



Safeguarding Policy

November 2020

Introduction

The purpose of this Policy is to help us to have a common understanding of safeguarding issues, develop good practice across Dhaka Ahsania Mission UK (DAM UK) and increase accountability in this crucial aspect of our work.

The Council of Management has agreed this Policy to provide clarity to all involved with DAM UK on our approach and standards of safeguarding with everyone we work with, including but not limited to children, young people and vulnerable adults. It is also intended to help us make sure that trustees, staff, consultants and volunteers are protected and to demonstrate how we meet our legal obligations. This Policy articulates:

- What safeguarding means for DAM UK and why it is important;
- Key aspects of safeguarding including culture, principles, recruitment and implications for partners;
- The responsibilities of trustees, staff, consultants and volunteers with respect to safeguarding.

This policy applies to all DAM UK trustees, staff, consultants and volunteers. It will be reviewed annually to ensure it remains fit for purpose.

Context

Safeguarding has grown to be a major issue in the international development sector in recent years. In the wake of revelations from international development charities, there has been increasing recognition of the way in which children, young people and vulnerable adults can be at risk of discrimination, neglect, abuse and exploitation by those who are in positions of trust and power over them, including through international development activities. In 2017, the Charity Commission published new guidance on safeguarding focused on the role of trustees.¹ This was followed by their summary of "10 actions trustee boards need to take to ensure good safeguarding governance".² DFID hosted an international conference on the topic in October 2018 and Bond published a 12 point commitment by

¹ <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740348/revised_safeguarding.pdf

NGOs focused on sexual exploitation, abuse and sexual harassment in the aid sector.³ Eight international NGOs published their own “safeguarding promises”.⁴

There has been a significant increase in the efforts made by international development organisations to ensure that there is no harm done within their organisations or to the people they work with. A fundamental principle that has emerged is that the response to breaches of safeguarding should centre on what is best of the survivor.

This Policy builds upon previous iterations of DAM UK’s safeguarding approach and draws upon, and gratefully acknowledges, the research and recent policy development undertaken by Caplor Horizons.

What is Safeguarding?

Safeguarding is an organisation’s responsibility to avoid harm to its trustees, staff, volunteers, beneficiaries and any other individual with whom it works. More fully, safeguarding is the responsibility that an organisation has to ensure that:

- its employees and volunteers, trustees, partners, operations and programmes do no harm to anyone, taking especial care over children, young people and vulnerable adults;
- it does not expose them to the risk of discrimination, neglect, harm and abuse;
- any concerns the organisation has about the safety of vulnerable people within the communities in which it works are dealt with immediately and reported to the appropriate authorities;
- it protects its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

As the #MeToo campaign shows, safeguarding is not just about children, young people and vulnerable adults: it is about everyone.

The definitions in Appendix 4 detail various forms of discrimination, psychological pressure, sexual abuse and violence.

Why Safeguarding is Important for DAM UK

DAM UK is an organisation that prioritises the wellbeing of our trustees, staff, consultants and volunteers and other stakeholders. Protecting people from harm is central to achieving our vision of ‘a Bangladesh that is an inclusive and sustainable society where women, men and children alike of all backgrounds are able to thrive and live their lives with dignity and respect’.

Therefore, having a robust approach to safeguarding is central to our way of working.

³ https://www.bond.org.uk/sites/default/files/resource-documents/bond_safeguarding_commitments_online.pdf

⁴ <https://www.savethechildren.org.uk/content/dam/gb/reports/policy/181018-our-safeguarding-promises.pdf>

Safeguarding means protecting people in our organisation or people we come into contact with from inappropriate behaviour as well as from abuse and harm. It is the responsibility of everyone.

DAM UK takes a zero-tolerance approach to breaches of this safeguarding policy.

Scope of Policy

This Safeguarding Policy applies to all trustees, staff, consultants and volunteers wherever they are working. It complements other policies and procedures which, in their entirety are known as the Code of Conduct of DAM UK. These policies and procedures include

- Equal Opportunities Policy;
- Privacy Policy;
- Whistle-blowing Policy;
- Governance Guide.

Key Aspects of Safeguarding

This section describes the principles that underlie DAM UK's approach to safeguarding. The following key aspects of safeguarding are discussed in turn:

- Organisational Culture;
- Communications and Engagement;
- Standards, Policies and Procedures;
- References Policy;
- Recruitment and Induction;
- DBS Checks;
- Training;
- Reporting;
- Work with Partners.

1. Organisational Culture

Culture plays a significant role in ensuring effective safeguarding processes or, conversely, in tolerating poor behaviour. For DAM UK, a culture of openness, transparency, distributed power, humility, respect and trust is essential for high quality safeguarding.

In particular, we should recognise our position of perceived power when acting as a donor or external advisor with teams, and the potential impact this will have on the safety of those involved.

2. Communications and Engagement

Clear communication of safeguarding expectations and standards supports a shared culture that prioritises safeguarding. In addition, having safeguarding as part of regular communications within DAM UK ensures a suitable focus and consciousness of safeguarding. The language and understanding of wellbeing, unconscious bias and power

and influence are central to how DAM UK operates, supporting engagement with safeguarding.

3. Standards, Policies and Procedures

A safeguarding culture is strengthened by having clearly articulated and understood standards, policies and procedures that are shared with everyone involved in DAM UK.

The following principles are intended to ensure that any action on a breach of safeguarding is handled appropriately and effectively:

- Any breach of safeguarding should be reported and recorded in writing;
- All sensitive and personal data should be kept confidential (including the names of anyone who makes a report of abuse), and should be shared only with those whose work requires the information;
- A member of staff or a trustee should be identified to lead the case;
- See guidance below on reporting.

4. References Policy

DAM UK's policy on giving references is as follows:

- References can only be given by the Chair or Secretary of the Council of Management, using a DAM UK e-mail address or letter-headed paper;
- References confirm dates and posts held and include a summary of performance;
- Any substantiated safeguarding concerns are noted;
- Problematic references are referred to the Council of Management followed by a recording of decisions and their rationale.

5. Recruitment and Induction

Staff: Job descriptions will highlight the commitment of the organisation to safeguarding, an assessment of the roles safeguarding risk and the role's responsibilities to safeguarding. The staff recruitment process will seek to build a comprehensive understanding on both sides through interviews, introductory periods and induction. At least two references will be requested for all staff appointments.

Consultants: Recruitment and induction of consultants will follow the same process as for staff.

Trustees: Recruitment and induction of Trustees will follow the same process as for staff.

6. DBS Checks

If an opportunity includes work that involves close and unsupervised contact with vulnerable adults and children – known as Regulated Activity – then it is necessary to check whether the individual is included in either of the two Disclosure and Barring Service (DBS) “barred lists” of individuals who are unsuitable to work with children or vulnerable adults. This is a legal responsibility for DAM UK in the case of work in the UK and it is a criminal offence to recruit someone for work from which they are barred. Likewise, it is a criminal offence for someone to seek or carry out UK work in activities from which they are barred.

For some, a DBS check can feel intrusive and an unnecessary invasion of their privacy. Careful consideration should be given as to whether it is necessary to obtain a disclosure in any case not involving a Regulated Activity or whether other measures offer sufficient safeguarding.

Regulated Activities that relate to the work of DAM UK are as follows:

- Providing unsupervised training, coaching or mentoring to children and young people
- Providing unsupervised training, coaching or mentoring to vulnerable adults
- The day-to-day management or supervision on a regular basis of any person carrying out the activities mentioned above.

DAM UK is committed to ensuring that when a role or project involves the likelihood of such Regulated Activities, including outside the UK, the DAM UK trustees, staff, consultants and volunteers involved will be requested to have an enhanced DBS check. DAM UK will cover the cost and make sure there is minimum bureaucracy.

7. Training

DAM UK will ensure that all trustees, staff, consultants and volunteers will receive safeguarding training as part of their induction. All trustees, staff, consultants and volunteers will additionally receive refresher safeguarding training annually.

DAM UK will also continue to seek out training opportunities that enable trustees, staff, consultants and volunteers to study safeguarding in more detail and learn from the practices and experiences of others.

8. Reporting

Where there is an incident the first priority is to support the survivor. There should be careful consideration of the risks for the survivor before reporting to external authorities. Identification of the survivor could lead to additional harm such as difficulty finding work or loss of marriage prospects. Considerations should be recorded.

Serious incidents in the UK should be reported to the police, local authorities (for cases involving children and vulnerable adults) and the Charity Commission.

Guidelines for DAM UK's annual reports are as follows:

- Aim for transparency about incidents and problems faced without naming people;
- Report trends in incidents;
- Describe steps taken following incidents, lessons learned and changes made.

The process for the reporting of Safeguarding issues is detailed in Appendix 1 below. DAM UK has a very careful process for dealing with the raising of any safeguarding concerns. It is essential that this process is scrupulously followed to protect the possible survivors and to ensure that the facts are not accidentally or deliberately obscured.

9. Work with Partners

Safeguarding in relation to the staff and beneficiaries of our partner organisation, Dhaka Ahsania Mission in Bangladesh, involves potentially difficult judgements. This Safeguarding Policy is shaped by the recognition that both DAM UK and our partner have full control of and responsibility for our respective operations and undertakings. However, the organisational values of DAM UK require us to ensure that safeguarding is a primary concern for our partner organisation in the work that we support.

DAM UK will consider the following guidelines when working with our partner organisation:

- Analyse potential risks for any work that it is proposed that our partner is to undertake;
- Ensure our partner has appropriate policies and procedures for safeguarding, safety, security, whistleblowing and complaints that are public, easy to use and updated as lessons are learned;
- When carrying out due diligence, check that our partner has appropriate controls and procedures in place, including adequate safeguarding measures;
- Include safeguarding measures in the partner agreement;
- Ensure that DAM UK is always notified if our partner has a safeguarding incident - and vice versa;
- Help our partner, if required, by offering DAM UK's policies and learning materials.

Responsibilities of Staff, Trustees and Advisors

All trustees, staff, consultants and volunteers are committed to following this Policy and maintaining an environment that prevents exploitation and abuse and encourages reporting of breaches of this Policy using appropriate procedures.

All trustees, staff, consultants and volunteers are responsible for the following:

- Promoting best practice safeguarding approaches and supporting their development with our partner organisation;
- Studying and complying with this Safeguarding Policy and the DAM UK Code of Conduct;
- Striving to develop relationships that are based on equity, trust, respect and honesty;
- Placing the safety and welfare of children and vulnerable people above all other considerations;
- In a one-to-one situation with a child or young person, where privacy and confidentiality are important, trying to make sure that another adult knows what is happening and why. If possible, ensuring another adult is in sight and that the child or young person knows another adult is around;
- Reporting any concerns they may have about the welfare of a child or vulnerable person;
- Reporting any concerns they may have about the behaviour of a DAM UK representative in relation to safeguarding.

Reporting should be to the designated Safeguarding Officer (Dave Sternberg, Chair of the Council of Management: dave.sternberg@yahoo.co.uk) using the report form set out in Appendix 1 below. If the concern relates to the Chair of the Council of Management, then the complaint should be made to the second designated Safeguarding Officer (Matthew Lake, Country Representative: mlake@damuk.org).

The procedure followed by the Safeguarding Officer on receiving a report is set out in Appendix 2 (see below). It is guided by the processes detailed in DAM UK's Whistle-blowing Policy for how to act following an allegation or concern.

All trustees, staff, consultants and volunteers should not do the following:

- Sexually harass, assault or abuse another person;
- Physically harass, assault or abuse another person;
- Emotionally abuse another person, such as by engaging in behaviour intended to shame, humiliate, belittle or degrade;
- Condone or participate in behaviour which is abusive, discriminatory, illegal or unsafe;
- Tolerate sexual harassment or abuse in any working environment;
- Develop, encourage or fail to take action on relationships with children or vulnerable people that could in any way be deemed sexual, exploitative or abusive;
- Act in ways that are violent, inappropriate or sexually provocative;
- Agree with a child to keep a secret which has implications for their safety or the safety of others.

All trustees, staff, consultants and volunteers have an obligation to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation of anyone or which suggest this Policy may have been breached in any other way. In particular, it is important to report clearly on the facts of any concerns, avoiding speculation or interpretation. It is not the responsibility of trustees, staff, consultants and volunteers to decide whether or not abuse has taken place, but all concerns should be reported accurately to the Safeguarding Officer.

Data Protection, Publications and Social Media

DAM UK is committed to ensuring that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialised child welfare or law enforcement agency in relation to a safeguarding incident. (For more detailed guidance, please refer to the Privacy Policy.)

Specifically relating to the protection of children, young people and vulnerable adults in publications and on social media, we will follow the following guidelines:

- Only using names and images of children, young people or vulnerable adults which are respectful and not exposing them to further vulnerability;
- Reproducing images and using the names of children only when we have the permission of their parents / guardians;

- Reproducing images and using the names of young people and vulnerable adults only where we have their permission or that of their parents/guardians, whichever is the most suitable;
- Making clear to vulnerable people and their families, where relevant, that agreement to providing information or images is not a condition of involvement in DAM UK activities and programmes;
- Not distributing any information or violent or sexual images that may be harmful to vulnerable people.

Further helpful guidance is given in the Dóchas Code of Conduct on Images and Messages.⁵

Responsibilities of DAM UK'S Country Representative

In addition to the general responsibilities of all trustees, staff, consultants and volunteers listed above, DAM UK's Country Representative has further responsibilities as follows:

- Ensuring staff, trustees and volunteers are aware of the Policy and are supported to implement it;
- Supporting a management culture that encourages a focus on safeguarding;
- Raising safeguarding when working with our partner organisation and encouraging good practices;
- Acting immediately if they become aware of any safeguarding concerns, and supporting staff, trustees or volunteers who complain or raise concerns;
- Handling and recording reports or concerns appropriately and in accordance with the principles that underpin this Policy;
- Ensuring referrals to the relevant authorities happen without delay;
- Discussing risks to safeguarding as a priority at staff meetings;
- Ensuring all staff attend safeguarding workshops or training;
- Developing and offering training to all staff, trustees and volunteers involved in direct delivery on power, unconscious bias, wellbeing and safeguarding;
- Ensuring that time is allocated to reflecting and learning from programme experiences;
- Ensuring that all staff and trustees that visit the field work of our partner in Bangladesh have a DBS check work relating to regular, unsupervised contact with vulnerable people;
- Including safeguarding in annual reviews;
- Ensuring this policy is reviewed at least once a year and is available to the public.

Responsibilities of Trustees

The Council of Management holds ultimate accountability for this Policy.

In addition to the general responsibilities of all trustees, staff, consultants and volunteers listed above, trustees have further responsibilities as follows:

⁵ <https://dochas.ie/images-and-messages>

- Trustees should be aware of their influence on the culture of DAM UK, expressed in ways such as how they spend their time at Council of Management meetings, what they measure, transparency, how seriously they treat safeguarding issues and how they behave towards each other and staff;
- Any risks to safeguarding should be discussed as a priority at Council of Management meetings. Safeguarding should be included in the risk register;
- Trustees should consider crisis response, being clear about who would do what in a crisis;
- Organisational policies should reflect the operational realities of how and where we work;
- If there is an issue about values, it needs to come to the Board – and the decision must then be rooted in DAM UK's values;
- Trustees should be aware of what other NGOs, Bond and the Charity Commission are doing about safeguarding;
- Trustees involved in direct delivery are encouraged to attend training on power, unconscious bias, wellbeing and safeguarding.

Policy to be reviewed by: November 2021

Appendix 1

Reporting of a safeguarding concern or incident should be to the Safeguarding Officer, even if the concerns relate to our partner organisation.

Set out below is a report form to be completed by the person who has a safeguarding issue or concern to raise.

As ever, the first priority is to support the survivor. The procedure to be followed by the Safeguarding Officer on receiving the report is set out in Appendix 2 (see below). It is guided by the processes detailed in DAM UK's Whistle-blowing Policy for how to act following an allegation or concern.

Reporting a safeguarding concern or incident

To be completed and sent as soon as possible to the designated Safeguarding Officer (Dave Sternberg, Chair of the Council of Management: dave_sternberg@yahoo.co.uk) using the report form set out in Appendix 1 below. If the concern relates to the Chair of the Council of Management, then the complaint should be made to the second designated Safeguarding Officer (Matthew Lake, Country Representative: mlake@damuk.org).

PART 1:

Name of child/person where there is concern	Date of Birth (if person under the age of 18)
Date:	Time (of writing this record):
Name of person who is reporting a concern: 	
Print name	Signature
Job Title or role:	
Note the reason(s) for recording the incident or concern.	

Record the following factually: Who? What is the concern (If recording a verbal disclosure by a child, use their words)? Where? When (date & time of incident)? Any witnesses?

Professional opinion where relevant (how and why might this have happened?)

Note actions, including names of anyone to whom your information was passed.

Any other relevant information (Factual)

Check to make sure your report is clear now – and will also be clear to someone else reading it next year

PLEASE PASS THIS FORM TO THE SAFEGUARDING OFFICER

Appendix 2

PART 2: (for use by the Safeguarding Officer)

Action and response to a reported safeguarding concern or incident

Time & date information received and from whom	
Create an Incident report with a reference number to link the incident report form and this response	Incident reference number you have created:
Ensure there is a written report of the incident and the actions you have taken that is stored securely, maintaining confidentiality	
Detail any advice or further information sought by Chair (date, time, name, role, organisation & advice given)	
<p>Summarise action taken (e.g. referral to police, Charity Commission, grant funder etc) and) If decision not to refer, justify reason.</p> <p>Detail action taken or recommended for disciplining or exclusion of people.</p> <p>Note time, date, names, who information shared with and when etc.</p>	

<p>Summarise clearly the action taken to ensure the immediate safety of the people/children at risk</p> <p>Note date, time and who involved in taking the actions.</p>	
<p>Parents/guardians informed?</p> <p>Yes/ no</p> <p>and reasons</p>	
<p>Outcomes</p> <p>Record names of individuals/agencies who have given you information regarding outcome of any referral (if made)</p>	
<p>Note where can additional information regarding child/ incident be found? (e.g. pupil file, serious incident book)</p>	
<p>Signed</p>	
<p>Printed Name</p>	
<p>Date</p>	

Appendix 3

Sources on Safeguarding

For more information on safeguarding and on the information used in this document please see:

<https://knowhownonprofit.org/organisation/operations/safeguarding>

<https://www.bond.org.uk/ngo-support/safeguarding-guidance-and-resources>

<https://keepingchildrensafe.org.uk/how-we-keep-children-safe/capacity-building/resources/childsafeguarding-standards-and-how-implement>

<http://www.charitycommissionni.org.uk/news/essential-safeguarding-good-practice-seminar-resources/>

<https://blogs.ncvo.org.uk/2018/03/06/safeguarding-do-you-need-to-update-what-youre-doing/>

<https://knowhownonprofit.org/yourteam/volunteers/keeping/ncvosafeguardingforvolunteeringorgs.pdf>

https://keepingchildrensafe.org.uk/sites/default/files/resource-uploads/KCS_STANDARDS_2014.pdf

<https://www.vsointernational.org/news/blog/our-commitment-to-the-worlds-most-vulnerable>

<https://www.ukyouth.org/what-we-do/#training>

<http://www.volunteernow.co.uk/fs/doc/publications/safeguarding-children-and-adults-policy-standardssept-2016.pdf>

<http://www.charitycommissionni.org.uk/media/151331/20180531-safeguarding-seminar-notes.pdf>

Appendix 4

Definitions Relating to Safeguarding

This Policy acknowledges the following definitions (as described in the VSO Safeguarding and Child Protection Policy).

Abuse - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Discriminatory abuse – abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect - the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Sexual abuse - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for

abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Child – DAM UK regards a child as anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Vulnerable person/people – for the purposes of this Policy this is an umbrella term which covers children, young people and vulnerable adults.

Vulnerable adult - a person 18 years and above who, by reason of disability, age, gender, social and economic status, illness or the context they are in, may be unable to take care of or to protect her or himself against abuse, harm or exploitation.

Youth or young people - individuals aged 15 to 25 – DAM UK recognises that this group spans the categories of 'children and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.