

IHP’s SAFEGUARDING POLICY

Table of Contents

1. Purpose and scope.....	2
2. Designated Safeguarding Lead	3
3. Definitions.....	4
4. Guiding Principles	4
5. Prevention.....	5
6. Reporting a concern.....	7
7. IHP Response to a concern.....	9
8. Confidentiality and Data Protection	10
9. Governance and Oversight.....	10
10. Monitoring and Review.....	11

1. Purpose and scope

IHP's Duty of Care Framework: IHP recognises a holistic duty of care to all people we encounter. To ensure clarity of oversight, this responsibility is managed through two frameworks:

- **External Safeguarding:** This policy (POL-022) focuses on protecting vulnerable individuals (children and adults at risk) from harm arising from contact with IHP's work. These issues are managed by the Designated Safeguarding Lead (DSL) and Board Safeguarding Lead (BSL): a.paterson@ihpuk.org and j.balaam@ihpuk.org
- **Internal Workplace Conduct:** Issues of staff-to-staff bullying or sexual harassment are handled by Human Resources under POL-039 (Sexual Harassment, Bullying and Victimisation Policy) and the Grievance Policy: hr@ihpuk.org

Safeguarding concerns involving vulnerable individuals: Safeguarding concerns that involve potential harm to children or adults at risk, including those arising from the conduct of IHP staff or representatives, must always be reported in accordance with this Safeguarding Policy, even if they occur in an internal context. For example, if a member of staff observes a colleague viewing indecent material involving minors, or receives an allegation of abuse connected to a child or adult at risk, this must be reported to the Designated Safeguarding Lead (see Section 6). This policy takes precedence over internal HR processes where the welfare of vulnerable individuals is at stake.

Policy Statement

As an international development organisation whose work is underpinned by both UK law and international obligations including the United Nations Convention on the Rights of the Child (UNCRC), IHP recognises a responsibility for ensuring the basic rights and dignity of those who encounter our work. IHP is committed to safeguarding the welfare of all staff and vulnerable individuals that we encounter in the course of our work, both in the UK and overseas. We recognise the rights and dignity of all individuals and will take all reasonable steps to prevent harm, abuse, neglect, or exploitation. Our organisation has a zero-tolerance approach to any form of harm and will always prioritise the safety and well-being of those we serve.

The purpose of this policy is to protect people, particularly children and adults at risk, from any harm that may be caused due to their encountering IHP. This includes harm arising from the conduct of IHP representatives (as defined in Section 3) or organisations who partner with IHP. This policy lays out the commitments made by IHP in relation to safeguarding and informs IHP representatives of their responsibilities in relation to safeguarding.

Scope

This policy applies to:

- **All representatives of IHP:** (as defined in Section 3 of this policy) in any context and regardless of geographical location. IHP representatives must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. Actions taken by IHP representatives outside of work for IHP that contradict the core principles of this policy, may also be considered a violation of the policy.

- **Organisations who partner with IHP:** who must take all reasonable steps to ensure the children and adults at risk who encounter IHP, and its programmes are safe and protected. IHP's partner organisations are expected to have a Safeguarding Policy or be working towards one; this is reviewed in the context of new partner applications and, with respect to existing partners, checked annually in our Annual Partner Update process.

Exclusions:

This policy does not cover:

- Bullying and harassment concerns in the IHP workplace: These concerns are handled by HR under IHP's Sexual Harassment, Bullying and Victimisation Policy (POL-039), and the Grievance Policy, found in the Employee Handbook.
- The handling of safeguarding complaints made to IHP's partner organisations: which should be undertaken in accordance with the relevant organisation's Safeguarding Policy.

Any breach of this policy will be treated as a disciplinary matter, potentially resulting in immediate termination of contract, voluntary involvement or representation. Additionally, it may involve reporting to the police and other relevant regulatory authorities in the UK and host nation.

2. Designated Safeguarding Lead

We have appointed a Designated Safeguarding Lead (DSL) who is responsible for overseeing the implementation of this safeguarding policy. The DSL will receive appropriate training to handle safeguarding concerns effectively and act as the main point of contact for safeguarding issues.

The DSL in IHP is our CEO, Adele Paterson. The Safeguarding Lead on behalf of the Board of Trustees (BSL) is Joanne Balaam.

Contact details

- DSL, Adele Paterson

email: a.paterson@ihpuk.org or mobile: +44 7833256949

- BSL, Joanne Balaam

email: j.balaam@ihpuk.org or mobile: + 44 7776 193788

The DSL is responsible for:

- Ensuring that the policy is implemented throughout IHP and all its representatives and that representatives undertake timely and appropriate training.
- Ensuring that this policy is reviewed at least every 12 months to ensure it represents best practice and is communicated to all IHP representatives. The DSL will also keep aware of any changes to the International Child Protection Policy and its developments in specific countries.
- Investigating, monitoring and recording reported safeguarding concerns promptly and rigorously.
- Ensuring the appropriate referrals (see Section 4.4.2), e.g., to law enforcement agencies, professional authorities or partner organisations, occur without delay. This

may include maintaining up-to-date knowledge of the methods for contacting Social Services, the Child Exploitation and Online Protection Command (CEOP).

- Appropriately delegating other designated safeguarding officers and duties.

3. Definitions

Safeguarding: Refers to the process of protecting and promoting the well-being of individuals, particularly children, young people, and adults at risk, from harm, abuse, neglect, or exploitation. It involves taking proactive measures to ensure that individuals are safe and protected in all aspects of their lives, including their physical, emotional, and mental well-being.

Duty of Care: Refers to the legal and moral obligation of IHP to take all reasonable steps to prevent harm, abuse, or exploitation of any person encountered through its work. In an international context, this includes a commitment to upholding the dignity and rights of individuals regardless of the operational model.

IHP Representative: This term is used in this document to refer to both IHP and IHP Inc. and their respective officers, directors, employees, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third-party representatives, regardless of where they are domiciled.

Vulnerable individuals: An umbrella term used in this policy to encompass both children and adults at risk. It refers to any person who, due to their age, disability, gender, context, or social standing, may be unable to protect themselves from abuse, harm, or exploitation.

Child: In line with the UNCRC and UK law, a child is defined as any person under the age of 18 years.

Adult at risk: An adult at risk is defined as any person of 18 years and above, who by reason of disability, age, gender, context, economic status, illness or social standing may be unable to personally protect themselves from abuse, harm or exploitation.

Abuse: In line with the definition of the World Health Organisation (WHO), IHP understand abuse to be all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child or adult at risk.

Protection from Sexual Exploitation, Abuse and Harassment (PSEAH): Refers to measures taken to protect beneficiaries from sexual exploitation and abuse by IHP representatives, and protection of all stakeholders from sexual harassment.

Digital Harm: Protection from the use of technology, social media, or electronic communication to bully, harass, or groom individuals, or to distribute abusive material.

4. Guiding Principles

IHP safeguarding is guided by the following principles.

- Everybody has an equal right to protection from harm, irrespective of gender, age, ethnicity, sexual orientation, marital status, disability, language, religion, political views, social origin or standing.
- IHP will take appropriate immediate action regarding its duty of care for children and adults at risk.
- IHP will ensure that all its representatives are inducted in safeguarding standards and procedures.
- IHP will ensure that its partners are willing to comply with safeguarding standards and procedures.
- IHP is fully committed to monitoring, updating and implementing this safeguarding policy. This policy will be reviewed every 12 months and earlier where necessary. IHP will ensure that this policy is updated to reflect any changes in UK law and/or international standards.
- IHP recognises its responsibility to maintain confidentiality and protect sensitive data. As such, information will only be shared if there is a legal basis and a legitimate reason for doing so.
- IHP recognises that there are cultural sensitivities in different contexts. IHP always seeks to operate in culturally sensitive ways which respect the diverse nature of the people with whom it works. IHP therefore recognises that there are different understandings of safeguarding and protection. IHP understands that safeguarding in such a context is, at times, a balancing act. However, in all situations, nations and contexts, IHP will follow the general principle that all children and adults at risk, without discrimination, have equal rights to protection from abuse and exploitation. IHP will not accept culture as an excuse for abuse.
- IHP commits to addressing safeguarding through its work, as well as through its procedures in relation to awareness, prevention, reporting and response outlined in this policy.

5. Prevention

All IHP employees are required to read and abide by this policy and the Safeguarding Code of Conduct. If an employee requires any additional support to understand or implement this policy, it shall be provided by the DSL, or an appropriate person authorised by them.

5.1 Training and Awareness

IHP ensures that all IHP representatives are made aware of the problems caused by abuse and the risk of harm to children and adults at risk and have understood IHP's Safeguarding Policy and Code of Conduct.

IHP ensures that all IHP representatives understand their role and responsibilities in regard to safeguarding children and adults at risk by ensuring all new employees and Trustees read this policy as part of their induction, and by ensuring all IHP employees and trustees attend safeguarding training at a level commensurate with the safeguarding responsibilities that are part of their role.

Safeguarding training and awareness will be provided to all new employees and Trustees at the earliest possible convenience. IHP representatives should attend compulsory safeguarding training at the start of employment and then every 2 years.

Safeguarding training will include how to respond to a disclosure, how to raise concerns about (potential) safeguarding breaches, and how to raise concerns about a colleague or partner. The training will also cover how to recognise the signs of abuse and where to obtain advice or support. Staff in roles that are likely to be in contact with adults at risk and children or, roles like safeguarding leads, will have enhanced safeguarding training.

IHP ensures that there are safeguarding leads appointed in the IHP staff team and Board to champion awareness of and compliance with this policy.

IHP will also provide training to our partners overseas, emphasizing the importance of safeguarding.

5.2 Safeguarding Code of Conduct

Our code of conduct outlines the expected behaviour and interactions of all IHP representatives working with children and adults at risk. This code will include guidelines on appropriate boundaries, respectful communication, and the prohibition of abusive or harmful behaviour. All IHP representatives must sign the IHP Safeguarding Code of Conduct.

5.3 Safe Recruitment and Selection Process

IHP implements stringent safeguarding procedures when recruiting, managing and deploying employees. Safe recruitment and vetting processes are followed for all employees. We will conduct thorough background checks and obtain references for all staff and volunteers involved in our projects, both in the UK and overseas. A basic DBS check is carried out on all new employees as well as Trustees. If an employee is expected to be regularly engaging with children and/or adults at risk, an enhanced DBS check will be undertaken as part of the recruitment process.

Our selection process will include specific safeguarding-related questions to ensure that only suitable individuals are appointed to work with adults at risk and children.

5.4 Logistics, Donation Deliveries and Engagement Design

IHP will design its logistics operations, donation deliveries, and partner engagements in a way that protects children and adults at risk. This includes the way in which information about individuals in our programmes is gathered and communicated, ensuring digital safety and privacy boundaries. Further details of how IHP works with programme partners is detailed in Section 5.6 of this policy.

IHP will conduct safeguarding risk assessments for all operations, activities and travel involving children and adults at risk. These assessments will identify potential risks and implement appropriate mitigation strategies to safeguard the well-being of all parties involved. Safeguarding risk is included as a standing entry in IHP's risk register, which is reviewed quarterly by the Governance and Risk Management Committee. IHP's governance and oversight of safeguarding issues is detailed in section 9 of this policy.

5.5 Overseas trips

All participants to visit IHP programmes will sign the Safeguarding Code of Conduct before travel. Informed consent will be sought for collection of stories and photos during the trip.

5.6 Our partners

Organisations who partner with IHP must take all reasonable steps to ensure that children and adults at risk who encounter IHP-supported activities are safe and protected. This includes an explicit commitment to Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) and the prevention of any form of harm, abuse, or exploitation.

As part of our due diligence in establishing a relationship with a prospective partner and our Annual Partner Updates for existing partners, we review the organisation's safeguarding policy to ensure alignment with international standards. We also annually request information about any safeguarding concerns that have been raised in relation to programmes receiving IHP product, including details of how these concerns were managed and how survivors were supported. This information is recorded as part of our due diligence processes, and further details sought, or actions followed up with the partner as necessary.

IHP will work collaboratively with our overseas partners to promote best safeguarding practices and provide capacity strengthening support and resources as needed. To ensure our approach is context-sensitive, we will seek to understand local risks through partner feedback loops, travel debriefs, and informal stakeholder engagement. We expect our partners to maintain accessible and safe reporting channels for the communities they serve, ensuring that any concerns involving IHP products or representatives are escalated to the IHP DSL immediately. Joint responsibility for prevention, reporting, and response is a core component of our partnership agreements and Memoranda of Understanding (MoUs).

5.7 Media, images and identification

IHP has guidance regarding the media and the use of actual names, images, including photographs and recordings, as part of its Informed Consent Policy (POL-038). This includes specific points regarding children and adults at risk and has been shared with all partners and others who are involved in collecting communications content for IHP. This guidance should be applied in all contexts and will be available from the Chief Executive Officer (CEO).

Representatives will be made aware of this guidance in relation to the safeguarding of individuals and the appropriate use of images and beneficiary stories. Specifically, all representatives must understand that they must not use this technology to access or distribute any information or images that may be harmful to children or adults at risk.

6. Reporting a concern

We have established clear and confidential procedures for reporting safeguarding concerns. Any staff member, volunteer, or partner who becomes aware of a safeguarding concern must report it to the DSL immediately. Reports will be taken seriously, and appropriate action will be taken promptly.

In the event of a safeguarding concern, we will follow our established procedures for investigating, documenting, and escalating issues as necessary. We will cooperate fully with local authorities and relevant agencies in both the UK and overseas to ensure the safety and well-being of those involved.

6.1 What to do if a child or adult at risk discloses something to you

- Listen to what the person has to say and let them speak freely.
- Do not try to confront the alleged perpetrator.
- Do not promise confidentiality. Instead, say that you will only speak to the necessary people.
- Inform the person of your next steps.
- Record immediately, or as soon after as possible, what the person has disclosed to you.
- If the matter is urgent – please go straight to the relevant authorities.
- Contact your line manager or the DSL.

6.2 How to report a safeguarding concern

IHP representatives must immediately report any allegations or concerns about abuse or harm to children or adults at risk. They should report these concerns to the DSL whose contact details are in Section 2 of this policy. IHP representatives should not determine if abuse occurred; that responsibility lies with the DSL.

Handling sensitive disclosures: Safeguarding concerns often involve deeply personal information that must be handled with care and strict confidentiality. When receiving or reporting a safeguarding concern, IHP representatives must:

- Never promise absolute confidentiality to the person making the disclosure, as information may need to be shared with the DSL or relevant authorities to ensure safety.
- Not attempt to investigate the concern themselves or question the individual beyond what is necessary to understand the immediate risk.
- Share information only on a strictly "need-to-know" basis with the Designated Safeguarding Lead.
- Never store safeguarding information in personal email accounts, personal devices, or unsecured files. All records must be securely stored in accordance with POL-033 (Data Protection Policy).

The DSL will initiate appropriate procedures when they receive a reported concern. If there are unresolved issues or delays in addressing the concern or if it involves the DSL or senior staff, the employee may directly contact the Safeguarding Lead on the Board of Trustees, whose contact details are in Section 2 of this policy.

Whistleblowing policy: We have a confidential policy in the Employee Handbook called the Public Interest Disclosure ('Whistleblowing') Policy, that allows anyone within the charity, as well as our partners, to report concerns about safeguarding practices without fear of retaliation.

IHP will also accept reports of concerns from external sources such as members of the public and official bodies. If the concerns do not relate to an IHP representative, the concerns may be referred outside IHP, where appropriate, e.g., to IHP's partners or law enforcement authorities (see Section 7.2 (Referrals) of this policy). The contact details for the DSL are in Section 2 of this policy.

If you are raising a concern, make contemporaneous notes with any case numbers to maintain a thorough reporting process. A written report should be produced and filed confidentially. The Reporting Safeguarding Incidents Form may be used for that purpose (Appendix 2).

Please note that some safeguarding concerns may constitute a 'serious incident' requiring mandatory reporting to the Charity Commission. The DSL and Board of Trustees are responsible for making this determination; further detail is set out in Section 7.1 of this policy.

If you wish to make a complaint about how a safeguarding concern has been dealt with, please refer to IHP's Complaint Policy (POL-021).

7. IHP Response to a concern

7.1 Investigation

IHP will investigate safeguarding concerns involving children and adults at risk in accordance with this policy and legal obligations. Investigations will be conducted using a survivor-centred approach, prioritising the safety, dignity, well-being, and consent of the individual at all stages.

Once a concern is reported, the DSL will define the scope, methodology and timescale for the investigation, or determine if the matter should be referred immediately to external authorities (see Section 7.2).

Independence and Oversight: The investigation officer must be a person with sufficient independence from any IHP representative who is the subject of, or implicated in, the concern. Where an IHP representative is the subject of an investigation, the DSL will lead the process, unless a conflict of interest exists, in which case an independent internal or external investigator will be appointed.

Evidence and Data Protection: IHP will collect any evidence in accordance with the law, which may include the review of digital communications and IT assets where relevant to the concern. All sensitive and personal data (including the identity of the person reporting the concern) will be shared on a strictly need-to-know basis and managed in alignment with POL-032 (IHP Privacy Policy) and POL-033 (Data Protection Policy).

Regulatory Reporting Charity Commission): The DSL will inform the Safeguarding Lead on the Board of Trustees of any reported concerns as soon as is practical. In accordance with Charity Commission guidance, the Board of Trustees holds the ultimate responsibility for identifying when a safeguarding concern constitutes a 'serious incident' that must be reported to the Commission and relevant donors without delay.

Personnel Management during Investigation: If the concern involves an IHP representative, IHP will conduct a risk assessment to determine the appropriateness of that individual continuing to work or represent IHP during the investigation. Where required, professional external advice will be sought to ensure the safety of all parties.

Disciplinary Action and Retaliation: IHP will apply appropriate disciplinary measures to any IHP representative found in breach of this policy or the Safeguarding Code of Conduct, up to and including termination of employment or representation.

In alignment with our commitment to prevent victimisation, IHP will take decisive action against anyone who seeks or carries out retaliatory action (including harassment or intimidation) against complainants, survivors, or witnesses. Any IHP representative found to have engaged in retaliation, or to have knowingly made a false allegation, will be subject to disciplinary action up to and including dismissal.

7.2 Referrals

The DSL will ensure that, where appropriate, referrals are made to the relevant law enforcement agencies, professional authorities, and/or partner organisations. Any case numbers should be recorded and kept with the report. The DSL will also report on IHP's handling of safeguarding concerns to the Charity Commission and relevant donors.

7.3 Support for individuals

IHP is committed to offering pastoral care and support to survivors of harm or abuse perpetrated by an IHP representative, regardless of whether a formal internal process is carried out. Decisions regarding support will be led by the survivor. IHP will be accountable to survivors about the outcome of any investigation or referral and will seek feedback from survivors.

Where appropriate, IHP will also signpost survivors to external specialist support services, which may include local social services, the Child Exploitation and Online Protection Command (CEOP), or other relevant support organisations depending on the nature of the harm and the context in which it occurred.

IHP will also offer supervision, support, and guidance to any IHP representative who has reported a concern.

8. Confidentiality and Data Protection

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

Regarding the UK General Data Protection Regulation and the UK Data Protection Act 2018, IHP recognises that protection is accorded to children. It is the responsibility of the Data Protection Lead to ensure that any personal information is kept confidential unless there is clear agreement of the individual and/or their parent/guardian, as per the IHP Data Protection Policy (POL-033). This can only be bypassed where dealing with a specialised welfare practitioner or law enforcement agency in relation to a specific safeguarding incident.

9. Governance and Oversight

The Designated Safeguarding Lead for IHP (the CEO) and for the Board of Trustees are both members of the Governance and Risk Management Committee (GRMC). The GRMC provides oversight of the Safeguarding Policy on behalf of the Board of Trustees. The DSL reports on safeguarding issues at each quarterly GRMC meeting (and more frequently if appropriate), including any safeguarding concerns, progress against the safeguarding

action plan, and safeguarding issues of strategic importance. The Safeguarding Action Plan is a standing operational document maintained by the DSL, reviewed at least annually, and available to the Board on request.

Safeguarding risks are continually monitored as a standing item on the IHP Risk Register; the register is also reviewed at least quarterly by the GRMC.

The Board of Trustees also plays an important role to help ensure that IHP complies with best practice in safeguarding and takes all reasonable steps to ensure there is appropriate transparency and accountability. The DSL provides updates on safeguarding within the CEO report for each quarterly meeting of the Board of Trustees. Additionally, as matters arise, the board of Trustees receives ad hoc confidential reports on incidents and approves separate reporting where applicable to relevant regulatory authorities.

10. Monitoring and Review

IHP will regularly review and update this safeguarding policy to reflect changes in legislation or best practices. We will continuously monitor the effectiveness of our safeguarding measures and make improvements as needed.

IHP is committed to implementing this safeguarding policy effectively to protect all staff and adults at risk we encounter. This policy will be reviewed annually and communicated to all relevant stakeholders.