



Anti-Slavery International Safeguarding Policy for Children, Young People and Vulnerable Adults

REVISIONS

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1. What is safeguarding?

In the UK, safeguarding means taking all reasonable steps in protecting people's health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.¹

In the INGO sector, we understand it to mean protecting people, including children and vulnerable adults, from harm that arises from coming into face-to-face, virtual, digital, and/or phone contact with our staff, or programmes.²

1.1 Anti-Slavery International's Representatives include: board members/trustees, staff, volunteers, interns, consultants, and others who visit programmes and/or have contact with children and vulnerable adults (both direct and/or indirect) in the name of Anti-Slavery International. This includes associated personnel whilst engaged with work or visits related to Anti-Slavery International, including but not limited to consultants, volunteers, contractors, programme visitors including journalists, celebrities, and politicians. For the purposes of this policy, the above-named individuals are referred to as 'Representatives' of Anti-Slavery International.

All Anti-Slavery International Representatives are responsible for safeguarding, and their actions must be consistent with the principles outlined below, as well as with those laid out in the Anti-Slavery International Code of Conduct.

1.2 The following principles³ underpin all safeguarding practices at Anti-Slavery International:

- Everyone has equal rights to protection from harm.
- Anti-Slavery International and its implementing partners (partners we have a sub-contractual relationship with to implement a piece of work) create and maintain a working environment that allows beneficiaries to be safe from harm and to feel safe to fully participate.
- The organisation has a duty of care to children, young people, and vulnerable adults, with whom we work, and those who come into face-to-face, virtual, digital, and/or phone contact with our work and operations.
- All Representatives are responsible for safeguarding children, young people, and vulnerable adults.
- The organisation has a responsibility to set safeguarding standards for partner organisations and, where necessary, support them to meet those standards.
- The best interests of the child, young person and vulnerable adult must be the paramount consideration when taking actions to safeguard them.

1.3 Safeguarding children and young people can be defined as:

- Preventing harm or abuse of children and young people that arises because of Anti-Slavery International's representatives, programmes, or operations.
- Protecting children and young people from maltreatment in the wider community by raising, reporting, and referring concerns to appropriate authorities.
- Taking action to enable all children and young people to have the best outcomes from their involvement with Anti-Slavery International.

¹<https://ngosafety.org/safeguardingpolicy#:~:text=Safeguarding%20means%20taking%20all%20reasonable,appropriately%20when%20harm%20does%20occur.>

² <https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms>

³https://www.keepingchildrensafe.global/accountability/#General_principles

1.4 Safeguarding vulnerable adults can be defined as:

- Preventing harm or abuse of vulnerable adults that arises because of Anti-Slavery International's representatives, programmes, or operations. *In the context of our work due to issues of poverty, marginalisation and relative lack of power, most people with whom we work in national and international programmes can be classed as vulnerable.*
- Working together to identify, prevent and stop both the risks and experiences of abuse or neglect. This includes raising, reporting, and referring concerns to appropriate authorities where relevant.
- Ensuring that our actions concerning the wellbeing of vulnerable adults is guided, where appropriate, by their views, wishes, feelings and beliefs.

2. Purpose of Policy

The purpose of this policy is to protect people, particularly children, young people and vulnerable adults and beneficiaries of assistance, from any harm that may be caused due to their contact with Anti-Slavery International. This includes harm arising from:

- The conduct of representatives of Anti-Slavery International
- The design and implementation of Anti-Slavery International programmes and activities

This policy applies to all representatives (outlined above) of Anti-Slavery International. All Representatives are required to read the Safeguarding Policy and sign our Statement of Commitment to adhere to the principles and procedures it contains. Failure to comply with this policy could result in the immediate termination of contractual or other agreements with Anti-Slavery International.

Anti-Slavery International works at local, national, and international levels to eliminate all forms of slavery around the world. Many of the children and vulnerable adults with whom Anti-Slavery International works, have suffered serious harm and abuse. Ensuring that Anti-Slavery International's beneficiaries are protected is both an organisational and individual responsibility.

This policy is a statement of intent that demonstrates our commitment to safeguard children, young people, and vulnerable adults 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, young person, or vulnerable adult as the primary consideration. This policy is not intended to replace the seeking of expert advice when necessary.

2.1 Accountability

Who is accountable?

Whilst safeguarding is the responsibility of every representative of Anti-Slavery International, there are specific roles with leadership and professional responsibility.⁴

Board of Trustees

Leadership responsibility for safeguarding lies with the Anti-Slavery International Board of Trustees. Trustees should promote a positive and open working environment which recognises the implications of power and diversity in creating a culture for safeguarding. They should ensure that the organisation has appropriate safeguarding policies and procedures in place and should encourage all staff to report concerns confidently. The Trustees must identify potential risks and ensure that they monitor how the organisation is creating a culture for safeguarding and must also review ongoing compliance with international standards.⁵

Actions related to safeguarding may be delegated, but responsibility remains with the trustees. If matters are not managed adequately, in the opinion of the Charity Commission, it may be deemed to be misconduct/mismanagement and/or a breach of trustee duties and/or a breach of funding requirements. Considerations will likely include whether the organisation followed suitable policies and procedures; adequate due diligence was carried out; trustees had adequate oversight; appropriate remedial action was taken; incidents were reported to authorities, where appropriate; the Commission were informed through Serious Incident Reporting.⁶

The Board of Trustees should also appoint a lead Safeguarding Trustee, who is the board's named expert on safeguarding. Although the Safeguarding Trustee may take the lead to support, advise, and guide the board and staff members on safeguarding issues, safeguarding remains a shared responsibility of all trustees. The Safeguarding Trustee should meet with the Safeguarding Manager as necessary to discuss case management and should act as an independent resource when dealing with safeguarding reports. Staff and representatives may also approach the Safeguarding Trustee, in the event that the Chief Executive Officer, Senior Management Team Safeguarding Lead and/or Safeguarding Manager are implicated, or it is reasonably suspected that they are not managing an incident appropriately.

If required, the Safeguarding Trustee with the support of all other trustees, is responsible for making a report to the Charity Commission if there is a serious safeguarding incident to report. Failure to report a serious incident may be deemed as mismanagement by the Charity Commission. This in turn could initiate regulatory action if the case has subsequently resulted in further harm or abuse. They are also responsible for ensuring other statutory bodies are informed as required, including the police. The Safeguarding Trustee will oversee the review of this policy and ensure quarterly reporting to the Board occurs.

Chief Executive Officer and Senior Management Team

Professional responsibility for safeguarding sits with the Chief Executive Officer and the Senior Management Team. It is their responsibility to ensure that there is a strong culture of safeguarding across Anti-Slavery International. This involves recognising the importance of diversity within the organisation, articulating clearly and confidently the behaviour expected of leadership and all those working within the organisation and recognising and rewarding practices and behaviour which safeguard children, young people and vulnerable adults. **The Head of Programmes and Advocacy is currently the designated Safeguarding Lead within the Senior Management Team.**

⁴ <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

⁵ <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

⁶ <https://bateswells.co.uk/wp-content/uploads/2019/06/safeguarding-for-trustees-pdf.pdf>

Programme Managers and Policy Managers

Additional professional responsibility lies with Programme Managers, Policy Managers for safeguarding issues within the projects they are overseeing. This includes being accountable for ensuring that all representatives and partners connected with the projects are adhering to the safeguarding processes and are clearly following the safeguarding reporting procedures. Managers are expected to work with the Safeguarding Manager at point of project proposal and during implementation to ensure safeguarding standards are considered and adhered to.

Safeguarding Manager

The Safeguarding Manager holds professional responsibility for the development and implementation of all safeguarding frameworks at Anti-Slavery International. This includes providing quarterly updates to the board and chairing CEO, Head of Programmes and Advocacy and Safeguarding Trustee. They must ensure that all safeguarding policies, processes, and systems are operating effectively across the organisation and that all staff receive appropriate training that is commensurate with their roles.

Fundraising and Communication Roles

Fundraising and Communications Roles are expected to adhere to the principles and guidance in this policy. It is also the responsibility of the fundraising and communications team to stay up to date with the guiding principles set out by the Institute of Fundraising⁷, and the guidance on fundraising for people in vulnerable circumstances⁸. Anti-Slavery International takes the stories of our beneficiaries extremely seriously and as an ally to survivors has pledged to represent survivors of modern slavery with dignity⁹ and respect.

Anti-Slavery International will:

- Choose respectful images factually representative of the issue being communicated and will choose stock images carefully.
- Select text that accurately represents the story. Be careful to avoid sensationalist language.
- Respect survivors' right to privacy and dignity.
- Obtain prior consent to using a personal story, be transparent and accurate about the process and how it will be used (See Annex 2 for consent form) Consent forms and sensitive beneficiary data are stored securely by the Communications Team in line with the Anti-Slavery International Communications Policy and UK GDPR¹⁰)
- In the event of a Safeguarding Incident that may be of interest to the media (due to the profile of the perpetrator or otherwise) it is the responsibility of the Head of Communications, alongside the Safeguarding Manager to develop a responsible media management plan that respects the nature of the allegations made. The safety, wellbeing, and anonymity of the victim or person reporting is paramount.

Implementing Partner Organisations

This policy does not apply directly to organisations that Anti-Slavery International funds, supports and/or otherwise aligns with, unless they do not yet have their own safeguarding policies and procedures in place. Anti-Slavery International proactively supports our partner organisations to effectively safeguard vulnerable adults, young people, and children, and adheres to specific safeguarding requirements embedded in our Partnership Agreements

⁷ <https://www.institute-of-fundraising.org.uk/guidance/managing-fundraising/safeguarding-and-whistleblowing/safe-and-supportive-working-culture/>

⁸ <https://www.institute-of-fundraising.org.uk/blog/how-to-fundraise-with-people-in-vulnerable-circumstances/>

⁹ <https://www.freedomunited.org/advocate/my-dignity-pledge/>

¹⁰ <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

with all partners. Anti-Slavery International is committed to applying the following safeguarding principles to the work that we do and expects our partners to apply the same principles in their work and through their delivery chains.

The safeguarding principles that underpin all our due diligence are as follows:

- **Everyone** has responsibility for safeguarding.
- Do no harm.
- Organisations have a safeguarding duty of care to beneficiaries, staff, and volunteers, including where down-stream partners are part of delivery. This includes children and vulnerable adults in the community who are not direct beneficiaries but may be vulnerable to abuse.
- Act with integrity, be transparent and accountable.
- All activity is done in the best interests of the child/vulnerable person.
- A child is defined as someone under the age of 18 regardless of the age of majority/consent in country.
- All children shall be treated equally, irrespective of race, gender, religion/or none, sexual orientation, or disability.
- Organisations that work with children and vulnerable adults should apply a safeguarding lens to their promotional communications and fundraising activities.

These principles are aligned with the UN Convention on the Rights of the Child (UNCRC).¹¹

Implementing partners are expected to have the following policies and procedures in place and/or actively working towards them being in place:

- Safeguarding Policy
- Complaints (Whistleblowing) Policy
- Recruitment (Human Resources) Policy
- Risk Evaluation Framework
- Code of Conduct
- Governance and Accountability Standards

The Safeguarding Manager will support Program Managers, Policy Managers, relevant representatives and ASI implementing partners to develop the above. The approach to training, supporting, and implementing the above policies and procedures with implementing partner teams will be proportionate in accordance with the level of risk associated with the programme, and the size and capacity of the partner organisation. Risk assessments will be conducted with partners to demonstrate and support adequate controls being in place to mitigate identified risks. If there is anything in the policy which is not clear, it is the responsibility of the individual representative and/or implementing partner to seek clarification from the Safeguarding Manager, Senior Management Team, or the Nominated Trustee for Safeguarding. The guidelines and procedures contained within this policy will be reviewed by the Safeguarding Manager, 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. Additional updates may be added periodically if sector or institutional guidelines require amendments to be made.

¹¹ <https://www.gov.uk/government/publications/dfid-enhanced-due-diligence-safeguarding-for-external-partners/enhanced-due-diligence-safeguarding-for-external-partners#which-partners-do-the-enhanced-standards-apply-to>

2.2 Contact details

Position	Name	Email
Safeguarding Manager	Olivia Shaw	safeguarding@antislavery.org/ o.shaw@antislavery.org
Head of Programmes and Advocacy	Catherine Turner	c.turner@antislavery.org
Head of Fundraising and Communications	Ryna Sherazi	r.sherazi@antislavery.org
Chief Executive Officer	Jasmine O'Connor	j.oconnor@antislavery.org
Safeguarding Trustee	Sarah Hemens	s.hemens@antislavery.org

2.3 Guiding Principles for Child Safeguarding

A **Child** is anyone under the age of 18 years in accordance with Article 1 of UN Convention on the Rights of the Child (UNCRC) (1989).¹²

- 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 face-to-face, virtual, digital, and/or phone contact with our organisation and all representatives, and Anti-Slavery International has a responsibility to ensure our staff and operations 'do no harm'¹³.
- All children have equal rights to protection.

See Glossary of Terms for definitions of Child and Young Person.

2.4 Guiding principles for Adult Safeguarding

A **Vulnerable Adult** is a person aged 18 or over whose ability to protect himself or herself from violence, abuse, neglect, or exploitation, or to make informed decisions free from duress or influence are significantly impaired. This impairment could relate to the following factors: physical or mental disability; illness; old age; emotional fragility or distress; gender; ethnicity; religious beliefs or otherwise. This 'vulnerable or at-risk' state can be temporary or indefinite and should be understood as a continuum which reflects the shifting nature of vulnerability in the context of our work. The nature of the programmes and projects implemented by Anti-Slavery International means that any adult with whom we have contact with through our activities could be deemed as vulnerable or at-risk.

The aims of safeguarding adults are:

- To prevent harm and reduce the risk of abuse or neglect to vulnerable adults.
- To safeguard individuals in a way that supports them in making choices and having control in how they choose to live their lives.
- To promote an outcomes approach in safeguarding that works for people resulting in the best experience possible.

¹² <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

¹³ <https://www.ohchr.org/Documents/Publications/Chapter02-MHRM.pdf>

- To raise awareness so that professionals, other staff, and communities as a whole play their part in preventing, identifying, and responding to abuse and neglect.¹⁴

Assessing an adult's capacity to make decisions that affect them

Five principles which underpin the Mental Capacity Act 2005:

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 and empower them to communicate their story and their needs in their own way.
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.

Follow the two-stage test for assessment of capacity

Stage 1:

- Does the person have an impairment of the mind or brain (temporary or permanent) or a physical impairment (temporary or permanent) that means they are unable to communicate?

If yes go to stage 2

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, in written format).

Failure on one point may determine lack of capacity.

To act in a person'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.
- Consider the views of others – i.e. guardians, carers, relatives, friends, advocates.
- Consider the least restrictive options.

Further definitions relating to safeguarding are provided in the *glossary section* of this document.

3. Breaches of this policy and/or safeguarding procedures and/or guiding principles

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 (informed decision to be made by Human Resources Manager)
- Trustees – termination of Board membership, reporting to Charity Commission
- Volunteers and interns – termination of the relationship with Anti-Slavery International

¹⁴ <https://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf>

- 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, REPORT TO POLICE.

Anti-Slavery International commits to addressing safeguarding throughout its all areas of its work, by considering three pillars of safeguarding: **Prevention, Reporting and Response.**

4. Pillar 1: Prevention

4.1 Why is context important for safeguarding risk prevention?

The unique contexts that Anti-Slavery International is operating in can increase the risk of safeguarding violations. Anti-Slavery International understands that safeguarding is the responsibility of all, and that safeguarding violations can occur across all parts of the organisation. For example, in some places abuse or exploitation of certain groups of children, vulnerable adults or individuals, may be seen as a ‘norm’ locally, and/or staff and volunteers may have prejudices against certain people, such as, adults with disabilities or street homeless children. Another example could be fundraisers with access to the contact details of young people or the elderly.

These types of norms can mean that:

- Children, young people, or vulnerable adults are more at-risk of abuse, this could include abuse by international as well as local/national NGO staff, volunteers, partners, suppliers, incentive workers and other representatives.
- Indicators of potential abuse may be less likely to be noticed by others, as they are considered ‘normal’.
- Abuses are less likely to be reported and responded to because representatives are ‘trusted’.
- Protections/response from local authorities may not be robust or reliable.

Equally these norms could be:

- Using photos and stories of beneficiaries without their consent.
- Misrepresenting the facts or data to create an image of beneficiaries that misrepresents them.
- Allowing non-compliance of partner organisations to go unchecked and allowing a long-standing professional relationship to get in the way of good judgement and risk mitigation strategies.

To prevent safeguarding incidents from happening, or going unreported, it is important that all Anti-Slavery International representatives are aware of the risk factors that relate to programmes, projects, policy work, external and internal communications, fundraising and business and financial practices.

4.2 Contextual Risk Factors

The following is not a complete list, but does relate to some external factors that can increase the safeguarding risk profile of Anti-Slavery International’s work:

- High levels of COMMERCIAL SEXUAL EXPLOITATION
- Presence of EXTREME HUNGER or lack of access to other vital resources such as water, healthcare, or economic opportunities
- Prevalence of GENDER BASED and SEXUAL VIOLENCE
- High levels of HUMAN TRAFFICKING and/or MODERN SLAVERY (where people are exploited and completely controlled by someone else, and unable to leave)
- Prevalence of Child/Early MARRIAGE OF GIRLS

- Certain Groups who are ROUTINELY DEHUMANISED (for example, refugees, adults with disabilities, children who live on the street or minority ethnic groups)
- CHILD RECRUITMENT INTO ARMED GANGS, militia, police, or national forces
- Acceptance of PHYSICAL VIOLENCE as a form of punishment (called ‘physical and humiliating punishment’ or PHP)
- Weak, ineffective, or CORRUPT PROSECUTION/JUSTICE SYSTEMS
- DISPLACEMENT WITHIN COMMUNITIES, or to IDP or refugee camps
- The presence of international organisations such as peacekeeping missions
- Strong belief in WITCHCRAFT
- High levels of EXPLOITATIVE DOMESTIC SERVITUDE (including informal fostering arrangements)
- SEPARATION OF CHILDREN from care givers
- GENDER, POWER, and economic inequalities
- Lack of acceptance of people with DIVERSE GENDER, SEXUALITIES or BODIES

4.3 Specific Risk Factors

Safeguarding risk factors can be external, as the above list demonstrates. Safeguarding risks can also be specific to the operating standards within an organisation. The following is not a complete list, but are some internal factors that can increase the safeguarding risk profile of our work:

- GENDERED STAFF team
- Safeguarding policies NOT IN PLACE or OUT OF DATE
- only ONE POINT OF CONTACT within an organisation
- STAGED or INFLEXIBLE partner visits
- NON-COMPLIANCE or non-willingness to comply with donor standards
- staff and volunteers have REGULAR CONTACT WITH CHILDREN or VULNERABLE ADULTS
- Undeclared or poorly managed Trustee conflicts of interests
- noticeable and CONCERNING POWER DYNAMICS within the organisation
- LIMITED or NO INVOLVEMENT OF BENEFICIARIES in shaping organisational practice
- LIMITED VETTING/PRE-EMPLOYMENT CHECKING of staff and volunteers
- NON-WILLINGNESS OF SENIOR STAFF TO ATTEND ANY TRAINING COURSES (MEL, compliance, safeguarding)
- Staff WORK and PERSONAL EMAIL ADDRESSES are the same

The above lists of Contextual and Specific Safeguarding Risk Factors are part of the Anti-Slavery International Safeguarding Risk Assessment Framework and can also be found in the Anti-Slavery International 2020 Implementing Partner Risk Assessment Template. This risk assessment template is used to support the assessment of the external and internal safeguarding risks of Anti-Slavery International’s implementing partners, and is completed in collaboration between the ASI Safeguarding Manager, the ASI Partner Organisation, and the ASI Programme or Policy Manager (where necessary). A Safeguarding Risk Assessment Evaluation Form is then completed by the ASI Safeguarding Manager and both documents are shared between Anti-Slavery International and the relevant implementing partner organisation.

4.4. Anti-Slavery International organisational responsibilities

Anti-Slavery International encourages representatives to foster a positive and participatory environment for all people. Representatives should seek to uphold the highest professional standards when engaging with adults, children, and young people.

To ensure the safety of children, young people, and vulnerable adults *Anti-Slavery International* will:

- Implement stringent safeguarding procedures when recruiting staff, managing, and deploying staff and associated personnel.
- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and related policies and procedures.
- Adhere to a Code of Conduct for all staff.
- Integrate safeguarding best practices throughout the project management cycle.
- Effectively manage staff through supervision, support, and ongoing training (at a level commensurate with their role).
- Value children, young people, and vulnerable adults, listening to them, respecting them, and taking their views into account.
- Follow up on reports of safeguarding concerns promptly, and according to due process.
- Design and undertake all projects and work activities in a way that protects people from risk of harm that may arise from coming into, face-to-face or virtual, digital, or phone contact with Anti-Slavery International. This includes the way in which information about individuals in our programmes is gathered and communicated, inclusive of contexts of significant poverty, natural disaster, health pandemics, or conflict.

Remember that the abuse of children, young people, and vulnerable adults may be minimised in the light of apparently more urgent life or death issues. If in doubt, report the concern.

4.5 Risk Management

It can feel uncomfortable but thinking about how potential abusers could access children and/or vulnerable adults, to harm them, can help you to prevent this harm from occurring.

Anti-Slavery International prevents the abuse of children, young people, and vulnerable adults by adopting a robust risk management approach which identifies and manages risks to children or adults from people, programmes, or operations. All systems, processes, programmes, projects, and activities that may connect to children and vulnerable adults must be risk assessed, preferably at the design or applications stage before implementation.

Risks identified should, where possible, be mitigated by appropriate measures. In cases where a process, event or activity is deemed high risk e.g. the introduction of a social media platform, delivering a campaign on child labour in a difficult context, or running an event including children, or running a high profile media campaign, the Senior Management Team (SMT) need to understand the risks and give sign off on whether or not the initiative can go ahead. It may be the case that not all risks can be mitigated. In these circumstances the SMT need to understand the benefits and risks of continuing with the initiative, make an informed decision and then be accountable for that decision.

4.6 Recruitment and Engagement

4.6.1 Recruiting staff

Anti-Slavery International strives to uphold the highest standards in its recruitment procedures. Positions (paid and voluntary) that require a DBS check will have this stated clearly in the job description and recruitment post when advertised.¹⁵ All recruitment will include a 'safer recruitment statement' which makes clear the high standards of safeguarding the organisation adheres to.

¹⁵ <https://www.gov.uk/find-out-dbs-check>

Anti-Slavery International will carefully follow recruitment and due diligence procedures during the selection process of staff members including carrying out reference checks, police checks and DBS checks for all eligible roles. Roles which are not eligible for standard or enhanced checks, but which may have some access to vulnerable adults, children or sensitive safeguarding information will be risk assessed by the hiring manager and Safeguarding Manager and a basic DBS check may be requested from the employee. Where neither DBS nor police checks are possible, additional references will be sought.

Anti-Slavery International is an equal opportunities employer under the UK Equality Act (2010)¹⁶. In line with the Police Act 1997, Anti-Slavery will not discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed. Anti-Slavery recognises that victims of modern slavery may have a criminal record relating to their exploitation, Anti-Slavery will not discriminate unfairly. Applicants with lived experience of modern slavery are strongly encouraged to apply to any role at Anti-Slavery International.

4.6.2 Engaging consultants

When entering a contract with a consultant who may have access to children, vulnerable adults, and/ or sensitive data the Safeguarding Manager at Anti-Slavery International will provide a safeguarding briefing before any work commences. The hiring manager is responsible for arranging this briefing, as necessary. If a consultant will be interfacing with under 18s, they will need to undergo a police check and/or reference checks in their country of residence or origin. Consultants will be required to sign the Code of Conduct, the Safeguarding Policy, and the Employee Handbook, and must adhere to all safeguarding principles. During any field or partner visits that involve direct work with children and vulnerable adults, where possible, all consultants including photographers, should be accompanied by an Anti-Slavery International paid staff member or paid staff member of an implementing partner organisation.

4.6.3 Engaging implementing partners working with children, young people, or vulnerable adults

If an implementing partner will be working directly with children, young people or vulnerable adults, before entering into any contractual agreements with them, including memorandums of understanding, a safeguarding due diligence check must be carried out before the agreement is approved and signed. All formal partnership agreements must also include safeguarding clauses which require partners to maintain a robust safeguarding framework alongside effective reporting and response procedures. Safeguarding standards of partner organisations must align with the key principles outlined in this policy (see section 2.1).

Contractual agreements must contain key safeguarding clauses which include but are not limited to the following:

- Partners must deliver the terms of the agreement in accordance with all appropriate child protection and safeguarding standards and in accordance with a safeguarding policy which complies with the minimum standards required by Anti-Slavery International.
- Partners must notify Anti-Slavery International immediately of any, and all incidents in which beneficiaries are harmed or placed at risk of harm, providing any details that Anti-Slavery International requires.
- Partners must comply with all local safeguarding reporting requirements in addition to notifying Anti-Slavery International.
- Serious safeguarding breaches could result in the termination of the partnership agreement and related funding.

¹⁶ <https://www.gov.uk/employer-preventing-discrimination>

4.6.4 Education and training

All representatives of Anti-Slavery International will receive an induction to safeguarding within one month of joining the team. Training may be online or in-person.

All representatives will be required to read the Anti-Slavery International Safeguarding Policy and abide by the safeguarding principles it sets out, in both their personal and professional lives. Representatives must also sign up to the Code of Conduct. All representatives will be required to re-sign annually to ensure any changes to the policies are incorporated into organisational working practices.

Anti-Slavery International Safeguarding Leads, Senior Staff and the Board of Trustees will receive specialised training that supports them to meet their safeguarding responsibilities.

Implementing partners will receive safeguarding training and support commensurate to their needs and the needs of the programme implementation strategy.

4.7 Staff Responsibilities

4.7.1 Child Safeguarding

Anti-Slavery International representatives and associated personnel **must not**:

- Travel or be alone with a child.
- Engage in sexual activity with anyone under the age of 18.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional, or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.

4.7.2 Adult Safeguarding

Anti-Slavery International representatives and associated personnel **must not**:

- Promise confidentiality to an adult.
- Sexually abuse or exploit vulnerable adults.
- Subject a vulnerable adult to physical, emotional, or psychological abuse, neglect, or exploitation.
- Exchange money, employment, goods, or services for any sexual activity. This includes any exchange of assistance, goods or services that is due to beneficiaries of assistance.
- Engage in any sexual or emotionally intimate relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.

The development of sexual relations between Anti-Slavery International Staff and children, adults or beneficiaries is in contravention of Anti-Slavery International's **Code of Conduct and Safeguarding Principles**. Any breach, or failure to report such a breach, could result in disciplinary action.

Members of staff must disclose to their line manager or to another member of SMT any relationships they have with an individual member of staff or stakeholder that may impair their ability or judgement in undertaking responsibilities associated with employment in the course of their work, including any sexual relationships between Anti-Slavery International staff at different levels within the organisational hierarchy, or between Anti-Slavery International staff and local partners. Sexual relationships between Anti-Slavery International staff and local partners are strongly discouraged. SMT will review the situation on a case-by-case basis and consider existing and potential conflict of interests and decide whether appropriate actions can be taken which will effectively manage any such conflict of interest.

4.7.3 Protection from Sexual Exploitation and Abuse (PSEA)

Additionally, Anti-Slavery International representatives **are obliged** to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by an Anti-Slavery International staff member or associated personnel to the Safeguarding Manager, or other appropriate member of staff.
- Ensure that they are never alone with Anti-Slavery International child beneficiaries, or in a situation where their actions could be misinterpreted as an abuse of power by adult beneficiaries.

Before starting work with a new partner, the project lead and the safeguarding manager must conduct a first stage context analysis to understand and mitigate the safeguarding risks posed by the programme. Partners assessed as medium to high risk will need to sign a safeguarding due diligence contract, complete with timeframes.

4.8 Communications and Social Media

Representatives of Anti-Slavery International must refer to the Anti-Slavery International's **Communications Policy** when undertaking any communications activities with children, young people, or vulnerable adults, and must operate in accordance with this Safeguarding Policy and adhere to the safeguarding principles therein.

4.8.1 Informed Consent for All Assets

Engaging children, young people, and/or vulnerable adults in activities which may include taking their photograph, filming or using other image or sound recording equipment, must only be done with full and informed consent from each vulnerable adult and/or each child and their parent/guardian, obtained before conducting the activity itself. All signed consent forms must be stored securely by the communications team, alongside the collected data. Where necessary, the consent form will be translated into local languages.

If the person is a child, make sure that the parent/guardian and child **understand where and why their image will be used** and who it could be seen by. Make sure children and parents/guardians also know that they can withdraw their consent at any time and know who to contact, should they wish to do so.

See Annex 2: Informed Consent Form for Interviews, Photography and Media. This form must be understood and completed with beneficiaries prior to use by Anti-Slavery International of images, stories or other forms of personally owned participant or beneficiary assets.

4.8.2 Social Media

Anti-Slavery International representatives **must not** upload or post images or content from work-related trips onto their private social media accounts. However, representatives are permitted to share across their social media accounts all official Anti-Slavery International social media posts through their own private accounts.

4.8.3 Positive Portrayal

All children, young people, and adults depicted in Anti-Slavery International external communications, must be portrayed with dignity and respect. Anti-Slavery International should avoid depictions which may victimise or degrade the individual or reinforce negative stereotypes. It is also important to ensure that portrayals **do not sensationalise** the issue of modern slavery. (see section 2.1 Fundraising and Communication Roles)

4.8.4 Events hosted by Anti-Slavery International

For all events hosted or co-hosted by Anti-Slavery International representative must ensure that they have carried out a safeguarding risk assessment if the event involves or may involve vulnerable adults, children, or young people. Once completed, the risk assessment must then be sent to the Safeguarding Manager for review and approval. If the risk assessment shows the overall level of risk is medium or high, additional safety and safeguarding controls must be put into place to either eliminate, isolate, or minimise the risk. **If the activity is still rated as high risk for vulnerable adults, children, and/or young people, it must not be undertaken. The final decision to cancel an event or meeting can be taken by any member of the Senior Management Team.**

5. Pillar 2: Reporting

5.1 Reports and Concerns

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.

All Anti-Slavery International staff and representatives must adhere to and follow the procedures detailed in this policy. Staff and representatives must follow the reporting procedures mapped out below if an allegation arises. Irrespective of where a safeguarding concern arises, staff must report any concerns or allegations to the Safeguarding Manager within 24 hours. The Safeguarding Manager will then complete a **Safeguarding Concern Reporting (SCR) Form** (*Annex 1*) for information recording purposes.

On the Safeguarding Manager's professional judgement, cases which pose harm to children, young people, and vulnerable adults, will be escalated to the appropriate member of the Senior Management Team, and when necessary to the CEO and the Safeguarding Trustee. If the concern or allegation involves the Safeguarding Manager, then staff must submit the report directly to the Head of Programmes and/or CEO. It is the responsibility of Safeguarding Manager, after consulting with the Trustee for Safeguarding, to report serious concerns to the UK Charity Commission.

Anti-Slavery International will apply appropriate disciplinary measures to staff found in breach of policy.

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:

- The adult has given permission for the concern/disclosure to be shared, and/or
- Where the adult is deemed not to have the mental capacity to decide on next steps themselves and/or
- Someone else is at risk of harm even if the adult does not give permission to share the concern
- The person is a child

5.2 Disclosures

5.2.1 Receiving a disclosure

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:

- Stay calm, listen carefully.
- Show acceptance of what the person is saying.
- Reassure the person that telling someone about it was the right thing to do.
- Be aware that the person may have been threatened or bribed not to tell anyone.
- Tell them that you now must do what you can to keep them (or the child or young person who is the subject of the allegation) safe.

- Let the person know what you are going to do next and who else needs to know about it.
- Let the person tell his or her whole story, only ask questions for clarity – **do not** try to investigate.
- Ask the person what they would like to happen because of what the person has said, and **do not** make or infer promises you cannot keep.
- Never push for information. If the person decides not to tell you after all, then accept that and let them know that you are always ready to listen.
- Never promise to keep the disclosure a secret but **do** assure the person that you will treat the information sensitively.
- **Do not** take notes when the person is speaking but **do** make written notes as soon as you can afterwards, recording what was said verbatim where possible.
- If you need to clarify your understanding, ask open questions and be careful to not influence what the person is 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 (social workers, police, nurses)**
- Recognise that there may be inherent difficulties in interpreting what is said by someone who has a speech disability and/or differences in language.
- **Do not** permit personal doubt to prevent you from reporting the allegation.
- If the person is an adult, ask their permission to share the concern/disclosure with the Safeguarding Manager. If the person is a child, then you do not need their consent to report.
- Inform yourself about local legislation as this may determine actions such as who you are permitted to share information with¹⁷.

Helpful things you may say:

- “Thank you for telling me, you were right to raise it.”
- “I can help to raise this with the right people to help you.”

DO NOT ask or say:

- “Why didn’t you tell anyone before?”
- “Are you sure this is true?”
- “I can’t believe it.”
- “I am shocked!”
- “Don’t tell anyone else.”

Concluding actions:

- Reassure the person that they were right to tell you and show acceptance.
- Let the person know what you are going to do next and that you will let them know what happens.
- Immediately contact the Safeguarding Manager.
- Consider your own feelings and seek support if needed.

5.2.2 Concerns or Disclosures Reported via Social Media

- If the concern is raised via a social media account, **do not** ask for any personal details. **Do** thank them for bringing the concern to your attention and explain to the person that as they have contacted you in a professional capacity, your advice would be to email the concern to safeguarding@antislavery.org and/ or contact the Modern Slavery Helpline via email info.mshelpline@unseenuk.org or phone 08000121700 for 24/7 confidential advice and reporting.

¹⁷ Anti-Slavery is involved with several safeguarding networks and as of May 2020 is working with Ashurst Law Firm to develop 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.

- **Do not** promise to keep what they have told you secret.
- Alert the Safeguarding Manager of the concern. You can do this via phone, email or in person within 24 hours of the concern being raised.
- Try to move the conversation from the social media platform as quickly as possible by providing your work email to continue the conversation. This is to ensure that anyone who reaches out to a representative of Anti-Slavery International understands that they are being responded to by the organisation in a professional capacity, rather than the member of staff as an individual.
- It is important that all parties concerned are treated with the same respect and procedure, and not discriminated against.
- The role of the person reporting or the Safeguarding Manager (where appropriate) is to ask for written consent in an email from the concerned party for Anti-Slavery International to either communicate the concerns to the appropriate bodies or to signpost the person to the relevant agencies.
- If the person is in immediate danger, you must encourage them to call 999.
- Anti-Slavery International is an ally to survivors of slavery and all our communication with survivors or those disclosing issues of exploitation on behalf of survivors should be conducted in a sensitive and concerned manner that acknowledges the courage of the person reporting the concern.
- It is not permitted for representatives of Anti-Slavery International to ask for personal details or the details of a disclosure via social media.
- All information must be recorded using the **Safeguarding Concern Reporting (SCR) Form** (*Annex 1*) completed by the Safeguarding Manager and stored securely.

5.2.3 External Safeguarding Concerns about people not affiliated with Anti-Slavery International

Representatives of Anti-Slavery International may receive reports or safeguarding concerns about people who are not affiliated with the organisation and who are based outside of the UK. If you receive a report or concern from an unknown source about someone who is in danger and/or a victim of modern slavery and that person is outside of the UK and the procedures in section 5.2.2 have been followed but due to the location of the victim and/or report further action cannot be taken, you may be required to pass on the information to INTERPOL. You must ask advice from the Safeguarding Manager before taking this action.

You can find the INTERPOL reporting form here <https://www.interpol.int/en/Contacts/Contact-INTERPOL>. Once you have made a submission, you are required to send an email with your professional details and a brief description of the concern to Laura Clark L.CLARK@interpol.int. You will be required to explain that Anti-Slavery International has received advice from the International Liaison Team Intelligence Directorate/UK International Crime Bureau at the National Crime Agency about this process and you must cc: safeguarding@antislavery.org when you send the email and in any further correspondence.

It is unlikely that you will be given any feedback about the case at all, this is because of the restrictions around how INTERPOL store information that is not from an INTERPOL 'trusted' source. It is important to note that you may be required by INTERPOL to report the concern another way, and if so, you would have a duty to do so. The person reporting is required to keep the Safeguarding Manager updated at each stage.

5.2.4 Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. **Information relating to the concern and subsequent case management should be shared on a need to know basis only and must always be kept secure.**

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 Safeguarding Manager.

It is important to remember that the Anti-Slavery International is open plan office space and is not an appropriate place to discuss confidential safeguarding concerns. Conversations of a confidential nature should be conducted away from other people to ensure the respect and dignity of those involved in the concern.

6. Pillar 3: Response

6.1 Procedures and Mechanisms

Anti-Slavery International has procedures to follow in the case of safeguarding concerns, allegations and/or incidents. The mechanisms differ slightly depending whether the concern relates to a child or an adult, and where in the world the alleged incident took place. If the concern is raised in the UK, then UK legislation must be followed.

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/allegation/incident arises, as well as to the procedures and guidance within the Anti-Slavery Safeguarding Framework. Where the 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. If the partner organisation does not yet have a safeguarding policy then the Anti-Slavery International policy will need to be used, inclusive of partner expertise in local and contextual reporting mechanisms. All procedures timings are considered across working days of Monday to Friday.

Representatives must use their professional judgment as to the urgency of a reporting a safeguarding concern when outside of working hours. If the concern is raised outside of working hours sending an email within the procedural timeframe is best practice. The Safeguarding Manager will contact the person reporting to gather details of the concern and to fill out the **Safeguarding Concern Reporting (SCR) Form**. In relation to serious concerns that arise outside of working hours, it is to the discretion of the representative to make out of hours contact with the Safeguarding Manager.

See Flowcharts 6.1.1, 6.1.2, 6.1.3 and 6.1.4 (pages 21-24 of this policy) **for Anti-Slavery International's Safeguarding Reporting Procedures.**

6.2 Enabling reports

Anti-Slavery International will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Anti-Slavery International's Whistleblowing Policy.

Anti-Slavery International will also accept concerns raised by external sources such as members of the public, partners, and official bodies. Concerns raised by members of the public must be reported to the Safeguarding Manager as per the reporting procedures.

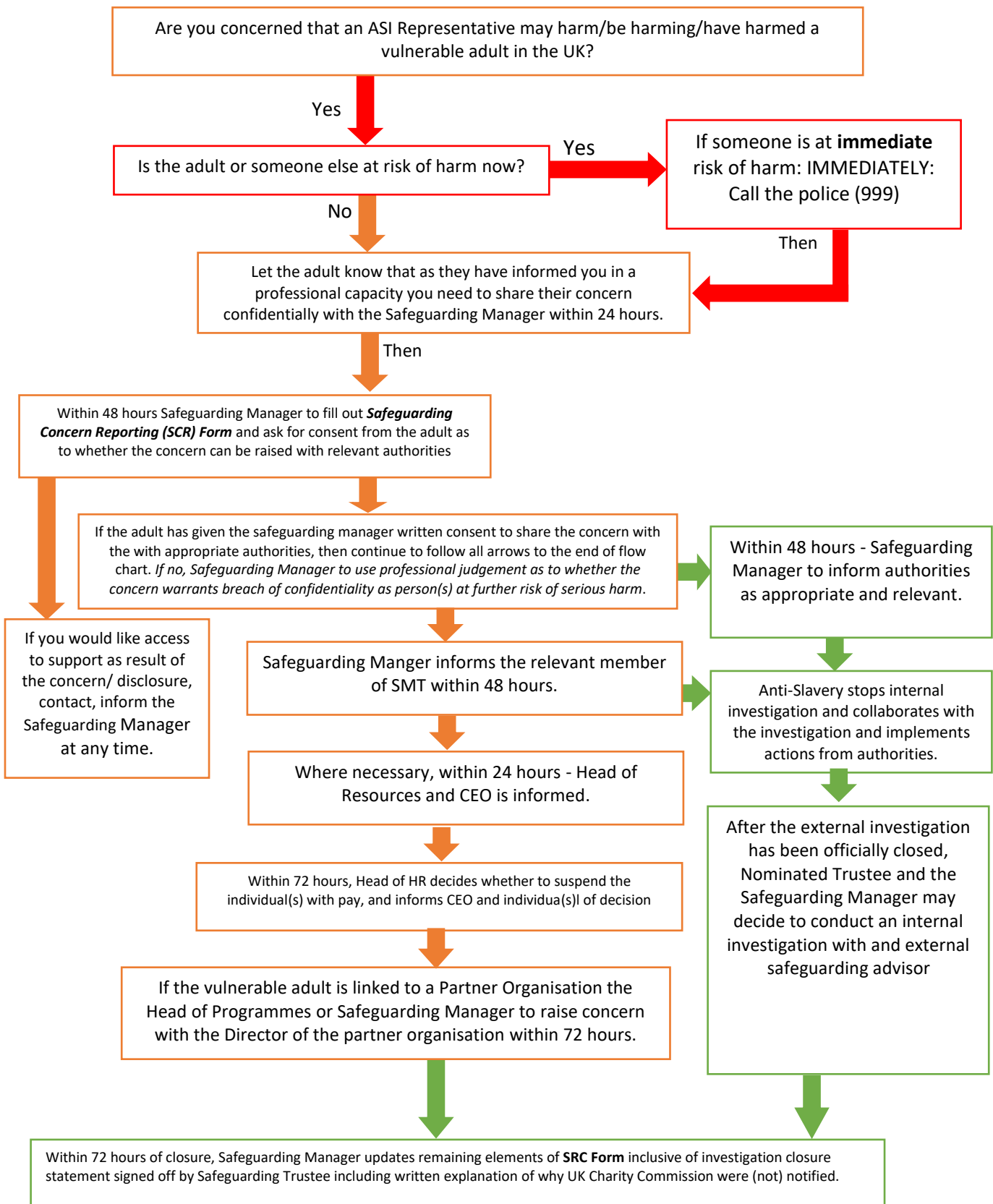
7. Safeguarding Framework

Within the Anti-Slavery International shared drive, central folder, you can find the **Safeguarding Framework** folder.

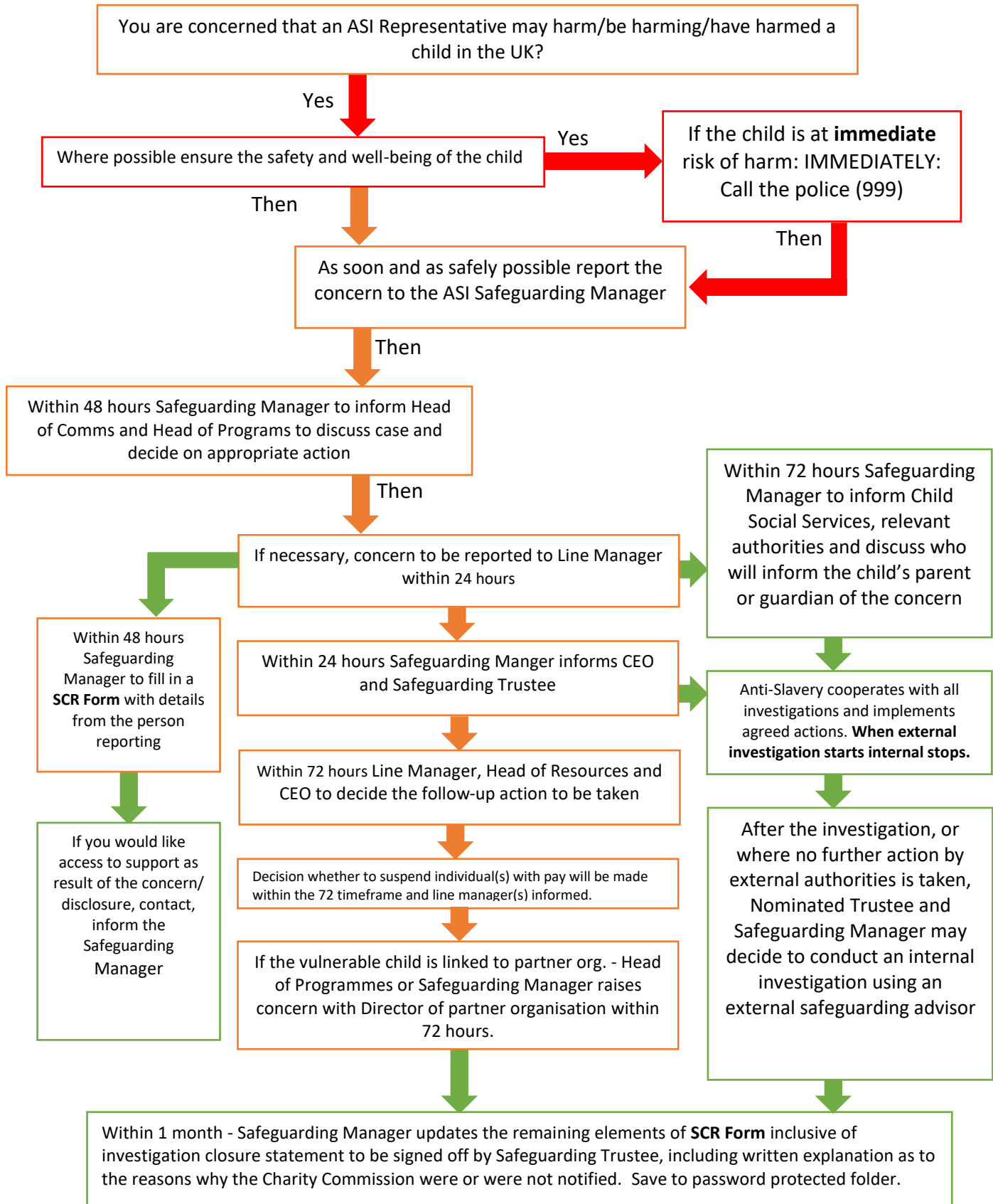
7.1 What is included in the Safeguarding Framework?

- Safeguarding Concern Reporting Form
- Partner Risk Assessment Template
- Safeguarding Assessment Evaluation Form
- Minimum Standards of Safeguarding Statement
- Duty of Care Protocol Template
- Safeguarding Due Diligence Checklist
- Safeguarding Due Diligence Partner Contract
- Partner Safeguarding Concern Report Form
- Safeguarding Manager partner introduction email template
- Safeguarding Staff Induction Training Slides

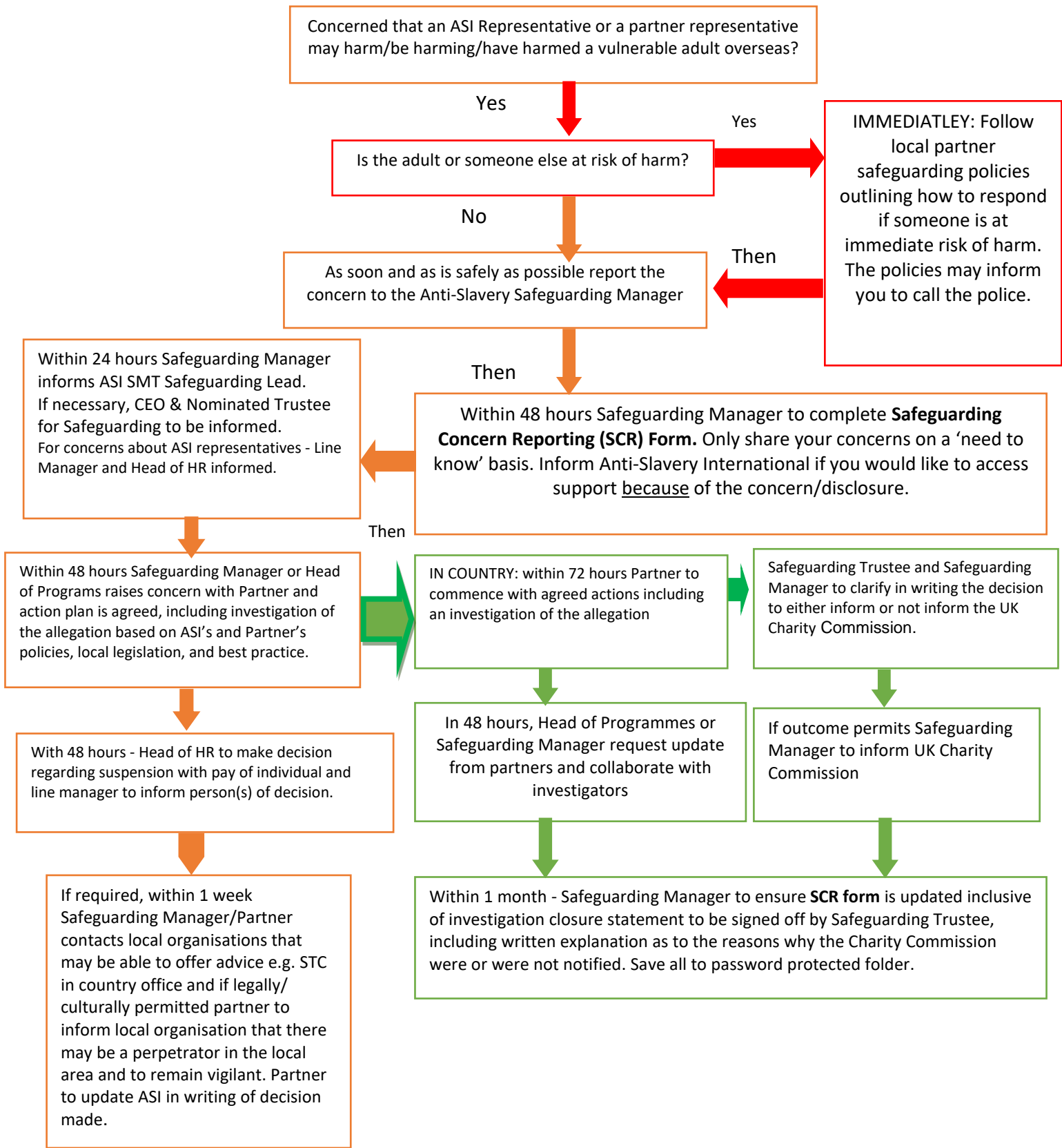
6.1.1 Safeguarding adults inside the UK



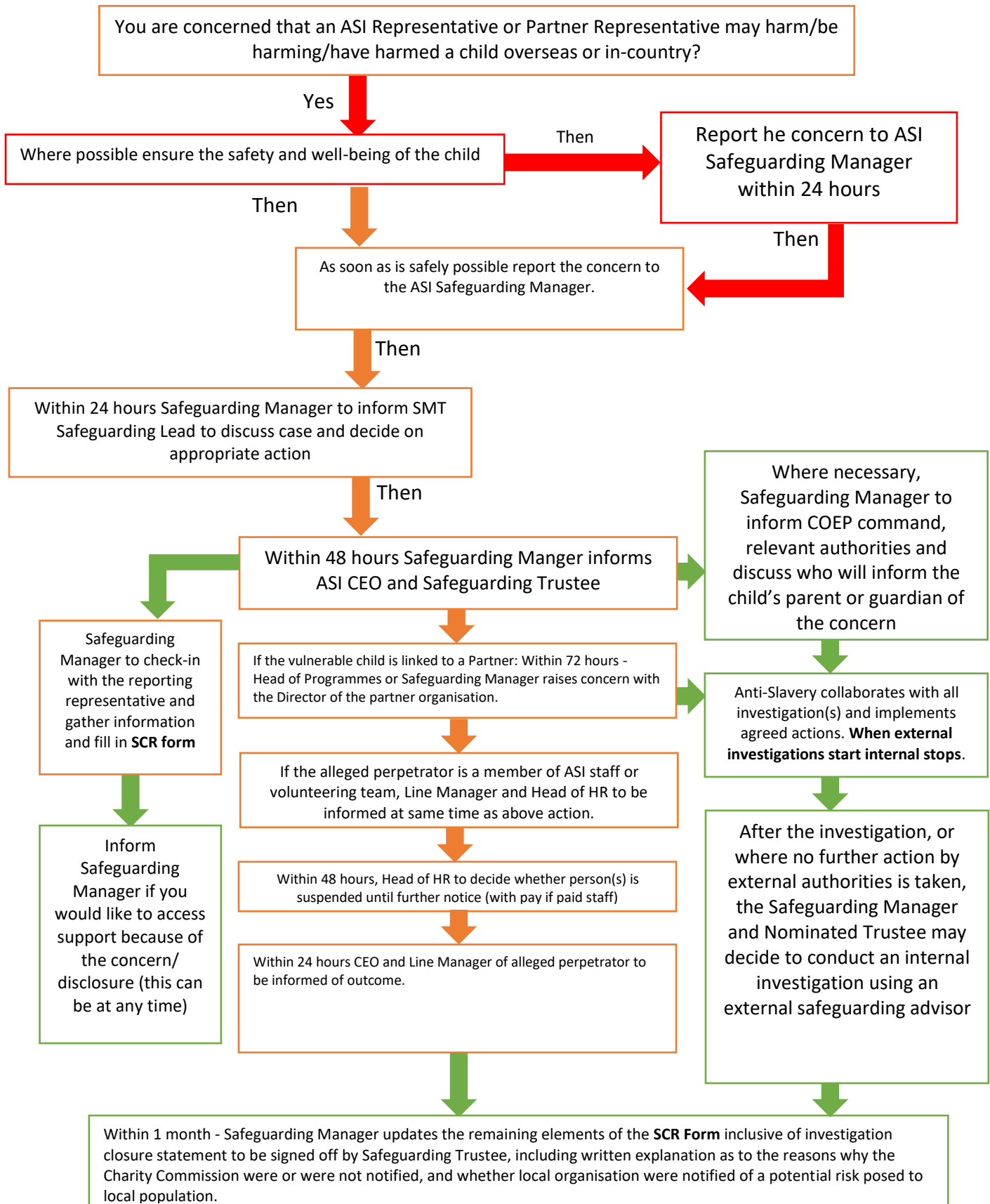
6.1.2 Safeguarding children inside the UK



6.1.3 Safeguarding adults outside of the UK



6.1.4 Safeguarding children outside the UK



8. Associated policies

- Code of Conduct (inclusive of working with survivors of exploitation framework)
- Data Protection Policy
- Dignity at Work (Anti-Bullying and Harassment) Policy
- Whistleblowing/ Complaints (Disclosure of Malpractice in the Workplace) Policy
- Communications Policy
- Safer Recruitment Policy
- Staff Wellbeing Policy¹⁸

9. Glossary of Terms

Beneficiary (Beneficiaries) of Assistance

Someone who directly receives goods or services from any part of Anti-Slavery International's programmes. Note that misuse of power can also apply to the wider community that Anti-Slavery International serves, and can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18.

Concern

Any suspicion or worry that a child, young person, or adult may be at risk of harm or has been harmed and has not yet been substantiated.

Gender responsive safeguarding is an approach to safeguarding that considers gender when addressing the specific needs of girls, boys and other gender identities, also ensuring that safeguarding measures address particular protection risks for children and young people that are rooted in challenges relating to gender discrimination¹⁹.

Harm

Psychological, physical and any other infringement of an individual's rights.

Incident

An adverse event, whether actual or alleged, which results in or risks significant:

- Loss of your charity's money or assets
- Damage to your charity's property
- Harm to your charity's work, beneficiaries or reputation²⁰

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and/ or isolation.

Protection from Sexual Exploitation and Abuse (PSEA)

¹⁸ Anti-Slavery International (2020) is in the process of reviewing and updating the policies associated with the Safeguarding Policy. *Communications Policy, Safer Recruitment Policy and Staff Wellbeing Policy* are either under review or in development.

¹⁹ Plan International, *Global Policy: safeguarding children and young people*, 2019, <https://plan-international.org/publications/global-policy-safeguarding-children-and-young-people>.

²⁰ Definition taken from UK Charity Commission.

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Safeguarding

Safeguarding means taking all reasonable steps to prevent the violation of people's human rights, particularly in terms of sexual exploitation, abuse, and harassment; especially vulnerable adults and children; and to respond appropriately when harm does occur. Safeguarding applies consistently and without exception across all programmes, partners, and representatives. It requires proactively identifying, preventing, and guarding against all risks of harm, exploitation and abuse and having mature, accountable, and transparent systems for response, reporting, and learning when risks materialize. Those systems must be survivor-centered and protect those accused until proven guilty. Safeguarding puts beneficiaries and affected persons at the center of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience, and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Vulnerable adult

Sometimes also referred to as an at-risk adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. A person in a weakened position of power due to their socio-economic status.

Young person

Includes individuals between the ages of 15 to 24 years old in accordance with the UN General Assembly's resolution 36/28 of 1981.

Annex 1: Safeguarding Concern Reporting (SCR) Form

To be completed by the Anti-Slavery International Safeguarding Manager with support of person reporting who will need to provide details of the concern.

Name of Person Reporting:

Position at Anti-Slavery International:

Date of Report:

Email address:

Telephone number:

Name of individual(s) you are concerned about (this form can be completed in relation to a concern that you suspected or witnessed, or a concern that someone else has suspected or witnessed). The text box expands automatically as you continue typing.

Date/time/place incident occurred:

The text box expands automatically as you continue typing.

Nature of concern, or incident:

The text box expands automatically as you continue typing.

Information on alleged perpetrator – is he or she connected to Anti-Slavery International in any way?

The text box expands automatically as you continue typing.

What did you witness or what have you been told? By whom, and when? Please provide a clear description and if appropriate, use the words of the person reporting the situation to you. The text box expands automatically as you continue typing.

Has a child, young person or adult been harmed or been placed at risk of harm? Please provide details. The text box expands automatically as you continue typing.

How is the individual connected to Anti-Slavery International?

The text box expands automatically as you continue typing.

Have you reported this situation to the local authorities and has any action been taken?

The text box expands automatically as you continue typing.

Have you spoken to anyone else about this incident, concern, allegation? If yes, who? The text box expands automatically as you continue typing.

Were there any other witnesses present when the incident occurred? Who? The text box expands automatically as you continue typing.

What actions have been taken to address this situation thus far by Anti-Slavery International staff and others? The text box expands automatically as you continue typing.

What actions would you suggest that Anti-Slavery International take to respond to this situation? The text box expands automatically as you continue typing.

Date and time this form was completed:

Signature of Safeguarding Manager:

***Signature of Person Reporting
Concluding Remarks***

How was the incident, allegation, concern concluded? Please provide names and email addresses of persons contacted. Has the case been closed or is it on going?

The text box expands automatically as you continue typing.

Date of concluding remarks:

Signature of Safeguarding Manager:

Further comments, remarks and/or learning to be inserted below.

The text box expands automatically as you continue typing.

Annex 2: Informed Consent Form for Interviews, Photography and Media

My name is _____. I confirm that I am willing for to participate in talking to a person or a group of people from an organisation called **Anti-Slavery International**.

They may ask me about my experiences and feelings about my life and I am willing to answer their questions if I feel comfortable to do so. I know that this person/group of people will record my story in writing and/or using a voice recorder. I also understand they might take photographs of me and record video footage. I am happy for them to do this and I understand I can change my mind and stop the interview or recording or ask for my photos to be deleted if I feel uncomfortable at any time.

I understand that this written or recorded story, or any photograph or video footage they take, may be used by **Anti-Slavery International**, media outlets or partner and other organisations **Anti-Slavery International** works closely with, for public purposes such as:

- In local and international newspapers and media outlets, publications, and books.
- On radio and national television stations
- Online through websites and social media platforms
- In reports or publicly available research papers

I confirm I have been shown examples of how my story or image could be used.

I understand I can ask this person/group of people to give me or show me a copy of any written or visual recordings they make and that I have the right to see how my images or stories are used before publication.

I know I can change my mind after being interviewed or photographed and if I do not want my story or images to be shared that I can withdraw my consent at any time. If I want to withdraw consent I can contact consent@antislavery.org

I also know that I can tell this person/group of people not to use my real name or even show my face when telling my story to other people. This means that no one will be able to identify me telling this story afterwards.

I know that there is no promise of any money or reward to be given to me. I am the one who has decided to allow or not to allow this person/group of people to talk to me.

*I _____ have read and/or had the conditions explained to me, and consent to **Anti-Slavery International** obtaining information, photographing or videoing me in line with these arrangements.*

Name: _____ Signature: _____

Please give details below of special requests made by the participant: _____

Conditions of use by Anti-Slavery International

1. This form is valid for **five years** from the date you sign it; the consent will automatically expire after this time. We will then archive images/videos etc. unless we are able to obtain your consent to continue to use the materials.
2. We, **Anti-Slavery International**, will not use the personal details or full names (which means first name and surname) of any child, young person, or adult in a photographic image, on video, on our website, in any of our other printed publications.
3. We will not include personal e-mail or postal addresses, or telephone or contact numbers on video, or in any other way include identifying information that may disclose locations, on our website, in our printed publications. .
4. If at any time you wish to withdraw your consent, please contact consent@antislavery.org