



Date: 7th September 2020

Subject: Revised Vita Safeguarding Policy – Doc 11

Purpose: Submitted for Approval

Submitted By: Programmes Subcommittee

Overview: The Vita Programme Committee accepted the revised Vita Child and Vulnerable Adult Safeguarding Policy at their meeting last Thurs 3rd Sept and are recommending that the Board approve this policy at the upcoming Board Meeting on Thurs 10th Sept.



CHILD AND VULNERABLE ADULT SAFEGUARDING POLICY

Revised: July 2020

Date Approved by Vita Board:

Signed:

Dermot Byrne
Chair of Vita Board

Date: 10 September 2020

Signed:

John Weakliam
Vita CEO

Date: 10 September 2020

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Vita's Commitment to Safeguarding

Vita is committed to the safeguarding of the welfare of children and vulnerable adults, and to providing a safe environment at all times. Vita acknowledges the rights of children and vulnerable adults to be protected, treated with respect, listened to and have their views taken into consideration. Vita recognizes the vulnerability of adults who may be restricted in their capacity to guard themselves against harm. Accordingly, Vita seeks to ensure that vulnerable adults are protected.

This policy has been developed to reflect Vita's moral and legal obligations to uphold children's rights and those of vulnerable adults in all aspects of the organization's work. This policy strives to develop a protective culture within the organization in which all people are safe and protected. This policy is based on the following principles:

- All children and vulnerable adults have an equal right to safety from harm.
- Vita has a duty of care to children and vulnerable adults that we work with, are in contact with or who are impacted by our programmes and operations.
- All Vita staff, volunteers, Directors and affiliates have a responsibility to ensure the rights of children and vulnerable adults to protection from harm is upheld.
- Vita has a responsibility to ensure that external affiliates and guests, who come into contact with the communities Vita works with and amongst at the invitation of Vita, are familiar with this policy and comply with it.

Safeguarding Responsibilities

- The **Directors of Vita** have overall accountability for this policy and will ensure that Vita monitors and reviews its safeguarding measures and policy. As such, the Directors of Vita will:
 - i. Approve plans and actions for the implementation of the Vita safeguarding policy and ensure that management assigns appropriate resources for implementing this policy.
 - ii. Undertake a review of the policy every three years. This period of three years will commence from the approval and implementation of this policy.
- **Vita senior managers** have overall operational responsibility for ensuring best safeguarding practice within Vita and for overseeing the implementation of this policy. This includes (a) ensuring safeguarding considerations are established within their area of responsibility, (b) staff, volunteers, affiliates and guests within their area of responsibility are oriented towards this policy including:
 - i. New staff should receive orientation to the policy upon commencing work at Vita, and are required to sign an acknowledgement to uphold the policy as a condition of their contract or agreement to work.
 - ii. Affiliates and guests of Vita, who are interacting with children and adults whom Vita works with and amongst, should be oriented towards the policy prior to this contact, and provide a signed acknowledgement to the appropriate Vita Safeguarding Focal Person.
- Vita senior managers will also ensure that systems are in place for regular monitoring of Vita's safeguarding policy and procedures in terms of progress, performance and lessons learned i.e. Are safeguarding measures working?, How well are they working?

Vita Safeguarding Focal Persons

The role of Vita Safeguarding Focal Person (SFP) is established under this policy. The SFPs will provide leadership on the implementation of this policy and integration of safeguarding measures

throughout Vita. The SFPs will raise safeguarding awareness and promote safeguarding good practice in Vita and will act as a focal point for safeguarding concerns and disclosures.

Vita will appoint SFPs at different levels of the organisation including at Vita Country Office level. The Vita CEO has ultimate responsibility for the appointment of the SFPs in agreement with the respective Country Directors. SFPs must be provided with enough support and resources to carry out the role. This support includes relevant training that SFPs may require. SFPs will not be hindered from carrying out their role effectively and will not be penalized for implementing this policy.

Responsibilities of Vita Safeguarding Focal Persons:

The **Safeguarding Focal Persons** will have clearly defined designated responsibilities in line with the responsibilities outlined below.:

- The **Safeguarding Focal Person(s)**, with the support of senior management, is responsible for leading the development of country-appropriate policy that aligns with overall organizational policy and procedure, and meets or exceeds minimum behavior protocols.
- The **Safeguarding Focal Person(s)** is responsible for supporting programme staff to ensure effective, accessible, locally appropriate mechanisms are in place for community members and beneficiaries to raise any safeguarding concerns related to Vita staff, volunteers, affiliates and guests, and for supporting programme staff to assess, manage and mitigate safeguarding risks relating to specific projects.
- The **Safeguarding Focal Person(s)** has the mandate for direct access to the CEO should they have reason to believe that this policy is not being adequately or effectively upheld. Where, for any reason, the SFP considers it inappropriate to refer the matter to the CEO or Country Director, their concerns can be shared with to the designated Board contact per the Vita Protective Disclosure Policy.

All, staff, Board members, volunteers, affiliates and guests are expected to comply with this policy and associated policies, and report and respond to safeguarding concerns and breaches in line with the applicable procedures.

Safeguarding in Programming

Vita recognizes there is a need to proactively assess, manage and mitigate the risk of harm to children and vulnerable adults in our programming. When appropriate, Programme staff will ensure that safeguarding is therefore mainstreamed into project design, alongside other cross-cutting themes, and periodically reviewed. While accepting that different types of programmes will require different risk assessments, guiding minimum standards are included in the Safeguarding section of Vita's Programme Quality Framework¹, including a "Do No Harm" framework². It is the responsibility of the Programme Quality Manager or equivalent to ensure safeguarding is mainstreamed effectively throughout the project cycle, supported by the Safeguarding Focal Person.

¹ To be developed by August 2020

² To be developed by August 2020, as applied to the thematic sectors we operate in

Safeguarding and Vita Partners

All Vita partners must commit to keep children and other vulnerable persons safe. Vita and its partners should reach and agree on how we will support each other to achieve compliance and competence around child and vulnerable adult safeguarding.

Safeguarding in Communications

Vita is committed to respecting the rights and dignity of children and vulnerable adults at risk in all communications, including:

- Obtaining informed consent from the child, adult, or parent/guardian before taking and publishing images. Informed consent means the person/people in the photo has a general understanding of why the photo is being taken and how it will be used, and gives verbal or written permission thereof. Written permission is preferable but where this is not feasible informed verbal consent is acceptable.
- Only using images and personal information in fundraising, marketing and communications work in ways that portray children and adults with dignity and safeguard their rights.
- Vita is a signatory to the Dóchas Code of Conduct on Images and Messages.³

Safeguarding in Recruitment

Vita is committed to taking appropriate steps during recruitment and selection of employees, volunteers and other representatives to ensure safeguarding issues are considered and addressed. This includes:

Job advertisements: All job advertisements should include a note that highlights Vita's commitment to safeguard children and other vulnerable persons and implements a Child & Vulnerable Adult Safeguarding Policy to support this.

Job descriptions: Safeguarding of children and vulnerable adults should be referenced in all job descriptions and applies to all staff, volunteers, affiliates and guests.

Interviews: All interviews should include a discussion on safeguarding of children and vulnerable adults, the candidate's understanding of this and Vita's commitment. It is not expected that candidate would have an in-depth knowledge of safeguarding, unless it is a specific requirement of the role. However, it is important that all candidates are aware of Vita's commitment to safeguarding.

Reference Checks: A thorough check of employment references is carried for the selected candidate and should include the following question: "Vita aims to keep all people involved in our work safe from harm and abuse – is there any reason why this person would be unsuitable to work with children or adults who may be vulnerable?".

Contract: This policy, a safeguarding acknowledgment form and (where relevant) Vetting Form are attached to all contracts and sent to all new employees or representatives before commencing work with Vita.

³ https://dochas.ie/sites/default/files/Images_and_Messages.pdf

Vita Behaviour Protocol

Vita staff, Board members, volunteers, affiliates, and guests are expected to behave in ways that protect children and adults, prevent exploitation and abuse, and prevent any harm whether intentional or unintentional. Vita staff, Board members, volunteers, affiliates and guests are expected to behave appropriately when interacting with children, members of the opposite sex, vulnerable adults and all people whom Vita works with and amongst and follow the minimum standards in the Vita Behaviour Protocol. All persons interacting with children and adults whom Vita works with and amongst at the invitation of Vita are expected to study this policy and provide a signed acknowledgement that they will uphold this policy, including the following behaviour protocols. The guidelines below are *minimum standards* and are not exhaustive; they will be periodically reviewed by Safeguarding Focal Persons, along with the wider safeguarding policy, to ensure conduciveness to evolving social, cultural and legal contexts in each country.

Acceptable Behaviours

- Accept responsibility for their behaviour as representatives of Vita.
- Treat all children and adults in a manner which is respectful of their rights, dignity and integrity.
- Respect the privacy and confidentiality of children and young people that Vita works with and amongst.
- Be conscious of the perception and appearance of their behaviour in their interactions with children and adults, both in person and online, demonstrating a respect for their rights and dignity.
- Always follow the “two adult” rule when conducting Vita business, ensuring two or more adults are visible and present at all times when conducting activities with children. The only exceptions to the “two adult” rule is if a child is in immediate danger and you are the only adult that can assist e.g. if a child has an accident and he/she needs to be driven to medical assistance.
- Remain accountable for their responses to the behaviour of a child or vulnerable adult, even if a child or vulnerable adult behaves in an inappropriate manner.
- Use positive, non-violent approaches to managing children’s behaviour.
- Comply fully with any internal or external investigations related to safeguarding.
- Comply with any applicable legislation and guidelines (internal and external) in relation to data privacy when handling data about individual beneficiaries.
- Create and maintain a culture of openness and mutual accountability in which the rights of children and vulnerable adults are respected, and effective action can be taken to prevent and respond to harmful behaviour.
- Ensure the design and implementation of Vita programmes and processes do not intentionally/unintentionally risk violation of this policy.

Unacceptable behaviours

- Abuse or exploit a child or vulnerable person or behave in a way that places them at risk of harm.
- Behave in an inappropriate physical or sexual manner or develop a sexual relationship with a child (under 18 years old), regardless of country-specific legislation. Mistaken belief in the age of a child is not a defence.
- Fondle, hold, kiss or touch children or adults in an inappropriate and culturally insensitive way.
- Use language, offer advice or suggestions, or behave in a manner towards a child or adult that is inappropriate, belittling or causes shame and humiliation.

- Use physical punishment/discipline or use of physical force to manage the behaviour of a child or vulnerable adult.
- Disrespect the privacy and confidentiality of children and adults whom Vita works with and amongst. This includes:
 - a. asking for, initiating or accepting invitations to share personal contact details with children,
 - b. taking photos of children and adults without checking with Vita staff that it is appropriate to take pictures in the context, and requesting the consent of the children and adult (or in the case of young children, their parent or guardian),
 - c. take photos that impact negatively on or are disrespectful to the dignity and privacy of the individual(s)
- Communicate with a child online or via digital platforms without the consent and knowledge of their parents/guardian
- Exchange money, employment, goods and services for sexual or other exploitative demands
- Offer or imply that favours will ensure inclusion in programme activities, or access to services, goods or other supports and assistance.

When to report a safeguarding concern?

Reporting a safeguarding concern is required when:

- (a) an allegation of abuse⁴ is made
- (b) a case of abuse is either witnessed or suspected
- (c) A child or vulnerable adult discloses incidence of abuse

How to report a safeguarding concern?

The in-country Vita Safeguarding Focal Person is responsible for providing safeguarding support and advice within the organisation. If you have a suspicion, concern, allegation or disclosure of abuse then it is your responsibility to record the matter in the official Vita Safeguarding Incident Recording Form and share with the Vita Safeguarding Focal Person without delay, including any supplementary information which could be considered of importance (Appendix 1). A copy of the recording form must be passed on to the national children and family services at the earliest possible opportunity. If the child is considered to be at immediate risk of continued abuse or neglect, the relevant statutory authority should be contacted, and a report filed. All staff, consultants, volunteers and Directors have the responsibility of being familiar with and adhering to these procedures.

The best interest of the survivor will be the first priority throughout these procedures. Vita will link survivors of harm caused by staff or associated personnel to appropriate external support services where these services are available.

It is not the responsibility of Vita representatives to decide if an incidence of abuse has taken place or not, but it is their responsibility to pass their concerns about on. Vita has a responsibility to ensure complete confidentiality in this process and protect information relating to the party reporting, the party accused and the victim as appropriate.

⁴ Please refer to glossary for definition of the term “abuse” used in this policy

Guidance when a child or adult discloses an incidence of abuse or harm to Vita representatives

The “*Five Rs*” of safeguarding provide useful practical guidance in this scenario:

- **Receive:** Listen to any child or adult disclosing information regarding abuse. Accept what they say, indicate that you take it seriously, and try not to show shock
- **Reassure:** Reassure the individual that they were right to bring the matter to your attention. Acknowledge how difficult it must have been to tell you what happened. Don't promise confidentiality – you have a responsibility to refer information – and don't make promises about action that cannot be kept.
- **React:** Do not ask leading questions or for further details – react only as far as is necessary in order to establish whether the matter requires referral or not. Explain what you need to do next or who you must talk to, and that you will only discuss the situation with the appropriate individuals on a “need to know” basis.
- **Record:** Make some brief notes and write them up as soon as possible using the suggested template. Ensure time, location, personnel and what was said is recorded. Don't include assumptions and personal interpretations in your recording of what was said.
- **Refer:** Refer the matter through the appropriate channels as quickly as possible and in a manner that is fully compliant with local child protection laws.

Monitoring and Review of this policy

A regular review of safeguarding policies and procedures is necessary to ensure implementation and efficiency. This policy will be reviewed every three years, or when it is shown that review is necessary to address additional issues, such as issues arising from a significant change in context, programme focus or legislation. The policy review should also include learning from any cases if they arise. The Directors of Vita will undertake a review of the policy every three years. Vita senior management are responsible for facilitating this review.

Associated policies

- Protected Disclosures Policy
- Dignity at Work Policy
- Vita HR Manual

Definitions/Glossary

Term	Definition
Safeguarding	Preventing, reporting and responding to abuse or harm of any kind to children and adults by Vita employees, affiliates and guests
Affiliates and Guests	Any individual external to Vita (with the exception of government officials and institutional donors) that is interacting, at the invitation of Vita, with children and adults whom Vita works with and amongst. Examples of affiliates include external consultants and contractors hired by Vita.
Child	Any person below the age of 18. Vita identifies a child as any person under the age of 18. This definition applies to all children, without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth

	or other status. This is in line with the UN Convention on the Rights of the Child ⁵
Safeguarding Focal Person (SFP)	Vita staff member(s) with designated responsibilities related to safeguarding including: to lead implementation of this policy and to be the first point of contact in relation to safeguarding concerns. NB: The responsibility to prevent and respond to exploitation and abuse is shared. It is incorrect to think that the person named as Safeguarding Focal Point is the only person with responsibility for safeguarding children and vulnerable adults.
Safeguarding	The responsibility of the organisation in preventing, reporting and responding to abuse or harm of any kind to children and vulnerable adults by Vita employees, affiliates and guests
Sexual abuse	An actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another
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.
Violence	Includes all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill treatment or psychological violence, sexual abuse and exploitation, harassment, and any other commercial or other exploitation of a child or vulnerable adult. Acts of violence can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a child or young person. Violence consists of anything which individuals, groups, institutions or organizations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child or young person's wellbeing, dignity and survival and development.
Vulnerable Adult	Adults who may be vulnerable are those who may be restricted in their capacity to guard themselves against harm or exploitation, possibly as a result of illness, dementia, mental health problems, physical disability or intellectual disability ⁶

Appendix 1: Safeguarding Incident Recording Form

1. Date of disclosure/concern	
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2. DETAILS OF PERSON MAKING DISCLOSURE / RAISING CONCERN TO YOU

First Name		Family name	
Address		Organisation	
		Position Held	
		Phone Number	
Email			

⁵ <https://www.gov.ie/en/publication/a1481d-united-nations-convention-on-the-rights-of-the-child/>

⁶ Department of Social Welfare, 2016

Relationship to Child/Victim	
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3. DETAILS OF CHILD OR ALLEGED VICTIM

First name		Family name	
Male	<input type="checkbox"/>	Female	<input type="checkbox"/>
Address		Date of birth	
		Estimated age	
Phone number			

4. DETAILS OF CONCERN/DISCLOSURE (Please include the parents and child’s view, if known. Please attach additional sheets if necessary.)

Date of incident	
Location of incident	
Were there any witnesses? (Who? How many? etc.)	
Details of the incident	
Does the child/alleged victim know the referral is being made? (Be clear that you cannot promise confidentiality, particularly to a child)	

5. TYPE OF CONCERN

Physical Abuse	<input type="checkbox"/>	Sexual Abuse	<input type="checkbox"/>
Exploitation	<input type="checkbox"/>	Emotional Abuse	<input type="checkbox"/>
Neglect	<input type="checkbox"/>	General Child Welfare Concern	<input type="checkbox"/>

6. PARENTS/GUARDIANS AWARE OF THE REPORT DETAILS (if alleged victim is a child)

Are the parent/parents aware that a concern has been reported?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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7. PARTNER/GUARDIAN DETAILS (Where appropriate)

Details of Mother			
First Name		Family name	
Address (if different for above)		Phone number	

Details of Father			
First Name		Family name	
Address (if different for above)		Phone number	

8. DETAILS OF PERSON(S) ALLEGEDLY CAUSING HARM

First name		Family name	
Male	<input type="checkbox"/>	Female	<input type="checkbox"/>
Address		Date of Birth	
		Estimated Age	
		Phone number	
Job Title		Organisation	
Relationship to Child/Victim			
Address at time of alleged incident(s)			
Current contact with children if known (e.g. sits on board of school, teaches children, runs youth groups etc.)			
Any additional information			

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8. ACTION TAKEN

Has the matter been referred to the relevant authorities?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If Yes, Date of Referral				
If No, explain why				
Who was it referred to? (Give name and position held)				
Address				
Phone number				
Has the matter been referred to Vita or a Vita partner?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If Yes, Date of Referral				
Who was it referred to? (Give name and position held)				
Address				
Phone number				
Email address				

9. NEXT STEPS

What actions were agreed and by whom when the matter was referred onto the relevant authorities/Vita/a Vita partner	
Are there any immediate child protection concerns? If so, please record what they are and state what actions have been taken and by whom.	

10. DETAILS OF PERSON COMPLETING THE FORM

First name		Family name	
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Address		Phone Number	
		Email	
		Job title	
Date of form completion			
Date of form sent to Vita Designated Safeguarding Officer			
Signature			

Appendix 2: Vita Safeguarding Focal Persons

VITA SAFEGUARDING FOCAL PERSON, VITA ETHIOPIA COUNTRY OFFICE

Name: Mr. Akalu Gebreyes

Address: Vita, House No. B41_21 Gurd Sholla, Woreda 12, Yeka Sub City, Addis Ababa, Ethiopia

VITA SAFEGUARDING FOCAL PERSON, VITA ERITREA COUNTRY OFFICE

Name: Ms. Worku Zerai

Address: Vita, Raza Building, Martyr's Avenue / Samaetat Avenue, Asmara, Eritrea

VITA SAFEGUARDING FOCAL PERSON, VITA DUBLIN OFFICE

Name: Ms. Emily Hosford

Address: Vita, Equity House, 16 -17 Upper Ormond Quay, Dublin 7, Ireland