

## **CIFF SAFEGUARDING POLICY**

### **POLICY STATEMENT**

At CIFF, we are committed to recognising, promoting and protecting the rights of all children and adults at risk. We uphold and promote the core values of:

- prioritising the welfare and best interests of children and adults at risk;
- seeking to do no harm; and
- participatory safeguarding where the views of staff, partners and those who our funding supports are central to the development of safeguarding practices.

We recognise that, as an internationally recognised grant-making foundation, we have a responsibility, along with our Partners, to ensure that those we serve do not suffer harm, abuse or exploitation of any kind. We also acknowledge our role in embedding safeguarding within the grant-making ecosystem alongside other foundations and funders.

Our policy sets out i) our commitments to safeguarding within CIFF and our requirements of CIFF Personnel, reflecting our contact with children and adults at risk, and ii) our expectations of our Partners – many of whom work directly with children and adults at risk – as part of our funding to them. It also sets out our processes for reporting of incidents and investigations.

We seek to achieve these commitments through rigorous enforcement of this policy in our investment design, our grant-making processes and systems, as well through training, communities of practice (like the Funders Safeguarding Collaborative) and our relationship with partners.

In line with the United Nations Convention on the Rights of the Child and the Universal Declaration of Human Rights, we recognise and embrace that everyone has a right to protection and freedom from abuse and exploitation, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. CIFF strives to develop and communicate safeguarding policies and practices that are inclusive and easily accessible for everyone, and we support our partners to do the same.

## 1. CIFF'S SAFEGUARDING COMMITMENT

### 1.1 Awareness: We commit to:

- a) Ensuring that CIFF Personnel understand what safeguarding is, what are the risks to children and adults at risk who are supported by CIFF's partners/grantees, and how to support partners to safeguard effectively;
- b) Ensuring that CIFF Personnel have read, understood, been trained on and agree to uphold this policy and Code of Behaviour at Annex 1 before commencing employment / contracted work/ appointment;
- c) Ensuring that CIFF Personnel know where to access this policy and that it can be easily found on the CIFF intranet and website <https://ciff.org/about-us/safeguarding-child-protection-policy/>;
- d) Ensuring that in all of our operations and activities we are doing no harm and adhering to the rights of all children and adults at risk who come into contact with CIFF;
- e) Sharing this policy and safeguarding lessons learnt with the broader donor community with whom CIFF operates;
- f) Updating this policy every three years, or sooner if there are major changes to CIFF as an organisation, or legislative changes pertaining to safeguarding.

### 1.2 Prevention: We commit to:

- a) Working with partners to ensure they also uphold strong safeguarding procedures and practices by having clear requirements and continuously discussing safeguarding with all partners or potential partners ensuring that they take their obligations seriously;
- b) Working collaboratively with our partners to promote child safeguarding best practices and actively prevent any form of child abuse in CIFF's work;
- c) Having robust recruitment and selection processes to check that, to the best of our knowledge, all CIFF Personnel are safe to do work for CIFF (regardless of whether or not contact with children will actually take place);
- d) Having safe storage of all confidential material, including material with personal data, in line with applicable legislation and CIFF policies.

### 1.3 Reporting: We commit to:

- a) Having a reporting procedure that is easy to use, including an anonymous reporting procedure, and supporting partners/grantees to also have this in place;
- b) CIFF Personnel being clear what to do when child protection concerns, or disclosures arise;
- c) CIFF Personnel knowing who their local DSO is and how to contact them;
- d) All concerns or disclosures being reported to the DSO immediately (within working hours);
- e) All Personnel knowing what steps to take if the concern/disclosure is outside of working hours, they cannot contact the DSO or the concern is regarding the DSO;
- f) Reporting to relevant authorities and regulators (including the Charity Commission of England & Wales) when there is a serious safeguarding incident.

### 1.4 Responding: We commit to:

- a) Ensuring the safety of children and adults at risk is always the first priority and that action is taken to support and protect them;
- b) Applying the principle of 'best interests of the child or adult at risk' to all safeguarding concerns and disclosures;
- c) Taking all concerns and disclosures seriously and fully supporting any CIFF Personnel who in good faith raises his or her concerns;<sup>1</sup>
- d) Handling all concerns and disclosures in a confidential manner, with information shared on a 'need to know' basis;
- e) All incidents being dealt with promptly, and all cases relating to CIFF Personnel being investigated and reported to the Executive Team within one month of being reported to the DSO.

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<sup>1</sup> No form of coercion, intimidation, reprisal or retaliation against any CIFF representative who reports any suspected form of abuse or exploitation is tolerated. See also CIFF's Whistleblowing Policy in the CIFF Staff Handbook and CIFF's Whistleblowing statement on its website: <https://ciff.org/document/ciffs-whistleblower-policy/>.

**1.5 Training and Education:** We commit to:

- a) Providing robust safeguarding training by design, to all new CIFF Personnel, within three months of starting with CIFF;
- b) Providing regular annual refresher training to all CIFF Personnel;
- c) Ensuring CIFF Personnel who have specific responsibilities for keeping children and adults are risk safe (including DSOs) have access to specialist advice, support and regular opportunities to update their skills and knowledge;
- d) Providing staff with access to materials, resources and updates that support understanding and implementation of the policy and will also encourage sharing of experiences and examples of good practice in implementing the policy across CIFF.

**2. EXPECTATIONS ON OUR PARTNERS TO SAFEGUARD**

The safeguarding and protection of children and adults at risk is a non-negotiable in all projects and programmes funded by CIFF. Therefore, it is a requirement that all partners:

- a) Have their own tailored Safeguarding Policy appropriate for their activities;
- b) Have appropriate contextualised training procedures and reporting processes, depending on their activities, jurisdictions and level of contact with children or adults at risk;
- c) Sign and adhere to CIFF's Safeguarding and Child Protection Requirements as set out in our standard agreements;
- d) Report all safeguarding incident to CIFF 's Global Compliance Director and relevant authorities and diligently manage them;
- e) Report all safeguarding incidents to CIFF that involve a member of staff, have been reported to protection authorities, and/or have been reported by the media, including where these occur outside of the CIFF-funded project or programme;
- f) Work collaboratively with our Designated Safeguarding Officers (**DSO**) where there are safeguarding concerns or disclosures;
- g) Take any necessary organisational and operational steps to ensure safeguarding is considered and provided for from the outset of the programmes to their end;
- h) Undertake safeguarding by design, monitoring, evaluation, accountability and learning procedures in their programmes, activities and operations;
- i) Flow-down these requirements to their personnel, partners and contractors performing grant activity.

CIFF is committed to working with Partners to ensure programmes have appropriate safeguarding policies and procedures in place, according to the level of safeguarding risk and contact with children or adults at risk. CIFF may assist a Partner with the development and implementation of a safeguarding policy if they do not have one. Once a grant has been approved, CIFF will adopt a collaborative approach and work with Partners to develop and/or strengthen their safeguarding practices and may provide additional support, both in terms of capacity and grant funds to assist with this.

Once a CIFF-funded project or programme begins, CIFF will have open and regular dialogue with the Partner regarding safeguarding throughout the life of the programme and will monitor its effectiveness in the programme reviews and regular reporting.

If a concern or disclosure of abuse is reported to a Partner, the Partner will address it in accordance with its own safeguarding policy and national laws. The Partner must also advise their local CIFF DSO or Programme Manger within 3 days of the knowledge of the concern or disclosure. Partners are expected to provide regular updates to CIFF as to the status of any investigation and the outcome of the process. At any time, CIFF can request an independent audit of any grantee organisation, project or programme in relation to safeguarding.

Should any partner fail to deal with safeguarding issues in line with their policy or their agreement with CIFF, CIFF may terminate the grant agreement and any funding arrangements with immediate effect and, where appropriate, report the Partner to relevant authorities.

**3. REPORTING AND RESPONDING TO SAFEGUARDING INCIDENTS**

**3.1 Principles:** CIFF upholds the following principles throughout the duration of a safeguarding incident (actual or alleged), and supports Partners to do the same:

- a) Protecting the best interests of children and adults at risk, with a recognition that there may be additional (as yet unknown) survivors;
- b) Doing no further harm throughout the duration of the case and after its closure;
- c) Providing support to the survivor and where possible, involving the survivor in decisions that affect their lives;
- d) Protecting the confidentiality of the reporter, survivor and subject of complaint, only sharing information on a need-to-know basis (for example, with protection authorities);
- e) Where necessary, making operational and programmatic changes to ensure programmes and organisations mitigate the actual safeguarding risks after safeguarding incidents;
- f) Any report should include, as far as possible, only facts. In the case of direct disclosure of alleged child abuse, the language used by the person disclosing should be recorded as closely as possible;
- g) Handling all allegations regarding CIFF Personnel and Partners equitably and transparently (with due regard to confidentiality) irrespective of whom they are made against and taking into account the rights of the parties involved. Whilst aiming to make fair, fact-based decisions, CIFF will always prioritise the well-being of children and adults at risk in its decision-making;
- h) Reporting such incidents to relevant law enforcement authorities and regulators as required by applicable laws.

### **3.2 Safeguarding incident relating to CIFF Personnel:**

- a) An internal Investigation Committee (consisting of the Chief Administrative Officer, the Executive Director – People and any other relevant Executive Director) will be established;
- b) The individual may be immediately suspended from their employment or contract without prejudice, whilst the investigation takes place. Where feasible, a decision as to whether the individual can return to work, be dismissed or further time to make a decision is required, will be made by the Investigation Committee within 28 days. In some cases, particularly where local authorities are involved, more time may be required before a decision can be made;
- c) The individual will be subject to disciplinary action in accordance with CIFF's Disciplinary Procedures which may include dismissal or termination of contract and reporting the concern/disclosure to relevant safeguarding authorities;
- d) Any whistle-blowers shall be provided the benefit and protection of CIFF's whistleblowing policy and, where appropriate, CIFF may provide access to relevant support services, including trauma-informed therapy where appropriate;
- e) CIFF may also seek advice from legal experts in-country, and where necessary, contract an external investigator to lead on the case including conducting an internal investigation.

### **3.3 Safeguarding incident relating to CIFF Partner or beneficiary or programme;**

CIFF requires all Partners to inform CIFF within three (3) days of the incident being made. Where the Partner chooses to seek advice or support from CIFF regarding an incident, CIFF will support the Partner to investigate all incident in line with their safeguarding policy and local legislation. The Partner, having consulted with CIFF, may decide to:

- a) Internally investigate the incident;
- b) Report the incident to a local children's protection services;
- c) Report the incident to the police particularly if someone is or may be in immediate danger;
- d) Report the outcome of the investigation to relevant external bodies such as the criminal records bureau and/or Charity Commission of England & Wales or equivalent in other geographies;
- e) Where CIFF has concerns that a Partner is not following best practice, CIFF may take independent action in line with this Policy and their agreement;
- f) Where deemed necessary or appropriate (such as cases of serious harm to a child) the Board of Trustees will be informed;
- g) Any whistle-blowers shall be provided the benefit and protection of CIFF's whistleblowing policy and, where appropriate, CIFF may access to relevant support services, including trauma-informed therapy where appropriate.

Should any partner fail to deal with safeguarding issues in line with their policy or their agreement with CIFF, CIFF may request additional safeguards for the programme/organisation in order to prevent future incidents, or terminate the grant agreement and any funding arrangements with immediate effect and, where appropriate, report the partner to relevant safeguarding authorities.

#### **4. Media and Communications:**

We acknowledge that child abuse, including exploitation can occur through the use of information technology, such as when children are photographed or filmed in an inappropriate way. We:

- a) Prioritise the rights and wellbeing of the children sharing their images or stories with CIFF;
- b) Share stories of children using positive strength-based language and ensure that no child is dehumanised or put at risk by the way while sharing their story;
- c) Obtain informed consent from the child and the parents/guardian before taking a photograph, video or audio recording and ensure that an explanation as to how, where, when and for how long the photo or film will be used is provided;
- d) Take care to assess local traditions or restrictions for reproducing personal image and endeavour to comply with them;
- e) Ensure that no pictures of children that can be interpreted as sexualised or degrading or shaming in any way shall be published by CIFF or CIFF Personnel;
- f) Ensure that no personal data or sensitive information about any individual child that could compromise their care or protection is disclosed in publications or other materials, including surnames or any specific location details;
- g) Ensure that pictures, materials and personal information regarding children are held in a secure place, whether physical or online and any lost or stolen equipment containing material should be reported immediately to the local DSO and to CIFF's IT Director;
- h) Report and record any complaints or concerns about inappropriate or intrusive images as a safeguarding concern.

#### **5. Monitoring and Review:**

##### **5.1 With Partners:**

- a) CIFF prioritises the monitoring and evaluation of proactive approaches to keeping children and adults at risk safe and responding to safeguarding concerns protection concerns and disclosures;
- b) CIFF requires that safeguarding is evaluated on a regular basis as agreed between CIFF and the partner. Safeguarding must be included in regular grantee reporting and evaluation;
- c) CIFF may request further information based on evaluation reports. Reasons for this may be (1) high numbers of safeguarding cases (2) no reported safeguarding cases (3) other reasons as specified by CIFF.

##### **5.2 Internally, CIFF will:**

- a) Monitor compliance of this policy within CIFF and evaluate the effectiveness of this policy through regular checks, including quarterly reports to the Board detailing the number of incidents or concerns of safeguarding reported as well as any significant safeguarding updates;
- b) Commit to review this policy regularly where there are changes in legislation or within the organisation that affect this policy.

This policy has been approved by the Board and came into effect on 20 February 2018.

##### **Policy Updates:**

- November 2018
- Last updated 5 October 2023.

## ANNEX 1 – CODE OF BEHAVIOUR

CIFF is committed to recognising, promoting and protecting the rights of children and adults at risk. CIFF believes that the welfare of children is the highest priority and that it is the responsibility of everyone who works for CIFF and with CIFF to ensure that children are protected from exploitation or abuse.

CIFF Personnel are expected to treat all children and adults at risk with respect and dignity, prioritising their safety and well-being at all times. As we expect the highest standard of behaviour from all CIFF Personnel, this Code of Behaviour applies both in private and professional lives.

As a CIFF representative you **must**:

- Act in a way that seeks to care for and protect the rights of children and act in their best interests
- Always treat children with respect regardless of their sex, age, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation, gender identity or other status
- Immediately report concerns or disclosures of child exploitation and abuse and policy non-compliance in line with the CIFF Reporting Procedure
- Disclose any child related convictions or investigations you have been subject to which occurred before or during your association with CIFF

As a CIFF representative you **should**:

- Be aware of situations which may present risks and manage, plan and organise the work so as to minimise risks
- Ensure that another adult is always present when working in the proximity of children
- Ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed
- Seek advice from your Designated Safeguarding Officer if you are concerned about a child, even if it doesn't appear significant, such as something not seeming quite right or making you feel uncomfortable

As a CIFF representative you should **never**:

- Use language or behaviour towards children that is inappropriate, harassing, abusive, sexual, provocative, demeaning or culturally inappropriate
- Discriminate children by any means
- Act in ways intended to shame, humiliate, belittle or degrade children or otherwise perpetrate any form of emotional abuse
- Form an intimate relationship with a child or any other relationship that could in any way be deemed exploitative or abusive
- Engage children under the age of 18 in any form of sexual activity, including showing a child sexual images, asking a child to take or show you sexual images and/or using sexualised language and/or sexualised behaviour in front of a child
- Invite unaccompanied children into a private residence
- Sleep in the same room as unsupervised children without a second adult being present
- Condone, or participate in, behaviour of children which is illegal, unethical, unsafe or abusive
- Condone abusive activities between children such as initiation ceremonies or bullying
- Use computers, mobile phones, video cameras or social media to exploit or harass children or access child exploitation material through any medium
- Befriend children who you come into contact with through work on social media
- Use physical punishment on children
- Hire children for domestic or other labour
- Photograph or film children without consent or use images not respecting their dignity

This is not an exhaustive or exclusive list. The principle is that CIFF Personnel should avoid actions or behaviour which may constitute poor practice or (potentially) abusive behaviour. Whilst "children" for the purposes of this policy means children under the age of 18 years, the Code of Behaviour also applies to CIFF Personnel's interactions with any young person of or over the age of 18 who is connected with a CIFF-funded programme.

I have read the above Code of Behaviour, understand it, and agree to comply with it:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Role title: \_\_\_\_\_

## **ANNEX 2 – RESPONSIBILITIES**

### **Trustees**

CIFF's Board of Trustees have ultimate responsibility for safeguarding. To enable them to fulfil this function we ensure that:

- Safeguarding is a standing agenda item at every Board meeting and incidents are presented to the Board.
- Trustees have had safeguarding training and refresher training on a regular basis.

### **Safeguarding Trustee**

- Champion a safeguarding culture at the Board level and throughout the organisation.
- Provides strategic leadership to the organisation on safeguarding.
- Ensures that the policy and its implementation remain effective and fit for purpose.

### **Safeguarding Lead**

- Owns the policy, its implementation and that it is effective and in line with recommended best practice.
- Acts as a focal point to receive, record and assess information in relation to safeguarding including incidents.
- Report to and advises the General Counsel and the Executive Team on all Safeguarding matters.
- Increase knowledge and understanding of safeguarding and child protection matters, especially where changes or updates to relevant best practice recommendations, legislation or other amendments are recommended.

### **Designated Safeguarding Officer**

- Acts as a focal point to receive, record and assess information in relation to including in their offices (and consult with others including local protection agencies and local authorities).

### **Investigation Committee**

- Undertakes full, objective and diligent investigation into safeguarding concerns/disclosures.

### **Human Resources**

- Undertakes safe recruiting and selection practices including:
  - checks, such as Disclosure and Barring Service (DBS) checks, for all CIFF Personnel,
  - behaviour based interviewing, specific questions on safeguarding in interviews to understand individuals' attitudes to safeguarding,
  - conduct misconduct disclosure scheme checks for all personnel,
  - provision of a self-disclosure form,
  - reference checks on suitability to work with children.
- Working in conjunction with CIFF DSOs and any external authorities and legislation where a concern or disclosure is raised about a CIFF Personnel.

### **Legal & Compliance**

- Training and advice for all staff covering how to:
  - proactively safeguard children and adults at risk,
  - work with partners to promote safeguarding, identify challenges, concerns and solutions, and investigate concerns or disclosures,
  - recognise, respond to, report and record abuse in line with this policy,
  - recognise safeguarding risks in CIFF grant-making, Partners and projects,
  - ensure they are appropriately knowledgeable, skilled and confident in meeting their safeguarding protection responsibilities.

### **Programme Managers Responsibilities**

- Assess with potential Partners safeguarding from the design of programmes and projects.
- Ensure that Partners have tailored and adequate safeguarding policies and mechanisms according to the level of contact with children or adults at risk. If the contact is high or the safeguarding risk is high, the programme must include safeguarding in the risks along with the actions to mitigate the risks.
- Engage with the Legal & Compliance Team to provide safeguarding support to the partners and programmes when needed.
- Discuss safeguarding and protection with new potential partners.
- Review safeguarding policies of grantees and provide assistance and improve if required.

- Ensure safeguarding is included in the life of the project from start to end including project monitoring and evaluation.

**All Staff**

- Attend training and understand obligations.
- Sign and return Code of Behaviour.
- Complete the safeguarding training.
- Report any child related convictions, investigations or allegations that have been made against them to the DSOs.



### **ANNEX 3 – DEFINITIONS**

**Child:** anyone under the age of 18 (as per the United Nations Convention on the Rights of the Child).

**Adult at risk:** anyone aged 18 or over who is in need of protection and unable to protect themselves.

**Safeguarding:** CIFF's proactive measures to protect the health, well-being and human rights of individuals, which allow people, especially children, young people and adults at risk to live free from abuse, harm and neglect. CIFF also support partners to do the same.

**Abuse:** could be physical, sexual, emotional violence and/or neglect. Abuse can be online and/or in-person. Adults and children can perpetrate abuse, including adults in positions of power (such as teachers, family members, doctors, NGO workers – not this list is not exhaustive).

**Exploitation:** persuading, threatening or blackmailing someone into doing something, often through the exchange of goods or money. Exploitation is often sexual but can also include exploiting someone to commit illegal acts such as trafficking or illegal labour.

**Partners:** organisations we work with and support through our funding.

**Child protection:** *responding* to concerns and/or disclosures that a child may be experiencing or be at risk of physical and/or mental violence, injury and/or abuse, neglect and/or negligent treatment, maltreatment and/or exploitation, and/or sexual abuse.

**CIFF Personnel:** all CIFF employees, contractors, trustees, consultants, fellows, advisors, interns and volunteers.