# Safeguarding Policy

| Policy | Date of approval by Choose Love's board of Trustees | Date of next policy review |
|---|---|---|
| Safeguarding Policy | May 2026 | May 2027 |
| Name and contact details for Safeguarding Lead | Dee Jethwa<br>safeguarding@choose.love | |
| Name and contact details of the trustee with safeguarding responsibilities | Geoffrey Cordell<br>geoffrey@choose.love | |

## 1. Introduction

Choose Love a registered charity, (number 1177927), and Choose Love Inc, USA, a 501(c)(3) charitable non-profit organisation, (herein referred to as Choose Love) is a pioneering new movement providing humanitarian aid to refugees and displaced people. Choose Love does whatever it takes to provide refugees and displaced people around the world with everything from lifesaving search and rescue boats to food and legal advice. We identify the need and raise funds to close and prevent gaps in services and protections for refugees and displaced people requiring humanitarian support due to conflict, persecution and natural disasters. We elevate the voices and visibility of refugees and galvanise public support for agile community organisations providing vital support to refugees along migration routes globally. We are powered by our vision of a world that chooses love and justice every day for everyone.

The aim of our safeguarding framework is to promote the development of a safeguarding culture that prioritises the safety and well-being of our end service recipients and everyone associated with us through our work as well as provide contextualised working guidelines for our partner projects and for our staff and volunteers to ensure that clear guidance to safeguard those who come into contact with us through our work is in place.

Throughout this policy, "Choose Love" refers to Choose Love, our UK based charity and Choose Love Inc USA.

## 2. Purpose

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 trustees, directors, employees, freelancers, interns and consultants, all volunteers, and the staff and volunteers of our partners supported through both our entities.
- The design and implementation of Choose Love's funded projects and activities, through its UK and USA entities.

Choose Love has a Safeguarding Framework comprising four standards: Safeguarding Policy, Partner Due Diligence and Grant Making, Risk Management and Accountability. This Safeguarding Policy contributes to the first of these four standards together with Choose Love's People Policy, Code of Conduct and Whistle Blowing Policy. Each of the four standards has policies within them, which, together, create a comprehensive safeguarding framework. Choose Love's policies are uploaded on its website and may be seen here. The definitions used in the policy are shown in **Attachment 1.**

Choose Love's safeguarding framework is designed to provide a strong foundation from which the organisation can manage its safeguarding responsibilities.

## 3. Choose Love's approach to Safeguarding

Choose Love recognises the risk that poor safeguarding practices pose to the organisation, its staff and the partners it entrusts with funds donated by the public and institutions. The safety of the people employed by us and our partners and the communities we support is paramount in all we do. We are committed to the highest possible safeguarding standards, and it is our expectation that our staff and partners share this commitment and apply the same robust 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.

However, Choose Love also recognises that many of the people we work with, although deemed vulnerable because of their circumstances, also have personal agency and resilience. Therefore, Choose Love's approach to safeguarding its partners', service recipients and their wider communities is not only focused 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.
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. We acknowledge this and seek to facilitate support for safeguarding challenges faced by grassroots and civil society organisations we fund.

All serious incidents reported through our USA and UK entities, will be reported to the Charity Commission, our regulatory body in the UK. Choose Love independently reports all serious incidents to its major donors.

**4. 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'[1]

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

## 5. Contact Us

To contact Choose Love regarding any of the information in this document or to make a safeguarding incident report, please contact Choose Love's Safeguarding Lead, here: safeguarding@choose.love

[1] How to report a serious incident in your charity - GOV.UK (www.gov.uk)

If the Safeguarding Lead is unavailable or your concern relates to the Safeguarding Lead, you can report your concern to the Safeguarding Lead Trustee, Geoff Cordell, via e-mail at geoffrey@choose.love

## 6. Choose Love's Policy Statement

Choose Love believes that everyone we come into contact with, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation, gender, gender identity, national origin, immigration/citizenship status has the right to be protected from all forms of harm, abuse, neglect, and exploitation. Notwithstanding these categories of vulnerability, Choose Love also recognises that displaced people, although not without agency, may suffer discrimination and stigma associated with a racist narrative that views them as unwelcome or illegal arrivals. Choose Love will not tolerate abuse and exploitation of anyone by staff or associated personnel.

Choose Love's Safeguarding Policy puts the protection of the communities we support and the people that deliver services through our partners and the people that work with us at the centre of all we do. Choose Love works to the Charity Commission definition of safeguarding. In its guidance, the Charity Commission defines ***"safeguarding as the range of measures to protect people in a charity, or those it comes into contact with, from abuse and maltreatment of any kind. This includes the Charity's beneficiaries, staff, volunteers and those who come into contact with the charity"***[2]

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 adults at risk, and children, from that harm; and to respond appropriately when harm does occur.

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

- Choose Love, a registered charity, takes its safeguarding obligations in relation to our operations in the UK and abroad seriously, and will take all reasonable steps to prevent harm.
- Choose Love selects our partners via a robust due diligence process and supports their delivery of projects in the field through financial support and technical support where the partner requires it, and Choose Love is able to offer it.
- Choose Love does not provide direct services to its end service recipients (displaced people). We fund service delivery partners. Therefore, we do not work directly with children or at-risk adults, vulnerable adults or with service recipients, except in a limited range of circumstances where Choose Love may provide staff to provide capacity building to partners in the field, during monitoring visits or organising events at the Choose Love Shop.

Choose Love commits to having robust, accountable, and transparent systems for prevention, protection, reporting, response and learning when safeguarding risks materialise. Those systems include a duty to all actors to report incidents, allegations, and concerns, and to adopt a survivor centred approach[3] with the alleged victim and a duty of care to the alleged perpetrator.
Consequently, Choose Love will:

[2] S | NCVO

[3] https://www.endvawnow.org/en/articles/1499-survivor-centred-approach.html



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- Take reasonable steps to safeguard and protect all service recipients from abuse, even when these are not children and adults at risk.
- Take reasonable steps to protect service recipients, 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 where 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 service recipients or any professional from another organisation. Reports can be made through safeguarding@choose.love

## 7. The scope of this policy

Choose Love's Safeguarding Policy applies to all trustees, directors, employees, freelancers, interns and consultants, work experience students and all volunteers within the UK and abroad.

A requirement of our due diligence process is that our implementing partners have appropriate safeguarding measures in place in their organisations, and we expect partners to notify us through our reporting mechanism, safeguarding@choose.love if a safeguarding incident occurs.

## 8. Our work

In a dynamic global political context, the situations in which Choose Love and our partners work are often unstable. As humanitarian work with displaced people[4] 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 service recipients 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 the work that we support.

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

[4] Including asylum seekers, displaced people, and refugees

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 displaced people. To save and rebuild lives, we work to fund and strengthen the capacity of partners on the ground.

## 9. 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 international context and the UK, including the Children Act 1989 and 2004 and Safeguarding Vulnerable Groups Act 2006, Care Act 2014 in England, and Charity Commission guidance. The management of Safeguarding Concerns reported from our USA operations will reflect relevant contextual laws and regulations for the protection of staff, children and vulnerable adults.

## 10. 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 Policy.

Choose Love is fully committed to applying safer recruitment principles, for the selection and vetting of potential new staff. Our recruitment practice reflects legal requirements in the UK and USA and best practice to reduce the risk of unsuitable people entering the organisation.

If Choose Love does ever engage in activities that require the presence of its staff or other representatives on the ground, they will be required to undertake an enhanced DBS or other background check in accordance with relevant contextual legislation. We will ensure that these are carried out as part of our commitment to safer recruitment and safeguarding.

No member of staff or other representative can 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 adults at risk we will comply with the legislation and relevant guidance in respect of referring that representative to the relevant authorities if appropriate[5].

Recruitment of trustees and board directors will be undertaken in accordance with applicable guidance from relevant local regulators in the USA and UK. In England and Wales, this includes guidance of Charity Commission for England and Wales[6] in order to ensure best practice in respect of trustee recruitment.

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[5] 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

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

The protection from harm of our personnel and management of reports relating to Choose Love staff and volunteers is addressed through HR policies.

Choose Love is a member of the Misconduct and Disclosure Scheme[7] and Funders Safeguarding Collaborative[8].

## 11. Code of Conduct

Choose Love's Code of Conduct describes the ethics and behaviour required of all stakeholders to ensure a robust safeguarding environment. It is designed to create a culture of best practice in keeping service recipients 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 required 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.

## 12. Partner Due Diligence and Grant Making

Choose Love funds projects in many countries. 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 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 17.1 of this policy.

In the first instance, Choose Love will follow a thorough due diligence process for partner selection, as set out in our Partner Due Diligence and Grant Making Policy. As well as our usual checks, our Risk and Assurance Director will oversee stringent internal checks, reflecting Government and Charity Commission Guidance for partner selection. The process will cover Financial, Governance, Management and Safeguarding due diligence. Our Risk and Assurance Director and Safeguarding Lead will provide support to the programme's team where high levels of risks have been identified.

## 13. 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 should ensure

[7] (The Misconduct Disclosure Scheme (misconduct-disclosure-scheme.org)

[8] Funder Safeguarding Collaborative | Global Fund for Children

that service recipients are aware of safeguarding incident reporting mechanisms and demonstrate arrangements for working together with INGO protection coordination and accountability systems when they are present, along with other relevant authorities. Choose Love aims to work closely with partners to establish how these could be strengthened for sustaining safeguarding policies and practices.

## 14. Summary of Partner Due Diligence and Grant Making Policy

Our Partner Due Diligence and Grant Making policy provides full details of our partner selection process. We work with a 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.

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's capacity 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.

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:

- Using the templates shared by Choose Love to develop an interim Safeguarding Policy and Code of Conduct until an appropriate policy is developed to reflect the context and the work of the partner organisation.
- Placing additional conditions on the funding awarded to such a partner.
- Allocating financial support to the partner to strengthen their own safeguarding practices.
- Providing additional safeguarding advice and support to the Partner via our Safeguarding Lead, sharing resources and, where necessary, arranging external capacity building support, and
- Conducting a risk assessment and developing a risk mitigation strategy in consultation with our Risk and Assurance Director whilst capacity building needs are being assessed and resourced.

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 recipients. All monitoring visits and follow up calls 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 service recipients and, if applicable, their representative groups. Our Partner Due Diligence and Grant Making Policy is available on request.



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## 15. Risk Management

Choose Love works in a shrinking humanitarian space wherein many actions that provide support to displaced people are criminalised. Examples include the distribution of food and non-food items to displaced people and assisting with safe and legal transport of people who wish to move. 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.

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 its Risk Matrix along with the controls implemented by Choose Love to mitigate these risks. Staff should refer to the Risk Matrix in which Safeguarding risks are integrated, and mitigation measures are identified.

## 16. 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 reflecting legal frameworks for Choose Love USA and UK, 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.

## 17. Reporting and responding to concerns

### 17.1. Choose Love's procedure for handling safeguarding concerns.

The chart below illustrates the reporting line from all our partners through to Choose Love's, Safeguarding Lead, Board of Trustees to responsibility to report to the Charity Commission.

Accountable to the Charity Commission
Choose Love Board of Trustees (UK)/Choose Love Board of Directors (USA)
Choose Love UK Trustee Board Safeguarding Lead
Choose Love's Executive Leadership Team
Choose Love Risk and Assurance Director
Choose Love's safeguarding lead
Partner's Governing Body
Partner Senior Management Team
Partner safeguarding focal point/coordinator

Choose Love's board of non-executive directors for USA and trustee board for UK is respectively responsible for ensuring that Choose Love's donors are informed of safeguarding concerns. Following approval to report to a donor, this responsibility is delegated to Choose Love's development manager. Whilst it is the responsibility of the safeguarding lead trustee for Choose Love's UK board to report

serious incidents to the Charity Commission, this task is delegated to the Director of Risk and Assurance and the Safeguarding Lead.

### 17.2. Making a report

No concern is too small. If you are unsure whether a situation constitutes a safeguarding concern you must contact the Safeguarding Lead via safeguarding@choose.love as soon as possible. Your concern will be treated with respect and dealt with professionally. You can speak to the Safeguarding Lead via the above email. If the Safeguarding Lead is unavailable or your concern relates to the Safeguarding Lead, you can report you concern to the Safeguarding Lead trustee via geoffrey@choose.love

If you have witnessed an incident, you may be asked to document the details in a written report. A template is provided to facilitate this and is available to download from our website. If you are not able to do this, we will help you. The Safeguarding Lead or the Safeguarding Lead trustee (as applicable) will make sure that all discussions and actions are documented. Contact details for Choose Love's Safeguarding Lead and Safeguarding Lead trustee can be found under Contact Us at section 5 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. Please see **Attachment 2** for more details.

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 case of suspicion of a safeguarding issue, the person to whom it has been reported must immediately inform the Safeguarding Lead at Choose Love.

We take all reports of safeguarding concerns seriously and will treat them confidentially. Choose Love aims to respond by acknowledging 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 and by Choose Love's staff will be managed through Choose Love's human resource management and safeguarding processes. Allegations of inappropriate behaviour between partner staff and by 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 the Charity Commission. 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 service recipients , staff, and volunteers translated where necessary, and to ensure that complaint and feedback mechanisms are fully understood by the service recipients 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 service recipients shall receive additional support, guidance, and supervision during or following an incident or allegation. If you have any questions on how we manage safeguarding at Choose Love or have any current concerns personally or on behalf of someone else, do reach out at safeguarding@choose.love. Any correspondence will be treated as confidential.

### 17.3. 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 Safeguarding Lead using agreed reporting pathways and within agreed timeframes. Choose Love's Programmes team will facilitate partners who may need support to report a safeguarding incident.

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 service recipients committed by Choose Love trustee, directors, employees, freelancers, interns and consultants, all volunteers anyone associated with us through our work or partner staff.
- A romantic or sexual relationship formed between a Choose Love trustee, directors, employees, freelancers, interns and consultants, all volunteers, anyone associated with us through our work or a partner staff member and a beneficiary/community volunteer where there is a power imbalance.
- A disclosure of sexual abuse or harassment between two staff members/partner staff members or between a staff member/volunteer, staff member/partner staff member and a beneficiary.
- A safeguarding complaint made about the partner organisation by any other organisation or individual.
- An unsafe culture in the organisation because of bullying, harassment, discrimination.
- Internal conflict between volunteers/staff members within the organisation impacting operations.

### 17.4. 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, Choose Love may take steps to terminate the partnership.


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A review will be led by the Director of Programmes, working closely with the Safeguarding Lead, Risk and Assurance team and recommendations made to the ELT and the Safeguarding Lead Trustee.

## 18. Media and Communications

As part of our duty of care to children and adults at risk, 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 service recipients 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 is 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 as well as Choose Love's Social Media 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.

## 19. Implementation and Review

Choose Love is committed to embedding a strong safeguarding culture through capacity building. **This** requires the implementation of 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



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commitments made. We make the following key commitments:

- Staff will receive a thorough induction within the first week of their start date covering all aspects of our safeguarding policies and implementation plan, and they will be introduced to the Safeguarding Lead.
- Our Trustees for Choose Love CIO and Board of Directors for Choose Love Inc will receive training on the safeguarding role and responsibilities of governing bodies.
- All trustees, directors, staff, volunteers 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 Safeguarding Lead in collaboration with the Executive Leadership Team and will be approved by the Choose Love Trustee Board in the UK and Board of Directors in the USA.

This Safeguarding Policy must be approved by the Choose Love's Directors (USA) and Board of trustees (UK). The Safeguarding Policy will be reviewed at least annually.

**Choose Love**
**May 2026**

**Attachment 1: 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.

**Adult at risk** - Any person aged 18 or over who is or may need 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.

**Displaced person**

A person expelled, deported, or impelled to flee from his or her country of nationality or habitual residence by the forces or consequences of war or oppression

**Internally displaced person**

An internally displaced person is someone who is forced to leave their home but who remains within their country's borders. They are often referred to as refugees, although they do not fall within the legal definitions of a refugee.

**Partner:** an organisation which receives funding from Choose Love or one with which Choose Love 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), and volunteers, interns and secondees of a partner.

**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.



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**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.

**Service Recipient -** 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.*"

**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.[9]

**Vulnerable Adult** - Vulnerable adults are defined as people who are unable to take care of protecting themselves against harm or exploitation for any reason. When safeguarding adults, this involves reducing and preventing the risk of harm, neglect, or abuse alongside supporting them to maintain their own lives. While most would consider vulnerable adults to be those who lack capacity, adults with full capacity can also be considered as vulnerable as well. This is when they are unable to take care or protect themselves from harm[10].

[9] https://www.unhcr.org/3d4f91cf4.pdf

[10] https://www.carecheck.co.uk/importance-of-safeguarding/)

A list of categories of abuse for children can be accessed here and adults at risk here. These can be referred to when assessing allegations of harm.

**Attachment 2: Handling a disclosure - practical advice**

If a person decides to make a disclosure concerning abuse, harm, or exploitation, they 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.