

SAFEGUARDING POLICY

1 INTRODUCTION

Shared Interest provides financial services and training to disadvantaged communities throughout the world. It is the responsibility of all of us to prevent the physical, sexual, emotional abuse or neglect of every member of our community and particularly the abuse of those most vulnerable among us, including children, young people and adults at risk. This policy seeks to ensure the welfare and protection of those who access services provided by our organisation. The aim of this policy is to ensure that all staff, volunteers, interns, non-executives, trustees, consultants and partners can work to prevent abuse and know what to do in response to any allegations, reports or suspicions of abuse.

Everyone has the right to be safe from harm and able to live free from fear of abuse, neglect and exploitation. The policy clarifies the organisation's expectations and seeks to enable Shared Interest to:

- Promote good practice and work in a way that can prevent harm, abuse and coercion from occurring.
- Ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported.

2 DEFINITIONS

2.1 **Adults at risk** are those aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or exploitation. The reasons for this may include:

- Their gender
- Old age or frailty
- Mental health problems
- Learning or physical disabilities
- Poverty or disadvantaged circumstances
- Disasters or conflicts

2.2 **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.

2.3 **Abuse** may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act or it may occur when an adult at risk or child is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent to.

Abuse can occur in any relationship and it may result in significant harm to, or exploitation of, the person subjected to it. It may be carried out deliberately or unknowingly. Abuse can come in many forms and includes:

- **Physical abuse** – hitting, slapping, pushing, kicking, injuring, misuse of medication, restraint or inappropriate sanctions
- **Sexual abuse** - rape, sexual assault or sexual acts to which a vulnerable adult or child has not consented, or has been coerced into giving consent through psychological abuse.
- **Psychological abuse** - emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidating, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks.
- **Financial or material abuse** – theft, fraud, exploitation of disadvantaged circumstances, pressure regarding wills, property or inheritance. Manipulation of financial terms or transactions. Withdrawing of financial support or training services. Misuse or misappropriation of property, possessions or benefits.
- **Neglect and acts of omission** – ignoring medical or physical care needs failure to provide access to appropriate health, social care or educational services. Withholding of necessities of life: medication, adequate nutrition, clothing and shelter.
- **Discriminatory abuse** - ageism, racism, sexism, based on disability or other forms of harassment, slurs, or hate-crime.

3 CODE OF BEHAVIOUR

Applying good practice in our everyday working and life situations must be a priority in all that we do.

You must never:

- Hit or otherwise physically assault or physically abuse others.
- Develop physical/sexual relationships with children or adults at risk.
- Develop relationships with children or adults at risk, which could in any way be deemed exploitative or abusive.
- Place yourself or colleagues in a position where you or they could be accused of sexually abusing a child, young person or adult at risk, i.e. holding or hugging a child, young person or adult at risk, or physically touching children, young persons or adults at risk in a way that could be considered abusive in ways described in this document.
- Spend time alone with children or adults at risk. Plan activities so that more than one person is present or, at least, other people are within sight and hearing. Wherever possible ensure that another adult is present to supervise the activity.
- Take children/adults at risk alone in a car when acting on behalf of Shared Interest, even on short journeys.
- Act in ways that may be abusive or may place a child or adult at risk of abuse.
- Use language, make suggestions or offer advice, which is inappropriate, offensive or abusive.

- Offer benefits such as food, favours, clothes, jobs or money in exchange for sexual favours.
- Show favouritism to any individual for sexual favours in return.
- Act in ways intended to shame, humiliate, belittle or degrade children or adults at risk, or otherwise perpetrate any form of emotional abuse.

You must always:

- Treat everyone with dignity and respect, recognising their right to personal privacy.
- Be aware of situations that may present risks and manage these.
- Provide a good example of acceptable behaviour, in a way that is in line and true to the Shared Interest mission, and core values in and out of working hours.
- Be aware of any “power” relationships that exist.
- Plan and organise events so that risks are minimised
- Avoid being drawn into inappropriate attention seeking behaviour, such as tantrums or crushes.
- If travelling, and staying overnight, ensure that adults and children have separate sleeping accommodation.
- Remember that someone else may misinterpret your actions, no matter how well intentioned.
- Adults should avoid being placed in a compromising or vulnerable position. The adult is always considered responsible even if a child behaves seductively.
- Try to ensure that your actions cannot be misunderstood or cause offence and are acceptable within a relationship of trust.
- Show understanding when dealing with sensitive issues including cultural differences and human diversity.
- Remember that we all have a responsibility to challenge unacceptable behaviour and report all allegations/suspicions of abuse.
- Be responsive to reports of abuse and investigate appropriately.
- In order to reduce the likelihood of abuse taking place, staff, volunteers, non executives and trustees and interns should adhere to the Safeguarding Code of Conduct. The Code of Conduct includes guidance on appropriate and expected standards of behaviour towards vulnerable individuals.

Communications

Shared Interest has a commitment to undertake all communications with a child, young person or adult at risk in a safe manner by:

- Taking particular care to ensure the privacy of the child, young person and/or adult at risk.
- Never taking photographs of a child, young person or adult at risk while they are in changing or bathing areas.
- Obtaining consent from the child, young person or adult at risk and/or their parent/guardian to take and publish photographs.
- Ensuring that all photographers and filmmakers adhere to the above and follow the agreed brief, seeking written consent from all individuals involved and their parent/guardian.

Social media

There is also the potential for misuse of social media. The risks associated with user interactive services include cyberbullying, grooming and potential abuse by online

predators, identity theft and exposure to inappropriate content including self-harm, racism, hate and adult pornography. Shared Interest will ensure risks associated with social media are explored and managed through the risk assessment and that staff, volunteers, non executives, trustees and interns follow the organisations Social Media Policy.

4. DESIGNATED NAMED PERSON FOR SAFEGUARDING

4.1 Shared Interest has an appointed individual who is responsible for dealing with any Safeguarding concerns. In their absence, a deputy will be available for staff to consult with.

MD is the Designated Named Person for Safeguarding

Head of HR is the Deputy Named Person for Safeguarding.

Email: safeguarding@shared-interest.com

4.2 These staff will take on responsibility for:

- Ensuring the Policy is being put into practice
- Being the first point of contact for safeguarding issues.
- Keeping a record of any concerns expressed about safeguarding issues.
- Where necessary, taking further steps, such as referring concerns to other agencies.
- Bringing any child or adult at risk concerns to the notice of the Board, where appropriate.
- Ensuring that paid staff, consultants (including third party), volunteers and Board members are given appropriate training, support and supervision on safeguarding.
- Ensuring that everyone involved in the organisation is aware of the identity of the safeguarding representatives.

4.3 Should either of these named people be unavailable then you should speak to a Senior Manager.

5 WHAT SHOULD YOU DO IF YOU HAVE ANY CONCERNS?

5.1 If you suspect that a child, young person or vulnerable adult is being, has been or is likely to be abused, you must take action. Under no circumstance should concerns of abuse and inappropriate behaviour be ignored. The need to ensure the immediate physical and psychological safety of the vulnerable adult, child or young person should always be of paramount importance. You must report in situations where:

- You see or suspect abuse.
- An allegation of abuse is made to you.
- The person or child tells you of abuse.

5.2 Reports should be made to the Designated Person as soon as possible (within 24 hours) giving as much detail as possible.

6 IN THE EVENT OF AN ALLEGATION OF ABUSE

- 6.1 All complaints, allegations or suspicions must be taken seriously.
- 6.2 This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult or child has been abused.
- 6.3 Promises of confidentiality must not be given as this may conflict with the need to ensure the safety and welfare of the individual.
- 6.4 A full record shall be made as soon as possible of the nature of the allegation and any other relevant information.
- 6.5 This must include information in relation to the date, the time, the place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult or child who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.

7 RESPONDING APPROPRIATELY TO AN ALLEGATION OF ABUSE

- 7.1 Shared Interest recognises that it has a duty to act on reports, or suspicions of abuse. In the event of an incident or disclosure:

DO

- Make sure the individual is safe
- Reassure them
- Assess whether emergency services are required and if needed call them
- Listen to what they are saying
- Offer support and reassurance
- Ascertain and establish the basic facts
- Record what you have been told/witnessed as soon as possible. Ensure notation of dates, time and persons present are correct and agreed
- Take all necessary precautions to preserve evidence
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to the designated Safeguarding person for support and guidance
- Explain the procedure to the individual making the allegation
- Remember the need for ongoing support.

DON'T

- Confront the alleged abuser
- Be judgmental or voice your own opinion
- Be dismissive of the concern
- Investigate or interview beyond what is necessary to establish the basic facts
- Disturb or destroy possible forensic evidence
- Consult with persons not directly involved with the situation
- Ask leading questions
- Assume Information
- Make promises

- Ignore the allegation
- Elaborate in your notes
- Panic
- Promise to keep it a secret

7.2 It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This will be determined by the investigation.

8 MANAGING ALLEGATIONS MADE AGAINST STAFF, VOLUNTEERS, TRUSTEES, NON EXECUTIVES, PARTNERS, CONSULTANTS AND INTERNS

- 8.1 Shared Interest will ensure that any allegations made against those working with them will be dealt with swiftly.
- 8.2 Where it is thought that a criminal offence has been committed, the police must be informed. If a crime has been witnessed, the police should be contacted immediately.
- 8.3 The safety of the individual(s) concerned is paramount and it should be ensured that they are safe and away from the person(s) who are the alleged perpetrators.

9 CONSEQUENCES OF BREACH OF SAFEGUARDING POLICY

9.1 If there is an allegation of a violation of the Safeguarding Policy from a verifiable source, the individual concerned may be suspended from all activity/association with Shared Interest pending the outcome of an independent investigation. The investigation must comply with our reporting procedures. Failure to report and breaches of confidentiality in the process will be subject to investigation and disciplinary procedures where applicable. Following the outcome of the investigation, if it has found that an act has been committed in relation to adults at risk/children, whether within or outside the context of the organisation's work, which is either criminal, grossly infringes the adult at risk/child's rights, or contravenes the principles and standards of this policy, Shared Interest will take immediate disciplinary action and any other action which may be appropriate to the circumstances:

- Employees – disciplinary action/dismissal
- Volunteers, non-executives, trustees and interns – ending the relationship with the organisation.
- Consultants – termination of contract.
- Partners – withdrawal of funding/support/contract

Shared Interest may involve the authorities such as the police and/or social services at any stage of the investigation if appropriate to ensure the protection of vulnerable adults/children and pursue a criminal prosecution where this is applicable.

10 CONFIDENTIALITY

10.1 Adults at risk or child protection raises issues of confidentiality, which must be clearly understood by all.

- 10.2 Clear boundaries of confidentiality must be communicated to all.
- 10.3 All personal information regarding an adult at risk/child will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines.
- 10.4 If an adult or child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff explain to them sensitively and clearly that, he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.
- 10.5 Within that context, the adult or child must, however, be assured that the matter will be disclosed only to people who need to know about it.
- 10.6 Where possible, consent must be obtained from the adult or child before sharing personal information with third parties. In some circumstances, obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult or child is the priority.
- 10.7 Where a disclosure has been made, staff must let the adult or child know the position regarding their role and what action they will have to take as a result.
- 10.8 Staff must assure the adult/child that they will keep them informed of any action to be taken and why. The adult or child's involvement in the process of sharing information must be fully considered and their wishes and feelings taken into account.
- 10.9 This policy needs to be read in conjunction with other policies for the organisation including:
- Disciplinary and Grievance
 - Privacy Policy
 - Recruitment and Selection
 - Volunteer
 - Whistle Blowing
 - Social Media

11 TRAINING

- 11.1 Training will be provided, as appropriate, to ensure that staff, consultants, non-executives, trustees and volunteers are aware of these procedures.

12 RECRUITMENT PROCEDURE

- 12.1 Shared Interest operates procedures that take account of the need to safeguard and promote the welfare of vulnerable adults and children, including arrangements for appropriate checks on new staff, volunteers, non-executives and trustees where applicable.

13 WHISTLE BLOWING POLICY

- 13.1 Shared Interest has a Whistle Blowing Policy and staff should familiarise themselves with this policy. Staff will be supported in its use.

14 MONITORING & REVIEW

- 14.1 Regular monitoring of risks, risk mitigation and the effectiveness of safeguarding measures will be incorporated into Shared Interest's monitoring processes and activities.

14.2 Some ways in which Shared Interest will ensure regular monitoring and review:

- Safeguarding is incorporated into the organisation's risk register and quarterly and annual reporting processes.
- Safeguarding policy requirements are included in Grant and Partnership Agreements with local partner agencies, and contracts with vendors and consultants.
- Child protection and the protection of adults at risk is included as an issue in partner proposal appraisal checklists and in field monitoring report templates.
- Senior management, Board and trustees will regularly review the risk register and organisation reports to ensure that safeguarding measures are in place and effective.
- The policy will be reviewed annually or when it is shown to be necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to UK legislation.

15 TRAINING FOR STAFF, VOLUNTEERS, BOARD AND TRUSTEES

- 15.1 Training will be carried out. The style, approach, and content of training will vary depending on the audience, but will include, at a minimum:

- An introduction/overview of the concepts of child and adults at risk safeguarding.
- A discussion on how safeguarding policies and procedures can protect children and adults at risk, the staff, and the organisation and what can go wrong when there are no procedures in place.
- An introduction to and discussion of the policy, ensuring all participants understand the purpose of the policy, the content, and terminology.

16 CHILD PROTECTION/PROTECTION OF ADULTS AT RISK INTERNATIONALLY

- 16.1 Shared Interest works in a large number of countries and across a broad range of circumstances. Translating child protection/protection of adults at risk across these different contexts and cultures can be difficult. Some legal and cultural frameworks may vary but the commitment from Shared Interest to protect children, young people and adults at risk remains.

A commitment to child protection/protection of adults at risk is fundamental to Shared Interest's partnership approach to work. Shared Interest, through its representatives, will challenge and help new and existing partners (where they are not already doing so) to address child protection/protection of adults at risk issues in their organisation and in the communities in which they work. All Shared Interest partners will be required to explain what measures they have in place to protect children and adults at risk from abuse.

International staff, in the course of their work should support partners in their efforts to increase their awareness, knowledge and skills in relation to child protection/protection of adults at risk issues through the provision of appropriate capacity building and resources.

Where projects involve close contact with children, young people or adults at risk and the partner does not have a written child protection/protection of adult at risks policy, they will be required to adhere to our Code of Conduct.

17 CHILD PROTECTION/PROTECTION OF ADULTS AT RISK CONSIDERATIONS FOR EXISTING AND POTENTIAL INVESTORS AND DONORS

At any point in their lives, our members or enquirers may find themselves financially vulnerable. This could be due to a significant event, loss of income, illness or other life challenges. Shared Interest is committed to ensuring anyone who interacts with investors, enquirers or donors take all reasonable measures to ensure that the risks of harm to welfare are minimised and that the person is treated fairly.

If you are concerned about an investor, donor or enquirer or if you have any concerns that they are being pressured to act in a way that is not in line with their wishes, then you must raise this with the Head of Member Engagement.

Email safeguarding@shared-interest.com.

With the permission of the investor/donor/enquirer, staff may record that an individual requires help with their Share Account or donation. This will help staff members support the individual in the future. This could include making a note of accessibility needs, such as deteriorating sight or hearing, dementia, mobility or long-term health conditions, which effect the person's ability to manage their Share Account.

If you are concerned that the investor is not acting of their own free will, you could ask to speak to the individual alone.

If you are concerned that the investor is confused or acting erratically then you could, with the investor/ enquirers permission, contact others to help such as a family member, or a trusted friend, their solicitor or Social Services.

If you suspect that fraud is happening then this should be reported to the Money Laundering Reporting Officer immediately.

Finance Director is the Designated Money Laundering Reporting Officer
Head of Risk & Compliance is the Deputy Money Laundering Reporting Officer

Email: Safeguarding@sharedinterest.com

18 HANDLING EXTERNAL CONCERNS

Internal concerns are those where persons covered by the policy are the alleged perpetrators, i.e., employees, consultants, partners, volunteers, interns, non executives or trustees.

External concerns are abuses, which would usually be considered criminal under local legislation, and perpetrated by persons not described in the scope of this policy. Shared Interest should not ignore any protection issues of concern; however, abuse in the wider community is an external concern, and Shared Interest and/or its Safeguarding Representative would need to consider how to appropriately and effectively refer issues. Clearly, if a child or adult at risk is in immediate need of attention then staff must act, but must consider how much support they are qualified or able to provide, and recognise when it is best to refer.