



**TRANSPARENCY INTERNATIONAL.**  
**SIERRA LEONE**

# **STAFF SAFE GUARDING POLICY**

**2019**

## **1. INTRODUCTION**

### **1.1 SAFEGUARDING**

Safeguarding within an organisation is the responsibility of all in the organisation to ensure as far as is reasonably practicable that its staff, volunteers, operations and programmes do no harm to children, women, young people or vulnerable groups be it young or adults. It is the organisation's responsibility to ensure that it does not expose children, women, young people or vulnerable adults to the risk of discrimination, neglect, injury and or abuse (hereafter referred to as harm), and that any concerns the organisation has about the safety of children, young people and vulnerable adults are addressed and reported to the appropriate authorities for action. The organisation also has a responsibility to protect its staff and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse at all times.

### **1.2 PURPOSE**

This policy is designed to outline Transparency International Sierra Leone's (TI-SL) commitment to prevent harm, and to promote the health and wellbeing of children, young people and vulnerable adults. This policy is designed to inform, guide and direct staff and volunteers in the use of TI-SL safeguarding framework. It details the framework through which TI-SL can establish a culture of safeguarding at all times and levels throughout the organisation.

### **1.3 SCOPE**

This policy is mandatory for all TI-SL staff, volunteers in Sierra Leone. It is for all the aforementioned to understand and abide by the guidelines outlined in this document, and by all policies and documents to which it is directly or indirectly linked, such as the HR policy, code of conduct

### **1.4 ACCOUNTABILITY**

Transparency International Sierra Leone Advisory Board take ultimate responsibility for the welfare and protection of children, women, young people and vulnerable adults within the context of TI-SL work. It is however recognised that despite varying levels of accountability, safeguarding is everyone's responsibility.

### **1.5 COMPLIANCE**

Compliance with the policy is not optional, it is compulsory for TI-SL staff and members and concurrent with the start of any kind of relationship with Transparency International Sierra Leone. Actions of the membership found to be in-breach of the policy will be subject to disciplinary procedures and potential legal action. TI-SL believes that safeguarding children, young people and vulnerable adults is the responsibility of all Advisory Board and staff members, and will ensure everyone understands their own responsibilities including their mandatory obligation to report a concern, allegation or disclosure, and is aware of the mechanisms in place to do so.

## 1.6 DISTRIBUTION

Key to the successful implementation of this policy is ensuring thorough and comprehensive distribution. To this effect:

- TI-SL will widely promote and disseminate the policy, making both hard and electronic copies available and accessible to all relevant stakeholders.
- The Executive Director will be responsible for making available adequate copies of the policy for full accessibility and understanding by all relevant parties.
- Distribute the policy to partner organisations so that the policy commitments, principles and practices are publicised and partner organisations are clear about TI-SL position on safeguarding

## 2. POLICY STATEMENT

- TI-SL considers the welfare and protection of children, young people and vulnerable adults to be an organisational imperative with primacy over the success of programmes or strategic objectives.

TI-SL has a zero tolerance approach to the harm of children, young people and vulnerable adults.

- TI-SL recognizes that safeguarding is everyone's responsibility and that it has a responsibility to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of the children, young people and vulnerable adults with whom we work, and to protect the communities in which TI-SL operates from harm caused by its programmes, staff and membership

TI-SL believes that everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

- TI-SL is committed to responding promptly, appropriately and constructively to all information presented from children and young people, and pledges to always believe and act on any disclosures made.
- TI-SL values the contribution of children, young people and vulnerable adults and considers them to be key partners in developing and improving safeguarding procedures and services.

## 3. PRINCIPLES

TI-SL commits itself to the following principles identified in the [Care Act \(2014\) statutory guidance](#) in its approach to safeguarding children, young people and vulnerable adults. These principles should be upheld by all those to whom this policy addresses.

**3.1 EMPOWERMENT:** The importance of beginning with the assumption that each individual is best-placed to judge that individual's wellbeing.

**3.2 PROTECTION:** Support and representation for those in greatest need.

**3.3 PREVENTION:** Prevention of harm is a primary objective.

**3.4 PROPORTIONALITY:** A proportional and least intrusive response appropriate to risk.

**3.5 PARTNERSHIP:** Local solutions through services working in communities.

**3.6 ACCOUNTABILITY:** Accountability and transparency in delivering safeguarding

**3.7 PARTICIPATION:** Participation and inclusion of stakeholders in delivering safeguarding

#### **4.0 UNITED NATION CONVENTION ON THE RIGHTS OF THE CHILD (UNCRC)**

- a) It is recognised that how vulnerable groups and behaviours are distinguished within TI-SL areas of operation is subject to cultural interpretation and that sensitivities and even taboos may exist as to how these groups and behaviours are recognised, supported or marginalised.
- b) As a local organisation, TI-SL endorses the general principle of the United Nations Convention on the Rights of the Child (UNCRC) and Child Right Act, 2004, that all the rights guaranteed by these documents must be available to all children without discrimination; and article 19 which accords equal rights of protection for children from abuse.
- c) All of TI-SL staff have signed and ratified the UNCRC in compliance to the safeguarding policy.
- d) Cultural discrepancies are not considered an appropriate reason for TI-SL membership to breach, contradict or dispute the rights guaranteed by the UNCRC.

*(See appendix 4 – United Nations Convention on the Rights of the Child)*

#### **5.0 LEGAL COMPLIANCE**

- a) Budget Advocacy Network is committed to exercising compliance as far as is reasonably practicable with all safeguarding legislation relevant to its programmes and areas of operation.
- b) It is recognised that local legislation in this area exist in Sierra Leone, however this policy identifies minimum standards that may exceed the requirements of local legislation, and these standards must be upheld where they do not cause conflict with local law.
- c) Every staff member and partner of TI-SL is required to complete a safeguarding mapping exercise to gain an understanding of the local safeguarding context. This will include identifying relevant local legislation and agencies or services available for referrals or sign-posting.

*(See appendix 5 – Legal framework)*

*(See appendix 7 - Local safeguarding mapping template)*

#### **6.0 DUTIES**

All members will receive training in order to fulfil the following duties:

##### **RECOGNISE:**

To be able to recognise the possible signs that could indicate that harm is occurring to a child, young person or vulnerable adult. To be able to recognise when best practice as identified in this policy is not being observed.

##### **RESPOND:**

To respond appropriately and proportionally in-light of a disclosure, incident, allegation or concern.

The following can be used as guidance on how to respond when receiving a disclosure:

#### **WHAT TO DO WHEN RECEIVING A DISCLOSURE**

- I. Listen

- II. Empathise with the person
- III. Ask who, when, where and what, but NOT why
- IV. Repeat / check your understanding of the situation
- V. Report appropriately

#### **WHAT NOT TO DO WHEN RECEIVING A DISCLOSURE**

- I. Become defensive
- II. Argue with the person
- III. Be dismissive
- IV. Blame others
- V. Make assumptions without knowing the facts
- VI. Make promises you can't keep
- VII. Ignore the problem
- VIII. Try to investigate yourself

#### **RECORD**

To record factually and accurately, without speculation, opinion or assumption the details of a concern or disclosure. In the case of a disclosure, a record must be made using, as much as is reasonably practicable the words used by the person when disclosing.

#### **REPORT**

To report promptly to the most relevant and accessible point of contact. In the first instance this is the Chairman of the Advisory Board serving as lead Safeguarding Officer, then followed by the Executive Director as Deputy Safeguarding Officer, programme officer serving as Proxy Safeguarding Officer, or member of staff you feel most comfortable and able to report to.

### **6.1 PROHIBITED BEHAVIOURS**

To ensure that the risk of harm to children, young people and vulnerable adults is kept as low as is reasonably practical, TI-SL strictly prohibits the following behaviours. The prohibitions listed are not exhaustive and are underpinned by the safeguarding code of conduct, which all staff and volunteers are required to sign and uphold.

1. Sexual activity with anyone under the age of 18.
2. Sexually abuse or exploit children, young people or vulnerable adults.
3. Hit or physically assault a child, young person or vulnerable adult.
4. Put a child, young person or vulnerable adult at risk of harm.
5. Sexual activity with a community member.
6. For staff to have a sexual relationship with a volunteer.
7. Use a position of power to take unfair advantage of a fellow staff member, community member, partner or volunteer
8. Keep away project/activity budget information from a child, young person or vulnerable adult.

### **6.2 LEAD SAFEGUARDING OFFICER (+ DEPUTY)**

- TI-SL is committed to ensuring organisational safeguarding responsibilities are comprehensively fulfilled.
- Integral to the successful implementation of robust safeguarding practice is the identification and training of a Lead Safeguarding Officer (and deputy) as a vital internal resources to support the

delivery of effective safeguarding management. The requirements and responsibilities outlined in the Lead Safeguarding Officer Terms of Reference are designed to be compliant with widely accepted standards.

*(See appendix 2 – Code of conduct)*

## **7.0 INTERNAL REPORTING**

- It is the responsibility of all members to take seriously any safeguarding concerns, allegations, incidents or disclosures, and they are duty bound to report any incidents in compliance with the internal reporting guidelines outlined in this policy. It is essential that timely and effective action is taken, and therefore ensuring that the welfare of those affected is the paramount consideration.
- Any safeguarding concerns, incidents, allegations or disclosures must be reported promptly and documented in writing (using the cause for concern form and other approved ways) to the most relevant and accessible point of contact. In the first instance this is the Safeguarding Officer in-country, normally the chairman executive committee; secondly a senior member of staff the reporter feels most comfortable and able to report to. In certain circumstances, for example if a staff member is implicated in a disclosure, the whistle-blowing email may be used to report a safeguarding concern, incident, allegation or disclosure (bansecretariat@gmail.com).
- If needed or desired and prior to submitting a written report, the reporter can access support, guidance and advice regarding the issue through the Safeguarding officers.
- Forms should be password protected and circulated on a strict need to know basis. Written reports should aim to be submitted within 72 hours of the incident occurring.
- It is never an individual's responsibility to investigate a safeguarding case. No leading questions should be asked, and all written reports should be as factual and as objective as possible, and written to the fullest extent possible without speculation, assumption or opinion.
- Once the report has been submitted, the reporter's responsibilities have been effectively fulfilled (unless that individual is later needed as part of an investigative process.)
- Case discussions coordinated and chaired by the Safeguarding Officer in-country and involving only relevant and necessary staff will take place as soon as possible following the receipt of a report, and should aim to occur within 72 hours. Decisions and actions will be taken on the basis of the case assessment, and appropriate steps, sign-posting or referrals will be made. This decision will be informed by the training received by the Safeguarding officer, and take into account the various considerations outlined in this document. These include but are not limited to; the safeguarding principles, confidentiality, local considerations, the scope of the policy and the principle of do no harm.

Examples of possible outcomes of a case discussion could include:

- I. No further action needed
- II. Internal investigation
- III. External investigation
- IV. Staff suspension
- V. Programme suspension
- VI. External referral
- VII. External sign-posting

- VIII. Notification of authorities
- IX. Contacting emergency services

*(See appendix 1 – Cause for concern form)*

## **8.0 ROLES AND RESPONSIBILITIES**

Transparency International Sierra Leone will ensure that all staff and members are trained and conversant in their safeguarding responsibilities.

### **8.1 TRUSTEES:**

TI-SL recognises that in-line with Charity Commission guidelines that trustees are responsible for ensuring that those benefiting from, or working with the charity, are not harmed in any way through contact with it. They have a legal duty to act prudently and this means they must take all reasonable steps within their power to ensure that this does not happen. It is particularly important where the charity comes into contact with children, young people and vulnerable adults at a community level. Responsibilities are designed so that all reasonable steps to prevent harm have been taken, and include but are not limited to:

- To have primary responsibility for safeguarding in the organisation.
- To act in the best interests of children, young people and vulnerable adults.
- Ensure safeguarding policies and procedures are in place.
- To monitor and review safeguards policies and procedures.
- To respond appropriately to allegations of abuse.
- Designated board level lead to take leadership responsibility for the organisation's safeguarding arrangements.
- People committee: In recognition of this commitment to participation, safeguarding is a standing agenda item on the People Committee Quarterly meeting. This comprises of key leadership from the People and Performance team meeting with a group of HR focused trustees and affiliates, chaired by a trustee. This provides a dedicated and high level space to address safeguarding, and from which issues can be elevated to the entire board.

### **8.2 LEAD SAFEGUARDING OFFICER (+ DEPUTY AND PROXY):**

- The first point of contact for all staff and volunteers to go to for advice regarding safeguarding and child protection.
- Senior member of staff to take lead responsibility for safeguarding and child protection within the organisation.
  - To refer all cases of suspected abuse to the local authority.
- Responsible for ensuring that their organisation's safeguarding policy is kept up to date, complete and reflects up to date legislation.
- To test and review procedures.
- That a staff structure is in place to fulfil safeguarding responsibilities.
- That safeguarding is afforded the utmost priority at the most senior levels within the organisation,
  - including the Senior Management Team and the Advisory Board.
- To ensure procedures are in place for: managing safeguarding allegations against staff and volunteers, and safe recruitment practices.
- That secure records concerning safeguarding are kept and shared appropriately.
- To advocate for resources to fulfil organisational safeguarding responsibilities.

*(See appendix 3 – Lead safeguarding Officer TOR)*

### **8.3 TIER 1: (SENIOR MANAGEMENT TEAM, EXECUTIVE DIRECTOR, ADMIN FINANCE OFFICER)**

- Responsible for the implementation of the Global Safeguarding Policy.
- That resources are available to fulfil organisational safeguarding responsibilities.
- Promote a culture where safeguarding is prevalent at all levels and in all programmes and activities.
- To champion safeguarding as a primary consideration in decision making processes, including strategic.
- To ensure safeguarding practice is reviewed and maintained across the organisation.
- Responsible for the operational management of allegations and disclosures, including coordination with supporting bodies, and signposting to relevant organisations.

### **8.3 LEVEL 1: (ADVISORY BOARD CHAIRMAN & EXECUTIVE DIRECTOR)**

- Ensure all reporting staff are aware of their roles and responsibilities under this policy.
- Practice safe recruitment in line with policy guidelines.
- Ensure all staff receive safeguarding orientation and training as a mandatory part of induction.
- To see that the TI-SL safeguarding policy is implemented within respective units and teams, and that procedures to support the policy are implemented, complied with and regularly communicated.
- Support reporting staff to access and utilise safeguarding reporting procedures.

### **8.4 LEVEL 2: (PROGRAMME & FINANCE STAFF)**

- Fully comply with the organisation's safeguarding policies and procedures.
- Attend appropriate training.
- Remain vigilant for signs of abuse.
- Promote welfare and conditions compatible with healthy growth and development.
- Inform designated point person of any concerns.

### **8.5 LEVEL 3: VOLUNTEERS & PARTNERS**

- Trained and inducted to the appropriate level.
- Aware of reporting structures, how to elevate a concern, and to whom.
- Appropriately recruited and screened for role.

## **9.0 RECRUITMENT**

Pivotal to abuse prevention is exercising robust safe recruitment practice. Process and procedures central to this include:

### **9.1 ADVERTISEMENT**

- All roles will be advertised in appropriate spaces and platforms to both encourage the attraction of the most suitable candidates, and to deter the attention of unsuitable candidates.
- All job descriptions will truthfully reflect the remit of the role advertised and the corresponding candidate requirements. This is to promote transparency of expectations for performance in the role, and that candidates lacking the requisite requirements can be efficiently screened. This will help avoid the appointment of an unsuitable candidate.

### **9.2 APPLICATION**

- Candidates will be asked to detail how their skills and experience align to that of the job description, allowing the recruiter to assess suitability for the role.
- Applicants are asked to disclose all criminal convictions, in keeping with the parameters of local



employment law.

- Applicants are asked to account for any gaps in their employment history, and the reasons for leaving each role.
- If it is necessary to assess a person's suitability to work with children due to the nature of their role, then it is permissible to ask about both spent and unspent convictions. This is in adherence with the Exceptions Order to the Rehabilitation of Offenders Act (1974), and may be applied where this does not cause conflict with any local law

### **9.3 INTERVIEW**

- During interview the candidate's motivation for, and attitudes towards working with young people will be explored.
- At least two interviewees will be present for all interviews, ideally with different sets of expertise. This is so that a well-rounded picture of the candidate is captured, and to try and reduce the influence of unconscious bias in the decision making process.
- The candidates understanding and experience of safeguarding will be assessed.

### **9.4 PRE-EMPLOYMENT CHECKS**

- All candidates will be subject to careful reference checking and will not be permitted to start work until satisfactory references are received.
- References for candidates working directly with children, young people or vulnerable adults should ask explicitly about the candidate's suitability to do so.
- Where an employee, volunteer or partner is engaged in 'regulated activity' (direct work with vulnerable individuals), a criminal background check (or in-country equivalent) will be undertaken as part of the recruitment process.

### **9.5 INDUCTION**

It is recognised that crucial to creating an organisational culture that promotes the protection and well-being of young people, safeguarding needs to be embedded from the very beginning of the employee journey.

To this end, all new employees will receive safeguarding orientation and training as a mandatory part of the new starter induction process.

This will include but is not limited to:

- Introduction to safeguarding
- Children, young people. vulnerable adults
- Abuse
- Recognising signs of abuse
- Safeguarding in a TI-SL context
- Understanding roles and responsibilities
- Reporting a concern

All new starters will be required to sign a code of conduct to successfully complete the induction process.

## **10 TYPES AND INDICATORS OF ABUSE**

TI-SL does not limit or restrict its view on what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered. However, the

following categories and accompanying indicators from the Care Act (2014) can act as useful guidelines.

### **10.1 PHYSICAL ABUSE**

Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

Signs of physical abuse can include:

- Fractures, bruising, burns, pain, marks, not wanting to be touched.
- No explanation for injuries or inconsistency with the account of what happened.
- Injuries are inconsistent with person's lifestyle.
- Frequent injuries.
- Subdued or changed behaviour in the presence of a particular person.

### **10.2 SEXUAL ABUSE**

Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

- Signs of sexual abuse can include:
- Bruising, particularly of the thighs, buttocks and upper arms and marks on the neck.
- STDs
- Unusual difficulty in walking or sitting
- Pregnancy in a woman who is unable to consent to sexual intercourse
- Uncharacteristic use of sexual language or significant changes in sexual behaviour or attitude
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear / apprehension of, or withdrawal from, relationships
- Displays a level of sexual knowledge that is inappropriate for age.

### **10.3 DOMESTIC ABUSE**

Including psychological, physical, sexual, financial, emotional abuse, verbal abuse and humiliation and so called 'honour' based violence.

Signs of domestic abuse can include:

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

### **10.4 PSYCHOLOGICAL ABUSE**

Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, or

unreasonable and unjustified withdrawal of services or supportive networks.

Signs of psychological abuse can include:

- Air of silence when a particular person is present
- Withdrawal or change in the psychological state
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss / gain
- Signs of distress: tearfulness, anger
- Attention seeking behaviour

### **10.5 FINANCIAL OR MATERIAL ABUSE**

Including theft, fraud, internet scamming, coercion in relation to financial affairs or arrangement, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Signs of financial or material abuse can include:

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Person allocated to manage financial affairs is evasive or uncooperative
- Family or others show unusual interest in the assets of the person
- Disparity between people's living conditions and their financial resources, e.g. insufficient food in the house.

### **10.6 MODERN SLAVERY**

Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Signs of modern slavery can include:

- Signs of physical or emotions abuse
- Appearing malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers.
- Fear of law enforcers.

### **10.7 DISCRIMINATORY ABUSE**

Including forms of harassment, slurs or similar treatment: due to race, gender and gender identity, age, disability, sexual orientation or religion.

Signs of discriminatory abuse can include:

- Person appears withdrawn and isolated

- Expressions of anger, frustration, fear and anxiety
- The support on offer does not take account of the person's individual needs in terms of protected characteristics

### **10.8 ORGANISATIONAL ABUSE**

Including neglect and poor care practice within an institution. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies processes and practices within an organisation.

Signs of organisational abuse can include:

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- Poor standards of care
- Lack of adequate procedures
- Poor record keeping and missing documents
- Absence of visitors
- Public discussion of personal matters
- Lack of management overview and support

### **10.9 NEGLECT AND ACTS OF OMISSION**

Including ignoring medical, emotional, or physical care needs, failure to provide access to appropriate and available health, care and support or educational services, the withholding of necessities of life, such as medication, adequate nutrition and heating.

Signs of neglect and acts of omission can include:

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Malnutrition unexplained weight loss
- Untreated injuries and medical problems
- Uncharacteristic failure to engage in social interaction
- Inappropriate or inadequate clothing

### **10.10 SELF-NEGLECT**

This covers a wide range of behaviour related to neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Signs of self-neglect can include:

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Inability or unwillingness to take medication or treat illness or injury

### **10.11 ABUSE OF POWER**

8. This covers a wide range of behaviour related to the dynamics of power (in the workplace, community or home). It refers to using a position of power to take unfair advantage of a fellow staff member, community member, partner or volunteer.

Examples of abuse of power can include:

- A member of staff using their position to gain sexual favours from anyone else
- A person with authority controlling or attempting to control the actions of another in the same organisation, project, community etc

## **11 SAFE PROGRAMME DESIGN**

### **11.1 DO NO HARM**

Budget Advocacy Network is committed to the ethical principle 'do no harm', where by it must be considered that in any given situation it may be better not to do something, or even to do nothing - than to risk causing more harm than good through intervention or action. TI-SL will never knowingly implement a programme that could directly or in-directly cause harm.

### **11.2 RESIDUAL RISK**

It is recognised however that there is always a residual level of risk of harm that despite rigorous mitigation would never be possible to completely eliminate. TI-SL is committed to ensuring that this level of residual risk is kept as low as is reasonable practical.

### **11.3 GUIDELINES ON IMPLEMENTING SAFEGAURDING IN PROGRAMMES**

To ensure the level of residual risk remains as low as is reasonably possible, TI-SL aims to adopt the following minimum standards to bench mark all programmes:

At least one safeguarding focal point is identified who has clearly defined safeguarding responsibilities. (In-country programmes – this is likely to be the Executive Director, who also assumes the position of proxy safeguarding lead in-country.

- A risk assessment is conducted considering all aspects of the programme that may directly or indirectly harm children, young people or vulnerable adults.
- Design should consider limiting as far as is practical the potential for anyone working for or on behalf of TI-SL from being in a position where they might find themselves in a completely private, or one – on – one situation with a child, young person or vulnerable adult.

## **12 WORKING WITH PARTNERS**

- It is recognised that there are inconsistencies in the establishment and rigour of safeguarding policies and practice across organisations. This can include variance in safeguarding comprehension, literacy and training. These inconsistencies can be further compounded when operating in different legal, social and cultural contexts.
- This disparity can have the potential to threaten the safety of programmes, and increase exposure to risk both for TI-SL and those with whom the organisation comes into contact with.
- The provision and primacy of safeguarding in a partner organisation should be a key determinate factor in the decision to enter into and establish a partnership. The Partnership Consideration Tool (Appendix 3) should be used to help establish the suitability of working in partnership with another organisation.
- TI-SL will work to support, as far as is reasonably practicable, partner organisations with a lower degree of safeguarding experience, rigor or protocol to safely and effectively fulfil their organisational responsibilities and deliver on partnership goals.

*(See appendix 11 – Partnership consideration tool)*

## **12.1 PARTNERSHIP TERMINATION**

- If it is considered that a partner is not effectively fulfilling its safeguarding responsibilities, then TI-SL may decide to not enter a partnership.
- If once a partnership has been established it is evident that acceptable practice is not being observed, then TI-SL may decide to terminate the partnership on these grounds

## **13. CONFIDENTIALITY**

Transparency International Sierra Leone is committed to maintaining the confidentiality of personal information

that it handles. Any information given or received in confidence for one purpose will not be used for another purpose, or passed to a third party, without the express consent of the individual except in special circumstances e.g. to prevent further harm to an individual.

TI-SL will aim to ensure that personal information is obtained, used and disclosed in accordance with the common law duty of confidentiality and the Data Protection Acts 1998 and 2018.

### **13.1 CONFIDENTIAL INFORMATION**

Examples of confidential information include:

- Personal information of a private or sensitive nature.
- Information that is not already lawfully in the public domain or readily available from another public source.
- Information that has been shared in circumstances where the person giving the information could reasonably expect that it would not be shared with others.

### **13.2 SHARING INFORMATION APPROPRIATELY AND SECURELY**

If information is shared, it should be shared in a proper and timely way, and in accordance with the principles of the Data Protection Acts of 1998 and 2018. In relation to sharing information at the front-

line, the following can be used to guide best practice and compliance:

- Share only the information necessary for the purpose for which it is being shared.
- Understand the limits of any consent given, especially if the information has been provided by a third party.
- Distinguish clearly between fact and opinion.
- Share the information only with the person or people who need to know.
- Check, as far as is reasonably practicable that the information is accurate and up-to-date.
- Share it in a secure way, for example, confirm the identity of the person you are talking to; check that a conversation or phone call cannot be overheard; use secure email; check that the intended person will be on hand to receive a fax.
- Establish with the recipient whether they intend to pass it on to other people and check they understand the limits of any consent that has been given.
- Inform the person to whom the information relates and, if different, any other person who provided the information, if you have not done so already and it is safe to do so.

## **14 SUPERVISION**

When working with groups of children or young people, it is important that the level of supervision is appropriate to their age group and their needs, which may be very specific. In general, younger children need to be more closely supervised and will require a higher adult to child ratio.

### **14.1 EFFECTIVE SUPERVISION**

It is the responsibility of those commissioning, planning or providing sessions/activities to see that

those running the activity are suitable to do so. In ascertaining the suitability of persons providing supervision, the following should be considered:

- The nature of the activity (including its duration).
- The location and environment in which the activity is to take place.
- The age and gender (including developmental age) of the young people to be supervised.
- The ability of the young people (including their behavioural, medical, emotional and educational needs).
- Supervising personnel are safely recruited and screened in-line with organisational requirements.
- Supervising personnel have signed a code of conduct
- Staff competence - appropriately experienced / trained / qualified to supervise both the activity and group demographic.
- Staff have an understanding of their safeguarding responsibilities.
- Covered by appropriate insurance

### **14.2 RATIOS**

The following ratios can be used as guidelines when assessing the appropriate level of supervision required for a particular activity. If the group is mixed gender, the supervising staff should also include

both male and female workers wherever possible.

- I. Aged 0 - 2 years: 1 adult to 3 children
- II. Aged 2 - 3 years: 1 adult to 4 children
- III. Aged 4 - 8 years: 1 adult to 6 children
- IV. Aged 9 - 12 years: 1 adult to 8 children
- V. Aged 13 - 18 years: 1 adult to 10 children
- VI. Young adults (18 – 25 years): 1 supervisor to 15 young adults

The above ratios should be used as a guide only, as appropriate levels of supervision can vary according

to a range of factors, including but not limited to:

- I. Age (see above)
- II. Gender
- III. Behaviour
- IV. Abilities within group

- V. Nature and duration of activities
- VI. Competence and experience of staff involved
- VII. Requirements of location, accommodation or organisation based
- VIII. Any special medical needs
- IX. Specialist equipment needed

## **15 ONLINE SAFETY**

These guidelines are by no means exhaustive, and should be considered a tool to help support the implementation and management of online safeguards.

- If a profile or group is set up by Restless Development it is essential that a member of staff joins as a moderator to oversee content and activity.
- The role of the moderator should be to monitor conversations, images and other activity of group members and challenge, educate and intervene as necessary.
- Moderators should take responsibility for educating members of the group about online safety, including how to customise privacy settings.
- Sufficient moderation should be in place to inhibit anyone working for on behalf of Restless Development from having a private conversation with a child, including the moderator.
- This extends to email correspondence, which may mean replacing personal email addresses with a group inbox, and text messages which may require the use of a team phone that multiple staff have access to
- Staff should not make use of their personal social media accounts for the purpose of delivering Restless Development activities. In such cases a new account should be opened that enables the staff member to maintain boundaries between their personal and professional lives.
- Staff must not publish images of people unless consent has been given in writing.

### **15.1 NEW MEDIA**

Social media evolves rapidly, and in response TI-SL needs to consider the potential risks inherent in new forms of media. The following questions can be used to help guide this conversation:

- Could a TI-SL member of staff or volunteer use this social medium to develop a private relationship with a child, young person or vulnerable adult?
- Could use of this social medium facilitate any other form of harm to a child, young person or vulnerable adult? (E.g. could it bring them in contact with a third party who poses a risk of harm?)

## **16 MEDIA AND THE USE OF IMAGES**

### **16.1 COMMITMENT**

All photos taken should respect human dignity and consider the rights, safety and well-being of the person or people being portrayed.

### **16.2 MINIMUM STANDARDS**

- Comply with local traditions or restrictions when taking photos of people, objects or places.



- Inquire into national laws related to photography and privacy rights.
  - Gain verbal or written consent before taking photographs.
  - Respect a person's right to refuse to be photographed. If you sense any reluctance or confusion, refrain from taking the photo.
- 
- Do no harm. Individuals or groups may be put at risk of reprisal, violence or rejection in their communities as a result of exposing their identity or personal story through the publication of their image.
  - Do not misrepresent the individual, situation or context of the photo.
  - Absolutely no payments or any other form of compensation are to be provided to subjects in exchange for their photo or consent

### **16.3 LARGE CROWDS**

- When taking images at an event attended by large crowds, such as a sports event, this is regarded as a public area and so permission is not required from everyone in a crowd shot. People in the foreground are also considered to be in a public area

### **16.4 SAFE STORAGE OF IMAGES**

- Once a picture has been taken and written consent to use it has been obtained, it is necessary to store the images appropriately. A risk based approach should be adopted to determine what measures are appropriate for the safe internal storage of images

### **16.5 DATA PROTECTION**

- It is important to remember that images of people constitute personal data, particularly if they are processed in conjunction with other personal data such as names and addresses. As such the Data Protection Act 1998, enhanced by the 2018 Act, refers to the processing of all personal images, including their capture, retention, storage, sharing and destruction.

### **16.6 ETHICAL USE OF PHOTOGRAPHY**

- Photos and captions used to illustrate or support written materials should be factual and in keeping with the context of the story.
- No photo of a recognisable individual(s) to be falsely captioned or used in such a way as to imply information about that person.
- Use disclosures where there is the risk of misunderstanding (e.g. "The photos in this material are used for illustrative purposes only: they do not imply X on the part of any person who appears in the photos".)
- Care needs to be taken not to stereotype certain groups e.g. beware of the repeated use of images of particular ethnic groups, nationalities or genders when illustrating particular issues.
- If photos are edited to protect identities, this must be noted and explained.
- Photos of individuals should illustrate autonomy and dignity of person