

Choose Love's Safeguarding Policy

CHOOSE LOVE

Choose Love
(A Collective Fund under Prism the Gift Fund)

20 Gloucester Place, London, W1U 8HA

Policy	Date of Approval by CL Board of Directors	Date of policy review
Safeguarding Policy	January 2021	January 2022
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1. Introduction

The purpose of this Safeguarding Policy is to protect people from any harm that may be caused due to their coming into contact with Choose Love. This includes harm arising from:

- The conduct of Choose Love’s staff, and our partners.
- The design and implementation of Choose Love’s projects and activities.

Choose Love has in place a Safeguarding Framework comprising four standards: Safeguarding, People and Partnerships, Risk Management and Accountability. This Safeguarding Policy contributes to the first of these four standards: Safeguarding, together with Choose Love’s Code of Conduct. Each of the four standards has policies within them, which, together, create a comprehensive safeguarding framework. Choose Love’s policies are publicly available. Please note that the definitions used in the policy are contained within Appendix 2.



Choose Love’s safeguarding framework has been developed in response to its rapid growth since its inception in 2015 and provides a strong foundation upon which the organisation can manage its future growth. It is the result of an internal review and input from Choose Love’s stakeholders, including partners, and represents our commitment to promoting and nurturing a strong safeguarding culture in all aspects of our work.

Choose Love’s approach to Safeguarding

Choose Love is aware of societal structural inequalities that disadvantage minority and marginalised individuals and communities, and of the power imbalance that exists between us, our partners and the communities supported by our work. These power differentials further complicate safeguarding considerations when working to protect communities on the move. Choose Love recognises that many of the people we work with, although vulnerable because of their circumstances, also have personal agency and resilience. Therefore, Choose Love’s approach to safeguarding its ultimate beneficiaries and their wider communities is not only focussed on protecting them from harm, but also on supporting them to contribute to the projects run by partners in ways which empower them and support their safety and wellbeing.

We acknowledge and seek to respond to the challenges faced by grassroots and civil society organisations. When organisations fill the gaps left by large INGOs and governmental bodies, or work in spaces without formal protection mechanisms, formal reporting routes for safeguarding incidents are often lacking]. Choose Love is committed to supporting our partners, ensuring that work is done to the highest possible standards, and that the safety of the communities we support is paramount in all we do. Our work in particularly high-risk areas, such as Lebanon, for example, is subject to continuous review.

Choose Love recognises the risk that poor safeguarding practice pose to Choose Love's partners and to Choose Love's , as an organisation entrusted with funds donated by the public. Choose Love operates as a collective fund under our affiliated charity, Prism the Gift Fund, through which all serious incidents are reported to the Charity Commission. Choose Love independently reports all serious incidents to its major donors.

A Serious Incident

Choose Love defines a serious incident in line with the Charities Commission definition as '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 (who are collectively referred to throughout this guidance as people who come into contact with your charity through its work)
- loss of your charity's money or assets
- damage to your charity's property
- harm to your charity's work or reputation'

Examples of what constitutes a serious incident in relation to safeguarding can be found in section 8.2 below.

Contact Us

To contact Choose Love regarding any of the information in this document please contact Dee Jethwa or Geoffrey Cordell, Choose Love's Interim Designated Safeguarding Leads, here: safeguarding@choose.love. If the Designated Safeguarding Officer is unavailable or your concern relates to the Designated Safeguarding Officer, you can report your concern to the Safeguarding Lead Director, Nico Stevens, via e-mail at nico@choose.love or telephone +44 7950 491605.

2. Choose Love's Policy Statement

Choose Love's Safeguarding Policy puts the communities we support at the centre of all we do. Choose Love works to the Charity Commission definition of safeguarding. In its guidance, the Charity Commission describes safeguarding as meaning "the range of measures in place to protect people in a charity, or those it comes into contact with, from

abuse and maltreatment of any kind¹. In the NGO sector in general, we understand it to mean taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

In the context of Choose Love specifically however it is necessary to consider that we:

- Are not a charity, but we do work closely with our affiliated charity, Prism, to support it in upholding its safeguarding obligations.
- Do not fund the partners who deliver our projects directly, although we do so through a collective fund management by Prism and we do undertake a role in overseeing and supporting partners' delivery of projects in the field.
- Do not work directly or indirectly with children or at-risk adults at risk, or with beneficiaries, except in a limited range of circumstances where Choose Love provides staff to provide capacity building to partners in the field.

As such, we understand our *specific safeguarding risks* to include, but not be limited to, safeguarding **by** staff/partners, safeguarding **of** staff/partner staff, and of beneficiaries where staff work with such beneficiaries directly or indirectly, and safeguarding **from** staff/partner staff.

Consequently, Choose Love will:

- Take reasonable steps to safeguard and protect all beneficiaries from abuse, even when these are not children and adults at risk.
- Take reasonable steps to protect beneficiaries, staff and all those connected with the activities of Choose Love and who come into contact with it, from harm.

We expect that our partners' working practices represent a commitment to a safe, inclusive, and nurturing safeguarding environment for all. Given the unstable conditions in which many of our partners work, we will strive to help organisations develop policies consistent with these values if possible and will consider providing training or other resources to reinforce the relationship between policy and practice.

We require all staff to report concerns or allegations against any member of our staff, partners and all people associated with our work. We also aim to be approachable for reports to be made directly by beneficiaries or any professional from another organisation.

2.1 The scope of this policy

Choose Love's Safeguarding Policy applies to staff and visitors, including journalists and associated personnel.

A requirement of our due diligence process is that those of our partners implementing projects are required to ensure appropriate safeguarding measures are in place in their

¹ <https://bateswells.co.uk/wp-content/uploads/2019/06/safeguarding-for-trustees-pdf.pdf>

organisations and we expect partners to notify us if a safeguarding incident occurs within their organisation.

2.2. Definitions

Asylum Seeker - An Asylum-Seeker is a person who has left their country and is seeking protection from persecution and serious human rights violations in another country, but who hasn't yet been legally recognized as a refugee and is waiting to receive a decision on their asylum claim.

Beneficiaries - Any person whom we and our partners support. In our daily work, we do not use this terminology, preferring instead to talk about people, some of whom are on the move, displaced or in transit. For the purpose of this policy, and, again in line with Charity Commission guidance, we define a beneficiary as *“a person or group of people eligible to benefit from a charity.”*

Adult at risk - Any person aged 18 or over who is or may be in need of care and support, (e.g., health, personal or social care), is experiencing or is at risk of abuse or neglect and as a result of this is unable to protect themselves from either the risk or experience of neglect or abuse.

Child - any person under the age of 18 (United Nations Convention on the Rights of the Child). This may not always be possible to verify. It is often difficult to know the true age of a person within the context in which we work. There are times when adults can present themselves as a minor and instances when minors present as adults. People who present as minors will be accepted as such until information about their true age is established.

Child Abuse - A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, either wholly, or by its use to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children - Working Together to Safeguard Children, 2018.

Partner: an organisation which receives funding from Choose Love or with which Choose Love's collaborates to deliver its programmes or which is otherwise associated with the Choose Love's name and brand.

Partner staff means employees and directors/board members of a partner, freelance workers (self-employed or agency staff) of a partner, and volunteers, interns and secondees of a partner.

Safeguarding Adults - Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances. There may be instances whereby the risk is so high that referrals for support need to be made without an adult's consent. - Care and Support Statutory Guidance, March 2020.

Safeguarding Children - means protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes. Working Together Safeguard, Children 2018.

Staff means Choose Love's employees and directors, freelance workers (self-employed or agency staff), and volunteers, interns and secondees.

Survivor-centred Approach - The principle of a survivor-centred approach is to view the person who has been on the receiving end of harm, abuse, or exploitation as a survivor, rather than victim. Using the language of victim when talking about sex and gender-based violence (SGBV) can result in presenting the person as not having agency or the power to defend themselves. When we shift to acknowledge this person as a survivor, we see that their identity is not shaped by the violence or harassment that has happened and see that they have survived the incident. A survivor-centred approach means that we prioritise the rights, needs and wishes of the survivor. We aim to create a supportive environment in which the survivor's rights are respected and in which they are treated with dignity and respect.

Unaccompanied Child (UAC) - An unaccompanied child is a person who is under the age of eighteen, unless, under the law applicable to the child, majority is, attained earlier and who is "separated from both parents and is not being cared for by an adult who by law or custom has responsibility to do so."²

Refugee - A Refugee is a person who has fled their own country because they are at risk of serious human rights violations and persecution there. The risks to their safety and life were so great that they felt they had no choice but to leave and seek safety outside their country because their own government cannot or will not protect them from those dangers. Refugees have a right to international protection. Another term, which we use throughout our work, is displaced person. Note, an internally displaced person is someone who is forced to flee his or her home but who remains within his or her country's borders.

² <https://www.unhcr.org/3d4f91cf4.pdf>

A list of categories of abuse for children and adults at risk to be referred to when assessing allegations of harm along with key terminology commonly associated with safeguarding can be found in Appendix 2.

3. Our work

In an ever-shifting global political context, the situations in which Choose Love and our partners work are often unstable. As humanitarian work with refugees and displaced persons is becoming increasingly criminalised, and the communities we support are socially excluded and without recourse to adequate legal protection, we acknowledge the potential for abuse and exploitation and the extreme challenges in keeping people safe.

We work in a spirit of solidarity with our partners, communities, and beneficiaries without compromising the need for safety and protection. We seek to protect the rights and uphold the dignity and humanity of all those whom we reach. We recognise and respect individuals' capacity: we see them as actors in their own development, and we encourage their engaged participation in our work.

We recognise that our partners may come into contact with, or access sensitive information which, if misused, could breach people's privacy, increase their vulnerability, or expose them to potentially dangerous situations. We do everything we can to ensure that sensitive and private information relating to our work and our partner projects is not shared irresponsibly, such as in a public forum or on social media. This includes confidential or personal details of staff or volunteers, information about individuals' cases and records of our work.

Importantly, we work fast, flexibly, and creatively to identify and meet the needs of refugees and displaced people. To save and rebuild lives we work to fund and strengthen the capacity of partners on the ground.

4. Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and adults at risk in the UK, including the Safeguarding Vulnerable Groups Act 2006 and Charity Commission guidance.

5. People and Partnerships

People and Partnerships is one of the four standards of Choose Love's Safeguarding Framework. It comprises Safer Recruitment, Partner Selection and Due Diligence and Community Engagement policies.

5.1. Safer Recruitment

Safer recruitment is an integral part of Choose Love's commitment to build an organisational culture wherein the safety and wellbeing of everyone involved is

paramount. Choose Love's approach to safer recruitment is explained in more detail in our People and Partnerships policy.

Choose Love is fully committed to safe recruitment selection and vetting of potential new staff.

While noting that Choose Love does not usually work directly or indirectly with children or at risk adults, if Choose Love does ever engage in activities that require staff or other representatives to undertake a criminal record or other background check in accordance with relevant legislation, we will ensure that these are carried out as part of our commitment to safer recruitment and safeguarding (for example where recruiting Staff for work in the field).

No member of staff or other representative may undertake activities in relation to Choose Love that involve access to children or adults at risk without supervision unless and until an appropriate background check (which may include a criminal record check, as appropriate) has been completed with satisfactory results.

Where we become aware that any current Staff member may pose a risk to children and/or at risk adults we will comply with the legislation and relevant guidance in respect of referring that representative to the relevant authorities if appropriate³.

Recruitment of Directors will be undertaken in accordance with applicable guidance from relevant local regulators. In England and Wales, this includes guidance issued by Companies House⁴ and Choose Love shall also give reasonable consideration to the guidance of Charity Commission for England and Wales⁵ (although it is not itself a charity) in order to ensure best practice in respect of Director recruitment.

5.2. Embedding a strong safeguarding culture through capacity building

A strong safeguarding culture requires a comprehensive suite of policies, which are regularly reviewed and updated as required, an informed and trained staff team and a clear action plan for commitments made. We make the following key commitments:

- Staff will receive a thorough induction covering all aspects of our safeguarding policies and implementation plan, and they will be introduced to the Designated Safeguarding Officer.
- All staff as well as visitors will sign the Code of Conduct, which clearly lays out the expectations of best practice and our goals for nurturing a safe working environment.
- All staff will receive annual (refresher) safeguarding training.
- Staff with specific safeguarding responsibilities will be trained, informed, encouraged to be approachable and will respond to issues in a professional and timely manner.
- The Safeguarding Policy will be reviewed at least annually by the Designated Safeguarding Officer in collaboration with the Executive Leadership Team and approved by Directors.

³ For example, for more information about making a referral to the DBS please see:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

⁴ <https://www.gov.uk/guidance/being-a-company-director>

⁵ For example, see Charity Commission guidance CC30 *Finding new trustees*:
<https://www.gov.uk/government/publications/finding-new-trustees-cc30>

5.3. Code of Conduct

Choose Love has a Code of Conduct that describes the ethics and behaviours required of all stakeholders to ensure a robust safeguarding environment. It is designed to create a culture of best practice in keeping beneficiaries safe. All staff members, and all those who act on our behalf, as well as visitors will read and sign the Code of Conduct and are expected to adhere to its values and minimum standards. Those making overseas visits are expected to uphold local law wherever they operate, in addition to the Choose Love's Code of Conduct. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.

We expect our partners to have their own internal robust Code of Conduct that clarifies the values, principles, and the acceptable behaviours within their organisation and which should influence and drive the organisation's culture.

5.4. Partnerships

We currently fund over 120 projects in 14 different countries (2020). As part of our due diligence process, we require implementing partners to have their own Safeguarding Frameworks. Partners, as independent organisations, are ultimately responsible for internally dealing with their own safeguarding concerns. As per our grant agreements, we expect serious incidents (including all safeguarding incidents) to be reported to Choose Love. We will then follow procedures outlined in section 8.1 of this policy.

In the first instance, Choose Love will follow a stringent due diligence process for Partner selection, as set out in our People and Partnerships Policy and our Due Diligence Framework. As well as our own internal checks, our affiliated charity, Prism the Gift Fund will carry out a second level due diligence check on partners recommended by Choose Love. The process will cover Financial, Governance, Management and Safeguarding due diligence.

5.5. Community and Beneficiary Engagement

Where possible, our partners must demonstrate a commitment to Community and Beneficiary Engagement through processes that facilitate community representation and feedback mechanisms on the effectiveness of the safeguarding measures that have been put in place. Partners will also be expected to demonstrate arrangements for working together with INGO protection coordination and accountability systems when they are present, along with other relevant authorities. We wish to work closely with partners to establish how these could be strengthened for sustaining safeguarding policies and practices.

Summary of People and Partnerships

Our People and Partnership policy provides full details of our due diligence process. We work with diverse range of organisations and we recognise that these organisations are each at different stages of developing and implementing their safeguarding practices. We

use our due diligence process to assess the safeguarding practices of all Partners and to satisfy ourselves that these are adequate and appropriate in the circumstances, and we work closely with new Partners to improve their capacity to manage safeguarding risks and concerns.

Where it is felt advantageous and in the best interests of Choose Love to work with a partner that does not meet our safeguarding requirements, the following steps are considered -

- Placing additional conditions on the funding awarded to such a Partner.
- Allocating financial support to strengthen the Partner's safeguarding practices.
- Providing additional safeguarding advice and support to the Partner via our Designated Safeguarding Officer, sharing resources and, where necessary, arranging external capacity building support, and
- Conducting a risk assessment and developing a risk mitigation strategy during the period of capacity building.

We will assess the work needed to achieve adequate safeguarding practices (including the cost and the length of time needed to strengthen the partners' capacity). Although it is not Choose Love's responsibility to build a prospective partner to enable them to reach safeguarding compliance, we may choose to do so if we find no other suitable partner to work with, and if we believe working with this partner is crucial to the achievement of programme goals and outcomes.

Monitoring and evaluation of projects and programmes is an important process in the management of funding and relationships. Choose Love strives to build open, trusting, and transparent partnerships with organisations that deliver services to refugees. All monitoring visits will include a discussion around safeguarding to ensure that Partners are implementing their policies and procedures and feel confident about exercising their responsibilities. All evaluation frameworks will integrate safeguarding. All visits to the field will include a meeting with beneficiaries and, if applicable, their representative groups.

6. Risk Management

Choose Love manages the risks associated with its activities in accordance with its Safeguarding Risk Management Policy. This policy deals specifically with the safeguarding risks associated with Choose Love's activities and sets these out in the Safeguarding Risk Matrix along with the controls implemented by Choose Love to mitigate these risks. Staff should refer to the Safeguarding Matrix in order to ensure that Safeguarding risks are managed effectively.

7. Whistleblowing

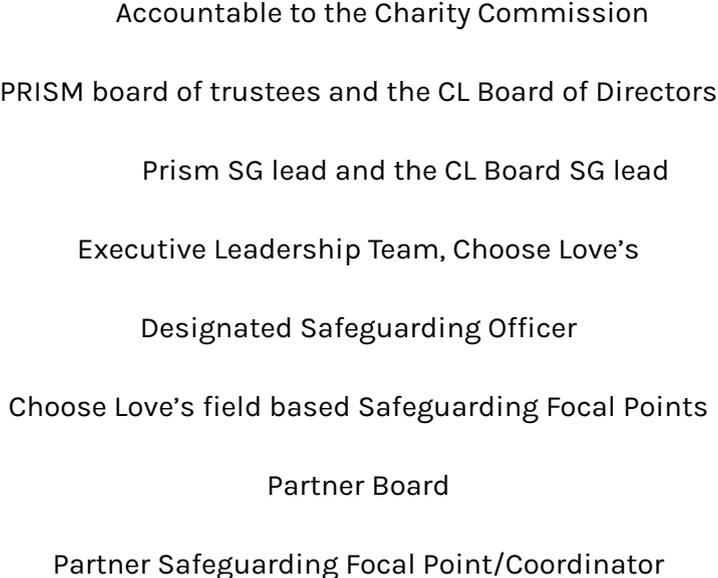
Choose Love's Whistleblowing Policy provides a process whereby the concerns of Staff can be raised and resolved at the appropriate level. The policy elaborates a clear process that is widely understood and accessible to all staff, for dealing with concerns and a handling

framework with identified owners of each step. The policy is explicit that there can be no reprisals for the whistle-blower where concerns are reported in good faith and without malice. It identifies a clear process to follow if the concern is being raised against an individual in the organisation who manages internal complaints or concerns.

8. Reporting and responding to concerns

8.1 Choose Love’s procedure for handling safeguarding concerns

The chart below illustrates the reporting line from our Partner’s in the field through to Choose Love’s Safeguarding Focal Points, Safeguarding Office, and Directors and to the Prism board of trustees’ responsibility to the Charity Commission.



The Choose Love’s Board of Directors that is responsible for informing Choose Love’s donors of safeguarding concerns and the Prism Board of Trustees is responsible for reporting the Charities Commission as required.

A detailed version of our reporting routes is available [here](#).

No concern is too small. If you are unsure whether a situation constitutes a safeguarding concern, and if you are based in the field office you are encouraged to contact the Safeguarding Field Focal Point. as soon as possible. Safeguarding concerns arising in the UK should be reported to Designated Safeguarding Officer as soon as possible. . Your concern will be treated with respect and dealt with professionally. You can speak to the Safeguarding Field Focal Point/Designated Safeguarding Officer face-to-face or via email or telephone. If the Safeguarding Field Focal Point / Designated Safeguarding Officer is unavailable or your concern relates to the Designated Safeguarding Officer(s), you can report you concern to the Safeguarding Lead Director.

If you have witnessed an incident, you may be asked to document the details in a written report. A template will be provided to facilitate this, [in the form set out at Annex 4]. If you are not able to do this, we will help you. The Safeguarding Field Focal Point /Designated Safeguarding Officer or the Safeguarding Lead Director (as applicable) will make sure that all discussions and actions are documented. Contact details for Choose Love's Designated Safeguarding Officer and Safeguarding Lead Director can be found under Contact Us at section 1 of this policy.

Safeguarding concerns may arise from recognition of potential signs of abuse, suspicion of harmful behaviours, and direct disclosure by a survivor. Guidelines for responding to disclosures should be followed. (See Appendix 3).

The reporting of suspected or actual abuse is a professional and legal obligation. Failure to report information can lead to disciplinary action or dismissal. In any cases of suspicion of a safeguarding issue the person to whom it has been reported must immediately inform the Designated Safeguarding Officer.

We take all reports of safeguarding concerns seriously and will treat them confidentially. Choose Love aims to respond within 48 hours of the concern being filed. A report from a Partner should include the actions that are being taken to act on the concern raised. Allegations of inappropriate behaviour between Choose Love's staff will be managed through Choose Love's human resource management processes. Allegations of inappropriate behaviour between Partner Staff will be managed by the Partner. Support can be sought from Choose Love who will comment, and advise where necessary, on any steps being taken by the Partner. Should the concern be connected to an allegation of harm, abuse or exploitation by the manager or coordinator of one of our Partners, Choose Love, following consultation, can support the Partner's governing body to manage the investigation, such as by funding the services of an external investigator. Decisions about suspending funding will be made following a risk assessment of the partner organisation. If it is felt that the situation has not been dealt with in line with the severity of the incident, then Choose Love will advise on the next steps and, if appropriate, report to the relevant authorities and to its affiliated charity, Prism. We will aim to do this sensitively, in a non-judgemental manner and with the best interests of the people we support at the centre of decision-making processes.

The standardised flowchart on reporting safeguarding concerns provided above will be laminated and displayed at the Choose Love Head Office, and in all country offices. Our partners are expected to identify appropriate processes to communicate clear reporting pathways to all staff and volunteers and to ensure that feedback mechanisms are fully understood by the beneficiaries they support.

All staff are responsible for maintaining confidentiality of records and cases of allegations or suspicions. This information shall only be made available to the relevant parties. All staff and partners and beneficiaries shall receive additional support, guidance, and supervision during or following an incident or allegation. The full details of how to report a concern to us and what will happen next can be found here.

8.2. What to report

Choose Love has a responsibility to ensure that safeguarding incidents are handled sensitively and appropriately. Choose Love requires implementing partners to report serious incidents (including all safeguarding incidents) to us, in addition to their own coordinator/safeguarding focal point. After consultation, Choose Love will provide a mutually agreed form of support to assist partners who are developing their capacity. All serious incidents must be reported to Choose Love's Designated Safeguarding Officer using agreed reporting pathways and within agreed timeframes.

Below is a non-exhaustive list of examples of incidents that should be reported to Choose Love by its partner organisations:

- Allegations of criminal activity involving beneficiaries committed by staff or partner staff.
- A romantic or sexual relationship formed between a staff member or a partner staff member and a beneficiary/community volunteer where there is a power imbalance. (please refer to [Help Refugee Romantic and Sexual Relationships guidance](#).)
- A disclosure of sexual abuse or harassment between two staff members/partner staff Members or between a staff member/partner staff member and a Beneficiary.
- A safeguarding complaint made about the partner organisation by any other organisation or individual.

Choose Love works in a shrinking humanitarian space wherein many actions that provide support to refugees are criminalised. Examples include the distribution of food and non-food items to refugees and assisting with safe transport for people who wish to move on. The danger of its support work being criminalised will inform its risk strategy and its advocacy for the right to continue providing vital services, whilst ensuring the safety and well-being of the people that we work with.

Examples of incidents that Choose Love would **not** expect to be reported from partner organisations include:

- A security incident or evacuation at a distribution.
- A disclosure of abuse or harassment between beneficiaries.
- Internal conflict between volunteers/staff members within the organisation unless it is seriously affecting running of the operation.

8.3. Sanctions

Where partners do not demonstrate commitment to achieving safeguarding compliance and reluctance to report concerns, we will review the partnership for its suitability to continue. Wherever possible, agreement to achieve compliance will be discussed and agreed. However, if the partner remains high risk in relation to safeguarding, we will take steps to terminate the partnership. Such actions will only be taken after careful consideration of all relevant consequences by a team comprising the Field Manager, Head

of Programmes, the Designated Safeguarding Officer, and a member of the Executive Leadership Team.

The Designated Safeguarding Officer will present the results from the incident investigation and other relevant information, along with a recommendation for action. At least two of the four team members stated above must provide written confirmation of the action to be taken.

9. Media and Communications

As part of our duty of care to children and vulnerable adults, Choose Love will always put the child's or adult at risk needs first. We recognise our responsibility to the children or adults at risk who are portrayed in any of the images or communications used and will always strive to represent them positively and not as passive victims. We understand that all our beneficiaries must be represented as individuals with agency and identity.

Consent must be given by all contributors prior to the collection of images. Consent **must** be provided by the parent or guardian for children under the age of 18. Likewise, for an adult who lacks the capacity to provide informed consent, a family member must give consent on their behalf. There is no scenario where taking an image is more important than the safety and wellbeing of the person involved. The quality of consent obtained is essential. For instance, if a person is concerned about the impact of being photographed, then do not take their photo. Likewise, if there is a real or perceived imbalance of power between photographer and the person being photographed, gaining true consent may not be possible. Absolutely no payments or any other form of compensation are to be provided to any person being photographed in exchange for an image or to encourage consent.

We understand that in the age of the internet, images can be shared widely beyond their original intent of use. Consequently, we work hard to ensure that individuals who have their images taken in relation to our work have clear pathways for contacting us and that options to withdraw consent remain open, without a time limit. The names of children will always be changed to protect their identity. No images of children or adults at risk will be used which are degrading or sexually provocative or where children or adults at risk are partially clothed or naked. No photographs should be manipulated or taken out of context.

Choose Love will ensure that any image or recorded case study history of a child or adult at risk does not place them in a position of harm or render them vulnerable to any form of exploitation or abuse. In particular, it is vital we do not use their real name and other information that could lead to a child or adult at risk being identified or tracked.

All social media and case studies generated by Choose Love will be subject to the same safeguarding guidelines as outlined in this policy. Information about a child/children or adult at risk's life and any images of children or adults at risk will be kept confidential in

secure files. Access to images is limited to those that need them during the course of their work.

10. Implementation and Review

This Safeguarding Policy must be approved by the Choose Love's Directors and will be endorsed by the Trustees of Prism the Gift Fund. It will be translated into the mother tongue or main working language of each of Choose Love's field offices.

The Safeguarding Policy will be reviewed at least annually.

Appendix 1 - Safeguarding Framework - List of Policies

Standard 1 - Safeguarding	Standard 2 - People and Partnerships	Standard 3 - Risk Management	Standard 4 - Accountability
Safeguarding Policy	Safer Recruitment	Risk Management Policy	Safeguarding Accountability Policy
Whistleblowing Policy	Partner Selection and Due Diligence	Risk Matrix	
Code of Conduct	Community Engagement		

Appendix 2 - Categories of harm and safeguarding terminology

Children

Abuse of trust: a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. An abuse of trust can be committed by a member of staff or volunteer. It is vital that those in a position of trust clearly understand the power this gives them over those they care for and the responsibilities this carries. They must be given clear guidance to ensure they do not abuse their position or put themselves in a position where allegations of abuse, whether justified or unfounded, can be made. This is particularly important in the context of humanitarian aid when those in positions of power also control aid and resources.

Abuse linked to belief in ‘possession’ or ‘witchcraft’: abuse linked to the belief in ‘spirit possession’, ‘witchcraft’ or other spiritual beliefs can occur when communities or individuals believe that a child or an adult is in possession of evil spirits. In the case of child and adult abuse it generally occurs when either or both are being viewed as ‘different’; the child and adult could be disobedient, ill, or disabled. The accuser believes they need to “punish” the allegedly possessed child/adult or free/exorcise him or her of the spirit. Such beliefs can result in extremely cruel practices to vulnerable people, including severe beating, burning, starvation, isolation, cutting or stabbing. They can even cause the death of the child. Ritualistic ceremonies or other practices to hurt vulnerable children and adults can also be part of this harmful practice. The belief in “possession” and “witchcraft” is widespread. It is not confined to particular countries, cultures, or religions.

Child protection: Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Child criminal exploitation: Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Child safeguarding Incident: Refers to when an allegation is made, even if it is unsubstantiated, that a child is at risk of harm or has experienced harm

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 in exchange for something the victim needs or wants, and/or 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.

Contextual Safeguarding: As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. Such as: peer groups, wider community and online. These threats include exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation

County Lines: a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

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.

Extremism: 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.

Female Genital Mutilation: Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision, cutting, or sunna. Religious, social, or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It is dangerous and a criminal offence. FGM is illegal in the UK

Forced Marriage: One entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into marriage. Not to be confused with an arranged marriage.

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 provide adequate food, clothing and shelter (including exclusion from home or abandonment), protect a child from physical and emotional harm or danger, or to ensure adequate supervision (including the use of inadequate care-givers), or to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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.

Radicalisation: a process whereby someone has their vulnerabilities or susceptibilities exploited towards terrorism or crime - most often by a third party with their own agenda.

Safeguarding and promoting children's welfare: Defined for the purposes of this guidance as: a, protecting children from maltreatment b, preventing impairment of children's health or development c, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and d, taking action to enable all children to have the best outcomes

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.

Terrorism: is the use or threat of action, both in and outside of the UK, designed to influence any international government organisation or to intimidate the public. It must also be for the purpose of advancing a political, religious, racial, or ideological cause.

Young carer: A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).

Adults at risk

Discriminatory abuse including forms of harassment, slurs or similar treatment, verbal abuse because of race, gender and gender identity, age, disability, sexual orientation, religion, (protected characteristics under the Equality Act 2010).

Domestic abuse including psychological, physical, sexual, financial, emotional abuse, so called 'honour' based, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include: acts of assault, threats, humiliation and intimidation, harming, punishing, or frightening the person, isolating the person from sources of support, exploitation of resources or money, preventing the person from escaping abuse, regulating everyday behaviour.

Financial or material abuse including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, the misuse or misappropriation of property, possessions, or benefits.

Internet abuse and abusive images of vulnerable adults: an abusive image of vulnerable adults is defined as any representation without informed consent, by whatever means, of the vulnerable adult engaged in real or simulated explicit sexual activities or any representation of the sexual parts of the adult for sexual purposes. These images are then shared on social media without their consent. Technology has also meant that vulnerable are now subject to additional abuse and cyber-bullying through the internet and other forms of social media. Vulnerable adults may also be at risk of coming into contact with people who want to harm them through their use of the internet.

Modern slavery encompasses: slavery, debt bondage, human trafficking, forced labour and domestic servitude, traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, exploitation, servitude and inhumane treatment.

Neglect and acts of omission including ignoring medical emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, and heating

Organisational abuse: including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes, and practices within an organisation.

Physical abuse: Hitting, slapping, punching, hair-pulling, biting, pushing, kicking, scalding and burning, opening windows or removing blankets, physical punishments, inappropriate or unlawful use of restraint, involuntary isolation or confinement, misuse of medication (e.g. over-sedation), forcible feeding, rough handling, assault.

Psychological abuse including: emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, stopping religious and cultural expression, unreasonable and unjustified withdrawal of services or supportive networks.

Self-neglect: includes lack of self-care to an extent that it threatens personal health and safety, neglecting to care for one's personal hygiene, health or surroundings, inability to avoid self-harm, failure to seek help or access services to meet health and social care needs, inability or unwillingness to manage one's personal affairs

Sexual abuse including: rape, indecent exposure, sexual harassment inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual assault, sexual acts to which the adult has not consented or was pressured into consenting.

Appendix 3

Handling a disclosure - practical advice

If a person decides to make a disclosure concerning abuse, harm, or exploitation, this will likely have overcome many barriers before they chose to speak. They will have decided to disclose this information because they trust you and believe that you will act. They may simply wish to share the information so someone else is aware. Disclosures do not always happen to the designated safeguarding lead. They could happen to any volunteer or member of staff within an organisation so it is important that everyone in the organisation receives training on how to handle a disclosure; please feel free to share this document with everyone in your team.

- **Listen carefully to the person who is making the disclosure.** Avoid expressing your own views on the situation or asking any leading questions. Reacting with shock or disbelief could cause the person to stop talking, freeze or retract their statement.
- **Reassure the person they have done the right thing by speaking with you.**
- **Say you will take them seriously.** It takes a lot of effort to disclose information of this nature. They have told you because they want help and to be listened to.

- **Stay calm and open-minded about the information being disclosed.** Try not to write notes as the disclosure is happening, as this removes eye contact and approachable body language and may break up the flow of someone speaking.
- **Never promise confidentiality.** Clearly explain what you will do next and say that if the information that has been disclosed puts the individual or anyone else at risk, that you will need to pass this onto someone else who can support them and is responsible for these incidents. Never promise to keep it a secret.
- **Do not delay in reporting.** After speaking with the individual, write down a written report, with as many details as possible whilst it is fresh in your mind. Follow relevant reporting procedures.
- **Do not ask leading questions.** Allow the child/ adult who is speaking freely to do so, making prompts such as ‘Can you say some more about that?’ to seek clarity.
- **Do not stop the child/adult who is speaking freely**
- **Record the information as soon as possible.** Make sure you make an accurate recording of the disclosure as soon as possible, quoting words actually used by the person. Sign, date, and record the time of the disclosure and anyone else who was present.

Appendix 4 – Incident Report Form

Copies of our incident report forms can be easily accessed by emailing safeguarding@choose.love. An example template is below.

Reporters details

Date & time	
Your name*	
Your location	
Your organisation	

* If you would prefer to stay anonymous, you can leave this box empty.

Details of incident

Name of organisation(s) involved	
Date / time of incident	
Location of incident	

Details of incident	
Were / are there any [other] witnesses?*	
If yes, and the witness is happy to be contacted by Choose Love, please give their contact details.	
Are there any other factors you would like us to take into account?	

*We ask this question because witness testimony can help further investigation, however it is not required.

Preferred next steps

Would you feel comfortable for the safeguarding lead at Choose Love to contact you about this report in the future?*	
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* If the answer is yes, the Choose Love safeguarding lead will come back to you as quickly as possible. If you would prefer to communicate with a specific person at Choose Love who please feel able to let us know.

Thank you very much for the time you have taken to complete this report.