
MannionDaniels

Safeguarding Children/Young People, and Vulnerable People Policy

Document Control	
Approved by:	Safeguarding Officer, Board of Directors (Matthew Wiltcher)
Responsible Owner:	Safeguarding Lead, Leadership Team (Rolla Khadduri)
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Purpose

The Safeguarding Children/Young People, and Vulnerable People Policy sets out MannionDaniels' commitment to prevent harm, and to promote the health and wellbeing of children and young people, and of vulnerable people. The document outlines the MannionDaniels' policy for identifying and responding to concerns regarding the safeguarding and protection of these populations. It also provides guidance for Employees, Business Partners, and Representatives with regards to protection of children/young people and vulnerable people from exploitation and abuse of all kinds in the delivery of our programmes and operations. The policy complements and expands on principles set out in the MannionDaniels' Business Code of Ethics; it is part of a suite of measures employed by MannionDaniels to promote and ensure ethical and lawful business conduct.

ISSUE	AMENDMENT & DATE	INITIALS
1.	Compilation of policy and annexes on 19 February 2018	SR
2.	Addition of vulnerable people on 15 April 2018	RK
3.	Revision to integrate outstanding issues on 26 th July 2018	RK

1. Policy Statement

MannionDaniels is fully committed to ensuring the safety and protection of all people we encounter in our work. We understand some populations require even more care due to the power imbalances that exist – hence a Safeguarding Policy that deals specifically with Children / Young People and Vulnerable people. We recognise that children, young people, and vulnerable people who are marginalised have safeguarding needs that require distinct consideration, and we have a duty of care toward them to maintain an equal human rights approach and to adhere to the ‘leave no-one behind’ approach. This includes a duty to protect children, young people, and vulnerable people from harm or risk of harm as a result of: misconduct by our Employees, Business Partners, and Representatives; poor practice; and the poor design or delivery of our programmes and operations.

At MannionDaniels, we have zero tolerance for sexually abusive or exploitative acts being perpetrated by our Employees, Business Partners and Representatives associated with the delivery of our programmes or operations. We promote a culture of openness to enable issues and concerns about safeguarding to be raised and discussed and a sense of accountability among those who work with and engage with us so that potentially abusive behaviour can and will be challenged. This is part of our Business Code of Ethics which describes the ethics and behaviours required of all parties to ensure a robust safeguarding environment. The Business Code of Ethics can be found [here](#).

Whilst the definition of young people and children is around age and therefore more straightforward, we define vulnerable people as those who are marginalised from full participation in social, economic or political life. People can be marginalised due to multiple factors, including: sexual orientation, gender, geography, ethnicity, religion, displacement, conflict or disability. Poverty is both a consequence and a cause of being marginalised. In different contexts, different people can be vulnerable due to the power imbalances existent in that context. We recognize that the first step to any safeguarding policy is to identify who might be more marginalised and therefore vulnerable in each context.

This Safeguarding Children / Young People, Vulnerable People Policy is designed to ensure all who work with and engage with us understand and are supported in meeting safeguarding responsibilities. This includes the mandatory obligation to report a concern, allegation or disclosure, and awareness of the mechanisms in place to do so. We take positive action to prevent anyone who might be a risk to children, young or vulnerable people from becoming involved with us and take stringent measures against any Employees, Business Partners, and Representatives who perpetrate an act of violence against a child and young person.

We aim to achieve this through compliance with United Kingdom (UK) law, relevant laws in each of the countries where we operate and by adhering to the United Nations Convention on the Rights of the Child 1989.

2. Scope

This policy applies to all persons working for MannionDaniels or on behalf of the company in any capacity, including Employees (whether permanent, fixed-term or temporary), Business Partners, and Representatives whether located in the UK or abroad. MannionDaniels and all persons working for or on behalf of the company in any capacity are expected to comply with national and local legislation safeguarding children and young people and international standards, whichever gives greater protection, and with UK legislation as applicable. Legislation relating to the

protection of safeguarding is set within different frameworks across the UK. Some of the key legislation and guidance are: Children Act 2004; the Protection of Children (Scotland) Act 2003, The Social Services Wellbeing (Wales) Act 2014, Female Genital Mutilation Act, 2003 as amended by the Serious Crime Act 2015; Her Majesty's Government Working Together to Safeguard Children Guidance and the Equality Act 2010

3. Definitions

“Abuse” means including, but not limited to, physical, sexual, emotional, neglect, bullying, or forced labour.

“Business Partner” means any contractor, subcontractor, grantee, vendor, supplier, or organisation providing goods or services to the Company.

“Child” in line with the United Nations Convention on the Rights of the Child and for the purposes of this policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1).

“Child protection” is a part of safeguarding and promoting welfare and refers to the activity that is undertaken to protect specific children who are suffering, or are at risk of suffering, significant harm.

“Employee” means any person who has a part-time, full-time, intermittent, continuous or fixed-term employment relationship with the Company.

“Emotional Abuse” means subjecting or exposing another person to behaviour that may result in physical or psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.

“Harm” means any detrimental effect on a child's or young person's physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

“Physical Abuse” means where a person deliberately injures or threatens to injure, including slapping, punching, shaking, kicking, burning, or grabbing.

“Safeguarding” is broader than “child protection” and means the responsibilities, preventative, responsive and referral measures undertaken to protect children and young people, ensuring that no child or young person is subject to any form of abuse or harm as a result of their association with the company.

“Sexual abuse” means sexual assault or acts to which a person did not, or could not, consent. We recognise that sexual abuse can happen to men or women. People can be sexually abused by people of the same sex or the opposite sex.

“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 harassment” is unwanted conduct of a sexual nature. It has the purpose or effect of violating the dignity of a person. It creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Sexual harassment includes: written or verbal comments of a sexual nature, such as remarks about an employee's appearance; questions about their sex life or offensive jokes; displaying pornographic or explicit images; emails with content of a sexual nature; unwanted physical contact and touching; sexual assault. Something can still be considered sexual harassment even if the alleged harasser didn't mean for it to be. It also doesn't have to be intentionally directed at a specific person.

“Sex Tourism” means the sexual exploitation of individuals, including children, by people who travel, usually from a developed country to a less developed country, to engage in sexual acts.

“Representative” means an employee or any person who has an independent individual contractual relationship with the Company, whether as a contractor, consultant or agent of the company. This includes non-executive directors of the board.

“Vulnerable” refers to a state in a specific context that means the person(s) is more marginalised, due to any number of factors (e.g. disability, conflict, gender, age, sexual orientation). This person is marginalised from full participation in social, economic or political life.

“Working with Children and Young People” means being engaged in an activity with a child or young person where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity.

“Young Person/People” or “Youth” in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of ‘children’, ‘adolescents’ and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

4. Guiding Principles

This policy is underpinned by the following set of principles that guides its implementation:

- The well-being and welfare of children, young people and vulnerable adults are paramount. All children and young people aged under 18 years, and vulnerable people have equal rights to protection from all forms of abuse regardless of gender, ethnicity, disability, sexuality or beliefs as declared in the United Nations Convention on the Rights of the Child.
- All children and young people should be empowered and encouraged to fulfil their potential. Decisions made about children and young people will be made as far as possible with their participation and in their best interest giving full consideration to how such decisions will affect them.
- Zero tolerance for sexual harassment, abuse and exploitation including sexual tourism. Furthermore Inequality, exclusion, and discrimination will be challenged and will not be tolerated.

- Treat all beneficiaries and partners – regardless of age, ethnicity, disability, gender, sexual orientation, or any other differentiating factor - fairly and with respect and integrity, and to be aware of the power over beneficiaries by virtue of the engagement with MannionDaniels.
- Recognise that there are potential risks to children and young people in some areas of our work and we will manage these risks across our programmes and business operations.
- Promote recruitment practices that select those who share our ethical considerations of human rights, and minimise the risk of engaging Representatives who may pose a risk to Children and Young People.
- Respect the privacy and confidentiality of children and young people associated with our work. Seek informed consent as appropriate from parents, children or young persons.
- Employees, Business Partners, and Representatives working with the Company are responsible for adhering to the Company’s business code of ethics, the Safeguarding Children/Young people and Vulnerable People Policy, and other complementary policies.
- Effective management for staff through clear processes, supervision and support.
- Any form of abuse is unacceptable and may result in disciplinary action including termination or referral to local law enforcement authorities, as appropriate.
- Appropriate whistle-blowing procedures as outlined in our Whistle-blowing policy, and a culture that enables issues about safeguarding and promoting the welfare of children/young people, and vulnerable people to be addressed.
- A commitment to providing due process in accordance with applicable procedures when responding to any concerns or allegations related to actual or potential sexual abuse and exploitation of children, young people and adults.

5. Safeguarding Children, Young and Vulnerable People Framework

The framework comprises of several areas across our business that are essential to promote a safeguarding environment that protects all children, young people and vulnerable adults. These areas are as follows:

- a) **Safeguarding Culture:** This overarching Safeguarding Policy describes our approach to safeguarding and indicates the related policies and processes where safeguarding is implemented through our People, Systems and Programmes
- b) **Governance and Accountability:** Our Board has ultimate responsibility for safeguarding and will act in the best interests of the beneficiaries, staff and other stakeholders. The Board will act independently in its oversight of Safeguarding practises and decision making. A board director is the designated Safeguarding Officer for the company. A senior safeguarding lead has been appointed within the Leadership Team who is responsible for the Policy and its implementation. Each corporate department has assigned policies which include some responsibility for safeguarding to be integrated into our systems. These have been clearly identified and signposted within this policy. Finally, within our delivery teams a nominated Safeguarding focal point has the responsibility for supporting delivery teams and coordinating activities.
- c) **Business Code of Ethics:** Our Business Code of Ethics sets out the values, business culture and practices that we aim to demonstrate and expect of all our partners,

suppliers and consultants throughout our supply chain. It is designed to create a culture of best practise for all staff and partners which is vital to addressing Safeguarding Risks.

- d) **Whistleblowing:** The Whistleblowing Policy is essential to delivering our commitment to upholding ethical values and practices. The Whistleblowing policy underpins our commitment to ensuring Employees, Business Partners and Representatives can feel comfortable raising concerns without fear of retribution, and to provide a transparent and confidential process for dealing with concerns including, but not limited to: safeguarding, corruption, fraud, human trafficking, slavery, health and safety and terrorism funding.
- e) **Human Resources:** A set of HR policies support our commitment to and implementation of safeguarding. In particular our Recruitment and new starter policy supports the organisation to recruit the right people and provide a framework for induction to our policies and the identification of ongoing training needs. The recruitment and new starter policy outlines the vetting processes required to address the competencies required for different jobs. In particular, to identify enhanced requirement where roles have a greater exposure to safeguarding risks.
- f) **Risk Management:** The company approach to risk management in the delivery of our business defines the level to which safeguarding risks will be prevalent, and the approach to identifying and managing those risks. The Risk management policy sets out company level risk matrix which is regularly monitored by the leadership and senior management teams incorporating safeguarding. Each project is required to have a risk register with clearly identified owners and mitigating actions. Risks are escalated through contract management channels or escalated to the responsible manager.

6. Implementing the Policy

The Safeguarding Officer is part of the Board of Directors (Matthew Wiltcher). The Safeguarding Lead is part of the Leadership Team (Rolla Khadduri). Below are the following identification of roles to implement this Safeguarding Policy:

Safeguarding Lead

- Responsible for rolling out the policy within company practice.
- Responsible for ensuring incidents are fully investigated and acted upon.
- Responsible for maintaining an up-to-date database of safeguarding incidents across the company.
- Responsible for reporting safeguarding incidents to the Safeguarding Officer.
- Responsible for ensuring safeguarding incidents are reported to clients according to contracts.
- Responsible for discussing safeguarding incidents at Leadership Team meetings.

Safeguarding Officer

- Responsible for discussing safeguarding incidents at Board meetings.
- Responsible for providing advice to Safeguarding Lead on action following incidents.

6.1 People

We expect everyone at MannionDaniels to take responsibility for acting appropriately to promote a culture of safeguarding within our Programmes or Business Operations. Everyone, regardless

of role or the functional area within which they operate, must be vigilant concerning the signs and indicators that a person may have been abused or is at risk of abuse. They should know what to do about concerns, allegations and incidents to make or keep a child, young person or vulnerable person safe from harm.

In line with our Business Code of Ethics, all MannionDaniels Employees, Business Partners and Representatives shall:

- commit and contribute to an environment where everyone feels respected, supported, safe and protected, regardless of age, disability status, ethnicity etc;
- never act or behave in a manner that results in abuse of child or young person or places a child or young person at risk of harm;
- agree, by signing and complying with MannionDaniels' Business Code of Conduct, Safeguarding Children and Young People Policy, and other complementary policies; and
- Report and respond to safeguarding concerns and breaches.

In addition, Employees are expected to comply with the Safeguarding Code of Conduct (Annex 1) found in Annex 1.

Board of Directors

The MannionDaniels Board of Directors approve this policy and retain an overview of all safeguarding issues and the Company's response to them. This includes any concern, allegations and incidents of safeguarding and how these are being managed. A board director is the designated **Safeguarding Officer** for the company (Matthew Wiltcher). The Board will act independently in its oversight of Safeguarding practises and decision making throughout the company. Board meetings include standing agenda items covering major risks areas including safeguarding, fiduciary, governance and other risks to operations.

Leadership Team

A member of the of MannionDaniels' Leadership Team is appointed as the **Safeguarding Lead** (Rolla Khadduri) and is responsible for the implementation of the safeguarding policy. The leadership team foster open and transparent safeguarding culture and provide guidance in response to incidents, allegations and concerns regarding the safeguarding of children, young people and vulnerable adults. The leadership team is responsible for reviewing all concerns from whatever source. All reports or concerns are referred to the **Safeguarding Lead** or a member of the leadership team. The Safeguarding lead is the focal point for managing concerns and investigations and reporting to the Board of Directors on cases. The Leadership Team will note trends and developments in safeguarding issues. The Safeguarding Lead will liaise with managers to ensure we maintain a fit for purpose safeguarding policies and response to any concerns, allegations and incidents.

Senior Managers

Senior Managers are responsible for managing corporate functions, departments and programme delivery functions. Senior managers have responsibility for the implementation of various company policies which incorporate Safeguarding responsibility, such as HR, Fiduciary Risk & Due diligence, Project Operations, Compliance and Technical & Learning. The managers are also responsible for encouraging an open and transparent way of working that facilitates a strong safeguarding culture within their teams and more generally within the Company. They oversee and ensure that Employees, Business Partners, and Representative work within the framework of this policy. Senior Managers will coordinate with Safeguarding Lead and Safeguarding Focal

points within projects on implementing safeguarding activities and any concerns, incidents, and allegations raised.

Safeguarding reporting

MannionDaniels' **Safeguarding Lead** is the designated point of contact for any concerns that are raised, from any source. They play a key role in coordinating and tracking the company response and to ensure the incident reporting procedures are followed.

Safeguarding Focal Point in Programme Delivery

Each Programme being delivered by MannionDaniels has a safeguarding focal point assigned from within the project delivery team. The Safeguarding Focal point is responsible for ensuring safeguarding activities are integrated into project operations and systems and supporting project teams to carry out tasks and activities, such as risk assessments, procurement activities etc.

6.2 Systems

Risk Assessment and Risk Management

Risk assessment and monitoring forms the basis of the approach to identify and mitigate safeguarding risks. Risk assessments are integrated into business operations at various stages of the business cycle. At the project level risk, the systems for risk assessments are as follows:

- a) **Solicitation stage:** (Business development projects or Funding Round Applications): Risks of prospective projects are considered throughout the business process. Safeguarding aspects are incorporated into risk assessment prior to projects being implemented. For example:
 - i. Review of funding round applications: Safeguarding is considered, and risks identified part of the reviewer's assessment
 - ii. Bid development: Safeguarding risks are considered and designed into the management and technical approach being designed. Risks are incorporated into the risk assessment through the standard project risk matrix
- b) **Implementation:** All projects are required to have a risk matrix to manage ongoing risks. Where there are multiple downstream delivery partners of Grants monitoring processes are updated to incorporate ongoing review of Safeguarding measures. Monthly meetings are held to monitor the risk matrix and review delivery issues including safeguarding concerns, alongside fraud and other issues.

Due Diligence Process

The due diligence process provides a structured methodology for assessing the risk of engaging with a Business Partners (e.g. downstream partner organisations, vendors, suppliers and other contractors or grantees). At the pre-contract due diligence stage, we undertake due diligence which includes a risk-based assessment of safeguarding standards or issues that may arise based on the work to be undertaken. MannionDaniels assess the capacity of partner organisations against set criteria to make a judgement on the risk of associating with that entity. The due diligence assessment will include a risk-based assessment and recommendations.

Procurement

The procurement policy provides a framework and procedures for the procurement of downstream partner organisations, vendors, suppliers and other contractors. The identification

of a procurement need and the development of the spec will outline and enhanced requirements for safeguarding controls.

Recruitment

MannionDaniels has strong recruitment practices that minimise the risk of engaging Representatives who may pose a risk to children /young adults, and vulnerable people. During the need identification stage for each position, MannionDaniels assesses and determines whether it will involve working or contact (directly or indirectly) with children and young people. Recruitment for all positions include robust application processes, screening, interviewing and selection protocols and vetting procedures such as reference checks and review of identity checks. All offers are dependent on satisfactory references which are mandatory as part of the new starter process.

For positions that involve working with and/or contact (directly or indirectly) with children, young adults and vulnerable people, more detailed recruitment processes will be implemented.

Interviews for positions involving work with children and young people will have behavioural based questions and verbal reference checks. In addition, a thorough background check will be conducted including a detailed history of employment and education to confirm that selected candidates possess relevant qualifications and present no increased risks. Criminal record checks will be undertaken before engagement and, once engaged, every 5 years, covering a five-year history, and obtained from any country in which the candidate resided for more than 12 months over that period as well as from all the individual's countries of citizenship. Where criminal checks cannot be obtained from the countries required or are not of adequate reliability, candidates will be required to sign a statutory declaration or legal equivalent.

As part of the induction process specific ethical training or other specific training needs will be identified.

6.3 Programmes

MannionDaniels deliver a range of projects and programmes. This includes:

- In-country programmes situated in developing countries
- Short term technical assistance projects and assignments in sub-Saharan Africa and South Asia
- Fund Management Programmes funding grantees working across sub-Saharan Africa, South Asia Central and South America

Company policies are integrated into projects through the Contract Management Policy, Project Management toolkit and Fund Management Process. Key approval points are in place to monitor project delivery and escalate risks, including potential safeguarding concerns, such as:

- Contract start-up
- Project initiation document
- Risk Matrix
- Issues Tracker
- Change management control

Depending on the project being implemented, and the requirements for that project, there will often be the need for specific protocols to be developed which go beyond this policy. Project level protocols will be developed in conjunction with the people described in section 6.1. Where additional protocols improve operations, the Safeguarding lead may decide to update the policy.

Any project level protocols will be approved by the Safeguarding lead for compatibility with this policy and to ensure minimum standards as set out in this policy are consistently met.

6.4 How to Seek Guidance and Raise Concerns

Advice and guidance in relation to this policy can be obtained preferably from the Safeguarding Lead but also from a senior manager, a Director, the Human Resources Manager or Operations and Compliance Manager.

All Employees, Representatives and Business Partners anywhere in the world, are expected to report any concerns, allegations and incidents of safeguarding regarding young Children / Young People, and Vulnerable People. Reports of concerns, allegations and incidents should be raised directly with the Human Resources Manager or Operations and Compliance Manager using the the Incident Reporting Form (Annex 2). The Human Resources Manager or Operations and Compliance Manager are in turn required to treat the matter seriously and confidentially and escalate the issue immediately to the Safeguarding lead. In some circumstances MannionDaniels will be obliged to report information to appropriate external authorities. This will be determined by the Safeguarding lead in consultation with the Leadership team. In the event that, an Employee, Representative or Business Partner feels unable to report the matter through the channels above, they may utilise the anonymous, free-to-call and confidential [Whistleblowing Service](#).

Any concerns raised, allegations made and incidents reported in good faith will be treated seriously and will be investigated as set out in this Policy and in compliance with all applicable U.K. legislation any other comparable legislation overseas.

Response to Concerns Raised

The Safeguarding lead in consultation with the Leadership Team and the HR manager will ensure all reports of concerns, allegations and incidents are investigated.

MannionDaniels is committed providing due process when responding to concerns or allegations related to child exploitation and abuse. Any Employee who breaches this policy will face disciplinary action, which could result in dismissal. We may terminate our relationship with Representatives and Business Partners working on our behalf if they breach this policy.

Those raising concerns will be regularly informed of the progress of the investigation, unless the report is raised anonymously or the person raising the concern does not wish to be kept informed.

All safeguarding children / young people and vulnerable people matters will be dealt with confidentially; however, it should be noted that the company cannot guarantee confidentiality as there may be legal requirements to disclose information relating to a matter raised.

Training and Support

MannionDaniels will provide safeguarding children / young people, and vulnerable people training during induction of Employees and will share and review our policy with Business Partners and Representatives. On-going training and staff development on safeguarding and protection will also be undertaken. The frequency of on-going Employee training will be determined by factors such staff attending training, understanding of policies and procedures, and incidence of concerns and their subsequent disposals. Service specific safeguarding children and young people training will also be available for Employees, Business Partners, and Representatives where medium to high risk are identified as part of Programmes and Business Operations.

Monitoring and Compliance

We will monitor and track compliance with this policy by:

- Ensuring Employees, Business Partners and Representatives have access to the Business Code of Ethics, this policy and other complementary policies;
- Ensuring and tracking that Employees are informed during induction about the importance the organisation places on our safeguarding responsibilities;
- Maintaining and reviewing records relating to the safeguarding policy and processes outlined above;
- Tracking and auditing of the implementation of the safeguarding children policy and practices
- Regularly assessing the frequency and relevance of the training available; and
- Raising awareness and increasing understanding of safeguarding issues on a regular basis.

7. Review of the Safeguarding Children and Young People Policy and Framework

The Safeguarding Children /Young People, and Vulnerable People Policy will be reviewed on an annual basis, or more frequently if changes to the operating or legal environment justify a review. The company level safeguarding children and young people risk evaluation will consider the adequacy of the policy and framework in terms of its design and operational effectiveness. These periodic company level safeguarding children and young people risk evaluations complement the programme specific risk assessments that are carried out.