

Safeguarding

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Approved by:	Board of Trustees
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Policy Owner:	Chief Executive

1 Policy Statement

INTRAC believes that all children and adults, regardless of age, gender, disability, ethnic origin or economic status, have a right to be protected from all forms of harm, abuse, neglect and exploitation.

INTRAC, its trustees and staff (defined here as including all full time and part time paid employees, contracted consultants and volunteers) have a collective and individual duty of care to promote the health, safety and wellbeing, and to protect from harm, those involved in the activities of the charity.

This policy specifically commits INTRAC, its trustees and staff to safeguarding **children** (defined as under the age of 18) and **adults at risk** (defined as over the age of 18 and unable to protect themselves against significant harm or serious exploitation); protecting them from harm, and promoting a safe environment.

INTRAC will not tolerate the abuse of children or adults at risk in any form.

2 Linked Policies

INTRAC's policies relating to protecting staff from harm are set out in [INTRAC's Code of Conduct](#), and documented in INTRAC's Employee Handbook. This specifically refers to INTRAC's [anti-bullying and harassment procedures](#); and [equality, ethical conduct and whistleblowing principles](#).

3 INTRAC's safeguarding commitments

INTRAC will ensure that children and at risk adults involved in INTRAC organised activities are listened to, valued and respected, and are provided with a safe environment with which they can choose engage.

INTRAC trustees and staff are individually and collectively responsible for implementing this policy, promoting it as relevant in all aspects of their work, and holding themselves and others to the standards of behaviour expected in INTRAC's Code of Conduct.

It is the responsibility of all who represent INTRAC, in whatever capacity, to raise a concern or make a complaint to INTRAC about something they have experienced or witnessed.

INTRAC is committed to responding to all complaints and concerns about abuse, investigating, recording and reporting these to the relevant authorities, in line with the INTRAC's Whistleblowing Policy, and the Complaint or Concern Procedures set out below.

INTRAC reserves the right to periodically review and amend this policy, and will advise new and existing staff of any changes. INTRAC will ensure all staff have access to, and are familiar with this policy, and know their responsibilities within it.

INTRAC will not knowingly recruit staff to any role if they pose an unacceptable safeguarding risk.

INTRAC's Finance and Administration Director will be designated as "Safeguarding Officer" and will oversee the implementation of this policy, reporting periodically to the SMT and Board.

The Board will assign a Trustee a "Risk Owner" responsible for maintaining oversight of governance risks associated with safeguarding, and able to receive complaints or concerns.

4 Safeguarding Complaint or Concern Procedures

How to raise a complaint or concern

Anyone can raise a concern or make a complaint to INTRAC about something they have experienced or witnessed. This can be done verbally or in writing following INTRAC's whistleblowing procedures. Alternatively you may directly contact the Finance and Administration Director as Safeguarding Officer, or if the complaint involves the Safeguarding Officer, the complaint should be made to the Chief Executive or Trustee designated as safeguarding "Risk Owner".

INTRAC's whistleblowing principles will govern the handling of concerns or complaints raised by employees, affording them protection from reprisal where appropriate.

If an allegation is made against you, then you must inform your manager immediately. You should create a signed and dated record of the details as you know them and send a copy of this to the Finance and Administrations Director, who will initiate an investigation.

How to respond to a complaint or concern

INTRAC is committed to responding to all complaints and concerns of abuse.

What to do if you have concerns about the well-being of a child or an adult at risk

Disclosures and suspicion should always be acted upon swiftly. If there is an urgent situation, for example if a child or adult at risk is in imminent danger of abuse, then immediate protective action must be taken. The first priority is the immediate safety and welfare of that person.

Keep calm and act normally; do not say or show that you are shocked.

Do not investigate or question the person at risk or in a vulnerable situation. If a child or at risk adult reports abuse directly to you, only ask questions to get enough information to understand the complaint (e.g. 'who, what, where, when' questions, but not 'why' questions).

Never agree to keep a secret. If a person is in danger you will have to inform others.

Do not directly challenge the alleged abuser or parent/carers/others around the person at risk about your concerns.

Record all the details that support your suspicion and report this in line with internal reporting procedures.

5 INTRAC's complaints handling and disciplinary procedures

Immediate handling

When a complaint or concern has been raised, it must be referred within 24 hours to INTRAC's Safeguarding Officer. This can be done on behalf of somebody else, and may only involve a suspicion.

Where the complainant has provided contact details, an acknowledgement will be made using an appropriate means of communication as soon as possible.

Within 72 hours of receiving a complaint or concern, INTRAC's Safeguarding Officer must convene a case conference.

Complaints about INTRAC's Staff

Where the complaint or concern is levelled at a member of INTRAC's staff, disciplinary procedures as set out in INTRAC's Employee Handbook will be followed.

Confidentiality must be maintained throughout the complaints process by all staff and witnesses. Breaches of confidentiality will be treated as gross misconduct and subject to disciplinary action up to and including termination of employment.

The Safeguarding Officer must ascertain and comply with any legal, regulatory and contractual obligations to report suspected cases of abuse, including to the police or other statutory authorities for criminal investigation.

Complaints about INTRAC's Partners

If INTRAC receives a complaint about a partner organisation, INTRAC's Safeguarding Officer will advise them of the complaint and require them to respond quickly and appropriately.

If the outcome of the partner's investigations is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned.

If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner then INTRAC will consider terminating the relationship.

Concerns where INTRAC staff or partners are not involved

Where the complaint or concern does not involve INTRAC staff or partner staff, the Safeguarding Officer will take reasonable steps to ascertain who should be advised of the allegation and pass the information on to them. Where appropriate the Safeguarding Officer will also inform legal and regulatory authorities in accordance with whistle-blowing policies.

6 Safe Recruitment

In compliance with applicable laws, INTRAC is committed to preventing perpetrators of any safeguarding harm from being hired, (re)hired or (re)deployed. Managers will ensure robust recruitment screening processes (e.g. pre-screening using Criminal History Checks or similar) for all personnel, including employees, volunteers, consultants and other representatives. As part of this, all application forms, interviews and references must address Safeguarding and equality requirements and attitudes. INTRAC has signed up to the Inter-Agency Scheme For the Disclosure of Safeguarding-Related Misconduct in Recruitment Processes within the humanitarian and development sector (<https://www.schr.info/the-misconduct-disclosure-scheme>)

7 Use of Personal Data about Children and Adults at Risk

In order to protect the personal data of children and adults at risk, all personal information stored by INTRAC about children and adults at risk must be processed in accordance with INTRAC's Data Protection Policies which are based on the General Data Protection Regulation of the European Union (2018).

For research with children and adults at risk INTRAC's representatives must protect a respondent's identity; and ensure they have "informed consent" including in relation to the use of a person's image.

8 Training and induction

Proposed strengthening of this section:

INTRAC staff, consultants and trustees must receive copies of the Safeguarding policy when they join INTRAC as part of their induction, including a briefing on INTRAC's policies and values, the Code of Conduct, information about how to report concerns, and advice about where to seek further information about safeguarding and safer practices across the organisation. Anyone working directly with community members on behalf of INTRAC must receive additional guidance on how to receive complaints and handle them in a safe and confidential manner.

All INTRAC staff and representatives will receive training on Safeguarding of Children and Adults at risk commensurate with their role.

Overall responsibility for ensuring that staff receive regular training and messages about Safeguarding lies with the Chief Executive.

Definitions of Terms Used in the Safeguarding Policy

Proposal to include key elements of safeguarding

Sexual Harassment: Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Such conduct will also be considered sexual harassment when it interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. INTRAC recognises that the terms sexual abuse and exploitation represent a wide spectrum of behaviours and is not limited to the act of sexual intercourse.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This would include forced marriage and sexual slavery and also includes sexual activity with a child (any person under the age of 18),

Sexual Relationship: Includes but is not limited to staff members or related personnel having a physically intimate relationship, or an online sexually related relationship via social media, text or telephone.

“Staff” is used throughout the safeguarding policy as a collective term referring to paid employees, contracted consultants and volunteers, working on either full time or part time basis.

Safeguarding Children: Safeguarding is the process of protecting children from abuse or neglect, preventing impairment of their health and development, ensuring they are living in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

A **Child** is defined as anyone under 18 years old. The definition of a child for the purposes of safeguarding should not be confused with the legal definition of a child or age limits set out in other relevant laws. The fact that a person under the age of 18 may have reached the age of majority, age of sexual consent, voting age or such like does not alter their inherent vulnerability as a child.

Child Abuse : Different forms of harm or mistreatment of children are categorised under the broader term “child abuse”. Abuse can happen anywhere and at any time, but research shows that the perpetrators of abuse are likely to be known and trusted by the child. The most commonly defined types are:

Physical - violence towards or deliberate injury of a child;

Neglect- persistent failure to meet a child’s basic physical and psychological needs;

Sexual- using a child for sexual stimulation or gratification; and

Emotional- behaviour which attacks a child’s self-esteem.

Child Sexual Exploitation: Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Safeguarding Adults at Risk: The process of protecting adults from abuse or neglect, enabling adults to maintain control over their lives and make informed choices without coercion. It involves empowering adults at risk, consulting them before taking action unless someone lacks the capacity to make a decision, or their mental health poses a risk to their own or someone else's safety, in which case, always acting in his or her best interests.

An **Adult At Risk** is defined as:

*“any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, or unable to protect themselves due to age or illness and who may be unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation”.*¹

Since 2005, the range of adults considered to be at risk has been widened to include people encountering domestic abuse, substance misusers and asylum seekers.² An elderly person, while they may require extra support, does not necessarily meet the definition of adult at risk.

Vulnerable Adult Abuse³: Abuse can take many forms and the circumstances of the individual must always be considered. It may consist of a single act or repeated acts. The following is a list of examples of the different types of abuse which may affect an adult at risk:

Physical – includes, but is not limited to, hitting, slapping, pushing, kicking, misuse of medication, unlawful or inappropriate restraint and inappropriate physical sanctions;

Sexual – is unwanted sexual activity or behaviour that happens without consent or understanding;

Psychological – is emotional abuse which causes distress and can be verbal and non-verbal;

Financial and material – includes theft, fraud, exploitation and pressure in connection to wills, property, inheritance and financial transactions, or inciting an adult at risk to do any of these things on another individual's behalf; it may also involve the misuse or misappropriation of property, possessions and benefits of an adult at risk;

Discriminatory – includes abuse based on an individual's race, gender, disability, faith, sexual orientation, or age; and other forms of harassment, slurs or similar treatment or hate crime/incident;

Self-neglect – includes a wide range of behaviours such as neglecting to care for one's own personal hygiene or health; and

Domestic Abuse – is “any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality”⁴.

Mental Capacity: For the purposes of Safeguarding Adults, mental capacity is an individual's ability to:

- understand the implications of their situation and risk to themselves;
- take action themselves to prevent abuse;
- participate to the fullest extent possible in decision making about interventions involving them, be they life changing events or everyday matters.

¹ Department of Health and Social Care [No Secrets: Guidance on Protecting Vulnerable Adults in Care](#)

² Nottinghamshire District Councils and Borough [Definition of Child and Adult at Risk](#)

³ nidirect Government Services [Recognising Adult Abuse, Exploitation and Neglect](#)

⁴ Home Office [Guidance: Domestic Violence and Abuse](#)