



Safeguarding Policy

Approved by the Board on 21 March 2024

Contents

Introduction	1
Context	1
What is Safeguarding?	2
Why Safeguarding is Important for Caplor Horizons	2
Scope of Policy	2
Key Aspects of Safeguarding	3
Responsibilities of Staff, Trustees and Advisors	6
Responsibilities of Staff	7
Responsibilities of Trustees	8
Responsibilities of Advisors	8
Sources on Safeguarding	8
Appendix 1: VSO Definitions Relating To Safeguarding	9
Appendix 2: Sources on Safeguarding	10

Safeguarding Policy

Introduction

The purpose of this Policy is to help us to have a common understanding of safeguarding issues, develop good practice across Caplor Horizons and increase accountability in this crucial aspect of our work.

The Board has agreed this Policy to provide clarity to all involved with Caplor Horizons on our approach and standards of safeguarding with everyone we work with, including but not limited to children, young people and vulnerable adults. It is also intended to help us make sure that Staff, Trustees and Advisors are protected and to demonstrate how we meet our legal obligations. This Policy articulates:

- What safeguarding means for Caplor Horizons and why it is important
- Key aspects of safeguarding including culture, principles, recruitment and implications for partners and clients
- The responsibilities of Staff, Trustees and Advisors with respect to safeguarding

This policy applies to all Caplor Horizons Staff, Trustees and Advisors. It will be reviewed annually to ensure it remains fit for purpose.

Context

Safeguarding has grown to be a major issue in the international development sector in recent years. In the wake of revelations from international development charities, there has been increasing recognition of the way in which children, young people and vulnerable adults can be at risk of discrimination, neglect, abuse and exploitation by those who are in positions of trust and power over them, including through international development activities. In 2017, the Charity Commission published new guidance on safeguarding focused on the role of trustees.¹ This was followed by their summary of “10 actions trustee boards need to take to ensure good safeguarding governance”.² DFID hosted an international conference on the topic in October 2018 and Bond published a 12 point commitment by NGOs focused on sexual exploitation, abuse and sexual harassment in the aid sector.³ Eight international NGOs published their own “safeguarding promises”.⁴

There has been a significant increase in the efforts made by international development organisations to ensure that there is no harm done within their organisations or to the people they work with. A fundamental principle that has emerged is that the response to breaches of safeguarding should centre on what is best for the victim.

¹ <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740348/revised_safeguarding.pdf

³ https://www.bond.org.uk/sites/default/files/resource-documents/bond_safeguarding_commitments_online.pdf

⁴ <https://www.savethechildren.org.uk/content/dam/gb/reports/policy/181018-our-safeguarding-promises.pdf>

What is Safeguarding?

Safeguarding is an organisation's responsibility to avoid harm to its staff, volunteers, trustees, beneficiaries and any other individual with whom it works. More fully, safeguarding is the responsibility that an organisation has to ensure that:

- its employees and volunteers, trustees, partners, operations and programmes do no harm to anyone, taking especial care over children, young people and vulnerable adults
- it does not expose them to the risk of discrimination, neglect, harm and abuse
- any concerns the organisation has about the safety of vulnerable people within the communities in which it works are dealt with and reported to the appropriate authorities
- it protects its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

As is laid out in the definitions in Appendix 1, harm can include various forms of discrimination, psychological pressure, sexual abuse and violence.

Why Safeguarding is Important for Caplor Horizons

Caplor Horizons is an organisation that prioritises the wellbeing of our Staff, Trustees, Advisors, partners, clients and other stakeholders. Protecting people from harm is an important element in achieving our vision of a world in which social, environmental and economic progress is balanced. Our value that "Everyone matters" reflects an ethical stance that underpins all safeguarding.

In addition, in our strategy our goal to Reframe Horizons includes leadership development of young people, work in which safeguarding is especially important. Furthermore, our Staff, Trustees and Advisors are often meeting vulnerable people when working with clients. Finally, as the #MeToo campaign shows, safeguarding is not just about children, young people and vulnerable adults: it is about everyone.

Therefore having a robust approach to safeguarding is central to our way of working. Safeguarding means protecting people in our organisation or people we come into contact with from inappropriate behaviour as well as from abuse and harm. It is the responsibility of everyone.

Scope of Policy

This Safeguarding Policy concerns all Staff, Trustees and Advisors wherever they are working. It complements other policies such as:

- Code of Conduct
- Equal Opportunities Policy
- Grievance Policy
- Harassment and Bullying Policy
- Privacy Policy
- Social Media Policy
- Whistleblowing Policy
- Employee, Governance and Advisor Handbooks.

The Policy also concerns what Staff, Trustees and Advisors may encounter when working with clients and partners of Caplor Horizons, making full allowance for cultural and religious differences.

Key Aspects of Safeguarding

This section describes the principles that underlie Caplor Horizons' approach to safeguarding. The following key aspects of safeguarding are discussed in turn:

1. Organisational Culture
2. Communications and Engagement
3. Standards, Policies and Procedures
4. References Policy
5. Recruitment and Induction
6. Selection for Projects
7. DBS Checks
8. Training
9. Reporting
10. Work with Partners and Clients

1. Organisational Culture

Culture plays a significant role in ensuring effective safeguarding processes or, conversely, in tolerating poor behaviour. For Caplor Horizons, a culture of openness, transparency, distributed power, humility, respect and trust is essential for safeguarding.

In particular, we should recognise our position of perceived power when acting as an external advisor or trainer with teams and organisations, and the potential impact the abuse of this power could have on those involved.

2. Communications and Engagement

Clear communication of safeguarding expectations and standards supports a shared culture that prioritises safeguarding. In addition, having safeguarding as part of regular communications within Staff, Trustee and Advisor teams ensures a suitable focus and consciousness of safeguarding. The language and understanding of wellbeing, unconscious bias and power and influence are central to how Caplor Horizons operates, supporting engagement with safeguarding.

3. Standards, Policies and Procedures

A safeguarding culture is strengthened by having clearly articulated and understood standards, policies and procedures that are shared with everyone involved in Caplor Horizons.

The following principles are intended to ensure that any action on a breach of safeguarding is handled appropriately and effectively:

- Any breach of safeguarding should be reported and recorded in writing.
- All sensitive and personal data should be kept confidential (including the names of anyone who makes a report of abuse), and should be shared only with those whose work requires the information.
- A member of Staff and a Trustee should be identified to lead the case.
- See guidance below on reporting.

4. References Policy

Caplor Horizons' policy on giving references is as follows:

- References can only be given by a Co-Director or a Trustee, using a Caplor Horizons e-mail address.
- References confirm dates and posts held and include a summary of performance.
- Any substantiated safeguarding concerns are noted.
- Problematic references are referred to the Board followed by a recording of decisions and their rationale.

5. Recruitment and Induction

Clarity on role expectations is an important first step towards effective safeguarding. Role descriptions should highlight the commitment of the organisation to safeguarding and the responsibilities of Staff, Trustees and Advisors. Staff recruitment can build a comprehensive understanding on both sides through interviews, references, introductory periods and induction.

Caplor Horizons has a more relational approach to building its teams of Trustees and Advisors. It is therefore important to take time in conversations and when building relationships with potential Trustees and Advisors to be explicit about safeguarding responsibilities and standards. The Governance and Advisor Handbooks and Safeguarding Policy are tools to enable this.

In addition, the current process of inviting those interested in joining our community to attend Community Days acts as a good way for the individual to get to know more about Caplor Horizons as well as an opportunity for us to see how they fit into the culture.

6. Selection for Projects

We have a great variety of different activities which have different risk profiles.

As a starting point, we have a safeguarding duty over anyone involved in working with us. Therefore, as a minimum for anyone engaging with us (especially for those engaged more informally in less public facing roles), there should be an informal chat about what the role demands, including health and safety guidelines, and what the volunteer can expect to gain from the opportunity.

More robust processes are needed for Advisors working directly with clients and beneficiaries, especially if these are classed as vulnerable people. These processes should be managed in a way that minimises barriers to volunteering but reduces risks.

7. DBS Checks

If an opportunity includes work that involves close and unsupervised contact with vulnerable adults and children – known as Regulated Activity – then it is necessary to check whether the individual is included in either of the two Disclosure and Barring Service (DBS) “barred lists” of individuals who are unsuitable to work with children or vulnerable adults. This is a legal responsibility for Caplor Horizons in the case of work in the UK and it is a criminal offence to recruit someone for work from which they are barred. Likewise, it is a criminal offence for someone to seek or carry out UK work in activities from which they are barred.

An enhanced DBS check with barred lists is a check of criminal records that will show spent and unspent convictions, cautions, reprimands and final warnings plus any information held by local police that is considered relevant to the work. It will also check if the individual is on the barred lists. Many Advisors will have had a DBS check already. For some, a DBS check can feel intrusive and an unnecessary invasion of their privacy. Careful consideration should be given as to whether it is necessary to obtain a disclosure in any case not involving a Regulated Activity or whether other measures offer sufficient safeguarding.

Regulated Activities that relate to the work of Caplor Horizons are as follows, where “regular” means carried out by the same person on four or more days in a 30 day period:

- Providing regular, unsupervised training, coaching or mentoring to children and young people
- Providing regular, unsupervised training, coaching or mentoring to vulnerable adults
- The day-to-day management or supervision on a regular basis of any person carrying out the activities mentioned above.

Caplor Horizons is committed to ensuring that when a role or project involves the likelihood of such Regulated Activities, including outside the UK, the Staff, Trustees and Advisors involved will be requested to have an enhanced DBS check with the relevant barred list. Caplor Horizons will cover the cost and make sure there is minimum bureaucracy. If an Advisor fails a DBS check the consequences will depend on the nature of what they did and how long ago it was.

8. Training

Training programmes or workshops enable Staff, Trustees and Advisors to study safeguarding in more detail and learn from the practices and experiences of others. Caplor Horizons is offering training on power, unconscious bias, wellbeing and safeguarding to all Staff, Trustees and Advisors involved in direct delivery. At times external courses may be helpful as well.

Caplor Horizons normally operates in teams of 2 or more and there should be opportunities at the beginning and end of programmes to discuss any concerns and how things might be improved.

9. Reporting

The first priority is to support the victim. There should be careful consideration of the risks for the victim before reporting to external authorities. Identification of the victim could lead to additional harm such as difficulty finding work or loss of marriage prospects. Considerations should be recorded. Serious incidents in the UK should be reported to the police, local authorities (for cases involving children and vulnerable adults) and the Charity Commission.

Guidelines for Caplor Horizons’ annual reports are as follows:

- Aim for transparency about incidents and problems faced without naming people
- Report trends in incidents
- Describe steps taken following incidents, lessons learned and changes made.

10. Work with Partners and Clients

Safeguarding in relation to the staff and beneficiaries of partners and clients involves potentially difficult judgements. Care is needed in the face of cultural and religious differences, compounded by differences in perceived power and authority. The imposition of British rules about safeguarding on a partner organisation could seem very like a manifestation of the imbalance of power that lies at the heart of safeguarding issues. It is more a matter of ethics and organisational values than direct and legal responsibility, though there could also be damage to Caplor Horizons’ reputation from a safeguarding incident in a partner or client. Some guidelines that may or may not be appropriate in a given situation are as follows, where “partners” means partners or clients:

- Analyse areas of potential risk in a prospective partner’s work.
- Ensure partners have appropriate policies and procedures for safeguarding, safety, security, whistleblowing and complaints that are public, easy to use and updated as lessons are learned.
- Agree a shared code of conduct including safeguarding, whistleblowing and complaints policies.

- When carrying out due diligence, check that partners have appropriate controls and procedures in place, including adequate safeguarding measures.
- Include safeguarding measures in the partner agreement.
- Ensure that Caplor Horizons is always notified if the partner has a safeguarding incident - and vice versa.
- Help partners by offering Caplor Horizons' policies and learning materials.

Responsibilities of Staff, Trustees and Advisors

All Staff, Trustees and Advisors are committed to following this Policy and maintaining an environment that prevents exploitation and abuse and encourages reporting of breaches of this Policy using appropriate procedures.

All Staff, Trustees and Advisors are responsible for the following:

- Promoting best practice safeguarding approaches and supporting their development with partner and client organisations
- Studying and complying with this Safeguarding Policy and the Code of Conduct in the relevant Handbook
- Striving to develop relationships which are based on equity, trust, respect and honesty
- Placing the safety and welfare of children and vulnerable people above all other considerations
- In a one-to-one situation with a child or young person, where privacy and confidentiality are important, trying to make sure that another adult knows what is happening and why. If possible, ensuring another adult is in sight and that the child or young person knows another adult is around.
- Reporting any concerns they may have about the welfare of a child or vulnerable person
- Reporting any concerns they may have about the behaviour of a Caplor Horizons representative in relation to safeguarding

Reporting should generally be to a Co-Director in the first instance, even if the concerns relate to a partner or client. As ever, the first priority is to support the victim. The procedure followed by the Co-Director on receiving a report should be guided by that laid out in the Whistleblowing Policy for how to act following an allegation by a whistleblower.

If the concerns relate to a Co-Director or a Trustee they should be reported to the Chair. If they relate to the Chair they should be reported to any other Trustee who will consult with other Trustees to nominate an appropriate internal or external investigator.

All Staff, Trustees and Advisors should not do the following:

- Sexually harassing, assaulting or abusing another person
- Physically harassing, assaulting or abusing another person
- Emotionally abusing another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade
- Condoning or participating in behaviour which is abusive, discriminatory, illegal or unsafe
- Tolerating sexual harassment or abuse in any working environment
- Developing, encouraging or failing to take action on relationships with children or vulnerable people that could in any way be deemed sexual, exploitative or abusive
- Acting in ways that are violent, inappropriate or sexually provocative
- Agreeing with a child to keep a secret which has implications for their safety or the safety of others.

All Staff, Trustees and Advisors have an obligation to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation of anyone or which suggest this Policy may have been breached in any other way. It is not the responsibility of Staff, Trustees or Advisors to decide whether or not abuse has taken place, but all concerns should be reported to a Co-Director.

Data Protection, Publications and Social Media

Caplor Horizons is committed to ensuring that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialised child welfare or law enforcement agency in relation to a safeguarding incident. (For more detailed guidance, please refer to the Privacy Policy.)

Specifically relating to the protection of children, young people and vulnerable adults in publications and on social media, we will follow the following guidelines:

- Using names and images of children, young people or vulnerable adults which are respectful and not exposing them to further vulnerability.
- Reproducing images and using the names of children only when we have the permission of their parents / guardians.
- Reproducing images and using the names of young people and vulnerable adults only where we have their permission or that of their parents/guardians, whichever is the most suitable.
- Making clear to vulnerable people and their families, where relevant, that agreement to providing information or images is not a condition of involvement in Caplor Horizons activities and programmes.
- Not distributing any information or violent or sexual images that may be harmful to vulnerable people.

Further helpful guidance is given in the Dóchas Code of Conduct on Images and Messages.⁵ Please also see our Social Media Policy.

Responsibilities of Staff

In addition to the general responsibilities of all Staff, Trustees and Advisors listed above, Staff have further responsibilities as follows:

- Ensuring Staff, Trustees and Advisors are aware of the Policy and are supported to implement it
- Supporting a management culture that encourages a focus on safeguarding
- Raising safeguarding when working with partner and client organisations and encouraging good practices
- Acting immediately if they become aware of any safeguarding concerns, and supporting Staff, Trustees or Advisors who complain or raise concerns.
- Handling and recording reports or concerns appropriately and in accordance with the principles that underpin this Policy
- Ensuring referrals to the relevant authorities happen without delay
- Discussing risks to safeguarding as a priority at Staff meetings
- Ensuring our Advisor Handbook includes clarity on our safeguarding standards, expectations of Advisors, responsibilities of the organisation and Advisors as well as processes to follow if any concerns are raised

⁵ <https://dochas.ie/images-and-messages>

- Ensuring all Staff attend safeguarding workshops or training
- Developing and offering training to all Staff, Trustees and Advisors involved in direct delivery on power, unconscious bias, wellbeing and safeguarding
- Ensuring that time is allocated to reflecting and learning from programme experiences
- Ensuring that all Staff and Trustees have an enhanced DBS check with the barred list for working with children as well as Advisors involved in work relating to regular, unsupervised contact with vulnerable people, with the relevant barred list
- Including safeguarding in annual reviews
- Ensuring this policy is reviewed at least once a year and is available to the public.

In addition Co-Directors need to know where to find specialist help in the event of a problem.

Responsibilities of Trustees

The Board of Trustees holds ultimate accountability for this Policy.

In addition to the general responsibilities of all Staff, Trustees and Advisors listed above, Trustees have further responsibilities as follows:

- Trustees should be aware of their influence on the culture of Caplor Horizons, expressed in ways such as how they spend their time at Board meetings, what they measure, transparency, how seriously they treat safeguarding issues and how they behave towards each other and Staff.
- Any risks to safeguarding should be discussed as a priority at Board meetings.
- Safeguarding should be included in the risk register.
- Trustees should consider crisis response, being clear about who would do what in a crisis.
- Organisational policies should reflect the operational realities of how and where we work.
- If there is an issue about values it needs to come to the Board – and the decision must then be rooted in Caplor Horizons’ values.
- Trustees should be aware of what other NGOs, Bond and the Charity Commission are doing about safeguarding.
- Trustees involved in direct delivery are encouraged to attend training on power, unconscious bias, wellbeing and safeguarding.

Responsibilities of Advisors

In addition to the general responsibilities of all Staff, Trustees and Advisors listed above, Advisors have further responsibilities as follows:

- Advisors involved in direct delivery are encouraged to attend training on power, unconscious bias, wellbeing and safeguarding.
- Advisors should ensure that time is allocated to reflecting and learning from programme experiences.

Sources on Safeguarding

For more information on safeguarding and on the information used in this document please see Appendix 2.

VSO Definitions Relating To Safeguarding

Abuse - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult.

Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Discriminatory abuse – abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Neglect - the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Sexual abuse - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Child – Caplor Horizons regards a child as anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Vulnerable person/people – for the purposes of this Policy this is an umbrella term which covers children, young people and vulnerable adults.

Vulnerable adult - a person 18 years and above who, by reason of disability, age, gender, social and economic status, illness or the context they are in, may be unable to take care of or to protect her or himself against abuse, harm or exploitation.

Youth or young people - individuals aged 15 to 25 (15 to 35 in some countries) – Caplor Horizons recognises that this group spans the categories of ‘children and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

Appendix 2

Sources on Safeguarding

For more information on safeguarding and on the information used in this document please see:

<https://knowhownonprofit.org/organisation/operations/safeguarding>

<https://www.bond.org.uk/ngo-support/safeguarding-guidance-and-resources>

<https://keepingchildrensafe.org.uk/how-we-keep-children-safe/capacity-building/resources/child-safeguarding-standards-and-how-implement>

<http://www.charitycommissionni.org.uk/news/essential-safeguarding-good-practice-seminar-resources/>

<https://blogs.ncvo.org.uk/2018/03/06/safeguarding-do-you-need-to-update-what-youre-doing/>

<https://knowhownonprofit.org/your-team/volunteers/keeping/ncvosafeguardingforvolunteerinvolvingorgs.pdf>

https://keepingchildrensafe.org.uk/sites/default/files/resource-uploads/KCS_STANDARDS_2014.pdf

<https://www.vsointernational.org/news/blog/our-commitment-to-the-worlds-most-vulnerable>

<https://www.ukyouth.org/what-we-do/#training>

<http://www.volunteernow.co.uk/fs/doc/publications/safeguarding-children-and-adults-policy-standards-sept-2016.pdf>

<http://www.charitycommissionni.org.uk/media/151331/20180531-safeguarding-seminar-notes.pdf>