

Policy	Safeguarding Policy
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**If in doubt about anything in this policy, please seek further advice from CAFOD's
Safeguarding Team (safeguarding@cafod.org.uk)**

Contents

1. POLICY STATEMENT	3
1.1 Key Safeguarding Principles	3
2. LEGAL COMPLIANCE	4
3. RISK STATEMENT	4
4. DEFINITIONS	5
5. POLICY SCOPE	7
6. POLICY DETAIL: PROTOCOLS FOR SAFEGUARDING	7
6.1 CAFOD’s Code of Conduct	7
6.2 Additional commitments for contact with children	8
6.3 Additional commitments for contact with vulnerable (at-risk) adults in the UK.....	9
6.4 Additional commitments for contact with vulnerable adult volunteers	9
6.5 Obligation to report	9
7. POLICY DETAIL: SAFE RECRUITMENT.....	10
7.1 Additional requirements for recruiting vulnerable adult volunteers	10
8. POLICY DETAIL: SAFEGUARDING ROLES & RESPONSIBILITIES	11
9. POLICY DETAIL: SAFEGUARDING & SHARING DATA AND INFORMATION	11
10. APPLYING CAFOD POLICY COMMITMENTS IN INTERNATIONAL PARTNERSHIPS	12
11. REPORTING & MANAGING SAFEGUARDING CONCERNS OR ALLEGATIONS	13
11.1 How to report.....	13
11.2 CAFOD procedure: how issues are handled – See Annex 2	14
11.3 Notifying authorities or other organisations	14
11.4 Support to survivors of sexual exploitation and abuse	15
12. POLICY DISSEMINATION AND TRAINING.....	16
13. COMPLIANCE WITH POLICY	17
14. TRUSTEES RESPONSIBILITIES	17
15. RELATED POLICIES, PROCEDURES, FORMS, GUIDELINES & OTHER RESOURCES	17
16. ANNEX 1: Guidance on responding to a direct disclosure	18
17. ANNEX 2: CAFOD Safeguarding Case Management Procedure	19
18. ANNEX 3: Safeguarding Incident Report Form.....	20

1. POLICY STATEMENT

In fulfilling its mission, CAFOD upholds its values and high standards of professional and personal conduct. Our [Values](#) commit us to respect the intrinsic dignity of every person and create relationships of mutual respect with all people, regardless of race, gender, religion, sexual orientation, age, ability or beliefs. We aim to remove barriers to inclusion and prioritise the perspectives and needs of the most vulnerable and the excluded as the foundation for building positive change.

We recognise that the nature of our work with some of the most vulnerable and marginalised communities, and the resources we have access to, can create unequal power dynamics. This means there is risk that someone who carries out work for, or represents, CAFOD ('Our Representatives') or our partners might exploit that position of power. CAFOD is committed to safeguarding all people in the course of our work but recognises the need for particular attention to ensure the welfare of children and adults with specific vulnerabilities and to ensure that action is taken to support them if they are at risk of significant harm. In an international context this may include individuals who are reliant on humanitarian aid, or members of marginalised groups who face exclusion due to overlapping social identities and experiences that may lead to prejudice or inequality.

Our [Code of Conduct](#) makes explicit commitments that the personal and professional conduct of 'Our Representatives' is, and is seen to be, of the highest standard. It strongly condemns all kinds of abuse and exploitation, including sexual exploitation and abuse, and makes clear CAFOD will not tolerate any form of this behaviour. We commit to work only with organisations (partners, suppliers and service providers, including consultants) who are equally committed to the dignity of individuals and vigilant about preventing and addressing harassment, abuse and exploitation and trafficking.

The purpose of this Safeguarding Policy and its related procedures is to create an environment where all individuals, especially children, vulnerable adults and other programme participants are protected from any harm resulting from engagement with CAFOD's programmes, operations, and people. This includes abuse or neglect arising from:

- The conduct of Our Representatives or partners
- Uncontrolled inherent risks in the design and implementation of CAFOD's programmes and activities

1.1 Key Safeguarding Principles

Shared responsibility:

- Safeguarding is a shared responsibility, with all parts of the organisation and all levels of staff involved in ensuring a welcoming, safe, dignified and inclusive environment for those who come into contact with us.
- All partners must share our commitment to safeguarding and we have a responsibility to help them meet minimum standards.
- All CAFOD representatives have a responsibility to act when there is a perceived or actual breach of our Safeguarding Policy or Code of Conduct and/or a risk of harm to children or vulnerable adults. Anyone who brings concerns or allegations to the notice of CAFOD will be responded to sensitively, respectfully and seriously.

Survivor-centred

- The best interest of the child/survivor is the primary consideration in all safeguarding matters.
- Confidentiality is paramount and information relating to safeguarding concerns or allegations will only be shared on a need-to-know basis.

- Support will be made available to survivors where there have been concerns or allegations of harm or maltreatment by a CAFOD representative.

Zero tolerance to inaction

- All reported concerns or allegations about breaches of CAFOD's Safeguarding Policy or Code of Conduct will be investigated in accordance with the relevant policy and procedure(s).
- CAFOD is committed to holding perpetrators to account. Sexual exploitation and abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures for staff, including dismissal.

2. LEGAL COMPLIANCE

CAFOD complies with all relevant safeguarding legislation in England and Wales, including Working Together to Safeguard Children 2023; The Children Act 1989 / Children Act 2004.

Each international country has its own specific legislative requirements relating to safeguarding, such as criminal law, recruitment vetting processes, data protection and reporting protocols. If circumstances arise where this policy contravenes or contradicts local legislation, local legislation must be followed with guidance from the Head of Safeguarding. This document will apply if CAFOD policy is more stringent than local legislation.

CAFOD safeguarding practices are guided by international standards such as the UN Convention on the Rights of the Child and other relevant Human Rights Conventions, the UN Secretary General's Bulletin for special measures for protection from sexual exploitation and sexual abuse; IASC (Inter-Agency Standing Committee) Minimum Operating Standards for Protection from Sexual Exploitation and Abuse, and the Core Humanitarian Standard on Quality and Accountability (CHS).

As an agency of the Catholic Bishops' Conference of England and Wales, CAFOD is also guided by the procedures of the Catholic safeguarding bodies in England and Wales. This policy is in line with the Caritas Internationalis Safeguarding Policy.

3. RISK STATEMENT

Due to the nature of our operations, there is a medium risk that 'Our Representatives' or our partners present a safeguarding risk to the communities we serve, particularly children and vulnerable adults. This policy aims to reduce the likelihood of this risk and ensure we respond to any safeguarding incidents appropriately without risk of further harm. At an organisational level the impact of any serious complaint is high, due to the potential for reputational damage and possible financial implications.

4. DEFINITIONS

The following is list of terms and definitions used in this policy and annexes:

Our Representatives include employed staff, volunteers, trustees, consultants and any other person who is asked or authorised to carry out work for, or represent, CAFOD.

A child is anyone under the age of 18. This is irrespective of local country definitions, including legal definitions, of when a child reaches adulthood.

Abuse: any action or inaction that causes harm to another person (see section below on obligation to report). It can include physical abuse, emotional abuse, sexual abuse and neglect. It also includes abuse online and/or through mobile technology.

Commercial exploitation: Exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

Complainant: The person who reports the concern or allegation. This may not be the same person as the survivor.

Discriminatory abuse: includes abuse based on an individual's race, gender, disability, faith, sexual orientation, or age; and other forms of harassment, slurs or similar treatment or hate crime/incident.

Domestic abuse: any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality (UK definition).

Emotional abuse: harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Exploitation: any actual or attempted abuse of a position of vulnerability, differential power or trust to profit monetarily, socially or politically. It includes sexual exploitation.

Grooming: when someone builds an emotional connection with a child or vulnerable adult to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Many children and vulnerable adults may not understand that they have been groomed or that what has happened to them is abuse.

Harmful traditional practices: Forms of violence based on long established patterns of action and behaviours which are accepted as part of the cultural practice in specific countries and contexts and are primarily committed against women and girls. Examples are female genital mutilation, child marriage, forced marriage, 'honour' based violence, female infanticide, dowry price.

Neglect and negligent treatment: allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's or vulnerable adult's basic physical and /or psychological needs, which is likely to result in serious impairment of a child's or vulnerable adult's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children or vulnerable adults from harm and provide for nutrition, shelter and safe living/working conditions.

Physical abuse: includes, but is not limited to, hitting, slapping, pushing, kicking, unlawful or inappropriate restraint and inappropriate physical sanctions.

Safeguarding: protecting people from harm that arises from coming into contact with our representatives or programmes. Harm includes (but is not limited to): sexual, physical or emotional harassment, exploitation or abuse. Safeguarding encompasses both child protection and Protection from Sexual Abuse & Exploitation (PSEA) measures.

Safeguarding concern or allegation: a suspicion or allegation that a breach of this safeguarding policy has occurred or may be at risk of occurring. This includes disclosures by children and vulnerable adults.

Sexual abuse: unwanted sexual activity or behaviour that happens without consent or understanding. The activities may involve physical contact, including assault by penetration (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse includes non-contact activities, such as involving the individual in looking at, including online and with mobile phones, or in the production of, pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

Sexual exploitation: a form of sexual abuse that involves children or vulnerable adults being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. The abusive relationship between survivors and perpetrator involves an imbalance of power where the survivor's options are limited. It is a form of abuse that can be misunderstood by children and vulnerable adults as consensual.

Sexual harassment: a term covering verbal, non-verbal, written or physical conduct which is sexual in nature, is unwelcomed, is unsolicited, is unreciprocated and offends, humiliates or intimidates the person at whom it is aimed. It occurs in circumstances whereby a reasonable person would have anticipated that the person harassed would be offended.

Survivor/victim: the term survivor refers to the person who it is alleged has been the subject of abuse or exploitation. The term 'survivor' implies strength and resilience. 'Victim' is used to mean the victim of an alleged perpetrator's actions. However, this is not

intended to negate the dignity and agency of an individual.

Trafficking: Trafficking is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Vulnerable adult: this policy recognises that every adult (person aged 18 years or over), including CAFOD staff and volunteers, could be subject to harm or exploitation based on their age, gender, sexual orientation, health, social or economic status as well as relationships of dependency and/ or hierarchy they are in. Specific vulnerability ('at-risk') is attributed to persons who are, or may be, in need of community care services by reason of mental or other disability, age or illness; and who are or may be unable to take care of themselves, or unable to protect themselves from the risk or experience of abuse or neglect.

Whistleblowing: specifically relates to concerns from CAFOD workers about serious malpractice or wrongdoing, the highlighting of which is in the public interest.

5. POLICY SCOPE

This policy **applies globally to 'Our Representatives' at all times.**

It covers our activities in England and Wales and internationally. The policy also sets out how we identify and respond to safeguarding concerns or allegations.

This policy **does not** cover safeguarding concerns in the wider community not perpetrated by CAFOD staff, representatives, or partners¹.

This policy **does not** cover bullying or harassment in the workplace which occurs when differences in power are abused between staff members of the same agency, even though these issues may be interrelated. These are governed by internal HR policies.

6. POLICY DETAIL: PROTOCOLS FOR SAFEGUARDING

Listed below are the commitments within CAFOD's overarching Code of Conduct that are most relevant to safeguarding. Note the Code of Conduct also applies to any online activity, including use of social media.

This section then includes additional commitments for direct work or contact with children and vulnerable adults.

Disciplinary action, up to and including termination of contract, will be taken against any of Our Representatives who do not follow the Safeguarding Policy and this Code of Conduct. This will apply for any breach, including if a representative:

- **Does not follow this Code of Conduct**
- **Fails to keep people safe from harm or abuse**
- **Fails to report incidents (whether suspected, alleged or witnessed)**
- **Fails to report any form of sexual exploitation or abuse by others**

6.1 CAFOD's Code of Conduct

'Our Representatives' must:

- Ensure their personal and professional conduct is, and is seen to be, of the highest standards and in keeping with CAFOD's Vision, Mission and Values and does not bring CAFOD into disrepute.
- Act in good faith and treat other people with dignity and respect, without discrimination, harassment, abuse or neglect.
- Take reasonable action to protect others from harm and to challenge infringements into the rights of others.
- Act in accordance with health, safety and security guidelines and endeavour to safeguard others.
- Ensure contact with children, young people and vulnerable adults (whether by phone, online or direct contact) is supervised, accompanied, or at least in sight of other adults. CAFOD recognises that situations may arise where this cannot be the case for urgent or for practical reasons. If

¹ Staff receive training on how to refer complaints or reports that do not fall within the scope of CAFOD to a relevant party in a manner consistent with good practice.

circumstances arise that where I am alone with a vulnerable adult or one or more children, I will inform my line manager ahead of time or as soon as possible.

'Our Representatives' must NOT:

- Use the position of power conferred by their role to exert pressure, gain economically, professionally or sexually, or extract or accept favours, bribes, gifts or other forms of personal enrichment.
- Enter into a sexual relationship with any member of a community or partner we assist with whom we are in a position of power or authority. Any sexual relationships arising which could potentially be perceived as an abuse of power or authority must be declared to their manager, HR contact or another manager in CAFOD.
- Exchange money, employment, goods or services for sex², including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes the exchange of sexual favours for assistance that is due to communities we assist or partners we work with.
- Use their position of power as a representative of CAFOD to enter into a relationship with a colleague.
- Work while under the influence of drug related substances or alcohol that inhibit the ability to perform duties.
- Use the organisation's computers or other equipment to view, download, create or distribute inappropriate material, including but not limited to pornography.
- Staff and associates are prohibited from engaging in trafficking in human beings, in all forms.

6.2 Additional commitments for contact with children

'Our Representatives' must:

- Encourage children and adults to feel comfortable enough to point out attitudes and behaviour they do not like and to know where and how to make a complaint where necessary
- Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse
- Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures

'Our Representatives' must NOT:

- Engage in any type of sexual relationship with any person under the age of 18 or under the local age of sexual consent (where higher). This applies to all 'Our Representatives' regardless of the age of consent locally or mistaken belief in the age of the child. Any disclosure that confirms contravention of this position will result in a job offer being withdrawn or if information becomes available at a later date, this may result in termination of contract.

² CAFOD's Code of Conduct strictly prohibits the exchange of sex for money. We do not make judgement about individuals who participate in selling sex in exchange for money or other goods ("transactional sex"). However, CAFOD has banned buying sex in order to prevent sexual exploitation and abuse from occurring, in line with the IASC Core Principles on Prevention of Sexual Exploitation and Abuse.

- Use physical punishment on children (even where this is culturally acceptable). ‘Our Representatives’ must use non-violent methods to manage children’s behaviour (both within and outside of the workplace).
- Do things of a personal nature for a child with whom they come into contact as part of their work for CAFOD that the child can do for themselves (e.g., toileting, bathing, dressing).
- Hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury
- Seek to make contact or spend time with any child with whom they come into contact as a part of their work with CAFOD except as part of the designated activities set out in the role.
- Share a bedroom or sleep close to an unsupervised child or children where that child/children are ones with whom they come into contact as part of their work for CAFOD, unless absolutely necessary, in which case the supervisor’s permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual’s own children)
- Invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger
- Use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- Never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium
- Show favour to particular children or adults to the exclusion of others

These behaviours are not intended to interfere with normal family interactions.

6.3 Additional commitments for contact with vulnerable (at-risk) adults in the UK

‘Our Representatives’ must act in accordance with CAFOD policies and with the Code of Fundraising Practice.

6.4 Additional commitments for contact with vulnerable adult volunteers

Effective supervision is critical to safeguard vulnerable adult volunteers. managers/supervisors must ensure that, unless previously agreed with the Head of Safeguarding and relevant Group Head:

- At least two adults are present when a vulnerable adult is volunteering, of which one is designated as the supervisor for the duration of the vulnerable adult’s time in the workplace
- Volunteers who are vulnerable are not be left alone in a property at any time during their volunteering hours

6.5 Obligation to report

‘Our Representatives’ have a mandatory duty to promptly report all concerns or allegations about breaches of organisational policies (including the Code of Conduct and this Safeguarding Policy). Anyone can report a concern or make a complaint to CAFOD about something they have experienced or witnessed. Regarding safeguarding concerns and complaints:

- ‘Our Representatives’ must immediately report all safeguarding concerns or allegations immediately, regardless of whether it is internal to CAFOD or not (see also Code of Conduct and

Complaints Policy). It is not the responsibility of staff to decide whether or not exploitation or abuse has occurred, but they must pass their concerns on. The need to report safeguarding concerns may arise when:

- You witness or suspect abuse or exploitation, or grooming type behaviour
 - You receive a concern, allegation, or complaint that indicates abuse or exploitation
 - A survivor discloses abuse or exploitation.
- Staff who fail to report a concern may be subject to disciplinary action in accordance with CAFOD's Disciplinary Policy. This does not apply to survivors, who can decide if, when, and how to report.
 - Although rare, deliberate false allegations are a serious disciplinary offence and will be investigated in accordance with CAFOD's disciplinary policy.
 - We manage safeguarding reports (and other complaints) in a manner that prioritises the safety of the complainant and those affected at all stages.

7. POLICY DETAIL: SAFE RECRUITMENT

CAFOD applies recruitment procedures that, to the best of our ability, ensure appointed representatives are suitable to work with children and vulnerable adults. CAFOD is signed up to the Inter-Agency Misconduct Disclosure Scheme and the Recruitment Toolkit, the CAFOD Volunteer Policy and Supply Chain Manual outline the safe recruitment procedures for engaging staff, volunteers and consultants respectively. Staff must follow the relevant procedure, as appropriate, to:

- Identify the safeguarding risk(s) of each role.
- Reflect safeguarding commitments and responsibilities in job adverts, role descriptions and terms of reference as applicable.
- Request confidential disclosure of convictions within the parameters of local employment law.
- Ask appropriate screening questions during selection/interview processes for relevant roles.
- Perform thorough background vetting checks confirming an applicant's employment history and undertaking reference checks in accordance with the Inter-Agency Misconduct Disclosure Scheme requirements and CAFOD's Reference Policy.
- Perform police checks as appropriate. For relevant UK staff and volunteer positions, CAFOD requires re-checks from the Disclosure and Barring Service (DBS) every 3 years. Any concerns must be escalated to the Head of Safeguarding in line with the Recruitment Policy.

7.1 Additional requirements for recruiting vulnerable adult volunteers

- If a face-to-face meeting takes place with a vulnerable adult, at least two CAFOD representatives should be present. The vulnerable adult should be made aware of CAFOD's Safeguarding Policy. For one-off campaigning or fundraising events, the vulnerable adult should be given a simplified format of CAFOD's Safeguarding Policy prior to volunteering.
- Managers/Supervisors must work with the Safeguarding Advisor to ensure all relevant risk assessments are completed and a support plan is in place before taking on a vulnerable adult volunteer.

CAFOD will not employ any member of staff or volunteer, where, during or upon recruitment, concerns arise in relation to CAFOD's duty to the protection of children and vulnerable adults. This is without prejudice because such concerns warrant resource-intensive investigation to determine whether or not

there is a risk. This applies to all representatives, since any role within CAFOD to some degree places the holder in a position of power which may be open to abuse. Where such concerns come to light in the course of someone's work with CAFOD, the Head of Safeguarding and/or Human Resources will determine the appropriate course of action.

8. POLICY DETAIL: SAFEGUARDING ROLES & RESPONSIBILITIES

While safeguarding is a shared responsibility, there are specific responsibilities within key roles:

- CAFOD's Corporate Safeguarding Officer is a member of CAFOD's Executive Team.
- The Head of Safeguarding and a Safeguarding Advisor provide safeguarding expertise to CAFOD to ensure that this Policy and associated systems and procedures are fit for purpose and that CAFOD representatives are supported in delivering a safe environment for all.
- Safeguarding Focal Points support the Safeguarding Team to:
 - prevent and respond to abuse and exploitation by receiving and forwarding concerns
 - develop safeguarding policies and procedures
 - raise awareness and promote best practice
 - provide advice to managers and staff
 - ensure that CAFOD keeps abreast of best practice in the sector and legislative changes.
- Managers have specific responsibilities to ensure that:
 - The Safeguarding Policy is implemented within their group/region/country/team as applicable; Country Representatives hold oversight of progress in safeguarding work with partners.
 - A focal person(s) for safeguarding is in place for each location where we work, and staff know who this individual or individuals are.
 - Staff undertake thorough and systematized safeguarding risk analysis for relevant activities (e.g., fundraising activities, advocacy initiatives, humanitarian and development projects) and create an action plan to minimise risks.
 - Any vulnerable adult volunteers in their section have supervision arrangements which are clearly set out and agreed in advance with each person who will supervise vulnerable adult volunteers.

9. POLICY DETAIL: SAFEGUARDING & SHARING DATA AND INFORMATION

CAFOD representatives must protect the personal data of children and vulnerable adults by processing and storing it in accordance with the General Data Protection Regulation (2018) and CAFOD's policies including CAFOD's Data Protection Policy, Social Media Policy and Children, Young People and Media Guidelines. The list below are the commitments within those policies and guidelines that are most relevant to sharing and managing data information in line with good safeguarding practice.

Protecting data and information

In the course of our work CAFOD commits to:

- Protect confidentiality by ensuring personal information is accessible only to authorised individuals.
- Obtain informed consent for interviews and before taking images (e.g., photographs and videos) of people in communities in line with requirements of Table 1 and respect their decision to say

no. Note that in some cases, country legislation may differ from CAFOD's minimum requirements, ensure to check with the relevant programme staff (e.g., the Safeguarding Focal Point).

- Ensure that all pictures of children and programme participants taken in relation to work with CAFOD are decent and respectful. Images of anyone that in any way has a negative impact on their dignity or privacy are not acceptable. Stories and images of children should be based on the child's best interest.
- Protect children's identity in any media involving under 18's. For example, by ensuring information, including combinations of information, which could be used to identify a child is not published in images and/or interviews.
- Apply a safeguarding lens to all promotional communications and fundraising activities and prioritise the protection of community members who share stories for communication or advocacy purposes.
- We work with partners to ensure systems are in place to safeguard personal information collected from communities.

Table 1: Consent required for images

Age	Consent from child required?	Consent from parent/guardian/carer required?
< 4	No	Yes
4-16	Yes. Seek informed consent as far as the child seems able to understand	Yes
17+	Yes	No, unless the image relates to a child or vulnerable adult who is developmentally delayed, which should be assessed on a case-by-case basis

Sharing data and information

In the course of our work CAFOD commits to ensure we:

- Share information with relevant stakeholders about what we aim to deliver and how we expect staff and representatives to behave, including commitments on protection from sexual exploitation and abuse.
- Share relevant information in languages, formats and media that are easily understood, respectful and culturally appropriate for diverse groups.
- Ensure stakeholders are aware how to feedback and/or raise a complaint with CAFOD and partners.

10. APPLYING CAFOD POLICY COMMITMENTS IN INTERNATIONAL PARTNERSHIPS

The majority of CAFOD's international work is delivered alongside and through local partner organisations. Therefore, good safeguarding practice requires that our partners also adopt safeguarding policies and take measures to prevent and respond to all types of abuse and exploitation.

At partner organisational level we undertake an initial assessment of partners through collaboratively completing a partner safeguarding profile, to ensure their safeguarding practices are appropriate and adequate in terms of their operational size and type of contact with people and communities. We work

with our partners to identify and agree appropriate and proportionate actions to address any significant gaps and to further strengthen good practice, providing support where appropriate and where resources allow.

At project level, we embed good safeguarding practice through systematic application of our Safe, Accessible, Dignified and Inclusive (SADI) framework. The framework ensures that programme participants are engaged in the design, implementation and monitoring of projects and programmes in order that safeguarding risks can be better identified and appropriately mitigated against.

Where gaps or weaknesses are judged to be significant, CAFOD may focus on capacity strengthening support before funding projects. These procedures and the guidance documents are outlined in CAFOD's Programme Management Manual.

Our **Project Funding Agreement** formalises the commitments in respect of both CAFOD and our partners. Partners must:

- Ensure a Code of Conduct, or other similar document, is in place that establishes, at minimum, the obligation of staff and volunteers not to exploit, abuse or otherwise discriminate against people and communities.
- If they have contact with children (anyone under 18 years old), or vulnerable adults, have a Safeguarding Policy in place.
- Manage any reported safeguarding concerns in a way that aligns with CAFOD's requirements and observes local legislation - seeking specialist support from CAFOD if needed.
- Advise CAFOD of all safeguarding concerns or complaints related to CAFOD-funded projects or programmes, or about our representatives, within 7 days (this includes sexual exploitation and abuse of children or adults, and other abuses of power).
- Accept CAFOD may need to follow-up on specific safeguarding concerns or complaints and provide support and that where CAFOD has reason to believe a concerns or complaint has not been dealt by the partner in a safe and appropriate way CAFOD can consider withdrawing funding or ending the relationship.

In addition to the above:

- CAFOD will not fund long-term institutional care of separated children (i.e., orphanage care) but will continue to encourage and support rehabilitation and reunification projects wherever possible.
- Similarly, CAFOD will not use child sponsorship as a way to raise funds, due to the large-scale child protection implications of this.

11. REPORTING & MANAGING SAFEGUARDING CONCERNS OR ALLEGATIONS

11.1 How to report

Concerns and allegations can be reported in the following ways:

- Directly to a member of the CAFOD Safeguarding Team or CAFOD Safeguarding Focal Point.
- Directly to a senior CAFOD manager.
- Through our confidential and secure CAFOD EthicsPoint web platform. EthicsPoint is an independent hotline and confidential case management system run by NAVEX Global, a third-party company. All Safeguarding reports submitted via the webform will automatically be directed to our specialist safeguarding staff.

Staff who raise a concern or allegation about potential or actual wrongdoing or serious malpractice carried out by CAFOD or our representatives (which includes safeguarding concerns) will be protected from detrimental treatment in accordance with CAFOD's whistle-blowing policy, provided concerns and allegations are raised in good faith. Although legal protection for whistle-blowers cannot apply in all locations, CAFOD will make every effort to ensure partner staff who raise concerns or allegations about CAFOD (or a partner organisation) are protected from any negative treatment that might arise from a report.

There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations to how a historical concern can be addressed but CAFOD will take every reasonable measure to address the concern, for example, by gathering any available evidence and contacting witnesses, where a risk assessment shows it is safe to do so.

11.2 CAFOD procedure: how issues are handled – See Annex 2

CAFOD manages safeguarding concerns and allegations in accordance with this policy and CAFOD's investigations guidelines, prioritising the safety of the person raising the concern/allegation and those affected at all stages. Upon receipt of a safeguarding concern or allegation, CAFOD will:

- Act, avoiding unnecessary delays and prioritising the safety of the survivor.
- Hold a Safeguarding Committee meeting within 24 hours to:
 - assess the concern and consider if further investigation is required (based on an indication that there may have been a breach of our Code of Conduct)
 - in the event of an investigation, decide whether the investigating officer/team is internal or external
 - decide next steps, including if anyone else needs to be informed (on a "need to know" basis).
- Where a CAFOD representative is the subject of an allegation, liaise with HR to discuss whether suspension is required until an investigation is completed. Suspension does not imply guilt but protects all parties.
- Investigate the allegation in a manner appropriate to the content of the report (see CAFOD's Investigation Guidelines).
- When appropriate, keep the person raising the concern/allegation updated of progress and resolution, unless:
 - the situation means we must respect the privacy of individuals who may be affected
 - the survivor has expressly indicated a preference not to receive contact
 - the report has been made anonymously and this is not possible.
- Observe our policy commitments on confidentiality.
- Staff must comply with safeguarding related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation.

11.3 Notifying authorities or other organisations

- Referral to authorities We will refer any reports involving criminal activity to the relevant authorities responsible for investigation, when safe to do so. As a rule, internal investigations should happen only when criminal investigations have been concluded. Any representatives who believe a child or adult in the UK is at imminent risk of significant harm should contact the police by phoning 999.
- Notifying within the Church: if the concern relates to an individual within a UK parish, the representative should contact the relevant Diocesan Safeguarding Coordinator. Concerns involving

members of the Clergy are forwarded to the Bishop for follow-up in accordance with Canon Law. Concerns involving people in religious life are referred to the relevant congregation leader. CAFOD should liaise with the Bishop in relation to cases that meet the threshold for reporting to the authorities (e.g. child protection legislation). CAFOD will ensure relevant measures are in place to protect others from potential harm (e.g. the person involved will be removed from duties involving children or vulnerable adults) pending outcome of investigation.

- Notifying other international development agencies: if the concern relates to other agencies, it will be directed through their own complaint mechanism or to the agency's most appropriate manager
- Onward Reporting: We report statistics and anonymised individual serious reports to the relevant regulatory bodies and donors, such as the Charity Commission, as required. The identity of the persons who raise concerns will be kept confidential as far as possible. If the person concerned has a personal interest in the matter, they must disclose this at the outset. However, due to the nature of some investigation processes it may not be possible to retain complete confidentiality. This includes situations where the police are involved, where statutory child protection procedures need to be adhered to, or when disciplinary investigations are held and individuals need to make a statement, which may be seen by third parties. In relation to safeguarding issues, CAFOD adopts a survivor centred approach which will guide the process for dealing with the disclosures made.

11.4 Support to survivors of sexual exploitation and abuse

CAFOD commits to supporting survivors of sexual exploitation and abuse perpetrated by a CAFOD representative, regardless of whether a formal internal process is carried out. The needs, well-being, and safety of the survivor are paramount, and therefore, as they are best placed to understand their own safety and well-being needs, should be led by the wishes of the survivor as far as possible and as appropriate. However, there may be occasions where CAFOD has a duty of care to respond even if the survivor/complainant does not want to take forward action. This will be managed on a case-by-case basis and the decision will be made by the Safeguarding Case Management Committee in conjunction with the Safeguarding Team. This will only be done following clear risk assessments, analysis of the age and agency of the survivor (as decisions may need to be taken on behalf of children, working with their care givers) and will always ensure that the safety and wellbeing of the survivor/complainant is paramount.

CAFOD commits to supporting survivors by ensuring any process is non-directive, and non-judgmental. In addition:

For community members, partner staff and other representatives, CAFOD can:

- Facilitate access to locally existing medical and psychosocial services according to guidance provided by the relevant CAFOD Safeguarding Focal Point, (see Safeguarding Context Mapping document for relevant country)
- Seek to provide immediate material care as needed
- Work to provide protection if the security of the individual is at risk
- Facilitate access to assistance to understand how to pursue claims, both administrative and legal, against the alleged perpetrator.

Once a person's claim has been substantiated, they can receive not only the basic assistance described above, but also additional help to address the broad range of consequences of sexual exploitation or abuse.

12. POLICY DISSEMINATION AND TRAINING

In order that CAFOD can meet its safeguarding commitments, it is essential that everyone associated with the organisation is clear about these commitments, the expectations CAFOD has of them, and what this means in practice. The safeguarding policy and other necessary guidance documents are translated into local languages, illustrated in child-friendly and culturally sensitive formats. Appropriate language will be used so that young children and non-literate persons can easily understand. The policies will also be made available in accessible formats, such as shorter summary documents and clear print.

All **staff** must:

- Read and sign the Code of Conduct and Safeguarding Policy upon joining the organisation
- Undertake a mandatory induction on expected behaviours and the safeguarding policy
- Participate in refresher training

Volunteers must:

- Read and sign adherence to the Code of Conduct and Safeguarding Policy upon joining the organisation
- Attend Code of Conduct training as part of general induction
- Attend a safeguarding induction upon joining the organisation if in a relevant role (e.g., school volunteer, volunteer coordinators)
- Participate in refresher training at regular intervals

Staff **contracting other representatives and suppliers** must:

- Ensure they comply with anti-trafficking in persons requirements. All CAFOD representatives, suppliers, and service providers are also prohibited from employment practices related to trafficking as well as knowingly obtaining work-related goods or services that have been provided or produced by trafficked or forced labour.
- Ensure that when it is practicable to have bespoke contracts, these contracts state that they abide by CAFOD's Safeguarding Policy and Code of Conduct.
- Share a copy of both policies with the relevant individual(s)
- Provide an appropriate briefing on both policies before the contracted representative or supplier commences work (i.e., expectations on behaviour, relevant protocols and how to raise concerns)

Staff **managing/supervising vulnerable adult volunteers** must:

- As with all roles, ensure an appropriate induction takes place in which vulnerable adult volunteers are told who is responsible for their safety during their volunteering hours and how to raise concerns

Staff **arranging visits to UK and international programmes** must:

- Carry out relevant risk assessments
- Ensure the visitor completes a visitor safeguarding acknowledgement form
- Ensure that visitors (e.g., donors, trustees, supporters, journalists) receive an appropriate briefing before the visit commences (i.e., expectations on behaviour, relevant protocols and how to raise concerns)

CAFOD provides additional **specialised training for relevant roles** as required. For example:

- Complaint Handlers - senior managers and relevant advisors are required to attend training to ensure concerns and complaints are handled consistently and in accordance with CAFOD policy.

- Safeguarding Focal Points are trained to provide safeguarding support to colleagues
CAFOD **monitors completion of mandatory inductions and trainings.**

The **process for reporting safeguarding concerns** is publicised during induction sessions and in publicly displayed posters across all CAFOD offices.

13. COMPLIANCE WITH POLICY

- CAFOD's international programmes and England & Wales management groups are responsible for monitoring implementation of the policy and reviewing action plans; CAFOD's Corporate Safeguarding Officer is ultimately responsible for monitoring compliance. If a lack of compliance with this policy is identified by any individual, please report it immediately to a member of the Safeguarding Team.
- Corporate risk in relation to safeguarding is monitored within the corporate risk register.
- Complaints related to the conduct of CAFOD representatives (i.e., safeguarding, other conduct, grievances, etc) are monitored quarterly by CAFOD Executive Team and the Strategy and Performance Committee.
- Our practices are reviewed, adapted or revised in light of analysis of safeguarding reports (and other complaints) received and ongoing conversations with stakeholders.
- Safeguarding work throughout CAFOD is audited every 3 years either internally or externally, with the results presented to CAFOD's Executive Team and the Board of Trustees.

14. TRUSTEES RESPONSIBILITIES

Trustees are ultimately responsible for reviewing and approving this policy. They must ensure that CAFOD complies with best practice in safeguarding, in particular of children and vulnerable adults and take all reasonable steps to ensure that there is appropriate transparency and accountability. The Board appoints a designated Trustee for safeguarding and has agreed a working protocol and terms of reference for the role as well as having safeguarding as a standing item at all board meetings.

15. RELATED POLICIES, PROCEDURES, FORMS, GUIDELINES & OTHER RESOURCES

The following policies, procedures, forms, guidelines and other resources may support with the use and application of this policy:

- Policies: Code of Conduct, Complaints Policy, Whistleblowing Policy, Recruitment Policy, Volunteer Policy, Data Protection Policy, Social Media Policy, Caritas Internationalis Safeguarding Policy
- Procedures: Safe Recruitment Guidelines, Supply Chain Manual
- Forms/Templates: Safeguarding Reporting Form, Visitor Safeguarding Acknowledgement Form
- Other Resources: Investigation Guidelines; CAFOD's and Children, Young People and Media Guidelines; Caritas Internationalis Management Standards
- Safeguarding in digital communications (online activities guidance)
- Policies for resolving issues in the workplace: Grievance; Whistleblowing; Disciplinary; Dignity in the Workplace
- Terms of reference for the CAFOD Board of Trustees Safeguarding link

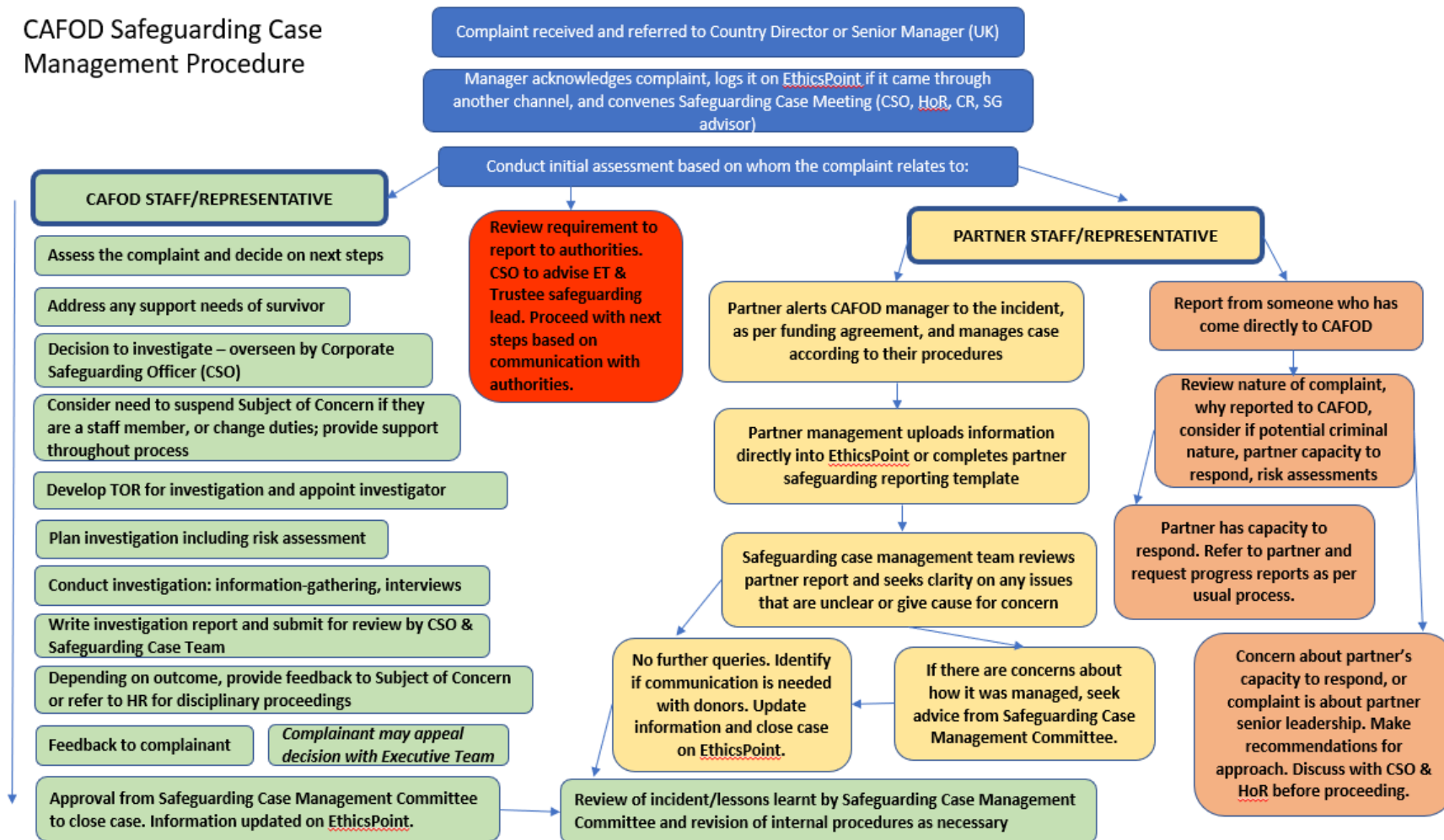
16. ANNEX 1: Guidance on responding to a direct disclosure

CAFOD's Safeguarding Team and safeguarding focal points can provide expertise and guidance in responding to concerns and allegations of abuse and exploitation, including investigations into sexual exploitation and abuse. If an individual discloses abuse or exploitation directly to you:

- The first priority is the immediate safety and welfare of the child or vulnerable adult. Contact your Safeguarding Focal Point if you require immediate guidance.
- Remain calm, listen and accept what is said and take it seriously. Reassure them they have done the right thing.
- Let them speak freely but do not press for information. If they report abuse directly to you, only ask questions to understand the complaint e.g., who, what where, when, not 'why' questions. Do not put words in their mouth.
- Do not inform, question or confront parents, teachers or carers, or other staff about your concerns.
- Do not promise confidentiality as you have a duty to report concerns about individuals at risk to CAFOD.
- Tell the individual what you are going to do next
- Write notes of what you have heard as soon as possible, using CAFOD's safeguarding incident report form (Annex 2) where possible.
- Report the allegation, in line with CAFOD's procedures, immediately.
- Remember that CAFOD representatives cannot guarantee confidentiality to a person disclosing concerns if the survivor/victim is a child or vulnerable adult. Any information offered in confidence to CAFOD representatives relating to risks or concerns about a child or vulnerable adult should be received on the basis that it will have to be shared with the relevant person/people in authority. In the first instance this will be a senior CAFOD manager and/or a member of CAFOD's Safeguarding Team.

17. ANNEX 2: CAFOD Safeguarding Case Management Procedure

CAFOD Safeguarding Case Management Procedure



18. ANNEX 3: Safeguarding Incident Report Form

This form can be used to guide your conversation/quickly capture information about any actual or suspected incidents of sexual exploitation, sexual abuse, or any form of child or vulnerable adult abuse. If you are unable to complete all the sections, fill in what you do know. If there is more than one survivor, please complete a separate report for each survivor. The reporter's identity will not be disclosed except on a "need-to-know" basis.

This information should then be transferred into CAFOD EthicsPoint or shared with your Safeguarding Focal Point.

For any support or advice in completing this form or loading a safeguarding report onto CAFOD EthicsPoint please feel free to contact Sonia Pritchard, Safeguarding Advisor – Global, spritchard@cafod.org.uk; 07786 584 032 or, if based in Africa: Caroline Nalyanya, Safeguarding Advisor – Africa, cnalyanya@cafod.org.uk

Details of Person Completing the form	
Name	
Job Title	
Relationship to CAFOD (e.g., employee, staff, volunteer, partner staff)	
Contact Details (e.g., telephone number and email)	

Locations & Dates	
Current location of the person making/who made the report to you	
Location alleged incident occurred (as much detail as possible e.g., Country, City/Town/ Village, Address(es))	
Today's date	
Date alleged incident was disclosed to you if different to today's date	

The survivor's details

Does the survivor reporting wish to remain anonymous? *If there are concerns about confidentiality please leave the name, job title and contact details blank and refer to this individual as AV – Alleged Victim). If not, please capture as much information as you can below.*

Name	
Sex	
Date of birth <i>(if unknown, please specify if you think/know the individual(s) are under the age of 18, including actual/approximate age and sex (if known).</i>	
Relationship of survivor to CAFOD <i>(e.g., employee, staff, partner staff, volunteer, programme participant)</i>	
Job Title <i>(if applicable)</i>	
Current Location	
Contact details	
If the survivor disclosed to you directly, how did you receive this information? <i>e.g., by telephone/email/letter/in person</i>	
Other relevant details about the alleged victim: <i>e.g., family circumstances, physical and mental health, any communication/language difficulties.</i>	

Details of the person who reported this matter you (if different to the alleged victim)

Does the person who made the report wish to remain anonymous? *If there are concerns about confidentiality please leave the name, job title and contact details blank and refer to this individual as PR – Person Reporting) If not, please capture as much information as you can below.*

Name	
Gender	

Date of birth <i>(if unknown, please specify if you think/know the individual(s) are under the age of 18, including actual/approximate age and sex (if known))</i>	
Relationship of person reporting to CAFOD <i>(e.g., employee, staff, partner staff, volunteer, programme participant)</i>	
Job Title (if applicable)	
Current Location	
Contact details	
If a disclosure was made to them, how did they receive this information? <i>e.g., by telephone/email/letter/in person</i>	
How was this information disclosed to the person reporting?	<input type="checkbox"/> A disclosure made directly to them by the victim/survivor? <input type="checkbox"/> A disclosure or suspicions passed on to them from a third party? <input type="checkbox"/> It is their own suspicions or concerns?

Details of the Implicated Person

(sometimes known as 'subject of concern' or 'alleged perpetrator')

If there are concerns about confidentiality please leave the name, job title and contact details blank and refer to this individual as IP – Implicated Person) If not, please capture as much information as you can below.

Name	Gender
Date of birth	
Position	
Other relevant details about the implicated person: <i>e.g., Do they line manage the alleged victim?</i>	

Further information

Details of the allegation/suspicion(s). *State exactly what you were told or observed. Include details of any witnesses to the incident and any other information that could be helpful in addressing this matter. Use the persons own words as much as possible. Please use as much space as necessary and attach any supporting evidence:*

Time and Date alleged incident (s) occurred *(as specific as possible):*

How long has the issue being going on? *(e.g., happened once, multiple occasions, months, years):*

Has this incident been reported to external authorities? *(e.g., police). If criminal activity is suspected, please seek expert advice and ensure that the decision to report includes a risk assessment of all potential protection risks to all concerned, including the survivor and the implicated person.*

Has any immediate action been taken to provide the alleged victim with support *(e.g., counselling, medical assistance)? If so, please describe.*

Has any immediate action been taken in respect of the implicated person? (e.g., suspension)? If so, please describe.

What would the survivor like to happen?