

**HOPE
AND
HOMES
FOR
CHILDREN**



SAFEGUARDING POLICY

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hopeandhomes.org

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Hope and Homes for Children is an international charity working to ensure that all children have the chance to grow up in the love of a family.

Our **vision** is a world in which children no longer suffer institutional care.

Our **mission** is to be the catalyst for the global eradication of institutional care of children.

Our **aim** is that by December 2030 worldwide, we will be approaching a consensus that orphanages will be an unacceptable way of caring for children. 2027wi

Safeguarding of children and vulnerable adults is a primary focus in all our programmes, fundraising, communications and planning.

INTRODUCTION

Hope and Homes for Children (HHC) aims to ensure the safety and wellbeing of children and vulnerable adults and to safeguard them from maltreatment. We believe that everyone has the right to *feel* and to *be* safe. We take every possible measure to ensure that our staff, volunteers, partners, and associates do everything within their power to promote safe environments for children and vulnerable adults.

This Safeguarding Policy provides a framework of principles, standards and guidelines upon which to base individual and organisational practice in relation to:

- Creating a child safe and child friendly organisation;
- Preventing maltreatment;
- Providing guidelines for appropriate and inappropriate behaviour;
- Recognising, reporting and responding to allegations of maltreatment;
- Putting in place guidelines for communications regarding children and vulnerable adults.

GUIDING PRINCIPLES

This Safeguarding Policy draws on: Keeping Children Safe safeguarding standards; international and regional protocols and conventions including the UN Convention on the Rights of the Child 1989 (and its optional protocols); UNSG's Bulletin Commitment to Eliminate Sexual Exploitation and Abuse, 2003 and ii) the Inter-Agency Standing Committee Task Force on Prevention and Response to Sexual Exploitation and Abuse (Updated in 2019) and the BOND Guidelines on Images and Messages

HHC believes that all staff, partners, volunteers, and the children and adults we work with have the right to work and live in a safe environment free from abuse and exploitation and therefore operates a zero-tolerance policy with regards to any form of abuse of power resulting in sexual abuse, exploitation and harassment. All HHC staff and affiliates have a responsibility to provide a safe environment for children and adults. All staff will be required to safeguard children and adults' wellbeing and work to maintain public trust in the organisation. Staff are expected to demonstrate this commitment by holding themselves and colleagues accountable for their adherence to the organisation's safeguarding policies and ensure they do not abuse their position of power and cause any harm to children, vulnerable adults and to other staff and affiliates.

Principles underpinning HHC's Safeguarding Policy are as follows:

- All children and vulnerable adults have equal rights to protection from maltreatment;
- All children should have the opportunity to grow up within the love and security of a family;
- All children should be encouraged to fulfil their potential and inequalities should be challenged;
- Everyone has a responsibility to support the care and protection of children and vulnerable adults;
- Non-Governmental Organisations have a duty of care to individuals with whom they work and with whom their representatives work;
- If agencies work through partners they have a responsibility to ensure that minimum standards of protection are met for the children and vulnerable adults in their partners' programmes.

HHC commits to:

- valuing and listening to all children and young people;
- ensuring that all staff and people directly associated with our work understand their personal responsibility to prevent and report any form of child abuse and sexual exploitation of children;
- ensuring that the organisation creates the right culture and a safe and trusted environment for anyone to report all safeguarding incidents and/or concerns verbally or in writing and through child friendly and accessible mechanisms;
- all safeguarding actions and decisions are taken in the best interests of the child and put the safety and welfare of the child first;

HHC will meet its commitment to safeguard children, vulnerable adults and colleagues through the following means:

Awareness

Ensuring that all staff members, volunteers and partners have a solid awareness of safeguarding, maltreatment and risks to children and vulnerable adults.

Prevention

Ensuring, through awareness and good practice, that staff members, volunteers and partners prioritise children's safety and wellbeing and minimise risks to children and vulnerable adults.

Ensuring, through promoting identity, life skills and participation, that children and vulnerable adults, wherever possible, are active agents in their own protection.

Reporting

Ensuring that staff members, volunteers and partners take seriously any concerns raised and that they are clear on the steps to take regarding the safety of children and vulnerable adults. Ensuring that we create a positive safeguarding culture where people *feel* and *are* safe to report concerns.

Responding

Ensuring that appropriate and effective action is taken to support and protect children and vulnerable adults where concerns arise regarding possible maltreatment. Ensuring that this action is documented and monitored.

Being accountable

Ensuring that the voices of children are heard, and that when we agree to act on something they tell us, they can hold us accountable for it.

HHC will also ensure that safeguarding will be identified as a specific goal in all programme designs, including through promoting children's participation in programme design, implementation and evaluation.

Culture

HHC commits to growing a healthy organisational culture where safeguarding is embedded in everything we do and is owned by all staff across the organization. This culture, based on the HHC values of excellence, courage and integrity, will be modelled by trustees, senior managers and directors, and will ensure an ongoing examination of where power lies in the organisation and how it is used, alongside the development of a respectful and open communication between children, young people, staff and managers (see Annex 3).

SCOPE

This policy applies to all HHC board members, staff members, volunteers, interns and associates anywhere in the world. The Board of Trustees has approved the policy. We expect partner organisations to share our commitment to safeguarding and to have their own equivalent policy; where they do not then this policy will apply.

DEFINING CHILD MALTREATMENT

Child maltreatment is defined by the World Health Organisation as '*all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power*'¹.

Maltreatment almost invariably entails an abuse of power: someone with greater power exercises that power in a way that results in harm to the child or vulnerable adult. A person may maltreat a child by inflicting harm, or by failing to act to prevent harm. Children may be maltreated in a family, institution, or community setting, by those known to them or, more rarely, by a stranger. They may be maltreated by an adult or adults or another child or children. Maltreatment also includes the trafficking of children for forced labour or sexual exploitation and the harmful, exploitative or neglectful ways of collecting, storing and publishing images and information about children.

Below we identify five main categories of child maltreatment:

Physical abuse

¹ Report of the consultation on child abuse prevention, 29–31 March 1999. Geneva, World Health Organization, 1999 (document WHO/HSC/PVI/99.1).

The intentional use of physical force against a child that results in – or has a high likelihood of resulting in – harm for the child’s health, survival, development or dignity.

Sexual abuse

The involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared, or else that violates the laws or social taboos of society. Children can be sexually abused by both adults and other children who are – by virtue of their age or stage of development – in a position of responsibility, trust or power over the victim.

Emotional and psychological abuse

Includes both isolated incidents, as well as a pattern of failure on the part of a parent or caregiver to provide a developmentally appropriate and supportive environment. Acts in this category may have a high probability of damaging the child’s physical, mental, spiritual, moral or social health and development. Abuse of this type includes: the restriction of movement; patterns of belittling, blaming, threatening, frightening, discriminating against or ridiculing; and other non-physical forms of rejection or hostile treatment.

Neglect

Includes both isolated incidents, as well as a pattern of failure on the part of a parent or caregiver to provide for the development and well-being of the child – where the parent is in a position to do so – in one or more of the following areas: health; education; emotional development; nutrition; shelter and safe living conditions.

Discriminatory abuse

Includes the unequal treatment of a child or vulnerable adult based on age, disability, gender, marriage, pregnancy, race, ethnicity, religion and belief, sex or sexual orientation.

Annex 1 provides more information about the effects of maltreatment, vulnerability to maltreatment and identifying maltreatment.

PREVENTION

The protection of children and vulnerable adults from harm is addressed through the following:

Behaviour Protocols

HHC leads by example and puts the best interest of children and vulnerable adults as the primary consideration in all of our interventions. Every representative of HHC must demonstrate the highest standards of behaviour and conduct and is personally responsible to meet the safeguarding obligations, both in their personal and professional life, 24 hours a day, 7 days a week.

HHC takes an approach of zero tolerance towards all forms of bullying, harassment, sexual exploitation and abuse or any other form of maltreatment, whether towards children, vulnerable adults, colleagues or anyone else.

HHC requires its staff and associates to follow certain rules in order to ensure the safety of children and vulnerable adults. These are described here:

Promoting Children's Rights

A key element in working to safeguard the welfare of all children and vulnerable adults is the promotion of their rights. HHC believes that children and vulnerable adults have the right:

- To have their health, safety and wellbeing, and their best interests considered paramount;
- To have their welfare and development promoted and safeguarded so that they can achieve their full potential;
- To be valued, respected and understood within the context of their own culture, religion and ethnicity, and to have their needs identified and met within this context and within the context of their family wherever possible;
- To be listened to and to have their views given careful consideration, and to be encouraged and helped to participate in decisions which affect them. This in turn enhances safety as when children and vulnerable adults have opportunities to participate and feel their contributions are valued, they are more likely to speak up when harmed or feeling unsafe.

In order that these rights are respected, when staff and others are in contact with children and vulnerable adults, they should:

- Treat them equitably and recognise them as individuals at all times;
- Treat each with dignity, respect, sensitivity and fairness;
- Regard them positively and value them as individuals who have specific needs and rights and a particular contribution to make;
- Work with them in a spirit of co-operation and partnership based on mutual trust and respect;
- Value their views and take them seriously;
- Work with them in ways that enhance their inherent capacities and capabilities and develop their potential;
- Strive to understand them within the context in which they live

Code of Practice and Behaviour

HHC takes an approach of zero tolerance towards all forms of bullying, harassment, sexual exploitation and abuse or any other form of maltreatment, whether towards children, vulnerable adults, colleagues or anyone else.

It is important for all staff and others in contact with children and vulnerable adults to:

- Be aware of situations which may present risks and manage these appropriately;
- Plan and organise the work and the workplace so as to minimise risks;
- Be visible in working with children and vulnerable adults as far as possible;
- Ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed

- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged;
- Talk to children and vulnerable adults about their contact with staff or others and encourage them to raise any concerns;
- Discuss with children and vulnerable adults their rights, what is acceptable and unacceptable, and what they can do if there is a problem;
- Promote the use of positive ways of managing the behaviour of children that does not involve physical punishment or other forms of degrading or humiliating treatment;
- Give enthusiastic and constructive feedback rather than negative criticism;
- Provide advice and support to children and vulnerable adults on how to keep themselves safe;
- Seek agreement of the child or vulnerable adult prior to any physical contact;
- Make sure that you inform disabled children and adults of any necessary physical contact and ensure that they are comfortable with this;
- Endeavour to be an excellent role model for dealing with other people.

In general it is not appropriate to:

- Spend excessive time alone with children and vulnerable adults away from others;
- Take children and vulnerable adults to your home, especially where they will be alone with you;
- Do things for children and vulnerable adults of a personal nature that they can do for themselves.

Staff and others must never:

- Engage in any form of sexual activity or develop physical/sexual relationships with children (persons under the age of the age of 18) regardless of the age of consent locally. Ignorance or mistaken belief in the age of a child is not a defence².
- Engage in sexual relationships with recipients of direct or indirect aid/assistance from HHC (e.g., the parent or caregiver of children benefitting from HHC programmes) with members of the communities in which HHC works, within the workplace or within the home.
- Engage the services of sex workers, irrespective of the local or national laws or norms regarding sex work or the laws of their home country or the location in question.
- Support or take part in any form of sexually exploitative or abusive activities, including downloading or sharing indecent images or pornographic materials, the trafficking and modern slavery of human beings, or sexual or exploitative relationships with people who have been trafficked or engaged in early child and forced marriage.
- Use language or behaviour towards children and adults that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

² Definitions of “sexual exploitation” and “sexual abuse” from the UN Secretary General’s Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)

- Invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger.
- Hire children for domestic or other labour, which is inappropriate given their age or developmental stage which interferes with their time available for education and recreational activities or which places them at significant risk of injury or exploitation, including sexual exploitation, abuse and harassment.
- Use language or behaviour towards children or adults that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts/platforms, address, webcam, skype, zoom etc.)
- Use any computers, mobile phones, video cameras or social media to exploit or harass children or adults, or access child exploitative or any other indecent or inappropriate materials or internet sites.
- Fail to report any allegations, causes for concern, or suspicions of the sexual exploitation, abuse and harassment of another person.
- Fail to take corrective action to prevent and or manage risk when designing and implementing HHC programs and activities. This includes research, advocacy, fund-raising, campaigns and media related activities and events, which directly involve children and or vulnerable adults.

Expected and Acceptable Behaviour between Children

It is important that HHC promotes a culture that ensures children respect and behave well towards other children and adults. This guidance should be provided verbally and by following examples of good behaviour displayed by staff at all times. Developing positive ways of managing challenging behaviour will be helpful in this context. Children should also be involved in developing their own codes of behaviour e.g. anti-bullying.

Other guidelines for working with children can be found in;

- Annex 4: Guidelines and Code of Conduct for Visits to Programmes.
- Annex 5: Guidelines for Working with Children in Emergencies.
- Annex 6: Working with Partners.
- Annex 7: Communications Guidelines.
- Annex 8: Guidelines and Code of Conduct for meeting or working with people supported by our programmes.

Training

HHC aims to provide a safe and open environment to encourage communication and learning on safeguarding.

HHC ensures that information on safeguarding is available in the appropriate format and language to be accessible by all staff, volunteers, associates and children.

HHC staff, trustees, volunteers and associates receive training on safeguarding as part of their induction programme and thereafter through an annual refresher session.

Staff members with particular responsibilities relating to safeguarding are provided with regular professional development opportunities on safeguarding.

Partners and associates are briefed on safeguarding and their responsibilities under the policy upon engagement.

Risk Management

HHC is committed to ensuring the safety and wellbeing of children and vulnerable adults at all levels:

- For individual children and adults through the case management process, supported by a risk assessment tool, risk management guidelines and a case management checklist;
- At organisational level through an annual risk assessment of operations, programmes and project activities. Strategies to minimise risk to children and vulnerable people will be developed and incorporated into the design, delivery and evaluation of programmes, operations and activities that involve or impact upon children and vulnerable adults. The organisational safeguarding risk assessment and mitigation form can be found in Annex 11.

Children and families are informed about HHC's commitment to safeguarding and what to do if they have concerns about a child / vulnerable adult or the conduct of a member of HHC staff or associate. They are informed of the name and contact of the designated safeguarding focal person who is responsible for receiving reports of concerns.

It is important to note that HHC is a service developer and not a service provider. The long-term safety of children and vulnerable adults in the systems and services that HHC helps to develop, depends to a large extent on the work of local authorities to maintain the quality of the systems and services. For this reason, HHC invests significant time, expertise and resources into capacity building and technical support of authorities at all levels.

Modern Slavery and Human Trafficking

As set out in the UK Modern Slavery Act 2015 (the "Modern Slavery Act"), modern slavery, including human trafficking, is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. HHC has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in HHC's business or in its supply chains.

Hope and Homes for Children does not permit any of its employees, associates, partners, suppliers, sub-contractors, agents or any other individual with which it contracts, to engage in any aspect of modern slavery. As part of its contracting processes HHC may include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether

adults or children. HHC expects that its suppliers will hold their own suppliers to the same high standards.

Information Sharing

Hope and Homes for Children is committed to best practice and compliance with all relevant data protection laws including the General Data Protection Regulation, the Data Protection Act (2018) and Privacy and Electronic Communications Regulations 2003.³

HHC notes that children need particular protection when their personal data is being collected and processed because they may be less aware of the risks involved and the design of systems and processes should keep this in mind.

HHC needs need to have a lawful basis for processing a child's personal data. Consent is one possible lawful basis for processing, but it is not the only option. If you are relying on consent as your lawful basis for processing, for young children you need to get consent from whoever holds parental responsibility for the child – unless it is not in the best interests of the child to do so.

Sharing information is sometimes essential for effective safeguarding and promoting the welfare of children and young people. GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased.

Personal data should not be shared with third parties without the assurances that the appropriate safeguards are in place.

Online Safety

Hope and Homes for Children believes that online safety is an essential part of safeguarding.

HHC will, as far as possible:

- identify approaches to educate and raise awareness of online safety throughout our programs.
- enable all staff to work safely and responsibly, to role model positive behaviour online and to manage professional standards and practice when using technology.
- ensure volunteers, staff and trustees understand how to keep themselves safe online.
- ensure any online services we use and/or provide are safe and in line with our code of conduct.
- protect people's personal data and follow GDPR legislation.
- obtain permission to display any images on our website or social media accounts.
- identify clear procedures to use when responding to online safety concerns.

³ <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

- develop, where appropriate, project interventions that can influence online behaviour change, teach resilience and promote prevention, in addition to providing general guidance on online safety where possible.

Emergency Response

HHC recognises that children living in areas affected by conflict and humanitarian crises are particularly vulnerable. The implementation of humanitarian response strategies and activities must identify, mitigate and manage child safeguarding risks. This includes safer recruitment and safer programming approaches. See Annex 5: Guidelines for Working with Children in Emergencies.

Use of Images and Stories

In HHC's use of information, stories and images, our overriding principle is to maintain respect for the safety, privacy and dignity of children, families and communities. HHC will ensure ethical use of our social media platforms, websites, publications and events in ensuring that any child or vulnerable adult we come into contact with is protected.

We seek written, informed consent from all subjects – children and adults – before capturing or using any images or stories.

HHC's communications guide can be found in Annex 7 and guidelines for working with people supported by our programmes in Annex 8.

Safe Recruitment and Selection

HHC is committed to applying rigorous staff recruitment and selection processes which emphasise the importance of safeguarding. Particularly rigorous processes are required for any post that involves direct contact with children and vulnerable adults, either as a paid employee or volunteer.

Every manager who recruits and selects staff for UK-based or for UK-appointed overseas posts is accountable for ensuring the specified procedures are adhered to. For non-UK appointed posts, the senior manager in-country is accountable for developing and implementing recruitment and selection procedures which take full account of safeguarding issues and in line with HHC's UK guidelines (see Annex 2).

RESPONDING TO SAFEGUARDING CONCERNS

Importance of Raising Concerns

To ensure that HHC's commitment to safeguarding children and vulnerable adults and promoting their rights is upheld, it is mandatory that anyone connected with HHC who suspects or knows of maltreatment, both minor and major incidents, raises their concerns in line with the process identified within this policy.

The principle of 'best interest' of the child and the desire to secure the best outcomes for the child or vulnerable adult must always govern decisions regarding what action to take in response to concerns.

Responding to Disclosure

Disclosure of maltreatment may come directly from the child or vulnerable adult. In such circumstances, it is important to respond in a calm, caring and supportive manner. The victim is never to blame in situations of maltreatment and should be reassured they have done nothing wrong, either in relation to the maltreatment itself or in reporting it.

Children need to know that you are listening and taking seriously the information that they divulge and that you will respond positively to ensure their future protection. It is important to record what is said – at the time if appropriate, or as soon as possible following the disclosure. It may not be appropriate to enquire into the details of the maltreatment at this stage. It is important to listen and respond positively to the child and be supportive without asking leading questions. The child also needs information and an explanation of what will, or is likely to, happen next.

Immediately following disclosure, it is crucial that staff or others report the alleged maltreatment in line with national laws and the reporting framework described in this policy. This framework must be readily available in all HHC offices.

Reporting Process

The HHC reporting flowchart, found in Annex 9, illustrates the line of response for reporting concerns. The flowchart will be available and visible within each local office and in the UK offices. Each local flowchart will include the name and contact details of the relevant safeguarding focal person as well as details of external agencies to be contacted. It is important that the framework is followed correctly without delay and that clear action plans are formulated, implemented and monitored as a result of the process.

The HHC Safeguarding Incident Reporting Form (see Annex 10) is a key part of the reporting process and should be completed with as much information as possible by the relevant member of HHC staff whenever a concern or allegation is raised. Both the reporting framework and reporting form should be available in English and local languages. They should be readily available and all staff made aware of them. Completed incident report forms are emailed to the relevant safeguarding focal person within 24 hours, preferably within the same working day. The focal person will forward incident reports to the Head of Safeguarding and Quality, also within 24 hours.

The reporting process at HHC is at two levels:

- **Internal reporting within HHC:** It is vital that all concerns are raised immediately and discussed both locally and with the Head of Safeguarding and Quality. It may be that in some circumstances no action can or will be taken. However, the main objective is to ensure that clear outcomes result from the reporting process.
- **External reporting outside HHC:** Concerns should be referred to the relevant external agencies wherever possible and appropriate. This will normally follow internal discussion. However, if the case is of an urgent nature, a direct referral may be made in advance of the internal discussion. **This step recognises the fact that HHC does not have a statutory role in investigating safeguarding concerns, and that it may not be the agency best placed locally to respond to such matters.**

Reports of Maltreatment against HHC Personnel

Allegations of possible maltreatment may be made against individuals working within HHC or partner organisations. These may be via a third party or as a result of observations of the way an individual conducts him/herself with children or vulnerable adults.

Any report is treated seriously and with confidentiality. The priority is always the safety and best interests of the child or vulnerable adult. Identifying information about the child or vulnerable adult is shared on a 'need to know' basis.

HHC has a Whistleblowing Policy. Any staff member, volunteer or associate who raises concerns of malpractice will be protected from victimisation or any other detrimental treatment if they come forward with concerns, provided that concerns are raised in good faith. Deliberate false allegations are a serious disciplinary offence and will be handled as such.

The subject of the complaint (alleged perpetrator) and all witnesses must cooperate fully and openly with internal and statutory investigations and processes. Their confidentiality will be protected and

information that could identify them will be shared on a 'need to know' basis. A prompt and appropriate response will ensure that the situation is not dragged out and that all individuals involved are clear on issues and actions to be taken.

Serious allegations against a staff member, volunteer or associate will result in immediate suspension from employment subject to investigation of the case. If the allegation is a criminal issue, it will be reported to the authorities before taking action.

A person with the skills to do so will conduct the internal investigation. The investigation should involve interviews of all parties involved, including witnesses, to gather all relevant details of the allegation.

Internal investigations related to allegations of criminal behaviour should be discussed with the formal authorities prior to embarking on this course of action to ensure that the organisation does not compromise the formal investigation.

Appropriate disciplinary measures will be taken in the event that the allegation is found to be true. Any behaviour towards a child, children or vulnerable adult which is abusive or exploitative in nature (and which takes place either inside or outside the work environment) will be considered as gross misconduct.

If the allegation is found to be without base, appropriate steps will be taken to minimise damage to the

reputation of the individual accused. Support and counselling will be made available for those involved.

Disciplinary Appeals

A disciplinary appeals procedure is in place to ensure that all appeals are dealt with constructively, promptly and with fairness and transparency. Appeals will be afforded the same level of confidentiality as the original complaint.

ADAPTING AND COMMUNICATING THE POLICY

HHC takes a multifaceted approach to actively promote the policy to the many people involved within the organisation.

- HHC has a Head of Safeguarding and Quality who has overall responsibility for making sure the policy is implemented and followed. Each HHC country of operation has a safeguarding focal person responsible, with the national SMT, for the adaptation, implementation of and adherence to the policy in their context;
- It is the responsibility of all managers to ensure that staff and others whom they manage are made aware of the policy and the reporting procedures. This will include volunteers and partners;
- All staff members with a responsibility for safeguarding should be easily identifiable to others when at work;
- The policy is easily available to all staff members, volunteers and associates in both written and electronic forms. This also includes the incident reporting procedure;
- The policy is included as part of the induction process for all new staff members and volunteers;
- Annual updates/refreshers are given, which will provide an opportunity to inform staff of any changes to the policy or procedures and also allow time for staff to feed back on the local working of the policy and to raise any concerns they may have;
- Any changes to either the policy or procedures will be communicated directly to national and regional directors via the HHC UK office at the earliest opportunity. It will be their responsibility to inform their teams;
- Information concerning the policy, including the reporting framework, is openly displayed in all HHC offices and is also available to children in child-friendly format. This should include up-to-date contact details for local support agencies and services and information about the complaints procedure;
- This information must be available in the local language of the area. An explanation of the policy should be written in a format that is easily understood by children.

Funding and Resources

As safeguarding is such an integral part of HHC's work, sufficient funding and human resources must be secured on a recurring basis to support it.

MONITORING THE POLICY

Responsibility Framework

The Board of Trustees and the Chief Executive hold the final responsibility for the implementation of the Safeguarding Policy within HHC. The Senior Management Team (SMT) is collectively responsible for the development of policy and good practice. The Head of Safeguarding and Quality is responsible for ensuring that the Safeguarding Policy is up-to-date, understood, implemented and followed.

At national level the Safeguarding Policy is adapted and translated into local languages and country directors hold final responsibility for developing and implementing local safeguarding procedures that sit alongside the main Policy. Safeguarding Focal People within each national team are responsible for championing and monitoring the Policy and local procedures at national level.

The monitoring process includes the following:

- Annual safeguarding plans at central, regional and national levels
- Quarterly safeguarding reporting at central, regional and national levels
- Annual safeguarding self-audit and review at central, regional and national levels
- Monitoring of incidents reported as a result of implementing the policy

The monitoring process should also incorporate the views of the children for whom it is intended, as well as local communities, foster families and other stakeholders.

Policy Owner & Review

This policy is owned by the Head of Safeguarding and approved by the Board. It is reviewed every three years.

DEFINITIONS

Child: a young person who has not yet reached their 18th birthday.

Vulnerable adult: any person over the age of 18 who is associated with or benefits from our programmes / individuals working for HHC.

Child safeguarding: the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are reported to the appropriate authorities.

'Do no harm': refers to organisations' responsibility to avoid or minimise the harm they may be inadvertently doing as a result of programming.

Volunteer: a person who works for but is not paid by HHC.

Partners: Agencies or organisations with whom HHC engages for specific projects or programmes. Such partners may work either directly or indirectly with children.

Associates: Individuals, such as donors/supporters, journalists, consultants, researchers or providers of support services who may be engaged by HHC for specific purposes. It also includes guests and visitors to HHC and HHC programmes.

Chattel Slavery in which one person owns another person.

Bonded labour or debt bondage is when a person's work is the security for a debt – effectively the person is on 'a long lease' which they cannot bring to an end, and so cannot leave their 'employer'. Often the conditions of employment can be such that the labourer can't pay off their debt and is stuck for life, because of low wages, deductions for food and lodging, and high interest rates.

Serfdom which is when a person has to live and work for another on the other's land.

Other forms of forced labour such as when passports are confiscated (sometimes by unscrupulous recruitment agencies) from migrant workers to keep them in bondage, or when a worker is 'kept in captivity' as a domestic servant. If a supplier or contractor appears to impose excessively harsh working conditions, or excessively poor wages, then you should always be alive to the possibility that a form of forced labour is occurring.

Child slavery which is the transfer of a young person (under 18) to another person so that the young person can be exploited. Child labour may, in fact, be a form of child slavery, and should not be tolerated.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. The term "modern slavery" is widely defined and also includes human trafficking.

Marital and sexual slavery including forced marriage, the purchase of women for marriage, forced prostitution, or other sexual exploitation of individuals through the use or threat of force or other penalty.

ANNEX 1 MALTREATMENT

Effects of Maltreatment

The effects of maltreatment, and particularly the long-term consequences, are far reaching and can include death, recurrence of the maltreatment, permanent physical and psychological harm, educational and emotional failure and criminal or delinquent behaviour. People who have been maltreated may experience reduced self-esteem: they feel bad about themselves, usually because they feel guilty and in some way to blame for the abuse or for what happens subsequently. There may also be problems of sexualised or aggressive behaviour. The person may try to deal with the stress and anxiety through substance abuse, deliberate self-harm and other damaging types of behaviour. It is important to note that the effects of chronic child neglect are known to be as severe as for other forms of maltreatment.

Vulnerability to Maltreatment

In the course of its work, HHC comes into contact with a wide range of children and vulnerable adults, in a variety of settings. Many of these individuals are at greater risk of maltreatment than their peers as a result of the following circumstances:

- Disability;
- Ethnic and tribal affiliation
- Sexual orientation
- Religious affiliation
- Living on the street
- Living within institutional/alternative care settings and juvenile justice systems;
- Severe illness within a family unit;
- Living with families where there is alcohol and drug abuse or domestic violence;
- Loss of family members as a result of illness/violence;
- Harmful traditional practices e.g. extreme discipline measures;
- Stigma.

Local Definitions of Maltreatment

There is enormous variation in definitions, cultural understanding and responsibilities towards maltreatment within the countries in which HHC operates. Protection systems in many of these countries are weak and unsupportive of complex safeguarding issues. In acknowledgement of this there is a need for local guidelines for each country to reflect not only these differences but also the local resources available. This must be done without compromising our belief that certain practices and behaviours are abusive and unacceptable even if these practices are widely accepted locally.

Identifying Maltreatment in Children and Vulnerable Adults

Maltreatment occurs in many different settings and forms. Maltreatment may also come to light in a variety of ways. These include direct or indirect disclosure by the child or someone known to the child,

suspicious of maltreatment by those involved with the child, allegations and/or direct observations of signs displayed in the child's physical or emotional behaviour or direct witnessing of maltreatment.

The signs and indicators of maltreatment of a child or vulnerable adult may not be immediately obvious or identifiable. Concerns are not always raised over a single incident but often over a period of time and as a result of various factors.

In some cases an individual may not report maltreatment until many years after the event. This is referred to as historical abuse. In relation to HHC this would entail the actual or likely maltreatment that an adult reports as having suffered as a child or young person while in contact with HHC.

It is also important to recognise that complex factors often come into play regarding the reporting and investigating of suspected child maltreatment: in many countries children from poor and marginalised groups are over-represented in child maltreatment investigations and in numbers of children placed in out-of-home care due to alleged maltreatment. Whilst poverty is widely recognised as a risk factor in child maltreatment, there may also be an implicit bias in the choices that are made by decision-makers who encounter these families. Furthermore, poverty, discrimination and social inequalities – as well as the institutionalisation of children – can themselves be seen as inherently abusive to children.

ANNEX 2

RECRUITMENT AND SELECTION

HHC is committed to applying rigorous recruitment and selection processes which emphasise the importance of safeguarding. Particularly rigorous processes are required for any post that involves direct contact with children, either as a paid employee or volunteer.

Every manager who recruits and selects staff for UK-based or for UK-appointed overseas posts is accountable for ensuring the specified procedures are adhered to. For non-UK appointed posts, the senior manager in-country is accountable for developing and implementing recruitment and selection procedures which take full account of child protection issues and in line with HHC's UK guidelines as set out below.

Determining Level of Risk

For UK-based and UK-appointed posts, four levels have been defined, based on seniority and/or levels of contact with, or access to sensitive information about, children and vulnerable adults.

Level 1: Those with a level of seniority that directly impacts HHC's profile and reputation. This level includes Trustees and SMT.

Level 2: Those with access to and/or information about children and vulnerable adults. This level includes International Programmes Team and Brand Team.

Level 3: Those who may, through visits, have access to and/or to information about children and vulnerable adults. This level includes fundraising staff and donors participating in visits to programmes.

Level 4: Those with no contact with children and vulnerable adults and no access to personal information about them. This level includes some members of the resources team, some fundraising staff and others.

Each role profile should clearly identify whether the level of risk requires a criminal records check, and if so at what level.

A range of core recruitment and selection measures will apply to all posts, with additional safeguards being added as the level of seniority or access to children and vulnerable adults increases.

The HHC Rehabilitation of Ex-Offenders Policy outlines our approach to employing people with a criminal record and includes information on criminal records checking. For existing employees, a criminal records check will be conducted should the employee change role to one which requires this. All criminal records checks will be repeated every 3 years unless the employee has signed up to the Disclosure and Barring Service Update Service.

Volunteers will need to undergo the same level of recruitment if their role involves direct contact with and/or access to personal information about children and vulnerable adults. This applies to volunteers being appointed either in the UK or internationally.

Pre-employment Procedure

Post Vacancy Notification		
Item	Action	Applicable roles
Advertisements	A safeguarding statement will be included in external advertising for level 1 and 2 posts	Level 1 & 2 posts
Role profile and person specification	The safeguarding risk level of the role will be assessed, and where a DBS check is required, this will be outlined in the role profile. Specific responsibilities for implementing and safeguarding HHC's Safeguarding Policy to be highlighted	All
Job Pack and Supporting Statement	Job pack to include statement of commitment to HHC's safeguarding and pre-recruitment checking for level 1 and 2 posts <ul style="list-style-type: none"> Supporting information form to emphasise commitment to pre-employment checks and seek consent to DBS checks, where required 	All
Selection process	Identification and explanation of any employment gaps. For levels 1 and 2 posts: consideration of how safeguarding issues should be built into the design of the selection process and specific questions on safeguarding issues relevant to the post.	All Level 1 & 2 posts
Pre-Employment Checklist		
Offer of employment	Letters sent to successful candidates, offering employment, will include that the post is offered conditional to DBS checks	Level 1 & 2 posts
Qualifications	False information may lead to HHC withdrawing an offer or dismissal reflected in Supporting Statement and offer of employment.	All
Right to Work	HHC will comply with its legal responsibility to establish the right to work of all prospective UK-based employees. Country programmes need to comply with their national laws.	All
Visas	If the prospective employee is neither a British citizen nor a citizen of one of the EEA countries, they may need entry clearance before they can travel to the UK.	All

Disclosure and Barring Service (DBS) checks	Appropriate eligibility guidance will be followed for standard and enhanced DBS checks	Level 1, 2 and some level 3 posts
References	References will include suitability to work with children and/or to work with sensitive information about or images of children	Level 1 & 2 posts
Regarding Outcomes	The outcomes of the pre-appointment checks should be recorded in a consistent manner and stored in accordance with the Confidentiality Policy	All
Induction		
Induction	New employees will receive induction into HHC safeguarding policy and practice. Employees will confirm they have received the safeguarding induction and read, understood and will comply with the policy by signing the induction checklist. Satisfactory completion of probation is dependent on the signed checklist being returned to HR, where it will be retained as a central record.	All

ANNEX 3

ORGANSATIONAL CULTURE

Recent developments in safeguarding demonstrate that although policies and procedures are important, they are not sufficient to create safe organisations. Independent reviews of aid organisations have found that organisational culture and leadership are critical components of ensuring effective safeguarding.

HHC commits to growing a healthy organisational culture where safeguarding is embedded in everything we do and is owned by all staff across the organization. This culture, based on the HHC values of excellence, courage and integrity, will be modelled by trustees, directors and senior managers. When leaders live and breathe the values of the organisation, staff will naturally emulate this and where leaders demonstrate respect and accountability in their relationships with others, they build safer and more effective organisations. Trust is the cornerstone of a respectful relationship and HHC management will demonstrate this in their transparent decision-making processes, delegation of responsibilities and mechanisms for accountability.

HHC is also committed to

- Intentional reflection on where power lies in the organisation and how it is used, to understand better how power impacts positively or negatively on the organisational culture. The leadership approaches mentioned above address power and privilege and support diversity and inclusion.
- Ensuring that safeguarding is properly resourced in terms of people, time, materials and training and that safeguarding is properly situated within the organisation management structure so that its importance across all areas of work is recognised.
- Ensuring that strong and effective mechanisms are in place whereby children and young people's voices, assessments, complaints, and opinions are listened to and acted upon.
- Listening to staff and promoting an environment where all views and issues will be heard, looking out for early warning signs of abuse and encouraging regular constructive and open feedback.
- Ensuring visible, accessible, and safe reporting/complaints mechanisms for staff and beneficiaries with robust, rapid, and confidential follow ups to complaints and support to victims.

ANNEX 4

GUIDELINES AND CODE OF CONDUCT FOR VISITS TO PROGRAMMES

For staff managing or leading a programme visit it is your responsibility to:

- Set up a briefing session with the Head of Safeguarding and Quality (for Hope and Homes for Children UK-led visits) and with the safeguarding focal person (for country-led visits) before the visit
- Ensure that you are aware of the latest rules and regulations relating to taking pictures in the country you are visiting and that they are clearly communicated to everyone on the visit and adhered to (this information will be available from the focal person.)
- For UK-led visits, speak with the Hope and Homes for Children Content Strategist and the national safeguarding focal person in advance about the photography or filming you'd like to do on your visit. You'll need to seek appropriate permissions from children and their legal guardians, other beneficiaries, staff, local authorities and so on in good time. Seeking permission to take photos of children in state care can be complicated and time-consuming, so it might not be appropriate for all visits. Some children may not wish to be photographed, or their personal circumstances may make it inappropriate or unsafe for them to be photographed. We must respect this.
- Ensure that all people on the visit are DBS checked, when this is deemed necessary.
- Ensure that all people on the visit receive a verbal briefing on the Communications Guidelines prior to or at the start of the visit
- Ensure that all people on the visit (including Hope and Homes for Children staff) understand and sign the Communications Guidelines and Code of Conduct for Programme Visits (see pages 20-22) and that the signed copies are scanned and sent to the relevant country director and focal person, preferably before the visit commences; a copy of this will also be held centrally
- Ensure that all on the trip adhere to the Communications Guidelines and Code of Conduct throughout the visit
- Address any behaviour by visitors which contravenes the Communications Guidelines or Code of Conduct
- Content gathering needs or opportunities (films, photos, recordings, blogs or case studies) are to be shared and discussed with the brand team prior to the trip to ensure that their guidance is incorporated into public communications.
- All images and case studies can only be shared publicly, including on official or personal social media channels, if the use of such images and any personal information is in compliance with the guidance provided in this policy, and approved by one of the following: a member of the HHC senior management team, the trip leader (if with a supporter group) the relevant country director or the national safeguarding focal person. If in doubt, please seek guidance from the Brand Team.'

Personal responsibility

As representatives of Hope and Homes for Children we have the duty to be aware of our actions and surroundings especially when travelling and to ensure that we are not compromising the safety and wellbeing of children and vulnerable adults.

COMMUNICATIONS GUIDELINES FOR PROGRAMME VISITS

The safety and wellbeing of children and vulnerable adults is of the greatest importance to all of us. The child's best interest is paramount in all our actions and activities. As you prepare to visit one of our programmes we ask that you read, and agree to abide by, the following guidelines and code of conduct, which aim to ensure that our visit will be a positive experience for all concerned:

Local legislation and regulations

Please be aware that all countries where we work have measures in place to protect the safety and privacy of all children cared for in the national childcare system. These measures cover aspects ranging from general protection, to accepted use of images and the type of information which can be used to identify children.

For example, it is against the law in many countries to take pictures of children in state care - this is likely to include children living in institutions, small group homes and foster care.

Irrespective of the country and child protection system, we must ensure that children's dignity and universally recognised rights to privacy are respected. We also have to comply with general data protection regulations and best practice.

Guidelines for visitors to Hope and Homes for Children programmes regarding photographs and information

The following is a general policy for all programmes where we operate. Each country, however, may have specific laws or cultural sensitivities that you must consider. You'll be advised on this before or at the start of the visit.

Photographs

We understand that you may want to take photographs as a record of your visit. However, as an organisation dedicated to protecting and improving children's lives our first duty is to protect the rights, privacy and dignity of the children and families we work with. Therefore, please follow these guidelines during your trip:

- Positive group shots of children and adults are fine if permissions have been obtained.
- Please don't take pictures of individual children or families that Hope and Homes for Children have introduced to you;
- The person leading the visit will advise you on where permission has been obtained to take group shots. However, as a courtesy to people, please always ask permission before taking any pictures to ensure the subjects are happy with this. This includes photographs of staff members.
- Please do not take photographs of any children in an institution except under exceptional circumstances and with permission of the country director or national safeguarding focal person.
- Please don't share photos of people you meet on your visit on your personal or organisational social media accounts, in publications or at public talks or events, even if we have obtained consent (see annex 7 for consent form) for their story or image to be shared. If you would like to share images for use in talks, presentations, publications or on social media these can be obtained from Hope and Homes for Children UK. If you have

personal photos that you would like to use, you can submit these to the UK Brand Team for approval;

- Please respect any additional guidelines specific to the country or country partner.

Communication, Information and Case Studies

During your visit you may be given access, directly or indirectly, to information about beneficiaries.

- Information you receive about individual children, adults or families must be treated confidentially and written information should be returned at the end of the visit to the local Hope and Homes for Children staff member leading the visit
- Information that children or families may tell you directly must also be treated confidentially
- Before you use any information about individual children or families you have met, in talks or for publications, that information must be approved by the UK Brand Team to ensure identities are changed and privacy is respected
- Please do not give personal email addresses or phone numbers or agree to conduct individual communication by written, electronic means or by private visits with any beneficiaries you meet on your trip
- Please do not make any promises of help or support to individual beneficiaries or projects during your trip
- If you wish to bring gifts for children or families you will meet, please speak first to the country director who will distribute them on your behalf or advise you on the most appropriate way of distributing them yourself.

CODE OF CONDUCT FOR PROGRAMME VISITS

The aim of this Code of Conduct for Programme Visits is to protect children and adults to whom we owe a duty of care and to ensure that all visits are a positive experience for them. We strive to ensure that the Code of Conduct is interpreted in the best interests of the child.

The Code of Conduct is a guide on expected standards of behaviour when on a visit that we are responsible for.

The Code of Conduct is binding on all Hope and Homes for Children paid and unpaid staff and anyone acting as a representative of our organisation. It also includes all visitors, donors, freelancers or contractors and journalists.

It is important to recognise the trust placed in adults by children, and recognise the power held over children by adults. Treat this trust and this power with the highest responsibility.

As part of our Safeguarding Policy we ask all visitors to our overseas projects to sign up to the following:

1. Respect children's right to privacy. Children and families may decline to be visited and have the right to change their mind about the visit at any point. Children must not be expected to interact with visitors unless they choose to do so.
2. Maintain an appropriate relationship with children and beneficiaries. Any form of sexual relationship or activity with a child or with a beneficiary is totally unacceptable. Visitors will not be left alone with children. Use of sex workers is also strictly forbidden.
3. Use appropriate and respectful forms of communication. Physical aggression, intimidation, verbal abuse and persistent shouting are not acceptable. Any form of assault (e.g. hitting, kicking, pinching, slapping) is strictly forbidden.
4. Use appropriate language. Do not swear and never make sexual or suggestive comments to a child or beneficiary. If a child or beneficiary makes such comments, be prepared to enforce these boundaries in your response.
5. Do not discriminate against a child or beneficiary because of his or her age, gender, disability, culture, language, racial origin, religious belief or sexual identity. Conversely do not favour or give all of your attention to one particular child or beneficiary.
6. Ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts/platforms, address, webcam, skype, zoom etc.)
7. Be vigilant and aware of how actions can be misinterpreted by children, other vulnerable people or families we work with. Actions made with good intentions can seem intrusive or intimidating. Sometimes children become attracted to the adults visiting them. Adults should be aware of the impact of their actions and should sensitively address any misunderstanding.

Hope and Homes for Children - Code of Conduct Declaration

I have read the Hope and Homes for Children's Code of Conduct and Communications Guidelines and understand them to be an essential component of the Hope and Homes for Children Safeguarding Policy. I declare that I understand and agree to comply with the Code of Conduct and the Communications Guidelines

Name

Signature

Date

Authorised by

Signature

Date

Should a visitor travelling with Hope and Homes for Children refuse to accept, or agree to be bound by Hope and Homes for Children's Child Safeguarding Policy, the visit will be cancelled.

ANNEX 5

WORKING WITH CHILDREN IN EMERGENCIES

These principles apply to all aspects of the work and are based on HHC's guiding principles as well as the guidance given in the UN Convention on the Rights of the Child, the Guidelines for the Alternative Care of Children and the Inter-agency Guiding Principles on Unaccompanied and Separated Children.

- a. Prevent and respond to family separation, prioritise reunification for all unaccompanied and separated children and use family-based alternatives where possible when placements are needed.
- b. Respond to the care and protection needs of vulnerable children, families and communities in an integrated manner with government, NGOs and local communities.
- c. Review our incident reporting process to ensure that children and carers know how to, are confident of and are able to report incidents of abuse, harassment or exploitation.
- d. Ensure the local safeguarding mechanisms are able to respond to the new and developing situations keeping in mind potential new risks – e.g. influx of unvetted volunteers, experts and new staff, fluid situations, large numbers, Aid 'fatigue' as communities and local authorities become over-stretched.
- e. Keep the children at the centre of all our interventions;
 - Consulting with children even in emergency is still one of our core principles. As soon as it is possible and appropriate we will do this with all children and carers.
 - All decisions should be based on the best interests of the child without discrimination and with regard to the specific needs of the child.
 - Working with children and carers to ensure they are aware that their rights to safety and protection remain unchanged and how that will work in this time of emergency.
 - Reviewing our comms. procedures to ensure the use of images, stories and case studies respects the safety and dignity of children, carers and dependents during the emergency.
- f. Review and update our safeguarding policy accordingly to reflect all the above.

ANNEX 6

WORKING WITH PARTNERS

The key principles underlying our approach to due diligence are:

- **Substance over form:** The intention is not to exclude a potentially good partner on a 'technicality' or to encourage them to cut and paste a policy at the last minute. Therefore:
 - If specific documents as listed are not available, then agreed equivalent documentation may be acceptable
 - More important than documentation are their **actual** practices and procedures.
- **Real partnership:** We are willing to share our equivalent documents and procedures with the potential partner in the interests of real partnership and to support learning exchange.

Appropriate due diligence should also be carried out on sub-partners.

This annex sets out the information required from implementing partners as part of our due diligence process. This information should be requested, reviewed and discussed with the potential partner as part of any process to decide whether or not to enter into a partnership arrangement with an organisation.

The due diligence process is owned by the Chief Operating Officer, with functional experts (e.g. safeguarding, programmes, M&E) responsible for reviewing due diligence materials, risk assessment and recommendations in their specialist areas.

All implementation partnerships required SMT approval. To facilitate this, once due diligence has been completed, a proposal should be prepared which sets out:

- Scope of the proposed partnership
- Strategic fit
- Key due diligence findings: strengths and weaknesses of the proposed partner; any 'red flags' in terms of current practices
- Risk assessment and mitigating actions (e.g. policy / practice gaps, capacity-building required)
- Alternatives considered
- Recommendation

All implementation partnerships must be subject to a formal partnership agreement, before the commencement of the partnership. A model partnership agreement will be made available for this purpose. This will include a section where the partner commits to the same values as HHC. The partnership agreement should be signed by the Global Director of Programmes or the Chief Executive Officer.

Due diligence checklist:

Area	Documentation to be requested (or agreed equivalent)
<p>Governance: assessment of the organisation's operational status, structure, purpose and objectives</p>	<ul style="list-style-type: none"> • Articles of Incorporation, bylaws, or other organisational documents, including registration with the relevant local charity regulator • List of Board Members and Senior Management Team, including CVs • Organisation structure • Governance policies, specifically: <ul style="list-style-type: none"> • Code of conduct/ethics • Conflict of interest • Anti-bribery • Anti-money laundering • Security policy • Environmental policy • Related party listing at last financial year end • Details of any legal action, pending or resolved in the last 12 months • Evidence of tax status • Organisation risk framework and risk policy
<p>Financial: assessment of financial status, viability, and capacity to manage partnership funds.</p>	<ul style="list-style-type: none"> • Three most recent annual reports and financial statements (audited, if available) • Expenditure policies and procedures (Procurement Policy, Authority Schedule) • Overview of budgeting and financial reporting processes
<p>Activities and delivery: review of the strategy, plans and performance of the organisation</p>	<ul style="list-style-type: none"> • Brochures, reports or other materials describing the organisation and its activities. (Please list any commercial or political activities carried out) • Strategic Plan • Annual report and other documents include operating plans and organisational achievements / impact • Methodology and guidelines for monitoring progress and impact, including any monitoring and evaluation manual/guidelines, responsibilities and data sources; • Evidence of any action taken in response to identification of poor performance on existing activities.
<p>Safeguarding</p>	<ul style="list-style-type: none"> • Safeguarding / child protection policy (including image policy) • Whistleblowing policy • Serious incident policy • Training and reporting procedures for the above • Details of safeguarding / serious incidents in the last 2 years
<p>Systems & Processes</p>	<ul style="list-style-type: none"> • Summary of internal & external audit reports and findings for the last 2 years

ANNEX 7

COMMUNICATIONS GUIDELINES

In our use of images (both photographs and video and stories our overriding principle is to maintain the safety privacy and dignity of children families and communities portrayed.

In line with the BOND guidelines on images and messages⁴, Hope and Homes for Children aims to ensure that choices of images and messages will be made based on the paramount principles of

- Respect for the dignity of all the people concerned
- Belief in the equality of all people
- Acceptance of the need to promote fairness solidarity and justice accordingly in all our communications

Accordingly, in all communications, Hope and Homes for Children strives to

- Choose images and related messages based on values of respect, equality, solidarity and justice
- Truthfully represent any image or depicted situation both in its immediate and in its wider context so as to improve public understanding of the realities and complexities of development
- Avoid images and messages that potentially stereotype, sensationalise or discriminate against people, situations or places
- Use images, messages and case studies with the full understanding, participation and permission of the subjects or subjects' parents or guardians
- Ensure those whose situation is being represented have the opportunity to communicate their stories themselves
- Establish and record whether the subjects wish to be identifiable and always act accordingly
- Conform to the highest standards in relation to human rights and protection of the vulnerable people
- Conform to the highest standards in relation to children's rights according to the Convention On The Rights Of The Child (CRC) as children are the subjects most frequently portrayed

Guidelines for obtaining and storing images and stories

Consent

We must ensure informed, written consent has been obtained from any person we wish to photograph, video or interview, regardless of whether or not they are identifiable in the

⁴ <https://www.bond.org.uk/sites/default/files/resource-documents/bond-ethical-guidelines-for-collection-and-use-of-content.pdf>

image. The written consent should be acquired by the authorised members of the in-country team, prior to capturing images or filming, and contributors should be given sufficient information and time to reflect between consent being requested and pictures or interviews being taken. Children and their families or guardians must be permitted to decline consent without any pressure being put on them to change their minds, or any fear of losing our support as a result.

On rare occasions photographs/interviews may be taken with only oral consent. In this case sufficient information must be provided to the contributor before oral consent is given, and written consent must be obtained before the material is used. Contributors in this situation must be given sufficient time between the images/interviews being taken and giving written consent, and it must be made clear that they can withdraw consent if they wish.

To capture images/stories of children under the age 18, we must obtain written consent from the child's parent or legal guardian. Additional to this, although not legally required, we should always obtain a child's consent before we take their picture, film them or interview them. We should also explain how the material will be used and the permanent nature of images and stories published on the internet. Even with the parent or legal guardian's consent, we should not photograph or interview a child who does not want to be photographed, interviewed or have their image used. Consent must be genuinely voluntary and it needs to be made clear to children and their parents/guardians that they can decline or withdraw consent at any point without any negative repercussions. If possible, show children examples of how we have used stories in publications. Younger children who are able to provide informed consent should sign the consent form, as well as their parent/guardian.

In cases **where the person (or their legal guardian or representative) is illiterate or has a disability which does not permit them to provide written consent**, a fingerprint mark or a written mark with a note from another individual explaining that consent has been provided will suffice. For people who cannot understand the consent form, their chosen representative or their legal guardian should provide the consent on their behalf.

An **image taken at a public event attended by large crowds**, such as a sports or campaigning event, is regarded as having been taken in a public area and so permission is not required from everyone in the image, so long as the images are general crowd shots and not focused on any particular individuals.

People in the foreground are also considered to be in a public area, but it is recommended that photographers address those within earshot, stating where the photograph may be published and giving them the opportunity to move away. If the image of a crowd is cropped and/or focuses on one or more specific individuals in the crowd, then consent will need to be obtained from each of the subjects. This applies in the case of images taken specifically of Hope and Homes for Children beneficiaries who are attending a large event. In the case of event winners standing on a podium or similar, consent is required for individuals who are Hope and Homes for Children beneficiaries, but not for others on the podium.

Where film or photography may capture images of vulnerable people who are not associated with our work, for example in war zones or other humanitarian crises, contextual shots should follow the guidelines above for group images, and should not focus on recognisable

individuals. We always seek to focus the majority of our attention on our work within such contexts.

Consent is recorded on a **Hope and Homes for Children Image Consent Form** (see page 34) which is stored safely and securely. **The Group Consent Form** (page 35) can be used for our own or others' events where there will be a large number of people present.

Images, film footage and stories of beneficiaries should not be used more than **three years** after the date on the consent form, unless further written consent to use the material has been obtained.

Hope and Homes for Children staff members should also be given the opportunity to provide consent to use their image or information about them, and to request that their contact information is not included in any published material.

Capture key information

Capture details of the subjects photographed, videoed or interviewed. At the very minimum this should include the person's real name, where the image was taken or filmed, when it was taken, why it was taken and who took it.

Storing images and stories

Electronic copies of images and personal information about beneficiaries must be stored only in secure locations approved by Hope and Homes for Children. If hard copies are kept, they must be placed in a secure location. Where images are captured on our behalf by a contractor or freelancer, a data protection agreement specifying use, processing and storage agreements must be signed in advance, alongside a contract.

Visitors

Visitors to our programmes must comply with the guidelines in Annex 4.

Children and vulnerable adults in the care system

Children in the care system, and especially those in institutional care, are particularly vulnerable and therefore need a higher level of protection. Being institutionalised has a negative impact on their lives and this can be exacerbated by being discriminated against because of their early life in care. For this reason we don't permit any identifiable images to be taken of children in institutional care. Identifiable images of children in other out-of-home services (for example foster care, small group homes, emergency reception centres) should only be captured and used if there is a very clear case for this agreed in advance with the relevant safeguarding focal person.

Context, dress and poses

We should aim as far as possible to capture images of children and vulnerable adults in their normal environment, showing the reality of their lives, how they live and the circumstances that make them vulnerable. Where possible, we should show how we work with children, rather than show them as alone and vulnerable. Where relevant, we should include families, parents or carers.

Children and vulnerable adults should never be depicted in erotic, seductive, provocative poses or contexts. We should never ask children to pose for pictures that put them at risk, either physically or mentally.

All children and vulnerable adults represented in images must be suitably dressed to reduce the risk of inappropriate use. It is difficult to specify exactly what is appropriate given the wide diversity of clothing, however, certain images of sporting activities (swimming, gymnastics and athletics, for example) and children with little clothing on present a much greater risk of potential misuse. We should therefore never capture images of nude children, children who appear to be wearing no clothes, children without tops on or children in transparent clothes. We should also never blur nude areas or use props to cover areas that are not closed. A child's age is another factor to consider when deciding what's appropriate.

Never ask a child to advertise our brand by capturing an image of them, for example, holding up a banner of our logo. does not apply to an incidental tee shirt with our logo on it or a poster all sign that maybe in the background. Also check that any visible logo on their clothing is not in conflict with our brand or values.

Payment

Sources or subjects should not be paid or rewarded materially for information or participation.

Complaints

Any complaints or concerns about the capturing of inappropriate or intrusive images or interviews should be reported and recorded as with any other safeguarding concern.

Guidelines for feedback and sharing of images and other assets

During the course of a filming or photography visit we should let children and families see at least some of the images or footage that we have taken. After the visit, we should give them copies of the photographs, publications or films to which they have contributed, via the national teams. Research by Save the Children suggests that

“The experience of returning images as part of this research demonstrated the value of such follow ups with contributors. Follow up with and returning content and or images to contributors offers solutions to a number of the current challenges in the image making process relating to expectations, accountability, duty of care and consent. It can:

- demonstrate respect towards contributors and acknowledge the value of their contribution
- assuage any anxiety caused by uncertainty over audience and use help to manage expectations, some of which may have been created by the initial demonstration of interest shown in their lives
- at the time of image making, provide an opportunity to check contributors' well being and fulfil our duty of care towards those who contribute to our image making
- check that contributors are comfortable with how their image and story has been used and are happy to give consent for it to be used in the future (page 34)

Guidelines for publishing images and stories

Approved images and stories

Images will be considered approved once signed off by both a member of the brand team and the relevant member of the safeguarding team. Once approved, they will be made available on Brand Hub.

Only approved images and stories, with current consent, stored on the **Brand Hub** may be used for external audiences. This includes all our official and personal social media.

Use images in context

Ensure the purpose for which an image was taken and the context in which it will appear is in line with the consent. For example, a photo taken of children playing in a playground which was originally intended to publicise improvements to a Small Group Home or Community Hub could give a misleading impression about the child if used in a publication or article on domestic or child abuse.

Disclosing identity and location

Images and stories should NEVER be published or broadcast with the child's full name. We can never disclose a child's personal details, email, postal address and telephone numbers. Providing this information could seriously compromise the child's safety.

If a name is required to strengthen a news item, case story or fundraising appeal, only the agreed alias should be used (refer to BrandHub). The alias should then be used consistently throughout Hope and Homes for Children communications.

Ensure that anti location tracing features on the camera/device are switched off before images are taken.

Use of images taken on visits to programmes

Visitors to our programmes must comply with the guidelines in Annex 4 regarding use of images and stories.

Use of images produced by professional photographers

Although the copyright of images normally rests with the photographer or videographer, their use is restricted to our purposes only and for the photographer's portfolio or for his/her self-promotion when agreed. All authorised photographers must provide written consent that the material will not be shared with a third party and will only be used for our purposes via our standard data protection agreement. All photographers must provide Hope and Homes for Children with unlimited usage of images as per our standard contract.

Use of images available in the public domain

Images that are available in the public domain may only be used in our own communications if they conform to the safeguarding and ethical standards set out in this policy and must go through the same process of checking and sign-off as other images. On occasion, relevant and appropriate images and stories from credible sources in the public domain may be shared via our social media channels.

Highlight positive and transformative effect

We should endeavour to show the positive and transformative effect of our work. We always balance images/stories of institutions, or images/stories that illustrate the need, with positive images and stories, showing how we are transforming lives.

Portraying diversity

As in all our communication publications, videos and website, we should ensure there is a balanced representation of the wide range of people we work with in the context of the subject matter.

'Illustrative' images

We should avoid lending photographs to 'illustrate' articles that have little to do with the persons photographed. In the rare cases where we may need to use images unrelated to the text, it must be made clear that the images are for illustrative purposes only.

Use of captions

All images of people should be used with the correct caption, including approved alias, age, country and so on.

Misuse of images and stories

Breaches of the rules will be reported as safeguarding concerns, like any other.

Hope and Homes for Children

Consent for photographing, filming and interviewing children and adults

Dear children, young people, parents and guardians,

Hope and Homes for Children uses photographs, films and stories for fundraising and awareness-raising. **This material may be used in printed, broadcast and online publicity, on social media, in newspapers and magazines or in reports and presentations to our donors and our supporters – both in this country and internationally.**

We are dedicated to protecting and promoting children's rights. In line with our Child Protection Policy and our Image and Case Study Policy and Guidelines, we seek to ensure that all children are protected from harm a) in their experience of being interviewed, filmed or photographed and b) in the subsequent use of the images, recordings or case studies.

We are determined to carry out our work in a manner that keeps children's safety, privacy and dignity as the top priority. For this reason we commit to the following:

- ✓ We will always explain to children and young people - and their parents/guardians for children under the age of 18 – how their photos or stories will be used and ask for their written consent before we go any further
- ✓ Children and/or their parents/guardians are free to refuse consent and this will in no way affect their relationship with HHC. Even if consent is given, children and/or their parents/guardians may freely change their mind and withdraw their consent at any point
- ✓ We will always change the names of children and, if requested on this form, ensure that their faces are not visible. We will also make sure that we do not include any information that would enable people to identify and locate children
- ✓ We will not use material for more than 3 years at the most: if we want to continue to use it after that, we will come back to you and ask for your consent again. However, it is important to mention that the nature of social media (e.g. Facebook) is such that material posted will continue to be accessible in the long term

If you are happy for us to photograph, film and/or interview you and/or the child(ren) for whom you are legally responsible, then please complete the form below.

In the case of children under the age of 18 we would ask that BOTH the child (if aged 6 or older and able to give informed consent) AND the child's legal guardian (e.g. parent, carer, social worker) sign the form.

Thank you.

Hope and Homes for Children

Consent for photographing, filming and interviewing children and adults

CONSENT FORM

DATE CONSENT OBTAINED:

LOCATION:

PROGRAMME:

I/we agree to be photographed, filmed, recorded or interviewed by Hope and Homes for Children and for this material to be used for in printed, broadcast and online publicity, on social media, in newspapers and magazines or in reports and presentations to our donors and our supporters – both in this country and internationally. I/we agree to the following:

	YES	NO
Being photographed		
Being filmed		
Being recorded (voice)		
Being interviewed		
My/our face being visible		
My/our real name being used (only for subjects aged 18 or over)		
COMMENTS (e.g. more than one subject and they agree to different things)		

I have been told and understand how my story and/or images will be used. I know that I do not have to answer all of the questions and that I can decide not to continue at any time.

NAME	DATE OF BIRTH	SIGNATURE	DATE

For children under the age of 18: parent/guardian declaration

I have read and understood the above and give permission for the child(ren) named above to be photographed, filmed, taped and/or interviewed by Hope and Homes for Children.

Name:

Relationship to child:

Signature:

Hope and Homes for Children

Image Consent Form - Group Activities and Services

With your permission, we would like to take photographs and video during the course of this event, to help further the work of "Hope and Homes for Children". **This material may be used in printed, broadcast and online publicity, on social media, in newspapers and magazines or in reports and presentations to our donors and our supporters – both in this country and internationally.** In accordance with our child protection policies, we will not identify children by their real names when describing the images.

If you are happy for images of your child taken at this even to be used in this way, we would be grateful if you would sign the consent form below. If you do not wish images of your child to be used in this way, please let us know so that we can comply with your wishes. Your decision will in no way affect your child's participation in the event or access to our services. We will not use the material for more than three years without asking for your renewed consent.

I am willing for photographs and video taken at the following event to be used to further the work of Hope and Homes for Children in the ways described above:

Title of Event:

Date:

Location:

CHILD'S NAME	CONSENT? Yes/No	PARENT/GUARDIAN'S NAME (PRINTED)	PARENT/GUARDIAN'S SIGNATURE

I am willing for photographs and video taken at the following event to be used to further the work of Hope and Homes for Children in the ways described above:

ANNEX 8

GUIDELINES AND CODE OF CONDUCT FOR MEETING OR WORKING WITH PEOPLE SUPPORTED BY OUR PROGRAMMES

Guidelines for staff managing a trip, project or event which includes a visit by someone we support, for example a speaker with lived experience joining an event in a different country:

- Set up a briefing session with the Safeguarding and Quality Lead or with the safeguarding focal person (person's home country) before the trip, project or event begins
- For UK-based trips, projects or events, speak with the Hope and Homes for Children Content Strategist and Head of Safeguarding and Quality in advance about any photography or filming you'd like to do during the trip, project or event. You'll need to seek appropriate permissions from children and their legal guardians, staff and so on in good time. Some families or young people may not wish to be photographed, or their personal circumstances may make it inappropriate or unsafe for them to be photographed. We must respect this.
- Ensure that all people who will meet the person we support receive a verbal briefing on the Communications Guidelines prior to or at the start of the trip, project or event
- Ensure that all people who will meet people we support (including Hope and Homes for Children staff) understand and sign the Code of Conduct (see pages 20-22) and that the signed copies are scanned and sent to the relevant country director and focal person, preferably before the trip, project or event commences; a copy of this will also be held centrally
- Ensure that all on the trip adhere to the Code of Conduct throughout the meeting or project
- Address any behaviour by guests or partners which contravenes the Code of Conduct
- Ensure that all photos taken during the trip, project or event by guests, partners, staff, contractors or supporters are approved and signed off before use by the Brand Team and the Head of Safeguarding and Quality (or focal person for country-led visits)
- Ensure that anyone sharing their experience, live, or to create content through or with Hope and Homes for Children, has an appropriate degree of artistic control and agency in the presentation of that content.
- For example, where a film is made with an interviewee, that interviewee ideally collaborates on the questions in advance, sees and is comfortable with framing during the shoot, and approves the edit with time for meaningful feedback to be included.

Personal responsibility

As representatives of Hope and Homes for Children we have the duty to be aware of our actions and surroundings when hosting people supported by our programmes, and to ensure that we're not compromising the safety and wellbeing of children and vulnerable adults.

Guidelines for guests, supporters and collaborators

The safety and wellbeing of children and vulnerable adults is of the greatest importance to all of us. The child's best interest is paramount in all our actions and activities. As you prepare to meet someone supported by our programmes we ask that you read the following guidelines, and agree to abide by the code of conduct, which aims to ensure that your trip, project or event will be a positive experience for all concerned.

Photographs

We understand that you may want to take photographs with people you meet through your involvement with Hope and Homes for Children. However, as an organisation dedicated to protecting and improving children's lives our first duty is to protect the rights, privacy and dignity of the children and families we work with. Therefore, please follow these guidelines during the trip, project or event:

- Positive group shots of children and adults are fine if permissions have been obtained.
 - Please don't take pictures of individual children or families that Hope and Homes for Children have introduced to you;
- As a courtesy to people, please always ask permission before taking any pictures to ensure the subjects are happy with this. This includes photographs of staff members;
- Please don't take photographs in any children's institutions;
- Please don't share photos of people you meet through us on your personal or organisational social media accounts, in publications or at public talks or events. If you would like to share images for use in talks, presentations, publications or on social media these can be obtained from Hope and Homes for Children UK. If you have personal photos that you would like to use, you can submit these to the UK Brand Team for approval.

Information about people you meet

During a trip, project or event you may see or hear, directly or indirectly, information about people we work with.

- Information you receive about individual children, adults or families must be treated confidentially and written information should be returned at the end of your involvement to the Hope and Homes for Children staff member leading the trip, project or event
- Information that children or families may tell you directly must also be treated confidentially
- Before you use any information about individual children or families you have met, in talks or for publications, that information must be approved by the UK Brand Team to ensure identities are changed and privacy is respected

- Please don't give personal email addresses or phone numbers or agree to conduct individual communication by written, electronic means or by private visits with any people you meet through us
- Please don't make any promises of help or support to individuals or projects
- If you wish to give gifts to children or families you'll meet, please speak to the Hope and Homes for Children staff member leading the trip, project or event beforehand

CODE OF CONDUCT FOR MEETING WITH VISITORS FROM OUR PROGRAMMES

The aim of this Code of Conduct is to protect children and adults to whom we owe a duty of care and to ensure that all interactions with people they meet through us are a positive experience for them. We strive to ensure that the Code of Conduct is interpreted in the best interests of the child – it's a guide on expected standards of behaviour when interacting with someone supported by our programmes in any capacity.

The Code of Conduct is binding on all Hope and Homes for Children paid and unpaid staff and anyone acting as a representative of our organisation. It also includes all guests, supporters, donors, partners, freelancers or contractors and journalists.

It is important to recognise the trust placed in adults by children, and the power held over children by adults. Treat this trust and this power with the highest responsibility.

As part of our Safeguarding Policy we ask all those who will meet and work with someone supported by our programmes to sign up to the following:

1. Respect children's right to privacy. Children and families may decline to be photographed or share their personal details, and have the right to change their mind about the visit at any point. Children must not be expected to interact with you unless they choose to do so.
2. Maintain an appropriate relationship with children, vulnerable adults and families we support. Any form of sexual relationship or activity with a child or someone supported by our programmes is totally unacceptable. People supported by our programmes will not be left physically alone with those introduced to them by Hope and Homes for Children.
3. Use appropriate and respectful forms of communication. Physical aggression, intimidation, verbal abuse and persistent shouting are not acceptable. Any form of assault (e.g. hitting, kicking, pinching, slapping) is strictly forbidden.
4. Use appropriate language. Do not swear and never make sexual or suggestive comments to a child or visitor supported by our programmes. If a child or adult visitor makes such comments, be prepared to enforce these boundaries in your response.
5. Do not discriminate against a child or adult visitor supported by our programmes because of his or her age, gender, disability, culture, language, racial origin, religious belief or sexual identity. Conversely do not favour or give all of your attention to one particular child or person.
6. Do not ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts/platforms, address, webcam, skype, zoom etc.)
7. Be vigilant and aware of how actions can be misinterpreted by children, other vulnerable people or families we work with. Actions made with good intentions can seem intrusive or intimidating. Sometimes children become attracted to the adults visiting them. Adults should be aware of the impact of their actions and should sensitively address any misunderstanding.

Hope and Homes for Children Code of Conduct Declaration

I have read the Hope and Homes for Children's Code of Conduct and understand it to be an essential component of the Hope and Homes for Children Safeguarding Policy. I declare that I understand and agree to comply with the Code of Conduct.

Name

Signature

Date

Authorised by

Signature

Date

Should a guest or partner of Hope and Homes for Children refuse to accept, or agree to be bound by, Hope and Homes for Children's Child Safeguarding Policy, the trip, project or event will be cancelled.

ANNEX 9
SAFEGUARDING REPORTING FLOWCHART

Concerned about suspected, witnessed,
reported or potential maltreatment of a
child/children or vulnerable young adult
involved in HHC programmes



Report your concerns to the designated Safeguarding Focal Person in your national programme (or to the HHC Head of Safeguarding and Quality for UK-based staff), preferably on the same working day:

If your concern involves this person, or this person is temporarily unavailable, go to the next most appropriate person e.g. country director, head of department.



The designated focal person will share the report with:

- HHC Head of Safeguarding and Quality
- Your country director (or head of department for UK-based staff)

Action will be taken by the Head of Safeguarding and Quality and focal people, and country director/head of department, in consultation with the HHC Director of Programmes and CEO for serious incidents, to ensure that the child is safe as a priority and then to investigate the matter, guided by the child safeguarding policy and procedures and local laws.



Referral to local police, social
services and other agencies as
appropriate

Incident Case Management

Every safeguarding incident reported will be managed and documented using case management principles. Regular updates regarding the welfare of the victim and the process of the investigation will be documented and cases will be closed when resolved.

In responding to issues and concerns regarding possible maltreatment, staff and others must exercise vigilance in protecting information and only pass on information to those who need to be involved via the specified reporting process. Any decision to pass on information will be discussed with the child/person concerned and their views sought. Information on the process, likely sequence of events and possible outcomes should also be discussed with them. It is also important to ensure that the child continues to be informed of what is happening and has the opportunity to discuss and, where appropriate, influence the process.

Safe handling, storage and disposal must be ensured. Records must be kept securely locked in a place to which access is restricted. Information held on computer must be password protected. Managers and safeguarding focal people have a particular responsibility in maintaining the confidentiality of these records and must ensure that the records, or any information they contain, are made available only to relevant parties. The transfer of information should be done in such a way that confidentiality is maintained.

ANNEX 10
HHC SAFEGUARDING INCIDENT REPORT FORM
CONFIDENTIAL

Details of Person Reporting Concern			
Name			
Date			
Location			
Email Address			
Telephone / Mobile Number			
Position within HHC			
Relationship to child / vulnerable adult concerned (if relevant)			
Details of Referral			
Is this a direct referral?	Yes		No
If no, please give name, role and contact details of person(s) raising concern			
Details of Child / Children / Vulnerable Adult			
Name(s)			
Age or date of birth			
Address/Place of residence			
Telephone Number			
Who is responsible for the child/children/vulnerable adult			
What is their relationship to the child/children/vulnerable adult?			

Details of Concern

<p>Brief description of concerns – including dates and details of specific incidents</p>				
<p>Has the child/children/vulnerable adult been spoken to?</p>	<p>Yes</p>		<p>No</p>	
<p>If Yes, what was said?</p>				
<p>Is there evidence of physical abuse (e.g. bruising) or obvious distress?</p>	<p>Yes</p>		<p>No</p>	
<p>If Yes, please provide details</p>				
<p>Has an allegation been made about a specific person(s)</p>	<p>Yes</p>		<p>No</p>	
<p>Have any external agencies been notified in accordance with local procedures?</p>	<p>Yes</p>		<p>No</p>	
<p>If Yes, please provide contact name and details</p>				
<p>Details of any immediate actions taken e.g. medical aid</p>				
<p>Location of child/children/vulnerable adult at time of reporting</p>				

Additional information that is relevant to this incident	
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This form should be completed within 24 hours, preferably within the same working day, as the reported concern.

Please email the completed form as soon as possible to the Safeguarding and Participation Focal Person in your programme. If this is the person suspected of abuse, please email this form to the Country Director.

Declaration:

I have read, understood and agree to fully comply with all the provisions of the Hope and Homes for Children Safeguarding Policy (including annexes 1 – 11) 2022.

Signature.....