



Safeguarding Children & Vulnerable Adults Policy

FULL VERSION

Protecting Children & Vulnerable Adults

Preventing abuse

Promoting ethical behaviour

Adopted by the trustees on 20th January 2007

Reviewed April 2020

Our Vision and Mission

Our Vision

Cecily's Fund's vision is of a Zambia in which every child is educated and grows up to lead a self-reliant, healthy, fulfilling life and play an integral part in Zambia's development.

Our Mission

Cecily's Fund is a non-governmental organisation committed to improving the prospects for every Zambian orphan and vulnerable child to grow up to lead a self-reliant, healthy and fulfilling life. We do this by working with trusted Zambian partner organisations to ensure that these children have access to education and gain knowledge, life skills and HIV information.

Our Objectives

To work in collaboration with our Zambian partners:

- To design and implement programmes to ensure that children in Zambia, who have been orphaned or made vulnerable by the AIDS pandemic, are able to attend primary and secondary school on a basis of full equality with their peers and attain their full academic potential.
- To assist such orphans and vulnerable children (OVCs), who complete their school education, to contribute to Zambia's economic and social development by:
 - enabling them to train as peer health educators (PHEs);
 - developing links with the public and private sectors, and working with other organisations, to increase opportunities for orphan school-leavers to access employment and vocational training.
 - Strengthening communities to lessen dependency and become more self-reliant
- To increase the level of awareness and knowledge of HIV and AIDS in schools by mobilizing trained PHEs to undertake regular workshops and other peer health education activities. This will enable children and young adults to protect themselves and make informed choices, thereby contributing to the fight against the spread of the disease.
- To work collaboratively with other organisations where appropriate, and network locally and nationally, to ensure our programmes complement other significant initiatives (both governmental and non-governmental), disseminate good practice, share learning and maintain relevance and quality.
- To lobby key stakeholders to ensure that all those who have responsibilities towards OVCs (particularly those involved in promoting and safeguarding education entitlements) fulfil their obligations.
- To continue to build the capacity of our Zambian partners to manage programmes effectively, raise funds and develop robust, open and transparent accountability mechanisms.

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SAFEGUARDING POLICY STATEMENT

CF has a zero-tolerance approach to any form of child cruelty and exploitation defined by physical abuse, sexual abuse, coercion, emotional abuse, bullying, or neglect relating to a child, young person, or vulnerable adult under the care of UK staff, Zambian partners or beneficiaries supported by Cecily's Fund programmes.

All Cecily's Fund staff and Zambian partners are made aware of this Safeguarding policy and the system for reporting any concerns which will be investigated following the protocols detailed within this document.

In line with our values our guiding principle for safeguarding is:

Everybody at Cecily's Fund has a responsibility to keep children and adults who need care and support safe from abuse and neglect in all its forms.

We have prevention measures in place to prevent abuse in the communities in which we operate in Zambia. This includes safe recruitment practices and training in safe-guarding for front-line staff and volunteers across all CF programmes.

We work in close partnership with our Zambian partners to ensure safeguarding is integrated in all programme development and that UK and Zambian staff understand and are enabled to identify and respond appropriately to concerns about abuse.

We work in partnership with 'Keeping Children Safe' who sets standards for safeguarding children internationally. This policy document has been reviewed by 'Keeping Children Safe' to ensure that we are meeting the highest standards required.

1 Definitions

Child

For the purposes of this policy, a “child” is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child (UNCRC).

Adult

An adult at risk is a person aged 18 or over who is in need of care and support 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 or exploitation.

Child abuse

- According to the **World Health Organisation**, “Child abuse” or “maltreatment” constitutes ‘all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power’.
- The **NSPCC** similarly specifies “cruelty to children” or “child abuse” as ‘behaviour that causes significant harm to a child. It also includes when someone knowingly fails to prevent serious harm to a child. All forms of cruelty are damaging – it can be harder to recover from the emotional impact than from the physical effects’. We apply these definitions to both children and adults who need protection.
- These definitions therefore point to **four types of cruelty**:
 - **Physical abuse**: including hurting or injuring a child, inflicting pain, poisoning, drowning, or smothering.
 - **Sexual abuse**: including direct or indirect sexual exploitation or corruption of children by involving them (or threatening to involve them) in inappropriate sexual activities.
 - **Emotional abuse**: repeatedly rejecting children, humiliating them or denying them worth and rights as human beings.
 - **Neglect**: the persistent lack of appropriate care of children, including love, stimulation, safety, nourishment, warmth, education, and medical attention.
- A child who is being abused may experience more than one type of cruelty.
- Discrimination, harassment, and bullying are also abusive and can harm a child, both physically and emotionally.

Safeguarding

Safeguarding is a broad term to describe philosophies, policies, standards, guidelines and procedures to protect children from both intentional and unintentional harm. In the current context, it applies particularly to the duty of organisations - and individuals associated with those organisations - towards children and vulnerable adults. ‘Safeguarding’ is a term used by many organisations for the work and programmes they undertake in the community or broader social environment. This policy is about *organisational* safeguarding – i.e. implementing a ‘child-safe organisation’.

Direct contact with children

Being in the physical presence of a child or children in the context of Cecily’s Fund’s work, whether contact is occasional or regular, short or long-term:

1. In the UK this could involve delivering talks to schools, churches and youth groups
2. Overseas this could involve project / site visits and attending conferences at which children are also present.

[N.B. this list of examples is not exhaustive].

Indirect contact with children

1. Having access to information on children in the context of Cecily’s Fund’s work, such as children’s names, locations (addresses of individuals or projects), photographs and case studies.
2. Providing funding for organisations that work ‘directly’ with children. Albeit indirectly, this nonetheless has an impact on children, and therefore confers upon the donor organisation responsibility for child protection issues.

[N.B. this list of examples is not exhaustive].

Partner

For the purposes of this policy:

1. An overseas organisation that receives funding from Cecily’s Fund, whether funding is occasional or regular, short or long term, for a specific project or towards core costs and regardless of the amount of money involved.
2. An overseas organisation involved in project work with a UK-based organisation, whether the project relationship is short or long term, a one-off or regular / on-going arrangement, and regardless of whether or not any funding is involved.

Policy

A statement of intent that demonstrates a commitment to safeguard children and vulnerable adults from harm, and makes clear to all what is required in relation to the protection of both children and vulnerable adults. It helps to create a safe and positive environment for children and to show that Cecily’s Fund is taking its duty and responsibility of care seriously.

Named person responsible for child protection:	Cheryl Hooper, Director
Second named person responsible for child protection:	Steven Barlow Programme Manager

2 Statement of intent in relation to the implementation of safeguarding issues for overseas organisations under indirect Cecily's Fund responsibility:

Cecily's Fund safeguarding principles as outlined in this policy are based on the human rights standards of the UN Convention on the Rights of the Child that are *universally and cross-culturally applicable*. However, whilst maintaining a strong commitment to these principles (i.e. duty of care and protection in the best interests of the child), and in the belief that such fundamental principles are not culturally negotiable, Cecily's Fund nonetheless recognises:

- The difficulties faced by some Southern agencies in developing child protection and safeguarding policies overseas, in situations of scarcity of resources and lack of knowledge, supportive systems and legislative frameworks;
- The need for participatory, locally determined safeguarding policies and an agreement about the role that Northern actors, including Cecily's Fund, should play in this process;
- That safeguarding policies must be in place with local implementing partners and that CF plays an important role in ensuring that these are regularly reviewed and understood by all local staff working on CF projects.
- That Cecily's Fund, in collaboration with its fellow donor agencies, has an important capacity building role to play in this process.

In the light of this understanding, *at this stage*, Cecily's Fund's current Safeguarding Children and Vulnerable Adults Policy, as outlined in this document, is binding only for individuals directly associated with Cecily's Fund (employees, trustees, volunteers). However, Cecily's Fund commits to working together with its overseas partners to promote and support progressive implementation of safeguarding children and adults with its partner organisations as a matter of priority. Cecily's Fund pledges to work towards such implementation.

3 Core child protection principles and values

- **The legal basis – the UNCRC: Cecily's Fund Child Protection Policy is firmly based on the principles of the UN Convention on the Rights of the Child (CRC).** Taken holistically, the CRC provides a comprehensive framework for the protection, provision and participation of all children without discrimination to ensure their survival and development to the maximum extent possible. On the understanding that the CRC must be read as a whole, the following articles nevertheless form the specific basis of child protection: 1 (definition of 'child'), 2 (non-discrimination), 3.1 (the best interests of the child), 3.2 (duty of care and protection), 3.3 (standards of care), 6 (survival and development), 12 (participation), 13 (freedom of expression), 19 (protection from violence), 25 (periodic review of placements), 32, 33, 34, 36, 37(a) (protection from economic exploitation, substance abuse, sexual abuse and exploitation, 'all other forms of exploitation'; torture, cruel, inhuman or degrading treatment or punishment), 39 (physical and psychological recovery and social reintegration).

- **The moral basis – a non-negotiable duty:** Cecily’s Fund believes that NGOs working for children’s rights have an absolute duty to protect them from abuse, mistreatment, and exploitation from within organisations intended for their benefit. *This duty is imperative and non-negotiable. Without adequate standards and mechanisms of protection in place, an organisation is not only failing in its primary duty of care, but may also be negligently or recklessly fostering an environment of abuse.* Any organisation that claims to be working for the benefit of children *must* make sure that it is not putting children at risk through lack of attention to child protection policies and procedures.

- **An end to silence:** Silence breeds abuse and exploitation of children. Child sex abusers will seek out organisations with weak communication structures and thrive where secrecy and shame prevail. Furthermore, without proper policies and explicit procedures in place, NGOs are extremely vulnerable to false allegations of child abuse. Cecily’s Fund therefore believes in:
 - Creating an environment where issues of child protection are discussed openly and are understood between children and adults;
 - Promoting open lines of communication both internally and externally within and between organisations to improve awareness and implementation of child protection policies and practices;
 - Creating a framework to deal transparently, consistently and fairly with allegations concerning abuse.

- **Children’s participation – a space and a voice:** Child protection is not only about policies on paper. The best way to protect children is to empower them to protect themselves. Creating a space where children feel able and willing to speak out about abuse, free from abusers, empowers them to become actors in their own protection without further discrimination or shame. “Children have the right to communication – to enable them to receive information, to ask questions, to make choices, and to make decisions.” Cecily’s Fund believes that helping children to find a voice is an essential step to helping them to claim their individual rights. *Children will only benefit from this policy if they are aware of their rights and are given the proper environment in which to exercise them.*

- **Taking it further:** Child protection is not just about reading and signing a piece of paper: the policy sets out guidelines and standards that must be put into practice. These include, amongst other measures: recruitment procedures, review of management structures, creation of a space for children to speak out, staff training, and development of transparent protocols. *‘Above all, it must be remembered that it is the children, not the standards, that are sacrosanct; and although abuse must never be tolerated, the standards are no more than a tool in the service of promoting the welfare of children.’*

- **Capacity building:** Cecily’s Fund understands the need for capacity building on issues of child protection and appreciates the constraints and conditions under which organisations operate. Cecily’s Fund is committed to undertake such capacity building in partnership with others.

- **Challenging complacency:** Resistance to addressing child protection issues may come from lack of understanding of the nature of child abuse, lack of commitment to Cecily’s Fund / programme, and a sense that child abuse happens elsewhere. Organisations should ask themselves: “If safety and wellbeing of children are not at the centre of Cecily’s Fund’s programme / activities, then why not?” ‘It is unfortunate and unacceptable that it will take a horrendous incident to shock some organisations into action’. Cecily’s Fund will challenge complacency as a matter of course.

Core Safeguarding Principles

Safeguarding both adults and children is about preventing the risk of harm from abuse or exploitation or having the ability to reduce it by raising awareness and supporting people in making informed decisions. Safeguarding is everyone’s business and accountability makes sure that everyone plays their part when it comes to safeguarding vulnerable people. Everyone is accountable for their actions as individuals, services and organisations.

We follow the UK Government six safeguarding principles specially to help better protect vulnerable adults.

Together, the principles are an aid to understanding actions that need to be taken to protect people and are agreed within the Care Act 2014.



1. Empowerment

Ensuring people are supported and confident in making their own decisions and giving informed consent.

Empowerment gives individuals choice and control over decisions made.



2. Protection

Providing support and representation for those in greatest need.

Ensuring our local partners put measures in place to help stop abuse from occurring and offer help and support to those at risk



3. Prevention

We aim to try and take action before harm occurs, preventing neglect, harm or abuse by raising awareness, training staff and making information easily accessible for beneficiaries and staff.



4. Proportionality

We adopt a proportionate and least intrusive response to the issue presented and take each person into account when dealing with abuse. We will respect each individual and assess any risks presented.



5. Partnerships

We will form partnerships with local community organisations that can assist in preventing and detecting abuse.



6. Accountability

We will be accountable and have complete transparency in delivering safeguarding practice.

- **These principles underlie all of the following standards set out in this document.**

4 Who is bound by the Policy?

4.1 Cecily's Fund

4.1.1 Staff

- Cecily's Fund staff (those with paid full and part-time positions within the organization), are bound to the commitment not only to abide by, but also to understand and promote the policies, guidelines, principles and practice of children's protection in a child rights context. It is crucial that the staff of Cecily's Fund uphold the highest standards of professional and ethical behaviour while working with Cecily's Fund, including in their personal lives, because the actions of the staff members reflect the principles of Cecily's Fund.
- This document outlines the recruitment procedures for new staff members (see Section 5.1).
- The format of management structure is outlined in Section 5.3. Direct lines of communication throughout the staff must be implemented and a specific person assigned to be in charge of child protection issues.
- Each staff member will be:
 - Required to obtain a DBS standard disclosure check (if geographical jurisdiction of the CRB applies);
 - Expected to sign the appropriate Statement of Commitment to Cecily's Fund Child Protection Policy as a condition of employment

- Expected to sign a personal declaration stating any criminal convictions, including those considered 'spent';
- Expected to provide 2 contacts for referees that can be verified by telephone;
- Expected to attend all child protection training provided by Cecily's Fund.

4.1.2 Volunteers

- Cecily's Fund volunteers are bound to the commitment not only to abide by, but also to promote the policies, guidelines, principles and practice of children's protection in a child rights context. It is crucial that volunteers of Cecily's Fund uphold the highest standards of professional and ethical behaviour whilst associated with Cecily's Fund, including in their personal lives, because the actions of volunteers ought to reflect the principles of Cecily's Fund. Volunteers are defined as people working directly with Cecily's Fund in its office in the UK or with its programmes and partners in Zambia.
- Because volunteers are often employed temporarily, managers of volunteers must stress the importance of child protection issues during initial induction training, and assess the actions of these workers, as part of Cecily's Fund's general management and monitoring procedures, to ensure the policy provisions are understood and followed correctly.
- Each volunteer will be:
 - Expected to sign the appropriate Statement of Commitment to Cecily's Fund Child Protection Policy as a condition of working with Cecily's Fund;
 - Expected to sign a personal declaration stating any criminal convictions, including those considered 'spent';
 - Expected to provide 2 contacts for referees that can be verified by telephone.

4.1.3 Trustees

- Cecily's Fund Trustees are bound to the commitment not only to abide by, but also to understand and promote the policies, guidelines, principles and practice of children's protection in a child rights context. It is crucial that the trustees of Cecily's Fund uphold the highest standards of professional and ethical behaviour whilst associated with Cecily's Fund, including in their personal lives, because the actions of the trustees reflect the principles of Cecily's Fund.
- Each Trustee will be:
 - Required to obtain a Criminal Records Bureau standard disclosure check (if geographical jurisdiction of the CRB applies) prior to making a visit to Zambia;
 - Expected to sign the appropriate Statement of Commitment to Cecily's Fund Child Protection Policy as a condition of appointment as a trustee
 - Expected to sign a personal declaration stating any criminal convictions, including those considered 'spent';
 - Expected to provide 2 contacts for referees that can be verified by telephone.

4.1.4 **Zambian Partners & External Contractors**

- Each individual or organisation whose services are used by Cecily’s Fund, and which include direct or indirect contact with children, such as consultants or contractors, will be made aware of Cecily’s Fund Child Protection Policy by being issued a copy of the Zambian Partner / contractor version of the Policy.
- If the type of work carried out involves **direct contact** with children, the following standards shall apply:
 - Each partner/contractor will be:
 - Expected to sign the appropriate Statement of Commitment to Cecily’s Fund Child Protection Policy as a condition of the contract (whether organisation and individual);
 - Required to obtain a Criminal Records Bureau standard disclosure check (if geographical jurisdiction of the CRB applies) (applies only to individual contractor);
 - Expected to sign a personal declaration stating any criminal convictions, including those considered ‘spent’ (applies only to individual contractor);
 - Expected to provide 2 contacts for referees that can be verified by telephone (applies only to individual contractor).
- If the type of work carried out involves **indirect contact** with children and/or information regarding children, the following standards shall apply:
 - Each contractor will be:
 - Expected to sign the appropriate Statement of Commitment to Cecily’s Fund Child Protection Policy as a condition of the contract (whether organisation and individual);
 - Expected to sign a personal declaration stating any criminal convictions, including those considered ‘spent’ (applies only to individual contractor);
 - Expected to provide 2 contacts for referees that can be verified by telephone (applies only to individual contractor).
- Individuals and organisations who work for Cecily’s Fund more than once in any one year period are covered by their original Child Protection Policy commitments. Individuals or organisations who carry out work for Cecily’s Fund again after one year will be required to recommit to our Child Protection Policy, conforming again with the requirements set out above.
- If the type of work carried out involves **no contact** with children, and no access to information regarding children, (e.g. office cleaner, accountant, auditor), then no formal procedure is necessary.

4.1.5 **Responsibility for children brought from overseas to the UK**

- In general, children’s participation is best developed by working with children within their own environments and in the context of their own social support structures. Children’s participation should be integrated into programming on an on-going basis as much as possible rather than being confined to participation in one-off events and consultations, especially those that take place outside the child’s local context. With this in mind, any decision to invite children to attend events in the UK must be taken in the best interests of the child with serious consideration given to the objectives and implications.
- If Cecily’s Fund undertakes any initiative (whether in a funding or facilitating role) to bring children from overseas to the UK for any purpose (e.g. attending conferences, exchange visits, consultations), both Cecily’s Fund as a whole, as well as the individuals entrusted with the direct care of the children are responsible for ensuring compliance with all relevant aspects of this policy. The child / children will be accompanied by a designated chaperone at all times.
- The individuals entrusted with the direct care of the children must:
 - Satisfy the procedures listed above in Section 4.1-4.4 including signing the relevant Statement of Commitment to Cecily’s Fund’s policy, undergoing standard CRB disclosure (if geographic jurisdiction applies), providing a personal declaration of criminal convictions and 2 contacts for referees that can be verified by telephone;
 - Receive a specific briefing - in relation to the exact circumstances of the project - from Cecily’s Fund’s designated child protection person; this briefing should include refresher training on Cecily’s Fund’s Code of Behaviour, and ample opportunity for clarifying child protection principles and procedures;
 - Be provided with contact details for 24-hour emergency support within Cecily’s Fund for the duration of the child / children’s visit, as well as external emergency contact details (e.g. medical).
- Individuals within Cecily’s Fund who are likely to come into contact with such children in the context of visits from overseas should, in addition to complying with the general policy requirements, receive refresher training on Cecily’s Fund’s Code of Behaviour.
- Representatives of Cecily’s Fund shall disseminate and promote copies of the Code of Behaviour in all situations where Cecily’s Fund is responsible for bringing children in contact with adults.

4.2 Overseas organisations and individuals under indirect UK responsibility

Cecily’s Fund members’ partners:

Will be expected to comply with Cecily’s Fund child protection standards, supported by the capacity building commitment outlined in this policy.

4.3 An individual on project visits (e.g. donors, journalists, researchers and sponsors):

- Anyone travelling overseas either as a representative of Cecily's Fund, or where Cecily's Fund is responsible for that person, e.g. supporter visits, donors, journalists and researchers, and who will have direct or indirect contact with children during the project visit, will be:
 - Expected to sign the appropriate Statement of Commitment to the project visit version of Cecily's Fund Child Protection Policy as a condition of the visit;
 - Expected to sign a personal declaration stating any criminal convictions, including those considered 'spent', and declaring any previous investigations or allegations made against them with respect to child protection issues;
 - Expected to provide 2 contacts for referees that can be verified by telephone;
 - Expected to receive a specific briefing - in relation to the exact circumstances of the visit - from Cecily's Fund's designated Child Protection Officer; this briefing should include training on Cecily's Fund Code of Behaviour and Cecily's Fund Communication Guidelines (including use of images); in the case of journalists, they will also be issued a copy of any additional media guidelines that may be produced in the future.

5 Cecily's Fund SAFEGUARDING POLICY

Our vision is to operate a safe, transparent, organisation that protects both children and vulnerable adults. We will work towards this by developing and implementing policies and procedures, to the best of our ability, to ensure the respect and wellbeing of children and vulnerable adults who come into contact with our organisation. The implementation of this policy and the guidelines outlined below should be based on a spirit of positive commitment at all times to the best interests of the child and any vulnerable adult.

This document will be reviewed and updated a minimum of once every two years or whenever there is a major change in Cecily's Fund or in relevant legislation, to guarantee the best available policies for child protection.

5.1 Personnel Recruitment Procedure

There will be a thorough and standardised process within Cecily's Fund that applies to the recruitment of all employees, contractors, trustees, officers, volunteers, whether paid or unpaid, full-time or part-time, temporary or long-term, having direct or indirect contact with children. The process shall include:

- Advertisements for vacancies that clearly state that a child protection and safeguarding adults policy, including screening procedures, is in place.
- A candidate specification that accompanies each job description, against which applicants are judged, to ensure that the best candidate for the job is selected, above and beyond child protection considerations.
- A standard or enhanced disclosure (depending on level of contact with children) through the Criminal Records Bureau (if geographical jurisdiction of the CRB applies). Police checks will be considered to be valid for 3 years, although repeat police checks should be requested before this time should suspicions arise.
- The requirement for the potential employee to read, understand and accept compliance with Cecily's Fund's Child Protection Policy and guidelines as part of the terms and conditions of employment.
- The requirement for the potential employee to sign a personal declaration stating any criminal convictions, including those considered 'spent'.
- The required minimum of two-character references (excluding family members and those who have known the applicant personally for less than 2 years) that can be verified by telephone.
- A standardized interview process which includes:
 - One member of the recruitment panel will have undergone recruitment training specifically focussed on the issues of child protection.

- Specific questions at interview on child protection and the candidate's commitment to, and respect for, child protection policies and procedures as well as the candidate's motivation for working with children.
- Attentiveness to anything suspicious in employment history (including gaps), and the use of telephone references to clarify any areas of concern.
- In the case of trustee recruitment, applicants should be required to sign a general 'Declaration of Qualification for Trusteeship' which should include specific mention of compulsory compliance with Cecily's Fund's child protection policy

5.2 Education and Training

Cecily's Fund will encourage opportunities to question and learn about child protection and safeguarding issues. There will be opportunities within Cecily's Fund to develop and maintain the necessary skills and understanding to safeguard children. The opportunities shall include:

- An induction process for all employees, contractors, trustees, officers, interns and volunteers which includes: familiarisation with the Child Protection Policy and procedures; opportunities to learn about the nature of abuse, the effects of abuse and how to recognise and respond to concerns about child abuse; information and support on who to contact in the event of any concerns about child protection issues.
 - New employees, contractors, trustees, interns and volunteers should receive child protection training as soon as possible (and at least within 3 months) of taking up their position.
 - Existing employees, contractors, trustees, interns and volunteers should receive child protection training within a designated time period (and at least within 3 months) of the Child Protection Policy coming into force.
- Employees, contractors, trustees, officers, interns and volunteers who will have direct contact with children either in the UK (e.g. through school or youth group contact) or overseas (e.g. through project visits) must be fully trained on Cecily's Fund's behaviour protocols and guidelines and must be clear on who to contact in the event of any concerns.
- Employees, contractors, trustees, officers, interns and volunteers who have access to information about children such as personal contact information, including their addresses, specific cases or incidents or any other details of a child's personal life, must be trained to understand fully what constitutes acceptable and unacceptable sharing of information regarding children.
- It is recognised that this training and the topic of child abuse are of a sensitive nature and may raise personal issues for our staff. It is not our wish to upset our staff and so Cecily's Fund will endeavour to offer staff individual support or refer them to agencies with experience supporting survivors of child abuse or other members of staff who are finding child protection training challenging.

- A constant re-evaluation of circumstances regarding training and policy procedures will be administered, assuring a constant, up-to-date awareness of child protection issues within Cecily's Fund.

5.3 Programme Design

Risk assessments of harm to children and vulnerable adults will be undertaken in all programme design when developing new interventions and subsequent measures put in place to ensure that the most vulnerable are protected and that risk is minimized.

5.4 Management Structure

There will be a specific management process adopted in order to facilitate implementation of the safeguarding policy and procedures. The structure shall include:

- Cecily's Fund will have open lines of communication where understanding abuse and listening and responding to concerns are the main priority. It will create an atmosphere of support and encouragement for those who feel it necessary to report concerns, as child protection is a difficult issue to confront. It will promote a positive environment for giving and receiving feedback.
- The management will reflect the organization's core principles and values, upholding a professional approach toward child protection issues and demonstrating awareness of matters of abuse.
- Trustees must take responsibility to assure themselves that Cecily's Fund's Child Protection & Safeguarding Policy is being implemented.
- A person who is responsible for the implementation of the child protection and safeguarding policy will be designated. This role should reflect the nature and structure of Cecily's Fund and the person should have sufficient seniority and support to carry out the role. At each appropriate level or setting in Cecily's Fund there should be a named person/s to whom people can talk about child protection matters.
- The responsibilities of the designated child protection person in an organisation may include:
 - Promoting awareness and implementation of the policy throughout Cecily's Fund.
 - Monitoring implementation of the policy and reporting annually to Cecily's Fund's trustees / management board.
 - The development of child protection training resources as required.
 - Maintaining knowledge of best practice and statutory requirements.
- On-going supervision, monitoring and support of individuals working directly with children, or with direct access to information on children will be integrated into the regular schedule of the supervisor / line manager.

- Regular, formal staff evaluations will include an opportunity to discuss child protection issues.
- Regular internal and external project inspections are recommended to ensure objectivity and transparency. External monitoring and feedback is not only beneficial as a child protection measure, but also as a way to constantly reevaluate the structures and efficiency of an organisation's programmes and projects as a whole.
- The disclosure of personal information about children, including legal cases, should be limited to those employees, contractors, trustees, officers, interns and volunteers who need to know.

5.5 Behaviour Protocols

- There is a Code of Conduct appropriate to the circumstances of Cecily's Fund to protect any child from abuse. The Code of Conduct includes guidance on appropriate / expected standards of behaviour of adults towards children, and also of children towards other children.
- The Code shall be prominently displayed / easily accessible for all organisation representatives.
- Representatives of Cecily's Fund shall disseminate and promote copies of the Code of Conduct in all situations where Cecily's Fund is responsible for bringing children in contact with adults.

5.6 Communication Guidelines

- Access to printed and electronic personal information about children should be restricted to the minimum number of people who need to know within Cecily's Fund. Personal and physical information that could be used to identify the location of a child within a country and cause them to be put at risk should not be used on Cecily's Fund's website or in any other form of communication for general or public purposes. Any youth web forum that may be established should be monitored closely to ensure that children do not place identifying information about themselves on it. Any such information will be removed by Cecily's Fund staff as soon as they are aware of it.
- Cecily's Fund will provide guidance for staff on the use of social media and communicating with children and other beneficiaries. Staff are not allowed to use private messaging platforms to communicate with children or other beneficiaries.

Every child has a right to be accurately represented through both words and images. Cecily's Fund's portrayal of each child must not be manipulated or sensationalized in any way. Children must be presented as human beings with their own identity and dignity preserved. Text and images included in any print, broadcast or electronic materials such as brochures, publications, reports, videos or websites should depict an accurate and balanced depiction of children and their circumstances.

As far as possible, people [including children] should be able to give their own accounts rather than have people speak on their behalf, and people's [including children's] ability to take responsibility and action for themselves should be highlighted.

- Avoid:
 - Language and images that could possibly degrade, victimise or shame children;
 - Making generalisations which do not accurately reflect the nature of the situation;
 - Discrimination of any kind;
 - Taking pictures out of context (e.g. pictures should be accompanied by an explanatory caption where possible).
- In images, children should be appropriately clothed and not depicted in any poses that could be interpreted as sexually provocative.
- To the greatest extent possible, Cecily's Fund should acquire informed consent / the permission of the child, child's guardian and/or NGO responsible for the child in order to use the image for publicity, fundraising, awareness-raising or other purpose (which should be made clear to the consent-giver).
- Individuals or organisations requesting the use of Cecily's Fund's resources such as photographs will be required to sign an agreement with Cecily's Fund as to the proper use of such materials. The agreement may include a statement that any use of such materials for purposes other than what is agreed upon could subject the borrowing individual or organisation to legal action. Furthermore, failure to adhere to the agreed use of the material will result in the immediate termination of our permission to use the subject materials and/or require immediate return of all materials (including any copies made) provided by Cecily's Fund.

5.7 Reporting and reaction protocol

There is a process for reporting and reacting to witnessed, suspected or alleged child abuse and/or violation of the Child Protection Policy which is made available to, and understood by, all employees, contractors, trustees, officers, interns and volunteers. For organisations working directly with children, children themselves should be made aware, in a language and age-appropriate way that they understand, what to do if they feel uncomfortable and want to report something. The process includes:

- The guiding principle that the best interest of the child, the need to ensure the immediate physical and psychological safety of the child, and the desire to secure the best outcomes for the child should always govern decisions regarding what action should be taken in response to concerns. Child abuse aims to disempower children. Cecily's Fund aims to restore that empowerment by allowing children to govern as much as possible decisions regarding action that is taken in light of concerns or allegations.
- Guidance on dealing with allegations from a child or vulnerable adult that ensure that they are treated with respect:

Allegations from a child or vulnerable adult

If you are informed by a CF beneficiary or other individual that he/she is uncomfortable or concerned with a specific person's (adult or child) behaviour towards them or another child, the following steps must be taken:

- Reassure them that they were right to report the behaviour.
 - Listen carefully and calmly to them and ask questions to clarify the allegation so that you will be able to later report the incident correctly.
 - During the conversation, try not to repeat the same questions to the child, as this gives the child the impression that they did not give correct information the first time and they are not fully believed.
 - Do not promise secrecy to the child. Inform the child that you must report the incident or inappropriate behaviour as it is in their best interest.
 - Take proper steps to ensure the physical safety and psychological wellbeing of the child. This may include referring them for medical treatment or to a psychologist.
 - Make certain you distinguish between what the child has actually said and the inferences you may have made. Accuracy is paramount in this stage of the procedure.
 - Do not permit personal doubt to prevent you from reporting the allegation to the proper supervisor.
 - Let the child know what you are going to do next and that you will let them know what happens.
-
- Guidance on confidentiality and information sharing which clarifies that the protection of the child or vulnerable adult is the most important consideration. This includes a standardised system for reporting incidents, concerns and referrals and storing these securely. Records should be signed and dated. [...] Records must be kept securely in a locked place to which access is restricted. Managers have a particular responsibility in maintaining the confidentiality of these records and must ensure that the records, or any information they contain, are made available only to relevant parties. The transfer of information – verbally, through the mail, electronically, etc. – should be done in such a way that confidentiality is maintained.
 - Cecily's Fund must take appropriate steps within its power to protect the child / children/adult in question from further harm. If your concerns involve immediate harm to a child, act without delay, as inaction may place the child in further danger. If you know any information about the maltreatment of a child or vulnerable adult, it is your responsibility to tell someone. All employees, contractors, trustees, officers, interns and volunteers must therefore act immediately and report suspicions, however uncertain, to the designated person (or alternate designated person) in accordance with Cecily's Fund's reporting procedure (refer to flowchart and response form). The designated person may in turn seek guidance on further action in the local context (if overseas) or from local social services and the police (if in the UK).
 - In certain instances, there will be the obligation for Cecily's Fund and its staff and others to report concerns to the appropriate external bodies. This will usually occur as a consequence of the reporting

procedure. However, if urgent action is required in order to protect children then it may be prior to the reporting procedure.

- Relevant contact details for child protection services, local social services department, police, emergency medical help and helplines (e.g. NSPCC) will be readily available and easily accessible to organisation representatives.
- Arrangements will be made for providing supervision and support to employees, contractors, trustees, interns and/or volunteers during and following an incident or allegation.
- **Action in the UK:** The responsibility for investigating allegations of child or adult abuse in the UK (and many other countries) rests with the Police and local Social Service Department. Cecily's Fund's designated child protection person / officer will usually seek the advice of the Social Services, Police or NSPCC in deciding whether a formal referral to Social Services is necessary. Police and Social Services procedures will then be followed. If it is decided that external reporting should not take place then there must be a clear rationale for that decision which should be recorded. The decision not to report in such circumstances should be unanimously approved by the Director and the designated trustee for safeguarding.
- **Action overseas:** Communication with the relevant local partner will be considered appropriate. The focus of this further communication will be to ensure that the local partner organisation is aware of the concerns raised and to seek further clarification of the organisation's Child Protection & Safeguarding Policies and procedures.

6 Cecily's Fund Code of Conduct

- The Code of Conduct should be interpreted in a spirit of transparency and common sense, with the best interests of the child and vulnerable adult as the primary consideration.
- CECILY'S FUND staff must make an attempt to understand the local norms around physical contact between children and adults.

Minimising risk situations:

- **Try to:** avoid placing yourself in a compromising or vulnerable position; be accompanied by a second adult whenever possible; meet with a child in a central, public location whenever possible; immediately note, in a designated organisational Child Protection Log Book or incident report sheet, the circumstances of any situation which occurs which may be subject to misinterpretation; keep in mind that actions, no matter how well intended, are always subject to misinterpretation by a third party.
- **Try not to** be alone with a single child, including in the following situations: in a car (no matter how short the journey); overnight (no matter where the accommodation); in your home or the home of a child. Do not show favouritism or spend excessive amounts of time with one child.

Sexual behaviour:

- **Do not:** engage in or allow sexually provocative games with children to take place; kiss, hug, fondle, rub, or touch a child in an inappropriate or culturally insensitive way; sleep in the same bed as a child; do things of a personal nature that a child could do for him/herself, including dressing, bathing, and grooming; encourage any crushes by a child.

Physical behaviour:

- **Do:** wait for appropriate physical contact, such as holding hands, to be initiated by the child.

Psychosocial behaviour:

- **Do:** Be aware of the power balance between an adult and child, and avoid taking any advantage this may provide.
- **Do not:** use language that will mentally or emotionally harm any child; suggest inappropriate behaviour or relations or any kind; act in any way that intends to embarrass, shame, humiliate, or degrade a child; encourage any inappropriate attention-seeking behaviour, such as tantrums, by a child; show discrimination of race, culture, age, gender, disability, religion, sexuality, or political persuasion.

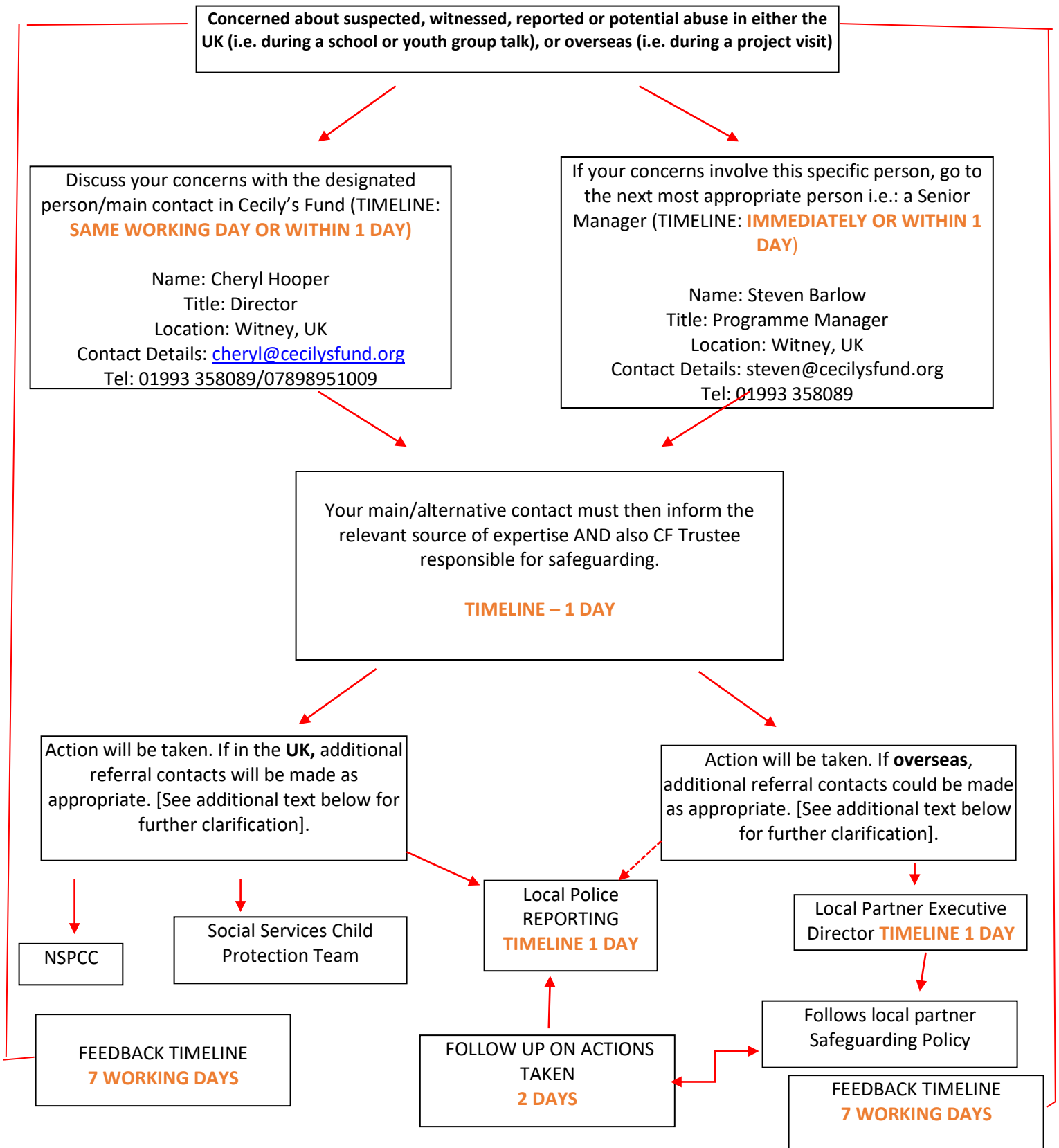
Peer abuse:

- **Do:** be aware of the potential for peer abuse; develop special measures / supervision to protect younger and especially vulnerable children; avoid placing children in high-risk peer situations (e.g. unsupervised mixing of older and younger children).
- **Do not:** allow children to engage in sexually provocative games with each other.

Physical environment:

- **Do:** develop clear rules to address specific physical safety issues relative to the local physical environment of a project (e.g. for projects based near water, heavy road traffic, railway lines).

7 Management Flowchart for Reporting Suspected Abuse



8 Ramifications of Misconduct

It is a clear requirement for all designated representatives to be obliged to raise any child protection concerns at the first opportunity. Whilst staff are obliged to raise concerns, it is not their responsibility to investigate them as this will fall under the responsibility of Cecily's Fund's nominated safeguarding person detailed in the flow chart.

- If an allegation of a violation of the policies, guidelines, principles or practice of child protection is made concerning a named individual from a verifiable source against any employee, contractor, trustee, officer, intern or volunteer, they may be suspended from all activity / association with CECILY'S FUND pending the outcome of an independent investigation. Staff will continue to receive full pay during this time.
- Depending on the outcome of the independent investigation: if it comes to light that anyone associated with Cecily's Fund commits acts in relation to children or vulnerable adults – whether within or outside the context of Cecily's Fund's work – which are criminal, grossly infringe children's rights, or contravene the principles and standards contained in this document, *Cecily's Fund will take immediate disciplinary action and any other action which may be appropriate to the circumstances.* This may mean, for example, for:
 - Employees – disciplinary action / dismissal
 - Volunteers, trustees, officers and interns – ending the relationship with Cecily's Fund
 - Partners – withdrawal of funding / support
 - Contractors – termination of contract
- Depending on the nature, circumstances and location of the case, Cecily's Fund will also consider involving authorities such as the police to ensure the protection of children and criminal prosecution where this is appropriate.
- The decision to suspend is not subject to challenge. When investigating and determining the concerns or complaints, the process should always be fair and any adverse determination should be open to challenge through an appeals process.