

# **Safeguarding Matters: Module 4**

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## **Safeguarding: Getting Complaints Sorted**

Welcome to the fourth module of a five-part series on Safeguarding Matters. This module introduces three areas of safeguarding practice through the ongoing story of Family Health Frontiers (FHF) and an implementing partner Sure Health Africa (SHA). Both are fictional national civil society organisations dealing with real safeguarding issues.

### **Introduction**

### **Initial Information Gathering and Planning**

### **Investigation Process**

### **Internal Safeguarding Review and Lessons Learnt**

### **Summary**

# **Introduction**

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## **Welcome to Module 4**

In this module you will continue with Family Health Frontiers (FHF) on their safeguarding journey.

The module will address how safeguarding is covered in:

- Receiving a safeguarding incident report and making an initial assessment;
- Supporting the investigation process; and
- Preparing and undertaking an internal safeguarding review to learn lessons and improve practice.

**Study time: 45 - 60 minutes**

## **Learning Outcomes**

This module will help you:

- Become familiar with what information needs to be included in a safeguarding incident report;
- Recognise the importance of assessing whether an investigation is required, gathering information (where this is necessary) to make that assessment and planning the response;
- Understand the key stages involved in an investigation process;
- Know the importance of an internal safeguarding review to learn lessons and improve practice following a critical incident.

# **This module has 3 parts:**

## **Part 1 – Initial Inquiry and planning**

- Understand the essential information required for making a formal safeguarding report and learn the importance of 'need to know' for incident management.
- Understand the benefits of undertaking an initial inquiry and planning the investigation in response to an incident.
- Understand what needs to be considered during the initial inquiry and when planning the investigation.

## **Part 2 – Investigation Process**

- Observe how Family Health Frontiers (FHF) coordinates a safeguarding investigation and understand how the key stages of the investigation are implemented.
- See how safeguarding principles, including confidentiality, are applied.

## **Part 3 - Internal Review and Lessons Learnt**

- Understand the value of conducting an internal safeguarding review to identify risks and missed opportunities, to learn lessons and improve future safeguarding practice.

## Critical to Module 4

- This module is **not** investigation training and will **not** equip you to be an investigator.
- It shows a three stage investigation process to help you understand the stages involved in an investigation. In reality an investigation, the interviews and the evidence gathering, would be more in depth than is presented here for the purposes of the story.
- It demonstrates the value of using external investigators and how to involve external statutory agencies safely, for example the police.



### **Investigating abuse is a complex area.**

**Interventions need to be very carefully planned.**

Always consult with relevant managers and approved specialist advisors where necessary. This will help to maintain a survivor-centred approach and ensure safe practice.



### **To help you find an investigator, see the Safeguarding Consultants Directory**

<https://safeguardingsupporthub.org/providers>

Please note that the RSH has not conducted background/criminal record checks on the organisations or individuals featured on the hub. Users wishing to engage these organisations or individuals should conduct their own due diligence in this regard.

To help you stay connected to Modules 1 to 3, here is a reminder of the FHF team:

## The Context

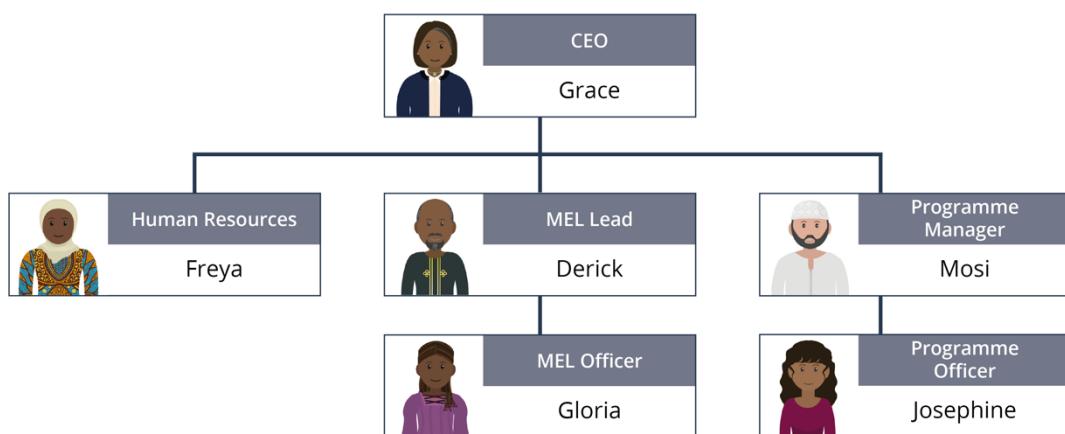
**Family Health Frontiers (FHF)** is a medium sized Civil Society Organisation (CSO), which specialises in healthcare delivery.

FHF is located in a country with significant security concerns. The country has widespread poverty and poor access to education and primary healthcare services in many rural areas. There are weak legal frameworks to protect people from Sexual Exploitation, Abuse and Sexual Harassment (SEAH). The laws that are in place are not well enforced and can be easily exploited.

**Sure Health Africa (SHA)** is a small Civil Society Organisation (CSO) that specialises in healthcare delivery to mothers and babies. SHA is located in a remote, economically disadvantaged area with weak legal frameworks to protect people from sexual exploitation and abuse. They are an implementing partner of FHF on the Infant Immunisation Programme and work from different rural community health clinics.

## The FHF Team

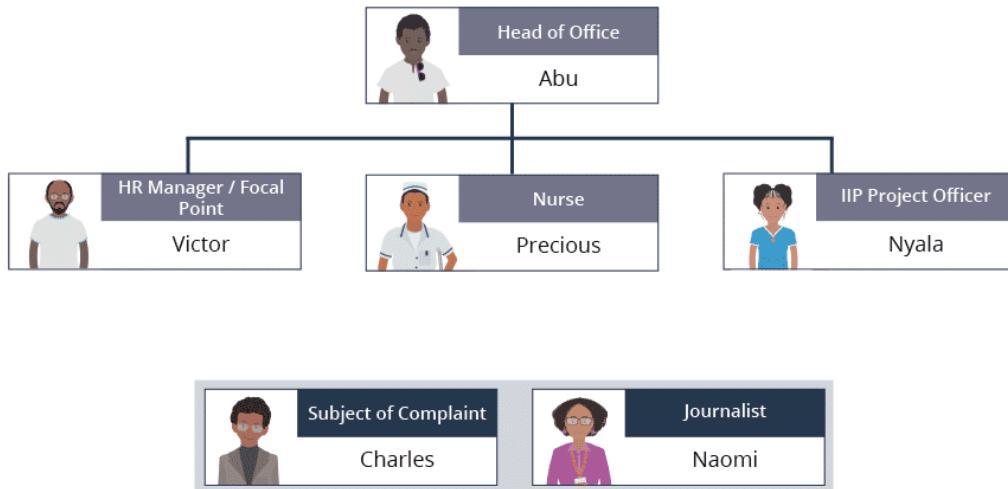
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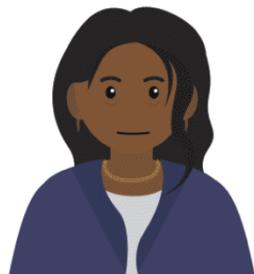
## The SHA team

To help you stay connected to Module 3, here is a reminder of the SHA team.

### Sure Health Africa



## Introduction to new characters in Module 4:



"Hi I'm Miriam. I am a safeguarding consultant. I live and work in this country. I am a trained investigator and recently have been undertaking a lot of safeguarding investigations, mostly involving children. "



"Hi I'm Cleo. I am 14 years old. I live in the village. I used to love to dance but since what happened I have been sad and not able to go to school. I am scared sometimes."

# Initial Information Gathering and Planning

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## Part 1

In the first part of the module, you will get to know the safeguarding approach that informs the initial information gathering, immediate actions and investigation planning. You will be introduced to the essential information that is required to make a formal report. You will also understand the importance of 'need to know' for incident management.

Grace, the CEO of Family Health Frontiers (FHF), convenes an Incident Planning Meeting. You will learn more about the allegation made against Reverend Charles and what to consider for the response and decision making process.

**It is the day after Precious, the nurse from Sure Health Africa (SHA), told Freya about the incident.**

Freya, the FHF HR Manager and Safeguarding Focal Point needs to formally report the allegation that Precious shared. Precious alleged that Reverend Charles sexually exploited a child whilst on his recent visit to the Infant Immunisation Programme (IIP).



## What is Freya thinking about?

Freya has a lot of worries. She knows she needs to put the allegation in writing (write a report) and is feeling overwhelmed with the responsibility. She is worried about Cleo and getting the information right.

Examine the word cloud below to better understand what Freya is thinking.

Report - what to include  
Safety Evidence SHA  
Job security Action  
Mother Victor  
Church reprisals Abu  
**Child** Retaliation  
Risk What happens next  
Repercussions IIP  
Community concern  
Reverend Charles  
**Getting it right**

### Remember

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- Faith and religious leaders play an important role in keeping communities safe.
- Sexual abuse and exploitation can, and does, happen in all communities, perpetrated by anyone, even leaders of all faiths.
- The biggest risk is to deny that anyone, including faith-based leaders, can sexually abuse or exploit a child or adult.

# Incident Management Report

Freya will need to include information described on the incident management report checklist below in her written report on the allegation.

Critical Information		Guidance
✓	Nature of the concern/allegation	Physical, sexual, emotional or neglect.
✓	Personal information known about the victim/survivor	Name, date of birth, gender etc.
✓	Contact information about the parent/carer (if relevant/known)	Name, address, contact information and if they are aware of the incident.
✓	Information about the subject(s) of the complaint	Name, role or relationship with the organisation, address, contact information etc.
✓	Incident details	Details about the reported allegation or concerns including dates, names, observations of behaviour, injuries and if known the victim/survivor account of the incident and any witness accounts of the incident.
✓	Any advice sought	Information about who else has been informed and advice given.
✓	Other organisation involvement	Which other organisations are involved with the victim/survivor? E.g. referrals to police, health centre or school etc.
✓	Action taken	Write down what you have already done, e.g. advised victim/survivor to get medical treatment etc.
✓	Declaration	Name, organisation, role, contact information, date and signature of the person filing the report.

To view the Incident Management Report checklist, click the PDF link below.

[Incident Management Report Checklist](#)

## **Top Tip**

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### **Things to Include in an Incident Report:**

When writing an incident report, it is important to include as much information as possible. Sharing information can help build a picture of what happened and inform risk assessments and decisions. All records should be factual and avoid judgement and opinion.

### **Freya sends the incident report Grace**



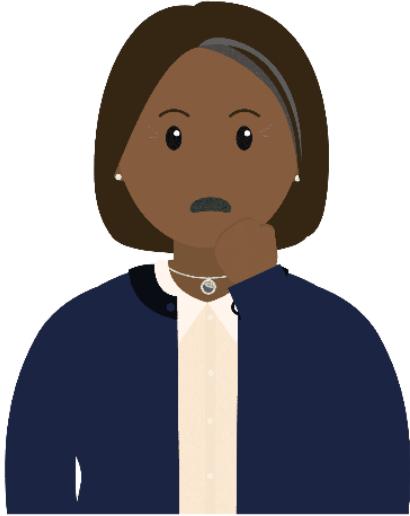
## **Freya's incident report:**

Critical Information	Guidance
Nature of the concern/allegation	Child sexual exploitation
Personal information known about the victim/survivor	Cleo, female, age 14 (Date of birth not known)
Contact information about the parent/carerer (if relevant/known)	Mother is aware, she raised the concern with Precious
Information about the subject(s) of the complaint	Reverend Charles. Private donor to Sure Health Africa (SHA)/ Infant Immunisation Programme (IIP)
Incident details	<p>Allegation that Reverend Charles sexually abused and exploited a 14-year-old child, Cleo, who he met during a VIP event that FHF and SHA co-hosted to visit the Infant Immunisation Programme (IIP). Reverend Charles attended the event with a journalist called Naomi from the local newspaper. The trip involved an overnight stay.</p> <p>As part of the event, the project hosted a reception lunch with SHA staff. Reverend Charles and Naomi were then driven to the community project to attend a clinic. They met with some doctors and nurses but also had the chance to meet children and community members.</p> <p>The child's mother attended the clinic with her baby last week and informed Precious, a SHA nurse, that Reverend Charles asked her 14-year-old daughter, Cleo, to have sex with him in exchange for money. She said that her daughter did not feel able to say no. The mother says that the abuse happened on the night of the social evening hosted by the community. At this event, some young people put on a performance of song and dance. Reverend Charles and Naomi attended this with some SHA and FHF staff including Grace, Abu and Mosi.</p> <p>Reverend Charles made a significant donation to the Infant Immunisation Programme (IIP) on behalf of his congregation shortly after the event.</p>

Any advice sought	Yes, Precious reported this to the SHA Head of Office, Abu, and HR Manager/Focal Point, Victor. They decided not to do anything further as they have no evidence that it happened
Other organisation involvement	Unknown
Action taken	Precious checked safety of Cleo with the mother, she has confirmed that she is safe at home with her. Offer of medical support provided to Cleo
Declaration	<b>Freya</b> , HR/Focal Point, 17th August 2021

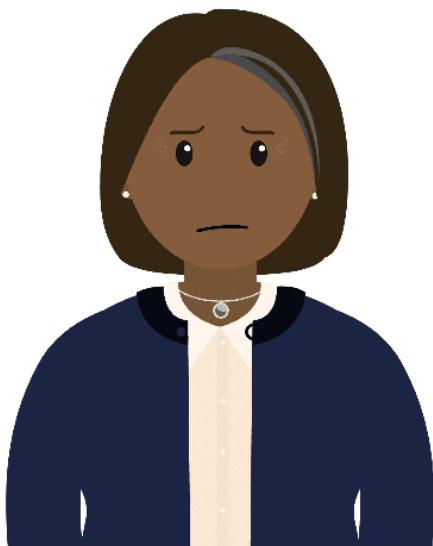
**Grace, FHF CEO asks to speak to Freya immediately.**





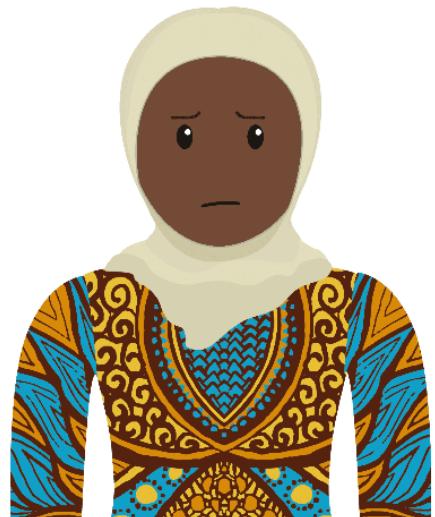
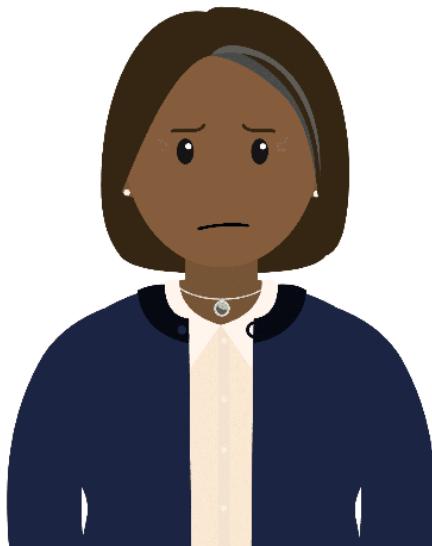
"Oh my goodness. This is terrible news. I can't believe that Reverend Charles could do this. I am a member of his church and he is such a good man and greatly respected by the community. He also recently joined our Board of Trustees, which is one of the reasons why he was invited to the event."

"I know, it is very shocking. I didn't know Reverend Charles had joined our Board of Trustees. Precious thinks the allegation is credible and has been brave enough to raise it with us directly. Precious has already reported it to Abu and Victor at SHA but they did not want to take it further, which is something we will also need to address as part of our response. Health support for the girl was offered to her mother but we should check what happened with that. We need to decide what to do next. SHA are not responding properly, so we need to do so. And of course, if Reverend Charles is our Trustee we have responsibility. I think, though, that this is a criminal issue and we need to report to the police."



"Of course. We have a duty to investigate such a serious allegation thoroughly. We can't just ignore it but we must do a risk assessment first before contacting the police. I will need to convene an incident planning meeting as soon as possible."

"Yes, I agree. Who do you want to invite to the meeting? On such a sensitive matter we need to be careful about maintaining confidentiality so I suggest we have a small group at this meeting, only involving those that 'need to know'."



"Good point. Yes, let's meet tomorrow morning. Please invite Josephine for now. She is critical as she knows the programme and I trust her."

### **Remember:**

All allegations of child abuse should normally be reported to the police. They will decide if this is a potential crime.

It is essential that organisations conduct a context mapping which identifies the services available for survivors, the legislation that applies and the details of police and other relevant government authorities. It is this information that enables organisations to support the survivor and report to the formal authorities where incidents are potentially criminal.

All reports to the police, and referrals to services, should be risk assessed and informed by the 'do no harm' principle. This is to ensure that the safety of the victim/survivor and the subject of the complaint are not compromised. This is particularly relevant where there is weak governance and poor law enforcement.

## **Top Tip: 'Need to Know' Principle and Confidentiality.**

Sharing information is vital in safeguarding but this must be balanced alongside respecting the rights of individuals to privacy. In safeguarding, confidentiality means sharing information strictly on a 'need to know' basis. People who 'need to know' should be essential to the case handling and decision-making processes. The group need relevant information to keep people safe.

Information should not be shared outside this group. Office gossip should be avoided at all costs.

## **Activity 1.1 Confidentiality**

Click on the drop down menu to match the relevant phrase in each sentence. Once you have completed all the sentences, check the answers.

**Confidentiality means...**

**Handling confidential information well also protects the...**

**Confidential information includes anything sensitive or that can be...**

**Confidentiality must apply to: the victim/survivor, their family and community; witnesses and...**

**Click here** to view the answers.

 For more information on confidentiality, see the [RSH Nigeria infographic on Consent and Confidentiality](#)

Freya schedules an incident planning meeting for the next working day. She invites Grace and Josephine. Freya knows it is not ideal that all the meeting participants are women, but she has considered the 'need to know' principle and thinks that confidentiality is more important than gender at this stage.

Freya is unsure what to include on the agenda for a safeguarding incident planning meeting. She knows that the purpose of the meeting is to share information, consider the known facts and agree a plan for next steps.

## Activity 1.2 Incident Planning Meeting Agenda

Help Freya decide what to include in the incident planning meeting agenda and to understand why. The agenda items are presented as the blue buttons. The purpose of these agenda items are in the green boxes. Select the agenda item which correlates to the correct agenda item purpose.

**...to support interview planning for the investigation, if the organisation will be conducting one, and to make sure support arrangements are in place.**

**...considerations to make sure that essential 'need to know' people and agencies are informed. This includes serious incident reporting to donors regulatory bodies.**

**...to assess any potential for leaks about the incident and to ensure the development of reactive press lines**

**...by sharing and assessing known information. This will help understanding about who is at risk and if a possible criminal offence has been committed.**

**...necessary in order to safeguard the welfare and safety of those involved. This will include early decisions on suspension and medical assistance if required.**

**...for the victim/survivor, person of concern and organisation to identify known risks and put mitigation measures in place from the earliest stage possible.**

**...that need to be taken. All decisions should be recorded with agreed responsible persons and timescales for each actions.**

**Click here** to view the answers.

## **Incident Planning Meeting**

Grace starts the meeting by explaining its purpose and the agenda. She emphasises that everything shared within the meeting stays within this 'need to know' group unless agreed otherwise. Grace then shares the detail of the safeguarding allegation as described in the report produced by Freya.



**Safeguarding Incident Planning Meeting**

**Present:**

Grace - CEO, FHF  
Freya - HR Manager & Safeguarding Focal Point, FHF  
Josephine - Programme Officer, FHF

**Agenda**

1. Establish nature and extent of concern
2. Decide immediate action
3. Conduct risk assessment
4. Witness identification
5. Information sharing
6. Media handling
7. Any other business
8. Agree next steps

## **Do No Harm Risk Assessment**

During the incident planning meeting, time was spent analysing the potential risks of next steps for Cleo, Precious, and the Infant Immunisation Programme (IIP). This included the potential risks of reporting, and not reporting, to the police.

Grace makes sure the discussion and risk assessment both apply the 'do no harm' principle. She reminds everyone that FHF has a responsibility to manage this incident by protecting individuals from harm or further harm. Grace explains that this can be done by analysing the context and making decisions that reduce unintended negative consequences.

For each key stakeholder, Grace seeks information and answers to the following questions: Who, Where, What, When and How?

**WHO** else is aware of what has been alleged?

Cleo's mother and possibly Cleo's best friend. Precious has also informed the SHA Head of Office, Abu, and HR Manager/Focal Point, Victor. They decided not to investigate the matter.

**WHERE** is Cleo now? Is she safe? Does she need any immediate assistance?

Cleo is living in her family home and attends the local village school. Her mother has confirmed that she is safe and requires no immediate assistance.

**WHAT** does Reverend Charles know, if anything, at this stage?

We have no information to suggest that Reverend Charles knows anything at this stage.

**WHAT** should be reported to the police, if anything, at this point?

Do we know whether it is safe to report to the police? Do we have contact details for the police?

**WHAT** support services are available for Cleo? What health services has she accessed?

Medical support was offered by Precious. Not known if taken up.

**WHEN** should the report to the police be made?

Do we need to get more information on the incident before reporting to the police?

**HOW** is the community likely to respond to Cleo if they find out what happened? Is there any danger of community retaliation?

Concern shared about traditional male and deep rooted attitudes towards girls and sex outside of marriage and the potential for reprisals.

The community may be angry at Reverend Charles, or sympathetic to him and angry at Cleo for making allegations against a respected religious leader.

**Top Tip:**

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Depending on the nature of the incident, there are different approaches to undertaking a risk assessment. It is important to remember that risk assessments are dynamic and should be updated regularly. For more information, see the [CHS Alliance for guidance and tools](#).

**Remember:**

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You are unlikely to get all the information in the initial report. The risk assessment may reveal additional information. Investigations are a dynamic process.

## Next Steps

The incident planning meeting concludes with several agreed actions for Grace, Freya and Josephine to progress over the coming week. The table below demonstrates some examples of decisions made:

Agreed Actions	Responsible Person	Timeline
Ask Precious to find out from the mother whether Cleo has had medical assistance or needs any other support	Freya	Within 24 hours
Research what local counselling and psychosocial support is available and provide this support for Cleo	Freya	Within 7 working days
Ask Precious if she is concerned about her safety and job security and offer protection from reprisals	Freya	Within 24 hours
Report to the police given it is a criminal offence	Freya	Within 24 hours
Do NOT inform Reverend Charles of the allegation at this stage	All	-
Do inform the Chair of the Board of Trustees that an allegation has been made against Reverend Charles and that the matter is being reported to the police	Grace	Within 24 hours
Find out more about the journalist (Naomi) who covered the event and any potential benefits or risks associated with her being a potential witness. Draft reactive press lines	Grace	Within 3 working days
Check the pre-event risk assessment and what safeguarding measures were put in place by SHA for the VIP event	Josephine	Within 3 working days
Inform the regional office and donor about the incident	Grace	Within 24 hours

## **Top Tip: External Reporting to Law Enforcement.**

As soon as there is reason to believe that the law has been broken, the organisation should be considering whether to refer to the police. Any risk this might pose to those involved, particularly the victim / survivor, should be considered.

In some countries, there is a legal obligation to report certain offences. If the decision not to report to the police is against the law, it should be agreed and signed off by senior management along with a written rationale on why the incident is not being reported to the police. If the CSO has resources to do so, it should seek external legal advice from a trusted source.

## **Freya reports to the police**

Freya is tasked to report the incident to the police. Because FHF had not already conducted a full context mapping, in order to understand who to report it to and whether it was safe to do so, Freya contacts an NGO working on child protection. That NGO provides her with contact details for the police who work on child protection cases.



Freya contacts the police and provides the report and explains who is involved in the alleged incident. She asks the police what FHF should do with regard to the Reverend Charles remaining as one of FHF Trustees.

A day later the police contact Freya to explain that they have a huge backlog of cases and it will be some time before they are able to deal with this incident. The police agree with Freya that FHF proceed with an administrative investigation because Reverend Charles is one of their Trustees. **An administrative investigation is an investigation into an alleged breach of organisational policy.** The police advise Freya on what should, or should not, be done in this investigation to avoid compromising the police investigation when that takes place. The police ask Freya to inform them of the outcome.



Freya provides Grace with details of her conversation with the police. Grace agrees that they go ahead with an administrative investigation.

Freya reminds Grace that the donor for the programme has also asked to be informed of any incidents that arise in the programme. Freya and Grace agree to let the donor have information on the incident and the action that FHF is planning to take, but identifying details will not be shared.

### **Remember: Reporting to Donors and National Regulatory Bodies**

Many donors and national regulatory bodies now require organisations to report safeguarding incidents. It is important that you find out what your reporting obligations are and report in a timely manner. Remember to keep confidential the details which identify the individuals involved.

You will need to report what has happened and how you are dealing with it. This will provide assurance that you are taking steps to limit the immediate impact of the incident and, where possible, prevent it from happening again. It will also mean that donors continue to have confidence in your organisation's safeguarding measures.

# Investigation Process

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## Part 2

In this section of the module, you will follow FHF and SHA as they coordinate and support the administrative investigation.

Investigating a safeguarding incident or complaint is a formal part of a case handling and response process.

FHF, as the lead partner, FHF must ensure the key stages of the investigations are implemented and safeguarding principles, including confidentiality, are applied.

It is essential to use a victim/survivor-centred approach which means ensuring that the survivor's wishes, safety, and well-being remain a priority in all matters and procedures.

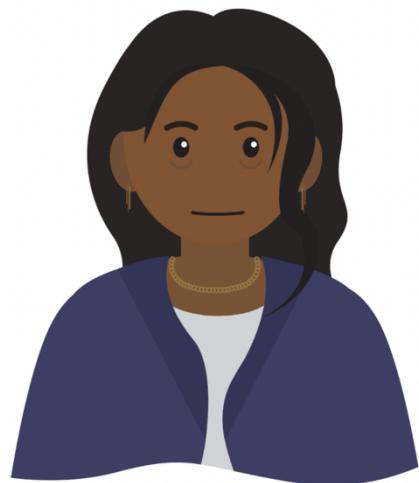


For more details on survivor-focus, see [Receiving and Responding to a report of sexual exploitation, abuse or sexual harassment in Nigeria](#).

For more details on how to support survivors, see [How to support a survivor of gender-based violence when there is no GBV actor in your area](#).

Grace and Freya decide to appoint an external investigator to conduct the investigation. They appoint Miriam who is a trained child safeguarding investigator. She also has experience and understanding of the culture and context. Ideally two people would conduct the investigation, but it has proved difficult to find two people with this level of expertise in a short timeframe.

Grace and Freya arrange an investigation planning meeting with Miriam.



At the meeting, Grace describes the Infant Immunisation Programme to Miriam. She also gives information about SHA (FHF partner) and the recent risk assessment.

Freya provides an overview of the case: the background, details of the allegation and who has been involved so far. She also shares the next steps from the incident planning meeting.

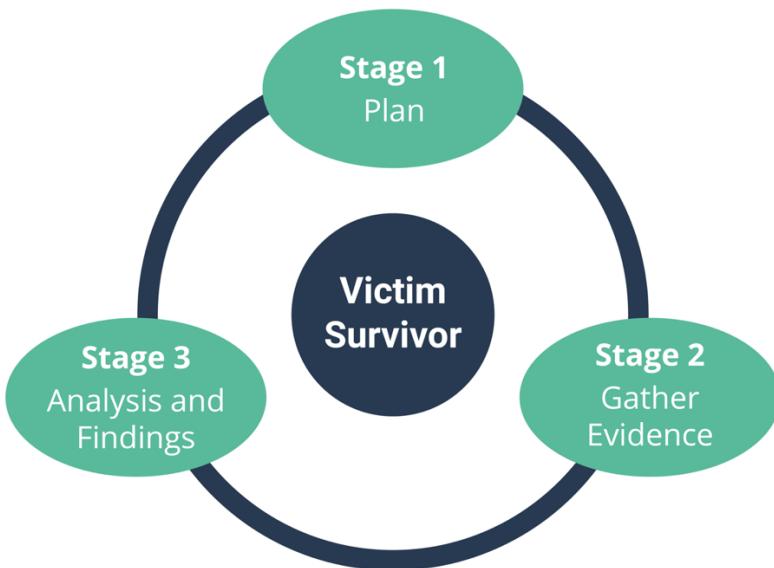
Miriam sets out the safeguarding principles that guide an investigation and explains the key stages that must be followed.



# CHS Alliance Investigation Principles for Safeguarding.

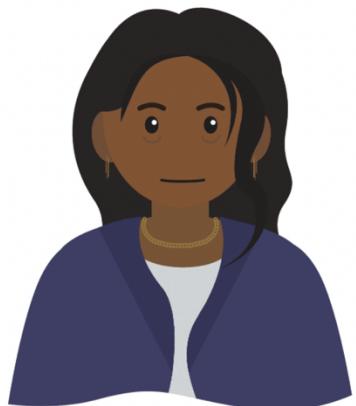
<b>Confidentiality</b>	Information is only available on a 'need to know' basis. The person who reported the incident, the alleged victim, witnesses and the alleged perpetrator have a right to confidentiality except in certain, exceptional circumstances.
<b>Health and Welfare</b>	The investigation should be survivor focused. This means that the survivor's wishes, safety, and well-being remain a priority. They should be referred for medical care, psycho-social support, counselling etc.
<b>Safety</b>	The safety of all parties is a really important consideration of an investigation. The organisation must do all it can to protect witnesses.
<b>Legality</b>	Investigations must be initiated, conducted and reported in line with all laws. If a crime appears to have been committed, consider how to inform local authorities.
<b>Professionalism</b>	Appoint trained, competent and responsible investigators.
<b>Thoroughness</b>	Investigations must be conducted in a diligent, complete and focused manner to ensure evidence is obtained.
<b>Independence</b>	Investigations must be conducted in a fair and equitable way. Investigators must be free of any influence that could impair their judgement. There must be no conflict of interest.
<b>Planning and review</b>	Investigations must be planned, systematic and completed as soon as possible. Investigation reports and reports must be supported by records and documentation.
<b>Respect</b>	Investigators must be respectful of everyone involved in the investigation.
<b>Investigate an allegation not a person</b>	The subject of the complaint must be treated with respect and investigators must be non-judgemental.
<b>Timeliness</b>	Investigations must be conducted in a timely way.
<b>Partnership</b>	Work with all relevant parties, including national authorities, taking account of legal frameworks and interagency cooperation.

(i) For more information, see [CHS Alliance Guidelines for Investigations](#).



## Investigation Stage 1: Plan

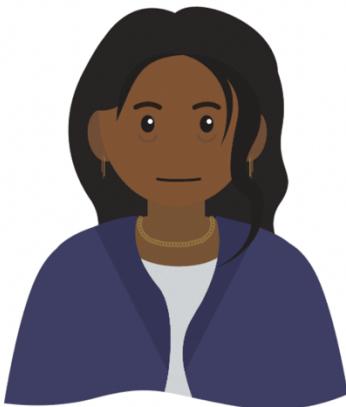
Miriam explains that the first stage of this investigation is to plan and ensure the logistics are in place to support an efficient and sensitive process:



"The interviews should take place in a confidential and neutral place. It may not be appropriate to use the office. We also need a safe space for the interview with Cleo's mother – a place where she feels comfortable."

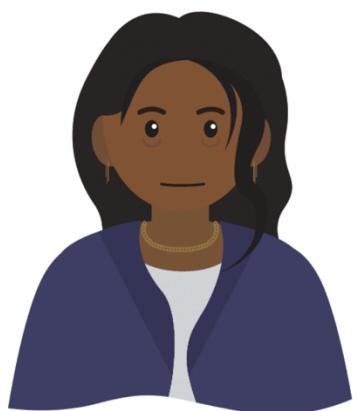
"I will set up a schedule of interviews."





"Setting out the communication processes between myself and others involved in incident planning meeting, and other key persons as necessary, will help us to move the investigation forward in a timely manner."

"I agree, and Miriam if you can let me know what other resources you need such as transport etc. we can organise that."



"I need to review all the case notes or reports that you have so far."

### **Remember:**

It is very important at all stages of an investigation to take detailed notes. Accurate case notes are critical to respect the information shared by the victim/survivor and witnesses.

It is also important to keep accurate records of all communications. Records may be requested as evidence if a case is referred to law enforcement.

These help to ensure a victim/survivor-centred approach.

Miriam is satisfied that she has gathered the critical information she needs to proceed to stage 2 of the investigation process.

Grace has agreed that Freya, as the FHF Safeguarding Focal Point, should support Miriam with practical arrangements only. As a Focal Point, it is better that Freya remain independent from the investigation itself.

## **Investigation Stage 2: Gathering Evidence**

Miriam reads all relevant documents and decides the order of her interviews to get as much information as possible.

### **Interviews**

1. Precious
2. Cleo's mother
3. Key staff involved in the event and witnesses
4. Reverend Charles

### **Documentary Evidence**

- Incident report
- Field Trip report
- Pre-event risk assessment
- Pre-event checklist documentation
- List of attendees and supporting information
- Photographs from the event
- All available information on Reverend Charles

## Investigation Interview: Precious



Miriam makes sure that Precious feels safe and comfortable to speak.

Precious shares information she received from Cleo's mother. She also says that maybe she was not taken seriously because sometimes people don't listen to her because she's a woman and has a disability.

She is worried about Cleo and her mother and the impact of this process on them. Miriam emphasises the organisation's duty of care and reassures Precious that all necessary steps will be taken to ensure the safety of Cleo and her mother. She also says that all reports of safeguarding incidents must be taken seriously, regardless of who is making the report.

### **Remember:**

Precious has reported the incident to FHF because her own organisation SHA did not respond effectively. This is known as 'whistleblowing'. She needs protection from any potential retaliation. She will also need reassurance and sensitivity. All reasonable steps should be taken to ensure her safety and protection including sensitive and transparent communication.

Organisations must have a Whistleblowing Policy and procedures for supporting everyone who speaks up and reports as part of their safeguarding responsibilities. The policy must enable people to report anonymously and must protect anyone reporting genuine concerns from retaliation.

# **Whistleblower Definition**

There is no common legal definition of what constitutes whistleblowing. The International Labour Organization (ILO) defines it as:

**"the reporting by employees or former employees of illegal, irregular, dangerous or unethical practices by employers."**

**Key characteristics common to whistleblowing include:**

1. The disclosure of wrongdoings connected to the workplace;
2. A public interest dimension, e.g., the reporting of criminal offences, unethical practices, etc., rather than a personal grievance;
3. The reporting of wrongdoings through designated channels and/or to designated persons; and
4. Disclosures are made in "good faith" and on "reasonable grounds" based on a belief that the information disclosed is true.

Source - [OECD, 2011](#) G20 Anti Corruption Action Plan. Protection of Whistleblowers: Study on Whistleblower Protection Frameworks, Compendium of Best Practices and Guiding Principles for Legislation

## Activity 2.3 Survivor-Centred Approach

Miriam prepares to interview Cleo's mother. Although Cleo's mother is not the victim/survivor, she is the victim/survivor's mother and Miriam needs to consider what she must do in order to be survivor-centred.

First of all, Miriam needs to ensure that the mother is comfortable to be interviewed as part of this process. Once she has confirmation of this, Miriam can then plan what to ask Cleo's mother.

### **Identify one area of questioning that is not survivor-centred?**

Prioritise Cleo's safety, privacy and well-being.

Ask the Mother why Cleo left the event with Reverend Charles.

Maintain Cleo's confidentiality as far as possible.

Empower Cleo's mother to tell her story bearing in mind that this may be traumatising for the mother.

To view the answer, [click here](#)

## Investigation Interview: Cleo's mother



Miriam makes sure Cleo's mother feels safe to go ahead with the interview and gives her information about the process. She is careful to use her skills and experience to avoid traumatising Cleo's mother when asking her to share her story.

Cleo's mother describes what Cleo has told her. Her mother says that Cleo had sex with Reverend Charles, but she did not want to. She could not say no.

Cleo's mother also confirmed the other information she provided to Precious.

## Investigation Interview: Witness



Miriam arranges to interview the journalist Naomi who travelled with Reverend Charles. Miriam, Grace and Freya have considered the risks associated with doing so, and Miriam has decided that she may be a potential witness and should therefore be interviewed.

Naomi is interviewed by Miriam and says that she noticed Reverend Charles was very friendly with everybody at the event.



"The Reverend spoke to lots of people, but he was especially friendly with a young girl. I saw him leaving the social evening with a girl who I think was a dancer".

**She describes the girl, who looked like Cleo.**

## Investigation Interview: Reverend Charles



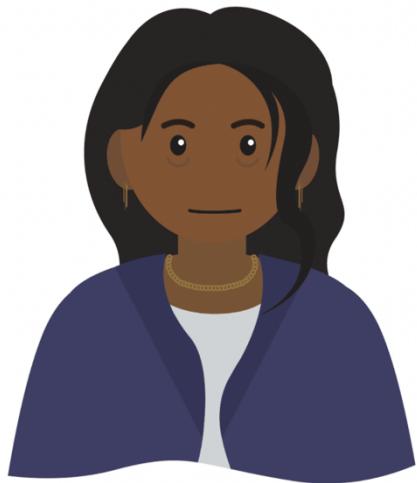
Finally, Miriam arranges to interview Reverend Charles. Miriam considers very carefully how much information to divulge to Reverend Charles in order to protect Cleo. She is also careful to approach the interview without prejudice. Miriam tells Reverend Charles that there has been an allegation of sexual misconduct and that it relates to the VIP event. She provides no more information.



"I enjoyed the event. I spoke with many people during the evening but did not behave inappropriately with anyone."

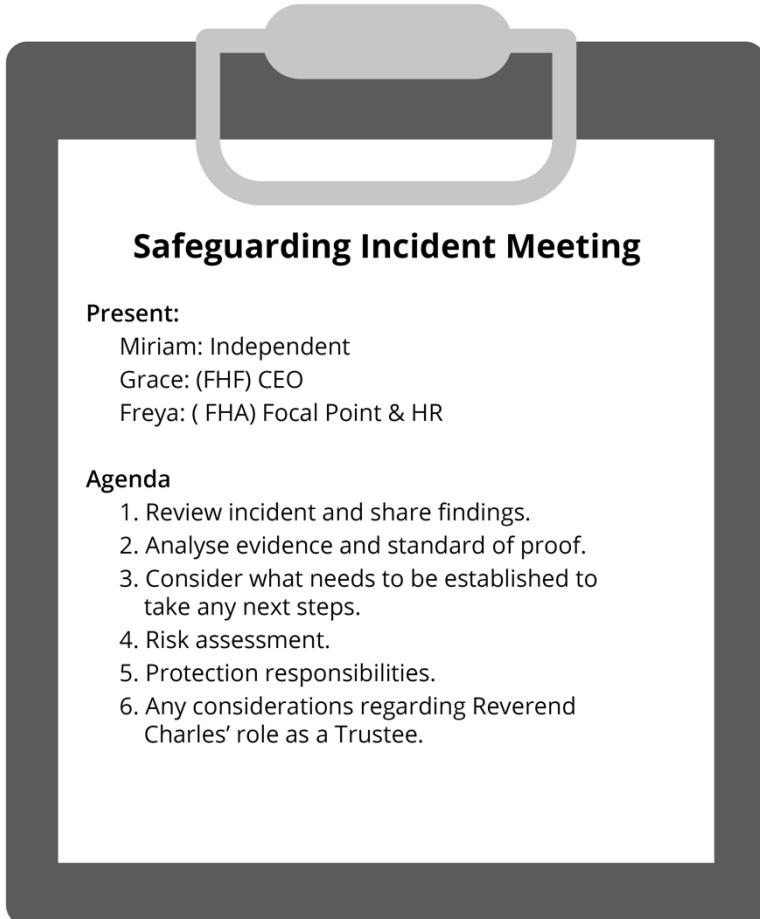
## **Next Steps for Miriam**

1. Reflect on findings.
2. Report initial findings to Freya and Grace including risk related to Reverend Charles.
3. Recommend an urgent Incident Management Meeting.



## Investigation Stage 3: Analyse Findings and Make Decisions

Freya arranges the incident management meeting. Grace prepares an agenda and identifies the need to know participants.



### Present:

Miriam: Independent  
Grace: (FHF) CEO  
Freya: ( FHA) Focal Point & HR

### Agenda

1. Review incident and share findings.
2. Analyse evidence and standard of proof.
3. Consider what needs to be established to take any next steps.
4. Risk assessment.
5. Protection responsibilities.
6. Any considerations regarding Reverend Charles' role as a Trustee.

## The Meeting Considers the Standard of Proof

In safeguarding investigations, decisions are made on the balance of probability. That means if the incident is more likely to have happened than not to have happened.

In a criminal investigation, the standards of proof must be '**beyond reasonable doubt**' and established by law enforcement and the judicial system.



## **Analysis of findings**

- Cleo's disclosure to her mother.
- Account from Precious, Cleo's mother and Naomi the journalist.
- Supporting documentation.
- Power relationships as Charles is a Trustee of FHF and a faith leader, and Cleo is a child.

Grace prepares to chair the incident management meeting.

Miriam meets with Grace beforehand to brief her and advise that the meeting must:

- Follow due process to ensure a fair hearing.
- Consider facts not judgements.
- Be alert to risks and the local context.
- Consider any protection requirements for victim/survivor and subject of complaint.
- Consider legal advice regarding next steps
- Consider if the allegation is malicious.
- Consider if a case review is necessary for lessons learnt.



## **After a full discussion, the meeting decides that:**

- Report upheld due to supporting evidence (on balance of probability), given the testimony of Cleo's mother and what was witnessed by Naomi the journalist.
- Supported by FHF, SHA will carry out a safety assessment for Cleo and her family.
- Psycho-social support will continue for Cleo.
- Support will be made available for Precious.
- The police will be contacted again with the outcomes of FHF's investigation.
- Reverend Charles will be asked to step down from his Trustee responsibilities with FHF. Grace will contact the Chair of the Board of Trustees about this.
- SHA will be informed that an investigation has taken place regarding the report that was initially made to Abu and Victor.
- An internal safeguarding review will take place as soon as possible, which will include implications for the partnership between FHF and SHA.
- IIP donor will be informed of the outcome of the investigation.

## Activity 2.4 Investigation Stages

Select the correct investigation stage correspond with the statements in the green boxes.

**The decisions of a safeguarding investigation must be based on a thorough analysis of key findings to make sure that safe and fair decisions are made. Objectivity is essential.**

**Gather evidence including reading relevant reports and case notes and conducting planned interviews. Access to information and key people is essential**

**A safeguarding investigation must be carefully planned. Key stakeholders should be briefed and kept informed of changes and developments as the investigation progresses. Planning and good communication is essential.**

To view the answer, [click here](#)

# Internal Safeguarding Review and Lessons Learnt

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## Part 3

In this section of the module, you will follow Family Health Frontiers and Sure Health Africa as they reflect and learn about the safeguarding practice and events that led up to the incident.

Conducting an internal safeguarding review is recommended good practice when a critical incident has taken place.

FHF, as the lead partner, consider their safeguarding processes and practices. By doing this, they learn important lessons about the ways in which the organisation works and how they can improve safeguarding practice and management oversight.

## Launch of Internal Safeguarding Review

Shortly after the incident management meeting, Grace meets with Miriam to discuss the internal safeguarding review. She is eager to have the opportunity to reflect on what has occurred and learn about how FHF and SHA can improve their safeguarding practice.



Miriam shares a short report she has written about management implications. This contains critical feedback about key safeguarding risks which have been identified through the investigation process and the document review. Grace decides to share the risks with her team in an internal safeguarding review meeting.

# Internal Safeguarding Review Meeting

Grace starts the meeting by emphasising that she is keen to have an open and honest discussion about safeguarding practice at FHF and within the partnership with SHA. She states that everyone has an important role and responsibility for safeguarding. Grace explains that the review will provide those involved with an important opportunity to learn and improve practice. She stresses that the aim of the review is to look openly and critically at individual and organisational practice.

Grace and Freya have informed Victor and Abu that FHF investigated the report that was initially made to them. Whilst FHF cannot divulge details, Grace asks Victor and Abu to join the internal safeguarding review meeting so that they are part of the lessons learnt for the programme and the partnership.

## Attendees

- Grace: CEO (FHF)
- Freya: HR Manager & Focal Point (FHF)
- Mosi: Programme Manager (FHF)
- Abu: Head of Office (SHA)
- Victor: HR/Focal Point (SHA)
- Josephine: Programme Officer (FHF) attending for the programming elements only

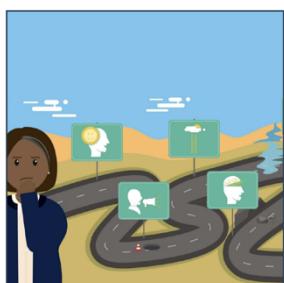


## Guiding Questions

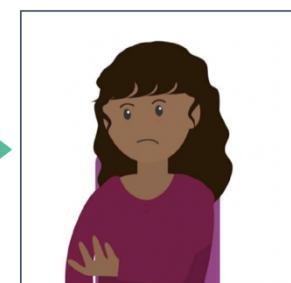
- What can be learnt from this incident about how the organisation works and how safeguarding is managed in the programme?
- Were the safeguarding systems and processes clear? Were they known and understood? Were they followed?
- Were decisions made, or actions taken, which indicate that leadership or management could be improved?
- Are there implications for ways of working, training, management and supervision?
- Are there any specific messages regarding management and oversight?

### Remember:

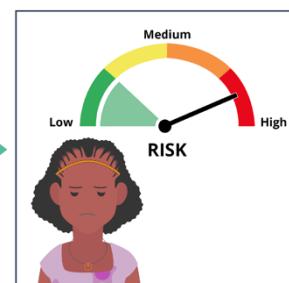
Organisational demands can put pressure on staff performance and behaviour. When there is too much demand and pressure on staff to deliver at pace, the potential for safeguarding risks to result in actual harm is significantly increased.



Organisational demands



Staff performance behaviour

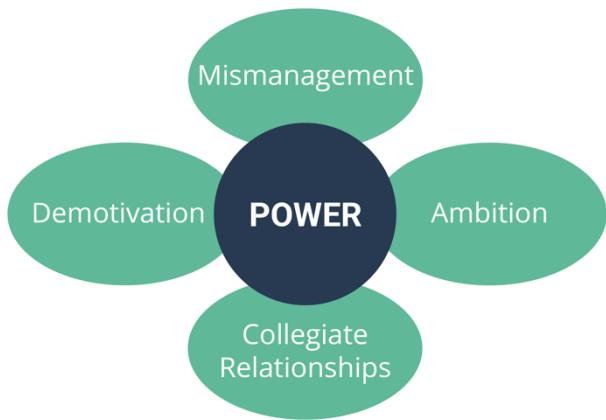


Safeguarding risks

During the meeting, Grace shares the key safeguarding risks in the table below from Miriam's management implications report. She states that it has become clear that important safeguarding processes were not in place and that impacted on safeguarding in SHA. This seems to be mainly linked to poor judgement and decision-making by senior managers in both SHA and FHF. Concerns raised by junior staff were either minimised or ignored.



<b>Project Risk Assessment</b>	Not conducted by FHF at the outset of the Infant Immunisation Programme to ensure that all risks were properly identified and addressed.
<b>Scrutiny &amp; Oversight</b>	By FHF senior managers as the lead implementing partner was insufficient.
<b>Due Diligence</b>	Was not carried out on partners including SHA. There appears to have been over reliance on FHF successfully completing the donor due diligence assessment.
<b>Self-Assessment</b>	To help identify safeguarding gaps and inform the development of a safeguarding implementation plan was not completed by SHA.
<b>Safeguarding Implementation Plan</b>	To help track progress and maintain compliance was not in place in SHA.
<b>Pre-Event Checklist</b>	Was not fully completed by SHA in preparation for the VIP event.
<b>Safer Recruitment</b>	Measures were not fully in place in SHA or FHF, including failure to require Reverend Charles to complete a self-declaration form.
<b>Training &amp; Supervision</b>	Was insufficient for safeguarding focal points, resulting in safeguarding not being prioritised by SHA.



At the internal safeguarding review meeting, FHF and SHA must consider any connection between poor practice and the circumstances reported. Grace also wants the meeting to explore the possible reasons for the poor practice identified.

**Mismanagement:** Mosi is ambitious and wants to impress Grace as the new CEO. He offered false assurance at the leadership team about SHA. He was dismissive and did not listen to Josephine and Freya when they shared critical information. Abu failed to listen to Precious when she first reported the safeguarding incident.

**Ambition and Leadership:** Grace is ambitious as a new CEO. She wants to become known nationally for leading a dynamic operation. She was hoping that Reverend Charles would donate to the project and bring some positive publicity. She also trusted him as a member of her church and a new Trustee.

**Collegiate Relationships:** Mosi was more interested in his friendship with Abu and the social opportunity at SHA. He did not use his relationship with Abu to promote safeguarding practice. This was a missed opportunity. Victor didn't want to go against Abu's judgement that the case was without foundation.

**Demotivation:** Josephine and Freya stop raising safeguarding requests for the VIP event as they had escalated their concerns and neither Mosi or Abu were happy with them doing so. They decided not to escalate to Grace, as they did not want to go over Mosi's head. Despite the potential to be demotivated because she's not always listened to, Precious went ahead and reported the incident to FHF.



## Considerations for FHF Following the Internal Safeguarding Review

Grace recognises that her poor oversight and lack of attention to her concerns about Mosi and SHA were a significant contributing factor to how things went wrong. To improve practice across FHF, she commits to the following actions:

- Work with the leadership team and Board of Trustees to build their capacity on safeguarding.
- Remind all staff and partners of their responsibility to whistleblowers and to protect victims of abuse.
- Remind everyone that the organisation will listen to their reported concerns.
- Conduct safeguarding due diligence on all new partners and ensure sufficient compliance, monitoring and support of current partners.
- Improve recruitment processes for staff and trustees so that background checks and self-declaration forms are in place.
- All safeguarding work to be actively reviewed and monitored by the leadership team and integrated into the Monitoring, Evaluation and Learnt (MEL) plan for sufficient scrutiny and oversight.
- Consider a performance management plan for Mosi to particularly focus on his workplace behaviours and management style.
- Arrange a team building day facilitated by an external specialist to motivate and improve staff morale.



## Considerations for SHA Following the Internal Safeguarding Review

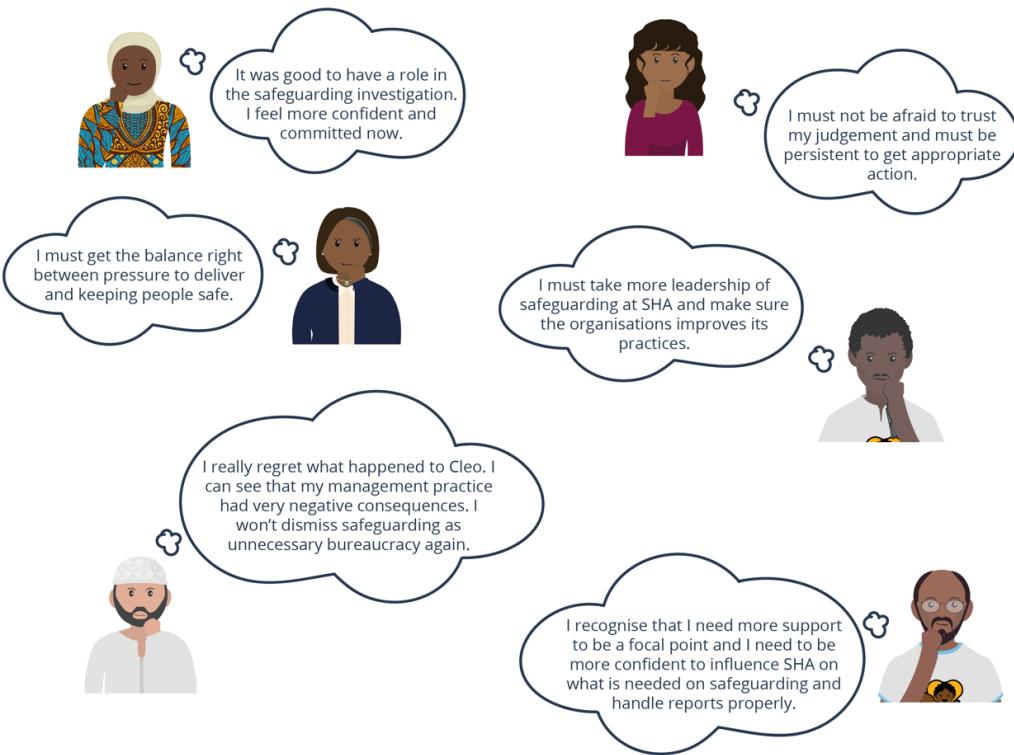
- Undertake a self-assessment to identify gaps and develop an implementation plan to improve practice.
- Undertake a safeguarding risk assessment for the Infant Immunisation Programme to determine where all potential risks have been identified and mitigated.
- Review the partnership agreement with FHF and the programme plan for the Infant Immunisation Programme to determine whether safeguarding measures are adequately reflected.
- Train all staff on safeguarding, their responsibilities to report concerns and how to receive disclosures.

## The Power of Good Practice to Protect

A robust victim/survivor approach to safeguarding keeps children and all beneficiaries at the centre and ensures their protection.



# Reflections from the Internal Safeguarding Review



1. It was good to have a role in the safeguarding investigation. I feel more confident and committed now.
2. I must not be afraid to trust my judgement and must be persistent to get appropriate action.
3. I must get the balance right between pressure to deliver and keeping people safe.
4. I must take more leadership of safeguarding at SHA and make sure the organisation improves its practices.
5. I really regret what happened to Cleo. I can see that my management practice had very negative consequences. I won't dismiss safeguarding as unnecessary bureaucracy again.
6. I recognise that I need more support to be a focal point and I need to be more confident to influence SHA on what is needed on safeguarding and handle reports properly

# Summary

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## What have you learned?

- The importance of planning for how to manage a safeguarding incident.
- The importance of initial information gathering and assessing immediate next steps.
- The key stages of an investigation process with a victim/survivor centred approach.
- The value of an internal safeguarding review to learn lessons and commit to continuous improvement.



### Points to consider to help you prepare for the next module.

Following the Internal Safeguarding Review, Grace meets with Derick and Gloria from the Monitoring, Evaluation and Learning (MEL) team to ensure MEL processes reflect critical safeguarding learning.

- How do you think lessons learnt from the internal case review will be reflected in the MEL processes?
- What changes do you think will take place in SHA to improve partner compliance with FHF'S safeguarding procedures?
- How do you think these changes can best be monitored?



## **Congratulations on completing Safeguarding Matters Module 4: Getting Complaints Sorted**

We hope that you have enjoyed accompanying FHF on the start of their safeguarding journey.

We look forward to you joining Module 5. This is the final module and following the response to the safeguarding incident in this module, Family Health Frontiers want safeguarding to be integrated into all the programme monitoring, evaluation and learning (MEL) activities.

You can access the RSH newsletter, safeguarding resources, webinars, podcasts, and much more at the [Resource and Support Hub](#).

Next, complete your Module 4 assessment to gain your personal RSH certificate of achievement.



**RESOURCE  
& SUPPORT  
HUB**



# Answer Sheet

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## Activity 1.1 Confidentiality

**Confidentiality means keeping information private** ... to respect the people involved and to avoid potential harm.

**Handling confidential information well also protects the reputation of the organisation**

**Confidential information includes anything sensitive or that can be used to identify a person** e.g. name, specific location and details of an incident.

**Confidentially must apply to: the victim/survivor, their family and community; witnesses and the alleged perpetrator.**

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**Click here** to go back to Activity 1.1

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## Activity 1.2 Incident Planning Meeting Agenda

- ✓ **Establish nature and extent of the concern** by sharing and assessing known information. This will help understanding about who is at risk and if a possible criminal offence has been committed.
- ✓ **Decide immediate action** necessary in order to safeguard the welfare and safety of those involved. This will include early decisions on suspension and medical assistance if required.
- ✓ **Conduct risk assessment** for the victim/survivor, person of concern and organisation to identify known risks and put mitigation measures in place from the earliest stage possible.
- ✓ **Witness identification** to support interview planning for the investigation, if the organisation will be conducting one, and to make sure support arrangements are in place.
- ✓ **Information sharing** considerations to make sure that essential 'need to know' people and agencies are informed. This includes serious incident reporting to donors and regulatory bodies.
- ✓ **Media handling** to assess any potential for leaks about the incident and to ensure the development of reactive press lines.
- ✓ **Agree next steps** that need to be taken. All decisions should be recorded with agreed responsible persons and timescales for each action.

**Click here** to go back to Activity 1.2

# Answer Sheet

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## Activity 2.3 Survivor-Centred Approach

- ✓ Ask the Mother why Cleo left the event with Reverend Charles.

**[Click here](#)** to go back to Activity 2.3

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## Activity 2.4 Investigation Stages

- ✓ Investigation stage 3
- ✓ Investigation stage 2
- ✓ Investigation stage 1

**[Click here](#)** to go back to Activity 2.4

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## Incident Management Report Checklist

	Critical Information	Guidance
	Nature of the concern/allegation	Physical, sexual, emotional or neglect
	Personal information known about the victim/survivor	Name, date of birth, gender etc.
	Contact information about the parent/carer (if relevant/known)	Name, address, contact information and if they are aware of the incident
	Information about the subject (s) of the complaint	Name, role or relationship with the organisation, address, contact information etc.
	Incident details	Detail about the reported allegation or concerns including dates, names, observations of behaviour, injuries and if known the victim/survivor account of the incident and any witness accounts of the incident
	Any advice sought	Information about who else has been informed and advice given
	Other organisation involvement	Which other organisations are involved with the victim/survivor? E.g. referrals to police, health centre or school etc.

	Action taken	Write down what you have already done, e.g. advised victim/survivor to get medical treatment etc.
	Declaration	Name, organisation, role, contact information, date and signature of the person filing the report

**[Click here](#) to go back to Part 1**