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Safeguarding Policy

Purpose

MRF's vision is a world free from meningitis and septicaemia. We focus on research, advocacy and action in defeating meningitis and septicaemia.

This policy outlines our commitment to safeguarding and our utmost assurance to protect everyone that we assist and all those in contact with MRF's work from deliberate or inadvertent actions and failings that place them at risk of abuse, sexual exploitation, injury or any other harm. We firmly believe it is unacceptable to abuse power and positions of trust. Equally, each MRF staff member, volunteer or associate must have the opportunity to contribute fully to our work in a safe and dignified environment.

Scope of Policy

This policy applies to all contracted staff, volunteers (Ambassadors, Befrienders and office-based volunteers) and associates. Associates include consultants supporting the work of MRF, suppliers/service providers and fundraisers working on behalf of MRF (where MRF is aware of activities in advance) as well as visitors to MRF activities. Anyone undertaking activities on behalf of MRF will be expected to adhere to the principles of this policy.

In relation to staff and volunteers, this policy applies both during, after and in between work hours in both professional and personal lives.

Guiding values and principles

This policy has been created in line with MRF's organisational values:

Our values

- We are evidence led
- We operate with integrity
- We pursue our goals with determination
- We are a passionate advocate
- We collaborate to make progress
- We act with compassion

These span all areas of our work including: Research, Support Services, Fundraising and Operations activities that support them.

This policy also sets out our commitment to uphold relevant international and national standards which seek to protect children and vulnerable people, including the UN Convention of the Rights of the Child

(1989) and other international conventions, the African Charter for the Rights and Welfare of Children and the national legal frameworks of the countries in which MRF operates. It is guided by the following principles:

Principles

1. Everyone has:
 - Rights and duties regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, including the right to equal protection from all types of harm or abuse
 - A duty to support the protection of children and vulnerable adults and should be aware of their obligations and respond appropriately to any concerns or potential breaches of the policy
2. Some people need specific consideration:
 - Due to being additionally vulnerable because of the impact of previous experiences, their level of dependency, or communication or other difficulties which may mean that they face increased protection risks
3. MRF cares and acts in confidence:
 - We have a duty of care to those with whom we work, are in contact with, or are affected by our work and operations
 - We will provide a safe physical environment for all by applying health and safety measures in accordance with the law and regulatory guidance
 - All safeguarding concerns/reports/investigations will be dealt with confidentially and all records will be held securely by the nominated Safeguarding Officer

Definitions

Abuse – mistreatment by any other person or persons that violates a person’s human and civil rights. Child abuse is defined as all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power¹. Adults may also be vulnerable to abuse and our Safeguarding Policy aims to be inclusive of both children and vulnerable adults.

Child – any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Safeguarding – the responsibility that organisations have to make sure their staff, operations and programmes do no harm to children and vulnerable adults, and that they do not expose them to the risk of harm and abuse. Protection from Sexual Exploitation and Abuse (PSEA) and child protection come under this umbrella term. This does not include sexual harassment of staff by staff, which is covered by [MRF’s Anti-harassment and Bullying Policy](#).

¹ Definition from World Health Organisation: World Report on Violence and Health, WHO 1999 & 2002.

Vulnerable Adult – A person aged 18 or over who may be at additional risk of harm and abuse or in need of support due to mental health problems, learning disability, physical disability or other reason which put them at increased risk of harm and abuse.

Further definitions can be seen in [Appendix A](#)

Our Commitments

MRF makes commitments in a number of key areas:

Governance & accountability

- The Board of Trustees has the primary role in dealing appropriately with safeguarding issues and Trustees need to be clear about their responsibilities. They are required to report “incidents of a serious nature” to the Charity Commission – see <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>
- The Board of Trustees will review and update this policy, the [Safeguarding Implementation Plan](#) and other linked policies and procedures at least once every two years. As part of Board approval, Trustees will ensure that MRF complies with the standards adapted from the International Standards for Child Safeguarding developed by Keeping Children Safe found in [Appendix B – Standards](#)
- A progress report on safeguarding will be presented to the Board of Trustees via the Finance and HR Committee at least once each year
- Safeguarding will be incorporated into the [organisational Risk Register](#)
- Safeguarding items will be scheduled for discussion in Senior Management Team meetings at least once every three months
- Any financial costs related to safeguarding will be included in annual budgets

Designating key staff

- The Safeguarding Officer is responsible for monitoring our practice in relation to this policy and for managing any incidents or activities that arise. Formal reports can be lodged and safeguarding concerns can be discussed with the Safeguarding Officer. The current designated Safeguarding Officer is:

Contact Laura Hardidge
Email laurah@meningitis.org
Tel 0333 405 626276

- The Safeguarding Officer reports directly to the Chief Executive on safeguarding issues, who is accountable to the Board of Trustees
- The Trustees of MRF have overall responsibility for safeguarding. A Trustee will be nominated as safeguarding Trustee for the Board, who is responsible for any safeguarding issues relating to the Board itself and any necessary reporting of investigations and incidents to the appropriate authorities. **The current nominated Trustee is: Brian Scott.**

- Safeguarding concerns can be reported by following the [Safeguarding Procedures](#)

Recruitment and selection

- Safeguarding will be referenced in all our recruitment advertisements and safeguarding responsibilities should be included in all job descriptions
- Reference requests from a previous employer and a character reference will be undertaken for all staff and office-based volunteers
- Any staff planning to recruit or work with office-based volunteers should inform HR in advance of doing so and ensure that new volunteers read the Safeguarding and associated policies as well as signing the [Volunteer Agreement](#) and the [Code of Conduct](#)
- All Trustees and Staff who have regular contact with children or vulnerable adults must undergo enhanced checks relevant in their region. Screening will be via the Disclosure and Barring Service (England & Wales) Access NI (Northern Ireland), Garda Vetting (Ireland) or Protecting Vulnerable Groups-PVG (Scotland).

Code of Conduct

- Contracted staff, office-based volunteers, trustees and consultants are required to read and sign a copy of the Code of Conduct
- Efforts will be made to make other associates (suppliers/service providers and fundraisers) aware of this Safeguarding Policy and they may be requested to sign the Code of Conduct if the risk assessment deems this to be necessary
- Reference to the Code of Conduct will be made in all relevant contracts and agreements
- Breaches of the Code of Conduct or policy may lead to disciplinary action including possible dismissal. For partners/contractors, breaches can lead up to and including termination of relations including contractual and partnership agreements. Where relevant, the appropriate legal or other frameworks as per the national laws will be referred to
- MRF will not tolerate retaliation against anyone who in good faith reports losses, illegal acts or violations of the MRF Safeguarding Policy or Code of Conduct, or provides any information or other assistance in an investigation. MRF has a [Whistleblowing Policy](#).
- MRF will also not tolerate deliberate false reporting of misconduct and such behaviour will be subject to disciplinary action

Training and supervision

- MRF understands that, in order for the Safeguarding Policy to be well understood and effectively implemented, it is essential that there are high levels of awareness regarding the policy and that staff and others are clear, confident and competent in putting the policy into practice
- We will disseminate and promote the policy widely. Copies of the policy will be made available and accessible to all stakeholders, both in hard copy and electronically

- All staff will receive initial training on the policy and procedures in addition to refresher training as required. Further training should be provided for staff with specific safeguarding responsibilities
- Adherence to the Code of Conduct and this policy will be reviewed during performance appraisals for staff
- Exit interviews will be offered optionally to leavers in order to offer an opportunity to raise concerns

Research

- Research and other medical/health related activities must adhere to ethical guidelines. We will ensure that ethics approval and/or other regulatory permissions are in place before undertaking any interventions that impact on the public, whether directly or indirectly, through our funding activities
- Safeguarding approaches will be incorporated into all aspects of our research, through our research grant Terms and Conditions

Events, project visits and communications

- Risk assessments that include safeguarding considerations should be undertaken for all events and projects
- Staff and volunteers working with children or vulnerable adults at events or during project visits should be fully briefed beforehand of our Safeguarding Policy and Procedures
- Our current Data Protection Policies should be adhered to in order to obtain informed consent, in advance, for photographs or video images. These will provide guidance to staff and volunteers on how to apply consent processes and ensure that images respect human dignity and the rights, safety and wellbeing of the person or people being portrayed
- This Safeguarding Policy will be published on the MRF website and people undertaking fundraising on our behalf (where MRF is aware of this prior to the event) will be signposted to this and made aware of our expectations of them

Partnership

- This policy will be distributed to partners and any other relevant parties to ensure that the commitments, principles and practices are publicised and clear
- We will ensure, through due diligence processes, that any partner organisation has in place adequate safeguarding arrangements, including appropriate policies and mechanisms in line with MRF's values or that the MRF policy and Code of Conduct is adopted and applied by partners where this is not found to be the case
- Partners will be made aware of requirements for them to report safeguarding concerns to MRF through our Safeguarding Procedures

Reporting and responding to concerns

- We will establish and communicate clear step-by-step confidential procedures for reporting and responding to concerns
- Anyone who personally experiences a safeguarding concern has the right to confidentially disclose to whichever member of MRF staff with whom they feel most comfortable doing so
- Anyone made aware of any safeguarding concern affecting others must confidentially report this
- Reports can be formally received by the Safeguarding Officer, Chief Executive or nominated Trustee
- Through accountability processes, beneficiaries will be made aware of their right to report safeguarding concerns and the routes through which they can do so
- Any allegations of abuse made against anyone working for MRF in any capacity will be thoroughly investigated as will any alleged breach of the Safeguarding Policy or the Code of Conduct
- If the report involves a criminal act, it will be referred to the relevant authorities (including the Police) if it relates to a child. It may be referred to the relevant authorities if it involves an adult, s/he agrees to a referral and if this does not represent a protection risk to anyone involved. If concern exists that a vulnerable adult's ability to consent may be compromised, expert advice will be sought.

Appendices

A – Definitions

Associates – includes consultants supporting the work of MRF, suppliers/service providers and fundraisers working on behalf of MRF as well as visitors to MRF activities.

Beneficiary – someone in receipt of assistance. Alternatively referred to as a member of the affected population, person we seek to assist, person affected by crisis/meningitis, project/programme participant or rights holders.

Best Interests of the Child – Article 3 of the [UN Convention on the Rights of the Child](#) establishes the best interests of a child as a primary consideration in all actions affecting children. Decisions that affect children should be made based on consideration of their physical, emotional and psychological wellbeing, and the need to prevent harm to them or other children. In assessing what is in a child's best interests, the child's views must be given due consideration in accordance with their age and understanding.

Child protection – preventing and responding to violence, exploitation and abuse against children – including [but not limited to] commercial sexual exploitation, trafficking, child labour and harmful traditional practices.

Code of Conduct – a set of standards about behaviour that staff of an organisation are obliged to adhere to.

Confidentiality – an ethical principle that restricts access to and dissemination of information. In investigations on sexual exploitation, abuse, fraud and corruption, it requires that information is available only to a limited number of authorised people for conducting the investigation. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events and builds trust in the system and in the organisation.

Emotional or psychological abuse – this includes humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Partner – an organisation which is either implementing a programme, project or study funded by/through MRF or in partnership with MRF on a non-monetary basis.

Physical Abuse – involves the use of violent physical force so as to cause actual or likely physical injury or suffering e.g. hitting, shaking, burning, female genital mutilation, torture.

Protection from Sexual Exploitation and Abuse (PSEA) – the term used by the UN and NGO community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by their own staff and associated personnel.

Sexual abuse – all forms of sexual violence including incest, early and forced marriage, rape, involvement in pornography, and sexual slavery. Sexual abuse may also include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material.

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.

Sexual exploitation of a child – the sexual exploitation of a child who is under the age of consent, is child sexual abuse and a criminal offence. An underage child cannot legally give informed consent to sexual activity. MRF considers that: a. sexual activity with a child with or without their consent is child abuse and a crime e.g. rape, indecent assault; b. any sexual activity with a child who is under the legal age of consent of the country in which s/he lives and/or in which the offence occurs regardless of whether they consent is child abuse and a crime; c. consensual sexual activity with a child over the legal age of consent of the country in which s/he lives and/or in which the offence occurs, but below 18 years (although not a crime) will be dealt with as a breach of this Safeguarding Policy and the Code of Conduct.

Volunteer – a person who undertakes any activity that involves spending time, unpaid, doing something that aims to benefit MRF.

B – Standards

The following standards are adapted from the International Standards for Child Safeguarding developed by [Keeping Children Safe](#). These standards will be used to review implementation of MRF's Safeguarding Policy and Procedures and for Board approval of new or revised policies and procedures.

Policy
The organisation has a written safeguarding/protection policy, approved by the relevant management body, to which all staff and associates (including partners) are required to adhere
The UN Convention on the Rights of the Child and other Conventions and Guidelines pertaining to children inform the approach of the organisation
The policy is written in a way that is clear and easily understandable and is publicised, promoted and distributed widely to all relevant stakeholders.
The organisation is clear that everyone has an equal right to protection and that some children and adults face particular risks and difficulties in getting help, because of their race, gender, age, religion or disability, sexual orientation, social background or culture.
The policy addresses safeguarding and protection of children and vulnerable adults from harm through misconduct by staff, associates and others, from poor practice, and from its operational activities where these may harm children or vulnerable adults or put them at risk
The organisation makes clear that ultimate responsibility for ensuring the safety of children and vulnerable adults rests with senior executives (Chief Executive and senior managers) and Board members
People
There are written guidelines for behaviour (Code of Conduct) that provide guidance on appropriate/expected standards of behaviour by staff, Trustees and volunteers
All members of staff, volunteers and relevant associates have training on safeguarding and protection which includes an introduction to the organisation's safeguarding policy and procedures and learning on how to recognise and respond to concerns about abuse
The organisation is open and aware when it comes to safeguarding and protection matters such that issues can be easily identified, raised and discussed

<p>Children and other service users are made aware of their right to be safe from abuse and are provided with advice and support on keeping themselves safe including information for children, parents/carers and vulnerable adults about where to go for help</p>
<p>The organisation designates key people at different levels (including at Director level) with clearly defined responsibilities to champion, support and communicate on safeguarding and protection and for effective operation of the child safeguarding/protection policy</p>
<p>There are clear procedures in place that provide step-by-step guidance on how to report safely and what action to take if the Code of Conduct is breached and there are concerns about the safety or wellbeing of a child or a vulnerable adult</p>
<p>Procedures</p>
<p>The organisation requires local mapping exercises to be carried out that analyse the legal, social welfare and child protection arrangements in the contexts in which it works</p>
<p>There is an appropriate process for reporting and responding to safeguarding/protection incidents and concerns that fits with the local systems for dealing with incidents of abuse (as identified in the mapping exercise)</p>
<p>The identification and mitigation of safeguarding and protection risks is incorporated into risk assessment processes at all levels, i.e. from identification of corporate risks (organisational Risk Register) through to planning an activity involving or impacting on children or vulnerable adults (using a risk assessment form)</p>
<p>Adequate human and financial resources are made available to support development and implementation of safeguarding and protection measures</p>
<p>A range of policies, procedures and good practice guidance exist, relevant to the nature of the organisation and its operations, that describe how safeguarding and protection is to be achieved through systems and processes such as programming, risk management, media and communications, ICT, fundraising, sponsorship, working with partners etc.</p>
<p>Safeguards are integrated with, and actively managed into, existing business processes and systems (strategic planning, budgeting, recruitment, programme cycle management, performance management, procurement, etc.) to ensure safeguarding and protection of children and vulnerable adults are a feature of all key aspects of operations</p>

Accountability

Arrangements are in place to monitor compliance with, and implementation of, the safeguarding policies and procedures through specific measures and/or integration into existing systems for quality assurance, risk management, audit, monitoring and review

There is a system of regular reporting to key management forums, including senior management team level, to track progress and performance on safeguarding and protection, including information on safeguarding and protection issues and cases

External or independent bodies such as the Board of Trustees or related committees are used to monitor performance in this area and hold senior executives to account in relation to safeguarding and protection

Opportunities exist for learning from practical case experience to be fed back into organisational development

Policies and practices are reviewed at regular intervals and formally evaluated at least once every 3 years

The organisation's annual report includes performance on safeguarding and protection

C -Related policies and documents

All staff and office-based volunteers should ensure that they are familiar with MRF's policies. Safeguarding considerations are included in the following:

- Employment Contract
- Anti-harassment & Bullying Policy
- Complaints Policy
- Conflict of Interests Policy & Declaration
- Agreements with contractors
- Data Protection Policy
- Disciplinary Procedure
- Equality and Diversity Policy
- Fraud Policy
- Grievance Policy
- Health and Safety Policy
- Volunteer Policy
- Whistleblowing Policy