

Safeguarding

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Policy Owner:	Chief Executive

1 Policy Statement

Safeguarding involves protecting all INTRAC staff and those associated with INTRAC, particularly children and adults at risk, from any harm or abuse arising from: each other, themselves, our activities or organisational failings whilst in contact with INTRAC. Our safeguarding approach covers our policies, the way we work and our organisational culture. We want all of these to work together to prevent and respond to safeguarding issues effectively.

INTRAC believes that all children and adults, regardless of age, gender, disability, ethnic origin or economic status, have a right to be protected from all forms of harm, abuse, discrimination, neglect and exploitation.

In the process of their work, staff are rarely in contact with those groups classified as 'at risk' (children and adults who are vulnerable because of their specific context or identity markers). We therefore focus on safeguarding as an issue that is important to us because of our values, and as part of our role and contribution in the wider sector, noting also that we work with others who may have frequent contact with individuals at risk.

Safeguarding is everyone's responsibility, whatever their role in the organisation. INTRAC, its trustees and staff (including all full time and part time paid employees, and volunteers) have a collective and individual duty of care to promote health, safety and wellbeing, and to protect from harm, all those working with, or involved in any way with our activities. INTRAC also works with external (network) consultants. Network consultants are expected to undertake regular (annual) safeguarding training, commit to sector-wide standards on safeguarding, and agree to follow our practice on safeguarding as contained in this policy.

This policy makes clear our commitment to and positioning on safeguarding. It tells those working with INTRAC what their responsibilities are in relation to safeguarding, at work and when in contact with clients, partners and others involved in our work. It provides an overview of how safeguarding is integrated into different aspects of our work. It sets high standards, and we will continue to learn from emerging practice to ensure that everyone who comes into contact with INTRAC is kept safe from harm and is able to thrive.

2 Linked Policies

INTRAC's policies relating to protecting staff from harm are set out in [INTRAC's Code of Conduct](#), and Staff Handbook. Specific relevant policies are: equal opportunities, [anti-bullying and harassment procedures](#), [ethical conduct](#) and [whistleblowing principles](#), and our [travel safety and security policy](#).

3 INTRAC's safeguarding commitments

INTRAC's main contacts are adult professionals working in civil society organisations across the globe; and their funding partners – mainly INGOs and government donors, trusts and foundations. These relationships have different power dynamics but do not generally include children or adults at risk (defined as people over the age of 18 who at this moment in time have support needs and are unable to protect themselves against significant harm or serious exploitation). However, INTRAC is committed to safeguarding everyone who comes into contact with our organisation, and providing safe environments for all the work we do, whether online or face to face.

In **all** our relationships and in **all** our activities INTRAC is committed to ensuring that we live out our values, and that all those we work with, including children and at risk adults, are listened to, valued and respected, and provided with a safe environment with which they can choose to engage.

This includes acting to prevent harm and promote safety in our consultancy and training work, in how we approach research, learning and communications, and through our publications, website and social media channels.

We will consider issues of equity, diversity and inclusivity throughout our safeguarding work and the approach we take, ensuring that we create a positive self-guarding culture. We will not tolerate harm or abuse in any form by INTRAC staff, or those working with us. This means we focus on creating an environment where:

- Harm is prevented
- People who we work with feel supported to thrive, that their well-being is safeguarded, and that we build a culture of inclusivity, where diversity is celebrated, and equity is embedded
- Staff and all those in contact with the organisation feel safe to raise concerns and complaints without fear of repercussions
- Imbalances of power are well understood
- The safeguarding policy is understood and promoted within INTRAC and with all those that we work with
- Systems and support are in place to respond to any safeguarding concern or complaint.

In addition to specific contexts that individuals experience which heighten their vulnerability, we also recognise that safeguarding issues are often rooted in imbalances of power. Systemic injustice constantly and actively oppresses people depending on different and intersecting identity markers; and due to this some people are less able to protect their rights. By acknowledging intersectionality in our safeguarding work we can better understand people's varied experiences of harm, and how we can best empower people to protect their rights and ensure we do not discriminate in our work.

4 Roles and responsibilities

INTRAC trustees and staff are individually and collectively responsible for implementing this policy, promoting it as relevant in all aspects of their work, and holding themselves and others to the standards of behaviour expected in INTRAC's Code of Conduct.

The Board will assign a Trustee a "Risk Owner" responsible for maintaining oversight of governance risks associated with safeguarding, and able to receive complaints or concerns.

Trustees will provide oversight to ensure that:

- INTRAC meets statutory regulations and expectations, and that a positive safeguarding culture is championed throughout INTRAC

- reporting and response processes are in place and aligned with organisational ways of working and structures, and that safeguarding concerns and complaints are taken seriously and responded to proportionality and robustly
- INTRAC has a positive safeguarding culture and practice, meaning: that all staff and network members have access to and are familiar with the safeguarding policy, that staff receive training relevant to the level of risk in their role, and that everyone knows how to recognise, respond to, report and record a safeguarding concern;
- INTRAC focuses on continual improvement in safeguarding: learning from our experience and the experiences of others,

Staff and network consultants

- Behave in line with INTRAC's values and adhere to INTRAC's code of conduct
- Report any disclosure, suspicion or risk of harm, or abuse immediately to the designated safeguarding officer (Director of Finance)
- Contribute to creating and maintaining a positive safeguarding culture that prevents harm, and supports all those who work with us to thrive, feel safe and raise any concerns
- Create safe spaces for open conversations about equity, diversity and inclusivity; recognise the importance of a diverse workforce
- Uphold and promote the safety and wellbeing of staff, partners and clients and people who participate in any programme we directly engage with
- Take responsibility and be accountable for understanding, promoting and implementing the policy
- Disclose to the designated safeguarding officer any sexual relationship they have with other INTRAC staff or consultants as this may lead to a change in ways of working if there is deemed to be a strong imbalance of power
- Ensure that when working with others (either in a client or partnership relationship) that the other organisation has a clear safeguarding policy and process

Staff and network consultants must not

- Act in ways that may be, or be perceived to be illegal, unsafe, harmful or abusive towards other INTRAC staff, or those that work with us
- Use any form of technology to harm or abuse others, this includes using INTRAC's equipment to access, view, create, download or distribute indecent images
- Investigate a concern or complaint unless specifically tasked by INTRAC to do this
- Abuse their position of power to withhold or give preferential treatment
- Use language towards others that is inappropriate, harassing or sexually provocative, or that is intended to shame, humiliate, manipulate or psychologically/emotionally abuse
- Disempower others or encourage them not to report concerns or complaints, or make their own decisions, or take action themselves
- Seek to make contact with or spend time with or exchange services, money or goods with those working with INTRAC, especially children or adults at risk, except as part of the designated activities set out in their role
- Engage in sexual relationships with any project participants, particularly children or adults at risk

INTRAC's Finance Director will be designated as "Safeguarding Officer" and will oversee the implementation of this policy, reporting periodically to the SMT and Board.

Senior leadership including designated Safeguarding Officer must:

- Be accountable for the overall implementation of INTRAC's safeguarding work, including communications with the board on safeguarding

- Embed a positive safeguarding culture, a sense of confidence in safeguarding and a safe environment
- Ensure all staff have access to and are familiar with the safeguarding policy, and know their responsibilities within it
- Develop and deliver a safeguarding plan, ensuring that policies, systems, referral mechanism and responsibilities are clear and embedded
- Ensure INTRAC is compliant with the charity commission's safeguarding guidelines and lead on case management for any safeguarding complains or concerns
- Ensure that recruitment policy and processes and other employment/appraisal processes are aligned with the values, commitments and procedures referred to in this policy (through safe recruitment processes, induction, training and line management support)
- Ensure that training is regularly evaluated to ensure that it is current and relevant
- Consider with the board which sector wide safeguarding related initiatives are most relevant for INTRAC and oversee implementation of any we have signed up to

INTRAC reserves the right to periodically review and amend this policy, and will advise new and existing staff of any changes.

5 Safeguarding Complaint or Concern Procedures

It is the responsibility of all who represent INTRAC, in whatever capacity, to raise a concern or make a complaint to INTRAC about something they have experienced or witnessed, or if something has been disclosed to them, or if they believe that there has been a safeguarding issue. This could be observed in person, or online. If the staff member believes that a crime has taken place they should also report this to the relevant authorities.

INTRAC is committed to responding to all complaints and concerns about abuse: investigating, recording and reporting these to the relevant authorities, in line with the INTRAC's Whistleblowing Policy, and the Complaint or Concern Procedures set out below.

INTRAC will ensure that safe, appropriate, accessible means of reporting safeguarding concerns and complaints are available to all staff, network consultants and those who work with INTRAC. And that a robust process is in place to guide response to any such complaints or concerns.

How to raise a complaint or concern

Staff and those associated with INTRAC can report a concern or complaint on their own behalf or on behalf of someone else, even if they have not been directly involved or affected. Any complaints or concerns should be referred to INTRAC's designated safeguarding officer (Finance Director) within 24 hours of receiving the complaint.

Reports can be done in two ways:

- verbally or in writing following INTRAC's whistleblowing procedures (i.e. send an email to 'whistleblowing@intrac.org'); raise a concern with their line manager/contact person at INTRAC;
- or through directly contacting the Finance Director as Safeguarding Officer.

If the complaint involves the Safeguarding Officer, the complaint should be made to the Chief Executive or Trustee designated as safeguarding "Risk Owner".

Complaints/concerns raised by or concerning INTRAC Employees

For INTRAC employees, our whistleblowing commitments govern the handling of concerns or complaints. These commitments are summarised as follows:

1. Personal Data protection in accordance with GDPR, 2018
2. Confidentiality, aside from those involved in the investigation
3. Implications of a criminal investigation - meaning that confidentiality might need to be breached

4. Protection for staff who raise a concern or report an incident, to ensure that they are not subjected to any detriment as a result.
5. Treatment of a deliberately false allegation as an act of gross misconduct.
6. Provision of opportunity to 'put your side of the story' if you are the subject of an allegation.

False or malicious complaints of harm and abuse are extremely rare. However, if INTRAC staff are found to have made a complaint they knew to be false they will be subject to disciplinary action. It is important to note that insufficient evidence being available to support a formal investigation of a complaint does not necessarily mean it was false or malicious.

If an allegation is made against an employee, then s/he/they must inform their manager immediately. The employee and manager should create a signed and dated record of the details and send a copy of this to the designated safeguarding lead (Finance Director).

Where crimes affect an individual's safety and welfare, INTRAC has a legal duty to respond to them as a safeguarding concern.

Responding to concerns and complaints

INTRAC is committed to responding to all safeguarding complaints and concerns. As designated safeguarding officer the response will be led by the Finance Director.

Step one: Where possible, if contact details have been provided, the complaint or concern will be acknowledged, using appropriate means of communication.

Step two: Within 72 hours of receiving a concern or complaint a case report will be opened. The concern or complaint will be triaged and an assessment made to understand what types of harm have been reported. Where possible the Designated Safeguarding Officer will talk to the person reporting the concern/complaint to better understand their views, wishes and feelings; and those of the affected individual.

Step three: The exact process followed will depend on who the complaint concerns. In whichever case it will be crucial that confidentiality is maintained (see below).

Complaints about INTRAC's staff

If the safeguarding complaint involves a staff member then INTRAC may need to conduct an internal investigation. Disciplinary procedures as set out in INTRAC's staff handbook will be followed.

INTRAC may suspend personnel who are the subject of concern while the investigation and any disciplinary procedures take place; and if there is evidence of a policy breach then action will be taken in line with INTRAC's processes. Investigations will take place by a staff member who has been fully trained. All investigations will take into account good practice set out by ACAS. The SMT and safeguarding officer will ensure that lessons are learnt in the most appropriate way and that these lessons inform future organisational practice.

The designated safeguarding lead must ascertain and comply with any legal, regulatory and contractual obligations to report suspected cases of abuse, including to the police or other statutory authorities for criminal investigation.

Complaints about INTRAC's partners including: clients, consortia, network consultants, and organisations we are working with

If INTRAC receives a complaint about an organisation, or individual we are working with (either a partner or a client, or network consultant) INTRAC's Designated Safeguarding Lead will advise them of the complaint and require them to respond quickly and appropriately.

If the outcome of the partner's/client investigations is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned.

If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner then INTRAC will consider terminating the relationship.

If the complaint concerns a network consultant, then INTRAC will follow our own internal investigation procedure to review the complaint. If it is decided that a safeguarding breach has occurred INTRAC will terminate the relationship with the consultant, and consider whether further action is appropriate.

Complaints where INTRAC staff, clients or partners are not involved

Where the complaint or concern does not involve INTRAC staff or partner staff, the Safeguarding Lead will take reasonable steps to ascertain who should be advised of the allegation and pass the information on to them. Where appropriate the Safeguarding Lead will also inform legal and regulatory authorities in accordance with whistle-blowing policies.

Confidentiality

Confidentiality is about privacy and respect for a person's wishes. It is essential that confidentiality is maintained at all stages of the process when responding to safeguarding concerns and complaints.

Information related to concerns and complaints will be shared on a 'need to know' basis only.

Confidentiality will only be breached where we have a duty of care – if we become aware of the occurrence of a risk, or harm and we believe someone is incapable of taking action themselves regarding their own or someone else's safety.

Confidentiality must be maintained throughout the complaints process by all staff and witnesses. Breaches of confidentiality will be treated as gross misconduct and subject to disciplinary action up to and including termination of employment.

6 Safe Recruitment

INTRAC is committed to preventing perpetrators of any safeguarding abuse from being hired, (re)hired or (re)deployed. Managers will ensure robust recruitment screening processes for all personnel, including employees, volunteers, consultants and other representatives.

INTRAC's commitments through the recruitment process include:

- Ensure all job adverts emphasise INTRAC's commitment to the prevention of sexual exploitation and abuse; and to actively encourage equity, diversity and inclusivity in the organisation
- use application forms
- ensuring that interviews explicitly explore attitudes and understanding of safeguarding and equality
- using references to ensure thorough checks on attitudes and any concerns on safeguarding and equality
- Joining the Inter-Agency Scheme For the Disclosure of Safeguarding-Related Misconduct in Recruitment Processes within the humanitarian and development sector (<https://www.schr.info/the-misconduct-disclosure-scheme>) (we joined in October 2022, and we will review whether and how this works in relation to recruitment).
- Ensuring that all those responsible for recruitment have undergone safer recruitment training, such as: <https://alison.com/course/safer-recruitment>

INTRAC is also committed to equity, diversity and inclusivity of staff and in its culture and practice across the organization. We believe that an EDI approach underpins a positive safeguarding culture. For this to take place we are continually strengthening our recruitment practices with the intention of enhancing the diversity of our staff; paying attention to the underlying culture at INTRAC to ensure that it is safe, equitable and inclusive for all.

Recruiting managers will share the safeguarding policy and code of conduct as part of contract negotiations with potential staff and consultants; ensuring that there is time for proper discussion on the policies, and the individuals have understood their contents. Staff and consultants will be required to sign up to both policies as a condition of joining INTRAC/being part of INTRAC's network.

7 Use of Personal Data about Children and Adults at Risk

INTRAC has a responsible research /research ethics policy, which guides how data is collected, managed, analysed and stored, and ensures that INTRAC uses its values in how it designs and delivers research – putting people at the centre, ensuring integrity, openness and the right to be safe; and that we are professional in our approach – taking care, keeping confidentiality, behaving professionally and protecting the environment. This includes being clear that:

- All personal information stored by INTRAC about programme participants is processed in accordance with INTRAC's Data Protection Policies which are based on the General Data Protection Regulation of the European Union (2018).
- In all research with people the respondent's identity is protected; and we ensure they have "informed consent" including in relation to the use of their image (if we are working with at risk people including children and vulnerable adults, who are unable to give consent then we ensure that we have developed an appropriate ethics procedure which includes clarifying who can give consent on their behalf).

8 Training and induction

INTRAC staff and trustees receive copies of the Safeguarding policy when they join INTRAC as part of their induction. Induction processes include a briefing on INTRAC's policies and values, the Code of Conduct, information about how to report concerns and complaints, and advice about where to seek further information about safeguarding and safer practices across the organisation.

Anyone working directly with community members on behalf of INTRAC must receive additional guidance on how to receive complaints and handle them in a safe and confidential manner, it will be the responsibility of the job manager or the Director of Consultancies, Impact and Influence to ensure that this additional guidance is provided. If an INTRAC staff member is travelling, the travel risk assessment will also include ensuring that the individual concerns knows where and how to report a safeguarding concern/complaint, and whether and how to include this in an incident management process/log.

INTRAC staff participate in an annual training /refresher on safeguarding; to ensure that there is good understanding of INTRAC policies and practice, and that we are continually taking action to strengthen INTRAC's positive safeguarding culture. Overall responsibility for this lies with the Chief Executive.

Network consultants and partner consultancies/organisations will be required to confirm to INTRAC that they have received appropriate training on safeguarding and that they are familiar with INTRAC's policy, organisational values and approach to safeguarding and reporting procedures.

9 Accountability

The trustees have the responsibility to champion a positive safeguarding culture in INTRAC and as part of this the SMT/ designated safeguarding lead will report annually to the board on key aspects of safeguarding. This includes, but is not limited to:

- Any safeguarding complaints or concerns that have been reported, and response to these
- Status of staff, network consultants, trustees and volunteer training completion, and signing of the relevant policies/code of conduct

- Status of any commitments made under the safeguarding policy
 - Reflection and learning on safeguarding in INTRAC
 - Future plans to strengthen safeguarding culture and practice
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Definitions of Terms Used in the Safeguarding Policy

Proposal to include key elements of safeguarding

Sexual Harassment: Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Such conduct will also be considered sexual harassment when it interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

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. INTRAC recognises that the terms sexual abuse and exploitation represent a wide spectrum of behaviours and is not limited to the act of sexual intercourse.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This would include forced marriage and sexual slavery and also includes sexual activity with a child (any person under the age of 18),

Sexual Relationship: Includes but is not limited to staff members or related personnel having a physically intimate relationship, or an online sexually related relationship via social media, text or telephone.

“Staff” is used throughout the safeguarding policy as a collective term referring to paid employees, working on either full time or part time basis.

Consultants is used to refer to independent contractors who deliver work on a contractual basis to INTRAC or our clients

Safeguarding Children: Safeguarding is the process of protecting children from abuse or neglect, preventing impairment of their health and development, ensuring they are living in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

A **Child** is defined as anyone under 18 years old. The definition of a child for the purposes of safeguarding should not be confused with the legal definition of a child or age limits set out in other relevant laws. The fact that a person under the age of 18 may have reached the age of majority, age of sexual consent, voting age or such like does not alter their inherent vulnerability as a child.

Child Abuse : Different forms of harm or mistreatment of children are categorised under the broader term “child abuse”. Abuse can happen anywhere and at any time, but research shows that the perpetrators of abuse are likely to be known and trusted by the child. The most commonly defined types are:

Physical - violence towards or deliberate injury of a child;

Neglect- persistent failure to meet a child’s basic physical and psychological needs;

Sexual- using a child for sexual stimulation or gratification; and

Emotional- behaviour which attacks a child’s self-esteem.

Child Sexual Exploitation: Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Safeguarding Adults at Risk: The process of protecting adults from abuse or neglect, enabling adults to maintain control over their lives and make informed choices without coercion. It involves empowering adults at risk, consulting them before taking action unless someone lacks the capacity to make a decision, or their mental health poses a risk to their own or someone else's safety, in which case, always acting in his or her best interests.

An **Adult At Risk** is defined as:

*“any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, or unable to protect themselves due to age or illness and who may be unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation”.*¹

Since 2005, the range of adults considered to be at risk has been widened to include people encountering domestic abuse, substance misusers and asylum seekers.² An elderly person, while they may require extra support, does not necessarily meet the definition of adult at risk.

Vulnerable Adult Abuse³: Abuse can take many forms and the circumstances of the individual must always be considered. It may consist of a single act or repeated acts. The following is a list of examples of the different types of abuse which may affect an adult at risk:

- **Physical** – includes, but is not limited to, hitting, slapping, pushing, kicking, misuse of medication, unlawful or inappropriate restraint and inappropriate physical sanctions;
- **Sexual** – is unwanted sexual activity or behaviour that happens without consent or understanding;
- **Psychological** – is emotional abuse which causes distress and can be verbal and non-verbal;
- **Financial and material** – includes theft, fraud, exploitation and pressure in connection to wills, property, inheritance and financial transactions, or inciting an adult at risk to do any of these things on another individual's behalf; it may also involve the misuse or misappropriation of property, possessions and benefits of an adult at risk;
- **Discriminatory** – 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;
- **Self-neglect** – includes a wide range of behaviours such as neglecting to care for one's own personal hygiene or health; and
- **Domestic Abuse** – is “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”⁴.

Mental Capacity: For the purposes of Safeguarding Adults, mental capacity is an individual's ability to:

- understand the implications of their situation and risk to themselves;
- take action themselves to prevent abuse;

¹ Department of Health and Social Care [No Secrets: Guidance on Protecting Vulnerable Adults in Care](#)

² Nottinghamshire District Councils and Borough [Definition of Child and Adult at Risk](#)

³ indirect Government Services [Recognising Adult Abuse, Exploitation and Neglect](#)

⁴ Home Office [Guidance: Domestic Violence and Abuse](#)

- participate to the fullest extent possible in decision making about interventions involving them, be they life changing events or everyday matters.