

Safeguarding policy

Key policy document information

Introduction

This Safeguarding Policy is the guiding document relating to SDN's commitment and procedures to provide a safe, protective and supportive environment for its staff and the people we work with, with a particular focus on vulnerable groups, such as children. It also encompasses the wider safeguarding responsibilities of staff, to avoid harm to groups extending beyond staff and participants of our work.

Terms and definitions

Associate—an individual or organisation working on behalf of SDN, typically working with us in the capacity of contractor or partner.

Child—in line with the United Nations Convention on the Rights of the Child, and for the purposes of this policy, is defined as any person—girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1).

Participants—this term refers to those we interact with through our programmes, and who are the intended target to benefit from our work. This term should be broadly interpreted, for example, to include children in the communities where we work, where our work could lead to interaction with a child (and therefore present a safeguarding risk), even if a child is not the direct and specific target of our work.

Staff—this includes all employees of SDN in the UK and Nigeria offices, including volunteers and interns.

Safeguarding risk or incident—this refers to potential harm (in the case of a risk) or actual harm (in the case of an incident) to a member of staff or participant. The Code of Conduct indicates a number of specific safeguarding risks and incidents, which could come about as a result of the actions of our staff, but should not be considered an exhaustive list. Note that a risk or incident could come about as a result of the actions of an individual/group of individuals, but could also arise more broadly as a result of SDN's work. For example, in our campaigning activities, it is conceivable that the participation of community members could put them at risk of conflict with another party, such as a security agency. For this reason, it is important that staff should be aware of, and alert to, risks and incidents that could arise as a result of an individual or institutional action.

Harm—an impact arising as a result of discrimination and/or physical and non-physical abuse and exploitation (a number of which are outlined in the Code of Conduct), or the failure to avert a specific safeguarding risk or incident.

Purpose

The purpose of this policy is to ensure that:

- We have in place procedures to prevent and deal with the actions/behaviour of employees, volunteers or other associates or us as an organisation that result in any form of discrimination or abuse, against a member of staff, associate or a person that we work with—particularly vulnerable groups such as children.
- All employees, volunteers or other associates understand and are well supported in meeting their responsibilities to safeguard staff and the people we work with, and are able to identify and take action in response to a safeguarding incident or risk.
- The people we work with through our programmes are aware of our responsibilities to prevent and respond to any harm against them arising from actions and behaviours of our employees, volunteers or other associates, and the routes for reporting such incidents.

Responsibilities

- All employees, volunteers and associates of SDN are required to report any concerns that a person connected to SDN, including staff and participants, is being harmed or at risk of harm as a result of the actions of SDN, or one of its staff or associates. If in doubt, contact the Safeguarding Focal Point.
- A designated Trustee is assigned the responsibility of ensuring that the Board of Trustees fulfil their responsibilities with regard to safeguarding and liaising with management on safeguarding issues.
- The Programmes Director is the Safeguarding Focal Point and the key contact for safeguarding across SDN. Any concerns or incidents, however minor, that may have a direct or indirect impact on the safety of a staff member or participant, must be brought to their attention immediately. In the absence of the Programmes Director, the Executive Director and/or Country Director must be consulted.
- On joining SDN, employees and volunteers receive a copy of our Safeguarding Policy and our Code of Conduct. Staff members will also be required to sign and acknowledge that they have read and will abide by these.
- All staff have a responsibility to consider and help minimise the risks to their colleagues and our participants, especially children and other vulnerable groups within their areas of responsibility, particularly when introducing new activities or working with new partners. A risk assessment must be carried out for any activities involving particularly vulnerable groups, such as children and should take account of the impact of gender on the risks. The risk assessment must be signed off by the line manager responsible for the activity.

Child protection:

Children are a particularly vulnerable group and staff and associates must take all possible efforts to ensure children are protected from any potential and actual harm as a result of the actions of SDN and its staff. Rather than having a stand-alone child protection policy, SDN's Safeguarding Policy has specific child protection requirements. Note that the entirety of the Safeguarding Policy is applicable to children and child protection.

- No SDN activity should involve an individual staff member being alone with a child/children. A parent or guardian should be present during any direct engagement with a child.
- Details which can identify a child should be kept safe and not shared externally. You may need to record these as part of collecting case studies or quotes, but you should keep your notes safe and only pass them on when necessary.
- At present (May 2018), SDN's programme activities do not involve regular direct contact with children. If a member of staff proposes to commence new activities which would involve regular direct contact with children, the Safeguarding Focal Point should be notified. The Safeguarding Focal Point will work with relevant members of staff to put appropriate measures in place, and will also escalate this issue to Senior Management, to consider whether further updates to this policy are required. Appropriate measures may include obtaining a Disclosure and Barring Service (DBS) certificate, where the relevant member of staff is based in the UK.
- At present (May 2018), direct contact with children is most likely to occur as part of SDN's communications activities, which may include taking, holding and passing on details and images of children and other community members, both electronically and in hard copy. Where this is the case:
 - We are responsible for ensuring that we comply with our Data Protection Policy (currently under review) in collecting and retaining data and that images are appropriate and are held as safely as possible. In particular, we must ensure that we have free, prior and informed consent from the child or and their parent or guardian, with clear parameters as to how the image or information will be used, whether real names will be used and how long the image or information will be retained.
 - Access to our computer systems is protected by passwords.
 - Images not in the public domain that are stored outside our computer system are held under the supervision of designated staff members. If information on or images of children and their families have to be discarded or destroyed this must be done in a secure manner.
 - Where relevant, suppliers and agencies working on our behalf must be made aware of our Safeguarding Policy and confirm in writing that they will ensure that their operations offer the same degree of protection and contracts must reflect safeguarding requirements.
 - We will only use children's images or personal information in our work in ways that will safeguard their dignity and protect their rights.
 - We regularly check social media for inappropriate or unauthorised content and always ask for this to be amended or removed where found.

- We ensure that we never collect information on children without a clear need for that particular information and that data is disposed of in line with any consent provided and our Data Protection Policy (currently under review).
- If other specific activities, such as research and community engagement activities do involve direct contact with children, a staff member or associate must ensure that appropriate consideration of safeguarding is given in advance. This is likely to include:
 - A written risk assessment of the activity, setting out the key activities, who might be at risk and the mitigating actions to be taken. Care should be taken to recognise any particular risks associated with gender and safeguards should also take account of any other needs such as disabilities or health conditions.
 - Ensuring that the children they are working with and their parents or guardians are familiar with and understand SDN's approach to safeguarding.
 - Ensuring that appropriate free, prior and informed consent is obtained for any children participating in SDN activities and their parents or guardians. This means that we ask permission of the child (or in the case of children too young to provide consent, their parent or guardian) to take part and informing them of the specific purpose(s) and intended use of any information provided (including how and where) and respect their decision to say no making it clear that there will be absolutely no negative repercussions from denying such consent.
 - SDN's activities should not normally involve children travelling outside of their normal environment (e.g. their home, community, school). If a specific activity is proposed, the Safeguarding Focal Point must be notified, and appropriate measures put in place, including chaperoning arrangements.
- Social media and internet:
 - SDN activities conducted online which could involve engagement with children (e.g. responding to a Facebook comment) or making use of a child's data, must adhere to the same responsibilities outlined above in working directly with children and making use of their data and images.
 - Employees and volunteers should not actively connect with children via social media in the course of SDN activities.

Wider participant protection

Although children represent a specific, particularly vulnerable group, SDN, its staff and associates have a responsibility to ensure the wider group of people we work with are protected from harm. As well as abiding by the SDN Code of Conduct, staff should be aware that safeguarding risks can arise as a result of SDN's activities. For example, in the context of our work, this could involve participants engaging in campaigning activities which could put them at risk of harm, such as from the actions of security agents.

- Where activities involve taking, holding and passing on information, details and images from participants, free, prior and informed consent must be obtained, and any relevant provisions to maintain anonymity taken—particularly where the information provided could be sensitive and place an individual at risk. All relevant provisions for data use and protection outlined in the child protection section of this policy also apply.

- Participants should be made aware of SDN's approach to safeguarding and how to raise a concern or complaint with SDN.
- Staff and associates must take steps to identify groups which could be particularly vulnerable to safeguarding risks as a result of programme activities, and design them to reduce these risks. Particularly vulnerable groups could include children, women, people with disabilities, or those from ethnic minorities (for example, a project to promote women's leadership, could put them at risk of backlash from other groups). A risk assessment should be produced for all SDN projects which includes identify vulnerable groups and risks, and put mitigation actions in place.

Projects implemented through partners

- It is the responsibility of all SDN employees working with partners to ensure that they have assurance that safeguarding arrangements for the project are effective and in line with this Safeguarding Policy.
- Relevant staff must ensure that child safeguarding is mainstreamed in all projects supported by SDN.
- SDN employees must ensure that reporting of all safeguarding incidents is included in internal project reporting for all projects supported by SDN.

Staff protection

In the workplace, and in the conduct of SDN's activities, our staff and associates could be exposed to safeguarding risks. These may result from the actions of an individual/s or through SDN's activities. Risks arising from the actions of staff could include, for example, bullying, discrimination on the basis of gender, and sexual harassment. Risks arising from organisational actions could, for example, include exposure to security risks as a result of conducting SDN activities.

- SDN aims to promote an open, supportive and protective work environment, any complaint reported via SDN's policies and procedures will be dealt with without prejudice and you are encouraged to report if you have been affected by an incident.
- If you become aware of a risk/incident of harm to a colleague, you are expected to report this in accordance with SDN's procedures. In the first instance, this will be discussed, in confidence, with the individual who is reportedly at risk/has been harmed, before taking further steps in accordance with SDN's policies and procedures.
- SDN's security procedures outline its organisational approach for ensuring the safety of its staff during programme activities. Staff must follow security procedures.
- Staff must act in accordance with the Code of Conduct.

Safeguarding risks caused by staff or associates, but not affecting staff or participants

Outside the course of our normal work, other safeguarding issues could arise as a result of the actions of our staff or associates, which do not relate to harm caused to a member of staff or to our participants. This could,

for example, include sexual exploitation of an individual not connected to SDN. The SDN Code of Conduct references a number of these risks, but should not be assumed to be exhaustive.

- Staff must avoid actions which harm individuals not connected to SDN's work and act in accordance with the Code of Conduct.
- If you become aware of an action of a SDN staff member or associate which risks, or has caused actual harm, to an individual not connected to SDN, it is your responsibility to report this as per SDN's procedures.

Safeguarding risks not arising as a result of SDN or staff actions

In the course of our work, we may become aware of a specific safeguarding risk which is not as a result SDN, its staff or associates' actions. For example, this could involve the abuse of a child in a community, or reports of a human rights abuse due to the actions of a security agency.

- SDN staff must act in accordance with the Code of Conduct.
- If an incident is directly observed by a staff member, where relevant and appropriate (e.g. where it would not potentially create a further risk of harm), such incidents should be reported to the relevant authorities of the country in which the incident has taken place. If this is not appropriate, the Safeguarding Focal Point can be consulted on what relevant action SDN can take.
- If an incident has been reported to a SDN staff member via a third party, in the first instance, if it is appropriate, we should advise them to take appropriate action to report the incident themselves. If reporting the incident would place the third party at risk, the Safeguarding Focal Point can be consulted on what relevant action SDN can take.

Reporting concerns and taking action

It is everyone's responsibility to report a significant risk of harm or incident where harm has occurred.

- You must report a significant risk or incident to the Safeguarding Focal Point, either in writing, in person or over the phone. In the absence of the Safeguarding Focal Point, report this to the Executive Director and Country Director. If, for whatever reason, you feel unable to report the incident to the Safeguarding Focal Point, or if the incident relates to the Safeguarding Focal Point, this should be reported instead to the Executive Director and/or Country Director.
- To ensure visibility to others beyond the Safeguarding Focal Point, once you have reported the incident, you should advise the Executive Director and Country Director of this (or if your concern relates to the Executive Director and/or Country Director, at least one other member of Senior Management staff).

Reports will be kept confidential and will only be shared with relevant people and authorities in order to take decisions to protect the individual/s involved, to comply with legal requirements, or to enable appropriate action to be taken in response to the actions or staff or associates.

Where relevant, the Safeguarding Focal Point will consult management to determine whether SDN needs to report an incident to other authorities. The Safeguarding Focal Point is then responsible for reporting this directly or should ensure a relevant member of staff does this.

Where a staff or Board member is considered to be a risk in any way to children, the circumstances will be considered by the Executive Director and/or the relevant Board member with responsibility for child protection and handled in accordance with our Code of Conduct and disciplinary procedures.

The Safeguarding Focal Point is responsible for reporting a summary of incidents to the board for board meetings.

ENDS