



Purpose

Integrity Action's Board of Trustees and staff are committed to providing a safe and secure, non-threatening, non-oppressive environment for all people who come in contact with our work. People for whom we exist have the right to protection and freedom from exploitation or abuse (physical, mental, discriminatory, financial/material, neglect, emotional, or/and sexual). Any such behaviour must be proactively prevented and appropriately addressed. We have a zero-tolerance approach to serious misconduct and will not tolerate that our staff, trustees, consultants, partners or any other associated personnel carry out any form of abuse and exploitation. We are committed to putting the voices, rights, and support of survivors of abuse and exploitation at the heart of our approach.

This policy and all its annexes apply to anyone who comes into contact with Integrity Action; this means: communities where our projects are located, community monitors, staff, trustees, partners, consultants, and all those connected with Integrity Action's activities. All of them have equal rights and protection from abuse and exploitation.

However, we recognise that children and vulnerable adults are at more risk than the general population and that additional effort needs to be made to safeguard their wellbeing. We will make this effort regardless of their age, disability, gender, racial heritage, religious belief, sexual orientation or identity.

It is the intention of this policy to outline a series of principles and ways of working that are equally applicable to the safeguarding of children, vulnerable adults and of all other adults who are connected with Integrity Action's activities, recognising that safeguarding is everybody's responsibility.

Definitions for the purpose of the policy

You can find a comprehensive list of definitions and key concepts in ANNEX 1. It is your responsibility to read and understand all definitions related to this policy. Definitions will also be dealt with during staff/trustees safeguarding training/induction.

Guiding principles

Integrity Action abides by our Pledge to Safeguarding (ANNEX 2). Over and above these commitments, we are guided by the following principles:

1. All people (children and adults) have the right to be safe and free from abuse and exploitation and we do our best to prevent it occurring in the course of our work.
2. We do not tolerate abuse and exploitation. All incidents of alleged poor practice, misconduct and abuse are taken seriously, responded to and reported as appropriate to the national and UK authorities, donors and other relevant regulatory bodies.
3. We proactively work with both children and adults to maximise their ability to keep themselves safe, free from harm and enabled to manage their own decisions in respect of exposure to risk. We ensure that all actions on protecting people are taken in their best interests. We ensure that survivors of abuse are supported and alleged perpetrators are held to account.
4. We only work with partners, consultants and contractors who share our commitment to this policy. We ensure that they are aware of their responsibilities in relation to safeguarding. We only appoint staff and Trustees with shared values and who have been DBS (Disclosure, Barring and Safeguarding) checked.
5. Integrity Action fosters a culture where safeguarding is taken seriously through staff training and commitment to safeguarding procedures. Our programmes are designed and delivered in a way which is safe and based on the 'do no harm' principle.



Application

This policy applies to Integrity Action's staff and trustees. It also applies to those engaged, commissioned or contracted to work with or on behalf of Integrity Action in any capacity, unless their safeguarding policy is more stringent. Integrity Action expects all partners to have appropriate safeguarding policies and procedures and is committed to work with partners to adopt practices and policies in case they do not have them (ANNEX 16). Integrity Action requires all staff, trustees, partners, Certified Trainers, and community monitors to read, understand and sign a Code of Conduct (ANNEX 3).

Ownership and responsibilities

CEO

The Safeguarding Policy is owned by the CEO. It will be periodically reviewed and updated by the HR team to ensure compliance with relevant UK legislation, international norms and standards, best sector practices and that it responds to the needs of all people who take part in Integrity Action's programmes.

The CEO has also been designated as Safeguarding Focal Point. Their role and responsibilities in the capacity of designated Safeguarding Focal Point are outlined in ANNEX 11.

Trustees

In line with the Charity Commission's guidance on safeguarding, the responsibility for reporting serious incidents rests with the Trustees. All Trustees hold ultimate responsibility for ensuring Integrity Action makes a report, and does so in a timely manner. The Trustees' role and responsibilities on safeguarding are outlined in ANNEX 13. A Trustee Ethical Focal Point with safeguarding responsibilities has been designated within the Board. Please read ANNEX 12 for more information on their role.

HR Team

The HR Team has specific responsibilities in relation to Safeguarding. Please refer to ANNEX 14 for more information.

Staff

Each staff member has an individual responsibility to prevent and report abuse, as well as to ensure that safeguarding principles and actions are embedded in their daily responsibilities. Please refer to ANNEX 4 to read about the behaviour that is expected from staff, as well as ANNEX 15, 16, 17, and 18 for the specific responsibilities around safeguarding connected within each position.

Partners

For projects implemented in collaboration with Integrity Action, partners will be requested to send an anonymised list of safeguarding incidents with information on how these were dealt with. We will use this information to ensure that report-handling mechanisms are appropriate, for lesson learning and to ensure that our future projects are safer. In some cases, we can devise joint report handling mechanisms for specific projects. Please read ANNEX 7 for more information. Partners are expected to ensure that community monitors and Certified Trainers have signed the Code of Conduct (ANNEX 3) and that together with community members they are aware of the reporting mechanisms at their disposal as outlined in ANNEX 8.

Consultants, contractors, and other associate personnel

Relevant staff are responsible for communicating this policy to consultants, contractors, and other associated personnel before entering into contractual arrangements with them. Consultants,



contractors, and other associated personnel are expected to abide by Integrity Action's expected behaviour as outlined in Annex 4 and report any safeguarding concerns/incidents by using any of the reporting mechanisms at their disposal as outlined in ANNEX 5 and 6.

Reporting

Actual, potential or suspected concerns/incidents of abuse must be reported as soon as possible. A number of alternative mechanisms have been created to facilitate reporting for staff, Trustees, partners, associated personnel community monitors and community members. Please refer to ANNEX 5, 6, 7 and 8 for more information on how to make a report.

Our Response

If you report a concern/incident, this will be processed by the Safeguarding Focal Point as outlined in ANNEX 9. Serious Incidents will also be reported to the Charity Commission and other institutional bodies as appropriate, as outlined in ANNEX 10.

Protection of Whistleblowers

If you report a concern/incident you will be protected by Integrity Action's whistleblower policy, which means that no retribution will follow as a consequence of your report, even if it turns out to be mistaken, provided that the concern is based on an honest belief and good faith. Malicious allegations will be made a serious disciplinary offence and will be investigated. Please refer to our Whistleblower Policy for more information.

Support

Integrity Action is committed to offer support to all those who have been affected by abuse during our work. Please look at ANNEX 19 for more information.

If an allegation has been made against you, you are entitled to a fair treatment and due process throughout. Please look at ANNEX 20 for more information.

If you would like to discuss any of the above, need support or have concerns please contact the Safeguarding Focal Point, Jasmina Haynes on jasmina.haynes@integrityaction.org.

If you think that your concern cannot be appropriately addressed by the Safeguarding Focal Point, please contact our Trustees Ethical Focal Point, Nilima Gulrajani on ng@nilimagulrajani.com.

List of ANNEXES

- ANNEX 1 Definitions and key concepts
- ANNEX 2 Integrity Action's pledge on safeguarding
- ANNEX 3 Codes of Conduct for staff, trustees, partners, Certified Trainers and monitors
- ANNEX 4 Dos and Don'ts
- ANNEX 5 How to act on a safeguarding incident/concern
- ANNEX 6 How to report a safeguarding concern/incident for IA staff/Trustees/personnel
- ANNEX 7 How to report a safeguarding concern/incident for partners
- ANNEX 8 How to report a safeguarding concern/incident for Community Monitors and community members
- ANNEX 9 How to deal with a safeguarding report (for Safeguarding Focal Points)
- ANNEX 10 Serious Incidents Reports to the Charity Commissions (For the Board of Trustees)
- ANNEX 11 Your Role as Safeguarding Focal Point
- ANNEX 12 Your Role as Trustee Ethical Focal Point
- ANNEX 13 Your Role on safeguarding as Trustee
- ANNEX 14 Safeguarding & HR



Last reviewed: July 2019

- ANNEX 15 Safeguarding & Programme Development
- ANNEX 16 Safeguarding & Integrity Action's Partners
- ANNEX 17 Safeguarding & Communications
- ANNEX 18 Safeguarding & Data Collection
- ANNEX 19 Support to survivors
- ANNEX 20 How to behave if you have been accused of an alleged abuse