CBM Ireland Children and Adults-at-Risk Safeguarding Policy

V: September 18th 2024

Introduction

The purpose of this safeguarding policy and its related procedures is to create an environment in which people, especially children, adults-at-risk and other programme participants are protected from any harm that may be caused because of their engagement with CBM Ireland's programmes, operations, and people.

This includes abuse or neglect arising from:

- The conduct of CBM Ireland Staff, Representatives (including consultants, contractors, board members, project visitors, interns, and volunteers), and Partners.
- Uncontrolled inherent risks in the design and implementation of CBM Ireland's programmes and activities.

This policy also ensures we consider the wellbeing of our staff and representatives and that they are protected while carrying out their responsibilities for and on behalf of CBM Ireland. It outlines the organisation's safeguarding commitments and informs staff and representatives on their safeguarding responsibilities.

All forms of abuse, including the threat of abuse, are covered under this policy except for sexual exploitation, abuse and harassment which are covered under the Protection from Sexual Exploitation, Abuse and Harassment policy (PSEAH).

Scope

This is a mandatory policy that applies to all CBM Ireland staff and representatives. It is also applicable to:

- Partner organisations. CBM Ireland expects partners to equally uphold high standards of safeguarding based on the UN Convention on the Rights of the Child and the UN Convention on the Rights of Persons with Disabilities. Partners are expected to have a robust policy in place that reflects good practice (at the minimum) on how they will prevent and respond to safeguarding complaints and concerns, and their duty of care toward programme participants, their staff, and volunteers (see Governance section for details).

Where partners do not have a policy in place, there is a contractual requirement for them to adopt this policy for all CBM Ireland projects they are involved in. Where possible, CBM Ireland will take steps to support partners in establishing the necessary policy and procedures.

This policy is developed in alignment with CBM Global Children and Adults-at-Risk Safeguarding Policy. Where suitable, the CBM Global Policy will be considered applicable such as when operations are being carried out under CBM Country Teams areas of responsibility. Where no CBM Global/Country Team presence exists, the CBM Ireland policy shall be applicable.

The policy applies both during and outside of contracted working hours, every day of the year. It will also apply under the following circumstances:

- Any safeguarding incident involving a CBM Ireland employee or representative.
- Any safeguarding incident in a project managed by a CBM entity (i.e., Country Team or directly by a Member or Technical team) where CBM Ireland funds or contractual obligations are being applied.
- Any safeguarding incident involving a Partner employee or representative in a CBM Ireland (funded) project.
- Any safeguarding incident in a project that is part or wholly funded by CBM Ireland;

The policy does not cover:

- Safeguarding concerns in the wider community not perpetrated by CBM staff, representatives, or partners.
- Sexual Exploitation, Abuse and Harassment. These are dealt with under the CBM Protection from Sexual Exploitation, Abuse and Harassment Policy.
- Safeguarding incidents involving a Partner in non-CBM Ireland (funded) projects. However, Partners should notify CBM Ireland of any safeguarding incident involving their staff or volunteers on such projects and their planned responses.

Definitions

Safeguarding is an organization's obligation to take all reasonable steps to prevent harm occurring; to protect people, especially children and adults-at-risk, from that harm; and to respond appropriately when harm does occur. Safeguarding includes CBM Ireland's duty of care to protect its staff and representatives from the risk of harm or abuse in the line of duty. Harm can occur through various forms of abuse, and includes all forms of physical and mental abuse, neglect, exploitation, or coercion.

Types of abuse

Abuse	Definitions	Examples
Sexual harassment	"A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating." United Nations	Telling sexually offensive jokes/emails/texts, unwanted sexual advances, requesting sexual favours, gesturing, or making sexual remarks about someone's body, clothing or appearance.
Sexual assault	A form of sexual abuse, it means any non-consensual sexual act that involves physical contact. This includes when the victim-survivor lacks the capacity to consent.	Groping, forced kissing, hugging.
Rape	This is a form of assault involving penetration of the vagina, anus or mouth. It is a form of sexual abuse.	
Sexual abuse	"Actual or threatened physical intrusion of a sexual nature, by force or under unequal or coercive conditions." United Nations	Sexual harassment, sexual assault, rape.
Sexual exploitation	"Actual or attempted abuse of a person's vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the exploitation." United Nations	Including child sexual exploitation, soliciting sex workers or exchange of money, employment, humanitarian relief items, goods or services for sex.
Exploitation (other forms)	Deliberate maltreatment, manipulation or abuse of power and control over another person. It is taking advantage of another person or a situation.	Human trafficking, radicalization, economic exploitation like child labour, forced labour, slavery.
Harmful traditional practices (HTP)	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. Though primarily committed against women	Female genital mutilation, child marriage, forced marriage, 'honour' based violence, scarification, female infanticide, dowry price.

	and girls, HTP occur across all sexes and genders, and are not unique to a particular culture or religion.	
Sexual relations with programme participants	Any form of sexual activity performed by a CBM staff, representative or partner with a programme participant will constitute sexual exploitation and abuse because of the power imbalance	CBM staff making sexual advances at a programme participant, CBM's partner staff dating a programme participant.
Physical abuse	Any intentional act causing injury or trauma to another person by way of bodily contact.	Slapping, smacking, hitting, punching, kicking, spitting at someone.
Psychological / emotional abuse	Harmful behaviour that can cause mental distress. It can involve both verbal and non-verbal abuse which can scare, humiliate, and isolate a person.	Yelling at a person, threatening a person's job security, intimidation.
Neglect	"The ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing." NSPCC	Malnutrition, Clothing is ill-fitting and dirty.
Financial abuse	Financial abuse is the theft or misuse of money, property or personal belongings of a vulnerable person, taken without consent or under pressure in connection with wills, property or inheritance.	Withholding a staff or volunteer's pay without any policy-backed formal documented justification.
Sexual activity with children (persons under age 18)	A form of sexual abuse that "involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening."	"The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)." NSPCC

Policy Statement

At CBM Ireland, we believe that every child and adult has the right to be protected from all forms of harm, abuse, neglect, and exploitation, regardless of age, gender, sexuality, sexual orientation, religion, ethnic origin or whether they have a disability. It is our responsibility at CBM Ireland to make sure that all children and adults who engage with our advocacy, advisory work, development, and humanitarian field programmes are safeguarded to the greatest extent possible.

CBM Ireland has a zero tolerance toward all forms of abuse and takes seriously any safeguarding concern or allegation involving CBM Ireland staff, representatives, and partners.

This means that we will:

- Take proactive steps to prevent abuse, including child abuse, financial abuse, emotional or psychological abuse, neglect, physical abuse, and verbal abuse. Sexual abuse is covered in the PSEAH policy.
- Respond to every reported concern and where there is indication of a possible violation of this policy, a thorough investigation will be initiated, and appropriate disciplinary action taken as required.
- Hold all CBM Ireland staff and representatives up to the same standards and procedures, regardless of their position within the organization.

In this context, it means CBM Ireland will put in place systems and procedures to ensure that our staff, representatives, programmes and operations do no harm to children, adults-at-risk and programme participants; that we do not expose them to the risk of harm, abuse, neglect or discrimination; and that all safeguarding concerns or allegations raised in relation to CBM Ireland are appropriately responded to in a timely manner and reported to the appropriate authorities.

Safeguarding in humanitarian action
We recognize that humanitarian situations pose some of the highest risk for abuse, neglect, and exploitation. These risks are higher for girls, boys and women with disabilities, the elderly and other marginalised groups. ***Article 11*** of the Convention on the Rights of Persons with Disabilities highlights the obligation to ensure the protection and safety of persons with disabilities in situations of risk, including armed conflict, humanitarian emergencies and natural disasters.

CBM Ireland will mainstream safeguarding in all stages of our humanitarian action – in the disaster preparedness phase, response, and early recovery, to fulfil our duty of care. This policy also includes the specific ways we will reduce safeguarding risks within our humanitarian work.

How to implement?
CBM Ireland commits to addressing safeguarding throughout its advocacy, advisory work, development, and humanitarian field programming activities using the three-pronged approach of prevention, reporting and response.

Prevention

- **Leadership**. Leadership is fundamental to prioritizing safeguarding and ensuring that it is sufficiently resourced and supported. CBM Ireland's leadership – the Board, CEO and Senior Management Team – will provide high-level oversight and accountability, as well as always promote and uphold the organisation's safeguarding principles and standards, serving as role models and advocates in their function.

- **Organisational culture**. CBM Ireland will create and sustain an organizational culture of openness and reporting. It will ensure a safe working environment that assures the respect and safety of everyone who works for and with CBM Ireland, including programme participants, partners as well as those in the communities where our programmes are delivered. CBM Ireland will establish trust in the communities where it works by robustly responding to safeguarding incidents, supporting victim-survivors, and holding those responsible for perpetuating acts of abuse accountable, thereby discouraging inappropriate behaviour and strengthening reporting.

- **Policies and systems**. CBM Ireland will develop, establish, and periodically review contextualized safeguarding policies, processes, and systems, to ensure safeguarding is well embedded across all levels within the organisation to sustain a safeguarding-conducive culture. The default approach will be to align, adopt and defer to, CBM Global policies and systems and only to rely on CBM Ireland processes where CBM Global is not present or applicable.

- **Safer recruitment**. CBM Ireland will have a rigorous recruitment and selection process in place to deter, identify and reject individuals who are deemed to be at risk of causing harm to children and vulnerable adults. This includes, but is not limited to, obtaining references, and conducting background/criminal record checks on potential new hires and including safeguarding responsibilities in job roles and job descriptions, especially those with direct or indirect contact with children and adults-at-risk. Where Garda Vetting is applicable for roles in Ireland, CBM Ireland will ensure that this is carried out.

CBM Ireland will support CBM Global to collaborate with wider interagency/sectorial initiatives, like the enhanced screening and information sharing mechanisms for new recruits - to the extent that it is relevant to its operations and legal boundaries - to improve its capacity to prevent, eliminate and respond to all types of abuse or threats of abuse in its work.

- **Safer programming**. CBM Ireland will adopt a risk-informed programming approach that ensures that our capacity to effectively prevent and respond to safeguarding incidents in a culturally sensitive manner is strengthened, and adequately resourced. Safeguarding risk assessments and planning will be carried out on all proposed project designs utilising CBM Global tools and systems, and proposals to proactively reduce inherent risks of harm or abuse posed to children, vulnerable adults, programme participants, staff, and representatives of CBM.

- **Partner assessment**. CBM Ireland will actively promote safeguarding to partners and require them to align with the safeguarding standards set out in this and CBM Global policies. Partnership safeguarding assessments are an integral part of CBM's due diligence process in partner selection. Initial assessments and reviews will be carried out in a collaborative and supportive manner with potential partners and existing ones respectively, to ensure their safeguarding practices are appropriate and adequate in terms of their operational size, required expertise and level of engagement on CBM projects.

- **Contracts**. CBM Ireland will ensure that all contractual agreements entered into with individuals and enterprises incorporate this global safeguarding policy where relevant; are clear about CBM Ireland's safeguarding obligations as a development and humanitarian agency, and its expectation that contracting parties will abide by and uphold CBM's safeguarding principles and standards; articulate that a breach of the policy - by failing to adequately prevent or respond to concerns of harm, including investigating reported incidents - will constitute grounds for the termination of their contracts with CBM Ireland. In consortium arrangements, CBM Ireland commits to work collaboratively with other consortium members to develop and implement a safeguarding framework in the best interest of the vulnerable groups, including children and adults-at-risk, within the target population.

- **Communication**. CBM Ireland will actively, on a regular basis, communicate its safeguarding policy and associated policies to all stakeholders, including the Board, staff, interns, volunteers, partners, programme participants, service providers and community members.

- **Research, Media, and social media**. CBM Ireland will follow ethical and protective principles to ensure that children and adults are represented in a dignified way, that their participation is not exploitative, and that people and organisations do not use photographs and related information beyond the agreed purposes and consent.

- **Training**. CBM Ireland will ensure that all members of the Board, staff and representatives regularly receive appropriate safeguarding briefing, training, and refresher courses relevant to their roles, responsibilities, the thematic programmes they are involved in and the nature of their engagement with children, adults-at-risk, and programme participants.

Reporting

CBM Ireland will ensure there are safe and appropriate multiple pathways in place to report safeguarding concerns for staff, programme participants, partners, and members of the public and will utilise CBM Global pathways where appropriate and as the default, rather than establishing additional approaches.

- CBM Ireland will work with partners to ensure they develop and establish community-based reporting mechanisms in consultation with project communities. This way, reporting barriers are identified and reporting systems designed to be accessible, confidential, safe and age- as well as culturally- appropriate.

- Information on safeguarding is made widely available in a variety of accessible formats at all CBM offices as per CBM Global policy. Likewise, partners will ensure their safeguarding policies and reporting systems are communicated and readily accessible in all communities where they work.

- CBM Ireland will ensure that people who report understand that whatever information they share will be treated confidentially and that every possible effort will be made to protect them from reprisals.

- In collaboration with CBM Global, safeguarding focal points and others who receive complaints will be trained and supported to carry out their duties in a professional, non-judgmental, and culturally sensitive manner, with due regard for confidentiality and data protection requirements.

- CBM Global **does not require** proof or evidence from persons raising safeguarding concerns or complaints. Any person can raise a concern or complaint they have heard about, witnessed, or experienced relating to a CBM staff, representative or partner without fear of reprisal.
- CBM Ireland staff and representatives **must not** conduct investigations on their own; their duty is to report to a safeguarding focal point or a senior team member.

CBM Ireland staff, representatives, programme participants, partners and community members can report, in writing or verbally, suspected or confirmed cases of safeguarding and abuse through any one of these established pathways:

Notify, in writing or verbally (face-to-face or by telephone) to:

- the CBM Ireland Safeguarding Focal Person: Caoimhehughes@cbm.ie
- CBM Ireland Board Safeguarding Focal Person Eoinmcmanus@cbm.ie
- or the nearest Safeguarding Focal Point, HR officer, Project officer or member of your CBM Office.

Alternatively, Safeguarding incidences may be reporting using CBM Global pathways.
1. Notify CBM Global's Global Safeguarding Manager at safeguarding@cbm-global.org
2. Report online using any of these links:
- cbm-global.ethicspoint.com
- From your mobile phone: cbm-globalmobile.ethicspoint.com
3. Use the anonymous whistle-blower email address: whistleblowing@cbm-global.org

CBM Ireland recognizes that sometimes, persons who wish to report a safeguarding concern may feel more comfortable doing so outside these identified pathways. For instance, a staff member may make a report to a trusted colleague and not a safeguarding focal point. The trusted colleague has an obligation to escalate the incident using any of the reporting pathways listed above. All reported cases, regardless of how they are reported, will be treated seriously.

Responding to safeguarding complaints

CBM Ireland considers victim-blaming unacceptable and will make sure all reported safeguarding concerns and complaints are taken seriously and addressed in a timely and professional manner, using the survivor-centred approach to ensure the safety and well-being of victim-survivors, and that their dignity and human rights are upheld throughout the process. A comprehensive and agile incident management system will be consistently maintained across the CBM federation, with consideration for local statutory and legal requirements.

- All reported incidents will be officially acknowledged within 48 hours of receiving the complaint and the Safeguarding Focal Point will request the CEO to initiate the SMT to assess the case to determine next steps and whether further investigation is required.

- CEO or Safeguarding Focal Person may elevate to the Board Safeguarding Focal Person if the level of seriousness warrants or if further advise is to be sought;
- The Safeguarding Focal Person may elevate to the Board Safeguarding Focal Person if the issue pertains to the CEO or if he/she feels that the CEO has a conflict of interest or has failed to give due attention to the issue'
- The Board and Committees are updated on all issues as a matter of course as part of the standing agenda items with respect to anonymity and confidentiality as required

- CBM Ireland will request the support of the CBM Global Safeguarding team in order to carry out any investigations that arise through CBM Ireland reporting mechanisms and where CBM Global policy does not apply. The CBM Ireland Safeguarding Focal Person will liaise with the CBM Global Safeguarding Manager to put procedures in place.

- CBM will prioritize victim-survivor support, ensuring that the support provided is timely, appropriate with consideration for culture, gender, and religion, and delivered by qualified professionals. We will put survivors at the centre of our decision-making process by keeping them informed and consulted on matters that affect them. Appropriate support and care will also be provided to the Subject of Complaint and witnesses to ensure the wellbeing of everyone involved.

- All investigations will be risk assessed with consideration for the safety of all individuals involved and delivered in a timely and professional manner by qualified investigators guided by a case-specific Terms of Reference.

- The outcome of investigations and disciplinary hearings will be shared on a need-to-know basis with relevant parties. Donors and regulatory agencies where necessary will also be notified.

- CBM Ireland will provide information as required to enable CBM Global to maintain a versatile case management database that is secure and confidential, to ensure quality assurance, accountability, and data protection compliance.

- CBM Ireland will maintain a learning posture by putting in place systems to review the management of safeguarding incidents. Learnings will be used to revise and improve existing processes and policies.

Governance and Accountability

Policy review
This policy will be reviewed every three years to ensure it is up to date and reflective of any changes that may have occurred with regards to CBM's activities or legal, regulatory and/or sectorial safeguarding standards.

Policy Adaptation
While this is a CBM Ireland policy, where necessary, the policy will be subordinate to the equivalent CBM Global policy where CBM Global presence and policy oversight is assured. Any areas of divergence will be addressed in consultation with the CBM Global Safeguarding Manager.

Policy implementation reporting

The CBM Ireland Safeguarding Focal Person will submit an annual report to the SMT and Board, on implementation progress across the organisation, safeguarding concerns and developments within the year and related incidents across CBM Global.

Roles and Responsibilities
At CBM Ireland, we believe safeguarding is everyone's responsibility. A breach of this policy or any of its associated policies may constitute gross misconduct resulting in disciplinary actions against individuals, and for organisations, termination of contracts and/or funding.

Board of Directors
The Board is ultimately accountable for the Safeguarding Policy. Key responsibilities for board members include:
- Review and approve safeguarding policy.
- Support the Board Safeguarding Lead role.
- Hold the Senior Management team to account to implement the safeguarding policy with diligence.
- Receive and review safeguarding reports on a regular basis.

Board Safeguarding Lead (Chair)
- Champion safeguarding throughout CBM Ireland.
- Support the Board to develop their individual and collective understanding of safeguarding.
- Ensure the regular review of safeguarding policies and procedures, and that these are presented to the Board.
- Work with the CEO and Safeguarding Focal Person to review CBM Ireland's safeguarding practices, to ensure they are creating a safer culture and work environment that keep people safe.
- Work with the CEO, Safeguarding Focal Person to manage all serious safeguarding incidents.

CBM Ireland Safeguarding Focal Person. (Programmes Manager)
- Act as a conduit for updating management on evolving good practice and advise on policy development;
- Provide support to CEO and Board to prevent and respond to safeguarding incidents and concerns.

- Escalate incident reports appropriately and seek additional support as needed when managing incidents.
- Raise awareness and promote best practices in safeguarding through trainings, briefings and regular communication;
- Liaise with CBM Global Safeguarding Manager act as conduit for information sharing, updates and incident management as required.

Senior Management Team
The CEO and all other members of the Senior Management Team are accountable to the Board for the implementation of the Safeguarding Policy across the organisation. They will:
- Stay informed and knowledgeable about the organisation's progress on safeguarding against sectorial standards and legal obligations.
- Check that CBM Ireland's safeguarding policy and procedures are fit for purpose and up to date.
- Ensure all CBM staff and representatives are aware of their safeguarding responsibilities and know how to report and respond to concerns.
- Ensure partners and others funded by CBM Ireland have adequate safeguarding policies and procedures in place.
- Ensure reported incidents are taken seriously and managed effectively with openness and transparency, and records stored securely.
- Ensure the safeguarding agenda and action plans are adequately resourced and budgeted for.
- Report serious safeguarding incidents to Regulatory bodies.

All CBM Ireland Staff and representatives
- have a responsibility to uphold CBM Ireland's Safeguarding Policy. They must read and sign a copy of this policy on taking up their work assignment at CBM Ireland.
- have a mandatory obligation to prevent, report and respond to all forms of abuse, including child abuse.
- must know and consider the power they (CBM Ireland staff) hold because of their position at CBM Ireland and take care not to abuse it by treating everyone with respect.
- Must actively seek the support and guidance of a senior colleague when i) unsure of what to do after witnessing an incident or behaviour that does not seem right, or ii) uncertain about whether what they witnessed is a safeguarding issue.
- Must not seek to retaliate against complainants, victim-survivors and witnesses involved in a safeguarding incident.

Country Safeguarding Focal Points are designated under the CBM Global Policy and do not fall directly under the CBM Ireland policy, however they play an important role in the Safeguarding ecosystem.
- Provide support to Country programmes to prevent and respond to safeguarding incidents and concerns.
- Escalate incident reports appropriately and seek additional support as needed when managing incidents.
- Raise awareness and promote best practices in safeguarding through trainings, briefings and regular communication with in-country teams and stakeholders.

Country Directors are designated under the CBM Global Policy and do not fall directly under the CBM Ireland policy, however they play an important role in the Safeguarding ecosystem.

- Be accountable for safeguarding and the implementation of a contextualised safeguarding policy in-country.
- Ensure all safeguarding risk assessments for projects and partners are completed on time and appropriate budget allocations made to carry out mitigation action plans.
- Support safeguarding focal points and committees to effectively carry out their roles.
- Ensure appropriate and competent survivor support services are researched and made available in-country.
- Ensure that complaints handling, and investigation procedures are established, along with appropriate disciplinary procedures where required.
- Ensure timely submission of all country safeguarding data and reports.