



Safeguarding Policy (including Reporting Procedure)

POLICY CHANGE RECORD	
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Contents

Purpose	3
Context	3
What is safeguarding?	3
Scope	4
Policy Statement.....	4
Prevention	4
Reall’s responsibilities	4
Child safeguarding.....	5
Adult Safeguarding	5
Protection from sexual exploitation and abuse	5
Additional Obligations	5
Reporting	5
How to report a safeguarding concern.....	5
Response	6
Confidentiality	6
Associated policies	6
Glossary of Terms.....	6
Dealing with Safeguarding Reports	8
Introduction.....	8
Procedures	8
1 Report is received.....	8
2 Assess how to proceed with the report	8
3 Appoint roles and responsibilities for case management.....	9
4 Provide support to survivor where needed / requested.....	10
5 Assess any protection or security risks to stakeholders.....	10
6 Decide on next steps	10
7 Manage investigation if required	10
8 Reporting safeguarding incidences to the Charity Commission.....	11
9 Conclude the case	11
Appendix A: Safeguarding Incident Report Form – Recording a Disclosure.....	12

Purpose

The purpose of this policy is to protect people from harm that may be caused due to their coming into contact with Reall and its associates, and will address child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse.

It includes harm arising from:

- The conduct of colleague, or those representing or associated with Reall.
- The design and implementation of projects associated with Reall.

This policy sets out the commitments made by Reall, and informs colleague, board members, consultants, and partners, of Reall's expectations, and their responsibilities, in relation to safeguarding in its widest sense. It sets out the basis upon which we will make decisions, and the action we will take if notified of a safeguarding issue or event.

Reall will not tolerate sexually abusive or exploitative acts being perpetrated by our employees, partners, or anyone associated with the delivery of the business. Employees and managers are bound to uphold this policy and to report people or incidents that they believe contravene it. Reall managers have a duty to ensure that allegations of a safeguarding nature are properly investigated in line with Reall's Procedures for Dealing with Safeguarding Incidents and that appropriate disciplinary measures are taken.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Reall's Disciplinary Policy.
- Safeguarding concerns in the wider community not perpetrated by Reall colleague, board members, consultants, and partners.

All colleague and consultants must be made aware of this policy, which forms part of Reall's Colleague Handbook. As such, adherence to this policy forms part of every colleague and consultant's terms and conditions of employment or engagement.

Context

Reall works with partner organisations in countries across Africa and Asia to fund and support projects that provide poor people with decent homes and improved livelihood opportunities. We are not an organisation that provides overseas aid in areas of disaster or crisis, and we do not currently have employees who work long-term or permanently overseas. When colleagues travel to visit our partner organisations overseas, they do so for a week or two at a time, and this is primarily to review the work that our partners are carrying out with Reall's funds.

We do not work directly with children or vulnerable adults in any area of our work, either in the UK or overseas. Reall accepts that the programmes are to provide good quality, affordable housing for communities and that of course will include vulnerable adults and children.

As an organisation we understand that colleagues and partner staff could be in a position where safeguarding incidents could occur due to an unequal balance of power and as an organisation are committed to living up to our values and expect the same high standards from our partners. There can be no tolerance for the abuse of power, privilege, or trust within our organisations or in our work. We have an absolute duty to our colleagues, our supporters and above all, the people we seek to help to ensure we do everything in our power to prevent, detect and eradicate unacceptable behaviour.

What is safeguarding?

Safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

In our sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with Reall's colleagues, anyone working on Reall's behalf, or Reall's projects.

Further definitions relating to safeguarding are provided in the glossary below.

Scope

- All colleague contracted by Reall.
- Associated personnel whilst engaged with work or visits related to Reall, including, but not limited to, the following: board members, consultants, volunteers, contractors, programme visitors, including journalists, celebrities, and politicians.

Policy Statement

Reall believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation, or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect, and exploitation. Reall will not tolerate abuse and exploitation by colleagues, board members, consultants, volunteers, contractors, or other associated personnel (see above).

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

Our approach to safeguarding can only be effective if we undertake our work in a way that is consistent with organisational values and principles, as well as consistently following agreed procedures and policy, in order to demonstrate reliability and integrity, and to generate trust.

Safeguarding is not only a job for professionals who work directly with children and young people. As professionals, and more generally as citizens, we all have a duty to the youngest and most vulnerable members of our society. As such our key principle is that safeguarding is everybody's business, and therefore it's everybody's business to take action if they have suspicions or evidence of abuse, or other concerns about the welfare of anyone we come in contact with.

Reall is committed to addressing safeguarding throughout its work, through the three pillars of prevention, reporting, and response.

Prevention

Reall's responsibilities

Reall will:

- Ensure all colleague have access to, are familiar with, and know their responsibilities within, this policy within their probation period and before any travel is agreed.
- Expect partners to design and undertake all its projects and activities in a way that protects people from any risk of harm that may arise from their coming into contact with work associated with Reall. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement robust recruitment procedures when recruiting, managing, and deploying colleague, board members, and consultants.
- Ensure colleague receive training on safeguarding appropriate to their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Support all partners to receive adequate safeguarding training and awareness raising.

Child safeguarding

Reall colleagues, board members, consultants, partners, and other associated personnel (see Scope above) must not:

- Engage in sexual activity with anyone under the age of 18 regardless of national legal age of consent.
- Sexually abuse or exploit children.
- Subject a child to any abuse including physical, emotional, or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.

Adult Safeguarding

Reall colleague, board members, consultants, partners, and other associated personnel must not:

- Sexually abuse or exploit any adults.
- Subject any adults to physical, emotional, or psychological abuse, or neglect.

Protection from sexual exploitation and abuse

Reall colleague, board members, consultants, partners, and other associated personnel (see Scope above) must not:

- Exchange money, employment, goods, or services, for sexual activity. This includes any exchange of assistance that is due to project beneficiaries.
- Engage in any sexual relationships with project beneficiaries, since they are based on inherently unequal power dynamics.

Additional Obligations

Reall colleague and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by any Reall colleague member, board member, consultant, partner, or other associated personnel (see Scope above), to the appropriate colleague member.

Reporting

Reall will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to colleague and the communities we work with.

Any colleague reporting concerns or complaints through formal whistleblowing channels will be protected by Reall's Whistleblowing Policy.

Reall will also accept complaints from external sources such as members of the public, partners, householders, and official bodies.

How to report a safeguarding concern

Colleague members who have a complaint or concern relating to safeguarding should report it immediately to the Head of HR as the Designated Safeguarding Lead (DSL). If the colleague member does not feel comfortable reporting to the DSL, for example if that person is implicated in the concern, then they may report to the Board Safeguarding Champion.

Concerns may be sent to the confidential email address safeguarding@reall.net or you may speak directly to either person in those roles mentioned above. Colleague members who wish to raise a concern anonymously may do so by sending an anonymous email using an external gateway to the DSL.

Response

Reall will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations.

Reall will apply appropriate disciplinary measures to colleagues found to be in breach of policy.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will only be shared on a need-to-know basis and will be kept secure at all times.

Associated policies

All of the following can be found referenced in the Colleague Handbook or contained within Bamboo policy section:

- Disciplinary and Grievance Policies
- Code of Conduct
- Dignity at Work Statement
- Whistleblowing policy
- Standards of Performance and Behaviour at Work

Glossary of Terms

Beneficiary of Assistance - Someone who directly receives goods or services from Reall's projects. Note that misuse of power can also apply to the wider community that Reall serves, and can also include exploitation by giving the perception of being in a position of power.

Child - A person below the age of 18 years.

Harm - Psychological, physical, and any other infringement of an individual's rights.

Psychological harm - Emotional or psychological abuse, including, but not limited to, humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.

Protection from Sexual Exploitation and Abuse (PSEA) - The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by colleagues, board members, consultants, partners, and other associated personnel (see Scope above). The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Safeguarding - In the UK, safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

In our sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our colleague or programmes. Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse - The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation - The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically, from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor - The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience, and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult - Sometimes also referred to as vulnerable adult. A person who is, or may be, in need of care by reason of mental or other disability, age, or illness, and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Dealing with Safeguarding Reports

Introduction

This document sets out the procedures to be followed for dealing with reports of a breach of Reall's Safeguarding Policy, where the safeguarding violation is:

- Against colleagues or members of the public.
- Perpetrated by colleague, partners, or associated personnel.

Procedures

1 Report is received

Reports can reach Reall through various routes, but whether this is via structured formats such as a letter, e-mail, text, or via informal discussion or rumour, it is important that if a colleague sees or hears something that they think is a safeguarding concern, they should report this immediately to the Designated Safeguarding Lead (DSL), or Board Safeguarding Champion.

If a safeguarding concern is disclosed directly to a colleague, the person receiving the report should bear the following in mind:

- Listen.
- Empathise with the person.
- Ask who, when, where, what, but not why.
- Repeat / check your understanding of the situation.
- Report to an appropriate manager immediately.

The person receiving the report should then document the following information, using an Incident Report Form (See Appendix A):

- Name of person making report.
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above.
- Name(s) of alleged perpetrator(s).
- Description of incident(s).
- Dates(s), times(s), and location(s) of incident.

The person receiving the report should then forward this information to the DSL or Board Safeguarding Champion within 24 hours. If none of these are available, please report to one of the Directors or CEO.

Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information initially shared only with the people identified above and is limited to a need-to-know basis only. This includes senior management who might otherwise be appraised of a serious incident.

If the reporting colleagues manager is not satisfied that the incident is being handled appropriately, they have a right to escalate the report, either up the management line, to the Board, or to an external statutory body. The colleague member will be protected against any negative repercussions as a result of this report. See Reall's Whistle Blowing Policy.

2 Assess how to proceed with the report

- a. Reall will then appoint an Investigating Manager for handling this report - someone who is not involved in the case, and does not line manage anyone involved. This is likely to be Human Resources, but may be an appropriately trained manager within the organisation.
- b. Determine whether the report is to be taken forward:
 - Does the reported incident(s) represent a breach of safeguarding policy?
 - Is there sufficient information to follow up this report?

- c. If the reported incident does not represent a breach of Reall's Safeguarding Policy, but represents a safeguarding risk to others, the report should be referred through the appropriate channels if it is safe to do so.
- d. If there is insufficient information to follow up the report, and no way to ascertain this information (for example if the person making the report did not leave contact details), the report will be added to the safeguarding reporting log and filed in case further information comes to light and it can be of use in the future, and to look at any wider lesson learning we can take forward.
- e. If the report raises any concerns relating to children under the age of 18, **seek expert advice immediately** via the DSL. If at any point in the process of responding to the report, for example during an investigation, it becomes apparent that anyone involved is a child under the age of 18, the Decision Maker should immediately be informed and should seek expert advice before proceeding.
- f. If the decision is made to take the report forward, ensure that you have the relevant expertise and capacity to manage a safeguarding case. If you do not have this expertise in-house, seek immediate assistance, through external capacity if necessary, including legal advice.
- g. Clarify what, how, and with whom, information will be shared relating to this case. Confidentiality should be maintained at all times, and information shared on a need-to-know basis only. Decide which information needs to be shared with which stakeholder – information needs may be different. An overview of all reportable safeguarding incidents will be provided to the board at each meeting whilst protecting the identity of all involved.
- h. Check all obligations on informing relevant bodies when you receive a safeguarding report. These include, but are not limited to:
 - Funding organisations / Donors / SIDA / FCDO – concerns should be reported immediately by the Governance and Commercial Director, using the dedicated donor email addresses whilst protecting the identity of all involved.
 - Umbrella bodies / networks.
 - Statutory bodies (such as the Charity Commission in the UK).
 - Law Enforcement Bodies (legal advice both in the UK and in country must be sought prior to informing law enforcement bodies).
- i. Some of these may require you to inform them when you receive a report, others may require information on completion of the case, or annual top-line information on cases. When submitting information to any of these bodies, think through the confidentiality implications very carefully.

3 Appoint roles and responsibilities for case management

- a. If not already done so, appoint a Decision Maker for the case. The Decision Maker should be a senior colleague member, not implicated or involved in the case in any way.
- b. If the report alleges a serious safeguarding violation, you may wish to hold a case conference. This could include:
 - Decision Maker.
 - Person who received the report (such as the DSL, or manager).
 - Head of HR.
 - Board Champion.
 - Safeguarding adviser (or equivalent) if there is one.

Who will be involved will be decided on a case-by-case basis, but will include sufficient knowledge, skill and seniority to ensure such serious matters are investigated and handled correctly.

- c. The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders (see below).

4 Provide support to survivor where needed / requested

Provide appropriate support to the survivor(s) of safeguarding incidents. This should be provided as a duty of care even if the report has not yet been investigated. Support could include, but is not limited to:

- Psychosocial care or counselling (Reall has an Employee Assistance Programme but support will be assessed in each case)
- Medical assistance
- Protection or security assistance (for example being moved to a safe location) All decision-making on support should be led by the survivor.

5 Assess any protection or security risks to stakeholders

For reports relating to serious incidents: undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case and develop a mitigation plan if required.

Continue to update the risk assessment and plan on a regular basis throughout and after the case as required.

6 Decide on next steps

The Decision Maker decides the next steps. These could be (but are not limited to):

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation's remit)
- Investigation is required to gather further information
- Immediate disciplinary action if no further information needed
- Referral to relevant authorities

If the report concerns associated personnel (for example partners, contractors, consultants or suppliers), the decision-making process will be different.

Although associated personnel are not staff members, Reall has a duty of care to protect anyone who comes into contact with any aspect of our programme, from harm. We cannot follow disciplinary processes with individuals outside our organisation; however, decisions may be made for example to terminate a contract with a supplier based on the actions of their colleague and follow up should be made to determine actions taken by other organisations if involved. Referrals to all appropriate agencies will be made including where necessary reporting to law enforcement bodies.

7 Manage investigation if required

In some cases, depending on the nature of the report, Reall may choose an external investigator to carry out more detailed investigation work if needed or required. Make decision on outcome of investigation report

The Decision Maker makes a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for colleague misconduct.

If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities *unless this may pose a risk to anyone involved in the case*. In this case, the Decision Maker together with other senior colleague will need to decide to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

8 Reporting safeguarding incidences to the Charity Commission

Reporting safeguarding incidences to the Charity Commission

Any reporting to the Charity Commission will be carried out by an appropriate Director or designated colleague, who will simultaneously notify the Board.

Reall needs to make a report to the Commission if a serious safeguarding risk materialises. The Charity Commission defines this by any of the following:

- incidents of abuse or mistreatment, alleged or actual, of beneficiaries of the charity (adults or children) which have resulted in or risk significant harm to them and:
 - this happened while they were under the care of the charity
 - someone connected with the charity, for example a trustee, colleague or partner, was responsible for the abuse or mistreatment, alleged or actual.
- other incidents of abuse or mistreatment, alleged or actual, of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity's activities.
- breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm.

There is significant guidance for requirements to report to the Charity Commission at the following link: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>
<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

It is vital that consideration is given to the requirements to report to the Charity Commission with every incident and the decision is recorded.

When a decision has been made to report to the Charity Commission, this should be made via the following email address, and confidentiality should be maintained throughout:
RSI@charitycommission.gov.uk.

9 Conclude the case

It is important that at all stages everything is documented, and all decisions recorded clearly and confidentially.

Record anonymised data relating to the case to feed into organisational reporting requirements (e.g., serious incident reporting to Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases. This folder is managed by HR.

Appendix A: Safeguarding Incident Report Form - Recording a Disclosure

This document is to only be used to prompt discussion and capture information clearly and easily. Notes can be made separate to this in a supportive and mindful way then transferred to this document within a reasonable amount of time to ensure it is an accurate record.

If a safeguarding concern is disclosed directly to a member of colleague, the person receiving the report should bear the following in mind:

- Listen
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation
- Report to the appropriate colleague member (see below)

The person receiving the report should then document the following information:

Name of person making report to you	
Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above	
Name(s) of alleged perpetrator(s)	
Description of incident(s) (Continue on another sheet if necessary and attach it to this report)	
Dates(s), times(s) and location(s) of incident	
Your name as the person to whom the disclosure was made	
Date and time of disclosure	