

## Safeguarding Policy for Children and Vulnerable Adults

## Who we are

Survivor Alliance is a registered 501c3 in the United States of America (EIN: 82-4425458). We work with adult survivors of human trafficking and modern slavery around the world to ensure lived experience expertise is driving the anti-trafficking sector. Our programs include Global Membership, Leadership, Employment Pathways, Movement Building, and Consulting Services.

#### **Our Vision**

A world where survivors of slavery and human trafficking are thriving members of society.

## **Our Mission**

Our mission is to unite and empower survivors of slavery and human trafficking around the world to become leaders of the anti-trafficking movement.

# Our Values as Applied to Safeguarding

**Empathy:** Empathy requires understanding something from the other person's point of view. In safeguarding, it is our commitment to listen to the person affected/harmed and create an environment where everyone can be able to speak about harm.

**Resilient Relationships:** Healing occurs in relationships that can withstand conflicts and that include proactive repair. It is a recognition that even when harm is caused, repair and healing is possible.

**Freedom:** We hold that freedom is both an individual and a collective journey. A life in freedom may not be absent of injury or harm, but harm can be addressed in a way that contributes to an experience of freedom.

**Learning:** Everyone deserves grace and support in their learning process. We challenge the idea that an expert must or can know everything. It is our commitment to consistently learn from each other in order to make each other feel as safe as possible.

**Authenticity:** Part of our safeguarding approach is to allow each person to be exactly who they are. This means recognizing people of all genders, races, ethnicities, nationalities, citizenship status, religion, abilities, etc.

#### **Purpose**

The purpose of Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy is;

- 1. To provide staff and volunteers, as well as children/vulnerable people and their communities, with the overarching principles that guide our approach to child and vulnerable people's protection
- 2. To promote a culture of wellbeing for Survivor Alliance staff, members, and partners that we work with.
- 3. To ensure that Survivor Alliance projects, workers, or others working with or on behalf of Survivor Alliance do no harm to children and/or vulnerable adults that we encounter.
- 4. To ensure that safety risks and cases of misconduct are identified, reported, and addressed in an appropriate and timely manner.

## Scope

The Survivor Alliance Safeguarding Policy pertains to all its "Representatives," including Survivor Alliance's Board members, Survivor Alliance's Employees, Suppliers/Subcontractors, Implementing Partners, members, and visitors who have direct contact with children and/or vulnerable adults through projects that are implemented or financially supported by Survivor Alliance.

## **Definitions**

A. *Child* – For the purpose of this policy, a child is defined as anyone under the age of eighteen years, in accordance with Article 1 of the UN Convention on the Rights of the Child. <sup>1</sup>

<sup>&</sup>lt;sup>1</sup> United Nations Convention on the Rights of the Child, 1989, Article 1.

- B. **Child Abuse and Exploitation** For the purpose of this policy, "child abuse" and "child exploitation" shall mean all forms of physical and/or emotional ill-treatment, sexual abuse, neglect, or negligent treatment, or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power.
- C. **Child Beneficiary**—For the purpose of this policy, "child beneficiary" refers to a child who benefits from or meets projects implemented or financially supported by Survivor Alliance. Survivor Alliance might only serve child beneficiaries if they are emancipated youth or if their adult parent is receiving child care support in order to participate in our programs.
- D. **Harm** For the purpose of this policy, "harm" refers to physical or psychological injury or damage to a child or vulnerable adult's health, survival, development, or dignity.
- E. *Implementing Partners* For the purpose of this policy, "Implementing Partners" refers to private and public entities, other than our Suppliers/Subcontractors, with which Survivor Alliance has a contractual agreement or memorandum of understanding (MoU) for the purposes of project implementation.
- F. *Representatives* For the purpose of this policy, "Representatives" refers to Survivor Alliance's Board members, Survivor Alliance Employees, Suppliers/Subcontractors, Implementing Partners and Visitors who have direct contact with children and/or vulnerable adults through projects implemented or financially supported by Survivor Alliance.
- G. **Suppliers/Subcontractors** For the purpose of this policy, "Suppliers/Subcontractors" refer to individuals, companies, or organizations with whom Survivor Alliance has a contractual relationship for the provision of goods or services.
- H. *Survivor Alliance Workers* For the purpose of this policy, "Survivor Alliance Worker" refers to employees, fellows and interns, incentive workers, volunteers, contracted workers, consultants, and independent contractors.
- I. *Visitors* For the purpose of this policy, "Visitors" refers to individuals hosted by the Survivor Alliance, who are visiting projects implemented or financially supported by Survivor Alliance and are not Survivor Alliance Workers, or others involved in project implementation. It includes journalists, photographers, Survivor Alliance voices, board members, and donors, among others.
- J. *Vulnerable Adults* For the purpose of this policy, "vulnerable adult" refers to an adult who may be unable to take care of themselves or protect themselves from harm or exploitation. Such vulnerable adults may be at greater risk of abuse and exploitation due to a variety of risk factors, such as (without limitation) gender, gender identity or expression, health issues (including mental health), disabilities, age, sexual orientation, ethnic, geographic, or national origin, family status, partnership status, race, religion or belief, economic background and particular trade or profession, or because of the impact of conflict and crisis.

## Legal framework

This policy has been drawn up based on legislation, policy and guidance that seeks to protect children not only internationally, but also commits to apply any local legislation in the countries that we operate. A summary of the key international policies include:

- [2] United Nations Convention on the Rights of the Child, 1989. Article 19: 'State Parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse.' http://www2.ohchr.org/english/law/pdf/crc.pdf.
- [3] Examples include: International Convention on the Elimination of All Forms of Racial Discrimination; International Covenant on Civil and Political Rights; Convention on the Elimination of All Forms of Discrimination against Women; Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; Convention on the Rights of the Child, Convention on the Rights of Person with Disabilities.

## We believe that:

• Children, young people, and vulnerable adults should never experience abuse of any kind. • We have a responsibility to promote the welfare of all children, young people, and vulnerable adults, to keep them safe and to practise in a way that protects them and promotes their wellbeing.

## We recognise that:

- The welfare of children/vulnerable adults is paramount in all the work we do and in all the decisions we make, all children/vulnerable adults, regardless of age, disability, gender identity or expression, race, religion or belief, or sexual orientation have an equal right to protection from all types of harm or abuse.
- Some children/vulnerable adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- Working in partnership with children/vulnerable adults, their parents, carers, community, and other agencies is essential in promoting their welfare.

## We will seek to keep children and vulnerable adults by:

- Valuing, listening to and respecting them.
- Appointing a nominated safeguarding lead for children, young people and vulnerable adults, a deputy, and a lead trustee/board member for safeguarding.
- Adopting protection and safeguarding best practice through our policies, procedures, and code of conduct for staff and volunteers
- Providing effective management for staff and volunteers through supervision, support, training, and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures, and behaviour codes confidently and competently.
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made. Sharing information about safeguarding and good practice with children, vulnerable adults and their families via information made publicly available through our website and to our membership. Making sure that children, young people, vulnerable adults, and their families know where to go for help if they have a concern.
- Using our safeguarding and protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families, and carers appropriately.
- Using our procedures to manage any allegations against staff and volunteers appropriately. Creating and maintaining an anti-bullying environment as affirmed in the Employee Handbook and dealing with issues that arise as guided by the same.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for our children, young people, vulnerable adults, staff, and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.
- Building a safeguarding culture where staff and volunteers, children, young people, vulnerable adults and their families, treat each other with respect and are comfortable about sharing concerns. Providing support for any person harmed in the course of our work. This includes connecting the person to support services and any additional support identified in the investigation report provided by the Designated Person.
- Holding perpetrators accountable.

## **Safeguarding Roles**

## **Role of the Designated Person**

- Take responsibility to follow the procedures as appropriate to the case, as explained below.
- Report to and ensure the police and civil authorities are informed about each formal complaint of the abuse received.
- Ensure that the guidance of the Child and Vulnerable Adult Protection Policy will be followed in all cases of alleged abuse.
- Ensure that all allegations or rumours are dealt with in an immediate, compassionate, confidential and responsible manner.
- Report to the Executive Director on an annual basis.

#### Role of the Deputy Designated Person:

- Take the responsibility attached to the Designated Person in a situation where the Designated Person is unable to perform their duties.
- Aid the Designated Person upon request.
- Take the responsibility for the case that is personally involving the Designated Person. Act as Designated Person in case the Designated Person resigns until the new Designated Person is nominated by the Board of Survivor Alliance.

## The Survivor Alliance Executive Director must ensure

- That there will be no attempt to reassign a person against whom an allegation has been made to another area work with access to children and vulnerable adults during the period of investigation and that support should be shown to him/ her.
- That the accused will be advised of the legal implications and ramifications attendant to the report of the alleged abuse.
- That there will be full cooperation with the public authorities that may be investigating the matter and that there will be no interference with any investigations.
- That where a complaint concerns a deceased staff or a former staff member during his/her time of service, an appropriate response will be provided.
- That monitoring, safeguarding training and awareness raising is completed.
- Present the annual report on safeguarding issues prepared by the designated person at the board meeting. Suggest personnel changes (if necessary) to the position of Designated Person and its Deputy for approval to the Board of Survivor Alliance.

#### **POLICY STATEMENTS**

In accordance with Article 19 of the United Nations Convention on the Rights of the Child (UNCRC), Survivor Alliance recognizes the right of all children to be protected from all forms of abuse and exploitation. Additionally, SA affirms the Universal Human Rights Convention that provides the right for everyone to be free from abuse, exploitation, and harassment.

The Survivor Alliance further recognizes its responsibility to ensure that Survivor Alliance projects, Representatives, and others working with or on behalf of the Survivor Alliance do no harm to children and/or vulnerable adults.

Persons covered by this policy shall not engage in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child, including Article 32 thereof, which, inter alia, requires that a child shall be protected from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development.

The Survivor Alliance is committed to ensuring that our organizational policies, protocol, procedures, and actions reflect our commitment to fulfilling this responsibility.

#### 1. Zero Tolerance

The Survivor Alliance has a zero-tolerance policy regarding the abuse and exploitation of children and/or vulnerable adults. Survivor Alliance Representatives are prohibited from engaging in any form of abuse or exploitation of children and/or vulnerable adults and are required to report all suspicions and allegations.

## 2. Policy Implementation and monitoring and evaluation

The Survivor Alliance shall implement the Child and Vulnerable Adult Safeguarding Policy and monitor its application over time. In addition to Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy, Survivor Alliance is also committed to making all efforts to ensure that Survivor Alliance Representatives comply with the Survivor Alliance Code of Conduct.

2.1.1 Seeing that every Representative has access to the policy in a language they understand. For this to happen,

the policy will be printed and made available to the staff. Training sessions will be given regularly at induction to all newcomers, and annually to long term staff and volunteers.

- 2.1.2 Fostering a safe climate in the workplace whereby all concerned can use their skills; confer with the colleagues for assistance/advice and so implement the policy in a competent and compassionate manner. 2.1.3 Keeping abreast of any changes in international, national, or more locally based issues that may impact the policy or its implementation and taking action to remove barriers blocking its full implementation should these exist.
- 2.1.4 Accepting feedback on any difficulties in the policy implementation from any source and working to alleviate these.
- 2.2 Survivor Alliance is committed to monitoring and evaluating this safeguarding policy and making changes where necessary based on the lessons learned. Designated persons will be responsible for: 2.2.1 Supporting management to create and maintain a work environment where feedback, on-going learning, openness, review, audit contribution of opinions, correction, clarification, and positive challenge are accepted attributes to work ethic of all projects. In this milieu, the M & E process will happen more easily and with greater effect.
- 2.2.2 Building the M&E of the Safeguarding policy into the regular work of all the projects, this can be done both formally and informally. For the former, a suggested time to do this could be when the annual report is being deliberated and written; allocating a sub-section of the report to information-sharing about this aspect of the project's work is to be encouraged. Informal monitoring can be done by each staff member on their monthly checklist review.

## 3. Recruitment

Survivor Alliance is committed to ensuring that Survivor Alliance Workers are suitable to work with children and/or vulnerable adults and are informed of their responsibility to uphold and abide by the Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy. Survivor Alliance also recognises that minorities including survivors of trafficking may possess criminal records as a result of their experience of trafficking or as a result of attempts to survive in a system that can be oppressive. As a result, there might be cases where Survivor Alliance workers may have a criminal record. Survivor Alliance workers will be required to personally disclose any criminal records they may possess prior to employment.

- **3.1** Reference checks, criminal background checks, or other available means are conducted prior to an employment offer being extended to all Survivor Alliance staff, including those who will be in direct contact with children and/or vulnerable adults.
- **3.2** Candidates for posts involving direct contact with children and/or vulnerable adults are specifically vetted through targeted questioning.
- **3.3** Staff orientation materials and employment contracts and agreements for new and returning staff members include the responsibility to abide by the Child and Vulnerable Adult Safeguarding Policy.

# 4. Behavioural Protocol for Staff

Survivor Alliance is committed to ensuring that its Representatives conduct themselves in a way that is safe for children and/or vulnerable adults.

- **4.1** Survivor Alliance Representatives are required to comply with the behavioural protocol outlined below including guidelines outlined in the staff code of conduct: for members of staff.
  - **4.1.1** Survivor Alliance Representatives must *not*:
    - **a.** Physically punish or discipline child beneficiaries.
    - **b.** Do things for children of an intimate, personal nature that they can do for themselves. **c.** Act in ways intended to shame, humiliate, belittle, or degrade children, or otherwise perpetrate any form of emotional abuse.
    - d. Engage in sexual activity with children, regardless of the age of consent locally.
    - **e.** Use language or behaviour around or towards children that is inappropriate, harassing, abusive, sexually provocative, or demeaning.
    - **f.** Invite child beneficiaries into their accommodation (including home, guesthouse, hotel, apartment, etc.), unless the supervisor has agreed that it is necessary for the protection of the child. **g.** Sleep in the

same bed or room as a child beneficiary.

- **h.** Discriminate against, show differential treatment to, or favour children to the exclusion of others. **i.** Hire children for domestic or other labour which violates national labour laws, is inappropriate given their age or developmental stage, interferes with their education or recreational activities, or places them at significant risk of injury.
- **j.** Develop relationships with children that could in any way be deemed inappropriate, exploitative, or abusive.
- k. Use any computers, mobile phones, video cameras, or social media to harass children.
- I. Access child pornography through any medium.
- **4.1.2** Survivor Alliance Representatives *must*:
  - **a.** Ensure wherever possible that when working with individual children, another adult is present. **b.** Ensure that images taken of children (e.g., photographs and videos) are accurate and respect children's privacy and dignity. Children must be adequately clothed in images. Sexually suggestive poses are prohibited.
  - c. Abide by Survivor Alliance's Ethical Guidelines when working with or questioning children/vulnerable adults
  - **d.** Obtain informed consent from children and their caregivers before taking photographs of them, except under exceptional circumstances where this may not be possible or may not be in the best interest of the child. When possible and appropriate, this consent should be in writing and children and caregivers should be informed of how the images will be used.
  - **e.** Restrict use of images of child beneficiaries to professional, respectful, awareness raising, fundraising, publicity, and programmatic purposes.
  - **f.** Ensure that any image or recorded case history of a child/vulnerable adult does not place him/her at risk or render him/her vulnerable to any form of abuse.
  - **g.** Respect principles of confidentiality abide by applicable data protection protocols, and only share children/vulnerable adult's personal information on a need-to-know basis.
  - h. Make all effort to minimize risk of harm to child/vulnerable adult beneficiaries.
  - **i.** Immediately report suspicion or allegations of child abuse or exploitation, or policy non-compliance as outlined in this Child Safeguarding Policy and/or in accordance with the Survivor Alliance's Reporting Policy in section 8.
- **4.2** Survivor Alliance ensures that its Representatives are informed of their obligation to abide by the behaviour protocol outlined herein and to abide by Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy.
  - **4.2.1** The Survivor Alliance Child and Vulnerable Adult Safeguarding Policy is distributed to and reviewed with all Survivor Alliance Workers.
  - **4.2.2** Survivor Alliance ensures that all Survivor Alliance Workers are aware of the existence and requirements of Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy.
- **4.3** Survivor Alliance informs Visitors of its Child and Vulnerable Adult Safeguarding Policy where appropriate, and where Visitors will be in direct contact with children and/or vulnerable adults.
- **4.4** Suppliers/Subcontractors, and Implementing Partners who have direct contact with children and/or vulnerable adults through projects implemented or financially supported by Survivor Alliance must agree in writing to ensure that during their association with the Survivor Alliance, they and their representatives comply with Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy or their own code of conduct of a similar standard (which is reviewed by Survivor Alliance).
- **4.5** Survivor Alliance Representatives must provide information to beneficiaries they are working with about Survivor Alliance, the principles it adheres to, how it expects its staff to behave, the programs it is implementing and what they intend to deliver.

#### 5. Training

Survivor Alliance is committed to ensuring that Survivor Alliance Workers have the knowledge they need to uphold and abide by the Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy.

**5.1** Survivor Alliance includes information on the Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy in its orientation materials.

- **5.2** Survivor Alliance provides basic orientation with respect to its behavioural requirements to new Survivor Alliance Workers as part of orientation and to existing employees in all Survivor Alliance offices on an ongoing basis.
- **5.3** Refresher courses will be held annually at a bare minimum. The training will be carried out by the staff of the project and outsourcing could be done if need be. The budget for this will be included in the amount set aside for capacity building and project management.
- **5.4.** Training work plan template is included in Appendix 4.

#### 6. Communications

Survivor Alliance is committed to ensuring that depictions of children —in words and images—protect their identity and respect their dignity and rights. Survivor Alliance is committed to ensuring that depictions of vulnerable adults respect their dignity and their rights.

- **6.1** The following standards guide Survivor Alliance communications about children:
  - **6.1.1** Depictions of children must respect children's privacy and present children in a respectful, dignified manner.
  - **6.1.2** Children must be adequately clothed in images. Sexually suggestive poses are not permitted. **6.1.3** Informed consent must be obtained from children/their caregivers and vulnerable adults before taking photographs of them, except under exceptional circumstances where this may not be possible. When possible and appropriate, this consent should be in writing and children and caregivers should be informed of how the images will be used.
  - **6.1.4** Use of images of child beneficiaries shall be restricted to professional, respectful, awareness raising, fundraising, publicity, and programmatic purposes.
  - **6.1.5** Caution must be taken to ensure that no image or recorded case history of a child /vulnerable adult places him/her at risk or renders him/her vulnerable to any form of abuse.
- **6.2** Survivor Alliance is required to include these communications standards in Survivor Alliance Communications Guidelines for Survivor Alliance Workers, journalists, photographers, and Visitors to Survivor Alliance projects.

# 7. Safety, Security, and Dignity

Survivor Alliance is committed to ensuring that no harm, whether intentional or unintentional, comes to children or vulnerable adults because of Survivor Alliance projects.

- **7.1** Where the Survivor Alliance has direct responsibility for a child in the course of running projects, children must be adequately always supervised.
- **7.2** Survivor Alliance Representatives should, where possible, ensure that proposals demonstrate that the risks children and/or vulnerable adults may face because of a project have been identified and addressed, and will be monitored.
- **7.3** To ensure that no harm comes to children and/or vulnerable adults as result of collecting or storing their personal information, Survivor Alliance Representatives must comply with the data protection protocol below:
- **7.3.1** Prior to collecting personal information from a child and/or vulnerable adult, Survivor Alliance Representatives must identify and take steps to address potential risks related to the collection and storage of such children's and/or vulnerable adult's data.
  - **7.3.2** Prior to collecting personal information from a child and/or vulnerable adult, Survivor Alliance Representatives must explain to the child and/or vulnerable adult what information will be collected, and how it will be used and stored.
  - **7.3.3** Informed consent must be obtained from the child and/or vulnerable adult before collecting or sharing his or her information. If the child is not old enough to provide informed consent, where possible this should be sought from the child's caregiver. If the vulnerable adult is not able to provide informed consent, where possible this should be sought from the vulnerable adult's caregiver.
  - **7.3.4** Survivor Alliance Representatives must only collect information that is necessary and/or that the child and/or the vulnerable adult wants to provide.
  - 7.3.5 Information collected about children and/or vulnerable adults must only be shared with others on a

need-to-know basis and must only be shared when it is in the best interests of the child and/or the vulnerable adult.

- **7.3.6** Information should be collected, stored, and shared in accordance with applicable laws, including applicable data security and privacy laws.
- **7.3.7** Information collected about children must be stored in a way that complies with *Standard 5* of the *Minimum Standards for Child Protection in Humanitarian Settings.*

## 8. Reporting and Response

The Survivor Alliance is committed to ensuring that allegations of violations of the Child and Vulnerable Adult Safeguarding Policy are reported, investigated, and responded to in a timely, fair, transparent, and consistent manner.

- **8.1** Beneficiaries shall be informed, to the extent possible, of the Survivor Alliance's commitments to children and vulnerable adults under the Child and Vulnerable Adult Safeguarding Policy and shall be informed of how to report suspected violations of these commitments. Local reporting mechanisms may vary based on the context, but beneficiaries shall always be informed that violations can be reported by filling in an anonymous complaint form that can be downloaded from this webpage: https://www.survivoralliance.org/survivors-1
- **8.2** Survivor Alliance Representatives are required to report and record allegations of violations of this policy in accordance with this Child and Vulnerable Adult Safeguarding Policy, Survivor Alliance's Complaints Mechanism. All reports shall be dealt with in accordance with Survivor Alliance's Complaints Mechanism Policy. The safeguarding reporting form and procedure for Survivor Alliance staff can be found at Annex 2.
- **8.3** Investigation of violations of the Child and Vulnerable Adult Safeguarding Policy shall be made in accordance with Survivor Alliance's Complaints Mechanism on Annex 1.
- **8.4** Failure of Survivor Alliance Workers to uphold or comply with the Child and Vulnerable Adult Safeguarding Policy is grounds for disciplinary action up to and including termination of employment or contract. Disciplinary action will be determined in accordance with Survivor Alliance's Employee Handbook.
- **8.5** Suppliers/Subcontractors, and Implementing Partners who have direct contact with children and/or vulnerable adults must be informed of the pathways for reporting violations of the Child and Vulnerable Adult Safeguarding Policy, or must agree upon other reporting processes. Any complaints or concerns should be reported by sending an email to <a href="minh@survivoralliance.org">minh@survivoralliance.org</a> and Kristen Abrams, Board Member, <a href="minh@survivoralliance.org">kristen.L.Abrams@asu.edu</a>.
- **8.6** Violations of the child and vulnerable adult safeguarding expectations outlined in contracts, agreements, or MoUs with Suppliers/Subcontractors or Implementing Partners shall be grounds for termination of contract or agreement.

## 9. Compliance with Donor Requirements

Survivor Alliance is committed to making all efforts to ensure that Survivor Alliance and our Subcontractors and Implementing Partners comply with the child and vulnerable adult protection/safeguarding policy requirements set forth by donors.

- **9.1** Where donors require child and vulnerable adult safeguarding measures that exceed those outlined in the Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy, relevant Survivor Alliance departments, units, and programs must comply with those measures.
- **9.2** Workers, Suppliers/Subcontractors, and Implementing Partners who have direct contact with children and/or vulnerable adults through projects implemented or financially supported by Survivor Alliance must agree to comply with the child and vulnerable adult protection/safeguarding policy requirements set forth by both donors and Survivor Alliance for that project. These requirements shall be clearly outlined in Survivor Alliance contractual agreements with Workers, Suppliers/Subcontractors, and Implementing Partners.
- **9.3** Where a potential Supplier/Subcontractor or Implementing Partner has direct contact with children and/or vulnerable adults through projects implemented or financially supported by Survivor Alliance and does not have a child and vulnerable adult protection/safeguarding policy in place and/or is not able to meet the child and vulnerable adult protection/safeguarding policy requirements set forth by donors, the Survivor Alliance will, where possible, work with the Supplier/Subcontractor or Implementing Partner by providing the support required to enable them to come into compliance.

## 10. Management

The Survivor Alliance is committed to putting in place a clearly defined management structure to ensure coordinated and consistent implementation and monitoring of this policy throughout the organization. **10.1** Survivor Alliance's Executive Director, along with the Deputy Director and Senior Leadership responsible for implementation of programs need to ensure implementation and monitoring of Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy.

Their responsibility includes:

- **10.1.1** Responding to reports of child and/or vulnerable adult exploitation and abuse, and policy non-compliance.
- **10.1.2** Monitoring implementation of and compliance with this policy.
- **10.1.3** Ensuring that Survivor Alliance Representatives receive information on this policy. **10.1.4** Reviewing this policy every two years.
- **10.1.5** Providing supervision and support to the senior management on monitoring implementation of this policy.

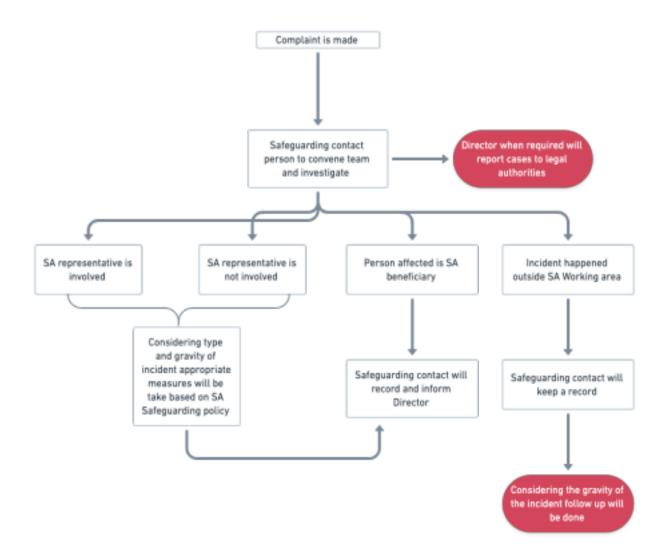
## 10.2 Senior Management are responsible for:

- **10.2.1** Ensuring that Survivor Alliance Representatives are familiar with Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy and are aware of their responsibilities in relation to this policy. **10.2.2** Working in collaboration with Survivor Alliance's Executive Director and Deputy Director on policy implementation and compliance within their office or program.
- **10.2.3** Ensuring that supervisors can receive, record, report, and respond to allegations of exploitation or abuse, including of children and/or vulnerable adults.
- **10.2.4** Reporting alleged, suspected, or confirmed violations of the Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy.
- 10.3 In general, department heads and supervisors are responsible for:
- **10.3.1** Ensuring that staff under their supervision comply with Survivor Alliance's Child and Vulnerable Adult Safeguarding Policy.
- **10.3.2** Reporting and responding to reports of policy violations in accordance with this Child and Vulnerable Adult Safeguarding Policy.

# **APPENDIX 1**



# **Safeguarding Reporting Flow Chart**



## **APPENDIX 2**



## **Documenting a Safeguarding Complaint**

## Procedure to be followed:

- 1. Staff member who receives an allegation will carefully listen and record the complaint. He/she checks that the written record accurately states what was reported.
- 2. Record the time, date, location (or if the matter has been communicated by the letter or telephone), and persons present. (Use the sample child/vulnerable adult protection form provided). The record should be signed and dated by the author. The record would also normally include:
  - a. Accurate identifying information as far as it is known. This should include the name and address of the person has raised the concern (as well as their date of birth, and parent/guardians/names and addresses where the person who has raised a concern/ allegation is a child)
  - b. The name of the individual whom the concern/ allegation is being raised and any other identifying information.
  - c. As much information as possible about the circumstance that led to the concern/allegation being raised, why is the person worried about the welfare and safety of the child/ children
  - d. Dates when the concern arose or when the incidence(s) occurred
  - e. Circumstance in which the incidence arose or when the incidence(s) occurred
  - f. Any explanations offered to account for the risk, injury, or concern
  - g. The affected person's own statement using the words they used to describe the events or incidence(s), if possible. Do not make assumptions about the intended meaning of the words used.
  - h. Details of any action already taken about the incidence/concern or allegation
  - i. Any views expressed by the child's parent(s) or guardian(s) about the matter, if relevant. j. The staff member should not be selective but include details which may seem irrelevant. It may prove invaluable at a later stage in an investigation
- 3. Explain to the person raising the concern what will happen next, indicate who will be made aware of the information given by them. Leave contact details of the designated person in case the referrer needs to ask questions later.
- 4. Pass all original records, including rough notes to the designated person immediately. Any copies of records retained must be kept secure and confidential.
- 5. Not all persons raising a concern would wish to go through this process. Nonetheless, information about the existence of a potential case must be communicated to the designated person.
- 6. In case of emergency, where the child or vulnerable adult appears to be at immediate and serious risk, an immediate report should be made to 911 and/or the National Human Trafficking Hotline 1-888-3737-888, as well as to the designated person. Consideration should in all cases also be given as to whether an immediate referral is necessary to preserve and safeguard against the possibility of any loss, deterioration, or destruction of potential evidence. Under no circumstance should a child/vulnerable adult be left in a dangerous situation pending the intervention of the relevant authority.

# **APPENDIX 3**



# **Child /Vulnerable Adult Protection Recording Form**

1. About the disclosure/concern	
Date of disclosure:	
Time of disclosure/ concern:	
How was information received? (Telephone, letter, mail, letter, in person?)	_
Attach any written information to this form.	
2. Details of persons making disclosure	
Name:	
Address:	
Mobile no:	
Email:	
Relationship to alleged victim:	
3. Details of alleged victim	
Name:	
Address:	
Mobile no:	
Email:	
Ethnic origin:	
Ethnic origin:  Language(if interpreter is needed):	
Language(if interpreter is needed):  Disability needs:	
Language(if interpreter is needed):  Disability needs:  4. Parent/Caregiver/Next of kin details (where appropriate)	

Email:

Yes No	
5. Details of alleged perpetrator	
Name:	-
Address:	
Mobile no:	_
Email:	_
Relationship with victim:	
Position at Survivor Alliance:	
Address at the time of alleged incident:	
Current contact with alleged victim	-
Additional information:	<u> </u>
6. Details of concern or complaint  Include dates/times and location of the incident (s) occurred, witnesse know this referral is being made?	es if known. Does the child/vulnerable adult
7. Action taken	
Has the matter been reported to civil authorities?	
Yes No	
If yes:	
Date:	
Time:	
Additional details:	
If the case was not reported, why wasn't it reported?	
Was the case referred? If yes, who was it referred to?	
Name:	
Designation:	

Are they aware of the details of the complaint?

Address:

Mobile no:	
Email:	
Has the matter been referred to the Survivor Alliance Ex	ecutive Director?
Yes No	
If yes:	
Date:	
Time:	
If not, why?	
8. Next steps  • What actions were agreed and by whom when th	e matter was referred to civil/ Survivor Alliance authority?
<ul> <li>Are there any immediate child protection concerr have been taken by whom to address them:</li> </ul>	ns? If so please record what they are and state what actions
9. Designated person details	
Date sent:	
Details of the person completing the form  Name:	
Address:	
Mobile no:	
Email:	_
Position:	
Form Completed:	
Date:	_
Time:	_
Place:	_

(A copy must be retained by the recipient and filed in a secure location, and a copy must be sent to designated officer and civil/ statutory authorities)

# **APPENDIX 4**

**Sample Training Workshop Topics** 

Target Group	Duration	Content of Workshop	Aims/Objective
Staff (Survivor Alliance)	60 minutes	Introducing safeguarding	-Define Safeguarding -Understanding safeguarding in Survivor Alliance's context
Staff (Survivor Alliance)	90 minutes	Looking at Safeguarding in relation to Survivor Alliance's values	-Translating values, procedures, and processes in relation to safeguarding issues
Staff (Survivor Alliance)	90 minutes	-Necessary foundations -Appropriate behavior for staff	-Understand the importance of the 6 foundation stones/ principles (a child rights-based approach, consultation, ownership, confidentiality, and sensitivity) to developing and implementing safeguarding policies and procedures
Staff (Survivor Alliance)	90 minutes	Learning from the field	-Evaluating common safeguarding issues -Lessons learned from dealing with safeguarding complaints -Creating awareness about safeguarding processes within the organization and outside
Staff (Survivor Alliance)	90 minutes	Trauma informed workplaces and safeguarding	-Trauma literacy -Trauma informed practices in action -Self-care
Staff (Survivor Alliance)	90 minutes	Monitoring and evaluation	-Importance of M&E of safeguarding policies
Staff and Beneficiaries (Survivor Alliance)	90 minutes	Data protection and cyber security	-Understand GDPR basics -Importance of software updates -Working safely in public spaces
Beneficiaries (Survivor Alliance)	90 minutes	Survivor Alliance Grievance Mechanisms	-How to file a complaint -Roles and responsibilities -Reporting and documentation