

Practical Action

SAFEGUARDING POLICY

Version V3
Date September 2020
Scope All employees, trustees, consultants, volunteers and others acting on behalf of Practical Action or its subsidiaries

Review Date September 2021

Approval required from	Name	Date approved
Policy Owner:	Global Head of People & Culture	September 2020
Responsible Director:	Finance & Services Director	September 2020
Board approval	September 2020	

Queries:	Contact the Policy Owner
Exceptions:	Contact the Responsible Director

Big change starts small

POLICY STATEMENT

- Practical Action will create a strong and effective enabling environment and a safeguarding culture to promote the rights and protection of beneficiaries, community members, staff, volunteers or anyone else impacted by our work.
- Practical Action firmly believes that no person should experience harm, particularly sexual exploitation or abuse, and Practical Action takes seriously its responsibility to safeguard those who come in contact with our work.
- Practical Action will investigate and, where appropriate, respond to any suspected breach of this Policy, including through disciplinary action.
- Safeguarding is an organisational and an individual responsibility. This policy applies to all employees and trustees of Practical Action and its subsidiaries, wherever contracted, and to consultants, volunteers and others acting on behalf of Practical Action, including partners.

SCOPE

This policy covers harm arising from the conduct of staff or any others acting on behalf of Practical Action as well as through the design and implementation of Practical Action's programme activities.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Practical Action's Diversity and Dignity at Work Policy
- Safeguarding concerns in the wider community not perpetrated by Practical Action or associated personnel

CORE PRINCIPLES

Practical Action upholds the following core principles:

- We have zero tolerance for sexual exploitation and abuse; these acts constitute gross misconduct and represent grounds for disciplinary action up to and including termination of employment.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the local age of consent or local/national laws of the relevant country; ignorance or mistaken belief in the age of the 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 is prohibited. This includes the exchange of assistance that is due to beneficiaries.
- Sexual relationships between beneficiaries and anyone acting on behalf of Practical Action that involve improper use of influence, power, rank or position are prohibited. Such relationships violate people's rights and wellbeing, undermine the credibility and integrity of Practical Action's work and are incompatible with the values we're committed to uphold as an organisation.
- Anyone acting on behalf of Practical Action will not engage in any commercially exploitative activities with children including child labour or trafficking

- When a Practical Action employee, Trustee, volunteer, consultant or partner develops concerns or suspicions regarding sexual exploitation or abuse by a Practical Action employee or anyone acting on our behalf they **must report their concerns** via the established reporting procedures.
- Practical Action employees take action to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of this Policy. Practical Action Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.
- All employees, trustees, volunteers, consultants, partners and others acting on behalf of Practical Action are expected to behave in ways that safeguard others from sexual exploitation and abuse. Specifically this includes, but is not limited to, avoiding all inappropriate physical contact with children or at risk adults, not making suggestive remarks or actions, remarks that embarrass, humiliate or degrade and being accompanied by a second work colleague whenever in the close presence of at risk adults and/or children and to never deliberately place themselves or others in a compromising situation.
- Practical Action is committed to pursuing a survivor-centered approach and seeks to empower survivors and promote their recovery by prioritising their rights, needs and wishes.

1. SAFEGUARDING COMMITMENTS AND OBLIGATIONS

Across our entities, Practical Action's managers will ensure that we will:

- 1.1. Standards: incorporate this policy in induction for employees, trustees, volunteers, consultants, partners and others acting on behalf of Practical Action. Employees will be required to sign a declaration stating that they have received and understood it via net consent or appendix 1. Anyone acting on our behalf is required to sign up to our code of conduct which sets out minimum standards of professional behaviour.
- 1.2. Awareness and training: Create and maintain mechanisms to systematically make Practical Action employees, trustees, volunteers, consultants, partners, others acting on our behalf and the communities we serve aware of measures to prevent and respond to harm, sexual exploitation and abuse. Regular training will be provided to employees to develop their understanding of appropriate behaviours and their responsibilities in relation to safeguarding.
- 1.3. Focal Point: Appoint, train and support a Safeguarding Focal Point to co-ordinate and implement the policy and handle reports.
- 1.4. Reporting mechanisms: Establish and ensure that mechanisms for reporting harm, sexual exploitation and abuse are accessible, particularly to beneficiaries of Practical Action programmes, and that the Safeguarding Focal Point, responsible for receiving complaints, understands how to undertake their duties.
- 1.5. Recruitment: Aim to prevent people who are deemed unsuitable to work with children and at risk adults from gaining access to them through their work. In compliance with applicable laws and to the best of our abilities, we will prevent perpetrators of sexual exploitation and abuse from being employed at or engaged by Practical Action. We will do this by referencing our commitment to Safeguarding in job adverts and, wherever possible, by undertaking appropriate background and criminal reference checks. Where formal background checks are not practical, appendix 2 must be completed by the individual and retained on file. Two employment references covering three years must be requested from the person responsible for HR for a recent employer. All reference templates must ask for information about

safeguarding issues. When relevant to the job, interview questions will include specific questions about the candidate's awareness of safeguarding.

- 1.6. Community awareness: Ensure measures are taken so that beneficiaries are aware of their right to, and how to, report their complaints and concerns.
- 1.7. Programme work: Design and undertake all programmes and activities in a way that protects people from risk of harm. This includes the way in which information about individuals in our programmes is gathered and communicated
- 1.8. Partnerships: Ensure that when engaging in partnership, sub-grant or sub-recipient agreements, these agreements a) incorporate this Policy as an attachment; b) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to comply with this Policy; and c) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse, to investigate allegations thereof, or to take corrective actions when sexual exploitation or abuse has occurred, shall constitute grounds for Practical Action to terminate such agreements.
- 1.9. Representation: Ensure that all representation of beneficiaries conforms to the guidelines on use of photographs and working with the media and communications materials (see below).
- 1.10. Policy Review: Undertake a review of this Policy at least every year.
- 1.11. There will be one Trustee identified as the safeguarding focal point for the Board.

2. REPORTING

- 2.1. Obligation to report: Should any individual receive any information about, or observe, actual or suspected abuse they must report this immediately via one of the two methods below:
 - To the Safeguarding Focal Point or, if the safeguarding focal point is involved, another senior manager
 - To our dedicated reporting service: details for this service can be found in the 'Global Complaints (Whistleblowing) Policy available on Netconsent.

Practical Action will accept complaints from employees and any other individual including external sources such as members of the public, partners and official bodies.

- 2.2. Reporting procedures: Procedures on how to report sexual exploitation and abuse, appropriate to the local context, and our "Statement of Commitment to Safeguarding" must be clearly displayed to ensure that all individuals and communities are aware of these reporting procedures.
- 2.3. Protection of reporters: Individuals covered by this policy and communities are encouraged to report concerns over sexual exploitation and abuse. To the best of our abilities we will protect persons from retaliation when allegations of sexual exploitation and abuse are made in good faith. This protection may include anonymity.
- 2.4. Malicious reporting: Malicious and intentionally misleading reporting will not be tolerated and may result in disciplinary action.

3. RESPONSE

- 3.1. Responsibility to respond: Under no circumstance will concerns of abuse and inappropriate behaviour be ignored.

- 3.2. Welfare: The immediate physical and psychological safety of the survivor and the person reporting the concern will be of paramount importance and reasonable steps will be taken to maintain their safety.
- 3.3. Investigation: Any reports of actual or suspected exploitation or abuse will be appropriately investigated. This might include the use of appropriate interviewing practices with complainants and witnesses. We may engage professional investigators or secure investigative expertise as appropriate. Any investigation would be conducted in an impartial manner with the aim of establishing the facts and will not begin with preconceived ideas.
- 3.4. Notification: The Chief Executive and the Chair will be kept updated on any allegations that could constitute a serious incident as defined by the UK Charity Commission.
- 3.5. In some circumstances, depending on the nature of the incident, we will notify the police, local authority or other relevant regulator or statutory agency such as the Charity Commission in the UK.
- 3.6. In order to prevent perpetrators of safeguarding or other serious misconduct from continuing to work in our sector, we have a duty to pass on concerns to future employers. We also have a duty of care to provide references that are true, accurate and fair. In light of these obligations, Practical Action may notify future employers of misconduct it is aware of. Please refer to the Global Reference Policy.
- 3.7. Action: Breaches of this policy by employees are likely to constitute gross misconduct and result in suspension and termination of employment, in accordance with relevant disciplinary procedures. In the case of a breach by other representatives, including contractors, this may constitute breach of contract and appropriate action may be taken. As appropriate, those operating on behalf of Practical Action will be referred to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.
- 3.8. Monitoring: Provide high level oversight of reports made and ensure appropriate action has been taken; record all complaints received and how they were dealt with. Regular reports of complaints received are provided to the Organisation Committee of the Board. We will continually improve efforts to prevent and respond to sexual exploitation and abuse.
- 3.9. Risk: We include safeguarding in our risk register and take steps to identify and manage risks.

4. COMMUNICATIONS AND REPRESENTATION

- 4.1. Photographers and story gatherers will, whenever possible, explain to the beneficiary or child and the parent/guardian of the child, who will be taking a photograph and the kind of purposes it might be used for. No photographs will ever be used of children where permission has been refused.
- 4.2. Personal and physical information about beneficiaries that could be used to identify their location within a country should not be used in any form of public communication. First names only or invented personal names should be used. The immediate location where the subject lives should not be used unless their explicit and informed consent has been given.
- 4.3. Individuals or organisations requesting the use of third party resources such as videos or photographs should be required to agree in writing with the agency as to the proper use of such materials.
- 4.4. Wherever possible, feedback should be provided to the subject(s) or their parent/guardian(s) by sending copies of the photos and case studies (if possible translated into an accessible language).

4.5. Information about a beneficiary's life, including photographs of them, will be stored safely and in accordance with the current data protection policy.

GLOSSARY

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.

Child/Children

Children are defined by the UN Convention of the Rights of a Child as being someone under the age of 18 years of age, regardless of the local age of majority/consent.

At risk adult

Those aged 18 or over who are less able to protect themselves from harm, exploitation or abuse. Adults may be at risk due to issues related to gender, age, frailty, mental health, physical capabilities, religion/socially excluded, minority groups, disasters or conflict. Individuals do not need to identify themselves as at risk to be covered by the protections outlined in this policy.

Sexual Exploitation & Abuse

"Sexual exploitation" is 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. "Sexual abuse" is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes non-contact and online sexual exploitation and abuse.

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

Appendix 1: Policy declaration form

Employees who do not sign to accept this policy through net consent, and all other individuals, are required to complete and return this form to your relevant contact at the time of appointment.

- ✓ I have read and understand the Safeguarding policy
- ✓ I agree to apply the Safeguarding policy in its entirety

Full name (print):

Signed:

Date:

Appendix 2: Self-declaration form

In order to comply with the Practical Action Safeguarding policy this form must be completed and signed by all employees at the time of appointment where a background clearance check is not available.

Full name (print):

Address (print):

Date of birth:

Place of birth:

1. Do you have any prosecutions pending or have you ever been charged or convicted of a criminal offence relating to the exploitation or abuse of a child or adult?

YES / NO

If YES, please state the nature and dates (s) of the offence:

Date of offence:

Nature of offence:

2. Have you ever been the subject of disciplinary procedures, or have left, or been asked to leave employment or voluntary activity due to inappropriate behaviour towards any individual?

YES / NO

If YES, please give details including date(s) below:

Name of employer:

Date of incident:

Nature of incident/inappropriate behaviour:

Declaration:

I understand that, if it is found that I have withheld information or included false or misleading information above, I may be removed from my post whether paid or voluntary, without notice. I hereby declare that information provided above is accurate.

Signed:

Date: