

## **WCIA Safeguarding Policy**

The purpose of this policy is to protect all people, particularly women, girls, boys and at risk adults, from any harm that may be caused due to their coming into contact with the WCIA or its partners. This includes harm arising from:

- The conduct of staff or personnel associated with WCIA
- The design and implementation of WCIA programmes and activities

The policy lays out the commitments made by WCIA and informs staff and associated personnel of their responsibilities in relation to safeguarding. These policies should be read in conjunction with WCIA's policies on preventing harassment and bullying, preventing violence in the workplace and on-line safety as set out in the Employee Handbook.

This policy has been developed in accordance with:

- DFID's enhanced Safeguarding standards
- UN special measures for prevention of sexual exploitation and abuse
- UN Convention on the Rights of the Child (UNCRC).
- Equalities Act 2010
- Social Services and Wellbeing (Wales) Act 2014 and associated Safeguarding Procedures

## **Covid 19**

WCIA and partners have adapted working practices to take into account the dangers posed by Covid 19. The safeguarding policy continues to apply to all staff including where activities have been moved on-line or where public events are hosted virtually. All staff should retain the same level of professionalism and courtesy, including appropriate standards of dress and language, when appearing on-line from home.

Where WCIA on-line events are open to the general public, a minimum of two staff should be present on-line unless exceptional circumstances apply. At the start of any public event a reminder will be given to all participants that;

- WCIA operates a safeguarding policy which is available on request and through the website;
- WCIA will not tolerate any form of offensive or abusive behaviour, including in comments posted in on-line event chat boxes;
- WCIA reserves the right to mute and/or remove participants who present a safeguarding risk to staff or other participants.
- WCIA operates an established complaints policy which can be accessed by members of the public, in addition to the whistle blowing policy. Details of the policy are available on the website.

## **What do we mean by safeguarding?**

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

In the international sector, we understand it to mean protecting people, particularly women, girls and boys from harm that arises from coming into contact with our staff or programmes.

## Scope

The WCIA recognises its duty to ensure that everyone taking part in WCIA activities are safe from harm and that children in particular are appropriately cared for. This policy covers all areas of the WCIA's work and aims to encourage the widest possible implementation of safeguarding standards.

This policy applies to all contracted WCIA staff and associated personnel including but not limited to Trustees, grantees, contractors, consultants, volunteers, researchers, programme visitors or anyone appointed to represent the WCIA or its work in any capacity in Wales or overseas.

This policy does not cover safeguarding concerns arising in the wider community not perpetrated by WCIA or associated personnel.

## Policy Statement

WCIA believes that everyone we come into contact with, regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity status, race, religion or belief, sex or sexual orientation<sup>1</sup> has the right to be protected from all forms of harm.

WCIA values diversity and will not tolerate any form of abuse, exploitation, bullying or harassment committed by staff or any associated personnel. Abuse can happen and be successfully hidden because of unequal power relationships in the work environment. We will give power to those using our services ensuring that everyone we work with has a voice.

WCIA aims to foster a safe environment for everyone and to encourage physical and mental wellbeing throughout all our activities, whether on-line or in person. We encourage transparency, open dialogue and commit to addressing concerns wherever and whenever they arise.

WCIA commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response. As part of this policy, WCIA will implement a system of mandatory reporting, applicable to all staff and associated personal for the safety of all.

## Code of Conduct

All WCIA staff, volunteers, grant recipients, partners and associated personnel are **prohibited** from engaging in the following harmful behaviour, including but not limited to:

- Any activity that is intended to cause physical or emotional harm, neglect, humiliation or exploitation to any individual.
- Any behaviour or activity that could amount to sexual exploitation or abuse.
- Sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour
- Any activity, practice or behaviour that suggests staff, grant recipients or partners have abused their position of power and is engaging any individual based on inherently unequal power dynamics.
- Sexual relationships between staff, grant recipients, partners and any individuals that are based on unequal power dynamics are strongly discouraged since they may undermine the credibility and integrity of the work of the WCIA.
- Use of the organisation's computers or other equipment to view, download, create or distribute inappropriate material, including but not limited to pornography.

## **Prevention**

### ***Staff recruitment and monitoring***

The WCIA will never knowingly employ somebody who is barred from, or unsuitable for, working with the general public or with children. All measures will be taken to ensure that staff and associated personnel do not pose a safeguarding risk. The following specific measures will be taken:

- A commitment to safeguarding will appear as standard in all future job descriptions and job adverts.
- We will ask appropriate screening questions during the selection process for posts within the bounds of the Equalities Act
- The WCIA will require at least one reference for all paid positions and for volunteers where the position requires working with children. Any non-committal references will be followed up by phone and employment/volunteer status will not be confirmed until satisfactory references have been received.
- We will keep a record of the names, addresses, recent addresses and dates of birth of all staff for 5 years from their last day of employment, and will apply a minimum probationary period of 3 months in all cases.
- All staff working with children and vulnerable adults in the UK, or travelling overseas under any circumstances will be subject to a mandatory DBS check. Checks will re-occur within 3 years, or upon renewal of a contract for relevant posts.
- In the event that WCIA makes a decision to employ a person with previous convictions of historical offences which may cause safeguarding concerns, all necessary safety measures will be put in place to prevent harm. This may

include consensual disclosure of information relating to offences to other staff or specifically ensuring that a staff does not work with children.

## **Staff training and awareness**

The WCIA will:

- Ensure that all staff and associated personnel are aware of and understand the safeguarding policy;
- Ensure that all staff and associated personnel having signed the Code of Conduct and understand their responsibilities with regards to mandatory reporting;
- Provide all members of staff with basic training in safeguarding including on their roles and responsibilities and arrange for staff to take part in externally organised courses where appropriate;
- Ensure that refresher training is provided at regular intervals;
- Ensure that copies of the All Wales Child Protection Procedures and Independent Safeguarding Authority Referral Guidance are available to staff;
- Ensure that reporting information including named focal points are kept up to date and staff are informed of changes;
- Ensure that referral and service provider information is kept up to date and focal points are informed of changes;

## **Specific provisions for working with children**

WCIA staff may work with children in schools/colleges or at educational events. Children may also work as volunteers inside or outside the office.

The welfare of all children involved with any of our activities is the first priority of the WCIA and associated personnel. If any staff member or associated person “has knowledge, concerns or suspicions that a child is suffering, has suffered or is likely to be at risk of harm, it is their responsibility to ensure that the concerns are referred to social services or the police, who have statutory duties and powers to investigate and intervene when necessary.” (All Wales Child Protection Procedures 2008, section 2.1.1).

The WCIA will ensure that, during any work with children:

- All staff will treat children and young people with care and respect; this includes speaking to children with respect and avoiding language or comments which could be interpreted as derogatory or salacious;

- All staff will observe physical boundaries and will not touch children in any way unless it is necessary;
- In all cases where children are in the direct care of the WCIA (rather than in the care of a school or other organisation), the parents or carers of children attending activities will consent to their participation and be aware of their location at all times;
- No staff should be alone with an individual child where they cannot be seen by others, except where this is appropriate under the All Wales Child Protection Procedures
- At least one other teacher or WCIA staff member should be present in the room when working with children in schools or colleges;
- No staff should give lifts to children on their own (other than for short journeys up to 5 minutes when they will sit on the back seat) without parental consent. Staff are responsible for ensuring that they have adequate insurance to transport others for work purposes.
- Staff will follow Safeguarding guidelines for online working.

### **Specific Provision for Long Term volunteers**

WCIA deploys volunteers within Wales and overseas. All long term volunteers are over the age 18 and subject the terms of this policy and its related Code of Conduct. All volunteers will be given a safeguarding orientation as part of standard pre-departure deployment and be made aware of the following;

- WCIA's policy on mandatory reporting;
- How and where to make a report in Wales, including full contact details of the WCIA focal point;
- How and where to make a report in their host country, including full details of safeguarding procedures in partner organisations;

Any volunteer deployed by WCIA retains the right to contact the WCIA safeguarding focal point, the project lead or the WCIA Chief Executive to report a safeguarding incident, regardless of their deployment country, or the relationship with their host organisation.

This mechanism should only be used for the most serious safeguarding incidents, for example sexual assault, and volunteers should normally report in the first instance to their host organisation.

Where volunteers are deployed outside of the UK, the relevant WCIA partner organisation is primarily responsible for guiding the safeguarding process and should provide necessary information and checks. However, WCIA should also

satisfy itself that the placement offers an appropriate level of safeguarding including emergency contacts and reporting mechanisms as appropriate.

In the event of a report being received from a volunteer placed overseas, WCIA will liaise with the host organisation to provide all necessary support, including arranging immediate return to the UK where requested.

WCIA will ensure the appropriate care and referral services are in place for volunteers returning to the UK following a safeguarding incident.

## **Working with partners**

WCIA will encourage best practice in safeguarding to all our partners. Where appropriate, we will ask partners to provide their Safeguarding policies and practices for review before entering into a partnership agreement.

Where partners are unable to provide comprehensive policy documents or documents do not meet satisfactory standards, we may require partners do adopt the WCIA safeguarding policy and/or ask partners to sign the WCIA Safeguarding Code of Conduct.

We may also require grantees and contractors to have specific child protection measures in place where appropriate, including mandatory DBS checks for partner staff.

## **Response**

### ***Mandatory reporting***

All WCIA, Trustees and associated personal are required to immediately report any violations or suspected violations of the safeguarding policy to a nominated focal point or to the Chief Executive. All reports should be made in good faith and malicious or deliberately false accusations may result in disciplinary action.

Staff reporting any concerns should maintain confidentiality before, during and after an investigation has taken place. It is not the responsibility of individual staff to make an assessment of the situation, but they should pass their concerns on.

WCIA will endeavour to provide maximum support to staff raising concerns. All reports will be treated in the utmost confidence and will be thoroughly investigated.

In the event that a staff is aware of a breach of the safeguarding policy which leads to a staff or project participant being harmed, failure to report may result in disciplinary proceedings.

### ***Whistle blowing***

Where a member of staff or associated person has a concern:

- That an adult or child may be being abused or at risk of harm, or;
- That an adult working with or alongside WCIA may pose a risk of harm to adults or children.

they should immediately contact the safeguarding focal point or CEO, or in their absence the relevant trustee, either face to face, or through the email addresses or telephone number specified below.

## **External complaints**

Where a member of the public has a concern about the conduct of WCIA staff or associated personnel, they should immediately contact the CEO or safeguarding focal point, or Chair of the Board, through contact details provided on the website.

## **Contact details**

**Claire o'Shea**

02920 821 057

[claireoshea@hubycymruafrica.org](mailto:claireoshea@hubycymruafrica.org)

**Susie Ventris-Field**

07495522387

[SusieVentrisField@wcia.org.uk](mailto:SusieVentrisField@wcia.org.uk)

**Peter Sargent**

[petersargent@wcia.org.uk](mailto:petersargent@wcia.org.uk)

In the event of an emergency or an immediate risk of significant harm, a member of staff should report the case externally to emergency services. If there is no immediate risk, the case should be dealt with internally through the safeguarding procedures.

## **Responding to a concern or allegation**

The safeguarding focal point, or CEO, will take all concerns and allegations of abuse seriously and will respond appropriately in order to ensure the safety of anyone who comes into contact with WCIA.

A meeting will be held by telephone, or in person as appropriate, within 24 hours, to assess the concern and consider if further information is required.

A case report will be opened within 24 hours using the WCIA incident reporting form (Annex A), recording all details of the alleged incident.

Any WCIA representative who believes a child or adult is in immediate danger of significant harm in the UK should contact the police by phoning 999.

## **Reporting incidents in the UK**

## **In the case of a child**

If the allegation is related to a safeguarding concern against a child in the UK, the safeguarding focal point or CEO must report all allegations of abuse against staff working in the United Kingdom to the Local Authority Designated Officer within 24 hours of the allegation coming to light (see Annex D for contact details).

- WCIA will report allegations when there is *reasonable cause to suspect* abuse, neglect or harm. WCIA may delay making a report to check whether there is enough information to constitute reasonable cause following initial discussions about a concern. The delay should be time limited.
- WCIA may determine that the issue can best be addressed by an internal response; improved supervision, a training event, or that it is a malicious report or a misinterpretation of the situation. The situation and the response should be logged, reviewed by the CEO and a time bound plan should be put in place to monitor for the required improvement.

## **Consent**

There is no legal requirement to seek consent when making a safeguarding report involving a child. However, it is considered good practice to seek a child's consent, where it can be reasonably obtained, to make a report on their behalf to Social Services or relevant safeguarding bodies in overseas countries, subject to their age and understanding.

Where consent is refused, this should be noted on the report form shared with Social Services / relevant in country authority. A report may be made without consent where:

- a crime has been committed;
- the situation, if not reported, would put other people at risk of similar abuse (e.g. the suspected perpetrator is known to be working with other people who are at risk in similar circumstances);
- the individual is subject to undue influence (possibly from the perpetrator or a person with an interest in protecting them), pressure or coercion, which discourages them from giving consent.

If a report is made, the child should be informed of what actions will be taken and why, and contact maintained (if possible) with the individual to reassure them and offer support throughout the process.

If WCIA does not make a report, this decision should be recorded and the safeguarding focal point or CEO should discuss next steps with the child and their parent/guardian, including referral to other agencies. The child and their parent/guardian should be reminded that they have the right to change their mind and a report can be made at a later stage.

## **In the case of an adult**



- In the case of an adult, WCIA may not report a concern to the relevant authorities, if the subject of the concern has the capacity to refuse support and/or referrals made on their behalf.
- It should be assumed that the adult has the capacity to make decisions for themselves unless this has been assessed otherwise, and the individual therefore has the right to be asked for, or to withhold, their consent.
- The individual has the right to change their mind and ask for a report to be made at a later date.
- The WCIA may make a decision to refer the incident to the police where it considers that a serious criminal offence has been committed.

All incidents will be thoroughly documented in WCIA's safeguarding tracking system, with priority given to the wishes and views of the individual affected with regard to reporting and service provision. Any decisions taken, including time limits and conditions for follow up, should all be logged and adhered to. Any deviations from the written plan should also be logged with appropriate explanations.

If WCIA does not make an external report, this decision should be recorded and the safeguarding focal point should discuss next steps, including how to best support that person through referrals where necessary. The individual should be reminded that they have the right to change their mind and a report could be made at a later stage.

## **Reporting allegations occurring overseas**

WCIA will only deploy people over the age of 18 on international volunteering placements. International travel may also be undertaken by WCIA staff on project visits, to attend meetings and conferences or to meet partners.

Where a staff or associated person reports an incident occurring outside of the UK, WCIA will follow the referral pathways identified by partners in their safeguarding procedures and will liaise with the relevant in country authorities to provide maximum cooperation.

Where the person reporting is a WCIA staff, WCIA will

- Provide immediate remote support, including information about how to access advice through Embassies and High Commissions and/or making a police report where necessary;
- Make immediate emergency arrangements to return the person to the UK;
- Advise on referral organisations within the UK;
- Seek to fully support the staff throughout the process;
- Fully document and record the response, using the incident report form;

Where the person reporting is a volunteer, WCIA will

- Seek assurances that the matter is being appropriately dealt by the proper authorities, including reporting to the police if appropriate;
- liaise with the volunteers host organisation to provide all necessary practical and logistical support;
- make immediate arrangements to return the volunteer to their home country where requested;

- ensure the appropriate care and referral services are in place for volunteers returning to their home country in the aftermath of a report;
- Seek to fully support the volunteer throughout the process;
- Fully document and record the response, using the incident report form.

Where the alleged perpetrator is a WCIA staff deployed overseas, the WCIA will demand the immediate return of the staff to the UK pending a full investigation. WCIA will provide full cooperation to any investigation taking place in any other country and keep appropriate records of all communications, including an incident report.

Following the outcome of an investigation, WCIA will apply its usual disciplinary procedures.

### **Reporting to the Charity Commission**

The WCIA Board of Trustees will be informed of all allegations of abuse (as defined above) involving a member of staff or associated personnel. The Board will be responsible for making a serious incident report to the Charity Commission as required by charity registration serious incident reporting.

Information will be kept anonymised and confidentiality will be protected as much as possible.

### **Disciplinary Measures**

Where a WCIA representative is the subject of an allegation the member of staff may be suspended until an investigation is completed. Suspension does not imply guilt but protects all parties. WCIA will apply appropriate disciplinary measures with due regard to employment law, including dismissal of staff found in breach of policy.

In such cases, WCIA will reach a decision based upon the information that is available which could suggest that on a balance of probability it is more likely than not that the allegation is true.

This may apply in cases where the matter has not been referred to the police, or where the police have decided to discontinue a criminal investigation, or not pursue a course of criminal action.

### **Support to survivors and staff**

WCIA will prioritise support to survivors of harm caused by staff or associated personnel, by sharing details of specialist agencies if appropriate and requested. When appropriate, the person raising the concern/allegation will be updated on progress and resolution, unless:

- the situation means WCIA must respect the privacy of individuals who may be affected;

- the survivor has expressly indicated a preference not to receive contact;
- the report has been made anonymously and this is not possible.

WCIA recognises that staff who have had to respond to a safeguarding allegation may find the situation stressful and upsetting. We will support our staff by providing an opportunity to talk through their anxieties with the safeguarding focal point and to seek further support as appropriate.

## **Confidentiality**

Appropriate levels of confidentiality must be maintained at all stages of the reporting process. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should be kept secure at all times.

Records are kept by the CEO in secure storage and only accessed by authorised persons upon request and for a legitimate purpose.

WCIA will only share information about a child with adults who have parental responsibility, unless this places the child at further risk of harm. Information may also be shared with a parent/guardian, where it is necessary in order to safeguard the child from harm.

WCIA staff and associated personnel must be aware that we have a professional responsibility to share information with other agencies in order to safeguard children. Information about an adult should be shared only with whom they have expressly requested it.

## **Communication of this policy**

WCIA will ensure that this policy is available to all staff and communicated to all partners and other associated personnel.

- Staff will be made aware of the safeguarding policy upon recruitment and will receive regular refresher training as part of their work. They will be required to sign the Code of Conduct and be able to communicate the policy to volunteers and partners as necessary.

Project partners and donors

- WCIA will ensure that reference to our safeguarding policy is included in all formal project documentation and that copies are available on request to donors and partners.

Project participants and the general public

- Information on safeguarding, including this policy will be signposted on the WCIA website and PDF versions available to be emailed by request.

- Participants to projects led or supported by the WCIA will be advised of their right to make a report about staff or service provision as part of WCIA's overall safeguarding responsibility.

## **Monitoring and Evaluation**

WCIA will regularly review the effectiveness of its safeguarding practice and assess knowledge and understanding of staff and stakeholders. All safeguarding decisions will be documented and reviewed capturing lessons learnt.

The WCIA Board of Trustees will review safeguarding issues as part of the quarterly monitoring of the safeguarding risk register. Review meetings will be held between the Safeguarding focal point and WCIA CEO where needed including to ensure that records are up to date and that systems to support staff are in place and effective.

Annex A – WCIA Safeguarding Report Form

Annex B – WCIA Safeguarding Referral Form

Annex C - Receiving reports

Annex D - List of Referral Services

Annex E - Glossary of Useful Terms

Annex F – Code of Conduct