

EDUCATION DEVELOPMENT TRUST

Global Safeguarding Policy

Maintenance

Policy owner	Corporate Safeguarding Adviser
Review	November 2020
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Version Control

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Version 1	FINAL November 2020

If you have questions about how to interpret this policy, please ask the Corporate Safeguarding Adviser – details available on the SharePoint safeguarding page



1 Scope

As an international organisation, Education Development Trust's (Ed Dev Trust) duty to safeguard children and adults applies both to our work in the UK and internationally where children and adults may face different or additional risk of exploitation, abuse, and harassment.

Education Development Trust's Global Safeguarding Policy is informed by a set of principles derived from the United Nation's Convention on the Rights of the Child (UNCRC), the Human Rights Act, 1998, and the Equality Act, 2010.

This policy applies to everyone working for, or associated with, Education Development Trust. It encompasses the whole of the organisation and its programmes, and includes without limitation:

- trustees
- employees at all levels: international and UK
- Ed DevTrust partners: these include volunteers, consultants and sub-contractors, and employees and/or representatives of partner organisations who have contact with our beneficiaries and access to the communities that we work in, and who may also be party to child and adult sensitive data while working for, or with us
- visitors: including family members, associates of Ed Dev Trust employees, clients, journalists, researchers, media, and celebrities, who may come into contact with beneficiaries and the communities that we work in

2 Policy

This policy articulates our moral commitment and, legal and regulatory responsibilities to safeguarding and protecting children and adults from all forms of exploitation, abuse, and harassment and particularly, sexual exploitation, abuse, and harassment (SEAH). It makes clear to all in the organisation and those who come into contact with us the acceptable attitudes and actions that are required to protect our employees, beneficiaries, and the community members that we come into contact with, through the course of our work.

Taking a holistic approach to the protection of children and adults, safeguarding is embedded throughout Ed Dev Trust's operational policies and procedures, ensuring a comprehensive and consistent approach throughout the organisation.

Education Development Trust's safeguarding commitment is informed by, but not limited to, the following principles:

For this policy, the term employees include interns, sub-contractors and their staff, partner staff and volunteers

Zero-tolerance

Zero-tolerance policy against actual or attempted acts of all forms of exploitation, abuse, and harassment, including SEAH, perpetrated by employees toward members of its workforce, beneficiaries, and community members.

Accountability

Safeguarding legal accountability rests with the Board of Trustees, delegated to the Chief Executive Officer with clear lines of incident reporting and compliance monitoring procedures via the Corporate Safeguarding Committee (CSC). Ed Dev Trust takes a risk management approach to safeguarding throughout its operations, ensuring, as far as possible, effective mitigation to inherent and known risks, and responding to incidents and emerging risks.

Responsibility

All trustees and employees act with integrity, acknowledging that **safeguarding is everyone's responsibility** and we each have a role to play in ensuring a vigilant and safe culture by participating in the following procedures:

- safe recruitment, including induction and probation
- training and awareness raising activities
- serious incident/concern reporting
- risk management
- and, abiding by the:
- Code of Conduct and the safeguarding requirements for direct and indirect contact with beneficiaries and community members

Transparency

All employees commit to promptly reporting safeguarding incidents or concerns to Ed Dev Trust via their local safeguarding leads or designated safeguarding lead/s (DSLs) so that immediate action can be taken to:

- eliminate further harm to the individual/s
- refer to statutory child/adult protection agencies, including the police when a potential crime has occurred
- report to regulatory authorities and donors/clients
- instigate the case management procedure

Ed Dev Trust will provide prompt reports to statutory agencies, regulators, and donors, sharing information in an honest and transparent manner.

3 Management

Safeguarding is embedded throughout the organisation's governance structure and safeguarding management procedures, which include the following:

- quarterly Corporate Safeguarding Committee (CSC) meetings
- corporate and programme-specific expert capacity and resource
- strategic safeguarding action plan
- internal annual evaluation and report to the CSC and Board of Trustees
- central monitoring and quarterly reports to the CSC and Board of Trustees
- outsourced internal audit on corporate arrangements
- operational safeguarding action plans governed by the principle of continuous improvement in both compliance and best practice
- operational frameworks
- partner/sub-contractor due diligence
- risk management including programme-specific risk registers
- safe recruitment, including criminal record checks and references
- safeguarding training and enablement strategy
- communications plan
- serious incident reporting to statutory and regulatory agencies
- MyConcern online reporting and case management system and central log
- incident/case management and review
- safeguarding whistleblowing

4 Roles and responsibilities

- **Board of Trustees:** is ultimately accountable for ensuring that the organisation has appropriate structures, processes, and resources in place to ensure safeguarding is integrated throughout the organisation and its programmes
- **Chief Executive Officer (CEO):** is the senior accountable officer for all aspects of safeguarding across the organisation
- **Leadership Team (LT):** is responsible for the leadership of safeguarding in their directorates
- **Senior Management Group (SMG):** is responsible for the operational management of safeguarding in their respective business areas
- **Corporate Safeguarding Committee (CSC):** a sub-committee of the Board of Trustees, comprising the CEO, members of LT and SMG, and chaired by a trustee, who reports directly into the Board of Trustees on the strategic and operational work of the committee
- **Corporate Safeguarding Adviser (CSA):** coordinates the strategic and operational work of the CSC, reporting to it on compliance and practice throughout the organisation. The CSA is also responsible for coordinating incident/allegation management, and coordinating the annual evaluation cycle
- **Designated Safeguarding Leads (DSLs):** responsible for implementing local operational child/adult protection procedures and complying with internal reporting procedures and external referral mechanisms
- **Programme-specific safeguarding leads/officers/specialists** (*specific to programmes in Africa*): responsible for developing, implementing, and maintaining programme-specific frameworks and implementing the corporate reporting procedures and external referral mechanisms
- **Safeguarding focal person** (*specific to programmes in Africa*): responsible for accepting incident reports at field/local level and escalating to programme safeguarding leads/officer/specialist or DSLs, as applicable
- **All employees:** responsible for recognising potential signs and indicators of exploitation, abuse and harassment, and promptly reporting incidents/concerns to their DSL or field-based focal person/s in their respective business area or programme

4 Related documents

Safeguarding is a cross-cutting issue, intersecting with many aspects of Ed Dev Trust's operational management policies and procedures demonstrated by its links to, and specific provisions in, the following documents:

- Recruitment and Selection Policy
- Consultancy Recruitment and Selection Policy
- Disclosure and Barring Service (DBS) Policy and procedure
- Code of Conduct
- Safeguarding Code of Conduct
- Inclusion and Diversity Policy
- Dignity at Work Policy
- Risk Management Policy
- Data Protection Policy
- Use of Social Media Policy
- Whistleblowing Policy and procedure
- Disciplinary procedure
- Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Feb 2021
- Programme safeguarding frameworks and school operating safeguarding policies and procedure

Implementation and Monitoring

The monitoring and adherence of this policy is the responsibility of the Corporate Safeguarding Committee, delegated to the DSLs and the Corporate Safeguarding Adviser. The Corporate Safeguarding Adviser must report all serious incidents or breaches to this policy to the Chief Executive Officer and Board of Trustees.

The Corporate Safeguarding Committee delegates the annual review of this policy to the Corporate Safeguarding Adviser together with the annual review of all local safeguarding policies and procedures, and updating associated policies in alignment with this policy; the Corporate Safeguarding Adviser will present the reviewed policy on an annual basis to the CSC and Board of Trustees for approval.

Education Development Trust trustees retain accountability for the safeguarding and child/adult protection procedures/ processes of the Trust and will review this policy annually.

Versions

This policy can be translated with the consent of, and verification by, the Corporate Safeguarding Committee, and will be subject to their approval, prior to dissemination.

5 Resources

Education Development Trust's internal SharePoint safeguarding page is a repository for all safeguarding policies and procedures, information, training materials and links, including but not limited to:

- table of signs and indicators of child abuse
- table of signs and indicators of adult abuse
- international definition of terms – child and adult abuse
- table of serious reportable incident examples to report to Charity Commission
- links to current government safeguarding statutory guidance and advice
- link to the UK's Care Act, 2014, which sets out adult protection procedures
- Education Development Trust's safer recruitment process and training slide-deck
- Corporate Safeguarding Committee Terms of Reference document

6 Appendices

- Appendix i: Child protection
- Appendix ii: Adult protection
- Appendix iii: Serious incident reporting procedures and routes of escalation
- Appendix iv: Whistleblowing safeguarding concerns
- Appendix v: Template declaration

Appendix i: Child Protection

Child protection

The United Nations Convention on the Rights of the Child (UNCRC) defines a child as any person under the age of eighteen, regardless of whether a nation's laws recognise adulthood earlier.

Safeguarding and promoting the welfare of children is a proactive approach and encompasses a range of measures Ed Dev Trust has put in place to protect children from potential dangers and risks of exploitation, abuse, and neglect.

Child protection is defined as the activity that is undertaken to protect a specific child who is suffering, or is likely to suffer, significant harm caused by exploitation, abuse, or neglect.

Operational child protection procedures are child centred and provide early help, which is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years and early adulthood.

The UK's legislation, The Children Act, 1989 Section 47, introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life, in the best interest of the child. The Children's Act defines a child as anyone who has not reached the age of eighteen. The local authority is under a duty to make enquiries and to provide services where a child is suffering or likely to suffer significant harm. Similar procedures exist internationally and are detailed in programme/ regional child protection reporting procedures.

UK statutory guidance, Working Together to Safeguard Children, July 2018, defines safeguarding and promoting the welfare of children as:

- protecting children from maltreatment
- preventing impairment of children's health and development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- acting to enable all children to have best outcomes

The United Nations defines violence against children as:

'all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse'. Education Development Trust's safeguarding arrangements aim to protect all children that we work with from all forms of maltreatment and harm in line with local legislation and child protection frameworks, where they exist. Where they do not exist or are weak, arrangements will be made with bona fide organisations (NGOs/INGOs/Civil Society Organisations) who provide child protection services and support.

Exploitation, abuse, and neglect are all forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. Children and young people may be exploited or abused regardless of their age, gender, religious belief, racial origin or ethnic identity, culture, class, disability, or sexual orientation.

Gender-based violence and inequality

Gender-based violence refers to the continuum of emotional, psychological, economic, physical and sexual abuse, which is experienced disproportionately by women and children, and perpetrated predominantly by men.

It includes, but is not limited to, domestic abuse, child sexual abuse, rape and sexual assault, sexual harassment, so-called honour crimes, and commercial sexual exploitation. Discrimination in relation to ethnicity, disability, sexual orientation, poverty, age, migrant or refugee status, and those who speak out about gender-based violence, can increase and intensify vulnerability to abuse.

Gender-based violence is also a rising issue in online spaces, where girls are pressured to leave online platforms, or self-censor to avoid abuse, putting the onus on girls to change their behaviour, rather than perpetrators being challenged.

Education Development Trust promotes non-violent, respectful, positive gender equitable relationships for all those who come into contact with the organisation through the course of our work, including the most vulnerable and excluded members of society.

More details on our policy and procedures to address gender-based violence are contained in our Protection from Sexual Exploitation, Abuse and Harassment Policy and procedures.

A gender responsive strategy is embedded in our international programmes, addressing societal norms that uphold gender-based violence and procedures to support a victim of gender-based violence.

Potential signs and indicators of abuse

Recognising indicators of potential abuse is complex and there is no simple checklist which allows easy recognition. There are potential warning signs to be alert to, but they should be assessed with care, and assumptions of abuse must not be made.

Equally, it is important not to dismiss concerns or ignore any signs of abuse; these should be discussed with the DSL as soon as possible to help decide the most appropriate course of action.

A table of signs and indicators of child abuse is signposted under *resources* and provides a reference guide to some of the potential signs and indicators of abuse. The reference guide is not exhaustive and should be utilised with an understanding of regional cultural norms such as female apparel.

Child disclosure

If a child tells an employee/partner that abuse is taking place they should be acknowledged, taken seriously, and listened to. The child may feel unsafe, so it is an opportunity for the employee to provide immediate support and understanding. An employee must never promise confidentiality but must advise the child that they will need to tell at least one other adult so that they can be helped and protected. If a child does not proceed with the disclosure, the employee must make a prompt report to the DSL for advice.

Child protection process

1. The employee/partner should promptly report their concern or an incident to their local DSL or deputy DSL
2. The DSL will assess the report and liaise with the Corporate Safeguarding Adviser on the most appropriate course of action, including external reporting and referral to statutory authorities.
3. The DSL will retain a chronology of the matter on MyConcern until a satisfactory conclusion resulting in the safety of the child is implemented.
4. Each child protection case will be monitored and reviewed by the corporate safeguarding adviser to ensure that timely and effective action has been taken by the DSL and local staff.

Appendix ii: Adult Protection

Adult protection

UK legislation, The Care Act, 2014, defines adult protection as:

'Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognize that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances'.

An adult at risk of exploitation, all forms of abuse and harassment, is any person who is aged 18 years or over or who may be at risk of exploitation, abuse, and neglect because of their needs for care or support be they acute or continual because of disability or long-term illness.

There are many types of abuse (some of which are criminal offences and should be reported to the police, ideally with the consent of the individual/s concerned, and after an assessment of potential re-victimization has been undertaken):

- physical abuse
- domestic violence or abuse
- violence towards women (gender-based violence)
- sexual abuse (including exploitation and harassment by a person in a position of power/trust)
- psychological or emotional abuse
- financial exploitation and abuse
- modern slavery
- discriminatory abuse
- organisational or institutional abuse
- neglect or acts of omission

Ed Dev Trust applies the following six principles to protect individual adults that we work with around the globe:

1. empowerment – people being supported and encouraged to make their own decisions and informed consent
2. prevention – it is better to take action before harm occurs
3. proportionality – the least intrusive response appropriate to the risk presented
4. protection – support and representation for those in greatest need
5. partnership – local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse
6. accountability – accountability and transparency in safeguarding practice

In the UK, there are six categories of people who fall within the definition of regulated activity i.e. employees providing the services below who must undergo a DBS criminal records check and Adult Barred List check prior to commencing role:

1. providing health care
2. providing personal care
3. providing social work
4. assistance with cash, bills and/or shopping
5. assistance in the conduct of a person's own affairs
6. conveying/transporting an adult

All cases of sexual exploitation, abuse and harassment by staff/partner staff must be promptly reported to the DSL for assessment, who will respond in line with the Trust's Protection from Sexual Exploitation, Abuse and Harassment Policy and local reporting and referral procedures.

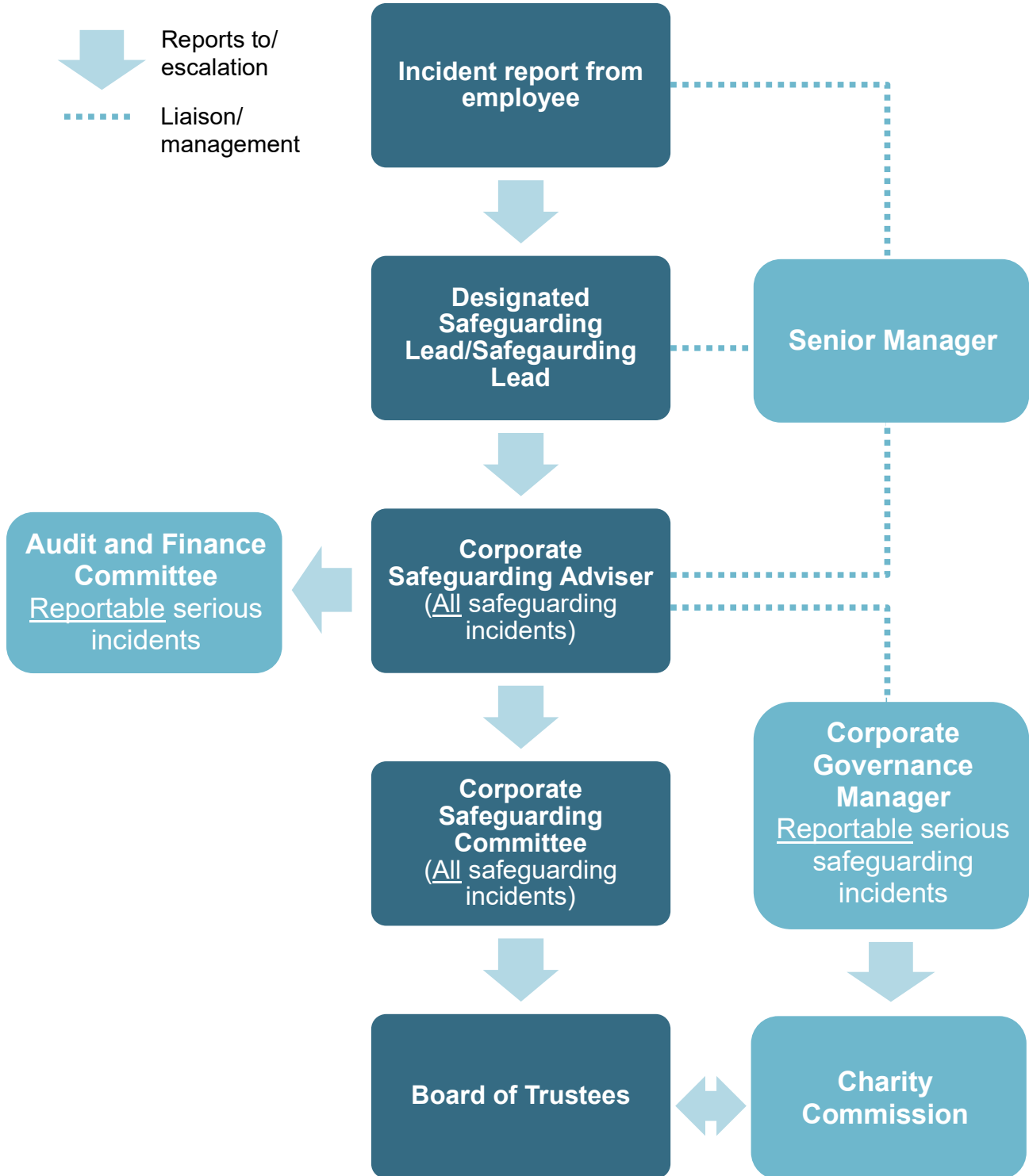
Other adult protection incidents and concerns must be reported to the local DSL who will assess the report and assist with reporting/referring to the appropriate statutory authorities/agencies, or the police, if an adult is at immediate risk of harm or poses a risk of harm to themselves.

The DSL will maintain a record of the adult concern, actions taken, including reporting and referrals to statutory authorities/agencies on MyConcern, ensuring that a case is satisfactorily closed, and the immediate needs of an adult have been met.

Staff working with adults will undergo relevant training to enable them to recognise the signs and indicators of adult abuse, a table of which is signposted under *resources*.

Appendix iii: Serious safeguarding incident reporting to the Board of Trustees

Flowchart 1: Serious safeguarding incident reporting to the Board of Trustees



Serious safeguarding incident reporting

All serious safeguarding incidents are promptly reported to the Chief Executive Officer and the following members of the Board of Trustees:

- Chair of the Board of Trustees
- Safeguarding Trustee/Chair of the Corporate Safeguarding Committee
- Chair of the Audit and Finance Committee
- Director and/or senior manager of relevant business area

The above will receive regular updates whilst an initial risk assessment and fact-finding enquiries are made by the corporate safeguarding adviser and members of the allegation management team (flowchart 2 below) to ensure that correct action is undertaken and required reporting is promptly made.

Where an incident meets the reporting threshold to our regulator, the Charity Commission, a prompt report will be submitted by the Corporate Governance Manager and Corporate Safeguarding Adviser on the behalf of Education Development Trust, subject to approval by the Chief Executive Officer and safeguarding trustees.

Reporting to the police

Where a crime has been committed or where a potential crime has been committed, a prompt report will be made to the police for their investigation. The Corporate Safeguarding Adviser and local DSL will co-operate with statutory enquiries, sharing information and co-operating with enquiries and investigations.

Donor mandatory reporting

Prompt reports will be made by the Corporate Safeguarding Adviser in line with client and donor contractual requirements, including the Foreign, Commonwealth and Development Office (FCDO) via their reporting inbox: reportingconcerns@fcdo.gov.uk

Referrals to statutory child protection agencies

If a child is suffering significant harm or is likely to do so, a referral must be made promptly to the appropriate statutory children's agency. If an employee has a concern about a child, they should inform their local DSL/safeguarding lead, who will co-ordinate a report to the appropriate local statutory authority, which in England, is the local authority's Children's Social Services.

Referrals and reports to statutory adult protection agencies

Consent to report or refer to a statutory authority will be first sought but in the event of a crime or where an adult is at continuing risk of harm, the DSL will make a report to the police, so long as doing so does not endanger the individual any further.

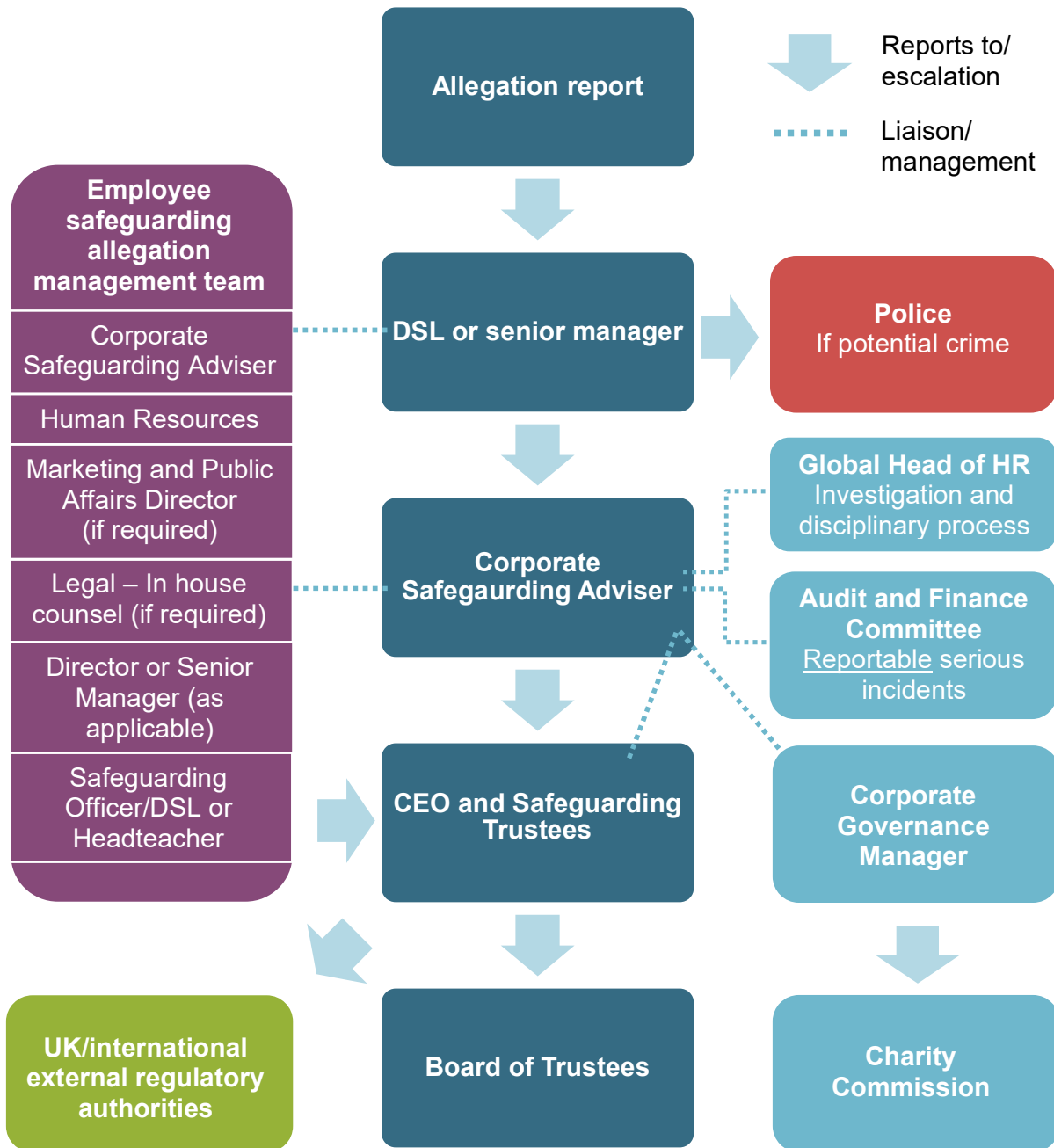
The DSL will arrange either signposting to an appropriate agency who can support the individual and in the case of abuse perpetrated by a staff member, will ensure that the adult has access to effective care and support, in line with local procedures and provisions.

International programmes

Each international programme, our UK independent schools and our National Careers Services have their own safeguarding frameworks, local policy and external reporting procedures, detailing the local

routes of reporting to statutory agencies, which should be followed by employees and the DSL, to ensure that prompt help is provided to a child or adult who has been harmed or is at risk of harm.

Flowchart 2: Employee safeguarding allegation management



**The CSA informs the IT department of any safeguarding incidents relating to all forms of on-line abuse by employees and where Ed Dev Trust’s equipment has been inappropriately utilised.*

***All staff safeguarding allegations and investigation outcomes are reported to the Charity Commission. A report of all reportable serious safeguarding incidents and staff safeguarding allegations and investigation outcomes are made to the Audit and Finance Committee on a quarterly basis.*

Employee safeguarding allegation management

All employees

All safeguarding allegations involving or potentially involving a criminal offence **must be immediately** reported to the police either by the DSL or their senior manager, who will also make a prompt report via MyConcern or directly to the corporate safeguarding adviser.

The Corporate Safeguarding Adviser is responsible for initial fact finding to assess whether an allegation or incident requires further convening of an allegation management panel with support from the Head of Global HR.

The Corporate Safeguarding Adviser, together with the assistance of the Corporate Governance Manager, will report the allegation promptly to Ed Dev Trust's regulator, the Charity Commission, providing prompt updates and a final report.

The Corporate Safeguarding Adviser will report progress and the outcome of the allegation management procedure to the Corporate Safeguarding Committee, who will include a detailed report in the quarterly safeguarding report to the Board of Trustees.

The serious incident report to the Audit and Finance Committee will include all employee dismissals made on safeguarding grounds and subsequent reports to other external regulatory authorities, including the Disclosure and Barring Service.

International employees

For all international employees and international teachers, referrals to relevant authorities in their country of origin will also be made, where applicable. Records of all substantiated and unsubstantiated allegations are retained for reference purposes.

UK school employees

Allegation management of all school employees will follow DfE statutory guidance, 'Keeping Children Safe in Education', September 2020, including prompt reporting by the school's headteacher to the applicable local authority's designated officer for management advice.

Allegations made against the headteacher will be reported by the DSL or member of the school's leadership team to the Head of UK Independent Schools, who will report to the Corporate Safeguarding Adviser. The Corporate Safeguarding Adviser will seek advice from the local authority's designated officer for management advice, and to Education Development Trust's Chief Executive Officer who will inform the school's Proprietor Body (Education Development Trust's Board of Trustees) via the Chair and/or Safeguarding Trustee.

All allegation outcomes

The outcome of all school employee allegation investigations (police and organisational) and subsequent disciplinary procedures will be reported to the Charity Commission.

Substantiated allegations

In the event of a school employee being dismissed on safeguarding grounds, they will be referred to the Disclosure and Barring Service.

In the event of a teacher/headteacher being dismissed on safeguarding grounds, they will be referred to The Teaching Regulation Agency.

Appendix iv: Whistleblowing Safeguarding Concerns

Whistleblowing safeguarding concerns

Education Development Trust is committed to developing a culture where it is safe and acceptable for all employees and stakeholders to raise concerns about poor or unacceptable practice and misconduct. The purpose of the Trust's Whistleblowing Policy and procedure is to assist employees who believe they have discovered malpractice or impropriety in making a disclosure.

Education Development Trust encourages employees and all persons associated with the company who discover information which is believed to show malpractice or wrongdoing within the organisation, to disclose such information as soon as possible. The company recognises that making disclosures can take a lot of courage and confidence and is committed to supporting employees and all persons associated with the company throughout this process.

Safeguarding concerns about children or adult beneficiaries (direct and indirect)

Education Development Trust is committed to providing excellent service to the children and adults we work with and safeguarding their interests is of paramount importance. However, as a company we recognise that concerns may arise in respect of employees/partner conduct towards children or adult beneficiaries, and other adults who may come into contact with us through our work.

Concerns about misconduct towards children or adults should, in the first instance, be directed to your local DSL or line manager, unless the concern involves them when it should be directed to Anna Searle – Education Services Group Director, who is a member of the Corporate Safeguarding Committee, at asearle@educationdevelopmenttrust.com

Procedure

A small team made up of legal, safeguarding and HR expertise will work closely with Anna Searle to investigate all safeguarding concerns reported via the Whistleblowing Policy and procedure, to ensure that prompt and effective is taken. All safeguarding concerns raised via the Whistleblowing Policy and procedure are managed with discretion to conclusion.

Unsubstantiated whistleblowing concerns/incidents and allegations

It is important to raise all safeguarding concerns that impact beneficiaries and may also impact the reputation of the organisation. However, if you raise a concern or make an allegation in good faith, that is then not confirmed by an investigation, the case will be closed and treated with the utmost confidentiality. However, if you make an allegation frivolously, maliciously or for personal gain, it will result in appropriate action being taken against you, including disciplinary action.

Appendix iv: Safeguarding DeclarationTemplate Declaration

The template declaration statement (below) must be replicated and disseminated during induction to all new employees to sign, and a copy retained with their personnel file (hard copy on file or uploaded to a database system, as applicable). A copy must be provided to the employee.

Template:**Declaration Statement by Education Development Trust (the Trust) Employees and Partners (as defined in this policy)**

I state that I understand, and will abide by, the contents of Ed Dev Trust's Global Safeguarding Policy:

Name:

Role:

Line Manager:

Signature:

Date: