



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

Revisions

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pp.1 'Contact Details' - removed Safeguarding Manager and added Safeguarding Focal Leads

pp.26 - Added 'Pre-concern' section and link to relevant policy

pp. 13 - Added 'Trauma-informed approaches to participation' section and links to resources

pp.17 – Added '6.3.1 Safeguarding risk matrix'

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1. Purpose

This policy aims to protect vulnerable individuals, including children and adults at risk, from harm that may be caused by Anti-Slavery International's activities (through design or implementation) or contact with its representatives. It outlines both organisational and individual responsibilities for safeguarding and applies to all representatives who must sign adherence to this policy and the Anti-Slavery International Code of Conduct.

This policy 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; these guidelines are to be interpreted in the spirit of common sense with the best interests of the child, young person, or adult at risk as the primary consideration. This policy is not intended to replace the seeking of expert advice when necessary.

1.1. Policy review

The guidelines and procedures contained within this policy will be reviewed by the Safeguarding focal lead(s) and the Nominated Trustee for Safeguarding annually. 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.

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 focal lead(s), Senior Management Team, or the Nominated Trustee for Safeguarding.

2. Statement of ASI responsibility for safeguarding

Anti-Slavery International's Safeguarding Children and Adults at Risk Policy sets out our intent and responsibility to Do No Harm to those who come into contact with our programmes, staff and representatives. ASI's internal policies, including the Code of Conduct, Recruitment Policy, Security Manual and Whistleblowing Policy stipulate the Safeguarding responsibilities of and to staff.

Our responsibilities for safeguarding when working in partnership are:

- To conduct due diligence processes which explore partner organisations' existing Safeguarding provisions, risks and gaps.
- To carry out thorough and fair go/no-go decision making to ensure the suitability of prospective partner organisations and project concepts

- To co-develop project/activity risk assessments during project development to ensure minimum standards and capacity strengthening offer are fit for purpose.
- To set out minimum safeguarding standards for partnership, and agree adherence to a commitment to these with partner organisations through contracts (in place or to be developed)
- To agree and deliver capacity strengthening support needed to meet and implement minimum standards.
- To ensure a regular review of how minimum standards are working, as part of wider partnership review meetings, including reviewing any safeguarding concerns or issues raised during the review period.
- Where issues of concern emerge or are brought to our attention: To ask questions, seek further information, provide advice, and monitor implementation of responses and agreed actions.
- To develop and implement exit strategies in the event of serious Safeguarding or other contractual breaches.
- To understand and operate within applicable legal frameworks with a willingness to utilise whistleblowing channels and other reporting to statutory authorities as necessary.

Our accountability for safeguarding when working in partnership is:

- Demonstrating that we have fulfilled the responsibilities outlined above: That we have agreed minimum standards with partners and supported them to implement those; and that we have responded to any safeguarding issues or concerns with appropriate advice and support to help the partner organisation to take effective action.

Beyond the safeguarding responsibilities and accountability outlined above, we also seek to influence partner organisations' understanding of issues underpinning safeguarding risks; the introduction and embedding of 'safe' organisational culture; and the development of 'promising practice' in relation to safeguarding (i.e. going further than minimum standards).

3. What is safeguarding?

In the UK, safeguarding means taking all reasonable steps in protecting the health, wellbeing, and human rights of children and adults at risk¹, and enabling them to live free from harm, abuse, and neglect.²

In the international non-government organisation (INGO) sector we understand it to mean protecting people from harm that arises from coming into face-to-face, virtual, digital, and phone contact with our staff, representatives or programmes.³ At Anti-Slavery International,

¹ <https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms#2. adult at risk>

² <https://www.scie.org.uk/safeguarding/adults/introduction/what-is>

³ <https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms>

as a human rights organisation this is of paramount importance as our work seeks to support those affected by slavery in all its forms, who are some of the most at-risk people in global society. 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 at risk.

3.1. Safeguarding children, young people and adults at risk can be collectively defined as:

- Preventing harm or abuse that arises because of Anti-Slavery International's representatives, programmes, or operations.
- Taking action to enable all children, young people and adults at risk to have the best outcomes from their involvement with Anti-Slavery International.
- Ensuring that our actions concerning the wellbeing of children, young people and adults at risk is guided, where appropriate, by their views, wishes, feelings and beliefs.

3.2. The following principles underpin all safeguarding practices at Anti-Slavery International:

- Everyone has equal rights to protection from harm.
- Anti-Slavery International and its implementing partners⁴ 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 adults at risk, 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 adults at risk.
- Donors place a responsibility on Anti-Slavery International to set safeguarding standards for partner organisations⁵ and support them to meet those standards.
- The best interests of the child, young person and adult at risk must be the paramount consideration when taking actions to safeguard them.

3.3. Definitions

See [9. Glossary of Terms](#) for definitions of child, young person and adult at risk.

⁴ 9: Glossary of terms

⁵ Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH) Due Diligence Guidance for FCDO implementing partners - GOV.UK (www.gov.uk)

3.4. Assessing capacity

To ensure Anti-Slavery International representatives are always acting in the best interest of an adult at risk, there may be the need to formulate a mental capacity assessment⁶ to determine the person's ability to make decisions about their care or safety. A mental capacity assessment is designed specifically to empower and protect an individual who may be unable to make a decision because of mental an impairment of the mind or brain, or physical impairment, any of which may be temporary or permanent. Before making any decision on behalf of an adult, representatives must assume mental capacity. To assess mental capacity, representatives should follow the guidance in [Annex 1](#).

4. Responsibilities

4.1. Equity, Diversity and Inclusion (EDI)

ASI is committed to fostering a culture of equity, diversity, and inclusion, recognising that every individual deserves to be treated with dignity and respect. We understand that to effectively combat slavery and exploitation, we must not only recognise and acknowledge that individuals from diverse backgrounds may face unique barriers in having their needs met and may be at a higher risk of abuse and exploitation due to their identity, but also actively work to dismantle those barriers internally and within our partnerships. EDI principles and practices are fundamentally intertwined in our safeguarding approach to ensure that there is equitable access to protection.

4.2. EDI within our workplace

- Our current policies and practices strictly prohibit discrimination within our workplace and in the work that we do, based on any characteristic, including but not limited to race, gender, religion, disability, sexual orientation, or age. We foster an environment where everyone feels safe, respected, and valued.
- We are committed to ensuring that our staff members are culturally competent and sensitive to the unique needs of diverse groups. This includes understanding cultural norms, religious practices, and the impact of discrimination on individuals from various backgrounds.
- We are committed to ongoing education and self-improvement regarding EDI issues. Our organisation regularly reviews and updates its policies and practices to ensure they remain aligned with the evolving understanding of EDI and safeguarding.

⁶ MCA: Assessing capacity | SCIE

See [4.5.1 Working in Partnership](#) for further information on how we incorporate EDI principles into our partnership work.

4.3. Anti-Slavery Internationals Representatives include:

- | | | |
|---------------------------|----------------|------------------------|
| i) board members/trustees | iv) volunteers | vi) programme visitors |
| ii) staff including | v) contractors | including: |
| volunteers/interns | | - journalists |
| iii) consultants | | - celebrities |
| | | - politicians |

The actions of the above-named 'Representatives' must be consistent with the principles outlined above, and those laid out in the Anti-Slavery International Code of Conduct. Failure to comply with this policy could result in the immediate termination of contractual or other agreements with Anti-Slavery International.

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.

4.4. Accountability

Whilst safeguarding is the responsibility of every representative of Anti-Slavery International, there are specific roles with leadership and professional responsibility. The specific responsibilities of each of the below roles are set out in [Annexe 2](#).

4.4.1. Board of Trustees

Leadership responsibility for safeguarding lies with the Anti-Slavery International Board of Trustees, though actions related to safeguarding are delegated. The Board of Trustees should appoint a lead Safeguarding Trustee as the board's named expert on safeguarding to support, advise, and guide the board and staff members on safeguarding issues. However, safeguarding remains a shared responsibility of all trustees.

4.4.2. Chief Executive Officer and Senior Management Team

The Director of Advocacy and Programmes is currently the designated Safeguarding Lead within the Senior Management Team. **Professional responsibility** for safeguarding sits with the Chief Executive Officer and the Senior Management Team.

4.4.3. Safeguarding focal lead(s)

The Safeguarding focal lead(s) holds professional responsibility for the development and implementation of all safeguarding frameworks at Anti-Slavery International.

4.4.4. Programme Managers and Policy Managers

Additional professional responsibility lies with Programme and Policy Managers for safeguarding issues within the projects they are overseeing.

4.4.5. Fundraising and Communication Roles

It is the responsibility of the fundraising and communications team to stay up to date with the guiding principles set out by the Chartered Institute of Fundraising⁷, and specifically the guidance on fundraising people in vulnerable circumstances⁸.

4.4.6. Representing beneficiaries in communications

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 accurately representative of the issue being communicated and will choose stock images carefully.
- Tag and store images according to the level of personal information visible in the images, keeping records of consent confirmation and “retiring” photos from use as the consent period expires.
- Select text that accurately represents a person’s story and the context within which they framed it. Be careful to avoid sensationalist language and use quotes out of context.
- Respect all represented person’s right to privacy through a clear schedule of consents which are detailed enough to tell us where they want privacy and where they do not, granting autonomy for anonymity and keeping data securely.
- Respect all represented person’s dignity through granting autonomy to choose how they are represented¹⁰
- Use the Anti-Slavery International guidance on ethical photo and story collection informed by the People in the Pictures research. Ensure that co-creation with person whose story is being told, participation in its collection, and informed consent prior to any photo and story use.

⁷ Chartered Institute of Fundraising - Safe and supportive working culture ([ciof.org.uk](https://www.ciof.org.uk))

⁸ Chartered Institute of Fundraising - Treating donors fairly ([ciof.org.uk](https://www.ciof.org.uk))

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

¹⁰ Brief for visual content - Anti-Slavery International.docx (sharepoint.com)

- Ensure [Consent forms](#) and sensitive beneficiary data are stored securely by the Communications Team in line with the Anti-Slavery International Communications Policy and UK GDPR¹¹)
- In the event of a Safeguarding Incident (ASI or otherwise) that may be of interest to the media (due to the profile of the perpetrator or otherwise) it is the responsibility of the Director of Fundraising and Communications, alongside the Safeguarding focal lead(s) 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.
- Respond to safeguarding concerns that may be raised through our social media channels, emails, and media phone, and advise the Safeguarding focal lead(s) as per detailed procedures in this Policy.

4.4.7. Implementing Partner Organisations

This policy does not apply directly to organisations that Anti-Slavery International funds, supports and/or otherwise aligns with. If an implementing partner does not yet have their own safeguarding policies and procedures in place, Anti-Slavery International will provide a Safeguarding Policy template that should be adopted in the interim which reflects the principles set out herein.

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 focal lead(s) will support Programme Managers, Policy Managers, relevant representatives and Anti-Slavery International (ASI) implementing partners to develop the above. The support 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.

¹¹ <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

4.5. Working in partnership

Anti-Slavery International proactively supports our partner organisations to effectively safeguard adults at risk, young people, and children, and adheres to specific safeguarding requirements embedded in our Partnership Agreements 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. These principles are aligned with the UN Convention on the Rights of the Child (UNCRC).¹²

- **Everyone** has responsibility for safeguarding.
- Do no harm.
- Act with integrity, be transparent and accountable.
- All activity is done in the best interests of the child/adult at risk.
- 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 adults in the community who are not direct beneficiaries but may be vulnerable to abuse.
- A child is defined as someone under the age of 18 regardless of the age of majority/consent in country.
- All children and adults shall be treated equally, irrespective of race, gender, religion/or none, sexual orientation, or disability.
- Organisations that work with children and adults at risk should apply a safeguarding lens to their promotional communications and fundraising activities to protect the interests of those people.

4.5.1. Equity, diversity and inclusion in partnership

Working in diverse global contexts, we acknowledge that some regions may have deeply ingrained cultural, legal, and religious frameworks that actively discriminate against and oppress certain groups. To navigate this, we collaborate closely with partner organisations that share our inclusive values and rights-based approach, and we work collaboratively to identify any differences in our attitudes or values related to EDI. This process helps us ensure that we do not inadvertently contribute to discrimination, prejudice, inequity, or oppression through our partnerships, advocacy efforts, or project work.

We recognise that our partners may face additional challenges in ensuring equitable access to project work due to local cultural norms or legal constraints and we acknowledge that

¹² <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>

certain groups, such as individuals from marginalised communities, women and girls, refugees, or those with disabilities, may encounter barriers in accessing the work we do in partnership, in the UK and internationally, and may be at a higher risk of abuse and exploitation due to their identity. To address this, we encourage our partner organisations to assess barriers and vulnerabilities, to identify those at risk of exclusion, and to provide measures to increase their access to our work and feedback mechanisms.

Achieving effective EDI necessitates a deep understanding of the diverse communities we serve. We are committed to collaborative and participatory approaches which help to build this understanding by drawing on the expertise, knowledge, and experiences of our partner organisations, who are embedded within their communities. We strive to uphold global standards for inclusion, while recognising that some adaptations may be necessary to reflect local practices and standards, but at all times we work with partners to prioritise safety and well-being while respecting the autonomy of local communities and organisations.

4.6. Trauma-informed approaches to participation

A trauma-informed approach ensures that individuals affected by slavery and slavery-like practices are engaged directly with Anti-Slavery International, or through our partner organisations, in ways that actively prioritise their safety, dignity, and well-being, while seeking reducing the risk of re-traumatisation. By adopting TIA, our safeguarding framework is strengthened through seeking to ensure that participatory processes do not inadvertently cause harm and instead foster meaningful, empowering, and ethical engagement.

4.6.1. Implementation

The practical application of trauma-informed approaches is fully detailed in [ASI's Internal Guidelines for Supporting Trauma-Informed Approaches in Participation](#) and the accompanying [Partner Organisation Toolkit](#). To avoid duplication and ensure consistency, staff and partners are directed to these resources for detailed guidance. They provide comprehensive information, resources and tools to support the integration of trauma-informed approaches across the participatory activity cycle. Key considerations include:

1. Planning stage:

- Using trauma-sensitive methodologies to ensure that activities are safe and inclusive.
- Conducting risk assessments and participant safety mapping to identify potential hazards and mitigation strategies.

2. During engagement:

- Facilitating safe spaces where participants feel respected, heard, and have agency.
- Ensuring facilitators are trained in trauma-sensitive practices and can respond appropriately to participant needs.

3. Post-engagement:

- Co-designing feedback mechanisms with participants to maintain transparency and accountability.
- Revisiting consent regularly, ensuring participants are informed of how their contributions will be used over time.

5. 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 including volunteers and interns** – disciplinary action and/or dismissal (informed decision to be made by Human Resources Manager)
- **Trustees** – termination of Board membership, reporting to Charity Commission
- **Consultants, trainers, or sub-contractors** – termination of contract and any necessary reporting
- **National partners** – withdrawal of funding and/or ending of relationship with Anti-Slavery International
- **Organisation** - Fundraising regulator investigation, ICO investigation
- **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**.

See Flowcharts **8.1.1, 8.1.2, 8.1.3 and 8.1.4** (pages 26-29 of this policy) for Anti-Slavery International's Safeguarding Reporting Procedures.

6. Pillar 1: Prevention

6.1. 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. For example, in some places abuse or exploitation of certain groups of children, 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.

These types of norms can mean that:

- Children, young people, or adults at risk are more vulnerable to abuse, including by international and/or local/national NGO staff, volunteers, partners, suppliers 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. For example, assuming a level of understanding of the consent and what an image or story would be used for.
- 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.

See [Annex 3](#)¹³ for a list of contextual and specific risk factors that can increase the risk profile of Anti-slavery International.

¹³ Annex 2: Risk factors

6.2. 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 adult at risks 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 adult at risks, 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.

There might be some circumstances e.g. an apparent life or death issue, in which the abuse of children, young people, and adults might not be prioritised. Nevertheless, all cases of known, disclosed or suspected abuse must be reported following the reporting flow charts. If in doubt, revert to the Safeguarding focal lead(s) for specific advice on the need to deprioritise your concern.

6.3. Risk Management

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

Anti-Slavery International prevents the abuse of children, young people, and adult at risks 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 adult at risks must be risk assessed, preferably at the design or applications stage before implementation.

Before starting work with a new partner, the project lead and the safeguarding focal lead(s) 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.

Risks identified should, where possible, be mitigated by appropriate measures. It may be the case that not all risks can be mitigated. 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 make a justified decision on the suitability of the initiative.

6.3.1. Safeguarding risk matrix

To support our risk management approach, ASI maintains a Safeguarding Risk Matrix. This tool is updated quarterly by safeguarding focal leads, capturing emerging risks across programmes, projects, and other organisational operations. The matrix enables the safeguarding team to:

- Monitor changes in safeguarding risks over time
- Evaluate the effectiveness of mitigation measures
- Ensure risks are appropriately categorised (low, medium, high) and prioritised for action.

The Safeguarding Risk Matrix is shared with the Board of Trustees quarterly to ensure high-level oversight and accountability as part of their role in effective safeguarding governance.

6.4. Recruitment and Engagement

6.4.1. Recruiting staff

Anti-Slavery International strives to uphold the highest standards in its recruitment procedures. We achieve this through:

- 1) stating that a DBS check may be required in all job descriptions and recruitment posts when advertised (paid and voluntary)¹⁴

¹⁴ <https://www.gov.uk/find-out-dbs-check>

- 2) including a 'safer recruitment statement' on all recruitment profiles which makes clear the high standards of safeguarding the organisation adheres to
- 3) carefully following 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 adult at risks, children or sensitive safeguarding information will be risk assessed by the hiring manager and Safeguarding focal lead(s) and a basic DBS check may be requested from the employee. Where neither DBS nor police checks are possible, more rigorous references will be obtained.*

Anti-Slavery International is an equal opportunities employer under the UK Equality Act (2010)¹⁵. In line with the Police Act 1997¹⁶, Anti-Slavery will not discriminate unfairly against any subject of a criminal record check based on a conviction or other information revealed. Anti-Slavery International recognises that victims of modern slavery may have a criminal record relating to their exploitation, Anti-Slavery International will not discriminate unfairly. Applicants with lived experience of modern slavery are strongly encouraged to apply to any role at Anti-Slavery International.

6.4.2. Engaging consultants

When entering a contract with a consultant who may have access to children, adult at risks, and/ or sensitive data the Safeguarding focal lead(s) at Anti-Slavery International will provide a safeguarding briefing before any work commences. The hiring manager is responsible for arranging this. 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 and the Safeguarding Brief for Consultants and must adhere to all safeguarding principles. ID checks are also carried out. During any field or partner visits that involve direct work with children and adult at risks all consultants including photographers, should be accompanied by an Anti-Slavery International paid staff member or paid staff member of an implementing partner organisation.

6.4.3. Engaging implementing partners working with children, young people, or adult at risks

If an implementing partner will be working directly with children, young people or adult at risks, before entering into any contractual agreements with them including memorandums of understanding, a safeguarding due diligence check must be carried. All formal partnership agreements must also include safeguarding clauses which require partners to maintain a

¹⁵ <https://www.gov.uk/employer-preventing-discrimination>

¹⁶ [Police Act 1997 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1997/23)

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.

6.4.4. Education and training

All representatives of Anti-Slavery International will receive an induction to safeguarding within one month of joining. 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 as a statement of their adherence. All representatives will be required to re-sign annually to ensure any changes to the policies are incorporated into organisational and individual working practices.

Anti-Slavery International Safeguarding focal lead(s), Senior Management Team 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.

6.5. Staff Behavioural Responsibilities

6.5.1. Child Safeguarding

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

- Travel or be alone with a child not under their legal care.
- 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.

6.5.2. Adult Safeguarding

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

- Promise confidentiality to an adult.
- Sexually abuse or exploit adult at risks.
- Subject a adult at risk 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.

6.5.3. 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 focal lead(s), 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.

6.5.4. Communications and Social Media

Representatives of Anti-Slavery International must refer to Freedom United dignity pledge¹⁷ guidelines when undertaking any communications activities with children, young people, or adults at risks, and must operate in accordance with this Safeguarding Policy and adhere to the safeguarding principles herein.

6.5.5. Informed Consent for All Assets

Engaging children, young people, and/or adult at risks 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 adult at risk 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 so¹⁸

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.

¹⁷ <https://cdns.freedomunited.org/wp-content/uploads/2020/01/30131143/My-Story-My-Dignity.pdf>

¹⁸ [bond-ethical-guidelines-for-collection-and-use-of-content.pdf](#)

An individual may withdraw their consent at any time by emailing consent@antislavery.org detailing their intent to withdraw consent, or by speaking to a member of Anti-Slavery International or partner organisation. This inbox is monitored by the Safeguarding focal lead(s), and any requests for withdrawn consent will be managed in conjunction with the Communications Manager.

6.5.6. Own social media

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

6.5.7. 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 adult at risks, children, or young people. Once completed, the risk assessment must then be sent to the Safeguarding focal lead(s) 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 adult at risks, 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

7. Pillar 2: Reporting

7.1. 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 focal lead(s) within 24 hours. The Safeguarding focal lead(s) will then complete a **Safeguarding Concern Reporting (SCR) Form** (*Annex 1*) for information recording purposes.

On the Safeguarding focal lead(s)'s professional judgement, cases which pose harm to children, young people, and adult at risks, 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 focal lead(s), then staff must submit the report directly to the Director of Advocacy and Programmes and/or CEO. It is the responsibility of Safeguarding focal lead(s), 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 adult at risks 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 legislation¹⁹ 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

7.2. Disclosures

7.2.1. 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:

¹⁹ <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

LISTEN

- Stay calm, listen carefully.
- Show acceptance of what the person is saying.
- Let the person tell his or her whole story, only ask questions for clarity – **do not** try to investigate.
- 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.
- Be aware that the person may have been threatened or bribed not to tell anyone.

CLARIFY

- 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.

REASSURE

- Reassure the person that telling someone about it was the right thing to do, for example “Thank you for telling me, you were right to raise it or “I can help to raise this with the right people to help you.”
- Never promise to keep the disclosure a secret but **do** assure the person that you will treat the information sensitively.

ASK

- 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.
- If the person is an adult, ask their permission to share the concern/disclosure with the Safeguarding focal lead(s). If the person is a child, then you do not need their consent to report.

INFORM

- 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.

- Inform **yourself** about local legislation as this may determine actions such as who you are permitted to share information with²⁰.

RECORD

- **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.

REPORT

- **Do not** permit personal doubt to prevent you from reporting the allegation
- Immediately contact the Safeguarding focal lead(s)
- Consider your own feelings and seek support if needed.

7.2.2. Concerns or disclosures reported via Social Media, email or phone

If a 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.
- **Do** respond to all concerns within 24 hours, acknowledge receipt, and inform the Safeguarding focal lead(s). All information must be recorded using the **Safeguarding Concern Reporting (SCR) Form (Annex 1)** completed by the Safeguarding focal lead(s) and stored securely.
- **Do not** promise to keep what they have told you secret.
- **Do** 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.
- **Do** treat all parties with the same respect and procedure, and **do not** discriminate.
- **Do** 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.

²⁰ 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.

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.

7.2.3. External Safeguarding Concerns about people not affiliated with ASI

Representatives of Anti-Slavery International may receive reports or safeguarding concerns about people who are not affiliated with the organisation and who are based within or outside of the UK.

If you receive a concern about an individual who is not supported by or affiliated to Anti-Slavery International, who resides or is currently located within the UK, you must signpost them to the Modern Slavery Helpline for support as the first point of contact. If appropriate, you may also signpost them to partner organisations through the Anti-Trafficking Monitoring Group (ATMG).

If a concern is received about an individual residing in a country or region where ASI has a partner organisation, it may be appropriate to signpost the individual to this organisation, or to put them in direct contact.

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 8.2.2 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 focal lead(s) 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 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 focal lead(s) updated at each stage.

7.2.4. 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 adult at risks 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 focal lead(s).

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.

7.3. Pre-concerns

[Anti-Slavery International's Safeguarding Queries and Pre-Concern Policy 2025](#) establishes an additional, proactive mechanism for addressing low-level concerns and safeguarding queries that may not meet the formal threshold for a reportable safeguarding concern. The purpose of this mechanism is to support a culture of openness and continuous improvement while preventing escalation into more serious safeguarding issues. Safeguarding pre-concerns will be included in annual refresher training for Anti-Slavery International employees and volunteers.

7.3.1. Definition

A pre-concern is any issue, practice, or behaviour that may indicate potential safeguarding risks if left unaddressed. It does not meet the formal reporting threshold but warrants proactive discussion and action. For example:

- Minor breaches of the Code of Conduct, such as unprofessional comments.
- Situations where cultural practices appear to conflict with safeguarding principles.

7.3.2. Raising a pre-concern

Pre-concerns can be raised via email, Teams, or in person with a safeguarding lead. Issues will be logged confidentially and discussed with the reporting individual to explore potential risks, mitigation steps, and further actions if necessary. Potential further actions are outlined in the pre-concern policy, to support safeguarding focal leads in responding to pre-concerns.

7.3.3. Escalation and documentation

If a pre-concern escalates into a formal safeguarding concern, the issue will be managed in accordance with ASI's Safeguarding Policy. All pre-concerns will be documented in the safeguarding log and reviewed during safeguarding audits to ensure early interventions are effective.

8. Pillar 3: Response

8.1. 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 adult at risk 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 focal lead(s) 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 focal lead(s).

See Flowcharts **8.1.1, 8.1.2, 8.1.3 and 8.1.4** (pages 26-29 of this policy) for Anti-Slavery International's Safeguarding Reporting Procedures.

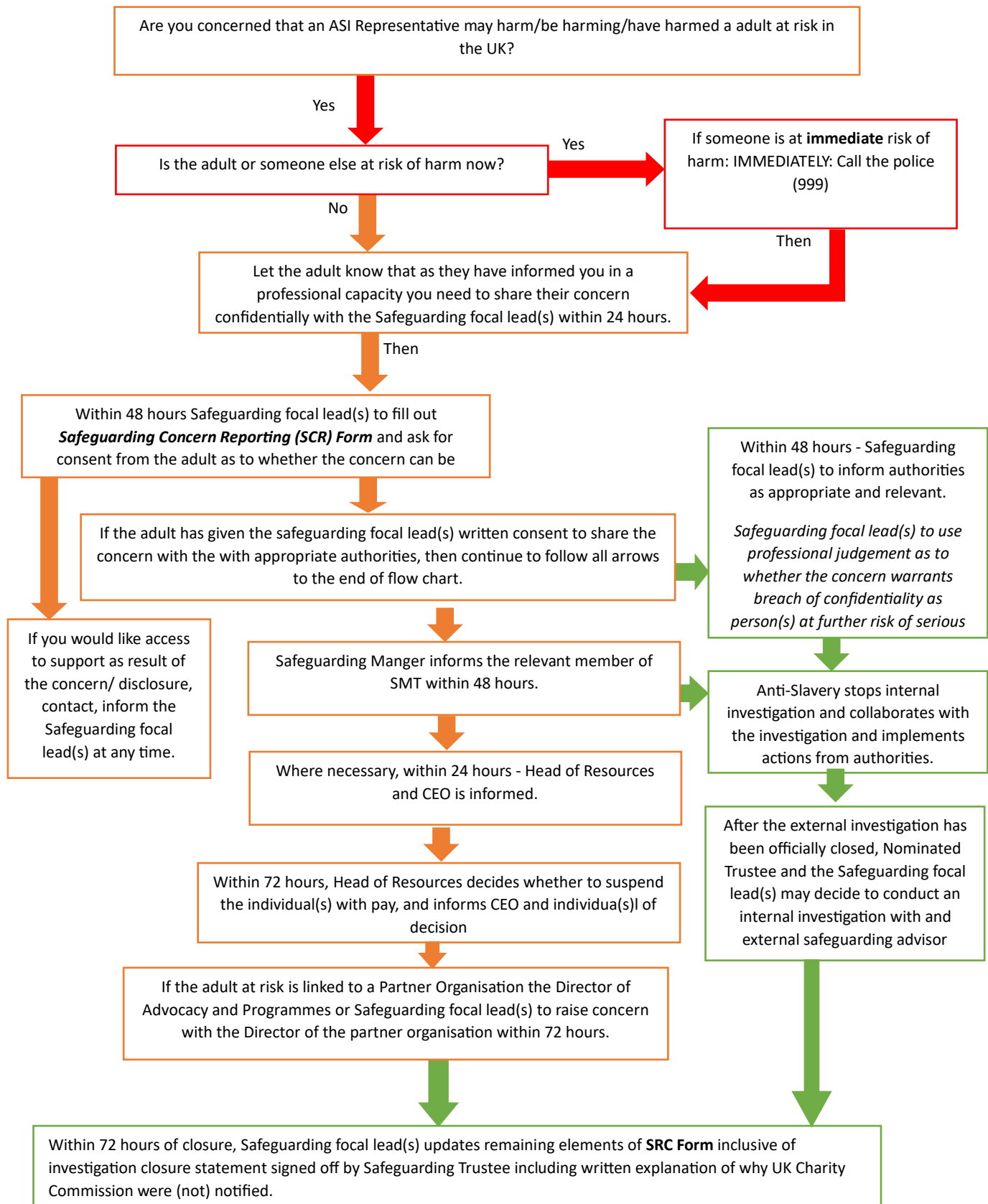
8.2. Enabling reports

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.

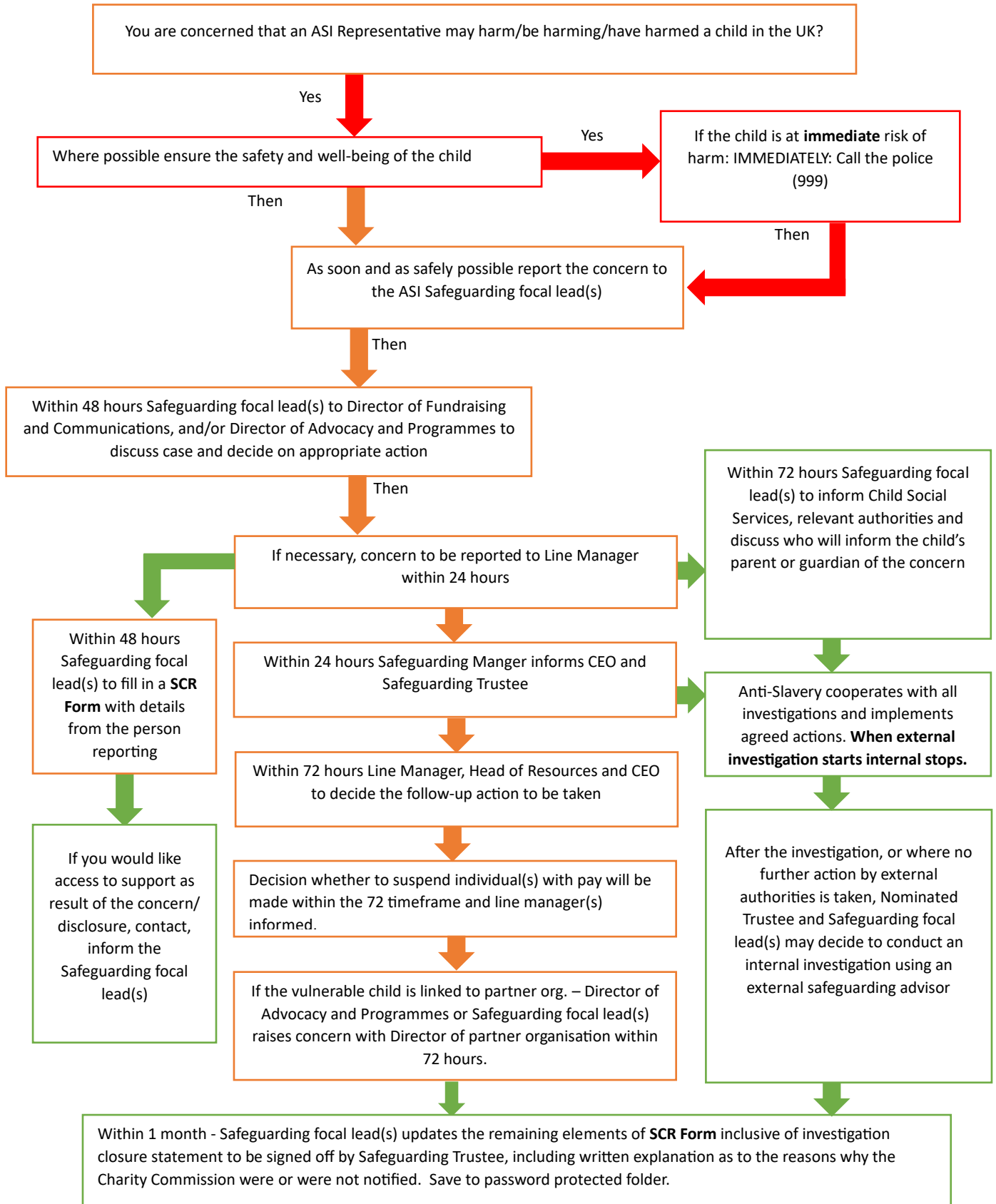
Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Anti-Slavery International's Whistleblowing Policy.

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 focal lead(s) as per the reporting procedures.

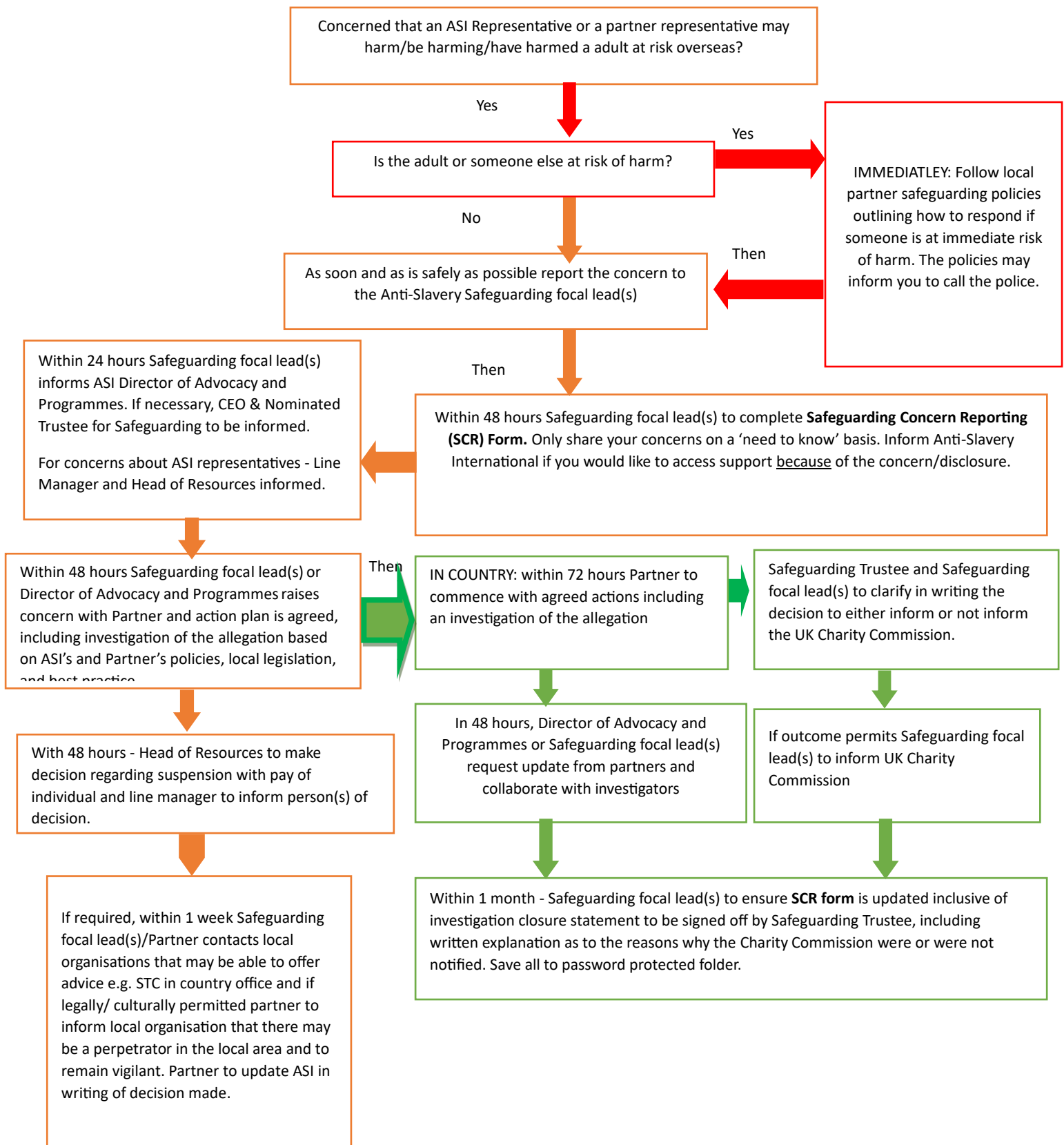
8.2.1 Safeguarding adults inside the UK



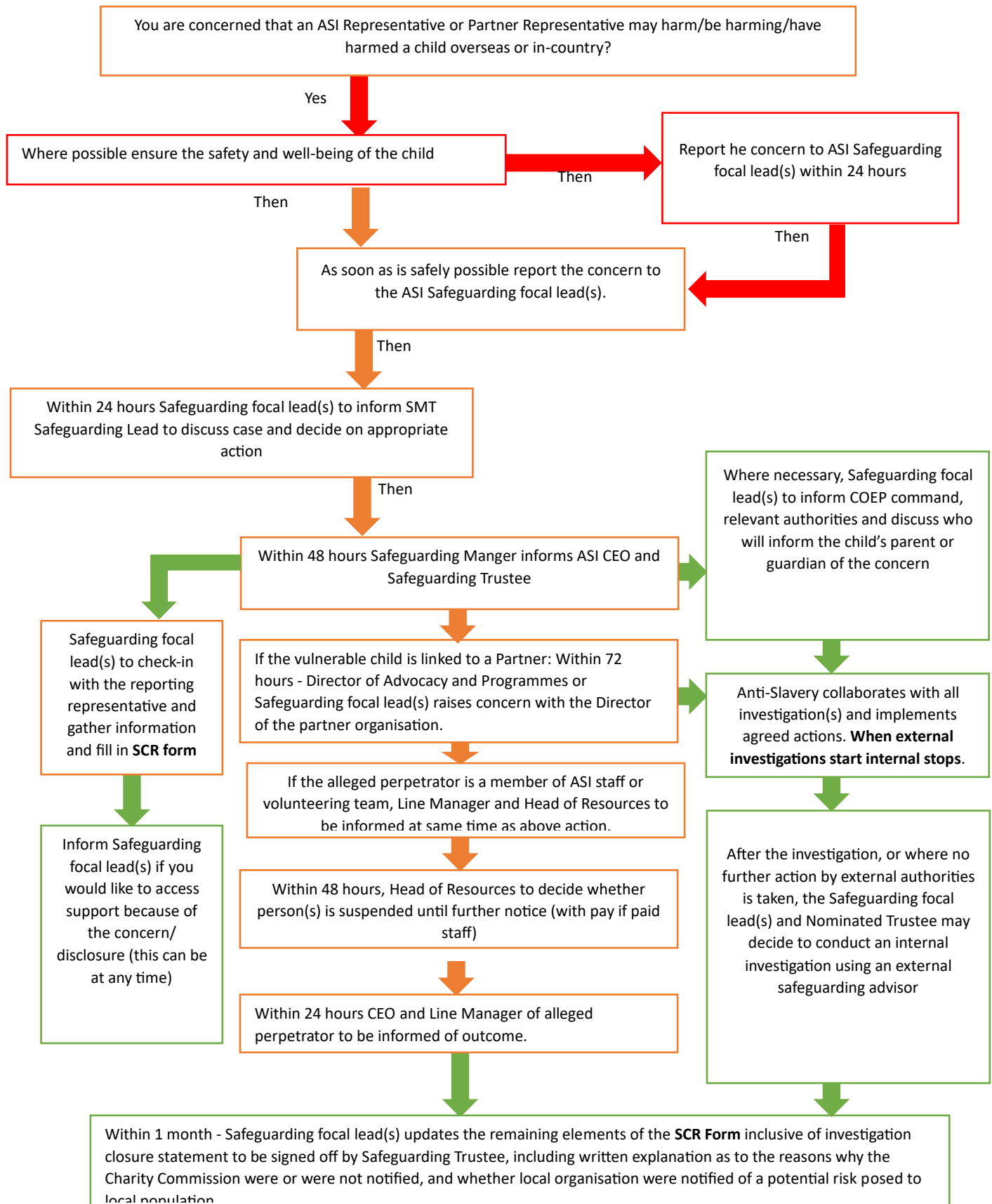
8.2.2 Safeguarding children inside the UK



8.2.3 Safeguarding adults outside of the UK



8.2.4 Safeguarding children outside the UK



9. Safeguarding Framework

Within the Anti-Slavery International shared drive, central folder, you can find the [Safeguarding Framework](#) folder.

9.1. What is included in the Safeguarding Framework?

- Current Safeguarding Policy
- Safeguarding Audit
- Duty of Care Protocol Template
- Partner Risk Assessment Template
- Partner Safeguarding Concern Reporting Form
- Safeguarding Concerns
- Recruitment
- Working with Survivors
- Safeguarding Brief for Consultants

9.2. Associated policies

- Code of Conduct
- Data Protection Policy
- Dignity at Work (Anti-Bullying and Harassment) Policy
- Whistleblowing Policy
- Recruitment Policy
- Employee Handbook

9.3. Glossary of Terms

Adult at Risk

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 as they hold less power in society, are more dependent on others for survival, are less visible to relief workers, or are otherwise marginalised²¹. 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.

²¹ https://interagencystandingcommittee.org/system/files/psea-global_standard_operating_procedures_june_2016.pdf

There is no commonly agreed inter-agency criteria for who is at risk or ‘vulnerable’²²; this 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.

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

Anyone under the age of 18 years in accordance with Article 1 of UN Convention on the Rights of the Child (UNCRC) (1989).²³

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.²⁴

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 discrimination²⁵.

Harm

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

Implementing partners

Partners with whom we have a sub-contractual relationship with to implement a piece of work.

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

²² [Safeguarding definitions and reporting mechanisms for UK NGOs | Bond](#)

²³ <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

²⁴ <https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms#13. concern>

²⁵ Plan International, *Global Policy: safeguarding children and young people*, 2019, <https://plan-international.org/publications/global-policy-safeguarding-children-and-young-people>.

- Harm to your charity's work, beneficiaries, or reputation'²⁶

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)

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 adult at risks 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.²⁷

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.²⁸

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.²⁹

Survivor

²⁶ Definition taken from UK Charity Commission.

²⁷ https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms#33_safeguarding

²⁸ <https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms#SexualAbuse>

²⁹ <https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms#SexualExploitation>

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.³⁰

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.

³⁰ https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms#41_survivor

Annex 1: Assessing an adult's capacity to make decisions that affect them

The principles that we adhere to are formed from a mix of UK law and United Nations Conventions. While not all are legally binding around the world, these are the minimum standards upon which we have based our policy.

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

Five principles which underpin the Mental Capacity Act 2005³¹:

- i) You must always assume a person has capacity unless it is proved otherwise.
- ii) 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.
- iii) You must **not** assume incapacity simply because someone makes an unwise decision.
- iv) Always act, or decide, for a person without capacity in their best interests.
- v) 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.

³¹ [Mental Capacity Act 2005 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2005/9/section-1)

- 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.

Annex 2: Roles and responsibilities

A non-exhaustive list of responsibilities for roles which carry leadership and strategic responsibility for safeguarding at Anti-Slavery International

Board of Trustees

Trustees must³²:

- i) promote a positive and open working environment which recognises the implications of power and diversity in creating a culture for safeguarding
- ii) ensure that the organisation has appropriate safeguarding policies and procedures in place
- iii) encourage all staff to report concerns confidently.
- iv) identify potential risks and monitor how the organisation is creating a culture for safeguarding
- v) review ongoing compliance with international standards.³³

In accordance with the Safeguarding Trustee Job Description, the Safeguarding Trustee:

- i) meets with the Safeguarding focal lead(s) as necessary to discuss case management
- ii) acts as an independent resource when dealing with safeguarding reports
- iii) receives reports from staff and representatives in the event that the Chief Executive Officer, Senior Management Team Safeguarding Lead and/or Safeguarding focal lead(s) are implicated in an incident, or it is reasonably suspected that they are not managing an incident appropriately
- iv) with the support of all other trustees, reports serious safeguarding incidents to the Charity Commission and ensures other statutory bodies are informed as required, including the police. Failure to report may be deemed mismanagement, which could initiate regulatory action³⁴
- v) oversees the review of this policy
- vi) ensures quarterly reporting to the board occurs

If matters are not managed adequately, in the opinion of the Charity Commission³⁵, 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.³⁶

³² <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

³³ <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

³⁴ <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

³⁵ <https://www.gov.uk/government/collections/managing-your-charity-guidance>

³⁶ <https://bateswells.co.uk/updates/safeguarding-a-summary-for-charity-trustees/>

Chief Executive Officer and Senior Management Team

The CEO and SMT must:

- i) ensure that there is a strong culture of safeguarding
- ii) recognise the importance of diversity within the organisation
- iii) clearly articulate the behaviour expected of leadership and all those working within the organisation
- iv) recognise and reward practices and behaviour which safeguard children, young people, and adults at risk.

Safeguarding focal lead(s)

The Safeguarding focal lead(s) must:

- i) provide quarterly updates to the board, CEO, SMT and Safeguarding Trustee
- ii) ensure that all safeguarding policies, processes, and systems are operating effectively
- iii) ensure that all staff receive appropriate training commensurate with their roles

Programme Managers and Policy Managers

Programme and Policy Managers are responsible for:

- i) being accountable for ensuring that all representatives and partners connected with the projects are adhering to the safeguarding processes and following the safeguarding reporting procedures
- ii) working with the Safeguarding focal lead(s) at point of project proposal and during implementation to ensure safeguarding standards are considered and adhered to.

Annex 3: Risk factors

Contextual Risk Factors

The following (non-exhaustive) list details 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
- Lack of economic opportunities
- Prevalence of gender based and sexual violence
- High levels of human trafficking and/or modern slavery
- 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
- Weak, ineffective, or corrupt prosecution/justice systems
- Displacement within communities, or to Internally Displaced People or refugee camps
- The presence of international organisations such as peacekeeping missions
- 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

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 and behaviours 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 adult at risks
- 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 (monitoring, evaluation and learning, compliance, safeguarding)

Annex 4: Safeguarding Concern Reporting (SCR) Form

To be completed by the Anti-Slavery International Safeguarding focal lead(s) 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 focal lead(s):

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 focal lead(s):

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

The text box expands automatically as you continue typing.

Annex 5: 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
- For funding applications and donor reporting

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

Annex 6: Anti-Slavery International guidance on collecting photographs, film and stories

See live guidance here: [Anti-Slavery International guidance on collecting photographs, film and stories](#)

At Anti-Slavery International we take seriously the issue of survivor empowerment, voice and their participation in the strategic changes we aim to make. More than that there is an argument that people surviving, and vulnerable to, modern slavery should reclaim the agency that pushes for those changes.

With this in mind and with ASI's new 2020+ strategy, we have combined the consent-based principle of case studies and photo use with our strategic priorities to develop this guidance.

Background

In 2017 Jess Crombie and Siobhan Warrington developed the report *The People in the Pictures*³⁷, and subsequent white papers on 'reframing' the image of the project contributor ('beneficiaries') in the UK international development sector.

The research states the following:

- 1. The image and case study gathering process in itself should be an empowering activity.** In some cases the research found that inclusive, participatory and co-created processes for communications, such as writing, art, photography and relaying stories, led to the contributors feeling the benefit of this in their own recovery.
- 2. Images should not be viewed in isolation.** There has been a focus on analysis of imagery rather than other types of content. Such a focus can provide incomplete data as NGOs never present imagery alone, and the copy or surrounding materials in a piece of content, as well as the wider communications landscape into which it is presented, can entirely change the context of an image and therefore the response to that image.
- 3. Contributors are consumers.** There can be a tendency to assume that those who suffer, who feature in NGO content, are not also consumers of these communications. However, much of the research shows that contributors have a sophisticated understanding of the content-collection and generating process, indicating that they were regular consumers of these media, and demonstrated by empathy and sympathy for

³⁷ [bond-ethical-guidelines-for-collection-and-use-of-content.pdf](#)

those whose plights were depicted, responding to sad images the same way as do donors.

4. It is not a matter of mere sad vs happy imagery. The research was clear that for many contributors they wanted for the injustice that they experience to be told to others. Contributors do not 'like' sad images – because they empathise with the person in the image – but this preference for images that do not show suffering should not be misconstrued as contributors not wanting these images to be used at all.

5. Portrayal of suffering is not always problematic for the contributor. Contributors express a desire to have their voices heard, choose what stories are told and if possible, tell their own stories because, as the Niger proverb goes, “a song sounds sweeter from the author’s mouth”. But they also understand that NGO content has to reflect the reality of their situations, and that those stories need to generate an emotional response in donors, for example, that “happiness doesn’t move people”. These findings would seem to suggest that the outcome of a portrayal showing suffering is not always problematic for the contributor, but it must be remembered that the very reason these people are being surveyed is because they are in a moment in their lives where they are in need.

6. But it does need to be part of a holistic picture, over time. Most importantly, all studies agree that while contributors do not mind being shown in a position of need, they do not want that to be the only way that they were depicted.

7. Consent is not properly thought through. There is a widespread failure to ensure that contributors give their informed consent for their images and content to be used by NGOs, not because of lack of trying, but because a workable process has not yet been embedded. This represents a significant and urgent problem for the sector.

[8bc141_54dad1db30e440dbf99b056eedaf42a.pdf \(filesusr.com\)](https://filesusr.com/8bc141_54dad1db30e440dbf99b056eedaf42a.pdf) – one of six green papers.

Full report 2017 - [The People in the Pictures: Vital perspectives on Save the Children’s image making | Save the Children’s Resource Centre](#)

Anti-Slavery International guidance

When undertaking case study, photography and film collection for Anti-Slavery International, it must, where feasible, be approached as a co-created process with full and thorough involvement and clearly and continually evidenced informed consent from project participants.

When Anti-Slavery International staff, partners or associates are planning and implementing collection activities they should adhere to the following. Note this is not an exhaustive list and should trigger additional robust processes that ensure safe and effective image and story collection.

1. Invest in creative and collaborative approaches to image-making, e.g.:

- Enable contributors to become image-makers themselves. Self portraits, user-generated images and film, drawings, voices, song, collage. Design this into the communications project at the beginning.
- Invest in multiple stories over time with the same individuals in favour of one-time extractions. This can be difficult with short project cycles, and should be built into project design.
- Involve participants in the collecting of images. By providing access to digital images as they are taken – using a tablet or camera screen, participants can view how they have been captured in real time, and reflect on their usage with you.

2. Uphold contributors' rights and fulfil the duty of care.

Image and case study collection, and the process, should always reflect Anti-Slavery International's values and ensure the best interests of the contributor. There should be someone present whenever image gathering is taking place who is responsible for ensuring contributors are able to realise their rights to participation alongside their right to protection, and that filming or photography never furthers their vulnerability. This may be a local partner or staff member.

The responsible staff member should have the confidence and authority to stop or suggest changes to a photography or filming session in the unlikely event that they feel the well-being of a contributor is jeopardised as a consequence of image making.

Any relevant feedback on ASI (all of its work with the contributor), as well as particular concerns (and capacities) of the contributor, should be shared with the relevant team at ASI. See the Safeguarding policy for further information.

3. Informed consent to be understood as a process with clear procedures in place.

It is a two-way and multi-stage process – build rapport first without taking images. This may require one or more visits to a community or household and is a vital first step in building trust and encouraging dialogue.

Ensure consent is a conversation, not a presentation of forms. In 2021 on a visit to Mauritania this process was limited to a presentation from a partner translating the consent

form only, to the assembled contributors and a request for all of their thumb prints by way of consent. Which it is not.

Cover – why we use images. Provide examples of previous reports. Talk about why ASI and partners use these. Who looks and them. What difference they made to the people in them and beyond etc. This should be a conversation and questions asked and space for the contributor to ask questions.

With partners, plot out carefully the stages needed to gain consent that is fully informed. Ensure there are child-friendly, illiteracy-friendly versions of consent processes. And that they are presented in a language and a method where contributors can openly speak and ask questions. Eg, a gendered workshop, groupings avoiding caste dynamics etc.

4. Commit to sensitive and effective communication before, during and after image-gathering

ASI is a signatory of the My Story My Dignity Freedom Pledge: [My Story My Dignity \(freedomunited.org\)](https://freedomunited.org) so all images must adhere to this guidance.

Communication with contributors before the shoot is essential to support informed consent and manage expectations.

Develop resources (and approaches) to effectively convey purpose and use to contributors – this may be workshops, animated guidance or group meetings. Work with partners to identify the best method.

Invest in, and insist on, good translators to support good communication with contributors. Ensure personal consistency by making sure that contributors' contact with ASI before, during and after image gathering is with the same individual.

Invest in follow-up with contributors and the return of photographs and content. Let them see what is produced and how.

5. Ensure that human dignity is upheld in the image-making process, not just in the image itself

The image-making process is the place for realising dignity. Without wanting to place the full burden of representation on individual contributors, addressing dignity must involve consideration of how the contributor feels about their portrayal and offering them genuine respect and agency in the process of image making. Ensure that this is a part of the ongoing conversations.

For contributors, having a choice in how they are represented and coming away from the image-making process with a clear understanding of the purpose and value of their contribution is dignified. For contributors, dignity involves listening, voice and choice.

End.