

# Safeguarding Policy

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# 1. Introduction

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Sightsavers is an international development organisation committed to supporting the development of health systems in low and middle-income countries and to advancing the rights and improving the quality of life of people with disabilities. Our programmes include health, education and social inclusion interventions in more than 30 countries worldwide. Many of those benefitting are adults at risk<sup>1</sup>, children and young people. We do not implement projects primarily on our own but work with a range of partners including government, civil society actors and the private sector. It is primarily our partners who work directly with adults at risk and children.

This Safeguarding Policy replaces the existing Child Protection Policy 2006. It provides clear definitions, sets standards across the organisation, and gives clear guidance on how to apply and implement the policy throughout the organisation and in relation to partner organisations.

## What is safeguarding?

Safeguarding means promoting and protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means identifying and minimising the risk of harm to children and adults from staff, representatives and partners; our operations and programme activities including and includes responding appropriately to any safeguarding concerns about children and adults within communities where we work. It entails a wide potential range of policies, procedures and activities seeking to address child and adult safety and wellbeing.

In Sightsavers' case, a safeguarding approach means minimising the risk of harm, exploitation or abuse of children and adults from staff, operations and programme activities. It includes reporting any safeguarding concerns about a child or adult within communities where we work to the appropriate authorities. This policy focuses on addressing those risks by developing standards and mitigating measures to target and reduce residual risk.

Following the widespread and serious allegations of sexual exploitation and abuse by aid workers in West Africa at the turn of the millennium, the UN Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse was issued in 2003. It has been applied by all major humanitarian agencies and integrated into their policies and procedures.

Subsequently the "do no harm" principle is now widely recognised as an important element in the wider strengthening of safeguarding systems at both national and local level when providing health, education and social protection services.

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<sup>1</sup> An adult at risk (Care Act 2014) is someone aged 18 or over who has care and support needs due to their age or frailty, gender, mental or physical health problems, learning or physical disabilities or the impact of disasters and conflicts, who is as a result unable to protect themselves from harm, exploitation or abuse.

It is known that children and adults with disabilities are at particular risk of harm, exploitation and abuse. This policy recognises that these specific risks are best addressed through a broader (twin-track) safeguarding approach with specific actions focused on children and adults with disabilities where relevant.

## 2. Target groups of the policy

The Safeguarding Policy is to be applied across all organisational activities and in all of Sightsavers' programme themes, including health, education, social inclusion and research. All Sightsavers' representatives and partner organisations<sup>2</sup> should be aware of and adhere to the policy. Sightsavers' representatives are defined as trustees, employees (permanent or temporary), consultants, volunteers who work directly for Sightsavers and donors travelling on Sightsavers business.

In addition to complying with the policy all representatives must sign and will be held accountable to Sightsavers' Safeguarding Code of Conduct<sup>3</sup>.

First and foremost, it is expected that partners will have policies and procedures in place covering safeguarding in order for Sightsavers to enter into partnership. This will not always be the case at the start of a partnership, particularly with grassroots civil society partners. Where partners do not have appropriate policies, but it is deemed essential that Sightsavers work with them, policies will be developed as part of the early stages of the partnership, led by the due diligence process.

It is recognised that, for government partners in particular, national policy and legal frameworks take precedence. However, where the national legal framework is considered weaker than Sightsavers policy, it may be a specific national advocacy activity to strengthen that framework, particularly with regards to provision for children and adults with disabilities.

Sightsavers is unable to enforce the policy with independent, external agencies, such as partner organisations. However we can choose not to work with partners, put specific conditions into partnership agreements, or end partnerships based on partners' policies and their implementation of these, including safeguarding.

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<sup>2</sup> Partner organisations here are defined as those included within Sightsavers' Partnership Policy

<sup>3</sup> See Sightsavers Code of Conduct for Representatives, included as Annex 3

### 3. Purpose and commitment

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The purpose of this policy is to ensure that Sightsavers activities are implemented in a safe and protective environment where harm, exploitation and abuse are effectively prevented as far as reasonably possible, and responded to effectively.

The policy has three specific objectives:

- 1) Keeping children and adults safe
- 2) Safeguarding the reputation of Sightsavers, including guarding Sightsavers' representatives from false allegations or from operating within an unclear framework
- 3) Ensuring the highest standards of behaviour from representatives and minimising the risk of abusers entering the organisation.

Sightsavers is committed to doing whatever we can to keep everyone safe, with a specific focus on those with disabilities. Sightsavers' work is guided by:

- the UN Convention on the Rights of the Child (CRC), with specific reference to article 19 on protection from all forms of violence, injury, exploitation, abuse, neglect, mistreatment and sexual abuse; and
- the UN Convention on the Rights of Persons with Disabilities (CRPD) including its special provisions for the protection of children with disabilities from cruel, inhuman or degrading treatment or punishment (article 15) and exploitation and abuse, including gender-based violence (article 16).
- the recognition of the rights of children and adults with disabilities to access services, justice, and full participation in their communities, in line with the CRPD. This means that effective safeguarding from the additional risks faced by those with disabilities must not include preventing them from accessing these rights.

In all activities involving children, including fundraising, communications and programme activities, primary consideration should be given to children's rights, following the four key principles of the CRC, namely, the "best interest" of the child, the child's right to life and development, the child's right to be heard/participate, and the child's right to non-discrimination.

#### Principles of safeguarding

Sightsavers is committed to the six key principles that should underpin all safeguarding functions, actions and decisions, as set out by the UK Care Act 2014. These principles are relevant for both child and adult safeguarding.

- 1) **Empowerment.** People being supported and encouraged to make their own decisions and informed consent.
- 2) **Prevention.** It is better to take action before harm occurs.
- 3) **Proportionality.** The least intrusive response appropriate to the risk presented.
- 4) **Protection.** Support and representation for those in greatest need.

- 5) **Partnership.** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- 6) **Accountability.** Accountability and transparency in delivering safeguarding.

## Children and adults with disabilities

Sightsavers has a specific mandate to protect and promote the rights of people with visual impairment, and is increasingly involved in direct support to other people with disabilities.

Recent research on child protection and disability<sup>4</sup> has found that children with disabilities experience far higher levels of abuse than their peers. Girls and boys with different impairments are vulnerable to many forms of abuse but most at risk are children with intellectual impairment and communication difficulties. Emotional and sexual abuse are mostly reported by girls with disabilities, but boys with disabilities are also targeted.

Negative cultural norms around disability contribute to putting people with disabilities at risk of violence and abuse, including factors such as stereotyping, prejudice, discrimination, isolation, difficulty in protecting oneself or inadequately understanding and/or communicating that abuse has occurred. People with visual impairments are especially vulnerable as they are dependent on tactile guidance. They are also likely to be particularly vulnerable in care situations, where they require assistance with toileting, dressing, bathing etc.

Sightsavers will work with its programme partners to make sure that the particular risks of harm, exploitation or abuse facing people with disabilities will be properly assessed, addressed and monitored within the local context where Sightsavers' partners operate.

Sightsavers commits to communicating this policy throughout the organisation, to partners and, where relevant, to children themselves, their parents and other beneficiaries in programme activities; as part of a broader programme to challenge stereotypes and cultural norms around disability, particularly with regards to children's potential and rights.

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<sup>4</sup> Plan International 2016 "Protect Us"- inclusion of children with disabilities in child protection

## 4. Standards

Standard and aim	Specific areas of activity / indicators	Owner
<p><u>Awareness and communication:</u> All Sightsavers representatives are aware of the policy and the organisation communicates its approach to key stakeholders</p>	<p>1.1 All Sightsavers representatives are responsible for complying with the policy and code of conduct, including following all reporting and response procedures outlined.</p> <p>1.2 Sightsavers representatives<sup>5</sup> will be introduced to the policy and sign the code of conduct as part of their induction, contracting or ongoing management process.</p> <p>1.3 All partner organisations must receive a copy of the policy and code of conduct as part of the development of any Memorandum of Understanding (MoU) or Project Funding Agreement process (PFA).</p> <p>1.4 Sightsavers will communicate the policy through its website and directly to core stakeholders<sup>6</sup>, to demonstrate its commitment and the importance of the policy</p> <p>1.5 In particular, Sightsavers will communicate about and where available share research of safeguarding issues specifically in relation to those with disabilities</p>	
<p><u>Working in partnership to safeguard children and adults:</u> All Sightsavers partners will have policies and procedures in place covering safeguarding</p>	<p>2.1 Sightsavers will only enter into an MoU or PFA with organisations that either have these in place, or are committed to developing them, based on Sightsavers' policy, as an integral part of the partnership and where specifically mentioned within the PFA. This will be assessed during the due diligence process.</p> <p>2.2 Where a partner's policies and procedures are less strong than Sightsavers, and where they do not address issues of those with disabilities specifically, consideration will be paid to advocating for and providing technical support to strengthening of the policy.</p> <p>2.3 Assessment of risks to children and adults are included as a specific part of the project development or inception phase of every project, using the approved toolkit.</p>	

<sup>5</sup> Sightsavers' employees, permanent and temporary, consultants and volunteers employed by Sightsavers

<sup>6</sup> To include, but not limited to: DFID, Irish Aid, European Commission, World Bank, Gates Foundation, USAID, WHO, select INGO partners (Fred Hollows Foundation, International Disability Alliance, ADD International etc), Comic Relief, Big Lottery Fund, selected major donors, Merck, Pfizer, Unilever, Standard Chartered Bank.

Standard and aim	Specific areas of activity / indicators	Owner
<p><u>Putting the policy into context:</u> All Sightsavers countries apply and implement the policy</p>	<p>3.1 Each office location has a Safeguarding Focal Person (SFP) in place with clear responsibilities for coordinating the implementation of the policy as well as mapping the local / external context (including legislation) for safeguarding.</p> <p>3.2 Each country has in place a safeguarding reference group which develops and reviews annually the country safeguarding plan based on this policy, outlines the members of the reference group, contact details for the SFP, any specific contextual adaptations to the policy (agreed with the Safeguarding Manager) and any advocacy, training and awareness plans.</p> <p>3.3 The plan will specifically include a communications plan including how it will be rolled out with partners, children, parents, communities.</p> <p>3.4 Each SFP will work with the Safeguarding Manager (SM) and reference group to assess any contextual issues with the policy and develop country specific procedures if relevant. These will include guidance for Sightsavers representatives about appropriate official reporting procedures in the case of an incident.</p> <p>3.5 Country procedures will be reviewed each time the global policy is reviewed, instigated by the SM, or a specific incident occurs or the national legislative environment changes, instigated by the SFP.</p>	
<p><u>Putting the policy into practice I:</u> Recruitment, selection and training</p>	<p>4.1 Sightsavers will ensure safeguarding is part of any relevant job description. This will include all positions reporting into the CEO, as well as specific positions where employees will be expected to come into direct contact with children and/or adults at risk.</p> <p>4.2 Recruitment processes for these employees will include relevant questions on experience working with children and/or adults at risk, and additional references or background checks will be undertaken for posts identified as high risk.</p> <p>4.3 Sightsavers will provide necessary training and support to representatives to ensure effective implementation of the policy.</p> <p>4.4 Sightsavers will ensure that the SM and the SFP have the capacity and capability to fulfil their roles. We will do this through training, support and the revision of roles and responsibilities.</p>	



Standard and aim	Specific areas of activity / indicators	Owner
<u>Putting the policy into practice II:</u> Programme activities	<p>5.1 Specific programme guidance will be developed for each thematic area: inclusive education; social inclusion; eye health and NTDs, by the relevant Global Technical Lead (GTL) or Technical Advisor, working with the SM. This should be developed in consultation with children and adults or their representative organisations to ensure it is robust and responsive to actual needs</p> <p>5.2 A safeguarding focused risk assessment will take place during every new project as part of the risk assessment process, during either the Project Design Process (PDP) or the induction phase, with a specific section on children and adults with disabilities in all cases.</p> <p>5.3 A risk assessment will also be conducted for any other activity directly involving adults at risk and/or children, including fundraising and communications activities where contact is made and information on individuals is gathered.</p> <p>5.4 The risk assessment will include mitigating actions, which will be incorporated into project design/documentation. This may include supporting training of partner staff.</p>	
<u>Putting the policy into practice III:</u> Communications activities	<p>6.1 Sightsavers representatives will ensure that appropriate consent is obtained before images or stories of adults and children are captured or shared.</p> <p>6.2 Sightsavers will ensure that adults and children are represented in an appropriate way that does not victimise or sexualise them.</p> <p>6.3 Sightsavers will only collect data on individuals for a specific authorised purpose and it will only be used as intended. It will be stored in a way that complies with relevant legislation and our own data protection procedures.</p> <p>6.4 Any breaches to the security of personal data must be reported and acted on immediately.</p> <p>6.5 Sightsavers staff will not use Sightsavers equipment to view, share or access illegal or inappropriate material, including any that specifically includes children.</p>	
<u>Reporting and responding to child safeguarding incidents</u>	<p>7.1 Sightsavers will ensure that reporting and incident management procedures to handle incidents of abuse are in place, communicated to staff and effectively used to enable an appropriate and swift investigation of any given case.</p> <p>7.2 All Sightsavers representatives must also follow appropriate and relevant national legislative and criminal reporting procedures as advised by the SFP.</p>	

## 5. Measures to implement the policy

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The safeguarding policy requires the following steps for its implementation.

**Staffing** including the designation and training of a global Safeguarding Manager (SM), as well as Safeguarding Focal Persons (SFP) in each country office.

**Prevention measures** including awareness raising, training of relevant staff, risk analysis, recruitment procedures, induction of staff in the policy and codes of conduct for Sightsavers' representatives and incorporation of the policy into relevant existing systems.

**Reporting and responding measures** including steps for alerting and reporting safeguarding concerns, investigation and incident management, duties and responsibilities of assigned managers and safeguarding focal point persons.

**Implementing and maintaining the policy**, including training and capacity building of staff and partners, monitoring, reporting and review of the policy.

### 5.1 Staffing

#### **Safeguarding Manager (SM) and Safeguarding Focal Persons (SFP)**

Sightsavers will designate a Safeguarding Manager (SM) at international level and Safeguarding Focal Persons (SFPs) to cover all countries of operation (these may be based in global teams outside of the country where relevant). These roles will be added to the job descriptions of existing staff, with the workload of those staff being adjusted to reflect safeguarding activities. The selection of the SFP will be undertaken in discussion between the most senior staff member in each country and the SM. In countries where Sightsavers has no office a staff member responsible for managing the local partner programme will be assigned. Sightsavers will not allocate this role to a non-staff member. The contact details of the SFP must be included on all country information documentation provided to visitors to the country.

There are two fundamental aspects to these roles, with specific levels of responsibility within each for the SM and each SFP:

- 1) To build the understanding and capability of the organisation required to implement this policy. This will include direct knowledge and information transfer, and accessing appropriate external expertise.
- 2) To act as the reporting mechanism for any safeguarding concern and use lessons learned from specific incidents to improve policy and practise.

Sightsavers will ensure sufficient time is given to the SM and SFPs to acquire the necessary skills and knowledge and to undertake the above activities. Line managers will recognise the priority of SFP roles in incident reporting and response when an incident occurs and the dual reporting line required for this area of work.

In addition, each country office will have a designated safeguarding “reference group” (consisting of the Country Director, the SFP and an additional senior manager where available).

The members of this group should be noted in the national safeguarding plan, but may need to be adapted in response to the specific nature of a safeguarding concern or incident, see below.

## **5.2 Prevention**

### **Staff recruitment**

All recruitment of staff will include a full induction to the safeguarding policy and code of conduct, including procedures to follow should any safeguarding concern arise.

When recruiting staff, Sightsavers will make sure that questions regarding safeguarding are included in any relevant job interviews, and that any roles with safeguarding responsibilities have those responsibilities explicitly outlined within the job description. Where possible, references should be sought from previous employers to get more information of the suitability of candidates.

According to UK government guidance on disclosure and barring service (DBS) checks, the vast majority of roles at Sightsavers are ineligible for criminal records checks. Access to adults at risk and children is incidental to the work we carry out and is not part of any staff members’ direct responsibilities. Our programmes are developed and delivered with partner organisations, and it is our partners who provide services, and work directly with beneficiaries.

On the rare occasion that a role at Sightsavers would qualify for a DBS check, this will be undertaken as part of the recruitment process. Our Safer Recruitment statement (see Annex 6) outlines our approach to recruitment in more detail.

All Sightsavers representatives will be required to acknowledge receipt of and compliance to the Safeguarding Policy and sign up to the Code of Conduct prior to their employment.

### **Awareness**

Sightsavers will designate staff with the responsibility of building internal awareness and supporting relevant capacity development of the organisation in safeguarding, as detailed in section 5.1 of this policy. All Sightsavers’ representatives and partner organisations will be duly notified of the Safeguarding Policy and be made aware of how they will be expected to comply with it. The policy will be translated into the appropriate national languages where Sightsavers operate. It will be the responsibility of all Sightsavers staff to share the policy and approach as relevant to external stakeholders.

Sightsavers will provide necessary training and support to global and country staff and partner organisations to enhance understanding and ensure effective implementation of the policy.

Sightsavers’ country offices will be requested to review and analyse their country context, and produce a local plan outlining how they will operationalise the policy in their context. Implementation processes may therefore differ from country to

country, but in all circumstances, the policy and code of conduct will remain the same. If any situations arise where national legislation conflicts with the policy, the country office must raise and discuss this with the Safeguarding Manager. Each country will develop a country policy schedule, including naming the SFP and country safeguarding reference group.

Sightsavers will ensure all supporters, donors, sponsors and media representatives involved with Sightsavers work have access to the Safeguarding Policy through its website and will take appropriate steps to communicate that availability.

### **Risk analysis**

When working with partners, Sightsavers will endeavour to ensure that the programmes it supports are safe for the adults and children they serve. To ensure that appropriate safeguarding measures have been put in place, Sightsavers will work with the partner, either during the project development process, or the inception phase, to carry out a safeguarding risk analysis which specifically includes any safeguarding issues and propose actions to mitigate these risks, prior to the activities taking place.

Such risk analysis will be an integral part of project proposals, programme planning guidelines and partnership assessment tools.

### **Code of Conduct**

All Sightsavers representatives are required to understand their responsibility to keep adults at risk and children safe, and to sign and abide by the Sightsavers Code of Conduct (Annex 1), which lists acceptable and unacceptable behaviour, primarily designed to safeguard others. It also serves to guard the name and reputation of Sightsavers and its representatives from false accusations. All staff are responsible for encouraging and promoting the implementation of the Code of Conduct.

The adherence to this code is mandatory for all Sightsavers' representatives. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant legal action. To give maximum protection to beneficiaries, the organisation and staff, the Code of Conduct is to be applied both within and outside of working hours.

## **5.3 Reporting and responding to incidents**

Sightsavers will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case. Sightsavers' representatives should be properly informed of the reporting and incident management procedures. Any Sightsavers representative who has a concern or suspicion regarding harm, exploitation or abuse by someone representing another agency must report such concerns to the Safeguarding Manager or designated SFP.

### **Confidentiality**

All reports and the information herein will be handled with strictest confidentiality to protect the identity of the individuals concerned, the informer and the accused, both appropriately and in accordance with relevant British or other national legislation.

## **Procedures to be followed in the case of an incident**

Agreed procedures to be followed are included as Annex 2.

## **Consequences of harm, exploitation or abuse**

Any behaviour towards children or adults, which results in harm, exploitation or abuse, or the failure to follow the general requirements and specific code of conduct of this policy, is grounds for the following measures:

- **Representatives**

If an employee has been under investigation by Sightsavers or by official law enforcement authorities for any area of harm, exploitation or abuse as defined under this policy, they will be subject to employee disciplinary procedures. Under these procedures they may be temporarily suspended during the investigation. If an employee is dismissed for proven harm, exploitation or abuse, Sightsavers will inform the relevant authorities, disclose this to prospective future employers and/or refuse a reference, depending on details.

- **Partner organisations**

Appropriate action will be taken up to and including immediate termination of a partnership or service agreement. In this case, the short or long-term impact on beneficiaries of the termination of a partnership will be considered.

## **5.4 Implementing, maintaining and reviewing the policy**

Sightsavers will integrate safeguarding measures into relevant core internal processes and tools such as programme technical guidelines, partner assessments and agreements, training modules, programme design, monitoring and accountability systems and recruitment procedures.

Sightsavers will make sure that proper induction and training in safeguarding will be made available to all staff, permanent and temporary, consultants and volunteers. The SM and SFPs will receive additional training in order to manage their responsibilities for rolling out, managing and coordinating the safeguarding policy and procedures.

Where relevant, Sightsavers will support partner organisations by including relevant training and technical advice to build capacity in the field of safeguarding, with a particular focus on children and adults with disabilities.

The policy will be monitored on a regular basis by the designated SM and the SFPs. An annual summary report, including all concerns received, will be submitted by the SM to senior management. Any findings requiring a change in policy will be discussed at Council

Each Sightsavers country will develop an annual implementation plan for the policy, including actions to be taken, details of the FSP and country safeguarding reference group and relevant policy amendments adopted.

## Review

A full policy review should take place every three years, instigated and led by the SM, to include a review of external changes to safeguarding standards that apply nationally and internationally.

## 6. Communications

Sightsavers is committed to adhering to ethical guiding principles on communications to minimise the risks of people misusing photographs and related information beyond the agreed purpose and consent. The best interests of the featured adult or child are to be safeguarded as a primary consideration. To this effect, Sightsavers' representatives and partners will abide by the following guidelines.

- Ensure all interviews and images of adults and children are undertaken with sensitivity to safeguard the individual's rights to dignity, identity, confidentiality and privacy. Where possible individuals should be prepared for interviews prior to being interviewed. In the case of children, a parent or guardian should be present during interviews, where appropriate, or their permission sought beforehand for a professional adult with agreed responsibility (such as medical or educational professionals) to be present on their behalf.
- Pictures of adults and children should be decent and respectful and should not stigmatize community, family or the individual. All children, both girls and boys, should wear decent clothing appropriate to the local custom.
- Prior consent to use information collected in interviews and / or images of adults and children should be obtained from the individual themselves (if they possess the maturity to do so), and in the case of children, consent must also be obtained from their parents and/or guardians<sup>7</sup>. To help keep adults and children, consideration should be given to how much information is published.
- Sightsavers and its partners are committed to guard carefully any information about adults and children who feature in their publications, ensuring that their personal data are used appropriately. This also applies when material is made available to third parties. Full names should never be provided alongside other identifiers such as date of birth or community.
- Pictures, materials and personal information regarding individuals will be held in a secure database and according to the appropriate Sightsavers data security protocols. Access to these materials will be employees only through a password-protected system. The misuse of images accessed will be treated in the same way as other breaches of this policy. Applicable data protection laws for all stored images will be followed.

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<sup>7</sup> See permission form in Annex 5



## Annex 1: definitions, acronyms and glossary

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### Definitions

#### Child

The term 'child' has the specific legal meaning of anyone below the age of 18 years (as defined by the United Nations Convention of the Rights of the Child 1989).

#### Adult

The term adult therefore refers to anyone aged 18 years or over.

#### Adult at risk

An adult at risk (Care Act 2014) is someone aged 18 or over who has care and support needs due to their age or frailty, mental or physical health problems, gender, learning or physical disabilities or the impact of disasters and conflicts, and who is unable as a result to protect themselves from harm, exploitation or abuse.

#### Abuse

Abuse occurs when an individual or individuals hurts another adult or child, either physically or mentally. In the majority of cases, the abuser is someone the victim knows well, such as a parent, other caregiver, relative or friend. Abuse can be intentional or unintentional. There are several forms of abuse including:

##### a) Physical abuse

Physical abuse is causing deliberate injury to a person, however slight. This may involve hitting, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing or attempting to cause physical harm to a person. Physical harm may also be caused through the misuse of medication, restraint or inappropriate sanctions (for example, corporal punishment) or being given alcohol or a substance that is known to cause harm.

##### b) Emotional/psychological abuse

Emotional or psychological abuse is the emotional ill-treatment of a person that adversely affects their wellbeing or development. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone. It includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks. Other harmful experiences such as frequently being forced to witness violence in their domestic environment are also classified as emotional abuse.

##### c) Neglect

Neglect is the continuing failure to prevent harm that damages or impairs health and/or development by not meeting a person's basic physical and/or psychological needs. This includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, withholding medication, inadequate hygiene, nutrition, housing or heating, or preventing someone from interacting with others. Neglect of children and adults with disabilities is more common than neglect of those without disabilities and is

often under-reported. In an international development context, some of the individuals Sightsavers works with may experience some form of neglect to basic needs. Professional judgement is needed to decide whether the experience of neglect is intentional or due to material deprivation, and should be based on the severity of the neglect and how the individual is being treated relative to their peers in the community and wider cultural norms.

#### **d) Sexual abuse**

Sexual abuse is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, inappropriate sexual contact or exposure to inappropriate material.

Any kind of sexual activity involving a child constitutes sexual abuse, whether or not the child is aware of, or consents to, what is happening. This includes rape, incest, fondling genitals, masturbation, voyeurism, exhibitionism, exposing a child to adult sexual material, or making them take part in any sexual activity, real or simulated, whether face-to-face, online, or in any other medium.

#### **e) Financial or material abuse**

Financial or material abuse is the theft or misuse of a person's property or assets. This includes money being withdrawn or stolen, goods or services purchased in someone's name without their consent, being deliberately overcharged for goods or services, misappropriation of property, possessions or benefits, or money being borrowed by someone who is providing a service to the vulnerable person.

#### **f) Discriminatory abuse**

Discriminatory abuse is repeated, ongoing or widespread discrimination due to a person's age, sex, gender, disability, racial heritage, religious belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy and maternity. This can include unfair or less favourable treatment, sexual or gender preference, slurs, harassment, name-calling, breaches of civil liberties, and unequal access to health or social care.

#### **g) Organisational abuse**

Organisational abuse is the mistreatment, abuse or neglect of children or adults by an organisation or its personnel. It can take place within settings and services that children or adults live in or use, and it violates their dignity, resulting in a lack of respect for their human rights. It can take the form of an organisation failing to respond to or address incidents of poor practice brought to its attention.

#### **h) Exploitation**

Those who want to exploit children and adults will seek out those who are in vulnerable circumstances to use them for their own purpose, activity or gratification. This could be financial, commercial, sexual or related to extremism and terrorism. Exploitation involves a process of grooming; when someone builds an emotional connection with a child or adult to gain their trust for the purpose of exploitation. They may also manipulate their environment, so they become isolated from those who could help or support them. Those affected may not realise they have been groomed, or that what has happened is abuse.



Types of exploitation include:

- **Sexual exploitation:** a type of sexual abuse in which children or adults are sexually exploited for money, power or status. Some children and adults are trafficked into or within a country for this purpose. They may be tricked into believing they are in a loving, consensual relationship. Abusers will use various means to gain compliance such as drugs, alcohol, gifts, threats and bribes.
- **Modern slavery (human trafficking):** this includes forced labour, domestic servitude or coercing, deceiving and forcing an individual into a life of abuse. People are trafficked for sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and illegal work. Some people are coerced, but most are trapped in subversive ways. For example, promised education or 'respectable' work in restaurants or as domestic servants, or parents may be persuaded that their children will have a better life elsewhere.
- **Radicalisation:** the process by which those who are vulnerable come to support terrorism or violent extremism and, in some cases, to directly participate in or support terrorist groups. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. It may follow experience of racism or discrimination. They believe that joining a movement offers social and psychological rewards such as adventure, camaraderie and a heightened sense of identity.

#### i) Harmful traditional practices

Harmful traditional practices are forms of violence which have been committed (primarily against women and girls) in some communities and societies for so long that they are considered, or presented by abusers, as part of accepted practice. Such traditions include Female Genital Mutilation (FGM) and forced early marriage. They may also include different forms of ritual ceremonies involving individuals in harmful religious or spiritual activities. Children and adults with disabilities may be at higher risk of becoming victims of witchcraft beliefs in certain contexts for example individuals with albinism.

## Acronyms/glossary

### Best interest of the child

An overarching principle in the Convention on the Rights of the Child:

"in all actions concerning children, whether undertaken by public or private institutions, the best interest of the child should be a primary consideration. In all matters affecting the child, the views of the child should be seen as important and given due weight in accordance with the age and maturity of the child."

**Child and adult protection**

Child or adult protection is specifically about the steps and measures an organisation or society puts in place to protect individuals identified as either suffering, or likely to suffer from harm, exploitation, and abuse.

**Safeguarding**

Safeguarding means promoting and protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means minimising the risk of harm to children and adults from staff, representatives and partners; our operations and programme activities including and includes responding appropriately to any safeguarding concerns about children and adults within communities where we work.

**CRC** The UN Convention on the Rights of the Child (1989)

**CRPD** The UN Convention on the Rights of Persons with Disabilities (2008)

**SFP** Safeguarding Focal Person

**SM** Safeguarding Manager

**Sightsavers representatives**

Sightsavers' employees, permanent and temporary, consultants and volunteers employed by Sightsavers.

**Safeguarding concern**

A safeguarding concern is when someone is worried about the safety or well-being of a child or adult because of something seen or heard, or information that has been given to them. A safeguarding concern can involve a Sightsavers representative, or a representative from another organisation, endangering the safety or wellbeing of others, for example, by not following the code of conduct.

## Annex 2: Incident management procedures

### Procedures to be followed in the case of an incident

1. Any representative of Sightsavers who has a safeguarding concern must report it immediately to the designated SFP in the country where the incident occurred. If the representative cannot contact the SFP, the SM must be informed before other staff in the country are informed.
2. From the point when they are aware of the incident, the SFP must submit a written report<sup>8</sup> to the SM wherever possible within 24 hours or, if this isn't possible, to call, email or text a summary report within this period, with a written report to follow as soon as possible. The SM should then inform the Head of Governance and Assurance (HGA). The HGA maintains a formal record of all such reported incidents, which must be summarised and reported, in the annual return made to the Charities Commission.
3. The SM and HGA will assess the severity of the incident and decide whether to invoke the global crisis response process. In all cases, Sightsavers' CEO will be informed of the incident and crisis response, with all relevant staff and governance level communication initiated. In all instances, the CEO will inform, as a minimum, one of the following Trustees: the Chairman, Vice Chairman, Treasurer or Chairman of the Audit Committee.
4. If the incident is deemed not to require a crisis response, it will be dealt with by the relevant country safeguarding reference group, the SM will communicate with the most senior member to initiate the group. This may involve adding an additional member or members, including external members such as a lawyer.
5. If all or part of the role of the country safeguarding reference group is to be played by the global crisis response team, that team will include the SM and country staff as appropriate. The first meeting of the team will agree the roles of the global and country teams, in accordance with the procedures and control documentation in Sightsavers' Crisis Management Protocol.
6. Once constituted, the group will determine the immediate steps to be taken including:
  - a) Reporting immediately, or as soon as possible after becoming aware, to relevant local law enforcement agencies or any other external body if the matter is of a criminal nature. All incidents globally must be reported in the UK to the Charities Commission ([rsi@charitycommission.gsi.gov.uk](mailto:rsi@charitycommission.gsi.gov.uk)), and other affected organisations must also be advised (this includes major donors and other regulatory bodies).

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<sup>8</sup> Annex 4: Reporting form for suspected cases of abuse

- b) Referring the individual concerned to the relevant support services, or ensuring the partner organisation directly in contract with the child or adult does so.
- c) Monitoring and reporting on the progress of the investigation and providing information and guidance as appropriate,
- d) Supporting staff in any related legal procedures, such as giving of evidence.
- e) Liaising with the SM to determine if an internal investigation is required and if the matter is viewed as a breach of this policy, including whether disciplinary procedures should be invoked.
- f) Subsequent to the investigation, the SM will compile a written report including all necessary information on the nature of the case, safeguarding concerns, investigation process and any learning to inform policy, practice, programmes or country plans.

## Annex 3: Code of Conduct

### To be applied within and out of working hours<sup>9</sup>

I, (insert name), acknowledge that I have read and understand Sightsavers' Safeguarding Policy.

#### By signing this document, I agree:

- To comply with Sightsavers' Safeguarding Policy and this Code.
- To report any concerns or incidents in line with procedures set out in the policy.
- To raise awareness of the policy and Code of Conduct in my work environment.

#### I will:

- Be committed to playing my part in creating a culture of openness and mutual accountability in the work place. This culture will enable all safeguarding concerns to be both raised and discussed. This will in turn ensure inappropriate and abusive behaviour is challenged.
- Help create and/or uphold an environment that is safe, positive and encouraging, where people are listened to and respected as individuals.
- Ensure the use of the 'Two Adult Rule'. This means, when interacting with at-risk adults and/or children in a work context, I will ensure that another adult is present or within reach at all times.
- Ensure physical contact is at all times appropriate and not an invasion of the individual's privacy.
- Use positive, non-violent methods to manage behaviour.
- Respect an individual's dignity and their need to be safeguarded at all times when taking photographs, filming or writing reports.
- Ensure that when photographing, filming or interviewing children and adults, the guidelines within the policy are followed and that consent has been obtained, individuals are properly dressed and are not depicted in a way that is abusive, sexually provocative, demeaning or culturally inappropriate or that characterises them as being reliant on the viewer<sup>10</sup>.
- Protect and handle personal data of others with care, to minimise the risks posed by third parties who receive information about children and adults from Sightsavers or its partner organisations.
- Respond to safeguarding concerns according to the reporting protocol<sup>11</sup>.
- Comply with any investigation led by official bodies (including interviews) and make available any information necessary.

<sup>9</sup> For consultants and volunteers, this only applies while undertaking Sightsavers business, but this includes out of working hours while on Sightsavers business.

<sup>10</sup> Consent Form is in Annex 5 of the Safeguarding Policy

<sup>11</sup> Reporting form for safeguarding concerns is in Annex 4 of the Safeguarding Policy

**I will never:**

- Engage in sexual activity or have a sexual relationship with a child, regardless of consent or local custom. Mistaken belief in the age of a child is not a defence.
- Condone or in any way force an adult at risk, or a child, to participate in any form of sexual activity, real or simulated, on the internet or in any other medium.
- Make sexually suggestive comments or actions to a child, even as a joke.
- Touch, hold, kiss or cuddle an adult at risk, or a child, in an inappropriate and/ or culturally insensitive way.
- Marry a person below the age of 18, regardless of consent or local custom.
- Help at-risk adults or children with acts of an intimate or private nature, which they can do for themselves. Such actions may only be undertaken for an individual who has acknowledged the need for that assistance directly, or through a parent/guardian.
- Engage in activities involving close body contact with at-risk adults and/or children, beyond professional requirements
- Hit or otherwise physically assault, or physically abuse anyone, nor use any form of corporal punishment as a disciplinary measure.
- Condone, or participate in behaviour with at-risk adults or children that is illegal, unsafe or abusive, including being part of harmful traditional practices, spiritual, ritualistic or substance abuse.
- Act in ways intended to shame, humiliate, belittle or degrade others, or otherwise perpetrate any form of emotional abuse.
- Exploit adults or children for their labour (e.g. domestic servitude, street begging) or for sexual purposes, or participate in the trafficking of children. 'Child domestic servitude' does not include occasional house help, babysitting, kitchen gardening during school holidays or general domestic tasks out of school time.
- Develop relationships with children or adults that could be deemed exploitative or abusive.
- Spend excessive time alone with an at-risk adult, or a child, away from others, behind closed doors or in a secluded area (in line with the 'Two Adult Rule')
- Take an at-risk adult, or a child, who has been involved in our programmes, to my home, or visit them in their home where I may be alone with them.
- Sleep in the same bed or the same room as an at-risk adult or a child met through work, or allow them to stay overnight at my home.
- Take an at-risk adult or a child met through work alone in a vehicle unless it is absolutely necessary, and only with parental/guardian and managerial consent.

**Location and date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

## Annex 4: Incident reporting form

### Safeguarding incident reporting form

Send to Sightsavers' **Safeguarding Manager** ([safeguarding@sightsavers.org](mailto:safeguarding@sightsavers.org)).  
Use the email subject: 'URGENT: Attention, please treat this email confidentially'

This form is for reporting safeguarding concerns, including potential violations of Sightsavers' Safeguarding Policy and/or Code of Conduct. The information in this form is confidential. Please provide as much information as possible.

**Areas where you have nothing to report should be left blank.**

#### 1. Please indicate the nature of your concern (tick any that apply)

1a. Concerns that specific children or adults may have been harmed or are at risk of harm if no action is taken	Tick if relevant
<b>You have evidence that an adult or child has been, or may be at risk of, being harmed, abused, or exploited</b> (e.g. eyewitness accounts of abuse, visible injuries, victim confided in someone)	
<b>You are concerned about someone's behaviour towards an adult or child</b> (e.g. signs of aggression, obsession, or unhealthy interests have been observed)	
<b>You are concerned for the safety or welfare of an adult or child.</b> (e.g. signs or indicators of harm/abuse have been observed in the adult or child)	
How did this concern come to your attention? Please give details, including whether you observed it in person, if someone else reported it to you, or if the victim told you directly.	

1b. Concerns about general behaviour, practices or infrastructure, that could be putting people at risk	Tick if relevant
<b>Concern about someone's general behaviour</b> (e.g. breaking a condition of the Code of Conduct)	
<b>Concern about the infrastructure, protocols or practices of a school, hospital, clinic or other organisation that could be putting people at risk</b> (e.g. unclean/unsafe facilities, use of corporal punishment, lack of fire exits)	
How did this concern come to your attention? Please give details, including whether you observed it in person or if someone else reported it to you.	

## 2. Information about you

<b>Name</b>	
<b>Position at Sightsavers</b> (Or relationship to Sightsavers)	
<b>Phone no</b>	
<b>Email</b>	

## 3. Information about your concern

<b>Nature of concern/suspicion/incident</b> Describe your concerns, what you have witnessed or what has been reported to you. Give as many details as possible; take as much space as needed.
<b>Country where the incident or concern has arisen</b>
<b>If the concern is linked to a Sightsavers project, please give project no/name</b>
<b>Date (or time period) of the incident or concern</b>
<b>Is there a concern that specific individuals still are, or could be, at risk of harm?</b> If yes, please provide details below.



## 4. Observations and actions

### Conversation report

If the concern was reported to you by someone else, or if you have spoken to any individuals who are directly affected, please describe here what he or she told you, and what you said.

### Observations

Such as injuries, emotional state of the child or adult affected, or the physical state of facilities.

### Cultural factors

Please mention any specific cultural factors that need to be taken into consideration.

### Action taken

Have any measures been taken, for example to improve the safety of facilities, and/or to protect any affected individuals? If so, please describe.

### Any additional measures not yet undertaken

Do you feel that any other measures – in addition to those already undertaken – are necessary, to ensure people's immediate safety? If so, please give details.

**What communication (if any) have you had with the suspected individual/organisation (if relevant) regarding this concern?**

**What communication (if any) have you had with the victim (if relevant) and/or any authorities/bodies regarding this incident?**

**Your signature:**

**Date:**

## Annex 5: Permission for collection and use of content

### Translate and/or read this statement:

Sightsavers uses stories of people affected by sight loss, disease and/or disability to show why our support is needed. To do this, we request your permission to take photos and/or videos, interview you and record your voice. If you give your permission, your content may be used:

- in external communications (including TV, fundraising, websites, social media, newspapers and magazines, radio, posters, exhibitions)
- by Sightsavers, our partners, donors and supporters
- internationally and in your country
- to show the challenges you have faced, or how you have benefited from our support

If you give your permission, we will store your content securely for up to five years, after which it will be archived with restricted access. Occasionally it may be used for longer than five years.

**You have the right to refuse. This will have no impact on support you may receive from us.**

### Participant details

1. Name of participant: .....
2. Age ..... (children age 7-18 must sign in addition to their parent/guardian):
3. Location: .....
4. If signing on behalf of a group/institution, your position: .....
5. If signing on behalf of a child under 18, or someone who cannot sign for themselves:  
Name of parent/guardian: .....  
Relationship with participant: .....
6. Do agree for your full, real name to be used? (if no, please give details): **Yes** ☐ **No** ☐  
.....
7. Any other notes or special instructions:  
.....

### Participant declaration

**I sign to say I understand the information above and give my consent for my photo, video, story and voice to be collected and used as described.**

Participant (aged 7 or older): ..... Parent/guardian: ..... Date: .....

To help us match permission to photos, please write a description of the participant (eg describe clothing or other distinguishing features):

.....  
.....

## Annex 6: Safer Recruitment statement

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Sightsavers is committed to minimising the risk of harm to children and adults at risk from staff, operations and programme activities. We will carefully select, train and support all staff in line with our Safer Recruitment principles.

This means we will:

- Ensure that our recruitment and selection processes are inclusive, fair, consistent and transparent;
- Take all reasonable steps to prevent those who might harm children or adults from working for us;
- Adhere to safer recruitment guidance and standards, responding positively to changing understandings of safer recruitment practice; and
- Always seek advice from the HR Operations Team to achieve best possible practice in relation to recruitment.

### What is Safer Recruitment?

Safer recruitment means giving consideration to safeguarding issues at every stage of the recruitment process. It is known that people who seek to harm others by using their professional or volunteer status will look for an organisation or project with weak recruitment practices, where they can have access to at-risk adults or children.

Sightsavers' safer recruitment guidelines means that potential employees must:

- Complete the specified application process for the role to which they have applied, indicating whether they know anyone who works for Sightsavers and if so their relationship to that person or persons;
- Where determined by HR, complete a self-disclosure form to disclose previous spent/unspent convictions and disciplinary or capability issues;
- Undertake an interview to assess suitability and capability to carry out the role. Please note that interview panels consist of a minimum of two people with no prior connection to the interviewees. Interview records are retained for six months following the date of the interview and may be held longer for successful candidates that become employees;
- If offered a role, provide references covering the previous three year period, accounting for any gaps in employment; and
- If offered employment, provide identity documents including photographic identity and evidence of their right to work in the respective country.

### Criminal records checks

According to UK government guidance on disclosure and barring service (DBS) checks, the vast majority of roles at Sightsavers are ineligible for criminal record checks. Access to adults at risk and children is incidental to the work we carry out and is not part of any staff members' direct responsibilities. Our programmes are developed and delivered with partner organisations, and it is our partners who provide services and work directly with beneficiaries. Our programmes team work with partners to ensure they have good safeguarding policies and procedures in

place, and where appropriate the Compliance Team will encourage criminal records checks be carried out by partners for eligible staff and volunteers.

On the rare occasion that the Compliance Team have determined that a role at Sightsavers would qualify for a DBS check, this will be undertaken as part of the recruitment process, as agreed with the relevant HR Operations recruiter.

## **How do we reduce the risk of adults or children being harmed by Sightsavers staff?**

We believe that the best safeguard is a high standard of management practice and quality control consistently applied to employees at recruitment and selection and subsequently through induction, performance management and review, support & supervision and monitoring.

We do this through:

- Ensuring all potential applicants are aware of our safeguarding commitments via the job advert pages on our website;
- A clear recruitment and selection process which ensure employment checks and references are completed before an individual starts work and gaps in employment are questioned;
- Providing training and guidance to recruiting managers on all aspects of recruitment and safeguarding training to senior members of staff and Safeguarding Focal Persons (see Safeguarding Policy for more details)
- Our safeguarding policy which makes it clear that child abuse is unacceptable and will result in disciplinary measures and notification of relevant law enforcement agencies;
- Our Safeguarding Code of Conduct which clearly identifies acceptable and unacceptable behaviour;
- A 'two adult rule' which means that no member of staff should ever be alone with an adult at risk or a child;
- Ensuring all staff read the Safeguarding Policy and sign the Safeguarding Code of Conduct as part of their induction;
- Reviewing staff performance throughout their employment with the organisation including probation reviews in countries that operate a probation rule;
- Providing clear, accurate references for leavers reflecting conduct where appropriate;
- Having clear reporting and incident management procedures for safeguarding concerns, including concerns about staff members' behaviour as detailed in the Safeguarding Policy; and
- Publicising our Whistleblowing policy which protects employees, officers, consultants, contractors, volunteers, casual workers and agency staff who raise a concern, and allows concerns to be reported in confidence.



[www.sightsavers.org](http://www.sightsavers.org)

Registered charity numbers 207544 and SC038110

