

SAFEGUARDING POLICY

1. Purpose and scope

As an international development organisation whose work is underpinned by both UK law and international obligations including the United Nations Convention on the Rights of the Child (UNCRC), IHP recognises a responsibility for ensuring the basic rights and dignity of those who come into contact with our work. IHP is fully committed to protecting people, particularly children and vulnerable people, from harm, abuse, neglect, and exploitation in any form and has a zero-tolerance approach to breaches of this policy.

The purpose of this policy is to protect people, particularly children and vulnerable people, from any harm that may be caused due to their coming into contact with IHP. This includes harm arising from the conduct of IHP representatives (as defined in Section 2) or organisations who partner with IHP.

This policy lays out the commitments made by IHP in relation to safeguarding and informs IHP representatives of their responsibilities in relation to safeguarding.

This policy applies to:

- all representatives of IHP (as defined in Section 2 of this policy) in any context and regardless of geographical location. Representatives must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. Actions taken by representatives outside of work for IHP that contradict the core principles of this policy, may also be considered a violation of the policy; and
- organisations who partner with IHP, who must take all reasonable steps to ensure the children and vulnerable people who come into contact with IHP, and its programmes are safe and protected. IHP's partner organisations are expected to have a Safeguarding Policy or be working towards one; this is reviewed in the context of new partner applications and, with respect to existing partners, checked annually in our Annual Partner Update process.

This policy does not cover:

- the handling of safeguarding complaints made to IHP's partner organisations, which should be undertaken in accordance with the relevant organisation's Safeguarding Policy.

Any breach of this policy will be treated as a disciplinary matter, potentially resulting in immediate termination of contract, voluntary involvement or representation. Additionally, it may involve reporting to the police and other relevant regulatory authorities in the UK and host nation.

2. Definitions

- *Safeguarding* – In the UK, safeguarding means protecting people’s health, wellbeing and human rights, and enabling them to leave free from harm, abuse and neglect¹. In the international development sector, we understand it to mean protecting people, including children and vulnerable people, from harm that arises from coming into contact with IHP employees or programmes.
- *Representative* – The term ‘representative’ is used in this document to refer to both IHP and IHP Inc. and their respective officers, directors, employees, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third-party representatives, regardless of where they are domiciled..
- *Child* – In line with the UNCRC and UK law, a child is defined as any person under the age of 18 years.
- *Vulnerable people* – A vulnerable adult is defined as any person of 18 years and above, who by reason of disability, age, gender, context, economic status, illness or social standing may be unable to personally protect himself/herself against abuse, harm or exploitation. A vulnerable person is used as the umbrella term for all ages and contexts in this policy.
- *Abuse* – in line with the definition of the World Health Organisation (WHO) – IHP understand abuse to be all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation; resulting in actual or potential harm to the health, survival, development or dignity of a child or vulnerable person.

3. Guiding Principles

IHP safeguarding is guided by the following principles.

- i) Everybody has an equal right to protection from harm, irrespective of gender, age, ethnicity, sexual orientation, marital status, disability, language, religion, political views, social origin or standing.
- ii) IHP will take appropriate immediate action in regard to its duty of care for children and vulnerable people.
- iii) IHP will ensure that all its representatives are inducted in safeguarding standards and procedures.
- iv) IHP will ensure that its partners are willing to comply with safeguarding standards and procedures.
- v) IHP is fully committed to monitoring, updating and implementing this safeguarding policy. This policy will be reviewed every 12 months and earlier where necessary. IHP will ensure that this policy is updated to reflect any changes in UK law and/or international standards.
- vi) IHP recognises its responsibility to maintain confidentiality and protect sensitive data. As such, information will only be shared if there is a legal basis and a legitimate reason for doing so.

¹ NHS England, Safeguarding, <https://www.england.nhs.uk/safeguarding/about/>

vii) IHP recognises that there are cultural sensitivities in different contexts. IHP always seeks to operate in culturally sensitive ways which respect the diverse nature of the people with whom it works. IHP therefore recognises that there are different understandings of safeguarding and protection. IHP understands that safeguarding in such a context is, at times, a balancing act. However, in all situations, nations and contexts, IHP will follow the general principle that all children and vulnerable people, without discrimination, have equal rights to protection from abuse and exploitation. IHP will not accept culture as an excuse for abuse.

viii) IHP commits to addressing safeguarding through its work, as well as through its procedures in relation to awareness, prevention, reporting and response outlined in this policy.

4. Procedures

4.1 Awareness

We undertake to ensure that all IHP representatives are made aware of the problems caused by abuse and the risk of harm to children and vulnerable people and have understood IHP's Safeguarding Policy and Code of Conduct.

We undertake to ensure that all IHP representatives understand their role and responsibilities in regard to safeguarding children and vulnerable people by: ensuring all new employees and trustees read this policy as part of their induction, and by ensuring all IHP employees and trustees attend safeguarding training at a level commensurate with the safeguarding responsibilities that are part of their role.

We undertake to ensure that there are safeguarding leads appointed in the IHP staff team and board to champion awareness of and compliance with this policy.

4.2 Prevention

4.2.1 Safeguarding Code of Conduct

All IHP representatives must sign the IHP Safeguarding Code of Conduct.

4.2.2 Our Work

Programme Design and Implementation: IHP will design and undertake its programmes and activities in a way that protects children and vulnerable people from any risk of harm that may arise from their coming into contact with IHP. This includes the way in which information about individuals in our programmes is gathered and communicated. Further details of how IHP works with programme partners is detailed in Section 4.2.3 of this policy. Safeguarding risk is assessed, mitigated and monitored included as a standing entry in IHP's risk register, which is reviewed quarterly by the Governance and Risk Management Committee. IHP's governance and oversight of safeguarding issues is detailed in section 7 of this policy.

Safe Recruitment and Selection Process: IHP implements stringent safeguarding procedures when recruiting, managing and deploying employees. Safe recruitment and vetting processes are followed for all employees. A basic DBS check is carried out on all new employees as well as trustees. If an employee is expected to be regularly engaging with children and/or vulnerable people, an enhanced DBS check will be undertaken as part of the recruitment process. All IHP employees are required to read and abide by this policy and the Safeguarding Code of Conduct.

Safeguarding training will be provided to all new employees and trustees at the earliest possible convenience. This training will include how to respond to a disclosure, how to raise concerns about (potential) safeguarding breaches, and how to raise concerns about a colleague or partner. The training will also cover how to recognise the signs of abuse and where to obtain advice or support.

If an employee requires any additional support to understand or implement this policy, it shall be provided by the lead Designated Safeguarding Officer, or an appropriate person authorised by them.

Overseas Trips

All participants to visit IHP programmes will sign the Safeguarding Code of Conduct before travel. Informed consent will be sought for collection of stories and photos during the trip.

4.2.3 Our partners

Organisations who partner with IHP must take all reasonable steps to ensure the children and vulnerable people who come into contact with IHP are safe and protected. As part of our due diligence in establishing a relationship with a prospective partner and our Annual Partner Updates for existing partners, we ask to see the relevant organisation's safeguarding policy. We also annually request information about any safeguarding concerns that have been raised in relation to programmes receiving IHP product, including details of how these concerns were dealt with. This information is recorded as part of our due diligence processes, and further details sought, or actions followed up with the partner as necessary.

IHP will strive to help our partners to create or develop their safeguarding policies and practices where there is capacity to do so. IHP will share its tools and policies with partners. IHP and partners will share mutual learning and develop their policies accordingly.

4.2.4 Media, Images and Identification

IHP is finalising guidance regarding the media and the use of actual names, images, including photographs and recordings. This will include specific points with regard to children and vulnerable people. The guidance will be shared with all partners and others who are involved in collecting communications content for IHP. This guidance should be applied in all contexts and will be available from the Communications and Engagement Manager and the Chief Operating Officer (COO).

Representatives will be made aware of this guidance in relation to the safeguarding of individuals and the appropriate use of images and beneficiary stories. Specifically, all representatives must understand that they must not use this technology to access or distribute any information or images that may be harmful to children or vulnerable people.

4.3 Reporting a concern

4.3.1 What to do if a child or vulnerable adult discloses something to you

- Listen to what the person has to say and let them speak freely.
- Do not try to confront the alleged perpetrator.
- Do not promise confidentiality. Instead, say that you will only speak to the necessary people.
- Inform the person of your next steps.
- Record immediately, or as soon after as possible, what the person has disclosed to you.
- If the matter is urgent – please go straight to the relevant authorities.
- Contact your line manager or the lead Designated Safeguarding Officer.

4.3.2 How to report a safeguarding concern

IHP representatives must immediately report any allegations or concerns regarding actual or potential abuse of or harm to children or vulnerable people that may arise from their contact with IHP. It is not the responsibility of the representatives to decide whether or not abuse has occurred; this responsibility resides with the lead Designated Safeguarding Officer (contact details are in Section 5 of this policy).

Concerns should usually first be raised with the lead Designated Safeguarding Officer to initiate procedures for dealing with the concern or allegation. If an individual raising a safeguarding concern believes there are outstanding/unresolved issues or that there has been unreasonable delay in handling or addressing the concern or wishes to raise a concern about the Designated Safeguarding Officer or other senior members of staff, the employee may raise the concern directly with the Safeguarding Lead on the IHP Board (contact details are in Section 5 of this policy). An employee raising concerns or complaints through formal whistleblowing channels will be protected by IHP's Public Interest Disclosure ('Whistleblowing') Policy.

IHP will also accept reports of concerns from external sources such as members of the public and official bodies. If the concerns do not relate to an IHP representative, the concerns may be referred outside IHP, where appropriate, e.g., to IHP's partners or law enforcement authorities (see Section 4.4.2 (Referrals) of this policy). The contact details for the lead Designated Safeguarding Officer are in Section 5 of this policy.

If you are raising a concern, make contemporaneous notes with any case numbers to maintain a thorough reporting process. A written report should be produced and filed

confidentially. The Reporting Safeguarding Incidents Form may be used for that purpose (Appendix 2).

If you wish to make a complaint about how a safeguarding concern has been dealt with, please refer to IHP's Complaint Policy.

4.4 Response by IHP

4.4.1 Investigation

IHP will investigate safeguarding concerns in accordance with this Safeguarding Policy and legal obligations.

Once a concern is reported, the lead Designated Safeguarding Officer will define how an appropriate investigation will be conducted and the timescale for the investigation, or if the matter should be referred (see Section 4.4.2).

The investigation officer must be a person with sufficient independence in relation to any IHP representative who is the subject of, or implicated in, the concern. Where an IHP representative is the subject of an investigation, the lead Designated Safeguarding Officer will lead the investigation, unless for some reason this is considered inappropriate.

IHP will collect any evidence in accordance with the law. All sensitive and personal data (including information of the person who reports the potential abuse) will be shared on a strictly need-to-know basis.

The Designated Safeguarding Officer will inform the CEO and trustees of any safeguarding concerns that have been reported as soon as is practical. Using guidance on the Charity Commission website (<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>), trustees will identify when any safeguarding concerns are serious incidents that must be reported to the Charity Commission.

If the concern is about an IHP representative, careful consideration must take place about the appropriateness of the person continuing to work with IHP during the investigation. Where needed, professional external advice should be sought.

IHP will apply appropriate disciplinary measures to IHP staff found in breach of this policy, up to and including termination of employment.

IHP will take action against anyone, whether they are the subject of a complaint or not, who seeks or carries out retaliatory action (such as but not limited to harassment, intimidation, unfair disciplinary action or victimisation) against complainants, survivors or other witnesses. Representatives who are found to do this will be subject to disciplinary action, up to and including termination of employment. If an IHP representative is found to have made an allegation that they knew to be false, they will be subject to disciplinary action, up to and including termination of employment.

4.4.2 Referrals

The lead Designated Safeguarding Officer will ensure that, where appropriate, referrals are made to the relevant law enforcement agencies, professional authorities, and/or partner organisations. Any case numbers should be recorded and kept with the report. The lead Designated Safeguarding Officer will also report on IHP's handling of safeguarding concerns to the Charity Commission and relevant donors.

4.4.3 Support for individuals

IHP is committed to offering pastoral care and support to survivors of harm or abuse perpetrated by an IHP representative, regardless of whether a formal internal process is carried out. Decisions regarding support will be led by the survivor. IHP will be accountable to survivors about the outcome of any investigation or referral and will seek feedback from survivors.

IHP will also offer supervision, support, and guidance to any IHP representative who has reported a concern.

5. Designated Safeguarding Officers

The lead Designated Safeguarding Officer is the CEO, Adele Paterson.

The lead Designated Safeguarding Officer is responsible for:

- i) Ensuring that the policy is implemented throughout IHP and all its representatives and that representatives undertake timely and appropriate training.
- ii) Ensuring that this policy is reviewed at least every 12 months to ensure it represents best practice and communicated to all IHP representatives. The lead Designated Safeguarding Officer will also keep aware of any changes to the International Child Protection Policy and its developments in specific countries.
- iii) Investigating, monitoring and recording reported safeguarding concerns promptly and rigorously.
- iv) Ensuring the appropriate referrals (see Section 4.4.2), e.g., to law enforcement agencies, professional authorities or partner organisations, occur without delay. This may include maintaining up-to-date knowledge of the methods for contacting Social Services, the Child Exploitation and Online Protection Command (CEOP).
- v) Appropriately delegating other designated safeguarding officers and duties.

The Safeguarding Lead on the board of Trustees is Wei-Lynn Lum, who can be contacted at w.lum@ihpuk.org or on 0774 170 1263.

6. Confidentiality and Data Protection

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

In regard to the General Data Protection Regulation, IHP recognises that particular protection is accorded to children. It is the responsibility of the Data Protection Officer to ensure that any personal information is kept confidential unless there is clear agreement of the individual and/or their parent/guardian. This can only be bypassed where dealing with a specialised welfare practitioner or law enforcement agency in relation to a specific safeguarding incident.

7. Governance and Oversight

The lead Designated Safeguarding Officer and the Safeguarding Lead on the board of trustees are members of the Governance and Risk Management Committee (GRMC). The GRMC provides oversight of the Safeguarding Policy on behalf of the board of trustees. The lead Designated Safeguarding Officer and the Safeguarding Lead on the board of trustees' report on safeguarding issues at each quarterly GRMC meeting (and more frequently if appropriate), including any safeguarding concerns, progress against the safeguarding action plan, and safeguarding issues of strategic importance. Safeguarding risks are continually monitored as a standing item on the IHP Risk Register; the register is also reviewed at least quarterly by the GRMC.

The board of trustees also plays an important role to help ensure that IHP complies with best practice in safeguarding and takes all reasonable steps to ensure there is appropriate transparency and accountability. The lead Designated Safeguarding Officer provides updates on safeguarding within the CEO report for each quarterly meeting of the board of trustees. Additionally, as matters arise, the board of trustees receives ad hoc confidential reports on incidents and also approves separate reporting where applicable to relevant regulatory authorities.