

# Safeguarding Policy:

## Safeguarding Children and at-risk Adults

Policy Owner: Director of Safeguarding

### Version Control:

Version	Author	Changes	Date	Reviewed and approved by	Approval Date
V.1.0	Jana Sillen, Director of Safeguarding	New policy	April 2022	Board of Trustees	15/06 2022
		Review policy	Dec 2022		
		Review Policy	Sep 2025	Board of trustees	11/09/2025

**The purpose of this Safeguarding Policy is to protect people, in particular children and at-risk adults, from maltreatment or harm caused by our staff, associates, programmes or operations.**

This Policy applies to all contracted Penny Appeal staff, and everyone associated with Penny Appeal, specifically:

1. All contracted staff: permanent and temporary members of staff
2. Those associated with Penny Appeal (associates'):
  - o The Board of Trustees
  - o Volunteers and interns
  - o Consultants and contractors
  - o Agency staff
  - o Penny Appeal Ambassadors
  - o Project visitors, including our donors, journalists and the media, contractors, celebrities and politicians
  - o Any other persons or organisations representing Penny Appeal, however briefly
  - o Partners, vendors and other third parties, where it is included or referenced in relevant bid or tender documents, agreements, memorandums, purchase orders or contracts
3. All contracted staff and associates at Penny Appeal Country Offices in Pakistan, Palestine and Yemen.

This Policy does not apply to our affiliate offices based in the United States of America, Canada, the Middle East, Australia or South Africa, as these offices are separate legal entities and have their own policies consistent with Penny Appeal's standards.

## Table of Contents

<b>PURPOSE.....</b>	<b>3</b>
<b>WHAT IS SAFEGUARDING? .....</b>	<b>4</b>
<b>POLICY STATEMENT.....</b>	<b>4</b>
<b>GUIDING PRINCIPLES.....</b>	<b>5</b>
<b>SCOPE .....</b>	<b>6</b>
<b>APPROACH.....</b>	<b>7</b>
<b>PILLAR 1: PREVENTION .....</b>	<b>7</b>
<b>Penny Appeal responsibilities .....</b>	<b>7</b>
<b>Staff responsibilities .....</b>	<b>8</b>
<b>PILLAR 2: REPORTING .....</b>	<b>9</b>
<b>How to report a safeguarding concern or incident .....</b>	<b>9</b>
<b>Confidentiality.....</b>	<b>10</b>
<b>Concerns about staff members or associates .....</b>	<b>10</b>
<b>PILLAR 3: RESPONSE .....</b>	<b>11</b>
<b>PILLAR 4: LEARNING .....</b>	<b>11</b>
<b>ASSOCIATED POLICIES AND GUIDANCE .....</b>	<b>11</b>
<b>APPENDICES: ASSOCIATED PROCEDURES AND FORMS.....</b>	<b>12</b>
<b>Terminology and Acronyms .....</b>	<b>13</b>
<b>Statement of Commitment including Safeguarding Code of Conduct.....</b>	<b>17</b>
<b>Safeguarding Incident/Concern Reporting Form.....</b>	<b>20</b>
<b>Safeguarding Reporting Flowchart – UK.....</b>	<b>24</b>

## **PURPOSE**

At Penny Appeal, people are at the heart of everything we do. Inspired by the universal values of the Islamic faith, Penny Appeal's mission is to serve all those in need at home and abroad. Our vision is to transform small change into a big difference for those who need us most.

We are committed to creating a workplace where all staff and associates are treated with respect and dignity, and is characterised by honesty, integrity and mutual trust. Penny Appeal welcomes diversity and believes every staff and associate has the right to work in an environment which encourages harmonious relationships. Penny Appeal expects that our staff and associates shall behave responsibly and represent our values at all times, and maintain the highest professional, moral and ethical standards in their day-to-day work.

The purpose of this Policy is to protect people, particularly children, at-risk adults, and project participants and community members, from any harm that may be caused due to their coming into contact with Penny Appeal. This includes harm arising from:

1. The conduct of Penny Appeal staff or associates (including project visitors, volunteers, donors, consultants, contractors or partners, among others):
  - a. our staff or associates perpetrating actual or suspected acts of harm or sexual exploitation and abuse and sexual harassment (SEAH) against project participants or community members, including children and at-risk adults.
  - b. our staff or associates perpetrating actual or suspected acts of harm or SEAH against another staff member or representative.
2. The design and implementation of Penny Appeal's programmes or operations (including project, advocacy, media and communications, and fundraising activities, among others).

The Policy provides guidance and informs staff and associates of their responsibilities in relation to safeguarding. It sets out our commitments to ensure that Penny Appeal provides a safe environment for everyone we work with and for.

This policy does NOT cover:

- Sexual harassment and bullying in the workplace – this is dealt with under Penny Appeal's Anti Bullying and Harassment Policy
- Other forms of misconduct, those that do not involve neglect or are not of a physical, emotional or sexual nature – such as fraud, corruption, or abuse of alcohol and drugs during working hours. These forms of misconduct are adequately covered in the Code of Conduct, the Safeguarding Code of Conduct (see appendix 2) and other relevant policies.
- Safeguarding concerns in the wider community which cannot be considered to be caused by our staff, associates, programmes or operations. However, we still have the responsibility to report the incident or concern to the relevant authorities.

## WHAT IS SAFEGUARDING?

Safeguarding covers prevention, mitigation, and response actions to address the full range of personal abuse, violence, and harassment committed or allegedly committed by staff or associates or caused by an organisation's programmes or operations.<sup>1</sup>

At Penny Appeal, we understand safeguarding to mean protecting people, in particular children and at-risk adults, from maltreatment or harm caused by our staff, associates, programmes or operations.

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

## POLICY STATEMENT

Penny Appeal believes that everyone we come into contact with, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation, has the right to be protected from all forms of harm. We are committed to preventing any form of SEAH, including child abuse and adult at-risk abuse, and responding robustly when harm takes place. We are committed to adopting a comprehensive safeguarding practice and culture, with safeguarding of children and at-risk adults being the primary focus in all of our programmes, fundraising, events, communications and planning.

This policy enables us to prevent, report and respond to safeguarding concerns and ensure accountability and transparency at all times. Our Trustees are accountable to the UK Charity Commission for England and Wales for any harm caused by Penny Appeal staff, associates, programmes or operations and take all safeguarding matters extremely seriously.

We work with some of the most marginalised and at-risk children, adults, families, and communities, both within the UK and overseas. Often having less power, women and children are particularly vulnerable to SEAH, and this group of individuals is most at risk of discrimination due to one or more protected characteristics.<sup>2</sup> At Penny Appeal, we recognise that the natural process of our work can create an imbalance of power between our staff, associates, programmes or operations, and the lives of people we support. It is our moral and legal duty to ensure that this power is never abused in a way which causes or risks harm and that all persons who receive or deliver development programming or humanitarian assistance, do so in a way that is safe, respectful and nurturing.

Penny Appeal is committed to providing a safe and trusted environment for everyone who comes into contact with our work. We maintain a **Zero- tolerance** approach towards any form of abuse, exploitation, or neglect. Our zero-tolerance approach means we will always take action when safeguarding harm takes place. We ensure that support is offered to all those affected, and that the organisation learns from the harm, so it does not happen again. Our staff and representatives accept and recognise their responsibility to provide an environment that promotes the

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<sup>1</sup> Bond and Proteknon, 20 Core Elements: A Toolkit to Strengthen Safeguarding Report-Handling (2020), page 9

<sup>2</sup> In the UK, it is against the law to discriminate against someone because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation, as per the Equality Act 2010

safety of the people we work with and for at all times and demonstrate the highest standards of behaviour towards children and at-risk adults, in both their professional and personal lives.

This Safeguarding Policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from SEAH. This policy serves as an overarching framework. It is complemented by our Code of Conduct, which applies to all our staff and associates, and sets forth mandatory principles and requirements for behaviour. It is further complemented by the Safeguarding Code of Conduct, outlining our duty of care and responsibility to keep all children and at-risk adults who we come into direct or indirect contact with safe from harm, as well as guidance on safeguarding at-risk adults in the<sup>1</sup> UK. These key areas of safeguarding may have other different policies and guidelines associated with them (see Associated Policies).

## GUIDING PRINCIPLES

Our Safeguarding Policy and procedural framework ensure a robust, human rights-based and survivor-centered approach. This policy draws on human rights principles and standards, and international and regional conventions and protocols, in particular the UN Convention on the Rights of the Child, that sets out our responsibility to protect children from all forms of abuse, neglect, exploitation and violence, and the Keeping Children Safe Standards.

We adhere to the Inter-Agency Standing Committee (IASC) Minimum Operating Standards on protection from sexual exploitation and abuse (MoS-PSEA) and during a humanitarian response, we adhere to sector-wide humanitarian standards to support (child) safe programming, including the Core Humanitarian Standard (CHS) on Quality and Accountability, including the PSEA elements, as well as the Minimum Standards For Child Protection In Humanitarian Action (CPMS). We also endorse the United Nations Secretary General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse, providing specific standards on the prohibition of sexual exploitation and sexual abuse.<sup>3</sup>

The Policy sets out the minimum that needs to be in place to keep children and at-risk adults safe in our operations and our interactions with them. Penny Appeal is committed to keeping children and at-risk adults safe and we promote the fundamental principle of do no harm. We intend to lead by example and put the best interests of the child and the adult at-risk as the primary consideration in all of our programmes and operations.

In line with the Safeguarding against SEAH Due Diligence Guidance for The Foreign, Commonwealth & Development Office (FCDO) implementing partners 2022, and the six key SEAH safeguarding areas in particular, Penny Appeal is committed to applying the following principles in relation to safeguarding against SEAH:

- everyone has responsibility for safeguarding
- do no harm

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<sup>3</sup> The United Nations Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse of 9 October 2003 (ST/SGB/2003/13), contains definitions of sexual exploitation and abuse,

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<sup>1</sup> Care Act 2014.

classifying such acts as serious misconduct for all UN staff, including UN agencies, and stressing that these rules should also apply to entities and individuals working in cooperative arrangements with the UN.

- We have a safeguarding duty of care to project participants, community members and other stakeholders, staff and volunteers, as well as to children and adults-at-risk who may be directly or indirectly delivering or impacted by our programmes or operations and may be vulnerable to abuse
- act with integrity, be transparent and accountable
- all activity is in the best interests of the child or the person at risk.
- sexual relations with any person under the age of 18 is considered to be sexual abuse and is prohibited
- in line with the UN Convention on the Rights of the Child and the Children Act 1989 <sup>2</sup>(UK), a child is defined as any individual under the age of 18 regardless of the age of majority/consent in a given country
- all children and adults shall be treated equally, irrespective of sexual orientation, gender identity and expression and sex characteristics (SOGIESC); religion/or none; race; ethnicity; disability; or any other protected characteristic as listed in the 2010 Equality Act (UK)
- apply a safeguarding lens to our promotional communications and fundraising activities.

## SCOPE

This policy applies equally to all contracted Penny Appeal staff and everyone associated with Penny Appeal, including trustees, volunteers and interns, consultants and contractors, agency staff, ambassadors, visitors, donors, journalists and the media, celebrities and politicians, any other persons or organisations representing Penny Appeal in any capacity, as well as partners, vendors and other third parties, where it is included or referenced in relevant bid or tender documents, agreements, memorandums, purchase orders or contracts.

This policy also applies to all staff and associates at Penny Appeal Country Offices in Pakistan, Palestine and Yemen. The Safeguarding Department at Penny Appeal in the UK will work closely with relevant staff at these three offices to ensure that the Safeguarding Policy is adapted to the local context and ensure alignment with the national legislative and procedural framework and is translated into any appropriate local languages.

Penny Appeal will only partner with organisations that either have a robust safeguarding framework in place or are willing to adopt/adhere to this Safeguarding Policy. Penny Appeal's Safeguarding Department in the UK will collaborate and support in this process, in close cooperation with the Programmes teams.

The Board of Trustees has approved the Policy. Anyone found breaching this policy may face disciplinary action, up to and including the termination of contracts or other involvement in Penny Appeal's work. Staff and representatives breaching this policy also face potential referral to statutory agencies, unless to do so would put survivors at risk of further harm.

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<sup>2</sup> Working together to safeguard children (2018 updated 2023)

## APPROACH

Guided by international and national best practice with regard to protecting children and at-risk adults, Penny Appeal commits to addressing safeguarding throughout its work. Our Safeguarding Pillars: to prevent, to report, to respond and to learn, are used as a standardised approach to keeping children and at-risk adults safe in all our programmes and operations, and ensures that all staff and associates have access to, are familiar with, and know their responsibilities within related policies.



## PILLAR 1: PREVENTION

### Penny Appeal responsibilities

Penny Appeal will:

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

which information about individuals in our programmes is gathered and communicated, shared with third parties, stored and destroyed.

- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associates, in particular those who will come in direct contact with children and at-risk adults.
- Ensure all staff and associates receive regular training on safeguarding at a level commensurate with their role in the organisation.
- Ensure all partner organisations are assessed against safeguarding benchmarks.
- Follow up on reports of safeguarding concerns promptly and according to due process.

## Staff Responsibilities

**Child safeguarding** - child safeguarding is guided by the United Nations Convention on the Rights of the Child, the Child Protection Minimum Standards and the Keeping Children Safe Standards, amongst others. Please note that child safeguarding is also covered separately in our Safeguarding Code of Conduct.

Penny Appeal staff and associates will 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
- Subject a child to grooming with the intention of exploitation, radicalisation or sexual activity
- Engage in any commercially exploitative activities with children, including but not limited to child labour and child trafficking.

## Adult safeguarding

Penny Appeal staff and associates will NOT:

- Sexually abuse or exploit at-risk adults
- Subject an at-risk adult to physical, emotional or psychological abuse or neglect.

## Protection from sexual exploitation, abuse and sexual harassment (SEAH)

Penny Appeal staff and associates will NOT:

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

Penny Appeal staff and associates are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy and related guidance and procedures.
- Report any concerns or suspicions regarding safeguarding violations by Penny Appeal staff or associates.

## PILLAR 2: REPORTING

Penny Appeal will:

- Ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff, associates, and the communities we work alongside.
- Ensure that all our offices have at least one designated Safeguarding Focal Person, who is properly trained on safeguarding and case management, and whom staff, associates as well as project participants and community members can approach or contact when needed. The Safeguarding Focal Person will be in regular contact with the Director of Safeguarding and will be the point of contact for reporting any safeguarding concerns or incidents to the Safeguarding Department in the UK.
- Ensure that all staff and associates are aware and understand that they have a duty to report any known or suspected safeguarding concern or incident, using the Safeguarding Concern or Incident Reporting Form available on SharePoint to be submitted to: [safeguarding@pennyappeal.org](mailto:safeguarding@pennyappeal.org).
- Ensure that staff and associates are aware and understand that any failure to report will constitute a breach of this policy, which may result in disciplinary action.
- Ensure that any staff member or associate reporting concerns through formal whistleblowing channels (or if they request it) will be protected by Penny Appeal's Whistleblowing Policy (Disclosure of Malpractice in the Workplace).
- Also accept reports from external sources such as members of the public, partners and official bodies.

### How to report a safeguarding concern or incident

Staff and associates who have a concern relating to safeguarding should report it immediately, but in any case, within 24 hours, to their Safeguarding Focal Point, Designated Safeguarding Lead, or line manager. If the staff member or associate does not feel comfortable reporting to their Safeguarding Focal Point, Designated Safeguarding Lead, 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 a member of the HR Team. It is the responsibility of all Penny Appeal staff and associates to report any concern or incident without delay.

### INTERNAL REPORTING

If a staff member or an associate is concerned about an issue of safeguarding and does not wish to speak to the Safeguarding Focal Point, line manager, senior manager or HR please contact:

The Designated Safeguarding Lead via:

e-mail: [safeguarding@pennyappeal.org](mailto:safeguarding@pennyappeal.org) or mobile phone: +44 (0)7443379997.

The Director of Safeguarding will manage all concerns in accordance with this policy and other associated guidance and procedures with the involvement of the Safeguarding Officer. The reporting flowchart for the UK can be found in the Appendices.

#### **EXTERNAL REPORTING (IN THE UK)**

If a staff member or an associate is concerned about an issue of safeguarding and do not wish to speak to the Safeguarding Focal Point, line manager, the Director of Safeguarding, or a member of the Executive Committee, they can report to:

#### **The Charity Commission for England and Wales**

E-mail: [whistleblowing@charitycommission.gov.uk](mailto:whistleblowing@charitycommission.gov.uk)

#### **FCDO**

Reporting Concerns Inbox: [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk)

confidential reporting hot line: +44 (0)1355 843 747

Staff and associates can also get advice from:

#### **NSPCC, the UK's children charity (concerns about a child):**

E-mail: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Voice Helpline: 0808 800 5000

#### **Protect (specialist whistleblowing charity)**

Free and confidential advice line: 020 3117 2520

**If you think a child or at-risk adult is suffering or in immediate danger, please call the police in your respective country – call 999 in the UK.**

#### **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.

#### **Concerns about staff members or associates**

Concerns about the behaviour of responsible adults within the organisation will be reported to the Designated Safeguarding Lead for the UK office, without delay, but in any case, within 24 hours. The Designated Safeguarding Lead might contact social care services, or the police, if a crime may have been committed.

In case the Designated Safeguarding Lead is implicated, the concern or incident should be reported to the Director of UK Programmes, who is the Deputy Designated Safeguarding Lead in the UK office.

In case the Director of UK Programmes, who is the Deputy Designated Safeguarding Lead, is the subject of allegations regarding conduct, the concern or incident should be reported to the Chair of the Trustees, who is the lead trustee for safeguarding.

### **PILLAR 3: RESPONSE**

Penny Appeal will:

- Follow up all safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Safeguarding Reporting Flowchart in Associated Policies).
- Apply appropriate disciplinary measures to staff and associates found in breach of policy.
- Offer support to survivors of harm caused by staff or associates, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be survivor-centred.

### **PILLAR 4: LEARNING**

Penny Appeal will:

- Provide transparency and clarity for report handling of safeguarding concerns and incidents.
- Ensure that all safeguarding cases are appropriately managed and referred, with concerns and feedback logged and documented in secure register with learning documented and implementation tracked (case management).
- Ensure that reporting to authorities is in the survivors' best interests and does not create any further risk or harm (risk assessment).
- Report quarterly on safeguarding to Penny Appeal Board of Trustees.
- Promote cross-departmental learning on safeguarding, and ensure learning is shared among staff, across departments and with partners.

### **ASSOCIATED POLICIES AND GUIDANCE**

Code of Conduct

Safeguarding Code of Conduct (please refer to Appendices)

Guidelines on Safeguarding at-risk Adults in the UK (pending)

Whistleblowing Policy

Privacy Policy

Data Protection Policy

Recruitment and Selection Policy

Safer Recruitment Policy (pending)

Dignity at Work Policy (pending)

Grievance Policy

Complaints Procedure

Content Policy (pending)

Brand Guidelines (pending)

#### **APPENDICES: ASSOCIATED PROCEDURES AND FORMS**

1. Terminology and acronyms
2. Statement of Commitment including Safeguarding Code of Conduct
3. Safeguarding Incident / Concern Reporting Form
4. Safeguarding Reporting Process flowchart

## TERMINOLOGY AND ACRONYMS

Whilst reporting procedures and service thresholds may differ across jurisdictions, we have chosen to use both international and UK definitions for children and at-risk adults to guide consistency of understanding and practice, because of the global scope of this policy and the UK base of Penny Appeal.

**Abuse:** Abuse is defined as any action that intentionally harms or injures another person. In many cases, it is characterised by unbalanced power relationships between stakeholders (the abuser and the survivor).

**Associate** refers to a range of contracted paid and non-paid individuals who have committed to work with or support Penny Appeal. This includes trustees, volunteers and interns, consultants and contractors, agency staff, ambassadors, visitors, donors, journalists and the media, celebrities and politicians, any other persons or organisations representing Penny Appeal in any capacity, as well as partners, vendors and other third parties, where it is included or referenced in relevant bid or tender documents, agreements, memorandums, purchase orders or contracts.

**At-risk adult:** an adult who has care and support needs, is experiencing or is at risk of abuse, or neglect, and is unable to protect themselves (as defined by the care Act 2024).

**Child:** Every human being is below the age of 18. This policy applies equally to all children regardless of their background, age, class, gender, ethnicity, religion, ability or sexual orientation or country of residence / origin.

**Child Protection:** Programmes that Penny Appeal implements directly or through partners to prevent and respond to abuse, neglect, exploitation and violence affecting children.

**Child in Need:** A child who is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services by a local authority (Children Act 1989, s17 & s47- where a child is at risk of significant harm).

**Concerns** are a “cause of anxiety or worry.”<sup>4</sup> They are suspicions and/or rumours held by an individual that a staff member, associate, or the organisation’s operations or programmes have or are causing harm or maltreatment. These are currently not proven by evidence to be true.

**Harm or maltreatment** caused by an organisation’s staff, operations, or programmes is personal abuse, exploitation, violence, harassment, or neglect against members of the affected community – including children and/or adults – or in the workplace against another staff member or associate. This is a plain English alternative term to describe a safeguarding concern or incident. Harm is:

- Injury, pain, suffering, or trauma of a physical or emotional nature
- Intentional or unintentional.

This includes but is not limited to:

- **Psychological harm:** Emotional or psychological abuse, including (but not limited to) harassment and/or bullying, humiliating and degrading treatment such as bad name-calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

- **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 violence:** any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic, or otherwise directed, against a person’s sexuality using coercion, by any person regardless of their relationship to the victim, in any setting, including but not limited to home and work.<sup>5</sup>
- **Sexual exploitation:** 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.
- **Negligence:** Failure to act with due care and responsibility for the safety and well-being of others, as explained in this policy. This includes, but is not limited to, failing to act on and reduce risks, or failure to raise a concern through proper channels in a timely and confidential manner.

**Exploitation** shall include, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.<sup>6</sup>

**Harassment** is defined as unwelcome behaviour of offensive nature severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. This includes discrimination based on gender, race, religion, sex (including pregnancy), ethnicity, age, disability or genetic information. It includes bullying, stalking, sexual harassment, personal harassment, and harassment based on any characteristics listed above. Harassment normally implies a series of incidents.

**Incidents:** Harm or maltreatment caused by an organisation’s staff, operations, and programmes.

**Project participant:** Often referred to as “beneficiary”. Someone who directly receives goods or services from Penny Appeal’s programme or project. Note that misuse of power can also apply to the wider community that the organisation works alongside and can include exploitation by giving the perception of being in a position of power.

**PSEAH** means Protection from Sexual Exploitation, Abuse and Sexual Harassment.

**Report** is a catchall term covering:

- All general programme feedback
- Complaints
- Concerns or suspicions of maltreatment or harm.
- Allegations of safeguarding incidents, once these have been received by an organisation from either an internal or external source and the organisation has started to process the report through their report-handling mechanism (this includes allegations of non-recent abuse disclosure either in respect of Penny Appeal or any abuse associated with staff or associates currently working for Penny Appeal from past activity)

The term complaint is used by many organisations to refer to reports of concerns or incidents involving maltreatment or harm of all kinds. In general, use of the word “complaint” infers a negative opinion or expression of discontent. Given concerns or incidents raised may be criminal acts and/or human rights violations, it is felt inappropriate to use the term “complaint.”

<sup>5</sup> As defined by the World Health Organization, available at: [https://www.who.int/violence\\_injury\\_prevention/violence/global\\_campaign/en/chap6.pdf](https://www.who.int/violence_injury_prevention/violence/global_campaign/en/chap6.pdf)

<sup>6</sup> Adopted from article 3, paragraph (a) of the Protocol to Prevent, Suppress and Punish Trafficking In Persons, especially Women and Children, supplementing the United Nations Convention Against Transnational Organized Crime (Palermo Protocol)

**Reporter** is the person who shares details of a concern or incident with the organisation, irrespective of their role in the incident(s), or their relationship to the survivor or potential wrongdoer.

**Safeguarding** covers prevention, mitigation, and response actions to address the full range of personal abuse, violence, and harassment committed or allegedly committed by staff or associates, or caused by an organisation's operations or programmes.

At Penny Appeal, we understand safeguarding to mean protecting people, in particular children and at-risk adults, from maltreatment or harm caused by our staff, associates, programmes or operations.

**Safeguarding report-handling mechanisms** are a set of organisation-specific policies, processes, and procedures that describe:

- How to receive information about concerns or incidents relating to physical, emotional or sexual harm or maltreatment by staff.
- How to support survivors, and their children or other family members, friends, witnesses, and the (potential) wrongdoer to address their safety, security, medical, psychosocial, and legal needs.
- How to respond to the report to confirm or dismiss allegations – including fact-finding, formal enquiry, and disciplinary action.
- When to document certain details of a concern or incident.
- Staff roles and responsibilities in relation to handling concerns, incidents, and reports.
- The timeframe for action for each step.
- How, when and to whom feedback should be given.

**Sexual Harassment:** Any unwelcome sexual advance, request for sexual favour, verbal, emotional or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Sexual harassment can take the form of ridicule, sexually provocative remarks or jokes, offensive comments about dress or appearance, the display or distribution of sexually explicit material, unwelcome sexual advances or physical contact, demands for sexual favours and assault.

### **Survivor**

Survivor is a person who has experienced maltreatment or harm committed by a staff member or associate or as caused by an organisation's operations or programmes. The survivor may be a staff member or a member of the community – child or adult.

While the term victim and survivor are used interchangeably, survivor is the preferred term for it signifies resiliency.

**Survivor-centered approach** means that the survivor's rights, needs and wishes are prioritised, putting the safety, wishes and interest of the survivor first, above all other considerations. Taking a survivor-centred approach requires that staff at Penny Appeal talks to and listens to the survivor in ways adapted to each and every single survivor.

**Trafficking in Persons** is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

**Visitors:** Refers to a range of persons who are visiting our offices or projects and may come into contact with children and at-risk adults through our offices or partners in-country.

**Wrongdoer (potential wrongdoer):** "Potential is the 'possibility of something happening or of someone doing something in the future.'<sup>7</sup> A wrongdoer is a person who does things that are immoral or illegal."<sup>8</sup> Many organisations use the term "alleged perpetrator" throughout the handling of a report. The term alleged perpetrator refers to someone who is legally accused of committing a crime. Here, the term alleged perpetrator is used only once an enquiry has confirmed that a crime was committed or when legal authorities are handling a case.

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<sup>7</sup> Lexico from Oxford University Press, 2019, available at: <https://www.lexico.com/en/definition/concern>

<sup>8</sup> Collins English Dictionary – Complete and Unabridged, HarperCollins Publishers, 12th Edition, 2014, available at: <https://www.collinsdictionary.com/dictionary/english/wrongdoer>



## DECLARATION FORM

**STATEMENT OF COMMITMENT** to Penny Appeal's Safeguarding Policy, Safeguarding Code of Conduct and related procedures applicable to Penny Appeal contracted members of staff (permanent or temporary) and associates.<sup>9</sup>

I have read and understood my responsibilities outlined in the Safeguarding Policy, the Code of Conduct, the Safeguarding Code of Conduct (below) and related procedures. I agree with the terms contained therein and accept the importance of complying with the provisions while working with or representing Penny Appeal in any way.

I understand that the consequences for non-compliance could have serious repercussions. If any of my personal circumstances change that might affect my ability to undertake my duties and create a possible risk to children or at-risk adults, I undertake to inform Penny Appeal's Director of Safeguarding immediately and seek their guidance ([safeguarding@pennyappeal.org](mailto:safeguarding@pennyappeal.org)).

In addition, I agree to the following guidelines regarding appropriate and inappropriate behaviour of adults towards children and at-risk adults and of children towards other children.

### SAFEGUARDING CODE OF CONDUCT

#### APPROPRIATE BEHAVIOUR:

- Treat all children and at-risk adults with respect and never discriminate against or favour them because of their age, gender, status, class, caste, nationality, ethnic or social origin, faith, visual appearance, language ability, physical or mental disability, sexual orientation, or any factor that distinguishes them from others.
- Adhere to the Safeguarding Policy and procedures at all times.
- Report any incidents or concerns that a child or at-risk adult is, or is likely to be, at risk of harm.
- Inform line managers and HR Manager of any changes in circumstances since one's first involvement with Penny Appeal, which may impact on the ability to comply with our Safeguarding

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<sup>9</sup> Associates: The Board of Trustees, volunteers and interns, consultants and contractors, agency staff, Penny Appeal Ambassadors, project visitors, including our donors, journalists and the media, contractors, celebrities and politicians, any other persons or organisations representing Penny Appeal, however briefly, partners, vendors and other third parties, where it is included or referenced in relevant bid or tender documents, agreements, memorandums, purchase orders or contracts. This also applies to all contracted staff and associates at Penny Appeal Country Offices in Pakistan, Palestine and Yemen.

Policy and the Code of Conduct, such as an investigation by another agency into (child) safeguarding allegations in one's own family.

- Work in partnership with colleagues and other agencies to promote and safeguard the welfare of children and at-risk adults in everything that we do.
- Develop and keep clear personal boundaries and rules when conducting activities that involve children or at-risk adults to keep yourself and them safe. E.g. In general, only hold a child's hand when they initiate it.
- Ensure that all staff and associates have received the appropriate supervision and support to ensure children and at-risk adults are safe at all times.
- Ensure that confidential information concerning children, at-risk adults, families and communities is not shared inappropriately on social media, or with others, except through formal Penny Appeal reporting processes with full informed consent.
- Undertake a risk assessment prior to carrying out any project involving children and / or at-risk adults.
- Be aware that all children and at-risk adults that we work with may have witnessed or suffered traumatic events and therefore ensure that any activity undertaken considers their physical, emotional, and cognitive state. This also includes ensuring games, interviews, or any other activities are age appropriate.
- Be aware of and recognise the power balance between an adult and a child, and behave in an appropriate, child friendly, accountable, and transparent way at all times.
- Provide a safe and conducive environment for activities.
- Wear appropriate photo identification at all times when having direct contact with children and at-risk adults.

#### **INAPPROPRIATE BEHAVIOUR:**

- Any kind of discrimination including racism, homophobia, sexism, and/or religious discrimination.
- Showing preferential treatment of some children or at-risk adults to the detriment or exclusion of others.
- Shouting at or bullying children or at-risk adults, which includes using language or offering advice, which is offensive, abusive, or threatening in any way.
- Intentionally physically or verbally intimidating children or at-risk adults and/or preventing a child or at-risk adult from expressing his/her opinion.
- Using any sort of physical chastisement or punishment.
- Beating or hitting a child or at-risk adult, or withholding food, water, or other necessities of care, even as a form of discipline, is not permitted.
- Physically restraining children or at-risk adults during programme activities or at any other time unless the staff member has had appropriate training and another responsible adult is present as a witness.
- Assisting children with tasks of a personal nature which are not part of their job description and/or which the child is capable of fulfilling themselves.
- Allowing a child or at-risk adult with whom you work to stay overnight in your house and/or to sleep in the same bed.
- Spending time alone/unsupervised with a child or at-risk adult with whom you work. Wherever possible and practical, two adults should be present during workshops and other children's

activities. Where this is not possible, staff should seek alternatives such as the presence of adult community members and/or use of open spaces that are visible to others in the area.

- Engaging in, or attempting to engage in physical, sexual, or inappropriate relationships with children or at-risk adults for whatever reason, including the use of suggestive conversations, comments, texting, instant messaging, emails, or via social media sites.
- Developing relationships of an inappropriate nature with children, which could in any way be deemed abusive or exploitative.
- Displaying general behaviour which is against good practice or is potentially abusive, including behaviour by means of ICT, like mobile phone or internet. This includes providing personal email addresses or phone numbers to children or at-risk adults participating in our programmes or projects.
- Carrying out duties, visit or volunteer with children and at-risk adults whilst under the influence of alcohol, solvents, or drugs.
- Encourage or assist others including children to break the law in any way.
- Engage or pay a child or at-risk adult for any service that is not part of an activity that has been organised and agreed upon by Penny Appeal.
- Neglect a child or leave a child unsupervised as it may put the child at risk of harm or injury.
- Marry or carry out traditional practices involving a child that could be harmful to the child; or engage a child in exploitative labour, even if it is culturally acceptable.

All signatories have a duty to report suspected or confirmed breaches of the Safeguarding Policy and the Safeguarding Code of Conduct above to the Safeguarding Focal Point in-country or the Director of Safeguarding ([safeguarding@pennyappeal.org](mailto:safeguarding@pennyappeal.org)). Reports must be made within 24 hours of becoming aware of the breach.

<b>Name:</b>
<b>Job title / role / position:</b>
<b>Organisation or affiliation:</b>
<b>Address:</b>
<b>Signature:</b>
<b>Date:</b>



## SAFEGUARDING INCIDENT / CONCERN REPORTING FORM

### \*CONFIDENTIAL\*

- When dealing with any safeguarding incident or concern, always treat the case with the utmost confidentiality.
- This form must be submitted to the Safeguarding Department ([safeguarding@pennyappeal.org](mailto:safeguarding@pennyappeal.org)) **within 24 hours** of becoming aware of a safeguarding incident or suspicion of a concern.
- You will receive an acknowledgement of receipt from the Director of Safeguarding (Designated Safeguarding Lead) or the Safeguarding Officer.
- This reporting form is complemented by the **Safeguarding Incident / Concern Follow up Form**, to be completed by the Safeguarding Focal Point.

Section 1: General information about location	
Country:	
Location of office:	Name of project / programme:
Section 2: Details of complainant	
Name:	Date of Birth:
Gender:	Language spoken:
Contact / address:	Any disability:
Name parents/caregivers (if the complainant is a child):	Contact address:

	Phone number:
<b>Section 3: Information about the types of abuse / harm – please circle as appropriate</b>	
<ol style="list-style-type: none"> <li>1. Physical abuse</li> <li>2. Sexual abuse</li> <li>3. Emotional abuse / (cyber and text) bullying / harassment / discrimination</li> <li>4. Neglect</li> <li>5. Exploitation / trafficking in persons (for commercial sexual exploitation, grooming, forced / child labour, modern slavery, organ harvesting, financial exploitation)</li> <li>6. Traditional harmful practices: child marriage, Female Genital Mutilation (FGM), witchcraft</li> <li>7. Radicalisation / organised crime</li> <li>8. Abuse of power</li> <li>9. Fraud / corruption / theft</li> <li>10. Other forms of harm / (domestic) violence</li> </ol>	
<b>Section 4: Details of the incident / concern</b>	
Date of the incident / concern:	
<b>Details of concern/abuse: what, who, where, when (include complainant's own words if possible)</b>	
<p><i>Describe sequence of events in chronological order, if possible</i></p> <p><i>Capture if the complainant witnessed, suspects or experienced abuse</i></p>	
<b>Other relevant information (including immediate actions taken to ensure safety of the complainant)</b>	
<b>Who else knows?</b>	
<p><i>Capture and record contact information of any witnesses, family members and other individuals, including those you consulted</i></p>	
<b>Has any information been shared with others?</b>	

*E.g. report to police, social welfare, (emergency) medical attention*

**Is any urgent action required to support the complainant?**

*Include immediate actions and steps forward*

**Section 5: Information about the Subject of Concern / alleged abuser (if known, and if relevant)**

Name:	Address:
Age:	Employment details:
Position:	Relationship, if any, to the complainant:
Current location of alleged perpetrator:	

**Section 6: Details of person submitting this report**

Name:	Position and organisation:	
Address:	Relationship to the complainant:	
E-mail:	Phone:	
Time:	Date:	Place:

**Report received by Safeguarding Department**

Date and time:	Mode:
	E-mail      Phone      In person

**Timeline for anticipated acknowledgment / response:**

- Within 24 hours after you have submitted this report to [safeguarding@pennyappeal.org](mailto:safeguarding@pennyappeal.org) , you will receive an acknowledgement e-mail. This is to recognise receipt of your submission and will inform you that discussions will take place at Penny Appeal Headquarters regarding this case.
- Within 48 hours of your submitting this report, the Director of Safeguarding (Designated Safeguarding Lead) or the Safeguarding Officer will contact you with more considerable and instructive feedback.
- Hereafter, please destroy and / or delete the information and any communication trail that you may have, in compliance with our Data Protection Policy and Privacy Policy.

# SAFEGUARDING INCIDENT REPORTING FLOWCHART

Have you **SEEN, HEARD** or do you **SUSPECT** a case where staff or associates (including partners and volunteers) have put a child or at-risk adult in danger or potential abuse?

## YOU HAVE A DUTY TO REPORT!

It is essential to avoid delay as this may put the child or at-risk adult at further risk.

- 1 Ensure the child or at-risk adult is safe and receives treatment / support as necessary
- 2 Concerns should be reported immediately and certainly within 24 hours.
- 3 Do not decide on your own if the incident deserves investigation, just report the incident
- 4 Do not talk about it to others - the accusation could put staff, associates, **the child or at-risk adult at further risk of harm**.

Is the child or at-risk adult suffering or in immediate danger?

