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Safeguarding Policy for Children and Young People

SECTION 1: INTRODUCTION

Anti-Slavery International works at local, national and international levels to eliminate all forms of slavery around the world. Many of the children with whom Anti-Slavery International works suffer serious harm and abuse and ensuring these children are protected is both an organisational and individual responsibility.

This policy is a statement of intent that demonstrates our commitment to safeguard children from harm and abuse. It provides a framework of principles, standards and guidelines on which to base individual and organisational practice. It is not possible for any policy to cover every eventuality and these guidelines are to be interpreted in the spirit of common sense with the best interests of the child as the primary consideration. The policy is not intended to replace the seeking of expert advice when necessary. If there is anything in the policy which isn’t clear, it is the responsibility of the individual to seek clarification from the Designated Safeguarding Officer, Senior Managers or the Nominated Trustee for Safeguarding.

The guidelines and procedures contained within this policy will be reviewed by the Designated Safeguarding Officer, Senior Managers, the Nominated Trustee for Safeguarding and other relevant staff on an annual basis. The revised policy will be approved by the Board of Trustees prior to implementation.

Guiding Principles

- Anti-Slavery International is committed to meeting the responsibilities set out in the UN Convention on the Rights of the Child to protect children from all forms of abuse, neglect, exploitation and violence
- The best interests of the child must be the paramount consideration in all actions and decisions
- Anti-Slavery International has a duty of care to the children who come into contact with us and we have a responsibility to ensure our staff and operations ‘do no harm’
- All children have equal rights to protection

SECTION 2: DEFINITIONS

Child
For the purposes of this policy, a “child” is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child.

Young People
Many of our programmes include work with young people aged 18-25 years. For simplicity, this policy refers to children, but all guidance and procedures contained within this policy should also be applied in our work with young people.

Representatives of Anti-Slavery International
This policy applies to all trustees, staff, volunteers, interns, consultants and others who visit programmes or have contact with children (either direct or indirect) in the name of Anti-Slavery International. For the purpose of this policy, the above-named individuals will be referred to as “representatives” of Anti-Slavery International.

Child Safeguarding and Child Protection
Child safeguarding can be defined as:

- Protecting children from harm and maltreatment
- Preventing harm which could result in the impairment of children's health or development
- Promoting the welfare of children and enabling them to achieve the best outcomes

Child protection is an essential component of safeguarding and refers to the actions taken to protect children who are at immediate risk of harm. Whilst this policy sets out clear response procedures which must be followed when harm or abuse is suspected, this Safeguarding policy also includes wider measures aimed at preventing harm, both direct and indirect, and promoting children’s wellbeing.

**Child Abuse & Harm to Children**

Child abuse, sometimes also referred to as ‘child maltreatment’, is defined as all forms of physical and/or emotional ill-treatment, sexual abuse, neglect, commercial or other exploitation resulting in actual or potential harm to the child’s health, survival, development or dignity.

Abuse and harm to children are closely related concepts. Abuse is simply harm which is so severe or persistent that it is deemed “significant” and is likely to have a lasting effect on the health or development of the child. This policy addresses all forms of harm to children, including harm which may be caused intentionally or unintentionally, and which may not reach the threshold of significant harm.

- **Physical Harm** – Actual or attempted physical injury of a child, inflicted intentionally or knowingly not prevented. This includes, but is not restricted to, punching, slapping, biting, burning, strangling, poisoning, drowning and smothering.
- **Sexual Harm** – The involvement of a child in sexual activity that he or she does not fully comprehend, or for which the child is not developmentally prepared for and is unable to give informed consent to. This includes direct sexual contact through kissing, touching and penetration as well as encouraging children to witness pornography or intercourse. It also includes the sexual exploitation of children through prostitution, trafficking and grooming with harmful intentions.
- **Emotional Harm** – The persistent failure to provide for the child’s basic emotional needs to such a severe extent that it is harmful to the emotional development of the child. This includes repeatedly ignoring or rejecting a child, causing the child to feel frightened and in danger, isolating the child from social contact and degrading and humiliating treatment.
- **Neglect** – The persistent failure to provide for the child’s essential needs, where there is the means to do so, to the extent that impairment to the child’s physical health and development is likely. This includes the failure to provide appropriate clothing, food or shelter; failure to adequately supervise a child and protect them from harm; failure to access appropriate medical care or treatment.
- **Exploitation** - The physical, mental or emotional abuse or neglect of a child for financial or other benefit. This includes commercial sexual exploitation, child trafficking, child marriage and child labour.

The above definitions reflect the sub-categories provided by the World Health Organisation and are based on a review of definitions in different countries across the world. However, it is important to note that definitions of abuse will vary from country to country and it is essential that the Child Protection Policies of individual partners identify the legal definitions of abuse in the country in which they operate as these will determine the parameters of protection that can be expected from the police and other welfare agencies.

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1 Adapted from the definition in Department for Education (2015) Working Together to Safeguard Children
**Direct Contact with Children**
Being in the physical presence of a child or children in the context of the organisation’s work, whether the contact is occasional or regular, short or long term.

**Indirect Contact with Children**
Having access to information on children in the context of the organisation’s work, such as children’s names, locations (addresses of individuals or projects), photographs and case studies.

**SECTION 3: ACCOUNTABILITY**

**Scope of the Policy**
All representatives of Anti-Slavery International have a responsibility to ensure the safety and well-being of the children that the organisation comes into contact with and to implement the policies and procedures contained within this document. This applies to:
- All trustees
- All staff and interns
- All volunteers
- All consultants and others who visit programmes in the name of Anti-Slavery International.

All representatives of Anti-Slavery International are required to read the Safeguarding Policy and sign a “Statement of Commitment” to adhere to the principles and procedures it contains (Appendix A: Statement of Commitment). Failure to comply with this policy could result in the immediate termination of contractual or other agreements with Anti-Slavery International.

**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 as quickly and efficiently as possible.

Anti-Slavery International has a Designated Safeguarding Officer (DSO) who is responsible for:
- Promoting awareness of the policy throughout the organisation.
- Monitoring implementation of the policy and reporting any issues or concerns to the Senior Management Team
- Maintaining clear records of any concerns that are reported and the actions taken to address these concerns
- Identifying training needs and developing or commissioning training where required
- Acting as a source of support and information for staff on safeguarding issues

The Senior Management Team (SMT) at Anti-Slavery International will support the DSO in ensuring that all safeguarding measures are implemented and adhered to and will also participate in an annual review of the Safeguarding Policy.

Specific responsibilities will be assumed by the Head of Programmes who will be responsible for:
- Receiving all concerns about conduct of staff and representatives of Anti-Slavery International that represent a breach of CSP or where harm or abuse of children or young people is suspected
- Receiving all concerns about conduct of staff and representatives of Anti-Slavery International that may be criminal in nature and require notification to external agencies
- Receiving all concerns about the conduct of representatives of partner organisations where harm or abuse of children or young people is suspected
• Receiving any concerns about the practice of the DSO

In all issues relating to child protection and safeguarding, the Head of Programmes will inform and consult with the CEO of Anti-Slavery International who will be responsible for:
• Acting as a link between the operational team and the Board of Trustees on any issues relating to safeguarding
• Acting as the main point of contact for safeguarding concerns if the Head of Programmes is unavailable
• Receiving any concerns about the practice of the Head of Programmes

In accordance with the UK Charity Commission Guidelines, the trustees of Anti-Slavery International must maintain an oversight of safeguarding within the organisation to ensure that those benefiting from, or working with, the charity are not harmed in any way through contact with it. A Nominated Trustee for Safeguarding will be identified whose functions include:
• To act as a point of contact within the Board for the DSO, Head of Programmes and CEO
• To receive and respond to any concerns which relate to the CEO
• To inform the Board of Trustees of any safeguarding concerns/investigations which may affect the reputation and standing of the organisation and provide advice on how these are to be managed
• To report any serious safeguarding incidents involving Anti-Slavery International representatives to the Charity Commission
• To oversee investigations into allegations of harm/abuse by representatives of Anti-Slavery International by the External Safeguarding Officer where this is not being conducted by other agencies

In addition, Anti-Slavery International will have access to an External Safeguarding Advisor whose key functions include:
• Providing impartial advice on any child protection or safeguarding issues
• Supporting the Nominated Trustee for Safeguarding in the conduct of investigations into allegations of harm/abuse by representatives of Anti-Slavery International where this is not being conducted by other agencies
• Where requested, supporting the DSO in the development or delivery of training
• Where requested, supporting Anti-Slavery International in the review of its Safeguarding policy

All staff, trustees and representatives will be made aware of the name and contact details of the DSO, the Nominated Trustee and the External Safeguarding Consultant (Appendix B: Key Contacts).

Work with Partners
Anti-Slavery International works with and through local partner organisations in a large number of countries. We recognise that effective child protection policies need to reflect the specific legal and cultural contexts in which our local partners are working. Whilst all our partners will be made aware of the provisions of the Anti-Slavery International Safeguarding Policy, primary importance will be placed on ensuring that partners develop their own child protection and safeguarding policies and procedures.

To achieve this, Anti-Slavery International will:
• Include a review of child protection within their due diligence process prior to developing formal partnerships with any organisation

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• Translate Anti-Slavery International’s Safeguarding Policy into local languages and include as an annex to the Partnership Agreement.

All partners will:
• Read the policy and commit to adhering to the principles contained within it as part of the Partnership Agreement
• Provide a copy of their own Child Protection Policy prior to signing the Partnership Agreement.
• Develop and implement the necessary child protection policies and procedures, where they do not exist; Anti-Slavery International will provide support to partners in this task.

Ensuring the protection of children is a continual process that must be monitored and reviewed on a regular basis. We recognise that some partners may have very strong safeguarding measures in place whilst others may require additional support to ensure safe practice. To achieve this, Anti-Slavery International will:

• Review the policies and procedures of partner organisations to ensure that all key aspects of safeguarding have been considered (Appendix C: Checklist for Reviewing Child Protection & Safeguarding Policies). This review will provide a guide to Programme Managers in their discussions with partners and in formulating plans to support and strengthen child protection amongst partners
• Include child protection within monitoring visits and engage in discussions with partners regarding any concerns or areas in which they would like support
• Where appropriate, include support and training for child protection within project budgets so that local specialists can be identified to improve the knowledge and skills of local teams

Where Anti-Slavery International facilitates coalitions of other organisations for advocacy purposes (e.g. the Anti-Trafficking Monitoring Group), members will be normally be required to have their own child protection or child safeguarding policies in place. In some circumstances, Anti-Slavery International funds coalitions of small grassroots organisations (e.g. Tanzanian Domestic Workers Coalition) and in these circumstances the coalition will develop a child protection policy which all members must sign and adhere to.

Where membership of a coalition results in funding relationship between Anti-Slavery International and a member organisation that involves implementing programmes or interventions with children and young people, the member will be considered a local partner and the requirements and support for partners described above must be applied.

SECTION 4: SAFE RECRUITMENT & TRAINING

Anti-Slavery International recognises that individuals who wish to cause harm to children may seek employment in organisations which enable access to children. 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 short term contracts. All representatives will be 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.

Employed Staff, Interns and Trustees
• All posts have job descriptions and key selection criteria to improve the likelihood of attracting the right person for the job
• All candidates must complete a CV and supporting letter in which they describe their relevant experience, including (where relevant) past experience working with children.
Applicants will be asked to fully declare whether they have any criminal convictions, spent or unspent. A false declaration that results in employment will render the person liable for dismissal without notice.

Candidates must explain any gaps in employment history

A conditional offer of employment will only be made upon receipt of two satisfactory written references. Acceptable references exclude family members and those who have known the applicant personally for under 2 years.

For staff or intern posts which involve travel to partner programmes or include direct contact with children, a DBS check will be completed. No staff members will be allowed to visit partner’s programmes until a satisfactory DBS is received.

Trustees do not ordinarily travel to visit projects or have direct or indirect access to children. If a trustee does travel to programmes or have indirect or direct access to children, then a DBS check must be completed. No trustee will be allowed to visit partner’s programmes until a satisfactory DBS is received.

In the case of non-UK citizens 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.

All staff, trustees and interns are required to read Anti-Slavery International’s Child Safeguarding Policy and sign a “Statement of Commitment” (Appendix A: Statement of Commitment) to adhere to it.

Upon becoming a trustee, individuals will sign Trustee eligibility declarations. A false declaration will result in dismissal. Trustees will be asked to reconfirm their eligibility to serve every year.

Staff will receive training every year when the policy is reviewed and updated.

Trustees will receive an annual briefing on safeguarding and be updated every time there is new Charity Commission Guidance.

Additional Training of the Trainer (ToT) training will be provided to the Programmes Team and Senior Members of staff who have regular contact with partners. The training aims to ensure that team members are able to support and advise partners in implementing child protection procedures and responding effectively to child protection concerns.

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

Volunteers

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

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

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

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4In this policy, a ‘completed’ check means a request issued and response received from the Disclosure and Barring Service.
All volunteers are required to read Anti-Slavery International’s Safeguarding Policy and sign a “Statement of Commitment” (Appendix A) to adhere to it.

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 will clearly stipulate that the organisation is under no obligation to offer a volunteer placement and refusal to do so will in no way affect the relationship with Anti-Slavery International.

Freelance & Contractors
On occasion, Anti-Slavery International will commission consultants or freelance staff to undertake work with partner organisations. This may include journalists, photographers, evaluators and trainers. In these circumstances, the following safeguards will be in place:

- All consultants and freelance staff will receive the “Summary of Safeguarding Policies and Procedures” as part of the Mission Security Protocol 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 or young people, a DBS check will be completed prior to departure
- For all freelance staff and contractors, a minimum of one reference will be obtained. Where the individual is expected to have extensive direct contact with children or young people, a second reference will be obtained which specifically explores their suitability to work with children and young people
- All consultants and freelance staff will receive a briefing prior to departure which includes expectations in regard to safeguarding
- Whilst on visits, consultants and freelance staff will always be accompanied by a member of staff from either Anti-Slavery International or the local partner when in direct contact with children or young people.
- Where it is not appropriate for a staff member to be present (e.g. where feedback about programme quality is being sought), the consultants/freelance staff will be accompanied by another responsible adult (e.g. teacher, parent etc.)

Under Cover Reporters
Our capacity to collect information and publish reports about human rights abuses is an essential aspect of Anti-Slavery International’s work. On occasion, this will require journalists and reporters to work undercover which will necessarily preclude adherence to certain aspects of the safeguarding policy:

- Undercover reporters will not be accompanied when in contact with children or young people
- Undercover reporters will not be able to obtain consent for the photos or stories that may later be used by Anti-Slavery International (See Section 6: 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 will:
• Prior to any undercover mission involving contact with children or young people, a meeting will be 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 young people must be mitigated as far as possible (Appendix D: Undercover Mission Approval)
• Wherever possible, two references will be gained for the reporter including requesting information on previous experience and conduct when in contact with children or young people
• A thorough briefing will be provided prior to the mission which includes clear expectations in regard to safeguarding and the reporting of concerns

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 will ultimately determine whether the visit may take place, when this may happen and what contact with children and young people is appropriate.

If a visit is agreed, the following safeguards will be put in place:
• The visitor will receive a copy of the “Summary of Safeguarding Policies and Procedures” which they will be asked to read and adhere to at all times
• The visitor will receive a briefing from the DSO or member of the programmes team prior to departure which includes expectations in regard to the safeguarding.
• The visitor will be accompanied by an employed staff from either Anti-Slavery International or the partner organisation at all times whilst with children or young people

Where Anti-Slavery International are notified of but do not directly facilitate a visit to a partner (e.g. a donor providing grants directly to the partner wishes to visit), the responsibility for ensuring all relevant safeguards are in place will rest with the partner organisation. However, in supporting partners to develop and strengthen their child protection procedures, Anti-Slavery International will stress the importance of implementing safeguards with all visitors irrespective of their status, the funding relationship or the individual’s celebrity.

Incomplete DBS and Police Checks
In very rare circumstances where a DBS or Police checks are incomplete due to time bound deadlines, Anti-Slavery International will ask for 2 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. Head of Programmes and CEO will agree how to proceed on a case by case basis, given the relevant particularities.

Ramifications of Misconduct
Where it has been found that representatives of Anti-Slavery International have breached any of the procedures or guidance contained in the Safeguarding Policy, immediate action will be taken. In serious cases this may include:
• 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
• Local Partners – withdrawal of funding/support and/or ending of relationship with Anti-Slavery International
Acts of a criminal nature will be referred to the police and/or Children’s Services and may result in a criminal investigation and conviction. Where this occurs, the police will also notify the DBS and the individual may be barred from future work with children.

SECTION 5: CODE OF CONDUCT

All representatives must abide by the following Code of Conduct, specifically designed to ensure that all representatives of Anti-Slavery International behave in a manner that is appropriate and protects children and young people. Adherence to the Code of Conduct also serves to protect staff, Trustees/Board Members and other representatives from allegations of inappropriate or harmful conduct. The guidelines are to be interpreted in the spirit of common sense, with the best interest of the child as the primary consideration.

Staff, Board members/trustees and other representatives of Anti-Slavery International have a responsibility to ensure that the Code of Conduct is adhered to at all times. Minor breaches of the code should be challenged directly with the individual concerned or, where this is not possible or appropriate, the issue should be raised with the individual’s direct line manager who will decide what further action is required. If concerns relate to the conduct of the CEO then the matter should be reported to the Nominated Trustee for Safeguarding. If the concern relates to a Trustee, it should be reported to the Chair of the Board of Trustees; if the concern relates to the Chair of the Board of Trustees then it should be reported to the Nominated Trustee for Safeguarding and the External Safeguarding Adviser, who will inform Children’s Services as necessary.

Any breach which places a child or young people at risk of harm or where there is a suspicion of abuse, must be reported in line with the reporting and response procedures contained Section 8 of this policy. *Any failure to report such breaches could result in disciplinary action.*

Trustees/Board Members are required to sign the Trustee Code of Conduct. Staff, Trustees/Board members are also required to sign the ASI Code of Conduct.

**General Professional Conduct**

- Be polite, considerate and provide an example of good conduct that you wish others to follow
- Never use language that is discriminatory on the grounds of race, culture, age, gender, disability, religion or sexuality
- 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”

**Preparation for Visits**

- When visiting partners, attempt to understand the local cultural and religious norms, particularly those related to contact between children and adults
- Ensure that you wear clothing that is appropriate to the local culture and religion
- Read the Partner’s Child Protection Policy prior to departure and ensure you know who to go to with any concerns
- Discuss contact with children and young people 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. Where it is not appropriate for a staff member to be present (e.g. where feedback
about programme quality is being sought), ensure you are accompanied by another responsible adult (e.g. teacher, parent etc)

- In addition trustees must be accompanied by an ASI staff member who has been DBS checked

**Interactions with Children**

- Always ensure that children and other beneficiaries know who you are and why you are visiting.
- Always treat children and other beneficiaries with respect and never act in a way which could shame, humiliate or degrade them
- Never show favouritism or spend excessive time with one child
- Avoid offering gifts to individual children and other beneficiaries. Gifts should only be given to the group as a whole and should be of minimal value
- Avoid being alone with children or placing yourself in any situation which could be misinterpreted.
- Never take a child in your car, to your hotel or to any other private spaces
- Never share personal details about yourself (your hotel (if possible), home address or contact details) or agree to connect with children or other beneficiaries on social media

**Physical Contact with Children**

- Always wait for the child 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 a child (including using physical restraint to contain behaviour unless absolutely necessary)
- Never give assistance in aspects of personal care (e.g. dressing, bathing etc.)
- Never engage in or allow sexually provocative games with children or behave in a manner which might be considered inappropriate or sexually provocative
- Never sleep in the same room or bed as a child with whom you are working
- Never develop physical/sexual relationships with children or other beneficiaries

**Use of Social Media**

- Never directly post images or stories about children 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.
- 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

**SECTION 6: COMMUNICATIONS GUIDELINES**

Case studies and photos are essential for raising awareness and combatting all forms of modern slavery. It must be recognised, however, that harm may be caused to children 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 will adhere to the following principles:

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

In balancing these considerations, Anti-Slavery International will:

a) **Photos**
- Wherever possible, images of children will not show the child’s face or any other detail which may serve to identify them (e.g. signs, landmarks).
- Where images contain identifying details, these should be edited out prior to use.
- Where images show a child’s face and can be linked to a specific location (e.g. a factory using child labour) additional safeguards will be put in place:
  - The partner organisation will be asked to complete a brief risk assessment and approve the use of the photo.
  - A consent form will be completed and signed by the child (see below).
  - Final approval will be sought from the DSO prior to use in external communications.

b) **Case Studies**
- Anti-Slavery International will only use first names and this name will be changed to protect the identity of the child. The only exception to this safeguard would be where the story is already in the public domain (e.g. a child nominated for an award).
- The exact location of the child will not be given. Information will be restricted to giving the country or region in which the child is living or working.
- No additional factors will be included which could be used to identify the child (e.g. names of schools, 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 will be put in place:
  - The partner organisation will be asked to complete a brief risk assessment and approve the use of the case study.
  - A consent form will be completed and signed by the child (see below).
  - Final approval will be sought from the DSO prior to use in external communications.

**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 will be followed:

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

1. When meeting children and other beneficiaries for the first time, all Anti-Slavery International representatives will explain who they are and why they are visiting.
2. Prior to taking any photo or case study information, all representatives will ask verbal permission from the child/beneficiary.
3. All representatives of Anti-Slavery International must respect the child/beneficiary’s wishes and if they decline to be interviewed or photographed no attempt should be made to change their mind.

All photos/case studies will be shared with the Communications Manager who will select photos/case studies to be used in media and communications. Where images or case studies identify a specific child, additional written consent must be obtained.

Consent from the Child
Formal consent must always be obtained from children who are identifiable in stories and images. However, Anti-Slavery International recognises that children’s ability to understand the implications of providing consent will vary. The child’s age must be considered but other factors such as the child’s living situation, any past experience of abuse and trauma, their education level as well as any disability will also impact their understanding. In recognition of this, Anti-Slavery International requires the child or young person’s consent to be supported by consent from a responsible adult.

In addition, the child’s level of literacy may mean they cannot read or understand the written consent. In such circumstance, a videotape of consent may be obtained using a smart phone or other device. This must include a recording of:
- The child’s name and age
- The explanation given to the child of how the image/case study may be used and who may see it
- Their right to refuse or withdraw consent
- Confirmation of the child’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 will contain approval for usage from the partner organisation.

Consent from a Responsible Adult
Whilst many organisations seek consent from parents or care givers, many of the children we work with are in a situation of slavery and the primary adult in their lives is also responsible for their exploitation. It would be inappropriate and potentially dangerous to seek consent from such an individual. In recognition of this reality, the additional consent will be provided by a representative of the partner organisation who has a duty of care towards that child.

Consent from the partner will actually be obtained prior to obtaining consent from the child as the partner must also complete a risk assessment which approves use of the image/case study. If the partner assesses that usage would place the child at risk, the image/case study will not be used and the child will not be asked for their consent.

The steps that must be followed are:
1. The Programme Manager will share the selected images/case studies with the partner organisation and ask them to complete some basic risk assessment information and approve the use of the image/case study
2. Where the partner approves usage, they will be asked to obtain written consent from the child
   The risk assessment and consent form are included on the same form (Appendix E: Consent for Use of Images and Personal Information)
3. Copies of consent forms will be saved with the selected images/case studies on the shared drive at Anti-Slavery International

Consent from the Child’s Parent
Many of the children we work with are either in a situation of slavery or have left their family home and have no direct contact with their parents or primary care givers (e.g. extended family). In these circumstances, it will not be possible to obtain parental consent and the reasons for omitting parental consent will be noted on the consent form. Where a parent or care-giver is available, their consent will also be obtained. Parents should also be provided with an explanation of how the image/case study may be used, who may see it and their right to refuse consent.

Selection of Images
In selecting images and case studies for use in communications, Anti-Slavery International will adhere to the following principles.

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

- **Accuracy**
  - The portrayal of children must not be manipulated or sensationalised in any way.
  - Images and stories should provide a balanced depiction of the child’s life and should avoid reinforcing negative stereo-types or victimising the child.
  - After 5 years, photos and case studies will be archived, in order to maintain a realistic view of our work and the children we support.
  - Photographs may be used that are more than 5 years old (e.g. to show historical impact of Anti-Slavery International or to show the importance of long-term interventions), but dates will be attached\(^5\) to the photos to show when they were obtained.

- **Privacy**
  - All photos/case studies which are selected for use will be stored on the shared drive and permission restricted to employed staff.
  - Access to other individuals will be kept to an absolute minimum and will require access permission.
  - All photos/case studies which are not of publishable quality and are not selected for use will be deleted.
  - Photos or case studies which are of publishable quality but are not selected for use will be saved in an archive folder and permission restricted to employed staff. **Consent must be obtained before use of these photos or case studies.**

Case Studies & Photos as Evidence
Ensuring prosecutions is a key to ending slavery. 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 of children to the police, a meeting will be held.

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\(^5\) 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 will be provided.
between the CEO, DSO and a Senior Representative of the partner organisation to ensure that disclosing information will not put the child at additional risk. In circumstances where disclosure is likely to place the child, Anti-Slavery International and the partner organisation will 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 will be sought where necessary.

Implementation of Communication Guidelines
The above guidelines were developed as part of the policy review in January 2017. They must be applied in all communications from this date.

We recognise that images and case studies obtained prior to this date may not have the required consent stored on file. Anti-Slavery International will gradually review all external communications materials to ensure that they are compliant with the above guidelines.

SECTION 7: INTERVIEWING CHILDREN

Interviewing children for case studies and other reports is essential to raise awareness of slavery and influence decision makers. Whilst case studies can have a positive impact, recounting stories of slavery or past abuse can be distressing for the child and every attempt must be made to ensure that interviewing do not re-traumatise the child in anyway.

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

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 child 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 the child and without the interviewer being present. This will enable the child to feel more comfortable refusing to participate if they so wish. The interviewer should review the child’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 child is familiar with. Wherever possible, the child 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 child 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 child must be aware of and consent given for these subjects being raised. The interviewer needs to pay close attention to the child’s body language and responses and offer to stop the interview if the child appears to be uncomfortable or upset at any point.
- **Gender:** When arranging an interview, consideration must be given to the needs different of children and whether the gender of the interviewer will affect how comfortable the child feels in
responding. Wherever possible, the child 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 child 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.

**During the interview:**

- **Respect Agreements**: It is not appropriate for the interviewer to delve into new areas that the child
has not agreed to talk about. This is a breach of trust and may be harmful to the child.
- **Body language**: Try and ensure that your body language helps to put the child at ease – position
yourself on the same level to address power imbalances; make eye contact but don’t stare; smile.
Also be aware of the child’s 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 the child
looks 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.
- **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 children’s responses or impose your
values and understanding of the world on children. 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 child 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 other children. Outline the measures that will be 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.

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**SECTION 8: REPORTING & RESPONSE PROCEDURES**

Anti-Slavery International works through partner organisations and 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, representatives of Anti-Slavery International are
obligated to report any concerns about alleged or suspected harm to Head of Programmes or CEO
immediately. In the event that the concerns relate to the CEO, the report must be made to the
Nominated Trustee for Safeguarding, in the event of the concerns relating to a Trustee/Board Member
the Chair of the Board Trustees should be alerted as well as the Nominated Trustee for Safeguarding.
Concerns about the Chair are reported to the Nominated Trustee for Safeguarding and the External
Safeguarding Adviser, who will inform Children’s Services where relevant.

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
F: Cause for Concern Form)

In addressing the concern, representatives of Anti-Slavery International will adhere to the following
principles:

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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.
• **The best interest of the child** – where any concern is raised, ensuring the safety and well-being of the child must be the primary consideration

• **Equal right to protection** – The procedures outlined below relate to harm caused to any child regardless of whether they are a beneficiary of Anti-Slavery International or our partner organisations, and irrespective of age, religion, gender, race or any other factor.

• **Organisational Responsibility** – the responsibility for decisions and actions rests with Anti-Slavery International as an organisation and not with any individual staff member. Staff and representatives must not act in isolation but must consult with the designated individuals stipulated within this policy

• **Confidentiality** – details of the concern should be shared with the minimum number of people necessary in order to ensure the safety of the child. Records of child protection concerns will be kept securely and access limited to the CEO, Head of Programmes and DSO. Access by other individuals will require permission from the DSO.

• **Respect for local laws and customs** – Anti-Slavery International works in diverse contexts and suspected harm to children must be responded to and investigated in the context of local laws and customs

• **Defensible Decision Making** - It is not possible for any policy to cover every eventuality. In all circumstances, staff and representatives are expected to consult in order that they may make defensible decisions that are appropriate and safeguard the welfare of the child.

Disclosures from Children

Children 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 a child 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 child says and re-assure them that you will take what they are saying seriously. Never minimise a child’s concerns

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

• Do not promise secrecy to the child. Explain that you have to share the information they have provided to keep them and other children safe but that you will listen to their wishes about who is told and when this happens

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

• Ask open questions and be careful to not influence what they are saying by asking leading questions.

• Clarify your understanding throughout so that you will be able to later report the incident correctly. However, try not to repeat the same questions to the child, as this gives the child the impression that they did not give correct information the first time and that they are not fully believed.

• Ask the child what would help them feel safe. Include this within any later discussions where protective actions are decided.

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

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

*CBA Procedure A: Alleged harm or abuse of a child or young person by a partner organisation’s representative, observed by or reported to a representative of Anti-Slavery International*
1. If you observe or receive reports that a representative of a partner organisation is behaving in a way that is or is likely to cause harm to a child, your first responsibility is to ensure the safety of the child. 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 child before all other actions and take all reasonable action possible to ensure their well-being.

2. The concern must be reported immediately to the Head of Programmes at Anti-Slavery International. If they are unavailable, the matter should be reported to the CEO or other available member of the Senior Management Team. The Head of Programmes will provide guidance in regard to raising the issue with the Partner and any expectations Anti-Slavery International may have in regard to the response required. Where necessary, the Head of Programmes may choose to consult with the External Safeguarding Advisor for guidance on how to manage and respond to the situation.

3. The Partner organisation should then be informed immediately and decisions must be taken in regards to:
   - Actions to ensure the safety and well-being of the child
   - Actions to prevent further harm being caused to other children (including, in the case of employed staff, whether to suspend the person from duties)
   - How the matter will be investigated and whether the case needs to be reported to the police or other authorities

   It is important that the Partner takes lead responsibility in deciding the actions taken as they will be more familiar with the legal and social context in which the concern has arisen.

4. The decisions should be reported back to the Head of Programmes and a Cause for Concern form (Appendix F) completed within 24 hours. This should be sent to the Head of Programmes...
who will share it with the CEO and DSO. The DSO is responsible for updating the form with all subsequent actions.

5. In serious or criminal cases, the Nominated Trustee for Safeguarding should also be informed and consideration given to whether the concern is serious enough to warrant funding to be frozen pending further investigation.

6. The Partner will follow up agreed actions and will be asked to provide written confirmation of the actions taken within 1 week of the concern being reported, or sooner if appropriate. This may include referring the case to relevant authorities and/or services which will be determined on a case by case basis with appropriate advice taken from individuals with specialist, up-to-date knowledge of the context.

7. The Head of Programmes or the Programme Manager will remain in contact with the Partner until the matter has been investigated and satisfactorily resolved. In some cases, it may be appropriate for the Head of Programmes or the Programme Manager to visit the partner to support this process.

8. If Anti-Slavery International is concerned that the partner is failing or refusing to address a child protection or safeguarding concern, the CEO will raise this with the Partner’s Director or Board of Trustees, where appropriate. If this is insufficient to resolve the issue, Anti-Slavery International may reconsider the appropriateness of continuing the partnership.
Procedure B: Alleged harm caused, or likely to be caused to a child or young person by a representative of Anti-Slavery International whilst overseas

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 child, your first responsibility is to ensure the safety of the child. 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 child before all other actions and take all reasonable action possible to ensure their well-being.

   The concern must be reported immediately to the Head of Programmes at Anti-Slavery International. If they are unavailable, the matter should be reported to the CEO or other available member of the Senior Management Team. If the concern relates to the CEO, it should be raised with the Nominated Trustee for Safeguarding. If the concern relates to a Trustee, it should be reported to the Chair of the Board of Trustees. Concerns about the Chair are reported to the Nominated Trustee for Safeguarding and the External Safeguarding Adviser, who will inform Children’s Services where relevant.

2. Where necessary, the External Safeguarding Advisor may be contacted for guidance on how to manage and respond to the situation.

3. In the case of a staff member or other representative (excluding trustees) and where the
concern represents a minor breach of the Safeguarding Policy, the matter will normally be
delegated to the Line Manager who must keep the Head of Programmes informed of all actions
taken.

4. In the case of a staff member or other representative (excluding trustees) and where actual
harm or abuse to a child is suspected, the Head of Programmes must inform the CEO and a
decision taken regarding whether to suspend the individual from duties. In most cases, it is
expected that the individual will be suspended on full pay pending an investigation. This is not
a presumption of guilt but a measure to protect the individual and all others involved.

5. The Nominated Trustee for Safeguarding should be informed immediately.

6. The Head of Programmes will notify the CEO of the Partner organisation and decisions taken
in regard to:
   - Actions to ensure the safety and well-being of the child
   - Actions to prevent further harm being caused to other children
   - How the matter will be investigated and whether the case needs to be reported to the police
     or other authorities

The nature of the investigation will depend on the nature of the concerns, local procedures and
legal obligations. Given that the incident occurred outside the UK, it is likely that the partner
organisation will take the lead in organising any investigation but all actions will be planned and
executed in close collaboration with Anti-Slavery International. Where necessary, Anti-Slavery
International may commission external expertise to support this process.

7. Following the discussion with the partner organisation, the CEO will contact the individual who
is subject to the allegation. They will be given brief details of the concerns that have been raised
and how the matter is going to be investigated.

In most cases, arrangements should be made for the individual return to the UK but, where a
criminal act is alleged, they may be required to remain in country whilst the police investigation
is completed. The CEO will act as the point of contact for the suspended individual. Contact with
other staff or those associated with the organisation will not be permitted. All access to
organisational data will be blocked during the course of the investigation.

As the individual is not permitted to contact their union representatives at Anti-Slavery
International, they should instead contact Unison directly for union-related support and
guidance. While union representatives are generally permitted contact under these
circumstances, given the size of this organisation, the potential for conflict of interest is
considered to be too great. Individuals can also contact FACT, a support organisation for
innocent victims of wrongful allegations of abuse in a work setting (0843 2892 016).

8. All actions must be recorded on a Cause for Concern form (Appendix F) within 24 hours. This
should be completed by the Head of Programmes who will be responsible for updating the form
with all subsequent actions. The record will be maintained on the individual’s personnel file and
access limited to the CEO and Head of Programmes.

9. The Head of Programmes will remain in close contact with the partner organisation and all other
relevant agencies throughout the investigation process. Anti-Slavery International will seek to
ensure that the investigation is thorough but also that it is completed as promptly as possible.

10. Where there are reasonable grounds to suspect that harm or abuse has occurred and the
individual is a UK resident, the matter must also be reported to the Local Authority Designated
Officer (LADO) in the area where the individual lives in the UK. The LADO will advise whether
Children’s Services or the police will need to take action in regard to the allegation and whether
any further investigation is required. They will also provide advice regarding referrals to the
police and Disclosure & Barring Service (DBS).
If a criminal or Children’s Services investigation is to be conducted, Anti-Slavery International will participate fully in this process.

11. The Nominated Trustee for Safeguarding must report the incident to the Charity Commission. Although the Charity Commission is unlikely to take action, they will expect evidence that the matter has been dealt with responsibly and all relevant agencies informed.

In addition to maintaining the confidentiality of the child, the confidentiality of the individual who is subject to the allegation must also be maintained. Staff and trustees will not be informed that the individual is suspended but will simply be told that they are unavailable for work. This aims to prevent any difficulties should the allegation be proven to be unfounded.

Although it is important that the DSO is able to maintain an overview of protection cases and safeguarding issues within the organisation, sharing details of allegations against colleagues or managers could place the DSO and the individual concern in a difficult or compromising situation. For these reasons, the DSO will not be party to discussions regarding employed members of staff, interns or trustees.

12. Where there is a concern that a trustee may have breached the Safeguarding Policy in any way at all the matter will be reported directly to the Chair of the Board of Trustees who will take a decision regarding whether to suspend the individual from duties. In most cases, it is expected that the individual will be suspended pending an investigation. Where actual harm or abuse to a child is suspected, the Chair will always suspend the individual from duties. In the event of a suspension and/or investigation the individual trustee will be instructed to not contact other trustees or staff members. This is not a presumption of guilt but a measure to protect the individual and all others involved. The Chair may consult the external safeguarding adviser as appropriate.

The Chair will then follow the procedure outlined in steps 5-11 above, in place of both the CEO and Head of Programmes. The Chair will involve the CEO only if it is practically required to ensure the steps are followed.

14. Where there is a concern that the Chair of the Board may have breached the Safeguarding Policy in any way at all, the matter will be reported to the external safeguarding adviser and the Nominated Trustee for Safeguarding who will agree next steps. In most cases it is expected that the Chair will be suspended pending an investigation. Where actual harm or abuse to a child is suspected the Chair will always be suspended. In the event of a suspension and/or investigation the Chair will be instructed to not contact other trustees or staff members. This is not a presumption of guilt but a measure to protect the individual and all others involved.

15. The Nominated Trustee for Safeguarding will work with the external safeguarding adviser to follow the procedure outlined in steps 5-11 above, assuming the functions of Head of Programmes and CEO between them.

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7 The Charity Commission must be informed of:

- Any incident where the beneficiaries of your charity have been or are being abused or mistreated while under the care of your charity or by someone connected with your charity such as a trustee, member of staff or volunteers
- Any incident where someone has been abused or mistreated & this is connected with the activities of the charity
- Any allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place
- Where there are grounds to suspect that such an incident may have occurred

Procedure C: Alleged harm caused, or likely to be caused to a child or young person by a representative of Anti-Slavery International whilst in the UK

Although Anti-Slavery International has limited contact with children in the UK within the course of its work, events may be held which involve children or allegations may come to light regarding the abuse or harm of children 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 trustee or other representative of Anti-Slavery International is behaving in a way that is or is likely to cause harm to a child, your first responsibility is to ensure the safety of the child. 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 child before all other actions and take all reasonable action possible to ensure their well-being.

2. The concern must be reported immediately to the Head of Programmes at Anti-Slavery International. If they are unavailable, the matter should be reported to the CEO or other available member of the Senior Management Team. If the concern relates to the CEO, it should be raised with the Nominated Trustee for Safeguarding. If the concern relates to a Trustee, it should be reported to the Chair of the Board of Trustees. Concerns about the Chair are reported to the Nominated Trustee for Safeguarding and the External Safeguarding Advisor.
Adviser, who will inform Children’s Services where relevant.

3. Where necessary, the External Safeguarding Advisor may be contacted for guidance on how to manage and respond to the situation.

4. In the case of a staff member, or other representative (excluding trustees/Board Members) where the concern represents a minor breach of the Safeguarding Policy, the matter will normally be delegated to the Line Manager who must keep the Head of Programmes informed of all actions taken.

5. In the case of a staff member, or other representative (excluding Trustees/Board Members) and actual harm or abuse to a child is suspected, the Head of Programmes must inform the CEO and a decision taken regarding whether to suspend the individual from duties. In most cases, it is expected that the individual will be suspended on full pay pending an investigation. This is not a presumption of guilt but a measure to protect the individual and all others involved.

6. The Nominated Trustee for Safeguarding should be informed immediately.

7. The CEO will contact the individual who is subject to the allegation. They will be given brief details of the concerns that have been raised and whether the matter will be referred to any external agencies. The CEO will act as the point of contact for the suspended individual. Contact with other staff or those associated with the organisation will not be permitted. All access to organisational data will be blocked during the course of the investigation.

8. As the individual is not permitted to contact their union representatives at Anti-Slavery International, they should instead contact Unison directly for union-related support and guidance. While union representatives are generally permitted contact under these circumstances, given the size of this organisation, the potential for conflict of interest is considered to be too great.

9. Individuals can also contact FACT, a support organisation for innocent victims of wrongful allegations of abuse in a work setting (0843 2892 016).

10. Where there are reasonable grounds to suspect that harm or abuse has occurred, the matter must be reported to the Local Authority Designated Officer (LADO) in the area where the child lives. The LADO will advise whether Children’s Services or the police will need to take action in regard to the allegation and whether any further investigation is required. They will also provide advice regarding referrals to the police and Disclosure & Barring Service (DBS).

If a criminal or Children’s Services investigation is to be conducted, Anti-Slavery International will participate fully in this process.

11. Where the concern is not deemed sufficiently serious to warrant an investigation by the police or Children’s Services, Anti-Slavery International will conduct their own investigation into the incident. This will be conducted by the Nominated Trustee for Safeguarding in collaboration with the External Safeguarding Advisor.

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

13. An investigation report will be produced and submitted to the Chair of the Board of Trustees who will decide further action to be taken (See Ramifications of Misconduct in Section 4).

14. Throughout this process, all actions must be recorded on a Cause for Concern form (Appendix

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Guidance on how to conduct an investigation is provided in the guidance ‘Management Child Safeguarding Allegations’ produced by Keeping Children Safe. Available [here](#)
F). This should be completed by the Head of Programmes who will be responsible for updating the form with all subsequent actions. The record will be maintained on the individual's personnel file and access limited to the CEO and Head of Programmes.

15. The Nominated Trustee for Safeguarding must report the incident to the Charity Commission. For further details, see Procedure B.

16. The confidentiality of the individual who is subject to the allegation must be maintained throughout the process. For further details, see Procedure B.

17. Where there is a concern that a trustee may have breached the Safeguarding Policy in any way at all, the matter will be reported directly to the Chair of the Board of Trustees who will take a decision regarding whether to suspend the individual from duties. In most cases, it is expected that the individual will be suspended pending an investigation. Where actual harm or abuse to a child is suspected, the Chair will always suspend the individual from duties. In the event of a suspension and/or investigation the individual trustee will be instructed to not contact other trustees or staff members. This is not a presumption of guilt but a measure to protect the individual and all others involved. The Chair may consult the external safeguarding adviser as appropriate.

18. The Chair will then follow the procedure outlined in steps 6-16 above (with the exception of steps 8 and 13) acting in place of both the CEO and Head of Programmes. The Chair will involve the CEO only if it is practically required to ensure the steps are followed.

19. An investigation report will be produced and submitted to the Officers of the Board of Trustees who will decide further action to be taken.

20. Where there is a concern that the Chair of the Board may have breached the Safeguarding Policy in any way at all, the matter will be reported to the external safeguarding adviser and the Nominated Trustee for Safeguarding who will agree next steps. In most cases it is expected that the Chair will be suspended pending an investigation. Where actual harm or abuse to a child is suspected the Chair will always be suspended. In the event of a suspension and/or investigation the Chair will be instructed to not contact other trustees or staff members. This is not a presumption of guilt but a measure to protect the individual and all others involved.

21. The Nominated Trustee for Safeguarding will work with the external safeguarding adviser to follow the procedure outlined in steps 6-16 above (with the exceptions of steps 8 and 13), assuming the functions of Head of Programmes and CEO between them.

22. The Nominated Trustee for Safeguarding and the safeguarding adviser will only involve the CEO if required to ensure the steps are practically followed.

23. The Nominated Trustee for Safeguarding and external safeguarding adviser will present their report to the Vice Chair and Treasurer who will decide further action to be taken.
Procedure D: Abuse to children occurring within the community and perpetrated by individuals not associated with either Anti-Slavery International or partner organisations

Through their work, representatives of Anti-Slavery International may also encounter abuse of children 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 children regardless of their relationship with the work of Anti-Slavery International.

1. If you observe or receive reports that a child is suffering or likely to suffer harm or abuse, your first responsibility is to ensure the safety of the child. 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 child before all other actions and take all reasonable action possible to ensure their well-being.

2. The concern must be reported immediately to the Head of Programmes at Anti-Slavery International. If they are unavailable, the matter should be reported to the CEO or other available member of the Senior Management Team. The Head of Programmes will provide guidance to the actions to be taken.

Where necessary, the Head of Programmes may choose to consult with the External Safeguarding Advisor for guidance on how to manage and respond to the situation.

3. The Partner organisation should then be informed immediately in order to identify the most appropriate agency to follow up the concerns. In the majority of instances, this will involve a referral to the local welfare agencies or to the police. However, in some circumstances this may place the child at additional risk and alternative community-based protections may need to be sought.

4. A Cause for Concern form (Appendix F) completed within 24 hours. This should be sent to the Head of Programmes who will share it with the CEO and DSO. The DSO is responsible for updating the form with all subsequent actions.

5. The Partner will be asked to monitor the case and provide written feedback regarding actions and outcomes.
**Organisational Learning**

It is important that any cases of harm or abuse are used to inform and develop the 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 will review the management of cases and use the learning and knowledge gained to inform future policies and procedures as well as the practice of our staff, representatives and partners.

**SECTION 9: INVOLVING CHILDREN IN ADVOCACY**

Anti-Slavery International recognises the agency of children and their right to be listened to in matters which affect them. One area in which children may become actively involved in our work is in advocacy aimed at ending slavery. Although Anti-Slavery International believes that children have a valuable contribution to make to this process, we also recognise that involving children in advocacy could expose them to additional risks of harm such as:

- Individuals may exact retribution for the child speaking out.
- Children may be stigmatised by individuals in their communities who do not agree with their views
- Children 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 children in advocacy will always form part of wider project planning in which the risks and benefits of the strategy are carefully considered. Where advocacy involving children is deemed to be important, a full assessment of the risks will be conducted prior to initiating activities to ensure that children are safe and protected. Consent for involvement will also be obtained from the child and, where possible, their parent or care giver.

Prior to becoming involved in any advocacy activity, children will be 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

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

**Children attending International Events**

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

Where Anti-Slavery International arranges for a child to attend an international event, they must:

- Ensure the child is accompanied by a chaperone at all times
- Ideally the chaperone should be a family member or an employee of the partner organisation. If the chaperone is neither a family member or employee, the relevant background checks and references must be obtained
- The chaperone should receive a briefing on safeguarding and the expectations of their role prior to departure
- The chaperone should be provided with contact details for a 24-hour emergency person within Anti-Slavery International for the duration of the event as well as external emergency contact details (e.g. police, medical services)
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

_____________________________
(Print name)

_____________________________
(Job title / role)

_____________________________
(Signature)

_____________________________
(Date)
### APPENDIX C: CHECKLIST FOR REVIEWING CHILD PROTECTION & SAFEGUARDING POLICIES

#### BASIC DETAILS

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

#### CRITERIA

<table>
<thead>
<tr>
<th>A</th>
<th>FULLY IN PLACE</th>
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<tbody>
<tr>
<td>B</td>
<td>PARTIALLY IN PLACE</td>
</tr>
<tr>
<td>C</td>
<td>NOT IN PLACE</td>
</tr>
</tbody>
</table>

#### BASIC PRINCIPLES

- The organisation has a written CPP
- The policy reflects the principles of UNCRC (Non-discrimination; Best Interests of the Child)

#### DEFINITIONS

- The policy includes a definition of the child (and young people)
- 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 CP issues (e.g. CPO)
- 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
- The policy includes a Code of Conduct outlining appropriate
<table>
<thead>
<tr>
<th>The policy includes information on sanctions for misconduct</th>
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**REPORTING PROCEDURES**

<table>
<thead>
<tr>
<th>The policy includes a clear procedure for reporting concerns</th>
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<tbody>
<tr>
<td>The procedure provides information on what action should be taken, when and by whom</td>
</tr>
<tr>
<td>The procedure includes guidance on how and where to document concerns</td>
</tr>
<tr>
<td>The policy includes guidance on confidentiality</td>
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</table>

**MEDIA & COMMUNICATIONS**

<table>
<thead>
<tr>
<th>The policy includes guidance on the use of photos and case studies</th>
</tr>
</thead>
<tbody>
<tr>
<td>The policy includes a procedure for gaining informed consent for the use of images &amp; personal information</td>
</tr>
<tr>
<td>The policy includes guidance on the use of information technology &amp; social media</td>
</tr>
</tbody>
</table>

**DISSEMINATION & REVIEW**

<table>
<thead>
<tr>
<th>The policy is endorsed by the relevant management committee</th>
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<tbody>
<tr>
<td>The policy is translated into local languages &amp; shared widely</td>
</tr>
<tr>
<td>A simplified version of the policy is available or shared with children</td>
</tr>
<tr>
<td>The policy is reviewed at least every 3 years</td>
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</table>
## Section A: Details of Mission

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

Summary of Mission:

## Section B: Details of Investigator

<table>
<thead>
<tr>
<th>Name:</th>
<th>Has this investigator undertaken previous missions for Anti-Slavery International?</th>
<th>Yes/No</th>
<th>If yes, provide brief details including details of any contact with children or young person?</th>
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</table>

Have references been obtained regarding this investigator? | Yes/No | If yes, provide brief details including details of any contact with children and young person? If no, please explain why references have not been obtained & how this will be addressed.

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## Section C: Risk-Benefit Analysis

How will this mission contribute to the wider protection and well-being of children? (Benefit)

<table>
<thead>
<tr>
<th>How might this mission expose children to additional risks? (Risks)</th>
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</table>

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

<table>
<thead>
<tr>
<th>Names &amp; Role of Anti-Slavery International representative participating in approval meeting:</th>
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<table>
<thead>
<tr>
<th>Signature (CEO):</th>
<th>Date:</th>
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</table>
## Section A: Approval from Partner Organisation

<table>
<thead>
<tr>
<th>Name of Child:</th>
<th>Age:</th>
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<tbody>
<tr>
<td>Name of Partner:</td>
<td></td>
</tr>
</tbody>
</table>

**Will use of this image or case study expose the child 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: ___________________________  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:

Signed: ___________________________  Date: ___________________________

Print Name: ___________________________  Role in Organisation: ___________________________
Section C: Children’s Consent
Someone has explained to me that Anti-Slavery International is an organisation that tries to help children all over world.

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 children and to help to make things better.

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.

I know I can change my mind at any time and ask them to stop and not use my photos or any information about me.

Signed:................................................................. Date:.............................

Section D: Parental Consent
If a parent/care giver available to provide consent Yes / No

If no, please provide an explanation:

Where a parent/care giver is available to provide consent please complete the section below:

I give permission for Anti-Slavery International to use a photo story about my child (delete as appropriate) to help people in other countries understand the problems children face.

Signed: Date:

Print Name: Relationship to Child:
# APPENDIX F: CAUSE FOR CONCERN FORM

**Cause for Concern Form**

<table>
<thead>
<tr>
<th>Details of Report</th>
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<tbody>
<tr>
<td>Concern Reported By</td>
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<tr>
<td>Relationship between who reported the concern and who they reported it to:</td>
</tr>
<tr>
<td>Date</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Details of Concern</th>
</tr>
</thead>
<tbody>
<tr>
<td>Was the concern:</td>
</tr>
<tr>
<td>☐ Observed</td>
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<tr>
<td>If reported by a third party, please state their name &amp; relationship to the child:</td>
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<tr>
<td>………………………………………………………………………………………………………………………………</td>
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</table>

<table>
<thead>
<tr>
<th>Details of Child/Children at risk:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
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<table>
<thead>
<tr>
<th>DETAILS OF Concern (What happened; When; Where; Who was involved)</th>
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<table>
<thead>
<tr>
<th>Record of Decisions &amp; Actions Taken</th>
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<tbody>
<tr>
<td>Date</td>
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<th>Closure of Concern</th>
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<tr>
<td>Final Outcome:</td>
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