are also sometimes more difficult to investigate but will be dealt with in line with policy and procedure.

If disciplinary or other proceedings are implemented following the conclusion of the whistleblowing investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

### **Protection and support for Whistleblowers**

Whistle blowers in the UK are protected under law by the Public Interest Disclosure Act 1998. This gives protection to people who raise an issue provided that they have

reasonable grounds for raising a concern, the concern is raised in good faith and/or they believe that the disclosure is in the public interest.

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support you if you raise genuine concerns under this policy, even if they turn out to be mistaken.

You will not suffer any detrimental treatment as a result of raising a concern. If you believe that you have suffered any detrimental treatment, you should inform the Whistleblowing Officer immediately.

You must not threaten or retaliate against whistleblowers in any way. Any employee involved in such conduct may be subject to disciplinary action which could result in dismissal for gross misconduct.

Supportive measures will be put in place for the whistleblower taking into account their needs. We will appoint a support service to link with the whistleblower to ensure they feel supported through the process of investigation. The support service might be a colleague or line manager or external representative further to agreement of the whistleblower. Chance for Childhood has resources to draw down on to offer external counselling and support through our Survivors Support Fund.

## External disclosures

In some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external and you are reminded of your confidentiality obligations.

More information about potentially relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available at the websites/contacts below.

Relevant regulators and inspectorates to raise concerns with or seek more advice from	Contact Details:
The Charity Commission	<a href="https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer">https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer</a> Telephone: 0300 066 9197 Email: <a href="mailto:whistleblowing@charitycommission.gsi.gov.uk">whistleblowing@charitycommission.gsi.gov.uk</a>
Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>
Protect (Independent Whistleblowing advice line)	<a href="https://protect-advice.org.uk/advice-line/">https://protect-advice.org.uk/advice-line/</a>
NGO Bureau Uganda, Ministry of Internal Affairs	+256393241233 <a href="mailto:info@mia.go.ug">info@mia.go.ug</a>
Rwanda Governance Board	<a href="mailto:info@rgb.rw">info@rgb.rw</a> <a href="tel:(250)255112023">(250)255 112 023</a>

Ghana Department of Social Welfare (under the Ministry of Gender, Children and Social Protection)	0302684536
Kenya NGO Co-Ordination Board	Tel: 254-20-2214044, 2214887 Email: info@ngobureau.go.ke

**Whistleblowing Procedure Flowchart**

