



SAFEGUARDING POLICY |

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1 Purpose of Document

In line with Integrity's values and ethics, the company takes comprehensive steps to safeguard our staff and those with whom we interact through our work. Our ethical approach means that we abide by the principle of "Do no harm" in our work and methods and have robust processes and procedures to ensure this. We work in environments where there are many particularly vulnerable groups and individuals. It is, therefore, appropriate to detail our specific approach to safeguarding so that our staff, consultants and partners have a clear understanding of the support we provide and what is expected of them.

This policy should be read in conjunction with individual engagement contracts and Integrity's Code of Conduct.

2 Applicability

This safeguarding policy applies to any interaction with children (under 18 years of age) or vulnerable adults (an individual over the age of 18 who for any reason is unable to take care of themselves, or unable to protect themselves against significant harm or exploitation).

All Integrity staff, consultants and partners are expected to understand and comply with this policy.

3 Principles

- Organisations have an additional duty of care to children or vulnerable adults with whom they work, are in contact with, or who are affected by their work and operations.
- If organisations work with partners, they have a responsibility to help partners meet the minimum safeguarding requirements.
- Any safeguarding actions should be in the best interests of the child or vulnerable person, which are always the paramount concern.

4 Approach

An individual can be vulnerable for many reasons, such as gender, age, economic status, disability or minority status. Many people become particularly vulnerable during and after conflict as family and community structures that protect them are eroded, and state institutions that might ordinarily provide support are missing or ineffective. We also recognise that our legitimate activities have the potential to create additional danger or harm for vulnerable individuals. As such, we have a duty to pay additional attention to considering vulnerable individuals in the planning and conduct of our activities.

Go beyond 'Do No Harm': All activities are designed and implemented with the aim of doing no harm and maintaining impartiality throughout the project lifecycle. However, a more nuanced approach is often required, especially when working in fragile and conflict-affected states (FCAS), to ensure existing risks to vulnerable people are understood and no additional risks are introduced.

Be conflict sensitive: Working with conflict-affected communities requires a thorough analysis of the drivers underpinning instability and violence. Integrity conducts a conflict analysis and listens to (a) stakeholders' perceptions of current conflict dynamics and (b) how they wish to

participate in research. This is key to mitigating risks stakeholders – particularly children and vulnerable individuals – may face if associated with Integrity activities.

Recognise other sources of risk: Integrity ensures that its teams and partners are aware that risks to respondents may arise from other actors and existing structural factors such as traditions and customs. Integrity considers carefully how its activities will be perceived and the potential consequences of those activities within each specific context.

5 Responsibilities

To support these principles, it is important to build a culture that prioritises safeguarding, so that it is safe for those affected to come forward, and to report incidents and concerns with the assurance that they will be handled sensitively and properly. To this end:

Integrity will:

- Ensure that staff, consultants, and the staff of our partners and suppliers are aware of and comply with this policy, the Whistleblowing Policy and, where appropriate, have their own organisational safeguarding and reporting procedures.
- Ensure safeguarding considerations are built into risk assessments and project planning from the outset and context appropriate procedures are developed for all projects and programmes.
- Respect the international and national laws and guidance regarding the protection of children and vulnerable adults including: The UK's Children Act (1989 and 2004), the US's Child Abuse Prevention and Treatment Act, the United Nations Convention on the Rights of the Child (1989), the UK's Equality Act (2010) and related guidance such as USAID Child Safeguarding standards, DFID's Safeguarding for external partners, Inter Agency Standing Committee principles regarding sexual exploitation, sexual harassment and abuse,
- Investigate and report on all allegations of sexual abuse and exploitation.

Staff and Consultants must:

- Be aware of and comply with this policy, the Whistleblowing policy and programme specific protocols pertinent to safeguarding.
- Understand and apply the principles laid out above and familiarise themselves with any specific donor criteria pertinent to their programme.
- Be accountable for all actions and not use unequal power relationships for personal gain.
- Be prepared to be trained to spot the signs of sexual misconduct, and not afraid to speak up about it if you are suspicious.
- Notify Integrity if found guilty of any criminal charges or allegations during employment or prior to employment.
- Immediately disclose to Integrity prior to contracting, or as soon as they occur therein, any criminal allegations, investigations, charges and/ or unspent convictions.
- Investigate and report on all allegations of sexual abuse and exploitation.

In order for Integrity staff and consultants to conduct their work they may need to be in close proximity to and work closely with children and vulnerable people. To ensure the safety of children and vulnerable people, to protect staff and consultants from potentially dangerous

accusations and to protect Integrity's reputation, staff and consultants must not hold unsupervised communication with a child or vulnerable adult in their professional capacity.¹

The following will not be tolerated and will result in disciplinary action. Any suspected or known incidents must be reported immediately to Integrity:

- Engaging in sexual relations with anyone under the age of 18 or vulnerable adults.
- Abuse or exploitation of a child in any way, regardless of local custom.
- Emotionally or physically harming a child or vulnerable adult.
- Exchanging money, employment, goods, services or preferential treatment for sexual favours.
- Behaving in a way that is, or appears to be, threatening to the security and safety of others.
- Concealing knowledge of behaviour or incidents, either one's own or others, when it is known or thought to be in breach of this policy, and that puts others in harm or danger.

6 Reporting

In addition to creating a culture in which safeguarding issues are understood, considered and accommodated within project and programme design and conduct, it is also vital that there are clear procedures for reporting incidents or concerns.

Any safeguarding incident or concern should be reported as soon as possible to an Integrity Safeguarding Officer.

For relevant projects, a local reporting chain will be established and individuals with appropriate languages identified to ensure partners and those we interact with are able to report issues effectively.

Integrity will sensitively investigate any report, putting the wellbeing of children and vulnerable adults first, in order to ascertain the veracity of the report, and take steps to mitigate harm or potential for harm.

Any report relating to immediate or imminent danger will, immediately be referred to trustworthy authorities² who may be able to assist. Integrity will report any other incident to the appropriate authorities and donors within 24 hours. The 24 hours will allow us sufficient time to make initial investigations, ascertain any veracity of the report and make a meaningful report to the client.

¹ It may be necessary to keep the content of conversations confidential, but meetings should be supervised to protect both parties from incident or false accusation.

² Noting that in some contexts where Integrity works reporting abuse to local or national authorities can itself be problematic, especially for minority groups.

References:

[International Child Safeguarding Standards](#)

[Convention on the Rights of the Child, 20 November 1989](#)

[UK Aid Direct - Safeguarding](#)

[U.S. child welfare](#)

interagencystandingcommittee.org



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