

# Safeguarding policy and procedures

June 2021

#### Our commitment

Our faith tells us that human beings are created in the image of God, and that we should all use our power, skills and resources for good. The central principle to safeguarding at Christian Aid is that everyone is equal in the sight of God. Christian Aid is committed to providing a safe and trusted environment for every person connected with our work.

The purpose of this policy is to protect people from any safeguarding harm that may be caused by their contact with Christian Aid. In particular, the people and communities with whom we work, staff, volunteers, partners, consultants, contractors and trustees, who together form our Christian Aid community.

Christian Aid has a zero-tolerance approach to **any form of violence**, **abuse**, **harassment or exploitation**. We will not tolerate any related misconduct from staff, trustees, volunteers, consultants, partners or any representatives associated with Christian Aid or its partners.

#### Personal responsibility

It is the responsibility of all representatives of Christian Aid to prevent and report physical, sexual, emotional abuse or neglect of any member of our community. The welfare of these individuals is paramount. Without exception, everyone associated with Christian Aid and its work has the right to protection from abuse – regardless of gender, ethnicity, disability, sexuality or belief.

As a member of the Christian Aid community, you have the responsibility to raise any concerns you have, or concerns which are reported to you. It is not your responsibility to decide if an incident has taken place or whether an incident constitutes a safeguarding breach. This is the responsibility of the Safeguarding Manager.

#### Policy development

The Christian Aid Safeguarding Policy has been developed utilising global best practice and using the experience and expertise of colleagues working with ACT Alliance, the Core Humanitarian Standard on Quality and Accountability (CHS) and Bond.

# **Policy application**

This policy applies to Christian Aid's activities worldwide, including all overseas offices and branches, Christian Aid Ireland and all separate legal entities owned and controlled by Christian Aid. The policy also applies to all those engaged, commissioned or contracted to work with or on behalf of Christian Aid in any capacity, both during and outside of normal working hours.

Christian Aid requires all partners and consortium members to have a Code of Conduct or equivalent standards that set out, at a minimum, the obligation of staff not to exploit, abuse or otherwise discriminate. Christian Aid will work with all partners to adopt policies, practices and associated measures to ensure the Code of Conduct is established and communicated to relevant stakeholders, especially the people and communities with whom the partners work. Christian Aid expects all partners to have appropriate safeguarding policies and procedures in place and makes its own policy and procedures available to them.

Christian Aid will ensure that all those who work or volunteer with us have a clear understanding of what is required by this policy and what to do if they have any concerns.

# 1. Scope

1.1. This is a global, organisation-wide policy, which should be adapted as required by local law. Where UK law provides a higher standard, this must always be adopted. The Safeguarding Manager is available to provide advice on this.

1.2. While this is an internal policy, we expect partners and others working on behalf of Christian Aid to act in accordance with its key principles, and specific compliance requirements in respect of safeguarding as set out in relevant contractual agreements and included in our due diligence process.

# 2. Policy principles, roles and responsibilities

The principles in this policy have been drawn from key international and regional sources, including International Standards for Keeping Children Safe, the UN Convention on the Rights of a Child, IASC Minimum Operating Standards for PSEA and the Core Humanitarian Standard on Quality and Accountability.

Christian Aid is committed to:

- Safeguarding the people and communities with whom we work, staff, volunteers and all those connected with our activities, and ensuring they have equal rights to protection from harm.
- Creating and maintaining a safe organisational culture for all representatives of Christian Aid and those coming into contact with our work.
- Ensuring all our staff, trustees, volunteers, consultants, contractors, partners and representatives of Christian Aid are familiar with this policy and understand their responsibilities.
- Ensuring our partners are aware of their responsibilities as to the minimum requirements of safeguarding standards and supporting them in achieving this.
- Ensuring that all staff, volunteers and trustees receive safeguarding training.
- Supporting staff and all people involved in our work to navigate online spaces, and use equipment and online tools, safely and effectively.
- Ensuring concerns or allegations are taken seriously, investigated and acted upon appropriately.
- Placing the survivor at the centre of our response, and considering their needs, safety and wishes first and foremost. The survivor's well-being is prioritised over and above protecting the organisation's reputation.
- Ensuring all actions to protect people are taken in the best interests of the person at risk.
- Ensuring that survivors of abuse are supported and alleged perpetrators, where we are able, are held to account.
- Ensuring our recruitment practices are robust enough to ensure we never recruit anyone who poses a known risk.
- Ensuring that alleged perpetrators of abuse are treated fairly and in accordance with local law.
- Ensuring criminal acts are reported to the relevant statutory agency, in accordance with our <u>Reporting Criminal Wrongdoing Policy</u>, taking account of the wishes of the survivor and risks.
- Reporting safeguarding incidents to the Charity Commission in the UK, in line with our <u>Serious Incident Reporting Policy</u>.
- Ensuring concerns around modern slavery are reported and acted upon appropriately.
- Reporting incidents to relevant donors.

- Designing and delivering programmes which are safe for all and are based on the 'do no harm' principles.
- Ensuring the people and communities we work with are fully aware of the expected behaviour of our staff, volunteers, trustees, consultants and partners. Ensuring that functioning community complaints, feedback and response mechanisms, are designed based on community preference, and designed to receive safeguarding complaints

#### 2.1 Roles and responsibilities

**Trustees and directors** are responsible for setting the tone on safeguarding. Internal communications and other measures are used to raise awareness of key risks and the importance and value of safeguarding. See section 9 for more detail on governance oversight.

**Extended leadership team** members are responsible for ensuring they and their teams understand and comply with the requirements of this policy. They share the leadership responsibility of the directors.

**Safeguarding Governance Group** is responsible for providing oversight of Christian Aid's safeguarding work and for ensuring that safeguarding priorities are appropriately resourced.

All representatives of Christian Aid are responsible for complying with this policy, taking measures to prevent incidents from occurring, and reporting actual or suspected incidents.

The **Safeguarding Manager** is a focal point and professional adviser on safeguarding risk within Christian Aid. Their responsibilities include acting as an advisor to colleagues to build sharing of learnings, knowledge and resources on the prevention of risks, including through implementation of appropriate training and communications, and response to reported incidents.

The **Global Safeguarding Adviser and Regional Coordinators** are responsible for providing support and training to in country Safeguarding Focal Points and programme staff on how to prevent and respond to safeguarding concerns. They also raise awareness and promote best practice. **Safeguarding Focal Points** are responsible for providing support to prevent and respond to safeguarding incidents. They report concerns confidentially and support survivors. They also raise awareness and promote best practice.

The **Head of Audit, Risk and Assurance** provides overall leadership of safeguarding risk management. They are the line manager of the Safeguarding Manager and provide support for serious incidents.

**Programme teams** are responsible for safe, accessible and culturally appropriate consultation with communities to ensure that communities and those representing Christian Aid are familiar with this policy and Christian Aid's Code of Conduct. They explain the expected behaviour of Christian Aid representatives, how to raise concerns, and that Christian Aid will take all concerns seriously and will respond appropriately and ensure that Partner Assurances are delivered.

#### 3. Definitions

#### 3.1 Safeguarding

This means protecting people from any intentional or unintentional harm that may arise following contact with Christian Aid representatives or in the delivery of our work. Part of safeguarding is taking all possible steps to prevent harm, to enable reporting of harm and to respond appropriately when harm does occur.

# 3.2 Survivor

An individual who has experienced or been targeted by abuse, violence, exploitation or neglect. Survivor infers the individual has resilience and, with support, will recover. The person may prefer to use victim instead; it is their choice which term to use.

# 3.3. Vulnerability

People may be vulnerable because of individual factors, such as age (particularly the very young and the very old), disability or illness, or because they are caring for others who are vulnerable.

Social and contextual factors also contribute to vulnerability. These include systemic factors, such as poverty, discrimination and marginalisation (on the basis of race, ethnicity, class, caste, religion, political affiliations, gender identity or sexual orientation); social isolation (including the lack of access to information); climate and environmental issues (including the effects of the climate crisis, lack of land tenure and environmental degradation); and poor governance.

# 3.4. Child

A child is defined as anyone under 18 years old, irrespective of local definition.

# 3.5 Adult at risk

An adult at risk is a person over 18 years old who may need care because of mental health or other visible or invisible disabilities, age or illness; and who may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation. Also referred to as a vulnerable adult.

Adults are more likely to be at risk due to societal and systemic factors. These include living in societies where abuses such as gender-based violence are more prevalent; where there are unequal power dynamics, such as racially or ethnically rooted inequalities; or where local laws and authorities are weak in protecting against and responding to abuse.

# 3.5. Abuse

Abuse may be caused by inflicting harm, failing to prevent harm, threatening harm or attempting to harm someone. In order to safeguard all those in our community, we adhere to the principles of a number of UN Articles.

• For children, we adhere to the UN Convention on the Rights of the Child and have as our starting point as a definition of abuse, Article 19 which states: Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

 Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.

In addition, for adults, we adhere to the UN Universal Declaration of Human Rights, with particular reference to Article 5, which states:

 No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Abuse may include, but is not exclusive to, the following.

**Physical abuse** or physical injury, where there is definite knowledge or reasonable suspicion that injury was inflicted or knowingly not prevented.

**Emotional abuse** is where harm is done by persistent or severe emotional ill treatment or rejection, such as degrading punishments, threats and not giving care and affection.

**Sexual abuse** is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual assault (attempted rape, kissing/touching, forcing someone to perform oral sex/touching) as well as rape.

**Sexual exploitation** is actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes. It includes profiting monetarily, socially or politically from sexual exploitation of another person. Under UN regulations, it includes transactional sex, solicitation of transactional sex and exploitative relationship.

**Neglect** is where basic needs, such as food, warmth, basic hygiene and medical care are not met, or when there is a failure to protect a person from exposure to danger.

**Sexual harassment** is a continuum of unacceptable and unwelcome behaviours and practices of a sexual nature. These include, but are not limited to, sexual suggestions or demands, requests for sexual favours, and sexual, verbal or physical conduct or gestures that are or might reasonably be perceived as offensive or humiliating.

**Modern slavery** is the severe exploitation of other people for personal or commercial gain. It takes many forms, and some of the most common are human trafficking, forced labour, bonded labour, child slavery, and forced and early marriage.

**Online abuse** includes cyber bullying, harassment and stalking, the creation and sharing of sexually explicit materials, grooming or being persuaded to perform sexual acts online or being exposed to sexual content.

# 4. Reporting

Under no circumstances should any individual attempt to deal with the problem of abuse directly. An investigation team will be established, supported by the Safeguarding Manager.

#### 4.1. What to do when you suspect abuse

Actual, potential or suspected incidents of abuse must be reported immediately. It is preferable that you report directly to the Safeguarding Manager through the safeguarding inbox (**safeguarding@christian-aid.org**). However, where appropriate, you can make

a report to your Safeguarding Focal Point who will inform the Safeguarding Manager immediately The Safeguarding Manager will ensure that the matter is appropriately investigated. Alternative reporting mechanisms are noted below in sections 4.3 and 4.4.

The need to report arises in the following instances:

- Abuse is observed or suspected
- An allegation of abuse is made
- Someone discloses abuse

No representative of Christian Aid will prejudice their own position or standing with Christian Aid by responsibly reporting potential or suspected abuse; in fact, Christian Aid requires people to do so.

4.1.1. Survivors of abuse are entitled to support services. Some people, particularly children, may require specialised support services. Christian Aid will support survivors in line with our <u>guidance on supporting survivors of harm, exploitation and abuse</u>. Christian Aid is committed to referring survivors to confidential and safe support services, as appropriate and available, and according to survivor's wants and needs.

Staff should familiarise themselves with the guidance. In all circumstances where there is an allegation, the Safeguarding Manager will provide advice on the approach to supporting the survivor.

4.1.2. It is important to note that where representatives report concerns, it **is not their responsibility** to decide if abuse is taking place, but it is their responsibility to pass on these concerns. Care must be taken regarding confidentiality and the sharing of information with appropriate people.

4.1.3. Information given should be written in a report as soon as possible after the concern was raised (within 24 hours if possible). Any written records taken must be kept securely in a locked place or in a confidential electronic folder.

#### 4.2. Contacts for reporting concerns

The Christian Aid Safeguarding Manager is:

#### Eoghan Walsh

Interchurch House, London, UK.

If you would prefer to raise a concern by email, contact:

#### safeguarding@christian-aid.org

This email address is monitored by the Safeguarding Manager, the Head of Audit, Risk and Assurance, and the Head of People UK and Ireland.

#### 4.3. Safeguarding Trustee

If an individual raising a safeguarding concern believes there are outstanding or unresolved issues or that there has been unreasonable delay in handling or addressing the concern or wishes to raise a concern about the Safeguarding Manager or other senior members of staff, they can contact Christian Aid's principle Safeguarding Trustee. The Safeguarding Trustee is:

### Hazel Baird

safeguardingtrustee@christian-aid.org

# 4.4. Whistleblowing email

Alternatively, you can make a confidential report using the Speaking Up (whistleblowing) email:

#### whistleblowing@christian-aid.org

This email address is highly confidential and only monitored by the Head of Audit, Risk and Assurance, and the Head of Counter Fraud.

You can also make a confidential report to **any** of the people named in the Speaking Up (Whistleblowing) Policy.

# 4.5. Raising a concern outside Christian Aid

If you wish to raise a concern outside of Christian Aid's reporting channels, then you can obtain advice from thirtyone:eight. Thirtyone:eight is an independent Christian charity which helps educate, inform and support people and organisations, to protect vulnerable people from abuse.

Email: info@thirtyoneeight.org

Within the UK, phone 0303 003 1111 (option 2).

# 4.6. Your right to privacy

We value your right to privacy as a first principle and every effort will be made to keep your information confidential. You do not have to provide personal details; however, such information will assist us in taking forward your concerns and enable us to provide you with a response about the outcome. If you ask us not to disclose your identity, we will not do so without your consent, unless required by law.

#### 5. Our response

#### 5.1 Confidentiality and data

Christian Aid has a responsibility to protect the confidentiality of everyone involved in a safeguarding complaint. This includes complainants, survivors, witnesses and the subject of the complaint. Every effort will be made to maintain confidentiality throughout our response to a complaint.

Case information will be limited to essential personnel and will not be shared further unless necessary and safe to do so. Representatives involved in the investigation process will be made aware of the importance of maintaining confidentiality. Representatives who breach confidentiality may be subject to disciplinary action. Nonidentifying information will be shared with donors and legislators where reporting requirements require it.

Christian Aid will take every reasonable precaution to ensure that systems are in place to safeguard any personal data, so it does not place people at risk or make them vulnerable to any form of harm. Staff must adhere to Christian Aid's <u>Data Protection</u> and Data Retention policies.

## 5.2 Investigation

Christian Aid takes all safeguarding concerns and allegations very seriously and will investigate all matters where there is a case to do so. This is regardless of role or rank within our organisation. Our Safeguarding Investigation Policy and Procedure provides clear guidance on how staff should conduct safeguarding investigations in line with our survivor-centred approach. In all cases, investigation support will be provided by the Safeguarding Manager or a senior member of the Audit, Risk and Assurance Team.

#### 5.3. Disciplinary action

Christian Aid will take disciplinary action against any staff, or others, who are found to have breached our Code of Conduct and Safeguarding Policy. If such an incident occurs, Christian Aid's disciplinary policy will be invoked.

#### 5.4. Identifiable information and false allegations

Identifiable information about safeguarding should be shared on a 'need to know' basis only. Any staff members who raise concerns of serious malpractice should be protected as far as possible from victimisation or any other detrimental treatment if they come forward with concerns, provided that concerns are raised in good faith. Deliberate false allegations constitute a serious disciplinary offence, if it is found that allegations have been made maliciously, the complainant's actions will be investigated by Christian Aid.

#### 5.5. Statutory reporting

The Safeguarding Manager will ensure that reports are made to the Charity Commission, relevant donors and where applicable to relevant statutory authorities across our jurisdictions as appropriate. Where applicable, the Safeguarding Manager will work with local authority safeguarding boards and the Local Authority Designated Officer when responding to safeguarding concerns in the UK where a case involves UK nationals.

#### 5.6. Retaliation

Christian Aid will not tolerate anyone who wishes to seek or carry out retaliatory action against complainants, survivors, witnesses, the subject(s) of complaint, investigators or anyone else involved in a safeguarding investigation. Representatives may be subject to disciplinary action, up to and including termination of employment. Others who work with Christian Aid may have their relationship terminated.

#### 5.7 Learning

Christian Aid is committed to learning from the safeguarding complaints we receive. By reviewing complaints and investigations, we can identify improvements to be made to policy, procedures and practice to help help prevent similar incidents from occurring again

#### 5.8 Frequently asked questions

Please see Annex 1 at the end of this document.

#### 6. Recruitment

Staff should refer to the relevant <u>HR policies</u> when recruiting.

#### 6.1. People who shall not work with Christian Aid

No one shall work within Christian Aid who:

- Has been convicted of or has received a formal police caution concerning an offence against children; or
- Has been convicted of or has received a formal police caution concerning sexual offences against adults; or
- Is notified to us as having a red flag in relation to safeguarding by a former employer

# 6.2. Recruitment

Christian Aid will ensure all workers will be recruited, appointed, trained, supported and supervised in accordance with local government guidance on safe recruitment. This includes ensuring that:

- There is a written job description/person specification for the post.
- Those applying have completed an application form, including a self-declaration disclosure in relation to safeguarding.
- Those short listed have been interviewed by a diverse, gender-balanced panel consisting of three members.
- Safeguarding has been discussed at interview where the applicant will be working with children, adults at-risk and/or with communities.
- Gaps in work history have been discussed.
- Two references have been obtained, including one from the most recent employer.
- A Disclosure and Barring Service (DBS) check or local equivalent is completed, where available and appropriate for the role or safe to do so.
- Qualifications where relevant have been verified.
- A suitable training programme is provided for the successful applicant.
- The applicant completes a probationary period.
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.
- The successful applicant signs Christian Aid's Code of Conduct and performs the on-line training on appointment and annually thereafter.

# 6.3 Providing references for employees leaving Christian Aid

In line with data protection and other relevant legislation, where possible Christian Aid will provide a statement confirming the circumstance of the termination of a person who worked for Christian Aid (this includes staff, trustees, volunteers and interns), and details of disciplinary actions (red flags) in relation to breaches of the safeguarding or code of conduct policies.

In line with procedures, references should only be sent out to future employers from either the People Function or the individual's line manager.

# 6.4. Code of Conduct

All staff, trustees, consultants and volunteers and representatives of Christian Aid must follow the Code of Conduct.

# 7. Programming, communities, partners and consortium members

7.1. Christian Aid works in many countries and across a broad range of circumstances. Translating safeguarding across these different contexts and cultures can be difficult. While legal and cultural frameworks vary, the commitment from Christian Aid to protect people remains.

7.2. Christian Aid has a commitment to design and deliver programmes which are safe for people. This will ensure that programmes and projects are risk assessed to consider both intentional and unintentional harm, including in the areas of people's safety, security, dignity and rights, and that safeguarding good practice is embedded throughout the programme and project cycle.

7.3 Staff should consult with communities and the people we work with on the design, implementation and monitoring of feedback and complaints mechanisms to ensure they are accessible and functional. Communities must also be provided with information on the principles Christian Aid and its representatives adhere to, as well as the expected behaviour of our staff, representatives and partners, in a language and format that is accessible to them.

7.4. A commitment to safeguarding is fundamental to Christian Aid's partnership approach to work. Christian Aid will challenge and help new and existing partners and consortium members to address safeguarding in their organisation and in the communities in which they work, if they are not already doing so. All Christian Aid partners and consortium members are required to have a safeguarding policy, code of conduct and promote a culture of safeguarding within their organisations.

7.5. In the course of their work, international staff should support partners and consortium members in their efforts to increase their awareness, knowledge and skills in relation to safeguarding issues through the provision of appropriate training and resources and sharing knowledge and learnings.

7.6. If a new partner or consortium member does not have safeguarding policies in place, or their polices do not meet Christian Aid standards, programme staff should ensure the partner signs the interim safeguarding commitments and a timebound plan is put in place to develop their own organisational policies. Christian Aid will support partners to do this. In all circumstances, Christian Aid's Safeguarding Policy will be provided to partners and consortium members working with Christian Aid and partners and consortium members will commit to reporting any incidents to Christian Aid in line with our Funding & Reporting Agreement.

7.7. Safeguarding concerns may be more likely in emergency situations, particularly where people are displaced and separated from their families, or where the family is under extreme stress; in such situations, people are particularly vulnerable. In emergency situations, Christian Aid representatives are expected to be extra vigilant, to follow the Code of Conduct, ensure reporting mechanisms are place and support partners to ensure people are protected from harm.

7.8. When Christian Aid becomes aware of a complaint about a partner or consortium member, Christian Aid expects the partner or consortium member to respond appropriately, quickly and confidentially. If necessary, Christian Aid will support the partner to ensure the investigation is conducted appropriately.

If the investigation substantiates that abuse is likely to have occurred, ongoing work with the partner or consortium member cannot involve the individual(s) concerned. If there is reason to believe that an allegation has been dealt with inappropriately by a partner or consortium member, then they risk withdrawal of funding or ending the relationship.

#### 8. Fundraising and other interactions

'Supporter fundraising' refers to the engagement of individuals, churches and communities and foundations in their voluntary support of Christian Aid's work around the world. Christian Aid has dedicated policies for fundraising, Fundraising and Responding to Vulnerable People, and our Supporter Fundraising Policy.

8.2. All staff and volunteers are orientated on Safeguarding Policy and Procedure alongside tailored safeguarding training.

#### 9. Governance and oversight

The **Christian Aid Board** has ultimate responsibility for safeguarding, approving the safeguarding policy annually and receiving an annual report on the implementation of safeguarding policy and procedure.

The **Audit and Risk Committee** provides oversight of the effective implementation of the Safeguarding Policy on behalf of the board. It receives confidential reports on incidents and also approves reporting, where applicable, to the Charity Commission under the Serious Incident Reporting Policy.

The **Safeguarding Governance Group** ensures that Christian Aid meets its regulatory requirements and oversees the implementation of actions to further embed the policy in all areas of Christian Aid's work.

Safeguarding has been identified as a separate risk on our corporate risk register. The corporate risk register is updated three times a year by the directorate and is reviewed in each of the Audit and Risk Committee meetings.

# Annex 1: FAQs about incident reporting

#### Why is it important that we report incidents or concerns?

Reporting actual, suspected or potential incidents is a key component of effectively managing safeguarding risks and a requirement for all Christian Aid representatives, partners and other recipients of Christian Aid grant funding (with reporting requirements set out in the Funding & Reporting agreement). It allows steps to be taken to protect the survivor, prevent further abuse from taking place, supports timely and transparent reporting to statutory authorities, our regulator and donors, and other relevant parties, and supports our ongoing risk management by allowing lessons to be learned.

#### What are the risks of failing to report incidents or concerns?

Delaying or failing to report safeguarding incidents exposes survivors and Christian Aid to significant risks. Survivors may experience further abuse whilst Christian Aid risks committing a criminal offence under UK law by failing to make mandatory reports to relevant statutory authorities, as well as breaching donor contracts and other regulatory duties.

#### Why is it important that partners report incidents or concerns?

Timely and transparent reporting of incidents by partners is seen by Christian Aid as a sign of a strong partnership and a healthy approach to safeguarding. We recognise that when working in complex environments, safeguarding incidents are possible, even if effective risk mitigation has been put in place. If a partner reports an incident, we will seek to work with the partner in a collaborative way to fully establish the facts, support survivors and reduce the risk of future incidents from occurring. It is probable that we will also need to notify our back donors and may also need to inform our regulator and where appropriate statutory authorities in the UK. We understand partners may be concerned about the impact of reporting an incident on their partnership with Christian Aid. Christian Aid encourages reporting of safeguarding incidents, and sees reporting as a positive sign that safeguarding measures exist and are functioning.

In rare cases, we may need to review our ongoing relationship with a partner in response to a safeguarding incident. However, this is the exception. Our preferred approach is to seek to work with partners to resolve the issue, support programme continuity and reduce the risk of future incidents.

# Policy Reference Information

| Status                     | Final                               |
|----------------------------|-------------------------------------|
| Author/Lead                | Eoghan Walsh – Safeguarding Manager |
| Date Policy Created        | June 2018                           |
| Date of Last Review        | June 2021                           |
| Date of Next Formal Review | June 2022                           |
|                            |                                     |

# **Related Policies and Information**

| Title  |  |
|--|--|
| Code of Conduct  |  |
| Whistleblowing   |  |
| Disciplinary   |  |
| Policy for fundraising & responding to vulnerable people |  |
| Supporter fundraising policy                             |  |
| Bullying and Harassment                                  |  |
| Safeguarding Investigation Policy & Procedure            |  |
| Survivor Support Guidance                                |  |