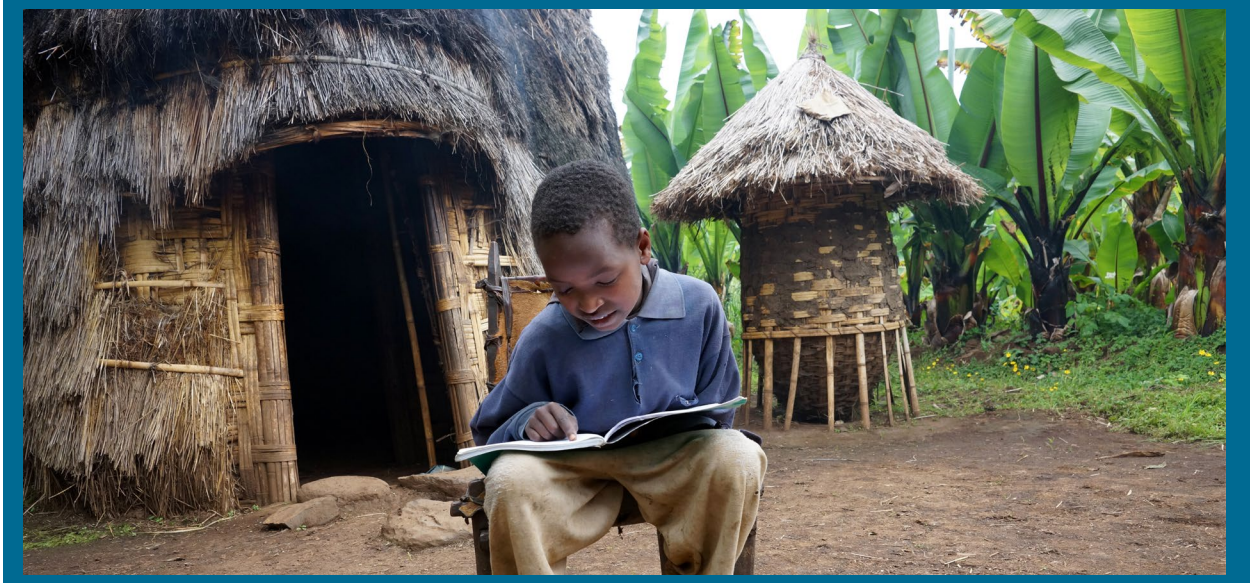


SAFEGUARDING POLICY

Orbis Charitable Trust



Purpose

The purpose of this policy is to protect people particularly children, vulnerable adults and beneficiaries from any harm that may be caused from their coming into contact with Orbis UK. This includes harm arising from:

- The conduct of staff or personnel associated with Orbis UK
- The design and implementation of Orbis UK's programmes and activities

The policy lays out the commitments made by Orbis UK and informs staff and associated personnel¹ of their responsibilities in relation to safeguarding. Orbis recognizes its duty of care and ensures that concerns the organisation has about child or vulnerable adult's safety within the communities in which we work are reported to the appropriate authorities.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Orbis UK's Anti-Bullying and Anti-Harassment Policy

What is safeguarding?

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights; enabling them to live free from harm, abuse, exploitation and neglect.²

¹ See 'Scope' for definition of associated personnel

² NHS 'What is Safeguarding? Easy Read' 2011

In our sector, we understand it to mean preventing and responding to harm to people, including children and vulnerable adults, that arises from coming into contact with our staff or programmes and our duty of care to respond to/report known harm.

Further definitions relating to safeguarding are provided in the glossary below.

Scope

- All staff (employed full, part time or temporary) contracted by Orbis UK
- Associated personnel whilst engaged with work or visits related to Orbis UK, including but not limited to: consultants, trustees, volunteers, contractors, programme visitors including journalists, celebrities and politicians
- The Designated Person for supporting and maintaining safeguarding compliance in Orbis UK is the Governance & Compliance Manager

Policy Statement

Orbis UK believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation, ethnic origin or religious belief has the right to be protected from all forms of harm, abuse, neglect and exploitation. Orbis UK has a zero tolerance of harm, abuse, neglect and sexual or other exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies below).

Orbis UK commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

Orbis UK promotes an open and transparent safeguarding culture. Training on safeguarding, whistle-blowing and bullying and harassment will be given to all new employees and refreshed periodically for all staff.

Where necessary this policy will be translated into the local language(s) where it is applied and adapted to be clearly understood.

Prevention

Orbis UK responsibilities

Orbis UK will:

- Ensure all staff and associated personnel have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Orbis UK. This includes

the way in which information about individuals in our programmes is gathered and communicated

- Monitor risk from programme planning and incorporate safeguarding risk measurement into the organisation wide risk process
- Ensure partner organisations have minimum standards for safeguarding in place which comply with Orbis UK's safeguarding standards and risk assessments or ensure any areas of non-compliance are rectified or described for rectification before, or within an agreed period after, the start of the project
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel, including, but not limited to references from HR of previous employers, DBS checks where applicable or overseas criminal record checks.
- Ensure staff and associated personnel receive education & training on safeguarding at a level commensurate with their role in the organisation on an on-going basis
- Monitor use of its computer systems and networks to ensure there is no violation of any applicable law or Orbis UK policy including those covering safeguarding, equal opportunities, racial and sexual harassment, discrimination, confidentiality, copyright and proprietary rights, publications, bullying, data protection and privacy; and/or any use that may potentially cause any damage, PR risk, legal or other liabilities to Orbis UK or its people
- Protect staff, associates, partners and volunteers from malicious or frivolous complaints
- Follow up on reports of safeguarding concerns promptly and according to due process, ensuring a commitment that all responses will be survivor-centred

Safe Project

Orbis UK are committed to making projects as safe as possible for beneficiaries and all those we come into contact with. We will work with downstream partners with the aim of meeting recommended safeguarding practices in project planning, design, risk assessment, budgeting and implementation:

- Orbis UK; maintains details on incident reported to it by downstream partners and can provide detailed feedback on incidents in specific areas, in specific timeframes
- Conducts regular monitoring on implementation of Safeguarding measures, training and review in projects

Staff responsibilities

Child safeguarding

Orbis UK staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

- Use images and stories of children & vulnerable adults which pose potential protection-related risks for Orbis UK. The informed, written consent of the child/vulnerable adult and/or parent/guardian should always be obtained before a photograph or image, or information is used, and its intended and/or possible use(s) explained. Images must not include any personal information that could identify the subjects name or location. The best interests of beneficiaries are to be prioritised over opportunities to enhance public profile

Adult safeguarding

Orbis UK staff and associated personnel must not:

- Sexually abuse or exploit at risk/ vulnerable adults
- Subject a vulnerable adult to physical, emotional or psychological abuse, neglect, or harm

Protection from sexual exploitation and abuse

Orbis UK staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries
- Engage in any sexual relationships with beneficiaries, since they are based on inherently unequal power dynamics

Additionally, Orbis UK staff and associated personnel are obliged to:

- Treat all children, vulnerable adults, beneficiaries, community partners, volunteers and colleagues with respect and courtesy in accordance with international and national conventions, standards of behaviour and in line with Orbis UK's values of Trust, Accountability, Excellence, Caring and Commitment
- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by an Orbis UK staff member or associated personnel to an appropriate staff member
- Associated personnel are obliged to be supervised and accompanied by staff when coming into contact with children or vulnerable adults
- Abide by the duty of care to report any concerns the organisation has about child or VA's safety within the communities in which Orbis works to the appropriate authorities
- In the case of a possible consensual or proper relationship, advise the Orbis International Chief of Program of the need for special considerations for Orbis Staff or partner staff in a personal relationship with a beneficiary and upon assessment the Chief of Program will determine if special considerations are appropriate

Enabling reports

Orbis UK will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing will be protected by Orbis UK's Protection Against Negative Treatment in the Whistleblowing Policy.

Orbis UK will also accept complaints from external sources such as beneficiaries, members of the public, partners and official bodies.

How to report a safeguarding concern

Staff members who have a complaint, concern or had an allegation made against them relating to safeguarding should report it immediately to their Designated Person for Safeguarding or line manager. Reports can be made by email, verbally and followed up with details in writing or via the Incident Reporting Process. If the staff member does not feel comfortable reporting to their Designated Person for Safeguarding or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a senior manager or the Chairman of Trustees where the concern relates to the CEO.

Reports can also be made via the Orbis Ethics and Compliance Hotline. The Hotline also allows for anonymous reporting where allowed by law; however, an anonymous report may be more difficult to investigate, or provide feedback on.

For instructions on reporting online, or via the telephone, go to:

<https://secure.ethicspoint.com>

Response

Orbis UK will: follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns in Whistle-blowing and Grievance Policies) and carry out an investigation process as in Appendix 2. The process will include:

- Acknowledgement of concern and launching initial investigation within 2 working days
- If being reported from a Programme area via OI, an investigation to form within 48 hours made up of local staff, OI representatives and others co-opted as necessary
- An initial outcome from the investigation should be released within 20 working days, with ongoing progress reported to stakeholders until completion
- Where the suspected staff is of a partner organisation, Orbis will offer assistance and support to the partner organisations investigation. Orbis will require suitable updates on progress to completion
- Complaints against Orbis staff will be investigated according to associated Orbis policies
- All investigations will be timely, unbiased and focused on the needs of the survivor
- The organisation ensuring that lessons are learned from safeguarding issues raised and associated responses/reviews and that these will inform organisational, policy and programme development.
- Offering support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation).
- Reporting matters which may be criminal in nature to the police, in line with a survivor centered approach. Decisions regarding support will be led by the survivor.

All timescales are indicative, and subject to alteration according to requirements and limitations. Appropriate disciplinary measures will be enforced against staff found in breach of policy and appropriate responses/sanctions to non-staff. Sanctions may be applied to dismissal in line with HR policies and employment law.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should be kept secure at all times.

Associated Policies (including but not limited to):

- Code of Conduct
- Anti-Bullying and Anti-Harassment policy
- Whistleblowing policy
- Grievance Policy
- Incident Reporting Policy & Procedure
- Procedures for safeguarding in staff recruitment
- Disciplinary Procedure
- Vulnerable Persons Policy
- Information Technology Policy

All the above policies are contained within the Staff Handbook.

Monitoring & Review

Orbis will ensure that implementation of the safeguarding policy is subject to regular monitoring and will review the policy every two years (although changes may be made prior to formal review should legal, policy or best practice changes suggest this is necessary, or in response to a review of a serious safeguarding incident).

International standards for safeguarding will be detailed in the procedures that will be developed to accompany this policy and should be used as a guide when monitoring implementation of the Safeguarding Policy – the aim is to ensure all offices meet these standards.

The Designated Person responsible for safeguarding will support and maintain an overview of implementation and compliance issues.

Safeguarding is an integral part of Orbis UK's risk management processes, including regular review by the Senior Management Team, Board and appointed sub-committees. The Board approved Safeguarding Management Group, chaired by the Designated Safeguarding Trustee meets regularly and reports to the Board on all safeguarding matters.

Glossary of Terms

Beneficiary

Someone who directly receives goods or services from Orbis UK's programmes. Note that misuse of power can also apply to the wider community that Orbis UK serves, and also can include exploitation by giving the perception of being in a position of power

Child

A person below the age of 18

Harm

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

Neglect

The failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions in the context of resources reasonably available to the family or caretakers and causes or has a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children & vulnerable adults from harm as much as is feasible

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect³

In our sector, we understand it to mean preventing and responding to harm to people, including children and vulnerable adults, that arises from coming into contact with our staff or programmes

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery

³ NHS 'What is Safeguarding? Easy Read' 2011

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves

Vulnerable adult

Sometimes also referred to as an At Risk Adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation

I, _____ understand and agree to abide by the above principles and Orbis UK's Safeguarding Policy and Code of Conduct. I understand that any breaches of the above Code will be reported to the Designated Person and appropriate action in accordance with the policies and procedures in place will be taken.

Signature: _____

Date: _____

Appendix 1. Orbis UK Code of Conduct

At Orbis UK, we are part of a larger network working together internationally to fight avoidable blindness. We share a common vision, values, common

philosophies, and to an extent, common working practices.

As we work to achieve our ambition of reducing avoidable blindness across the world, we should always remain true to our core mission, aims and

values. This Code of Conduct will help you by providing guidance in the face of ethical dilemmas. It shows you what to do when a situation is complex by providing standards and values to follow and how to protect against situations that may damage you or Orbis. It also seeks to ensure that employees avoid using possible unequal power relationships for their own benefit.

The rules and guidelines contained in this Code of Conduct, together with the policies and procedures in the staff handbook and the terms and conditions of your employment (as outlined in your employment contract) provides a framework in which all Orbis UK employees, regardless of location, undertake to discharge their duties and to regulate their conduct. They also support Orbis UK in our role in implementing, monitoring and enforcing these standards.

The Code does not exempt anyone and in accordance with Orbis UK's policies and procedures, any breach may result in disciplinary action (including dismissal in some instances), and in certain cases could lead to criminal prosecution.

In accepting your appointment, you undertake to discharge your duties and to regulate your conduct in accordance with the requirements of this Code, thereby contributing to Orbis UK's quality of performance and reputation. The code describes what Orbis UK expects from its employees and what the employees can expect from Orbis UK.

Whilst recognising that local laws and cultures differ considerably from one country to another, Orbis is committed through this Code of Conduct and other policies to operating to the highest standards in a consistent manner in all the areas in which we work.

This Code is subject to local law, wherever the employee is employed and shall be read in a manner that is compliant with that law.

Code of Conduct: Standards and Values

At Orbis UK, we are driven by our values of Trust, Accountability, Excellence, Caring and Commitment.

As an Orbis UK employee I will:

Ensure that my conduct is consistent with the values which Orbis UK embodies.

Uphold the integrity and reputation of Orbis UK by ensuring that my professional and personal conduct is demonstrably consistent with Orbis UK's values and standards.

Seek to maintain and enhance public confidence in Orbis UK by being accountable for the professional and personal actions I take and ensuring that I manage the power that comes with my Orbis UK position with appropriate restraint.

Whilst observing the requirements of the Code of Conduct, I will also be sensitive to, and respectful of, local customs and culture, even if the norms and values in that cultural context differ from the Code of Conduct. I will if necessary, seek (and will receive) support and advice from Orbis UK.

Not work under the influence of alcohol, use or be in possession of illegal substances on Orbis UK premises, vehicles or accommodation.

Treat all people with respect and dignity, challenging any form of harassment, discrimination, intimidation, exploitation or abuse.

Recognise Orbis UK staff, hold a privileged position of power and trust in relation to our partners and the communities that we come from and serve. When carrying out Orbis UK's mission I understand that it is important not to abuse my own position of power/unequal power relationships in any way.

Recognising my role in Orbis UK's mission, I will respect all peoples' rights, including children's rights. I will contribute to a working environment characterised by mutual respect, integrity, dignity and non-discrimination.

Ensure that my relationships and behaviour are not exploitative, abusive or corrupt in any way, and I will not engage in any form of sexual abuse or exploitation of any persons of any age.

In line with international standards, not have sexual relations with children (defined as under 18 years old) or with beneficiaries (in exchange for assistance or any other reason) recognising the inherent unequal power dynamics involved, and that such behaviours can undermine the integrity and credibility of Orbis UK's work.

Not exchange money, offers of employment, employment, goods or services for sex or sexual favours, nor any other forms of humiliating, degrading or exploitative behaviour, understanding that these standards exist to challenge sexually exploitative and abusive behaviour.

Report any such behaviours or malpractice in the workplace by others to my line management.

Perform my duties and conduct my private life in a manner that avoids possible conflicts of interest with the work of Orbis UK.

I will declare any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact on the work of Orbis UK (e.g. contract for goods/services, employment or promotion within Orbis UK, partner organizations, beneficiary groups).

Advise Orbis UK of any intention to seek a nomination as a prospective candidate or another official role for any political party or public office to clarify whether any conflict, or perceived conflicts, with my duties with Orbis UK may arise.

Even when the giving and acceptance of gifts is normal cultural practice, I will reject monetary gifts or inappropriate gifts from governments, beneficiaries, donors, suppliers and other persons, which have been offered to me as a result of my employment with Orbis UK. Where the giving and acceptance of gifts is normal cultural practice, I will ensure that such gifts are within the limits of reasonable judgements and in accordance with procurement policies and I will report gifts to the line management and where appropriate hand them onto Orbis UK.

Assure that assistance by Orbis UK is not provided in return of any service or favour from others.

Act against any form of corruption and not offer, promise, give or accept any bribes or inducements.

Be responsible for the use of information, equipment, money and resources which I have access to by reason of my employment with Orbis UK.

Use my discretion when handling sensitive or confidential information.

Seek authorisation before communicating externally in Orbis UK's name and will avoid any unintended detrimental repercussions for me or Orbis UK.

Appropriately account for all Orbis UK money and property, (e.g. vehicles, office equipment, Orbis UK-provided accommodation, computers including the use of internet, email and intranet).

Protect the health, safety, security and welfare of all Orbis UK employees, volunteers and contractors.

Undertake and act on appropriate risk assessments.

Comply with local security management guidelines and be pro-active in informing management of any necessary changes to such guidelines.

Behave in such a way as to avoid any unnecessary risk to the safety, health and welfare of myself and others, including partner organisations and beneficiaries.

Contribute to preventing all forms of criminal or unethical activities.

Inform Orbis UK of any relevant criminal convictions or charges I have had prior to my employment in which Orbis UK may have a legitimate interest.

Notify Orbis UK if I face any criminal charges during my employment that may impede my ability to perform the duties of my position subject to national legislation.

I will adhere to the following policies and procedures (see list below) that support the above standard:

Safeguarding Policy	Page 23
Bullying and Harassment Policy	Page 35
Grievance Policy	Page 56
Equal Opportunities& Diversity	Page 69
Travel Procedures Policy	Page 69
Travel & Risk Assessment Policy	Page 69
Anti-Bribery Policy, Anti-Fraud and Anti Corruption Policy	Page 42
Fundraising Policy for the Vulnerable	Page 53
Whistle-Blowing Policy	Page 64
Use of Resources Policy	Page 70
Appropriate standards of behaviour in The staff handbook	Page 33

And any other relevant policies in the staff handbook, or which stand-alone.

Appendix 2. Safeguarding Incident Investigation Process

(All timelines are indicative and subject to change according to circumstance)

