



LINK
EDUCATION

Link Education International

Safeguarding Policy

Protection Against Sexual Exploitation, Abuse and all
forms of Harassment.

Policy introduction

Link Education International (from herein referred to as Link International) believes that all staff, volunteers, vulnerable adults or persons at risk should never experience abuse or exploitation of any kind. We have a zero-tolerance approach to bullying, harassment, sexual exploitation or abuse targeted at beneficiaries or staff by any of our staff, representatives or partners. We also have a responsibility to work in a way that promotes the welfare of all, including Link International's own staff and partners and protects them from harm.

Our adult safeguarding policy demonstrates accountability to beneficiaries, staff and all partners, having an organisational culture that tackles power imbalances and gender inequality, and rigorous, anonymous and safe reporting and complaints mechanisms. Link International's reporting framework also allows for concerns to be shared regarding potential safeguarding violations perpetrated by workers and representatives of other organisations. All allegations of potential or actual child abuse are covered in the Child Safeguarding Policy.

We affirm our belief in the right of all people to be protected from all forms of abuse, neglect, exploitation and violence, in line with UN recommendations¹ and national legislation. We acknowledge our duty to do everything in our control to ensure safeguarding mechanisms are in place to prevent and reduce all forms of abuse and harassment and to respond swiftly and effectively to any incident or concern when reported. In addition, Link International will make efforts to proactively engage with staff, beneficiaries, partners and people in the communities they work in, to establish and maintain relevant and accessible safeguarding systems. This will include creating awareness of the expected behaviour of Link International staff and representatives and how to report a concern.

General Principles

Link International's Safeguarding Policy is based on the following set of principles:

- Everyone has equal rights to protection from abuse and exploitation, including children and adults at risk.
- Link International commits to the protection of beneficiaries, community members, staff and representatives from sexual exploitation, abuse and all forms of harassment, and the provision of care and protection where sexual exploitation, abuse and or harassment are alleged.
- Link International will engage proactively with the communities in which we work to prevent, report and respond to allegations of sexual exploitation, abuse or any form of harassment and contravention of their rights.
- Sexual exploitation and abuse are acts of unacceptable behaviour and prohibited conduct for all Link International staff, partners, volunteers and anyone associated with the delivery of Link International's work.
- Anyone acting on behalf of Link International understands that everyone, regardless of gender, ethnicity, culture, age, religion, socio-economic background, sexual orientation or ability, has equal rights to protection, including children and adults at risk.

¹ This refers to national legislation and action plans on Child Protection in Link International's countries of operation, including The Children Act (1989) in the UK; the Child Care Protection and Justice Act (2010) in Malawi; the National Social Protection Strategy 2007 (NSPS) and The Children's Act of 1998 (Act 560) in Ghana; The National Strategic Programme Plan of Interventions for Orphans and Vulnerable Children (NSPPI-2) and The Children's Act in Uganda; and the UN Convention of the Rights of the Child (UNCRC) 1989; Adult Support and Protection (Scotland) Act 2007

- All staff, trustees and third parties e.g. consultants, contractors, suppliers, sub-contractors, have a responsibility to meet minimum standards of protection for all programme beneficiaries including children and vulnerable adults, in Link International programmes, as well as towards each other.
- All staff, trustees and third parties must demonstrate the highest standards of integrity and conduct in both their professional and personal lives and must not abuse the position of trust that comes as being part of the organisation.
- All staff, trustees and third parties must do all that they can to prevent, report and respond appropriately to instances of suspected or actual sexual exploitation, abuse and/or harassment.
- To learn and apply lessons as an organisation and sector and seek further advice whenever required.
- This Safeguarding Policy should be considered alongside other relevant policies and procedures in Link International's Employee Handbook including Child Safeguarding, Whistle blowing, Harassment (which includes sexual harassment and bullying), Anti-slavery, Procurement, Recruitment and Selection, Data Protection and the Media and Communications.
- Investigate concerns that this policy has been breached and prioritise the best interests of any victims or survivors.
- Put in place robust measures to prevent any perpetrators of sexual exploitation and abuse or harassment and victimisation of staff or any other adult from being re-engaged by Link International or associated organisations or other NGOs and organisations working with vulnerable people. This includes a commitment to procure and provide accurate references and reporting cases to statutory authorities.

1. Scope of the policy

This policy covers actual, and suspected acts of sexual exploitation and abuse, all forms of harassment, including sexual harassment, bullying and intimidating and humiliating behaviour perpetrated by Link International staff and representatives against adults.

The Policy applies to all staff, whether international or national, full time, part time, volunteers and trustees, and to those engaged on short-term contracts e.g. consultants, researchers, sub-contractors and suppliers of Link International. The policy also applies to staff and representatives of partner agencies and any other individuals, groups or organisations who have a formal/ contractual relationship with Link International that involves any contact with children or vulnerable adults (unless it is formally agreed that a partner organisation enforces its own safeguarding policy).

Donors, journalists, celebrities, politicians and other people who visit any of Link International's programmes or offices must be made aware that this Safeguarding Policy applies to them. Link International expects that all those above, when representing Link International, must act in accordance with this policy in both their professional and personal lives during and outside of working hours.

This policy makes it a duty for all members of staff and other representatives as outlined above to report concerns regarding potential exploitation, abuse and harassment of others by our staff or representatives immediately and within 24 hours of the incident or concern being raised.

2. Definition of terms

‘Vulnerable Adult’ or **‘Adult at Risk’** refers to a person 18 years or over who is, or may be, unable to take care of themselves against harm or exploitation, whether due to age, physical or mental disability or otherwise. It should also be acknowledged that other factors such as unequal power dynamics, poverty and gender amongst others, can also make a person more vulnerable.

‘Safeguarding’ is the responsibility of organisations to make sure their staff, operations and programmes do no harm to children and vulnerable adults or expose them to abuse or exploitation. Best practice states we should think about how we safeguard everyone in our organisation at all times, including protecting staff from inappropriate behaviour such as bullying and harassment.

‘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 sexual exploitation or another.

3. Safe recruitment and selection of personnel and partners

Link International applies robust safe recruitment approaches when recruiting and selecting staff, volunteers, trustees and partners. A zero-tolerance safeguarding commitment is in all job descriptions and contracts and full background checks are carried out on all prospective staff.

Link International has a robust Recruitment and Selection Policy which aligns with this Safeguarding Policy.

For organisations selected to work in partnership with Link International;

- They will be requested to have a Safeguarding Policy in place to protect their staff and other adults from all forms of sexual abuse, exploitation and harassment which is rigorous and appropriate, and aligned with Link International’s commitment and expectations towards safeguarding.
- They will be expected to apply safer recruitment principles and practices, including carrying out reference and relevant background and police checks according to what is available in-country.
- Partnership agreements between Link International and partners will show clearly that all safeguarding issues must be reported immediately and within 24 hours to the International Programme Director of Link International.
- Agree in the Partnership Agreement that any failure of the Partner to do all they can to prevent, report and respond appropriately to allegations of sexual exploitation and abuse; harassment, including sexual harassment, bullying, physical and verbal violence; and any other contravention of the Safeguarding Policy shall constitute grounds for Link International to terminate their partnership.
- Ensure similar principles to prevent sexual exploitation and abuse, and any form of harassment and bullying in their own policies; including clear obligations requiring staff and representatives to comply and report breaches of such standards and an organisation commitment to act robustly when safeguarding reports are received.

A clear Code of Conduct will be shared and adhered to by all partner personnel, sub-contractors, and other representatives.

4. Code of Conduct and Professional Behaviour

The Safeguarding Code of Conduct contains the essential principles and rules that reflect the behaviours and standards Link Education (Link) expects of staff, volunteers and representatives in promoting Link values and to protect its reputation. It is the responsibility of us all individually and collectively to ensure our behaviour is consistent as set out in this Code of Conduct.

The basic values of Link require that we observe the laws, customs and traditions of the countries where we work or are visiting. In cases where such laws, customs or traditions contravene the UN Convention on the Rights of the Child or the UN Declaration of Human Rights, then the latter two shall prevail. They are founded on the conviction that all children and adults are of equal value, children have special rights and everyone has a responsibility to uphold those rights.

For staff, representatives and third parties, this Code of Conduct covers behaviour in and outside of working hours and sets an ethical framework which applies **24 hours a day, 7 days a week and 365 days a year**.

Link representatives MUST ALWAYS:

- Work actively to protect all by complying with Link's Child Safeguarding and Safeguarding policy and procedures.
- Create a safe environment for children and anyone we seek to help (including vulnerable adults) to prevent them from all forms of abuse and harm, including physical, sexual or emotional exploitation or abuse, harassment or neglect.
- Challenge any attitude or behaviour of an employee or other representative working for or on behalf of Link in any capacity, and members of the communities where we work, which contravenes Link's Code of Conduct.
- Treat all children and anyone we are trying to help with the same respect and provide support and aid according to their needs.
- Be aware of how conduct and behaviour may be interpreted by children, beneficiaries and people from different social/economic and cultural contexts.
- Provide space and opportunity for children, vulnerable adults and anyone we are trying to help to talk about and raise their concerns.
- Uphold and adhere to all Link policies and procedures.
- Respect the basic rights of others by acting fairly, honestly and tactfully, and treat all with dignity and respect.
- Maintain high standards of personal and professional conduct at all times avoiding any behaviour which may be detrimental to Link, its partners and/or beneficiaries, including acting appropriately around the Link logo.
- Protect the safety and well-being of themselves and others.
- Protect the organisation's assets and resources.
- Report within 24 hours any matter that breaks the standards contained in this Code of Conduct.

Link representatives MUST NEVER:

- Abuse, exploit or develop physical or sexual relationships with anyone under the age of 18. Sexual relations are prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding age is not a defence.
- Have sexual relationships with sex workers or any adult beneficiaries, since these are based inherently on unequal power dynamics, undermine the credibility and integrity of Link and are strongly discouraged.
- Take part in any form of discrimination, harassment, bullying, humiliating behaviour or abuse (physical, sexual, emotional, verbal), intimidation or exploitation, or in any other way infringe the rights of others. This includes behaviour towards intimate partners.
- Engage in harmful traditional practices including Female Genital Mutilation, Child Early and Enforced Marriage.
- Use anyone under the age of 18 as a domestic worker.
- In anyway trivialise child abuse or the exploitation and harassment of adults.
- Supply alcohol or harmful substances to a child or vulnerable adult.

- Do things of a personal nature for a child or anyone we helping that they can do themselves, such as bathing.
- Place children or any beneficiary in unsafe situations or conditions.
- Send private messages to children or anyone from a vulnerable community met through Link, for example private messaging on social media channels, unless from the vulnerable community and communicating with family members.
- Fail to report a safeguarding concern or breach of the code of conduct or any other Link policy or procedure. This includes allowing any suspicion of abuse or poor practice to go unreported.
- Interfere with the complainant, witnesses or hamper any investigation or enquiry, which is being carried out into a child safeguarding, staff or beneficiary concern or breach of one of Link's policies.
- Use computers or other electronic devices to view, download, distribute or create indecent or inappropriate materials, such as pornography.
- Distribute gifts or financial support to a child or beneficiary. Support must go through official channels via Link.
- Show favouritism, which includes giving personal gifts to beneficiaries.
- Take photographs or recordings using personal devices. Staff may do so, if cleared in advance with the line manager, and if images or recordings are uploaded to a Link computer and then deleted from the device within 48 hours.
- Engage in social media relationships or post or share images or recordings of beneficiaries on social media.
- Drink alcohol or use any other substances in a way that adversely affects the ability to do the job or affects the reputation of Link.
- Accept bribes or significant gifts from governments, beneficiaries, donors, suppliers or others, which have been offered as a result of your employment.
- Be in possession of, nor profit from the sale of, illegal goods or substances.
- Behave in a way which threatens the security of yourself or others.

Any staff found to be in contravention of any of the above will be subject to Link's disciplinary procedures as detailed in the Employee Handbook. Failure to adhere to this code by consultants, partners, contractors, volunteers and other third parties may lead to termination of contracts or agreements and any relationship with Link. Other visitors, such as funders, will be reported to the appropriate authorities.

5. Awareness and training

The Senior Management team of Link International will ensure that opportunities are available, including via online, to staff, volunteers including trustees and others as appropriate, to develop and maintain the necessary skills and understanding in safeguarding. This will include:

- An induction process that includes training on acceptable and unacceptable sharing of information and general communication about children and vulnerable adults, reporting and reaction protocol, and ramifications of misconduct. This will ensure a common understanding of safeguarding and protection issues, standards of practice, and the organisational implications of these. Induction will take place within one month of a new recruit's start date.
- Safeguarding is included in six-monthly and annual staff appraisals to ensure staff knowledge and skills can be assessed to identify appropriate education and training.
- Ensuring that the Code of Conduct and safeguarding reporting mechanism is prominently displayed in all Link offices and is easily accessible via the website.

- All training will include Data Protection, Harassment (bullying, sexual abuse), Whistle blowing and the Disciplinary and Grievance Policies and procedures which are detailed in the Employee Handbook.
- Link International will ensure each Link partner office (in Ethiopia, Ghana, Malawi, Rwanda and Uganda) aligns their own safeguarding training to meet the expectations of Link International.
- When visiting Link International's projects and partners' projects, all visitors, including Link International staff, will be given a pre-departure briefing on safeguarding, and general safety and security. This will outline key risks, issues to be aware of, expectations of visitor behaviour, rules around taking photographs and distributing gifts, and what to do if a visitor witnesses or suspects any safeguarding issue. All visitors will also be given a Code of Conduct which they must read and sign before the visit begins.

Link International and partners will apply safer programming approaches across all programmes and projects. This will be dependent on available resourcing and should include:

- A risk assessment to identify all safeguarding risks and measures to prevent and manage risks, including health and safety mechanisms.
- Integration of safeguarding into project design with secure funding.
- Project work on safeguarding in schools and communities.
- Unsafe or poor practice being followed up.
- Support to victims of sexual exploitation or abuse with referral pathways identified and signposted.
- Support to Link staff according to Employee Handbook procedures.

6. Management responsibilities

Link International's management structure ensures implementation of the Safeguarding Policy including:

- Permanent appointment of a suitably-trained designated person with a clearly defined role responsible for implementing the Safeguarding Policy to ensure a clear understanding among all representatives of the organisation of all relevant issues relating to safeguarding.
- Sharing of the reporting mechanism ensuring it is understood by all Link International representatives. Where possible, Link International will refer to helpful agencies any staff who require support after being involved in a safeguarding incident.
- Ensuring the storage and access to personal information on children and vulnerable adults is limited to those who need to know to ensure respect for their right to confidentiality and privacy, and to protect them from those who may use information for harmful purposes. The Senior Management Team will ensure that data protection induction and training takes place for all acting on behalf of Link International staff and that records are kept in line with General Data Protection Regulation 2016/679 (as per company policy on Data Protection) as well as relevant national legislation.
- Incorporating child and vulnerable adult safeguarding into regular internal and external programmes, project and organisational evaluations and assessments, office procedures and manuals to ensure internal monitoring against targets, and external transparency and objectivity.
- Overall responsibility for overseeing the implementation of the safeguarding policy lies with Link International's Board of Trustees to ensure due importance is afforded to this area. A standing position on the Board will be a Safeguarding Champion.

- Accountability - The Link International CEO has overall responsibility for creating the managerial environment and culture which enables and facilitates the implementation of all aspects of this policy, and other related policies such as the Whistle blowing and Harassment policies and procedures. The CEO also holds overall responsibility for developing and implementing local procedures and for delegating responsibility to key posts including the Senior Management Team.

7. Reporting

Link International will be proactive in creating a safe culture that enables beneficiaries, including children, staff and others to report any incidences, or suspicion of incidences, that breach this Safeguarding Policy. The reporting mechanism is clearly laid out in Annex 2. Reporting and case management templates are shown in Annexes 3 and 4. Media consent forms and the Media and Comms policy are in Annexes 5 and 6. In brief:

Link International acknowledges that the decision to report a concern can be difficult and will support those on how to raise legitimate concerns and will not tolerate the harassment or victimisation of staff for doing so, regardless of whether or not the concern is upheld. No staff member reporting a legitimate concern under this policy will have their continued employment and future opportunities of promotion and training prejudiced as a result. Any examples of victimisation taking place will be treated as a disciplinary offence and dealt with by senior management.

If a staff member or representative feels unable to raise a concern through the usual reporting process under this policy (for instance they feel a concern previously raised has not been acted upon), they should raise their concern in accordance with Link International's Whistleblowing Policy and procedure either through Link International's Safeguarding Focal Person, the CEO or Chair of Link International's Board of Trustees.

- An incident, or suspicion of an incident, MUST be reported to Link International immediately or within 24 hours.
- Link International will provide the mechanisms, training and guidance for reporting. Link International will follow up with partners to ensure appropriate action has been taken.
- Link International will report any incidences to the donor, Charity Commission (for England and Wales) and the Office of the Scottish Charity Regulator (OSCR).
- All reports will be confidential.
- Anyone that reports a concern regarding a colleague in good faith or a beneficiary reporting a link representative, will be protected under Link International's Whistle blowing procedure, as detailed in the Employee Handbook.
- Link International Senior Management will provide appropriate support to staff and others affected by safeguarding issues raised to reduce the stressful impact of the situation.
- If an incident occurs in a school or learning environment, the incident will be reported to the headteacher, the relevant local educational authority and the focal person in the relevant Link office, and if a crime has been committed, to the police.
- Any incidences will be publically shared at Link International's AGM and in our Annual Report.

8. Victim/Survivor Assistance

Where available and appropriate, Link International will refer and support victims and survivors to receive assistance to recover. This will be done in full consultation with them.

9. Ramifications of Misconduct

Link International takes safeguarding seriously and will implement this policy rigorously across the organisation. In the event that anyone acting on behalf of Link International violates any aspect of this policy, appropriate action will be taken.

Any form of sexual exploitation and abuse, harassment, including sexual harassment, physical, verbal and emotional abuse, bullying, intimidating or humiliating behaviour is 'gross misconduct' as listed in the Employee Handbook and may result in summary dismissal.

Abuse or suspicion of abuse not reported or a false allegation made, will be dealt with according to Link International's disciplinary procedures detailed in the Employee Handbook. Grievance procedures are also detailed in the Employee Handbook.

10. Policy monitoring and review

This policy will be reviewed every two years by Link International's Senior Management Team and Board of Trustees. Anyone acting on behalf of Link International will be asked to read and sign that they have understood this policy. Whenever the policy is revised, all must re-sign.

Link International receives advice from its legal advisor and HR consultants on the formulation, enforcement and revision of the Safeguarding Policy and other policies and procedures linked to it.

The annexes must also be read, understood and adhered to. These include the reporting mechanism, the Media and Communication Policy, consent forms and reporting templates.

Declaration

I _____ fully understand and agree to abide by Link International's Safeguarding Policy, attached annexes and Code of Conduct. I understand that any breaches of the Code of Conduct and this Safeguarding Policy will be reported to the International Programme Director of Link International and appropriate action will be taken in accordance with the relevant policies and procedures.

I have read the attached policy and all the annexes.

Signature: _____

Date: _____

List of annexes:

1. Code of Conduct
2. Reporting Mechanism
3. Reporting Procedure and Template
4. Case Management form
5. Consent form for photography and filming

6. Media and Comms policy
7. List of resources to develop staff and partners understanding on Safeguarding and Child and Vulnerable Adult Protection