



# SAFEGUARDING VULNERABLE PEOPLE POLICY

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# SAFEGUARDING VULNERABLE PEOPLE POLICY

This policy sets out the general rules and principles to which DMI adheres. All DMI staff, directors and volunteers are required to read and understand all aspects of this policy and abide by it. All staff will need to sign a statement (or equivalent) that they have read and understood the policy when joining the organisation and then on an annual basis.

## 2 Introduction

It is DMI's policy to safeguard vulnerable people from physical, sexual and emotional harm while in contact with the activities of DMI and DMI staff, directors or volunteers. Vulnerable people include children and vulnerable adults.

Safeguarding is a term which is broader than 'protection' and relates to the action taken to promote the welfare of vulnerable people and protect them from harm. Safeguarding is everyone's responsibility. In the UK it is a legal requirement to take the necessary steps to safeguard vulnerable people, wherever those people are in the world. Safeguards are internal procedures and policies, for example:

- Making staff, directors and volunteers (and consultants or subcontractors) aware of what abuse is and how to spot it
- Having a clear system of reporting concerns as soon as abuse is identified or suspected
- Responding to abuse rapidly and carrying out investigations confidentially
- Preventing harm and abuse with a rigorous recruitment and interview process

DMI takes all reasonable steps to ensure that these safeguards are in place and that relevant staff receive regular training about DMI's policy and procedures with respect to safeguarding vulnerable people.

Any new project will be assessed for vulnerable people risks and this policy will be implemented if risks are identified. Implementation will be focused on *relevant* staff, directors or volunteers i.e. those who may come into contact with vulnerable people and those who manage staff, directors or volunteers who may come into contact with vulnerable people.

### 2.1 Responsibilities

The CEO is responsible for implementing this policy and also fulfils the role of Child and Vulnerable Adults Protection representative for DMI overall. In his/her absence, the responsibility falls to the Director of Operations and Finance who is responsible for the day to day implementation of this policy. For DMI activity outside the UK but where DMI has a permanent presence, the responsibility for implementing this policy lies with the relevant Country Director (or equivalent) For activities outside the UK where DMI does not have a permanent presence the responsibility for implementing this policy lies with the most senior role present.

## 3 Policy purpose

DMI recognises that the welfare of vulnerable people is paramount and that all people without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

DMI will take any concerns and complaints about abuse or exploitation, whether that be emotional, physical or sexual, very seriously and will take appropriate disciplinary action if necessary. This policy applies to all staff, directors and any volunteers supporting the work of DMI.

The purpose of this policy is:

- To protect children, young people and vulnerable adults that receive or participate in our services
- To provide staff, directors and volunteers with the overarching principles that guide DMI's approach to safeguarding.

DMI believes that no person should experience abuse of any kind. As an organisation we have a responsibility to promote the welfare of all the people we work with and to keep them safe. DMI is committed to undertake activities in a way that protects them.

## 4 Definitions

A **child** is defined as anyone who has not reached their 18th birthday. Children, therefore, means children and young people.

A **vulnerable adult** is someone 18 or over who is unable to care independently for themselves or unable to protect themselves against significant harm or exploitation. This could be due to a physical or learning disability, illness or injury or mental health issues; old age; substance addiction; domestic violence or abuse or other reasons, such as poverty. It can be a temporary or a permanent condition.

For the remainder of this document, the term '**vulnerable people**' will be used to refer collectively to children and vulnerable adults, differentiating where necessary.

The **protection of vulnerable people** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children or adults who are suffering, or are at risk of suffering, significant harm.

**Abuse and exploitation** can be physical, sexual, and/or emotional.

## 5 Legal framework

This policy has been drawn up based on law and guidance that seeks to protect vulnerable people, including the following references:

- Children Act 1989 (UK law)
- United Nations Convention on the Rights of the Child 1991
- Data Protection Act 1998 (UK law)
- Sexual Offences Act 2003 (UK law)
- Protection of Freedoms Act 2012 (UK law)
- Relevant (UK) government guidance on safeguarding children
- UN Secretary General's Bulletin Special measures for protection from sexual exploitation and sexual abuse October 2003

## 6 Safeguarding principles

DMI recognises that all people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have an equal right to protection from all types of harm or abuse.

DMI also recognises that some people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

DMI will seek to safeguard the people we work with from harm by:

- a. Valuing them, listening to and respecting them
- b. Adopting protection practices through procedures and a code of conduct for staff, directors and volunteers
- c. Providing effective management for relevant staff, directors and volunteers through supervision, support and training
- d. Recruiting staff, directors and volunteers safely, ensuring all necessary checks are made
- e. Sharing information about protection and good practice with staff, directors, volunteers and our partners
- f. Sharing concerns with agencies who need to know

## 7 Child protection policy

DMI does not routinely work with children in the UK. If a need to work with children in the UK arises, a decision about whether to proceed will be made at CEO level before any work takes place and a risk assessment will be carried out.

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DMI staff working outside the UK may occasionally need to hold interviews or group discussions with children. Usually as part of the formative research process. If a need for DMI staff outside the UK to interact with children or vulnerable adults arises, the Country Director (or equivalent) should be informed before any work takes place and a risk assessment carried out.

### 7.1 Inclusion of children in research

Inclusion of children in research interviews and group discussions needs to be justified and should only take place when:

- a. the unique viewpoint of children is required to inform the work of DMI, and,
- b. the required information cannot be provided by adults.

In any instance when interviewing children, oral assent from both the parent and the child should be obtained. If children are routinely expected to be part of research interviews this should be reflected in the ethics protocol and specific measures to safeguard children implemented.

### 7.2 Inclusion of children in creative work

Inclusion of children in recordings for radio/tv and other creative **purposes needs to be justified and** should only take place if there are no alternative options for recording the required sounds or noises.

In any instance when using children in recordings or other creative purposes, DMI staff must explain to the parent or guardian how the recording will be used. The parent or guardian in charge of the child must give informed written consent and the child must give oral assent prior to the child being able to take part in the recording. Children visiting DMI's radio studio or any DMI office should always be accompanied by a parent or guardian.

### 7.3 Use of children's images

When photographing or filming a child for work related purposes, DMI staff must:

- a. Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images
- b. Before photographing or filming a child, obtain consent from the child or a parent or guardian of the child. As part of this DMI staff must explain how the photograph or film will be used
- c. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- d. Ensure images are honest representations of the context and the facts
- e. Ensure file labels do not reveal identifying information about a child when sending images electronically.

If DMI staff have concerns about a child's safety or welfare or concerns about the actions of a staff member or volunteer, they should report their concerns to the relevant Country Director (or equivalent); the Director of Operations and Finance (DMI UK) or the CEO. Any reported incident will be investigated and recorded in a confidential electronic folder and kept for 36 months.

## 8 Prevention of sexual exploitation and abuse

DMI will adhere to the following principles for protection from sexual exploitation and sexual abuse:

- a. Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal;
- b. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defence;
- c. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance;

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- d. Sexual relationships between DMI staff, directors or volunteers and beneficiaries of assistance undermine the credibility and integrity of the work of DMI and are strongly discouraged;
- e. Where a DMI staff member, Director or volunteer develops concerns or suspicions regarding sexual exploitation or sexual abuse by a fellow worker, he or she must report such concerns via established reporting mechanisms (including the mechanisms described in DMI's Whistleblowing policy);
- f. DMI staff, directors and volunteers are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop such systems. We expect partner organisations that we work with to apply a similar approach

In order to implement these principles, DMI commits to:

- a. Incorporate our policy on sexual exploitation and abuse in induction materials and training courses for our employees and in other relevant organizational codes of conduct.
- b. Respond to any complaints in accordance with our Disciplinary and Grievance Policies
- c. Establish and ensure that complaint mechanisms for reporting sexual exploitation and abuse are accessible and that reports received are confidential
- d. Take appropriate action to the best of our abilities to protect persons from retaliation when allegations of sexual exploitation and abuse are made in good faith.
- e. Investigate allegations of sexual exploitation and abuse involving DMI staff in a timely and professional manner, and to the best of our ability
- f. encourage any relevant partner organisation to do the same. This includes the use of appropriate interviewing practices with complainants and witnesses, particularly with children. We will engage professional investigators or secure investigative expertise as appropriate.
- g. Take swift and appropriate action, including legal action when required, against DMI staff who commit sexual exploitation and abuse. This may include administrative or disciplinary action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.
- h. Provide basic emergency assistance (medical, legal) as appropriate and feasible to complainants of sexual exploitation and abuse
- i. Ensure that when engaging in a partnership, subgrant or subrecipient agreements, we
  - i. incorporate this Safeguarding Vulnerable People Policy as an attachment;
  - ii. expressly state that we expect those entities or individuals, as appropriate, to apply similar preventive measures against sexual exploitation and abuse, to investigate allegations thereof, and to take corrective actions when sexual exploitation or abuse has occurred,

## 9 Training

All staff working with children are monitored and supervised and are given opportunities to learn about child protection in accordance with their roles and responsibilities.

DMI acknowledge that the relevant members of staff need training to enable them to put this policy into practice. Responsibility for ensuring that DMI staff who interact with vulnerable people have received adequate training and are conversant with this document lies with the Director of Operations and Finance (DMI UK), who will delegate responsibility through line managers.

## 10 Allegations made against workers or management

The guidelines in this document and the code of conduct below not only safeguard vulnerable people but DMI staff from allegations of abuse. Staff members should be conversant with the guidelines and implement them in their working practice. Failure to adhere to the code of conduct will lead to disciplinary and grievance procedures.

Any allegations made by a child or parent against a member of staff, a Director or a volunteer will be taken seriously, and will be reported to the appropriate authorities. Any staff member who has an allegation made against them will be suspended immediately (following consideration of the allegation by the CEO and the Director of Operations and Finance (DMI UK) or the Country Director (or equivalent), as appropriate). They will remain on suspension until the allegations have been investigated. If any allegations are proven, the staff member will be deemed to be guilty of gross misconduct and the appropriate disciplinary measures implemented.

Records of safeguarding investigations will be held indefinitely.

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**Annex A: Record of updates and amendments**

<b>Date</b>	<b>Author</b>	<b>Page(s)</b>	<b>Comments</b>
Jun 18	Doug Harper	All	Updated formatting - no policy changes
May 19	Doug Harper	8	Added record keeping period as per DfID requirements
Jun 20	Megan White	All	Updated branding. Corrected UN Convention title, remove section 10 as covered by DMI's Code of Conduct