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SECTION 2: DEFINITIONS

Vulnerable adult *(international terminology)*: an adult who is experiencing, or is at risk of, abuse, neglect or exploitation because of being in a position of social disadvantage due to one or more factors. The result is individual, and sometimes collective, vulnerability due to differences in power. These factors include (but are not limited to) poverty, migrant status, sex, gender identity, sexual orientation, disability, mental health, caste, religion, health, and age *(based on World Health Organisation definition of vulnerable groups)* *(for a detailed list of factors, see Section 4.1)*.

Adult at risk of abuse or neglect *(UK terminology)*: an adult who has care and support needs is experiencing, or is at risk of abuse or neglect; and because of these care and support needs cannot protect themselves against actual or potential abuse or neglect *(Care Act 2014, UK definition)*.

FOR THE PURPOSE OF THIS POLICY, THE TERM ‘VULNERABLE ADULT’ IS USED THROUGHOUT, REFERRING TO BOTH THESE DEFINITIONS.

Safeguarding vulnerable adults: the responsibility of organisations to make sure their staff, volunteers and others associated with them, as well as operations and programmes, do no harm to vulnerable adults, or expose them to abuse or exploitation. Responding to concerns and disclosures about or from an adult in line with national legislation and organisational policy, prioritising the well-being of vulnerable adults at all times. Current good practice guidelines direct organisations to consider how to safeguard everyone in the organisation at all times, including protecting staff from inappropriate behaviour such as bullying and harassment. *(based on Bond definition of Safeguarding)*.

Abuse of a vulnerable adult: Abuse and harm are closely related concepts. Abuse is harm which is so severe or persistent that it is deemed “significant” and is likely to have a lasting effect on the person’s health or development. This policy addresses all forms of harm, including harm which may be caused intentionally or unintentionally, and which may not reach the threshold of significant harm or the legal threshold to take action. Examples of abuse include: physical; sexual; psychological; financial; discriminatory; organisational and/or domestic abuse; exploitation; neglect; radicalisation; hate and mate crime; female genital mutilation; modern slavery; human trafficking; restraint; abuse as a result of membership of, or affiliation with, a stigmatised group (such as caste, religion, migrant, HIV status); and/or as a result of poverty.

Representatives of Anti-Slavery International: all board members, staff, volunteers, interns, consultants and others who visit programmes or have contact with people (both direct or indirect) in the name of Anti-Slavery International.

Direct contact with vulnerable adults: being in the physical presence of a vulnerable adult, whether the contact is occasional or regular, short or long term.

Indirect contact with vulnerable adults: having access to information on vulnerable adults in the context of the organisation’s work, such as their names, locations (addresses of individuals or projects), photographs and/or case studies.

Mental capacity: outlined in the Mental Capacity Act *(2005, UK - see Section 4.3)*. The Act is designed to protect and empower adults who may lack the mental capacity to make their own decisions about their care and treatment and provide guidance for those who work with them to enable them to make decisions in the best interests of the vulnerable adult.

Partner organisations are expected to have their own Safeguarding policies that outline a definition of ‘vulnerable adult’ that reflects their own national legislation [see Appendix C].

See Appendix A for full definitions.

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1 a form of disability hate crime in which a vulnerable person is manipulated or abused by someone they believed to be their friend
SECTION 3: SCOPE OF THE POLICY

This policy outlines the primary responsibility of Representatives of Anti-Slavery International:

**Irrespective of the location in which concerns arise, or who is involved, all Representatives of Anti-Slavery International are obligated to report any safeguarding concerns or disclosures to the Head of Programmes immediately.**

This policy applies to all board members, staff, volunteers, interns, consultants and others who visit programmes and/or have contact with adults (both direct or indirect) in the name of Anti-Slavery International. For the purpose of this policy, the above-named individuals are referred to as ‘Representatives’ of Anti-Slavery International.

It does NOT apply to organisations that Anti-Slavery funds, supports and/or otherwise aligns with. Whilst we proactively support our partner organisations to effectively safeguard vulnerable adults and have specific safeguarding requirements embedded in our partnership Agreements with all partners, Anti-Slavery International is not directly responsible for safeguarding and protecting vulnerable adults who are supported by our partners, unless we are aware of a safeguarding concern or disclosure. (*For more information, see Section 7: Reporting and response procedures*).

All Representatives of Anti-Slavery International have a responsibility to uphold the safety and well-being of the adults that the organisation comes into contact with (both physically and remotely) and to implement the policies and procedures contained within this document. All Representatives are required to read the Safeguarding Policy and sign our Statement of Commitment to adhere to the principles and procedures it contains (*Appendix F: Statement of Commitment*). Failure to comply with this policy could result in the immediate termination of contractual or other agreements with Anti-Slavery International.

This policy outlines Anti-Slavery International’s responsibility to uphold the safety and well-being of its Representatives who define themselves as ‘vulnerable adults’.

SECTION 4: POLICY STATEMENT

Anti-Slavery International is committed to eradicating all forms of slavery throughout the world including forced and bonded labour, human trafficking, descent-based slavery and the worst forms of child labour. We do this by (1) leading advocacy in the UK and internationally and (2) working in partnership with local organisations because we believe they are best placed to address slavery in their own countries.

Anti-Slavery International prioritises the safeguarding of all vulnerable adults who come into direct contact with us. Our safeguarding policies, procedures, training and support also promote safe and inclusive environments for all our Representatives.

This policy recognises that most Anti-Slavery International Representatives are based in the UK and fall under the jurisdiction of UK legislation. When travelling to visit partners, Representatives also fall under the legislative jurisdiction of the country they are visiting. This policy outlines our response to safeguarding concerns and disclosures both in the UK and abroad.

Anti-Slavery International recognises that our partners operate in countries with different legislation and support services for both children and vulnerable adults; the majority run programmes that directly support those who are at risk of or affected by slavery because of their vulnerabilities. We set clear safeguarding requirements for our partners in our partnership Agreement to ensure they have robust policies and
practices that reflect local realities, prioritising the well-being of children and vulnerable adults who they come into contact with. We support our partners to develop and uphold these policies and practices (see Partnership Guidance and Partnership Agreement).

4.1 Vulnerability to abuse and exploitation

Some adults are more at risk of/vulnerable to abuse than others, often because of power imbalances. The factors involved in power imbalances may be inherent, such as age, or may be a consequence of the person’s situation, such as displacement due to a natural disaster. Power imbalances are particularly relevant to the work that we and our partners do. We recognise that power imbalances exist between Anti-Slavery International, partners and beneficiaries, and that power dynamics may change dependent on situations and decisions, such as funding.

Relevant vulnerability factors for consideration within the scope of Anti-Slavery International’s work include (but are not limited to):

- Physical and/or intellectual disability
- Mental health
- The impact of poverty and natural disasters, inc., housing, access to basic needs and services
- Age
- Race, caste and/or ethnic background
- Sex and/or gender identity
- Sexual orientation
- Religion or belief
- Health condition (such as HIV status)
- Socio-economic background
- Migrant status
- Others.

It is important to recognise how vulnerability factors can intersect and amplify a person’s vulnerability. For example, a migrant widow of a particular caste is likely to be more vulnerable than a married woman of the same age, caste and ability living in her home village.

We identify and minimise the safeguarding risks to vulnerable adults through risk assessments, training, and creating open environments which encourage people to report concerns. We recognise that an adult may be at risk of abuse in certain situations or times, but not others. We mandate that it is everyone's responsibility to recognise concerns and take reasonable and appropriate steps to safeguard everyone’s welfare.

Anti-Slavery International recognises that the abuse of vulnerable adults can take place anywhere, including in an office environment. We acknowledge that abuse can take place face-to-face or remotely, e.g. online, including social media; that it can be non-recent or current, short-term or long-term, punctual or recurrent and that perpetrators can be children or adults, including those in positions of trust. It is also important to acknowledge that people, including those who may vulnerable adults, can be perpetrators as well as victims.

All concerns about a vulnerable adult must be handled in line with our Vulnerable Adults Safeguarding reporting procedures (Section 7). All incidents of poor practice are taken extremely seriously and viewed as a breach of our safeguarding policies and procedures, appropriate and proportionate action will be taken accordingly.

4.2 Our commitment to safeguarding vulnerable adults

Anti-Slavery International commits to:
• Promoting and prioritising the safety and well-being of all vulnerable adults who come into contact with (both physically and remotely) Anti-Slavery International. We do this through the development, communication, implementation and upholding of clear, up-to-date safeguarding policies and procedures. These are mandatory for everyone involved with Anti-Slavery International.
• Enabling Representatives to understand their safeguarding roles and responsibilities and be provided with appropriate learning opportunities to recognise, identify and respond to safeguarding concerns and disclosures (see Section 9.1: Specialist topics - Safe recruitment and training)
• Providing additional guidance and support for staff, volunteers and consultants who have direct and/or indirect contact with vulnerable adults (see Section 9.2: Specialist topics - Visiting projects)
• Appointing and supporting a safely recruited, trained, resourced Designated Safeguarding Officer (DSO) and Nominated Trustee for Safeguarding who proactively promote the safeguarding of vulnerable adults and take appropriate action when concerns and disclosures are made (see Section 4: Accountability)
• Supporting partners to develop and uphold robust safeguarding policies and processes that reflect local realities and prioritise the well-being of all children and vulnerable adults who come into contact with them (see Appendix B, Partnership Guidelines and Partnership Agreement)
• Having safe recruitment procedures that include questions on safeguarding (for relevant roles); a criminal records check (for relevant roles) and two references that are seen and signed off by the DSO and Head of Finance and Resources before anyone commences their role in Anti-Slavery International (see Section 9.1: Specialist topics - Safe recruitment and training)
• Providing robust supervision and support for all Representatives that actively encourage everyone to recognise and discuss safeguarding risks and concerns (see Section 9.1: Specialist topics - Safe recruitment and training)
• Listening to vulnerable adults – providing opportunities for all adults to tell us what we are doing well, what risks there are to them and how we can help keep themselves and others safe (see Section 9.3: Specialist topics - Involving adults in advocacy)
• Inclusive communication, taking people’s needs into consideration, such as their ability to access information due to sex; caste; language; literacy skills; learning disabilities; hearing and visual impairments - face-to-face, online and on social media
• Accurately recording and safely storing confidential safeguarding information (see Section 9.4: Specialist topics - Communications guidelines)
• Risk assessing our policies and programmes to ensure they continue to recognise and support vulnerable adults both within the organisation and those who we come into contact with (see Appendix B: Checklist for reviewing safeguarding policies)
• Periodically reviewing our safeguarding policies, processes and guidance, particularly whenever there are changes in safeguarding legislation or our own programmes or procedures that this policy does not cover.

4.3 Assessing an adult’s capacity to make decisions that affect them

Five principles which underpin the Mental Capacity Act:
In order to protect those who lack capacity and to enable them to take part, as much as possible in decisions that affect them, the following principles apply:
1. You must always assume a person has capacity unless it is proved otherwise
2. You must take all practicable steps to enable people to make their own decisions
3. You must not assume incapacity simply because someone makes an unwise decision
4. Always act, or decide, for a person without capacity in their best interests
5. Carefully consider actions to ensure the least restrictive option is taken.

Assessment of capacity: 
Follow the two-stage test for capacity:
Stage 1: Does the person have an impairment of the mind or brain (temporary or permanent)?
If yes:
Stage 2: Is the person able to:
- Understand the decision they need to make and why they need to make it?
- Understand, retain, use and weigh information relevant to the decision?
- Understand the consequences of making, or not making, this decision?
- Communicate their decision by any means (i.e. speech, sign language)?

Failure on one point may determine lack of capacity.

How to act in someone’s best interests:
- Do not make assumptions about capacity based on age, appearance or medical condition
- Encourage the person to participate as fully as possible
- Consider whether the person will in the future have capacity in relation to the matter in question
- Consider the person’s past and present beliefs, values, wishes and feelings
- Take into account the views of others – i.e. carers, relatives, friends, advocates
- Consider the least restrictive options.

SECTION 5: ACCOUNTABILITY

5.1 Implementation and oversight
Implementing the procedures included within this policy requires commitment and oversight at every level of the organisation. Although safeguarding is the responsibility of all Representatives of Anti-Slavery International, specific responsibilities are designated to staff at different levels of the organisation to ensure that safeguarding measures are monitored regularly and that any new risks are identified and addressed promptly.

Anti-Slavery International has a Designated Safeguarding Officer (DSO) who is responsible for:
- Promoting awareness of the policy and processes throughout the organisation
- Monitoring implementation of the policy and reporting any issues or concerns to the Senior Management Team (SMT)
- Sharing knowledge and implementing the Prevent Duty which prevents vulnerable adults from being drawn into extremism and terrorist actions (see Appendix A – Glossary of Terms)
- Identifying training needs and developing, commissioning and/or delivering training where required
- Acting as a source of support and information for staff on safeguarding issues
- Working with the Head of Programmes (HoP), CEO and Safeguarding Advisor (where necessary) to determine as to whether a concern/disclosure should be reported to external safeguarding authorities, either in the UK or overseas
- Working with the Head of Programmes, CEO and Safeguarding Advisor (where necessary) alongside the Local Authority/police (either in the UK or overseas), to determine as to whether a concern/disclosure about a Representative should be reported to the Disclosure and Barring Service (UK only).

The Senior Management Team (SMT) at Anti-Slavery International supports the DSO in ensuring that all safeguarding measures are implemented and adhered to and participates in an annual review of the Safeguarding policies.

Specific responsibilities are assumed by the Head of Programmes who is responsible for:
• Receiving all concerns about the conduct of Anti-Slavery International Representatives that represent a breach of this policy; where there is a concern/disclosure of harm or abuse of a vulnerable adult, whether or not it may be criminal in nature and require notification to external agencies
• Receiving concerns about the practice of the DSO
• Maintaining clear records of any concerns that are reported and the actions taken to address these concerns
• Working with the DSO, CEO and Safeguarding Advisor (where necessary) to determine as to whether a concern/disclosure should be reported to external safeguarding authorities
• Working with the DSO, CEO and Safeguarding Advisor (where necessary) alongside the Local Authority/police, to determine as to whether a concern/disclosure about a Representative meets the requirements for being reported to the Disclosure and Barring Service.

In all issues relating to safeguarding, the Head of Programmes informs and consults with the CEO of Anti-Slavery International who is responsible for:
• Acting as a link between the operational team and the Board of Trustees on safeguarding concerns/disclosures
• Acting as the main point of contact for safeguarding concerns if the Head of Programmes is unavailable
• Receiving concerns about the practice of the Head of Programmes.

In accordance with the UK Charity Commission Guidelines\(^2\), the trustees of Anti-Slavery International maintain an oversight of safeguarding within the organisation to prioritise the safety and well-being of those who benefit from, or work with, the charity. The functions of the **Nominated Trustee for Safeguarding** include:
• Acting as a point of contact within the Board for the DSO, Head of Programmes and CEO
• Receiving and responding to any concerns which relate to the CEO
• Informing the Board of Trustees of any safeguarding concerns/investigations which may affect the reputation and standing of the organisation and providing advice on how these are to be managed
• Reporting any serious safeguarding incidents involving Anti-Slavery International representatives to the Charity Commission
• Commissioning the External Safeguarding Advisor to lead on safeguarding investigations about Anti-Slavery Representatives where this is not being conducted by other agencies and supporting those investigations.

In addition, Anti-Slavery International has access to an **External Safeguarding Advisor** whose key functions include:
• Providing impartial advice on safeguarding issues, concerns and disclosures
• Leading on investigations into safeguarding allegations by representatives of Anti-Slavery International where this is not being conducted by other agencies, supported by the Nominated Trustee for Safeguarding
• Where requested, supporting the DSO in the development and/or delivery of training
• Where requested, supporting Anti-Slavery International in the review of its Safeguarding policy.

All Representatives have the contact details for all above listed Safeguarding Roles (*see Section 1*).

5.2 Work with partners

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\(^2\) For further information, see the Charity Commission (2013) *Strategy for Dealing with Safeguarding Vulnerable Groups* including Children Issues in Charities
Anti-Slavery International works with and through national partner organisations in a number of countries. We recognise that effective safeguarding policies need to reflect the specific legal and cultural contexts in which our partners are working. All our partners are made aware of the provisions of the Anti-Slavery International Safeguarding policy and are mandated to uphold the principles of it which are outlined in the partnership Agreement. Anti-Slavery International places primary importance on working with partners that have safeguarding policies and processes in place and an open approach to developing and reviewing those processes in line with best practice. Safeguarding is a continual process that Anti-Slavery and our partners regularly monitor and review. We recognise that some partners may have strong safeguarding measures in place whilst others may require additional support to develop/review and implement robust policies and procedures.

To achieve this, Anti-Slavery International:

- Embeds safeguarding principles, expectations and requirements within the partnership Agreement
- Throughout all partnerships, Programme Managers review the safeguarding policies and procedures of partner organisations every two years, or where changes to their programmes or national legislation occur. These reviews provide a guide to Programme Managers and partners on how to continue supporting and strengthening safeguarding
- Includes a review of safeguarding within their due diligence process prior to developing formal partnerships with any organisation
- Provides Anti-Slavery International’s Safeguarding policies in a language accessible by their staff (generally French or English)
- Includes safeguarding within monitoring visits and engages in discussions with partners regarding any identified concerns/disclosures or areas in which they would like support
- Includes safeguarding support and training within project budgets where possible so that local specialists can be identified to develop the knowledge and skills of local teams
- Seeks additional funding through some funding mechanisms for partners to develop their safeguarding policies on a case-by-case basis.

All partners:

- Read Anti-Slavery International’s Safeguarding policies and agree to uphold the safeguarding principles outlined in the Partnership Agreement
- Commit to prioritising safeguarding and developing their policies and procedures in line with good practice. Where a partner does not have a safeguarding policy, they must first develop an Adult Safeguarding Statement with a view to developing a more comprehensive policy within a period of time agreed by Anti-Slavery International and the partner (see Safeguarding Adults at Risk Safeguarding Statement and Appendix B: Checklist for Reviewing Protection & Safeguarding Policies)
- Prospective new partners provide a copy of their own Safeguarding policies prior to signing the partnership Agreement. Where a prospective partner does not have a safeguarding policy, they must have, as a minimum, an Adult Safeguarding Statement prior to partnership being agreed (see Safeguarding Adults at Risk Safeguarding Statement and Appendix B: Checklist for Reviewing Protection & Safeguarding Policies).

Where Anti-Slavery International facilitates coalitions of other organisations for advocacy purposes (such as the Anti-Trafficking Monitoring Group), members are required to have their own safeguarding policies in place. In some circumstances, Anti-Slavery International funds coalitions of small grassroots organisations (such as the Tanzania Domestic Workers Coalition); in these circumstances Anti-Slavery International supports the coalition to develop and uphold safeguarding policies (on a case-by-case basis) as and when funding permits.
Where membership of a coalition results in a funding agreement between Anti-Slavery International and a member organisation, the member is considered a national partner and the requirements and support for partners described above applied.

5.3 Breaches of this policy and/or safeguarding procedures

Any breaches of this policy are taken extremely seriously and are managed in line with the Anti-Slavery International’s Grievance and Disciplinary Policies. Actions may include, but are not limited to:

- Staff – disciplinary action and/or dismissal
- Trustees – termination of Board membership, reporting to Charity Commission
- Volunteers and interns – termination of the relationship with Anti-Slavery International
- Consultants, trainers or sub-contractors – termination of contract
- National partners – withdrawal of funding/support and/or ending of relationship with Anti-Slavery International
- ALL: LEGAL ACTION.

SECTION 6: CODE OF CONDUCT

This Code of Conduct is designed to enable all representatives of Anti-Slavery International to behave in a manner that is appropriate and protects children and vulnerable adults. It is to be interpreted in the spirit of common sense, with the best interests of children and vulnerable adults as the primary consideration.

All Representatives of Anti-Slavery International are responsible for adhering to this Code of Conduct at all times. Concerns or breaches should be reported to the DSO. Any failure to report such breaches could result in disciplinary action.

General professional conduct

- Always act with integrity. Be polite, considerate and provide an example of good conduct that helps to create a safe, inclusive environment for everyone
- Never use language that is discriminatory on the grounds of race, culture, age, gender, disability, religion, sexuality or otherwise
- Never engage in any activity that could bring the organisation into disrepute
- Challenge unacceptable behaviour and report any concerns immediately
- Remember that someone else may misinterpret your actions, no matter how well-intentioned. Never believe “It could never happen to me”
- Always prioritise the well-being of all children and vulnerable adults. Do not abuse, neglect, discriminate against or otherwise harm anyone or act in a way that may be interpreted as such
- Talk to us: if you are worried about someone or something you have seen or heard, follow the relevant reporting process in the Safeguarding policies
- Familiarise yourself with our safeguarding policies and procedures: you have a responsibility to uphold them at all times.

Use of social media

Anti-Slavery International’s social media accounts

- Always obtain informed consent before taking or publishing any photos, videos or personal information (for more information, see Section 4.3).

Personal social media accounts
• Keep your personal and professional life separate, including on social media. In your role as a Representative never befriend a project participant on your personal social media platforms
• Never directly post images or stories about people who are supported by Anti-Slavery International on your personal social media accounts. Consent is given to Anti-Slavery International as an organisation and not to the individual for personal use
• Where a partner organisation has posted images or stories about beneficiaries that make them identifiable and may put them at risk, discuss this with the partner organisation as soon as possible and agree a way forward that prioritises the safety of children and vulnerable adults
• If you wish to promote the work of Anti-Slavery International, representatives are encouraged to share information that has been posted on Anti-Slavery International’s website or social media platforms by sharing/re-tweeting information on their personal social media accounts
• Always think twice about what you post/share and what implications this may have for Anti-Slavery International
• Never upload or post any racist, defamatory, obscene, or abusive content
• Always inform the DSO if you observe or read content from Anti-Slavery International Representatives which breaches this code.

If you have direct contact with children or vulnerable adults, see Section 9.2: Visiting projects and direct contact with vulnerable adults.

SECTION 7: REPORTING AND RESPONSE PROCEDURES

Anti-Slavery International works through partner organisations; effective response and reaction protocols depend on the collaboration and shared understanding between Anti-Slavery International and our partners. For this reason, it is important that representatives of Anti-Slavery International are aware of local procedures so that action can be taken promptly.

Irrespective of the location in which the concerns arise, or who is involved, Representatives of Anti-Slavery International are obligated to report any concerns about alleged or suspected harm to the Head of Programmes immediately.

In the event that the concerns relate to the Head of Programmes, the report must be made to the CEO. Concerns about the CEO must be made to the Nominated Trustee for Safeguarding and Chair of the Board. Concerns about the Chair of the Board must be made to the CEO and External Safeguarding Advisor.

All concerns should be reported within 24 hours, allowing for time differences in different countries. Failure to report any observations / reports you have received, however uncertain, could result in disciplinary action. All concerns should be recorded using the safeguarding reporting forms (Appendix E: Cause for Concern Form)

Anti-Slavery International operates on the principle that data protection legislation does not prohibit the reporting of concerns and/or disclosures about the protection of vulnerable adults unless the concern/disclosure takes place outside of the UK and does not involve a British Citizen or resident (victim or perpetrator), in which case, the data protection legislation of the country where the concern/disclosure originated from is adhered to. In the UK, data protection legislation does not prohibit the reporting of concerns and/or disclosures where (1) the adult has given permission for the concern/disclosure to be shared, and/or (2) where the adult is deemed not to have the mental capacity to decide on next steps themselves (see Section 4.3), and/or (3) someone else is at risk of harm. If the adult does not give permission to share the concern, see point 2 in procedures A, B and C below.

In addressing the concern, representatives of Anti-Slavery International adhere to the following principles:
• **The best interest of the vulnerable adult** – where any concern is raised, prioritising the safety and well-being of the vulnerable adult must be the primary consideration

• **Equal right to protection** – every person has equal right to protection, irrespective of age, religion, caste, sex or any other factor

• **Organisational responsibility** – all Representatives are required to uphold this policy. The responsibility for decisions and actions rests with Anti-Slavery International as an organisation and not with any individual staff member who adheres to, or has responsibilities described within this policy

• **Confidentiality** – details of the concern should be shared with the minimum number of people necessary in order to protect the safety of the vulnerable adult. Records of protection concerns are kept securely, and access limited to the Nominated Trustee for Safeguarding, CEO, Head of Programmes and (where relevant) the DSO. Access by other individuals requires permission from the Head of Programmes

• **Respect for local laws and customs** – Anti-Slavery International works in diverse contexts. Concerns and disclosures must be responded to and investigated in the context of local laws and customs unless the alleged crime meets the Interpol threshold for investigation by the individual’s country of citizenship

• **Defensible decision making** – Representatives are expected to uphold this policy at all times and seek advice from the DSO in order that they may make defensible decisions that are appropriate and safeguard the welfare of the vulnerable adult.

**Disclosures from vulnerable adults**

People experience multiple barriers to disclosing abuse. Many fear that they will not be believed or are concerned about the consequences that may follow from speaking out about abuse. If someone feels able to speak to you about their experiences, it is essential this is handled sensitively and professionally. The following guidelines should be followed:

• Accept what the person says and re-assure them that you take what they are saying seriously. Never minimise their concerns

• Reassure the person that they have done the right thing by telling you

• Listen carefully and calmly to them. Let the person speak freely but do not press for information

• Be aware of the potential for misunderstandings, particularly when people speak different languages or may use terms in different ways. Caution should be exercised when speaking with people through a translator and consideration taken of the various ways that this can influence the information received

• If you need to clarify your understanding, ask open questions and be careful to not influence what they are saying by asking leading questions. Questioning can prevent the person from continuing to speak and leading questions can prevent a case from being considered in court. Questioning (beyond necessary clarifications) should only be done by trained professionals (HoP, social workers, police)

• Ask the person what would help them feel safe. Include this within any later discussions where you and/or the HoP work with the adult to agree protective actions

• Let the person know what you are going to do next and that you will keep them informed of what happens

• Do not take notes when the adult is speaking so that you can show you’re really listening to them but do make written notes as soon as you can afterwards, recording what was said verbatim where possible

• Do not permit personal doubt to prevent you from reporting the allegation

• Ask their permission to share the concern/disclosure with the HoP
• Do NOT promise to keep what they have told you secret – you may decide you need to share the information because the adult is not capable of making the decision themselves, someone else is at risk of harm, or local legislation requires you to do so.
• Inform yourself about local legislation as this may determine actions such as who you are permitted to share information with.
• Recognise that there may be inherent difficulties in interpreting what is said by someone who has a speech disability and/or differences in language.
• If a third party is at risk of harm, explain that you must report the disclosure, even if they don’t want you to.
• Follow the Cause for Concern about a vulnerable adult Procedures (A to D).
• Record all information using the Cause for Concern about a vulnerable adult form (Appendix E).
• Talk to any of the responsible individuals listed in this policy if you are personally affected by the concern/disclosure.

The procedures to follow in the case of a concern are:

Safeguarding Adults outside the UK
Procedure A: Alleged harm caused, or likely to be caused to a vulnerable adult by a Representative of Anti-Slavery International whilst overseas
Procedure B: Alleged harm caused, or likely to be caused to a vulnerable adult by a partner
Procedure C – Alleged harm caused, or likely to be caused to a vulnerable adult occurring within the community and perpetrated by individuals not associated with either Anti-Slavery International or partner organisations

Safeguarding Adults in the UK
Procedure D: Alleged harm caused, or likely to be caused to a vulnerable adult by a Representative of Anti-Slavery International whilst in the UK

Safeguarding adults outside the UK

This includes:
1. All staff, volunteers and consultants employed (paid and unpaid) by Anti-Slavery International who are living in/visiting any country outside of the UK and/or working outside of the UK for Anti-Slavery International
2. All individuals and groups who Anti-Slavery comes into direct contact outside the UK, including those we come into contact with through our partner organisations, including face-to-face, via email, phone or online, including vulnerable adults who contact us directly; and vulnerable adults who partner organisations discuss with us. Note – where there is a concern/disclosure about a vulnerable adult occurring within the community and perpetrated by individuals not associated with either Anti-Slavery International or partner organisations – see Procedure D.

If a concern or disclosure takes place outside of the UK, Anti-Slavery International Representatives must be aware of and adhere to the legislation of the country in which the concern/disclosure arises, in addition to the procedures and guidance within the Anti-Slavery Safeguarding framework. Where the

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3 Anti-Slavery is involved with a number of safeguarding networks and is seeking to identify an appropriate resource to assist with understanding the relevant legislation in each country where we work. Reference to this will be included in the policy when it is available. Please discuss with partners in the meantime.
concern/disclosure is in relation to a vulnerable adult employed (paid or unpaid), contracted by or supported by a partner organisation, Anti-Slavery International adheres to the Safeguarding Policy of the partner organisation. (See Section 5.2: Work with partners for more detail)

We encourage vulnerable adults who require support in order to either participate in our advocacy, monitoring and/or research or carry out their duties as a member of staff, volunteer or consultant to discuss their needs with the Anti-Slavery International DSO.

Procedure A: Alleged harm caused, or likely to be caused to concern about a vulnerable adult by a Representative of Anti-Slavery International whilst overseas

The individual who is told about, hears, or is made aware of the concern/disclosure is responsible for following the Cause a Concern Procedure A.

1. If a vulnerable adult is in immediate danger, follow the procedure outlined in the partner organisation’s policy (See Section 5.2 Work with partners). This may include calling the police, though caution should be exercised and local advice observed.

2. Share the concern with the Anti-Slavery Head of Programmes immediately. If the vulnerable adult does not give permission to share the concern, they should seek advice from the Head of Programmes without identifying the vulnerable adult. It is important that the Representative who
allegations are made against is named as they may pose a risk of harm to others

3. Where the Head of Programmes is unavailable, or the concern involves the Head of Programmes, the concern/disclosure should be reported to the CEO and/or Nominated Trustee for Safeguarding

4. Identify and follow the relevant laws for the country in question [Anti-Slavery intends to develop a resource with the required information for each of the countries in which we work and/or visit]

5. Where a concern has been reported to an external body (such as the police in an emergency), inform the Head of Programmes immediately

6. All verbal disclosures are recorded in writing. Individuals who report concerns are required to complete a Cause for Concern form, to be sent to the HoP within 24 hours of a concern/disclosure being raised. Where a vulnerable adult has not given permission for the concern to be shared, the report should not include the vulnerable adult’s name or any other identifiable details

7. On receiving a concern/disclosure, the Head of Programmes informs the CEO, Nominated Trustee for Safeguarding, Head of Finance and Resources and the individual’s Line Manager or Nominated Trustee for Safeguarding, as well as the partner organisation. Together they decide on what action to take on a case-by-case basis, prioritising the well-being of children and vulnerable adults and based on the legislation of the country in which the concern/disclosure arises; AND the legislation of the alleged perpetrator’s country of residence; AND both Anti-Slavery International’s and the partner organisation’s policies. Where policies and legislation have differing requirements, the advice of the Safeguarding Advisor and, where required, legal advice is sought

8. Where the concern does not meet the threshold of an external agency such as the police or Adult Social Services, or where Anti-Slavery International has reason to conduct their own investigation after the completion of an external investigation, Anti-Slavery International may conduct their own investigation into the incident. The investigation is conducted by the partner organisation, Nominated Trustee for Safeguarding and the External Safeguarding Advisor. Where required, an in-country safeguarding specialist may be contracted to lead the investigation

9. It is imperative that the investigation is conducted as promptly as possible although the exact duration of the investigation depends on the nature of the concerns and the different stakeholders involved

10. Advice may be sought from other organisations based in country who may have experience of handling similar concerns and disclosures. If advice is sought, names and other identifying details should not be shared

11. An individual who has allegations made against them may be temporarily suspended from their role without prejudice for the duration of the investigation if Anti-Slavery International deem it necessary to prioritise the safety and well-being of others. The individual may seek advice and support from the Head of Finance and Resources; the Citizen’s Advice Bureau; FACT (a support organisation for individuals with allegations made against them in a work setting – 0843 2892 016) or other organisations or their choosing

12. The Head of Programmes is responsible for updating records and storing them securely. Where concerns have been raised about an adult’s behaviour around children or vulnerable adults, Anti-Slavery International keeps the records in their personnel file either until they reach the age of 65 or for 10 years - whichever is longer (IRMS, 2016). This applies to volunteers and paid staff. Anti-Slavery maintains records where the allegations were unfounded. However, if it is found that allegations are malicious the records are destroyed immediately. This also applies to cases involving a partner organisation or someone supported by a partner organisation.

13. Where feasible and where permission is given by the vulnerable adult, individuals involved in the concern/disclosure are to be kept up to date with proceedings. It may not be possible to give a clear indication of how long proceedings may take as this is dependent on additional information that can
emerge; and the actions that external authorities take

14. Access to counselling and other reasonable support may be offered to those involved in concerns/disclosures related to Anti-Slavery International. If you would like to discuss this, contact the DSO or Head of Programmes.

**Procedure B: Alleged harm caused, or likely to be caused to a vulnerable adult by a partner organisation’s Representative, observed by or reported to an Anti-Slavery Representative**

The individual who is told about, hears, or is made aware of the concern/disclosure is responsible for following the Cause for Concern Procedure B.

Apply steps (1) to (6) outlined in Procedure A.

7. On receiving a concern/disclosure, the Head of Programmes informs the CEO and Nominated Trustee for Safeguarding, as well as the partner organisation unless doing so poses (further) risk of harm to someone. Together they decide on what action to take on a case-by-case basis, prioritising the well-being of children and vulnerable adults and based on the legislation of the country in which the concern/disclosure arises; AND the legislation of the alleged perpetrator’s country of residence; AND the partner organisation’s policy.

8. Where the concern does not meet the threshold of an external agency such as the police, or where Anti-Slavery International has reason to conduct their own investigation after the completion of an external investigation, Anti-Slavery International may conduct their own investigation into the incident. The Head of Programmes, CEO and Nominated Trustee for Safeguarding decide who is appropriate to lead the investigation (where there is reason to believe that the partner organisation may not conduct a thorough or unbiased investigation, an in country safeguarding specialist may be contracted).

9. The Head of Programmes, CEO and Nominated Trustee for Safeguarding make a decision as to whether to continue, suspend or terminate funding pending the outcome of an investigation.

10. It is imperative that the investigation is conducted as promptly as possible although the exact duration of the investigation depends on the nature of the concerns and the different stakeholders
involved.

11. Advice may be sought from other organisations based in country who may have experience of handling similar concerns and disclosures. If advice is sought, names and other identifying details should not be shared.

12. The Head of Programmes is responsible for updating records and storing them securely. Anti-Slavery International keeps records for the duration of the partnership and ten years afterwards. Anti-Slavery maintains records where the allegations were unfounded. However, if it is found that allegations are malicious the records are destroyed immediately. This also applies to cases involving a partner organisation or someone supported by a partner organisation.

13. Where feasible and where permission is given by the vulnerable adult, individuals involved in the concern/disclosure is kept up to date with proceedings. It may not be possible to give a clear indication of how long proceedings may take as this is dependent on additional information that can emerge; and the actions that external authorities take.

14. Access to counselling and other reasonable support may be offered to those involved in concerns/disclosures related to Anti-Slavery International. If you would like to discuss this, contact the DSO or Head of Programmes.

Procedure C – Alleged harm caused, or likely to be caused to a vulnerable adult, perpetrated by individuals who are not Representatives of either Anti-Slavery International or partner organisations

Through their work, representatives of Anti-Slavery International may also encounter abuse of vulnerable adults within the community by individuals unconnected to either Anti-Slavery International or any of our partner organisations. Although intervention in such cases presents additional complexities, the organisation has a duty to ensure the protection of all vulnerable adults regardless of their relationship with the work of Anti-Slavery International.

1. If a vulnerable adult is in immediate danger, follow the procedure outlined in the partner organisation’s policy. This may include calling the police, though caution should be exercised and local advice heeded.

2. Share the concern with the local partner organisation’s DSO (or Director if there is no DSO assigned) and Anti-Slavery Head of Programmes immediately. If the vulnerable adult does not give permission
to share the concern, seek advice from the local partner without identifying the vulnerable adult.

3. All verbal disclosures are recorded in writing. Individuals who report concerns are required to complete a Cause for Concern form, to be sent to the HoP and partner organisation within 24 hours of a concern/disclosure being raised. Where a vulnerable adult has not given permission for the concern to be shared, the report should not include the vulnerable adult’s name or any other identifiable details.

4. On receiving a concern/disclosure, the Head of Programmes and the partner organisation decide on what action to take on a case-by-case basis, prioritising the well-being of children and vulnerable adults and based on the legislation of the country in which the concern/disclosure arises. The national partner and Head of Programmes may choose to consult with the Anti-Slavery Safeguarding Advisor and/or other local organisations with safeguarding experience to decide on next steps. If advice is sought, names and other identifying details should not be shared. A decision may be taken to inform other local organisations who the alleged perpetrator/vulnerable adult is affiliated with if it is legally permitted to do so; and doing so does not put anyone at risk of (further) harm.

5. The HoP and local partner organisation are responsible for updating records and storing them securely.

6. Where feasible and where permission is given by the vulnerable adult, individuals involved in the concern/disclosure is kept up to date with proceedings. It may not be possible to give a clear indication of how long proceedings may take as this is dependent on additional information that can emerge; and the actions that external authorities take.

7. Access to counselling and other reasonable support may be offered to those involved in concerns/disclosures reported to or witnessed by an Anti-Slavery International Representative. If you would like to discuss this, contact the DSO or Head of Programmes.

Safeguarding Adults in the UK

This includes:

1. All staff, volunteers and consultants employed (paid and unpaid) by Anti-Slavery International who are UK citizens, living in/visiting the UK and/or working in the UK for Anti-Slavery International

2. All individuals and groups who Anti-Slavery comes into direct contact with in the UK or who are UK citizens situated abroad, including those we interview, conduct research with, and those who participate in monitoring and evaluation that we conduct about our own or our partners’ services.

   Note – where there is a concern/disclosure about a vulnerable adult in the UK occurring within the community and perpetrated by individuals not associated with either Anti-Slavery International or a partner organisation – see Procedure C.

If a concern or disclosure takes place in the UK, Anti-Slavery International follows UK best practice and always supports a vulnerable adult (referred to as ‘adult at risk’ in the UK) to make informed choices about how to respond to abuse they are experiencing or have experienced, unless we have good reason to believe they do not have the mental capacity to do so, or someone else is at risk of harm. We recognise that some adults at risk may choose not to take any action. (If the adult does not give permission to share the concern see point 3 in the procedure below). Our procedure for responding to concerns and disclosures about adults at risk in the UK is in line with UK legislation and guidance, namely:

- Care Act (2014)
- Mental Capacity Act (2005)
- Sexual Offenses Act (2003).

Anti-Slavery International embodies the safeguarding adults at risk principles within the Care Act (UK, 2014):
1. **Empowerment**: Personalisation, the presumption of person-led decisions and informed consent
2. **Prevention**: It is better to take action before harm occurs
3. **Proportionality**: Proportionate and least intrusive response appropriate to the risk presented
4. **Protection**: Support and representation for those in greatest need
5. **Partnership**: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse
6. **Accountability**: Accountability and transparency in delivering safeguarding.

**Procedure D: Alleged harm caused, or likely to be caused to a vulnerable adult by a Representative of Anti-Slavery International whilst in the UK**

The individual who is told about, hears, or is made aware of the concern/disclosure is responsible for following the Cause for Concern *Procedure D*.

Although Anti-Slavery International has limited contact with vulnerable adults in the UK within the course of its work, events may be held which involve people or allegations may come to light regarding the abuse or harm of individuals unconnected to the organisation by an Anti-Slavery International representative. In either circumstance, representatives of Anti-Slavery International have a duty to respond and report their concerns.
1. If you observe or receive reports that a representative of Anti-Slavery International is behaving in a way that is or is likely to cause harm to a vulnerable adult, your first responsibility is to ensure the safety of the individual. This does not imply a responsibility to intervene directly as this could cause more harm and may also put you at risk. Rather, it implies a responsibility to consider the safety of the person before all other actions and take all reasonable action possible to ensure their well-being.

2. If someone is in immediate danger, call the police (999)

3. Ask the vulnerable adult for permission to share the concern with the Anti-Slavery Head of Programmes. If the adult does not give permission to share the concern and individual is unclear on what action to take, seek advice from the Head of Programmes without identifying the vulnerable adult. If there is reason to believe a third party is at risk of harm; or the adult does not have the mental capacity to make the decision as to whether to report or not, report your concern to the Head of Programmes.

4. Where the Head of Programmes is unavailable, or the concern involves the Head of Programmes, report the concern/disclosure to the CEO and/or Nominated Trustee for Safeguarding.

5. Where a concern has been reported to an external body (such as the police in an emergency), inform the Head of Programmes immediately.

6. All verbal disclosures are recorded in writing. Individuals who report concerns are required to complete a Cause for Concern form, to be sent to the HoP within 24 hours of a concern/disclosure being raised. Where a vulnerable adult has not given permission for the concern to be shared (having the mental capacity to make this decision and assessing that no third party is at risk of harm), the report should not include the adult at risk’s name or any other identifiable details.

7. If the adult at risk has a carer they are informed of concerns or disclosures only if the adult at risk gives permission to do so.

8. On receiving a concern/disclosure, the Head of Programmes informs the DSO, CEO and Nominated Trustee for Safeguarding (unless the concern is about one of the named positions). Together they decide on what action to take as appropriate on a case-by-case basis, prioritising the well-being of children and adults at risk at all times. Dependent on the concern/disclosure, a referral may be made to:
   a. Head of Finance and Resources (where an allegation against a member of staff is made);
   b. The police in an emergency (999);
   c. Local Authority Safeguarding Adults Board;
   d. Other relevant Adult Social Care services;
   e. Designated Officer (England; Wales);
   f. National Disclosure and Barring Service for concerns/disclosures about a member of staff, consultant, coach, official or volunteer;
   g. Local police force;
   h. Child Exploitation and Online Protection (CEOP - for concerns and disclosures about online abuse);
   i. Prevent Officer (within local and national police forces, for concerns about adults at risk of being drawn into extremism or terrorist activity) (see Appendix A – Glossary of Terms).

9. Where the concern does not meet the threshold of an external agency such as the police or Adult Social Services, or where Anti-Slavery International has reason to conduct their own investigation after the completion of an external investigation, Anti-Slavery International may conduct their own investigation into the incident. One reason for this may be that the police require evidence that is ‘beyond reasonable doubt’ whereas Anti-Slavery International requires a balance of probabilities in order to make a safeguarding decision. The investigation is conducted by the Nominated Trustee for Safeguarding in collaboration with the External Safeguarding Advisor.
10. It is imperative that the investigation is conducted as promptly as possible although the exact duration of the investigation depends on the nature of the concerns and the different stakeholders involved.

11. An individual who has allegations made against them may be temporarily suspended from their role without prejudice for the duration of the investigation if Anti-Slavery International deem it necessary to prioritise the safety and well-being of others. The individual may seek advice and support from the Head of Finance and Resources; the Citizen’s Advice Bureau; FACT (a support organisation for individuals with allegations made against them in a work setting – 0843 2892 016) or other organisations or their choosing.

12. The Head of Programmes is responsible for updating records and storing them securely. Where concerns have been raised about an adult’s behaviour around children or adults at risk, Anti-Slavery International keeps the records in their personnel file either until they reach the age of 65 or for 10 years - whichever is longer (IRMS, 2016). This applies to volunteers and paid staff. Anti-Slavery maintains records where the allegations were unfounded. However, if it is found that allegations are malicious the records are destroyed immediately.

13. Where feasible and where permission is given by the vulnerable adult, individuals involved in the concern/disclosure are kept up to date with proceedings. It may not be possible to give a clear indication of how long proceedings may take as this is dependent on additional information that can emerge and the actions that external authorities take.

14. Access to counselling and other reasonable support may be offered to those involved in concerns/disclosures related to Anti-Slavery International. If you would like to discuss this, contact the DSO or Head of Programmes.

Recording information: confidentiality and information sharing

All concerns that you may have or receive should be recorded, ideally using the Anti-Slavery International Cause for Concern form. Where feasible, the vulnerable adult should lead on the report, with your input as required.

You and the vulnerable adult are recording this information for an accurate record of what happened.

When completing the Cause for Concern form you should:

- Support the vulnerable adult to complete the form themselves
- Report the facts – what you have observed/seen, heard or had reported to you
- Distinguish between what is your own personal knowledge and what you have been told by other people
- If you know the adult well, you may have an opinion on the concern. If this is the case, clearly state that it is your opinion and why you are giving it.

Information should be shared on a ‘need to know’ basis. It should not be shared with friends and acquaintances.

Non-recent allegations

Anti-Slavery International encourages individuals and organisations to discuss any concerns about non-recent abuse with the Anti-Slavery HoP. We take non-recent allegations extremely seriously and adhere to the procedures outlined in this policy.

Whistleblowing

Anti-Slavery International takes all safeguarding concerns and disclosures extremely seriously, prioritising
the well-being of children and vulnerable adults. Our whistleblowing policy highlights our stance on protecting and supporting anyone who whistle blows. Where an individual or organisation believes that good practice has not been adhered to:

- Contact the DSO, Head of Programmes, CEO or Nominated Trustee for Safeguarding.
- If the above individuals do not resolve your concern, the Anti-Slavery Complaints Policy outlines our formal complaints process.
- Alternatively, you can contact the NSPCC Whistleblowing advice line (0800 028 0285; email help@nspcc.org.uk).

Organisational learning
It is important that safeguarding cases are used to inform and develop practice within Anti-Slavery International and the work of our partners. During the annual policy review and in the development of training, Anti-Slavery International reviews the management of cases and uses the learning and knowledge gained to inform future policies and procedures as well as the practice of our staff, Representatives and partners. No details that identify individuals involved in the concern/disclosure are included.

SECTION 8: RELATED POLICIES, PROCEDURES AND GUIDANCE

- Child Safeguarding Policy
- Code of Conduct
- Whistleblowing policy
- Grievance procedure
- Disciplinary policy
- Dignity at Work policy
- Managing Performance and Capability policy
- Recruitment policy.

SECTION 9: SAFEGUARDING IN YOUR ROLE: SPECIALIST TOPICS

Anti-Slavery International recognises that not all roles are involved in recruitment, visiting projects, advocacy and/or communications. The following sections should be read and adhered to as they apply to you in your role.

Specialist Topic: 9.1 Safe recruitment and training

Anti-Slavery International recognises that individuals who wish to cause harm to children and/or vulnerable adults may seek employment in organisations which enable access to them. To address this risk, safe recruitment procedures are in place for all Representatives of Anti-Slavery International – paid or unpaid, employed or freelance, permanent or on time-limited contracts. All Representatives are provided with information and training about safeguarding to ensure that they are aware of their responsibilities and the consequences of breaching Anti-Slavery International’s Safeguarding Policy.

9.1.1 Safeguarding recruitment requirements

1. All roles are assessed by the DSO and Head of Finance and Resources to assess which safeguarding requirements are applied. All roles that have regular contact with partner organisations, direct contact with participants (including monitoring, evaluation and interviewing), and/or access to
sensitive information about children/vulnerable adults must consider the below safeguarding requirements.

2. All job descriptions include the following sentence:
   Anti-Slavery International is committed to safeguarding all children and adults that our staff and representatives encounter. Candidates will be subject to appropriate verification for suitability and will be required to commit to uphold our safeguarding policies.

3. The approving manager verifies that the safeguarding requirements (points 1 & 2 above) are met for each job description.

4. Every interview must include a question on safeguarding.

5. Reference checks include questions about the individual’s experience of working with children/vulnerable individuals and their perceived suitability to do so.

6. Two written references are required for each staff member, which include relevant reference to safeguarding. These are seen and signed off by the DSO and Head of Finance and Resources before candidates take up their role in Anti-Slavery International.

7. Where relevant, a DBS check is completed, seen and signed off by the Head of Programmes prior to confirmation in post.

9.1.2 Employed staff and interns
   - All posts have job descriptions and key selection criteria to improve the likelihood of attracting the right person for the job.
   - All candidates complete a CV and supporting letter in which they describe their relevant experience, including (where relevant) past experience working with children and/or vulnerable adults.
   - Applicants are asked to fully declare whether they have any criminal convictions, spent or unspent. A false declaration that results in employment may render the person liable for dismissal without notice.
   - Candidates must explain any gaps in employment history.
   - A conditional offer of employment is only made upon receipt of two satisfactory written references. Acceptable referees exclude family members and those who have known the applicant personally for under two years.
   - For posts which involve travel to partner programmes or include direct contact with children and/or vulnerable adults, a DBS check ⁴ is completed ⁵. Staff members are not allowed to visit partner’s programmes until a satisfactory DBS is received and DBS checks are renewed every two years.
   - Where a prospective member of staff or intern has not lived in the UK for the last five years, a criminal records check from the countries they previously lived in is also requested. Where DBS and Police Checks cannot be obtained, Anti-Slavery International reserves the right to call referees to seek further information in relation to the candidate’s suitability to work with children and/or vulnerable adults.
   - All staff are required to read Anti-Slavery International’s Safeguarding Policies and sign a Statement of Commitment (Appendix F).
   - Staff receive training every year when the policy is reviewed and updated.
   - Additional Train the Trainer (ToT) training is provided to the Programmes Team and Senior Members of staff who have regular contact with partners. The training aims to enable team members to

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⁴ DBS checks only cover an individual’s criminal history in the UK so this may not be possible, useful or complete for all Representatives.

⁵ In this policy, a ‘completed’ check means a request issued and response received from the Disclosure and Barring Service which has been seen and signed off by the Head of Programmes.
support and advise partners in implementing safeguarding procedures and responding effectively to concerns and disclosures

- The Designated Safeguarding Officer, Head of Programmes, CEO and Nominated Trustee for Safeguarding receive specialist training to support them in fulfilling their roles.

9.1.3 Volunteers

As a general rule, volunteers do not visit partners’ programmes and do not have direct contact with children or vulnerable adults as part of their work. In the unusual situation where a volunteer does visit a partner’s programme, the following safeguards are put in place:

- A verbal reference is obtained which specifically explores the individual’s suitability to be in direct contact with children and/or vulnerable adults
- A DBS check is completed prior to departure
- The volunteer receives a briefing from the DSO or member of the programmes team prior to departure which includes expectations in regard to safeguarding
- The volunteer is accompanied by employed staff from either Anti-Slavery International or the partner organisation at all times whilst with children and/or vulnerable adults.

In general, volunteers do not have access to any personal data (photos, address, personal histories etc.) held about children or vulnerable adults as this is stored on the shared drive and requires specific access permission. Where the role taken by the volunteer demands access to personal data (for example, where the role is to review/ develop case studies or to organise/catalogue photos) a verbal reference is obtained which specifically explores the individual’s suitability to have access to sensitive information and to maintain confidentiality.

All volunteers are required to read Anti-Slavery International’s Safeguarding Policy and sign a Statement of Commitment (Appendix F).

Anti-Slavery International does not organise volunteer placements with partners overseas. Where requests for voluntary placements are received, Anti-Slavery International may provide details of relevant volunteering agencies within the region or, on rare occasions, facilitate an introduction to an organisation that has a volunteering programme. In such instances, it is the responsibility of the volunteer agency or local organisation to conduct all relevant checks prior to offering a volunteer placement and to provide adequate orientation and support to the individual during their placement. Where contact is facilitated with a partner organisation, Anti-Slavery International clearly stipulates that the organisation is under no obligation to offer a volunteer placement and refusal to do so in no way affects the relationship with Anti-Slavery International.

9.1.4 Freelance and contractors

On occasion, Anti-Slavery International commissions consultants or freelance staff to undertake work with partner organisations. This may include journalists, photographers, evaluators and trainers. In these circumstances, the following safeguards are place:

- All consultants and freelance staff receive the Safeguarding policies as part of their pre-departure preparation which they must read and agree to adhere to
- Contracts contain a clause requiring adherence to Anti-Slavery International’s Safeguarding Policy. Failure to comply could result in a termination of the contract and may affect the payment of agreed fees
- Where the consultant is expected to have direct contact with children and/or vulnerable adults, a DBS check is completed prior to departure
- For all freelance staff and contractors working directly with vulnerable children and/or adults, a minimum of one reference is obtained. Where the individual is expected to have extensive direct contact with children and/or vulnerable adults, a second reference is obtained. Both specifically explore their suitability to work with children/vulnerable adults.
• All consultants and freelance staff receive a briefing prior to departure which includes expectations in regard to safeguarding
• Whilst on visits, consultants and freelance staff are always accompanied by a member of staff from either Anti-Slavery International or the local partner when in direct contact with children/vulnerable adults. Where it is not appropriate for a staff member to be present (such as where feedback about programme quality is being sought), the consultants/freelance staff are accompanied by another responsible adult (such as a teacher or parent).

9.1.5 Undercover reporters
Our capacity to collect information and publish reports about human rights abuses is an essential aspect of Anti-Slavery International’s work. On rare occasions, this requires journalists and reporters to work undercover which necessarily precludes adherence to certain aspects of the safeguarding policy:
• Undercover reporters may not be accompanied when in contact with children or vulnerable adults
• Undercover reporters may not be able to obtain consent for the photos or stories that may later be used by Anti-Slavery International (see Section 9.4: Communications Guidelines)

Bringing attention to unreported human rights abuses is essential to influencing decision-makers and bringing about change on a global level but it does raise additional risks, both for the reporter and for those they may come in to contact with. In order to manage these risks, Anti-Slavery International:
• Prior to any undercover mission involving contact with children or vulnerable adults, a meeting is held with Senior Managers and the DSO to assess likely risks and clarify whether the additional risks are defensible in light of the wider aim of the mission
• The mission must receive formal sign off from the CEO and any potential risks to children or vulnerable adults must be mitigated as far as possible (Appendix C: Undercover Mission Approval)
• Wherever possible, two references are gained for the reporter including requesting information on previous experience and conduct when in contact with children or vulnerable adults
• A thorough briefing is provided prior to the mission which includes clear expectations in regard to safeguarding and the reporting of concerns.

9.1.6 Other visitors to Anti-Slavery programmes
On occasion, Anti-Slavery International receives requests to visit our programmes from donors, patrons and other interested parties. Although Anti-Slavery International may request that a partner receive a visit from an external representative, it is the partner who ultimately determines whether the visit may take place, when this may happen and what contact with children and vulnerable adults is appropriate.

If a visit is agreed, the following safeguards are put in place:
• All visitors are required to read Anti-Slavery International’s Safeguarding and Protection Policies, sign a Statement of Commitment (Appendix F)
• The visitor receives a briefing from the DSO or member of the programmes team prior to departure which includes expectations in regard to the safeguarding
• The visitor is accompanied by an employed staff from either Anti-Slavery International or the partner organisation at all times whilst with children and/or vulnerable adults.

Where Anti-Slavery International are notified of but do not directly facilitate a visit to a partner (such as a donor providing grants directly to the partner they wish to visit), the responsibility for ensuring all relevant safeguards are in place rests with the partner organisation. However, in supporting partners to develop and strengthen their safeguarding procedures, Anti-Slavery International stresses the importance of implementing safeguards with all visitors irrespective of their status, the funding relationship or the individual’s celebrity.
9.1.7 Incomplete DBS and police checks
In very rare circumstances where a DBS or police check is incomplete due to time-bound deadlines, Anti-Slavery International asks for two employer references. Anti-Slavery International reserves the right to call referees to seek further information in relation to the candidate’s suitability to work with children. The Head of Programmes and CEO agree how to proceed on a case-by case-basis, given the relevant particularities, always prioritising the safety and well-being of children and vulnerable adults in their decision-making.

Specialist Topic: 9.2 Visiting projects and direct contact with vulnerable adults

9.2.1 Preparation for visits
- When visiting partner organisations, familiarise yourself with to understand the local legislation as well as cultural and religious norms, particularly those related to contact between children or vulnerable adults, and reporting concerns to authorities
- Ensure that you wear clothing that is appropriate to the local culture and religion
- Read the partner’s Safeguarding policies (where they exist) prior to departure and ensure you know who to go to with any concerns
- Discuss contact with children and vulnerable adults with the partner in advance to identify and minimise any potential risks
- Ensure you are accompanied by a member of staff from the partner at all times when with children and/or vulnerable adults. Where it is not appropriate for a staff member to be present (such as where feedback about programme quality is being sought), ensure you are accompanied by another responsible adult (such as a teacher, social worker, carer).

9.2.2 Interactions with children and vulnerable adults
- Always ensure that everyone knows who you are and why you are visiting
- Always treat everyone with respect and never act in a way which could shame, humiliate or degrade them
- Never show favouritism or spend excessive time with one person (adult or child)
- Avoid offering gifts to individuals. Gifts should only be given to the group as a whole and should be of minimal value
- Avoid being alone with children or vulnerable adults, or placing yourself in any situation which could be misinterpreted
- Never take a child or vulnerable adult in your car, to your hotel or to any other private spaces
- Never share personal details about yourself (including your hotel, home address or contact details) or agree to connect with children or vulnerable adults on social media.
- Never take photographs unless there is a clear purpose and it is with informed consent.

9.2.3 Physical contact with children and vulnerable adults
- Always wait for the child or vulnerable adult to initiate any type of physical contact - remember your presence may be unsettling and any attempt to initiate physical contact may be misinterpreted
- Never hit or physically chastise anyone (including using physical restraint to contain behaviour unless absolutely necessary)
- Never give assistance in aspects of personal care (such as dressing, bathing)
- Never engage in or allow sexually provocative games with children or vulnerable adults, or behave in a manner which might be considered inappropriate or sexually provocative
- Never sleep in the same room or bed as a child or vulnerable adult with whom you are working
- Never develop physical/sexual relationships with anyone supported by the partner organisation (child or adult).
Specialist Topic: 9.3 Involving vulnerable adults in advocacy

9.3.1 Listening to vulnerable adults
Interviewing vulnerable adults for case studies and other reports is essential to raise awareness of slavery and influence decision makers. It is important to remember that most adults involved in partner organisation’s programmes are or have been at risk of harm. Whilst case studies can have a positive impact, recounting stories of slavery or past abuse can be distressing for the participant and every attempt must be made to ensure that interviewing does not re-traumatise them in anyway.

Whenever people are interviewed for case studies or other report, the following safeguards are in place:

9.3.2 Before interview:
- **Informed Consent:** Informed consent for interviews extends beyond explaining how the information may be used. It includes explaining in detail what topics are going to be covered so the person can make an informed choice about whether they want to participate.
  An explanation of what will be discussed and initial consent should be gained prior to the interview by a member of staff who knows them and without the interviewer being present. This enables the participant to feel more comfortable refusing to participate if they so wish.
  The interviewer should review the adult’s understanding of consent at the start of the interview and again summarise the topics that will be covered. A written consent form must be completed prior to using the material obtained during the interview.
- **Provision of support:** There should be someone else present during the interview who the adult is familiar with, if they request it. Wherever possible, the participant should be given a choice regarding who supports them during the interview.
- **Respecting the right to say NO:** Be clear before you start the interview that the participant only has to talk if they are comfortable doing so, and they can stop and withdraw their consent at any point.
- **Sensitivity:** If you are likely to talk about potentially unsettling or emotional issues, the participant must be aware of and consent to these subjects being raised. The interviewer needs to pay close attention to the adult’s body language and responses and offer to stop the interview if they appear to be uncomfortable or upset at any point.
- **Gender:** When arranging an interview, consideration must be given to the needs of different people and whether the gender of the interviewer may affect how comfortable the participant feels in responding. Wherever possible, the adult should be given a choice about the gender of the person who they speak to. Gender must also be considered when deciding what topics may be discussed.
- **Respecting the right to information:** If you are going to take notes, or record the interview in another way, you must explain this to the participant and verbally ask their permission to do so. You should also explain how the recording/notes will be stored and who will have access to it.

9.3.3 During the interview:
- **Respect agreements:** It is not appropriate for the interviewer to delve into new areas that the adult participant has not agreed to talk about. This is a breach of trust and may be harmful to the person.
- **Body language:** Try and ensure that your body language helps to put the participant at ease – make eye contact but don’t stare; smile. Also, be aware of body language and acknowledge that they may be finding things a little difficult or strange – this shows that you are listening and are sensitive to their needs. If they look uncomfortable or upset at any point, suggest that the interview is paused so they can take a break. Remind them that they can stop the interview at any time if they want to continue.

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Anti-Slavery International does not adhere to an interpretation of gender identity as solely male or female but consider that a person’s internal sense of themselves may be outside of this binary categorisation. Please see Anti-Slavery International’s Gender Policy for further information.

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6 Anti-Slavery International does not adhere to an interpretation of gender identity as solely male or female but consider that a person’s internal sense of themselves may be outside of this binary categorisation. Please see Anti-Slavery International’s Gender Policy for further information.
• **Style of questioning:** Ask non-leading, open-ended questions, do not make assumptions or fill in words, or finish sentences. Clarify your understanding if you are not clear.

• **Non-Judgemental:** Do not make value judgements regarding participants’ responses or impose your values and understanding of the world. Be aware that judgements can be conveyed non-verbally and attempt to manage your reactions carefully.

• **Next steps:** At the end of the interview, thank the participant for their time and briefly explain again how the information that has been shared will be used. As much as possible, stress the positive impact that their story may have for others. Outline the measures that are taken to ensure their privacy and remind them that if they have any questions or change their mind about the story being used, they should tell staff at the partner organisation.

### 9.3.4 Advocating with vulnerable adults

Anti-Slavery International recognises the right of all people to be listened to in matters which affect them. One area in which people may become actively involved in our work is in advocacy aimed at ending slavery. It is important to remember that most adults involved in partner organisation’s programmes are or have been at risk of harm. Although Anti-Slavery International believes that project participants have a valuable contribution to make to this process, we also recognise that involving them in advocacy could expose them to additional risks of harm such as:

- Individuals may exact retribution for them speaking out
- People may be stigmatised by individuals in their communities who do not agree with their views
- Participants may have unrealistic expectations of how the situation might improve as a result of their actions and feel let down as a result.

To address these risks, involving people at risk in advocacy always form part of wider project planning in which the risks and benefits of the strategy are carefully considered. Where advocacy involving children and/or vulnerable adults is deemed to be important, a full assessment of the risks is conducted prior to initiating activities to ensure that everyone is safe and protected. Consent for involvement is also obtained.

Prior to becoming involved in any advocacy activity, participants are provided with training/information that covers:

- The issues to be addressed
- The ways of in which they can become involved
- Any potential risks that they need to consider and how they can keep themselves safe
- The potential impact or outcome of their involvement and the long-term nature of changing policies and attitudes

Everyone has the opportunity to withdraw at any time and no pressure (either direct or indirect) will be exerted to try and ensure that people continue to participate if they decide to withdraw.

### Attending International Events

Whilst Anti-Slavery International promotes everyone’s right to participation, this is often best achieved by working with people within their own environments where they have their own social support structures rather than taking them to one-off international events. Any decisions to take people to an international event must be based on the best interests of the individual with serious consideration given to the impact (both positive and negative) on them. A risk assessment must be completed prior to any visit to ensure that the individual’s needs are adequately prepared for.

Where Anti-Slavery International arranges for someone to attend an international event, they ensure:

- The person is accompanied by a chaperone/companion if the vulnerable adult chooses
- If the chaperone/companion is neither a family member nor employee, the relevant background checks and references are obtained
- The chaperone/companion receives a briefing on safeguarding and the expectations of their role prior to departure.
The chaperone/companion is provided with contact details for an 24 hours emergency person within Anti-Slavery International for the duration of the event as well as external emergency contact details (such as the police, medical services).

**Specialist Topic: 9.4 Communications guidelines**

Case studies, photos and videos are essential for raising awareness and combatting all forms of modern slavery. It must be recognised, however, that harm may be caused to people through the use of words, images and stories, although unintentionally. This section of the policy provides detailed guidance on both obtaining and selecting images and case studies for use in external communications. If you are unclear about whether photos or case studies are compliant with this policy, always consult with the DSO prior to use.

In communicating our work, Anti-Slavery International adheres to the following principles:

**9.4.1 Best interests of the individual**

Due to the nature of our work, many people that we work with will either be subject to or recently withdrawn from some form of slavery, making them more at risk of harm. The use of images and case studies is an essential tool in exposing and ending slavery. Achieving this end, however, should never expose individuals to risk of greater harm or reprisal from their ‘employers’ or slave masters and the best interest of the individual must always be the primary consideration.

In balancing these considerations, Anti-Slavery International:

a) Photos, videos and voice recordings:
- Wherever possible, images of people do not show any details which may serve to identify them (such as signs, landmarks)
- Where images contain identifying details, these are edited out prior to use
- Where images show a person’s face and can be linked to a specific location (such as a factory using forced labour) additional safeguards are put in place:
  - The partner organisation completes a brief risk assessment and approve the use of the photo, video and/or voice recording
  - A consent form is completed and signed by the adult (see Appendix D)
  - Final approval is sought from the DSO prior to use in external communications
- A decision may be made not to use the photo, video or voice recording.

b) Case Studies
- Anti-Slavery International only uses first names and this name is changed to protect the identity of people supported by us and/or our partners. The only exception to this safeguard is where the story is already in the public domain (e.g. someone nominated for an award)
- The exact location of the person is not be given. Information is restricted to giving the country or region in which the adult is living or working
- No additional factors are included which could be used to identify the adult (such as locations of work, details of their family or ‘employer’)
- Where it is considered necessary to include identifying details in order to expose slavery in a specific location, additional safeguards are put in place:
  - The partner organisation is asked to complete a brief risk assessment and approve the use of the case study
  - A consent form is completed and signed by the adult (Appendix D)
- Final approval is sought from the DSO prior to use in external communications.

### 9.4.2 Informed consent

Informed consent means that the people included in images and stories are aware of:

- How their photo/information will be used
- Who will see the photo/information
- How long the images will be used for
- How their privacy will be protected

Obtaining consent is viewed as a process rather than a one-off event. To achieve consent the following steps are followed:

In all cases, preliminary consent is obtained in the following way:

1. When meeting participants for the first time, all Anti-Slavery International Representatives explain who they are and why they are visiting
2. Prior to taking any photo or case study information, all Representatives ask verbal permission from the person
3. All Representatives of Anti-Slavery International must respect the participant’s wishes and if they decline to be interviewed or photographed no attempt should be made to change their mind
4. Where feasible, written/recorded consent is also obtained. Photos, videos and voice recordings that show/describe individuals so they can be identified are not placed in the public domain without written/recorded consent.

All photos, videos, voice recordings and case studies are shared with the Communications Manager who selects which are to be used in media and communications and checks there is consent to use the material.

**Consent from the adult**

Formal consent is obtained from people who are identifiable in stories, images and videos. However, Anti-Slavery International recognises that people’s ability to give informed consent varies. A person’s disability, literacy skills or the language they speak may make it harder for them to give informed consent, fully understanding what they are giving consent for, why and any implications this consent may have, such as being identifiable on a website or social media post. In recognition of this, Anti-Slavery International requires written and verbal consent to be in someone’s first language, using formats that enable the adult to give informed consent. Consent is requested to use the materials for five years, during which the person can withdraw consent at any time. If the organisation wishes to use the materials beyond this timeframe, fresh consent is obtained.

Where an adult has low levels of literacy, a videotape of consent may be obtained using a smart phone or other device. This includes a recording of:

- The person’s name and age
- The explanation given to the person of how the image/case study may be used and who may see it
- Their right to refuse or withdraw consent
- An explanation given as to how long the image may be kept for (typically five years), where and how (such as being stored securely in a password-protected computer file)
- Their right to state how long they consent for the image to be kept before it is safely destroyed
- Confirmation of the person’s understanding and consent
- Details of the date, location and the person obtaining the consent.

Verbal consent must be recorded and saved alongside the written consent form as this contains approval for usage from the partner organisation. All consent must be kept for the duration
of the permission given (typically five years); consent forms should then be destroyed securely at the same time as the image/recording.

Where possible, consent from the partner is obtained prior to obtaining consent from the participant as the partner must also complete a risk assessment, which is done with the participant, which approves use of the image/case study. If the partner and participant assess that usage would place the person at risk, the image/case study is not used and the participant is not asked for their consent.

The steps that are followed are:

1. The Programme Manager shares the selected materials with the partner organisation and asks them to complete some basic risk assessment information and approve the use of the image/recording/case study. This is done with the people who are identifiable
2. The consent form (Appendix D) is completed
3. Copies of consent forms are saved with the selected materials on the shared drive at Anti-Slavery International with clear instructions on how long Anti-Slavery has consent to keep the image/case study (typically 5 years) before they safely destroy it.

Consent from the vulnerable adult’s carer
Occasionally a vulnerable adult may not have the mental capacity to give their consent (see section 4.3). In these circumstances, images and case studies cannot be placed in the public domain unless there is a strong reason to do so and the partner organisation has worked with the carer to risk assess the implications of doing so do not place the vulnerable adult of (further) harm. In exceptional circumstances (such as the adult winning an award) the carer may give permission on behalf of the vulnerable adult. A carer and the adult they support is provided with an explanation of how the image/case study may be used, who may see it and their right to refuse and/or withdraw consent.

9.4.3 Selection of images
In selecting images and case studies for use in communications, Anti-Slavery International adheres to the following principles:

- **Dignity**
  - The person’s dignity must be preserved at all times
  - Language must not degrade, victimise or shame the person
  - Images should not be used which could shame, embarrass or humiliate the person, either now or in the future
  - In images, everyone should always be dressed appropriately and should not show anyone in pain or distress
  - Where images which contravene these standards are deemed necessary to expose a specific form of slavery, the person’s face should not be shown and approval must be sought from the DSO before use.

- **Accuracy**
  - The portrayal of people must not be manipulated or sensationalised in any way
  - Images and stories should provide a balanced depiction of the person’s life and should avoid reinforcing negative stereo-types or victimising them
  - After five years, or in line with the length of time the beneficiary gave consent for if shorter, photos and case studies are archived, in order to maintain a realistic view of our work and the children we support
Photographs may be used that are more than five years old (such as to show historical impact of Anti-Slavery International or to show the importance of long-term interventions), but dates are attached\(^7\) to the photos to show when they were obtained. Where there is no permission for a photo and it is less than 25 years old, it is not used because the individual(s) may remain identifiable and at risk of abuse if the photo is in the public domain.

**Privacy**
- All photos/case studies which are selected for use are stored on the shared drive and permission restricted to employed staff
- Access to view non-public photos and case studies by other individuals (such as other staff or journalists) is kept to an absolute minimum. Access must be requested and given in writing
- All photos/case studies which are not of publishable quality and are not selected for use are deleted
- Photos or case studies which are of publishable quality but are not selected for use are saved in an archive folder and permission restricted to employed staff. *Consent must be obtained before use of these photos or case studies.*

**9.4.4 Case studies and photos as evidence**

On rare occasions, Anti-Slavery International may be asked to share information and images obtained in the course of our work as evidence in criminal prosecutions. Prior to sharing information or images with the police, a meeting is held between the CEO, DSO and a Senior Representative of the partner organisation to risk assess whether disclosing information does put the person at additional risk. In circumstances where disclosure is likely to place the vulnerable adult at additional risk, Anti-Slavery International and the partner organisation endeavour to put additional safeguards in place prior to disclosing the material. Where there are significant risks that cannot be mitigated, Anti-Slavery International may decline the request. Legal advice is sought where necessary.

> Anti-Slavery International recognises that images and case studies obtained prior to this policy may not have the required consent stored on file. Anti-Slavery International is currently reviewing all external communications materials to ensure that they are compliant with the above guidelines.

**Signed:**

Nominated Trustee for Safeguarding [*name and date*]

CEO [*name and date*]

Safeguarding Designated Officer [*name and date*]

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\(^7\) Anti-Slavery International was founded in 1839 and records exist dating back over 100 years. When sharing archived records or images, Anti-Slavery International may not always be able to provide an exact date on which the information was obtained. In such cases, an indication of the approximate date is provided.
APPENDIX A: GLOSSARY OF TERMS

Adult at risk of abuse or neglect (UK terminology): an adult who has care and support needs; is experiencing, or is at risk of abuse or neglect; and because of their care and support needs cannot protect themselves against actual or potential abuse or neglect (based on the definition outlined in the Care Act 2014, UK).

Vulnerable adult (international terminology): an adult who is experiencing, or is at risk of, abuse, neglect or exploitation because of being in a position of social disadvantages due to one or more factors. The result is individual, and sometimes collective, vulnerability due to differences in power. These factors include (but are not limited to) poverty, migrant status, sex, gender, sexual orientation, disability, mental health, caste, religion, health, and age (based on World Health Organisation definition of vulnerable groups) (for a detailed list of factors, see Section 4.1).

FOR THE PURPOSE OF THIS POLICY, THE TERM ‘VULNERABLE ADULT’ IS USED THROUGHOUT, REFERRING TO THE ABOVE DEFINITIONS.

Safeguarding vulnerable adults: the responsibility of organisations to make sure their staff, volunteers and others associated with them, as well as operations and programmes, do no harm to vulnerable adults, or expose them to abuse or exploitation. Responding to concerns and disclosures about or from an adult in line with national legislation and organisational policy, prioritising the well-being of vulnerable adults at all times. For organisations to consider how to safeguard everyone in the organisation at all times, including protecting staff from inappropriate behaviour such as bullying and harassment. (based on Bond definition of safeguarding).

Abuse of a vulnerable adult: harm caused to a vulnerable adult, whether intentional or unintentional and whether it meets the legal threshold to take action or not. Examples of harm and abuse include: physical; sexual; psychological; financial; discriminatory; organisational and/or domestic abuse; exploitation; neglect; radicalisation; hate and mate⁸ crime; female genital mutilation; modern slavery; human trafficking; restraint; abuse as a result of membership of, or affiliation with, a stigmatised group (such as caste, religion, migrant, HIV status); and/or as a result of poverty.

Representatives of Anti-Slavery International: all board members, staff, volunteers, interns, consultants and others who visit programmes or have contact with people (both direct or indirect) in the name of Anti-Slavery International.

Direct contact with vulnerable adults: being in the physical presence of a vulnerable adult, whether the contact is occasional or regular, short or long term.

Indirect contact with vulnerable adults: having access to information on vulnerable adults in the context of the organisation’s work, such as their names, locations (addresses of individuals or projects), photographs and/or case studies.

Mental capacity: outlined in the Mental Capacity Act (2005, UK - see Section 4.3). The Act is designed to protect and empower adults who may lack the mental capacity to make their own decisions about their care and treatment and provide guidance for those who work with them to enable them to make decisions in the best interests of the vulnerable adult.

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⁸ a form of disability hate crime in which a vulnerable person is manipulated or abused by someone they believed to be their friend
UK legislation outlines examples of abuse that adults at risk may experience:

- Physical abuse – including assault hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- Sexual abuse – including rape and sexual assault or sexual acts to which the person has not consented or was pressured into consenting.
- Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- Modern Slavery – includes slavery, human trafficking, forced labour, and domestic servitude.
- Financial or material abuse – including theft, fraud, exploitation, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- Neglect and acts of omission – including ignoring medical 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.
- Self-neglect – this covers a wide range of behaviour neglecting to care for one’s personal hygiene, health or surrounding and includes behaviour such as hoarding. It is important to consider capacity when self-neglect is suspected. Also consider how it may impact on other family members and whether this gives rise to a safeguarding concern.
- Domestic abuse – including psychological, physical, sexual, financial, emotional abuse, so-called ‘honour’-based violence.
- Discriminatory abuse and hate crime – including discrimination on grounds of race, gender and gender identity, disability, sexual orientation, religion, and other forms of harassment, slurs or similar treatment.
- Organisational abuse – including neglect and poor care practice within an institution or specific care setting like a hospital or care home, e.g. this may range from isolated incidents to continuing ill-treatment.
- Radicalisation – exposing an adult to extremist ideas which could lead to terrorism (see Prevent below)
- Female Genital Mutilation
- Mate crime – exploitation of a vulnerable adult by a befriender
- Restraint – unlawful or inappropriate use of restraint or physical interventions.

Criminal Records Check: A disclosure of the relevant criminal records and other relevant information held by the police about an individual who will be working with children and/or adults at risk. In the UK, this check is administered through the relevant Registered Body and the DBS.

Disclosure & Barring Service (DBS): Formed by the merger of the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA) under the Protection of Freedoms Act 2012.

Designated Safeguarding Officer (DSO): the designated person appointed by Anti-Slavery International for leading on safeguarding and protection in our organisation.

Position of Trust: an individual who supports a vulnerable adult, such as a teacher, mentor, sports coach or carer. Individuals can misuse that position to groom or abuse a vulnerable adult.

Prevent Duty: the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.
Risk assessment: a procedure to help identify possible sources of danger and take appropriate action to minimise risks taking into account the age, number and competence of participants.

Key safeguarding and protection bodies in the UK:
Local Authority Adult Social Care Services: the Local Authority statutory agency with responsibility for safeguarding and protecting adults at risk, formerly known as Adult Social Services.

Local Authority Designated Officer (LADO – now referred to as DO): employed by the local council; responsible for managing all child and adult protection allegations made against staff and volunteers.

Police: Law enforcement in the UK. Most law enforcement is carried out by police officers serving in regional police services. The police can be contacted on 999 in an emergency, or 101 for non-emergency cases.

Interpol National Crime Bureau (NCB): part of the UK’s National Crime Agency linking national police with Interpol’s global network to address and prevent cross-border crime.

Child Exploitation and Online Protection Agency (CEOP): part of the UK’s National Crime Agency, CEOP tackles online abuse.
## APPENDIX B: CHECKLIST FOR REVIEWING SAFEGUARDING POLICIES

### BASIC DETAILS

<table>
<thead>
<tr>
<th>NAME OF ORGANISATION</th>
<th>COUNTRY</th>
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<tbody>
<tr>
<td>REVIEW COMPLETED BY</td>
<td>DATE</td>
</tr>
</tbody>
</table>

### CRITERIA

- **A** FULLY IN PLACE
- **B** PARTIALLY IN PLACE
- **C** NOT IN PLACE

### BASIC PRINCIPLES

- The organisation has a written policy
- The policy reflects best practice principles of safeguarding vulnerable adults (as outlined in the ASI Vulnerable Adults Safeguarding Statement and ASI policy)

### DEFINITIONS

- The policy includes a definition of vulnerable adults
- The policy includes a definition of the different forms of harm and abuse
- The policy includes reference to definitions of harm and abuse within national legislation

### SCOPE OF THE POLICY

- The policy covers all staff, volunteers, interns, consultants
- The policy includes safeguards for visitors to the organisation’s programmes

### ROLES & RESPONSIBILITIES

- The policy clearly identifies who staff can contact with concerns or for advice on safeguarding issues (e.g. DSO)
- The policy clearly describes the responsibilities of managers, directors & trustees in overseeing safe practice

### HUMAN RESOURCES

- The policy describes safeguards for the recruitment of staff (JDs, reference checks etc.)
- The policy describes safeguards for the recruitment of volunteers & interns
- The policy includes guidelines regarding training & support to staff
<table>
<thead>
<tr>
<th><strong>REPORTING PROCEDURES</strong></th>
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<tbody>
<tr>
<td>The policy includes a clear procedure for reporting concerns</td>
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<tr>
<td>The procedure provides information on what action should be taken, when and by whom</td>
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<tr>
<td>The procedure includes guidance on how and where to document concerns</td>
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<tr>
<td>The policy includes guidance on confidentiality</td>
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<table>
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<tr>
<th><strong>MEDIA &amp; COMMUNICATIONS</strong></th>
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<tr>
<td>The policy includes guidance on the use of photos, videos, voice recordings and case studies</td>
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<tr>
<td>The policy includes a procedure for gaining informed consent for the use of images &amp; personal information</td>
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<tr>
<td>The policy includes guidance on the use of information technology &amp; social media</td>
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<table>
<thead>
<tr>
<th><strong>DISSEMINATION &amp; REVIEW</strong></th>
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<tr>
<td>The policy is endorsed by the relevant management committee</td>
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<tr>
<td>The policy is translated into local languages &amp; shared widely</td>
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<tr>
<td>A simplified version of the policy is available or shared with children</td>
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<tr>
<td>The policy is reviewed at least every 3 years</td>
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## APPENDIX C: APPROVAL FOR UNDERCOVER MISSION

### Approval for Undercover Mission involving Children or Vulnerable Adults

#### Section A: Details of Mission

<table>
<thead>
<tr>
<th>Date of Mission:</th>
<th>Location:</th>
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**Summary of Mission:**

#### Section B: Details of Investigator

**Name:**

Has this investigator undertaken previous missions for Anti-Slavery International? *Yes/No*

If yes, provide brief details including details of any contact with children and/or vulnerable adults?

Have references been obtained regarding this investigator? *Yes/No*

If **yes**, provide brief details including details of any contact with children and/or vulnerable adults? If **no**, please explain why references have not been obtained & how this will be addressed.

#### Section C: Risk-Benefit Analysis

How will this mission contribute to the wider protection and well-being of children and/or vulnerable adults?? *(Benefit)*

How might this mission expose children and/or vulnerable adults to additional risks? *(Risks)*

What strategies could be put in place to mitigate these risks?

Are any additional risks defensible in light of the overarching mission objectives? *Yes/No*

Names & Role of Anti-Slavery International representative participating in approval meeting:

Signature (CEO):  
Date:
**APPENDIX D: CONSENT FOR USE OF IMAGES, RECORDINGS, CASE STUDIES AND PERSONAL INFORMATION**

**Section A: Approval from partner Organisation**

<table>
<thead>
<tr>
<th>Name of adult:</th>
<th>Date of birth:</th>
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<tr>
<td>Name of partner organisation:</td>
<td></td>
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<tr>
<td>Name of individual in partner organisation responsible for giving consent:</td>
<td></td>
</tr>
<tr>
<td>Role of named individual:</td>
<td></td>
</tr>
</tbody>
</table>

Has the adult given informed consent for the images and personal information to be used?  
Yes / No

Will use of this image or case study expose the person to any risk of harm?  
Yes / No  
If yes, please provide details

Can these risks be mitigated to make it safe for the image or case study to be used?  
Yes / No  
If yes, please provide details of the strategies that would be put in place

Approval for Anti-Slavery International to use the image or case study in external communications  
☐ Approved  ☐ Not Approved

Signed (adult): 
Date:

Signed (partner organisation Representative) 
Date:

Print Name:  
Role in Organisation:

**Section B: Approval from Anti-Slavery International’s Designated Safeguarding Officer**

Approval for Anti-Slavery International to use the image or case study in external communications  
☐ Approved  ☐ Not Approved

Additional Information:
**THIS INFORMATION IS CONFIDENTIAL. IT IS ONLY SHARED WITH THE RELEVANT STAFF. IT IS STORED SAFELY AND SECURELY.**

TO BE COMPLETED BY THE ADULT WHO IS GIVING CONSENT. *If the adult is unable to give informed consent (see Mental Capacity, 4.3), this form may be completed by their carer.*

<table>
<thead>
<tr>
<th>Name of adult:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of birth [if known]:</td>
</tr>
<tr>
<td>Address [or address of local partner if participant has no fixed address]:</td>
</tr>
<tr>
<td>Contact details (email/phone):</td>
</tr>
</tbody>
</table>

I give consent for the following of me to be used (tick):

- [ ] Photography
- [ ] Video Recording
- [ ] Voice recording
- [ ] Case Study (approved by me)

On the following:

- [ ] Social media (e.g. Facebook; Twitter)
- [ ] Anti-Slavery International’s website
- [ ] [Insert partner’s Name]’s Website
- [ ] Anti-Slavery International’s materials (e.g. annual reports; brochures)
- [ ] Named local partner’s materials (e.g. annual reports; brochures)

Please tick all that apply:

<table>
<thead>
<tr>
<th>Someone has explained to me that Anti-Slavery International is an organisation that tries to help people all over world</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anti-Slavery International would like to use a photo of me/a story about my life (delete as appropriate) to help people in other countries understand the problems children like me face. This will be used to try and help other people and to help to make things better</td>
</tr>
<tr>
<td>I understand that this photo/story will be seen by people in different countries but that my name will be changed and that no-one will be told where I live or work.</td>
</tr>
<tr>
<td>I understand that I can request any information related to me to be removed from the digital platform and/or public space at any point</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signed (adult):</th>
</tr>
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<tbody>
<tr>
<td>Date:</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Signed (partner organisation Representative):</th>
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<tbody>
<tr>
<td>Date:</td>
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</tbody>
</table>

| Print Name: |
| Role in Organisation: |
## APPENDIX E: CAUSE FOR CONCERN FORM

<table>
<thead>
<tr>
<th>Details of Report</th>
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<tbody>
<tr>
<td><strong>Concern Reported By</strong></td>
</tr>
<tr>
<td><strong>Date</strong></td>
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<tr>
<td><strong>Relationship of person reporting to Anti-Slavery International</strong></td>
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</tbody>
</table>

### Details of Concern

**Was the concern:**
- Observed
- Reported by a child/adult
- Reported by a Third Party

If reported by a third party, please state their name & relationship to the child/adult:

…………………………………………………………………………………………………………………………

### Details of Child/Children/adult(s) at risk:

<table>
<thead>
<tr>
<th>Name</th>
<th>Age/DOB</th>
<th>Gender</th>
<th>Name &amp; Tel No of Parent/Caregiver where relevant - required for children</th>
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**DETAILS OF Concern (What happened; When; Where; Who was involved)**

### Record of Decisions & Actions Taken

<table>
<thead>
<tr>
<th>Date</th>
<th>Description of Decisions /Action</th>
<th>Initials</th>
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<tbody>
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**Closure of Concern**

**Final Outcome:**
Anti-Slavery International
Statement of Commitment to Safeguarding

I, ______________________________ [name], have read and understood the procedures and guidelines outlined in Anti-Slavery International’s Safeguarding Policy.

I agree with the principles contained therein and agree to implement and promote the procedures and practices contained within this document while working or associated with Anti-Slavery International’s.

I understand that failure to comply could result in:

- Employed Staff & interns – disciplinary action
- Freelance Staff / Contractors – termination of contract
- Trustees – termination of Board membership
- Volunteers – ending the relationship with Anti-Slavery International
- partners - withdrawal of funding/support and ending of the relationship
- ALL: LEGAL ACTION.

_______________________________
(Print name)

_______________________________
(Job title / role)

_______________________________
(Signature)

_______________________________
(Date)