

Safeguarding Policy



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Picture credits

Cover, left: Team Kenya
Cover, right: Send a Cow

1. Mission Statement

At MannionDaniels we believe that everyone has the right to live free from abuse of any kind. We will not tolerate abuse in our workplace or related to any aspect of our work.

MannionDaniels recognises that abuse comes about as a result of an imbalance of power. MannionDaniels recognises that this power imbalance could happen between work colleagues. We also recognise our relative position of power in our working relationships with downstream partners (grant-holders and grantees) and with the beneficiaries of those downstream partners. MannionDaniels also recognises that grantees and beneficiaries in the developing world may be more vulnerable because there will not be the same framework for safeguarding all individuals, and particularly those most vulnerable, in those countries.

2. Purpose and Scope of Policy

The purpose of this policy is to:

- Provide all employees and associated parties, and downstream partners, with the overarching principles and procedures that direct our approach to safeguarding
- Make every possible effort to protect children and adults who come into contact with MannionDaniels in the course of our work
- Raise awareness of responsibilities for identifying and reporting actual or suspected abuse.

This policy has been developed in accordance with the requirements established by the relevant UK legislation and statutory guidance, based on

¹ MD understands the distinction between “adults” and “vulnerable adults” and recognises the different needs and legislative pathways, for adults deemed vulnerable. We chose to use the generic term “adults” because vulnerability varies drastically by context and all adults should be safeguarded. See Appendix 2 for definitions.

best practice principles (see Appendix 1).

The policy sets out the responsibilities of those who work for and with MannionDaniels. Throughout this policy we refer to the term ‘employee and associated parties’. The term employee refers to MannionDaniels’ staff members. The term ‘associated parties’ refers to consultants, volunteers, interns, secondees, board members and trustees. We will treat any breach of this policy very seriously. For those who work for us, failure to follow this policy could lead to disciplinary action, which may ultimately result in dismissal. For those who work with us, we reserve the right to immediately terminate your contract/association with MannionDaniels.

For downstream partners we provide grants to as a Fund Manager, we are responsible for ensuring they have appropriate safeguarding policies and procedures in place. If they do not, then according to the specific Fund, their grant could be withdrawn, suspended or terminated.

The safeguarding policy should be read in conjunction with all other relevant policies and procedures including, but not limited to the Health and Safety Policy, the Business Code of Ethics, the Equality and Diversity Policy, the Recruitment and New Starter’s Policy, Modern Slavery Policy and the Whistleblowing Policy. They each also consider elements of safeguarding as appropriate.

3. MannionDaniels’ safeguarding responsibilities

We have a responsibility to keep children and adults¹, who come into contact with our organisation in any capacity, safe and we are committed to protecting children and adults in all of our activities. We will do everything in our power to ensure children and adults who come into contact with

MannionDaniels, in any capacity, are safeguarded.

MannionDaniels is responsible for the actions of our staff and any individual we work with, or who works on our behalf. As described above, we use the term 'employee and associated parties' to refer to those working for and with us.

The designated safeguarding lead will be to act on all safeguarding concerns, and MannionDaniels' responsibility is to:

- Respond to the concern as soon as it raised, and within 24 hours of the concern being made
- Take all details of the concern raised and determine the best course of action. The first priority here is to ascertain whether the child or adult in question is still potentially at risk of harm and take action on that issue. The second is to decide what form of investigation or other course of action is relevant
- Take advice from relevant authorities in the countries in question
- Ensure the investigation is carried out as fairly, thoroughly and promptly as possible
- Act on the investigation, including any further action to protect the child or adult in question from harm, and any disciplinary action that may be needed
- Inform the person who raised the safeguarding concern of the investigation findings and actions, as appropriate
- Update the safeguarding incident log and company risk register
- Reflect on the report and investigation as part of regular (monthly) Leadership Team meeting to ensure lessons are learnt and procedures strengthened if needed.

MannionDaniels is responsible for carrying out safeguarding due diligence, of the organisations that we grant funds to, both initially and then for the

duration of the grant through regular monitoring. MannionDaniels uses a multi-staged due diligence process during business development and pre-contracting stages when considering the engagement of business partners (sub-contractors, suppliers, vendors, etc.). We assess the fitness of all potential business partners during the pre-contracting stage, and our safeguarding checks conducted as part of this process are proportionate to each business partner's role. Depending on the nature of planned work, we review the business partner's policies and processes in place to safeguard their own staff and beneficiaries. We also discuss issues that may arise based on work to be undertaken and apply appropriate measures to manage the identified risks, in line with prevailing Company and Client standards.

MannionDaniels is not, and cannot be, responsible for the individual safeguarding of those who work for, or are beneficiaries of, downstream partners (charities and civil society organisations we have granted funds to) other than from abuse by our employees. Our responsibility lies in ensuring the downstream partner has real and effective policies and processes in place to safeguard their own staff and beneficiaries. There will be slightly different but similar processes in place for each fund MannionDaniels manages to ensure we maintain this responsibility to downstream partners. If you are unsure of these requirements, please see the individual websites for each of the specific funds we manage.

4. Safeguarding roles at MannionDaniels

It is the responsibility of every employee and associated party to have read and understood this safeguarding policy.

As an employer, MannionDaniels' role is to ensure the policy is clear and there is adequate and appropriate training for each level of employee or associated party.

All those who work for or with MannionDaniels share the responsibility for safeguarding children and adults, and there are individuals within the organisation with specific safeguarding responsibilities:

Designated Safeguarding Lead:

Rolla Khadduri (rolla.khadduri@mansiondaniels.com)
(to be contacted in the first instance, if possible, for all operational matters)

Deputy Designated Safeguarding Lead:

Sarah Fealey (sarah.fealey@mansiondaniels.com)

Director with responsibility for safeguarding:

Matthew Wiltcher (matthew.wiltcher@mansiondaniels.com)
(to be contacted as a point of escalation and/or for strategic matters)

These specific individuals represent each level of governance: Leadership Team, Senior Management Team and Board Level respectively. They have all received safeguarding training and have dealt with safeguarding cases previously.

We also have a generic email (safeguarding@mansiondaniels.com) and a link to a confidential whistleblowing site (<https://wrs.expolink.co.uk/mansiondaniels>) that allows downstream partners to report more easily, if needed. These are specified on each fund's website as well.

If you are unsure what this policy means, or how it relates to you, please contact the designated safeguarding lead listed previously.

5. Understanding, recognising and preventing abuse

We will seek to keep children and vulnerable adults safe by:

- Valuing them, listening to and respecting them

- Keeping them at the centre of everything we do
- Adopting safeguarding practices through procedures and policies
- Ensuring that the organisations we provide grants to have appropriate safeguarding processes in place
- Providing effective management for employees through supervision, support and training
- Sharing safeguarding information and good practice with staff and the sector.

The categories of abuse for children and vulnerable adults are different. In the interests of simplification, **Appendix 2 includes definitions and categories of abuse in England**. It is important to note that sexual harassment is a form of abuse (a detailed definition of what constitutes sexual harassment is set out in Appendix 2).



Remember

If you think you or someone you know is being abused or neglected through any connection with MannionDaniels, **you should tell one of our safeguarding leads.**

Even if you are not sure it is better to do something than nothing if you have concerns.

Raising concerns about abuse or neglect can be very difficult and distressing for everyone involved. Deciding what the right thing to do is can be stressful, particularly if the person you are concerned about is reluctant or unable to accept support. If you are unsure what to do you should seek advice from one of the safeguarding leads.

5.1 Escalating Concerns

It is important to note that if you raise a safeguarding concern or pass on an allegation, you have a responsibility to ensure your concern is addressed to your satisfaction.

Therefore, if you feel that your concern has not been addressed (and that the child or adult has not been protected) you should escalate the matter to the Director with responsibility for safeguarding.

In the unlikely event that you are not satisfied with the response from the safeguarding lead and then the director with responsibility for safeguarding, your responsibility would be to follow Bath and North East Somerset Safeguarding Children Board escalation procedure, and inform the Safeguarding Board:

https://www.safeguarding-bathnes.org.uk/sites/default/files/lsab.lscb_escalation_protocol_.pdf

5.2 Preventing abuse

What you should do to safeguard children and vulnerable adults:

- Always work in a professional manner following MannionDaniels' business Code of Ethics
- Always be aware of the imbalance of power in working relationships

² This definition of safeguarding incident is based on the Department for International Development's (DFID's) definition. The DFID definition references the Charity Commission's definition of what constitutes a serious incident, both in terms of safeguarding but also in all areas. The definition is as follows: "A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- Harm to your charity's beneficiaries, staff, volunteers or others who come into contact with
- your charity through its work
- Loss of your charity's money or assets
- Damage to your charity's property

- Always be aware of situations which may present risks to children and adults
- Assess, plan and organise your work to minimise these risks
- Always be visible to others when working with children. **There should never be a situation in which anyone employed by, representing, or working with MannionDaniels in any capacity is alone with a child.** You must be accompanied at all times by an appropriate individual (e.g. a project worker, relative, carer or teacher)
- Where possible avoid one-on-one meetings with adults when visiting projects, if unavoidable be aware of the situation and of each of your potential vulnerabilities
- Be clear that confidentiality can never be guaranteed if it is suspected that a child or an adult deemed to be vulnerable is being abused
- Do not take images or film anyone using personal equipment, in your work connected to MannionDaniels, without prior agreement with Mannion Daniels.

5.3 Definition of safeguarding incident²

A safeguarding "serious incident" is an adverse event, whether actual or alleged, which results in, or risks, significant harm to our staff, organisation's beneficiaries, employees or others who come into contact

- Harm to your charity's work or reputation
- For the purposes of this guidance, "significant" means significant in the context of your charity, taking account of its staff, operations, finances and/or reputation.
Reference: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

with our organisation, through its work.

There is no statutory definition of "significant harm" in English law. MannionDaniels has adapted the definition of "harm" from the Children Act 1989.

"Harm" is therefore defined as:

- Ill treatment.
- The impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill treatment).
- The impairment of physical intellectual, emotional, social or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment).

"Ill treatment" includes sexual abuse, neglect, emotional abuse and psychological abuse.

We define abuse in its widest possible terms i.e. as treatment that causes harm to a child or adult. The protection of children and adults is our shared responsibility and if you have any concerns a child or adult is being maltreated, or you have safeguarding concerns about the behaviour of another member of staff or someone working with or for MannionDaniels, do something about it, by following the flow charts set out below.

Since MannionDaniels is a Fund Manager for both UK and non-UK downstream partners, we consider the same definition for all downstream partners (grant-holders/grantees who are charities and civil society organisations).

For UK and international downstream partners and for MannionDaniels itself further clarity can be given as to what constitutes a safeguarding incident:

- Allegation of abusive behaviour made against a MannionDaniels' employee or associated party that has led to a referral by your organisation to and response from the police and/or the local authority, where relevant in the country in which you operate
- Threat of harm to a MannionDaniels' employee or associated party that is work-related, that has led to a referral to and response

from the police and/or the local authority.

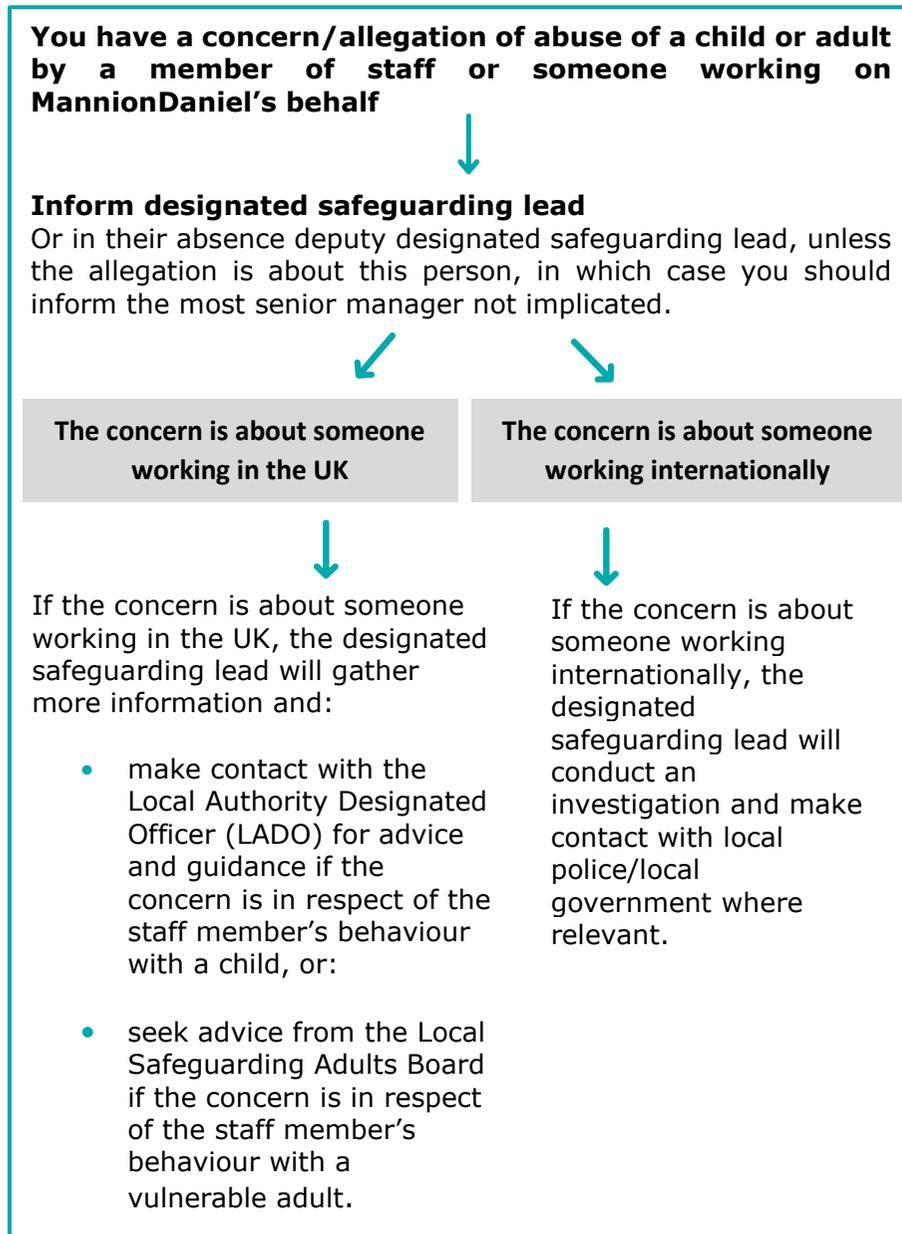
6. What to do if you have a safeguarding concern

If you have a safeguarding concern or wish to make an allegation about an employee or associated party, abusing a child or vulnerable adult – **follow flowchart one.**

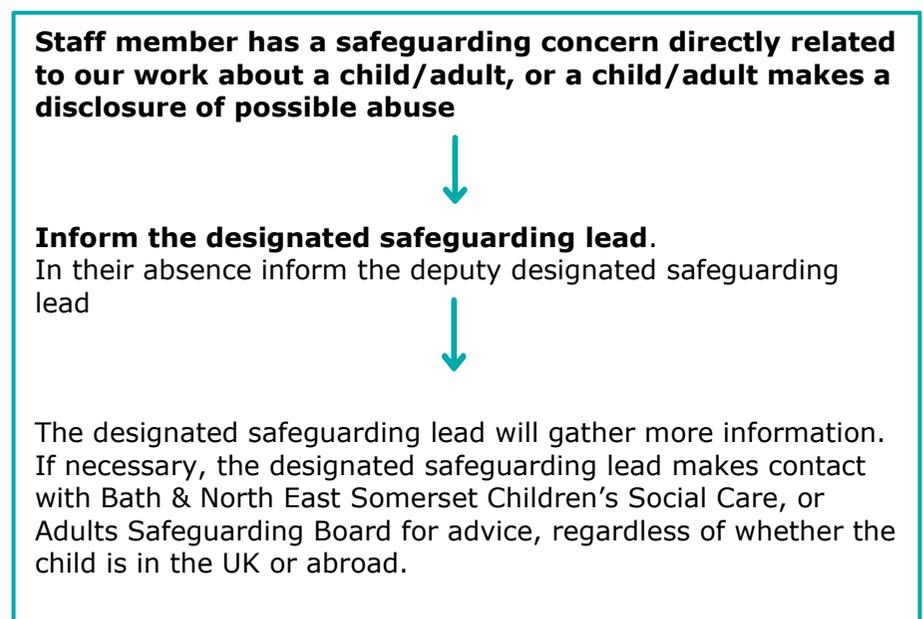
If you have a safeguarding concern about a child or adult you come into contact with through your work, or a child or adult you come into contact with through your work makes a disclosure of possible abuse to you – **follow flowchart two.**

If you have a safeguarding concern about a downstream partner (grantee or grant-holder) – **follow flowchart three.**

Flowchart one



Flowchart two



Flowchart three

Staff member/other party has a safeguarding concern about a downstream partner (grant-holder or grantee)



Inform the director of that fund.

They will take the case forward with the designated safeguarding lead, and donors where appropriate. You can also use the safeguarding@manniondaniels.com email or the Expolink whistleblowing service.



Fund Director and MannionDaniels' designated safeguarding lead works with the Fund-specific project and potentially donors to conduct an investigation and make contact with local police/local government/local social care authorities, where appropriate.

7. Other issues regarding policy

7.1 Information Sharing & Confidentiality

You can never guarantee confidentiality to a child or adult. Information should always be shared if you think a child or adult is suffering, or likely to suffer, abuse.

The protection of children and adults must take precedence over other legal rights. Please be assured that as long as information is shared following the process set out in this safeguarding policy and in good faith that you believe a child or adult is being abused, the law will protect you³. You should ensure that the information you share is necessary for the purpose for which you are sharing it, is shared as per this policy, is accurate and shared promptly.

7.2 Safer Recruitment

MannionDaniels is committed to fair and robust recruitment processes including safer recruitment checks of all employees. We have different levels of security and recruitment checks relative to the safeguarding requirements of our different roles, and the relevant authorities in the in countries where we work. Please refer to the various Human Resources policies for more information if needed (Recruitment and New Starters Policy; Equality and Diversity Policy; Grievance Policy; Disciplinary Policy).

³ There is no one piece of legislation that sets out that child protection overrides everything else but in data protection, human rights and patient confidentiality legislation each one sets out that child protection overrides everything. For further guidance the statutory guidance on information sharing:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

7.3 Training

MannionDaniels provide mandatory safeguarding training at induction, and then regularly to all levels of staff at an appropriate level, at least annually.

7.4 Safeguarding incident log and risk register

The Designated Safeguarding Lead at MannionDaniels maintains a safeguarding incident log that is updated to reflect all safeguarding cases. This is stored in a private space using our online document storage system, and only the three staff with responsibilities for safeguarding have access to it.

This safeguarding incident log feeds into the company risk register that is held by the Director of Operations (Matthew Wiltcher). The risk register is reviewed regularly at Leadership Team meetings which occur monthly and is used to reflect on vulnerabilities and mitigation of those, to reflect and learn from safeguarding incidents, and also to notify outside authorities where necessary.

7.5 Policy schedule and endorsement

This safeguarding policy will be reviewed, approved and endorsed by the board annually or when legislation changes.

Signature, name and date of Director with Safeguarding Responsibilities

A handwritten signature in black ink, appearing to read 'm.wiltcher', is written over a faint, light-colored rectangular stamp or watermark.

Matthew Wiltcher
03 April 2019

Appendix One

Principles

This policy is based on the following principles⁴:

- Everyone has responsibility for safeguarding
- We do no harm
- We have a safeguarding duty of care to beneficiaries, staff and volunteers, including where down-stream partners are part of delivery. This includes children and vulnerable adults in the community who are not direct beneficiaries but may be vulnerable to abuse
- We act with integrity, be transparent and accountable
- All our activity is done in the best interests of the child/vulnerable person - the welfare of children and adults is paramount
- A child is defined as someone under the age of 18 regardless of the age of majority/consent in country
- All children shall be treated equally, irrespective of race, gender, religion/or none, sexual orientation or disability
- Organisations that work with children and vulnerable adults should apply a safeguarding lens to their promotional communications and fundraising activities
- Safeguarding and promoting well-being and welfare means protecting the rights of children and adults to live in safety, free from abuse and neglect
- MannionDaniels recognises the particular vulnerability of children and adults who are deemed to be vulnerable. MannionDaniels uses English law for its definition of a vulnerable adult; defined by the Care Act 2014 as an adult who has care and support needs and is experiencing (or being at risk of) abuse or neglect and they are unable to protect themselves because of those needs
- We recognise that all people, regardless of age, ability, gender, racial heritage, religious belief, sexual orientation, culture or identity, have a right to equal protection from all types of harm or abuse and no person or group of people should be treated less favourably than others in being able to access services which meet their particular needs
- We recognise that some children and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- We will take all concerns, and allegations of abuse will be taken seriously and respond to them appropriately
- MannionDaniels has a commitment to safer recruitment, selection and vetting that includes relevant and proportionate checks, including the Disclosure and Barring Service checks if and when appropriate, into the eligibility and the suitability of all staff
- MannionDaniels has procedures in place which are open and well publicised ways in which anyone can voice concerns about unacceptable and/or abusive behaviour towards children or adults.

⁴ Based on the UK Department for International Development's (DFID's) safeguarding principles.

Appendix Two

Definitions⁵

“Safeguarding” and “Child Protection” in England

In terms of adults The Care Act 2014 defines adult safeguarding as “protecting a person’s right to live safely, free from abuse and neglect”. There are more categories of abuse with adults than there are with children. With adults the categories are physical abuse, emotional/ psychological abuse, financial abuse, sexual abuse, organisational abuse, neglect, discriminatory abuse, domestic violence, modern slavery and self-neglect.

In terms of children, the definition of safeguarding is broader and is set out in “Working Together to Safeguard Children 2018 - A guide to inter-agency working to safeguard and promote the welfare of children”. This is the statutory guidance that sets out the legislative requirements and expectations of individual services to safeguard and promote the welfare of children.

Working Together to Safeguard Children 2018 does not separate safeguarding and promoting the welfare of children. This is the definition:

Protecting children from maltreatment;
Preventing impairment of children’s health or development;
Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
Taking action to enable all children to have the best outcomes

Separate to safeguarding children is “child protection”. Child protection is defined in the Children Act 1989 as where there is “reasonable cause to suspect a child is suffering, or is likely to suffer, significant harm”. The Children Act 1989 introduced significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical abuse, sexual abuse, emotional abuse and neglect are

⁵ For further information on local procedures go to <http://www.bathnes.gov.uk/services/children- young-people-and->

all categories of significant harm. Harm is defined as the ill treatment or impairment of health and development.

In simple terms, safeguarding is the overall well-being of the child and every professional and every organisation is responsible for the safeguarding of children. Within that there is child protection, when it is thought a child is either being maltreated or is at risk of maltreatment.

Age of a Child

A child becomes an adult in law at 18 in the UK, this is in line with the United Nations Convention on the Rights of the Child. Many people use the term “young people” but there is no legal definition for the age of a “young person”. 16 and 17 year olds are children, in legal terms.

Vulnerable Adult

An adult at risk is defined by the Care Act 2014 as a person 18 and over who;

- has needs for care and support (whether or not the local authority is meeting any of those needs) **and**;
- is experiencing, or at risk of, abuse or neglect; **and**
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Local Authority Designated Officer (LADO)

The role of the LADO is set out in Working Together to Safeguard Children 2018 and is governed by the local authorities’ duties under section 11 of the Children Act 2004.

families/child-protection or <http://www.bathnes.gov.uk/services/care-and-support- and-you/concerned-someones-risk-harm-or-abuse>

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

Categories of Abuse in England:

- **Child Abuse**

The categories of abuse of children are set out in the statutory guidance Working Together to Safeguard Children 2018 and are as follows:

- **Physical Abuse**

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- **Emotional Abuse**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate,

or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- **Sexual Abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

- **Neglect**

The persistent failure to meet a child's basic physical and/or psychological

needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

1. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
2. protect a child from physical and emotional harm or danger
3. ensure adequate supervision (including the use of inadequate care-givers)
4. ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Although not specifically a category of abuse extremism is something the UK government is currently very concerned about. As set out in Working Together to Safeguard Children 2018 "Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist".

Adult Abuse

There are ten categories of abuse for adults:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery

- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

For details of types of each kind of abuse and possible indicators, see the following link:

<https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse>

- **Sexual Harassment**

Sexual harassment is unwanted conduct of a sexual nature. It has the purpose or effect of violating the dignity of a worker, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Something can still be considered sexual harassment even if the alleged harasser didn't mean for it to be. It also doesn't have to be intentionally directed at a specific person.

Experiencing sexual harassment is one of the most difficult situations a worker can face. All workers are protected from sexual harassment in the workplace. This applies to one-off incidents and ongoing incidents. This protection comes from both employment law and criminal law, depending on the circumstances involved⁶.

⁶ <http://www.acas.org.uk/index.aspx?articleid=6078>