

POLICY

Safeguarding

Change begins with Education

Contents

1. INTRODUCTION AND PREAMBLE.....	1
2. PURPOSE OF THE POLICY.....	1
3. WHAT IS SAFEGUARDING?	1
4. SCOPE OF THIS POLICY.....	2
5. GUIDING PRINCIPLES.....	2
6. DEFINITIONS.....	3
7. POLICY STATEMENT.....	4
8. PREVENTION.....	4
<i>SeeBeyondBorders’ responsibilities.....</i>	<i>4</i>
<i>Staff responsibilities.....</i>	<i>5</i>
9. ENABLING REPORTS.....	5
<i>How to report a safeguarding concern</i>	<i>5</i>
10. RESPONSE.....	6
11. CONFIDENTIALITY.....	6
Associated Policies and Procedures	6
12. POLICY MANAGEMENT.....	6

SAFEGUARDING POLICY

1. INTRODUCTION AND PREAMBLE

SeeBeyondBorders is a not-for-profit organisation that is registered as a charity in Australia and the UK, and operates as a registered international non-government organisation in Cambodia. Our vision is to provide Cambodian children with access to quality teaching and learning at school.

SeeBeyondBorders' staff, volunteers and program participants work in schools with teachers, children and young people, therefore it is imperative that the organisation has a clearly defined Safeguarding Policy and effective procedures that govern all three SeeBeyondBorders entities.

Safeguarding is an extension of Child Protection, for example with regards to the design and delivery of projects and activities. It goes without saying that SeeBeyondBorders does not develop programs that risk harming children or vulnerable people, but there may be a risk that in a given set of circumstances, where a project design is enacted in unsuitable circumstances, there may be the risk of harm. Therefore, staff need to be in a state of readiness to foresee the potential for harm as well as address it should it occur. These risks will be managed against each activity and against a list of potential hazards that will continue to evolve as experiences of delivering activities develops.

2. PURPOSE OF THE POLICY

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with SeeBeyondBorders. This includes harm arising from:

- The conduct of SeeBeyondBorders Personnel as defined in section 4
- The design and implementation of SeeBeyondBorders' programs and activities

The policy lays out the commitments made by SeeBeyondBorders and Personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under SeeBeyondBorders' Discrimination, Harassment and Bullying Policy.
- Safeguarding concerns in the wider community not perpetrated by SeeBeyondBorders Personnel – this is dealt with under SeeBeyondBorders Child and Vulnerable People Protection Policy.

3. WHAT IS SAFEGUARDING?

SeeBeyondBorders recognise safeguarding to mean protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

We understand it to mean protecting people, including children and at-risk adults from harm that arises from coming into contact with our personnel.

Further definitions relating to safeguarding are provided in the glossary below.

4. SCOPE OF THIS POLICY

This policy applies to all SeeBeyondBorders Personnel, defined as:

- board members and trustees
- current staff and volunteers
- external consultants and contractors (paid or voluntary)
- contracted staff or personnel of contracted organisation and services
- project team participants

and any other person working for or on behalf of SeeBeyondBorders.

This policy also applies to other individuals and third parties who through their association with SeeBeyondBorders may visit our project activities (i.e. donors, Australian and UK Partner Organisations, service providers) although the management process for these groups may differ in certain aspects given their involvement.

5. GUIDING PRINCIPLES

The SeeBeyondBorders Safeguarding Policy has five guiding principles:

- **Zero tolerance of abuse and exploitation:**
Abuse and anything else that causes harm to children, young people and vulnerable beneficiaries is not tolerated by SeeBeyondBorders, nor is possession of or access to child pornography.
- **Recognition of children's interests:**
SeeBeyondBorders is committed to upholding the rights of children and recognises that some children, such as children with disabilities and children living in areas impacted by disasters (natural or conflict based), are particularly vulnerable.
- **Shared responsibility for child and vulnerable beneficiary protection:**
To effectively manage risks to children and vulnerable beneficiaries, SeeBeyondBorders requires the active support and cooperation of all its Personnel. SeeBeyondBorders Personnel must comply with this policy and will be held accountable for complying with it.
- **Use of a risk management approach:**
Careful management can reduce the incidence of child and vulnerable beneficiary abuse associated with aid activities. This policy introduces strategies for minimising a range of recognised risks to children and vulnerable beneficiaries.
- **Duty of Care:**
SeeBeyondBorders recognises its Duty of Care responsibilities and takes all reasonable steps to safeguard the children and vulnerable beneficiaries in its programs.

6. DEFINITIONS

Beneficiary of Assistance

Someone who directly receives goods or services from SeeBeyondBorders' program. Note that misuse of power can also apply to the wider community that SeeBeyondBorders serves, and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding

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

In our sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff, volunteers, visitors or programs. One donor definition is as follows:

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

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

Safeguarding applies consistently and without exception across our programs, partners, staff, volunteers and visitors. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

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

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

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

At risk adult

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

7. POLICY STATEMENT

SeeBeyondBorders believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. SeeBeyondBorders will not tolerate abuse and exploitation by staff, volunteers or visitors.

This policy will address the following areas of safeguarding [as appropriate]: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

SeeBeyondBorders commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

8. PREVENTION***SeeBeyondBorders' responsibilities***

SeeBeyondBorders will:

- Ensure all staff, volunteers and visitors have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programs and activities in a way that protects people from any risk of harm that may arise from their coming into contact with SeeBeyondBorders. This includes the way in which information about individuals in our programs is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and volunteers
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process.

Staff responsibilitiesChild safeguarding

SeeBeyondBorders' staff, volunteers and visitors must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking.

Adult safeguarding

SeeBeyondBorders' staff, volunteers and visitors must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect.

Protection from sexual exploitation and abuse

SeeBeyondBorders' staff, volunteers and visitors must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, SeeBeyondBorders' staff, volunteers and visitors are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by a SeeBeyondBorders' staff member, volunteer or visitor to the appropriate staff member as per the reporting procedures.

9. ENABLING REPORTS

SeeBeyondBorders will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, volunteers, visitors and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by SeeBeyondBorders' Whistleblowing Policy.

SeeBeyondBorders will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their Safeguarding Focal Point or line manager. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be the HR manager or another member of the leadership team or manager in another country office.

10. RESPONSE

SeeBeyondBorders will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns in Associated Policies).

SeeBeyondBorders will apply appropriate disciplinary measures to staff found in breach of policy.

SeeBeyondBorders will offer support to survivors of harm caused by staff, volunteers or visitors, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

11. CONFIDENTIALITY

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

Associated Policies and Procedures

Anti-bullying and Harassment policy

Child and Vulnerable Beneficiary Protection policy

Code of Conduct

Complaints Policy

Disciplinary Procedures

Grievance Procedures

Procedures for reporting and response to safeguarding concerns

Procedures for safeguarding in staff recruitment

Risk Management Policy

Risk Assessment Matrix

Whistleblowing policy

Other policies as appropriate

12. POLICY MANAGEMENT

This policy takes effect from the date of approval by the Board as noted below.

Amendments and or developments will be recommended to the Board from time to time as deemed appropriate by the CEO together with the General Manager and the Advisory Committee. Formal reviews will take place before the expiry of three years from the anniversary date of approval by the Board. Any changes to the Child Protection policy will result in a review of all relevant policies and

SAFEGUARDING POLICY

procedure guidelines. Recommendations for change will require Board consideration and if necessary Board approval.

Approved by the Board (Australia)

Date: _____ 2/8/2015

By (Board representative): _____

Approved by the Trustees (UK)

Date _____

By (Representative of Trustees) _____

Formal review required on or before: _____ (Date)

Version Number	Review Date	Reviewed By	Approved By	Effective Date	Supersedes
Version 1		Rebecca Evans	SBB Board		

Associated Policies and Procedures

- Discrimination, Harassment and Bullying policy
- Child and Vulnerable People Protection policy
- Code of Conduct
- Complaints and Feedback Handling policy
- Disciplinary Procedures
- Grievance Procedures
- Procedures for reporting and response to safeguarding concerns
- Procedures for safeguarding in staff recruitment
- Risk Management policy and Risk Assessment Matrix
- Whistleblowing policy
- Other policies as appropriates

12. POLICY MANAGEMENT

This policy takes effect from the date of approval by the Board as noted below.

Amendments and or developments will be recommended to the Board from time to time as deemed appropriate by the CEO together with the leadership team. Formal reviews will take place before the expiry of three years from the anniversary date of approval by the Board and Trustees. Any changes to the Safeguarding policy will result in a review of all relevant policies and procedure guidelines. Recommendations for change will require Board and Trustee consideration and if necessary approval.

Approved by the Board (Australia)

Date: _____

By (Board representative): _____

Approved by the Trustees (UK)

Date 11th October 2018

By (Representative of Trustees) Aude Studd

Formal review required on or before: _____ **(Date)**

Version Number	Review Date	Reviewed By	Approved By	Effective Date	Supersedes
Version 1		Rebecca Evans	SBB Board	1/09/2018	N/A