



## IDS Safeguarding Policy

### Policy Statement

IDS has high expectations of professionalism from its staff and all those in the wider IDS community, both in our own workplace and in the settings we work in around the world, often with vulnerable people. We expect people to behave always in a way that is in-keeping with our values – of respectfulness and inclusivity, as well as excellence and resourcefulness, and our vision of equal and sustainable societies, locally and globally, where everyone can live secure, fulfilling lives free from poverty and injustice. These are values and modes of behaviour that are an embedded, implicit part of the culture, ethics, and professionalism of IDS.

This document sets out the Institute's policy on safeguarding the welfare of children and adults at risk of harm ('adults at risk'). IDS has zero tolerance for sexual exploitation, abuse, intimidation, bullying or harassment, or other exploitation or abuse of power, particularly of vulnerable people. IDS is committed to safeguarding children and adults at risk, to treating all people with respect and dignity and to challenging any form of bullying, harassment, discrimination, intimidation, exploitation or abuse.

The policy should be read in conjunction with the following policies and guidance, which together form an ethical framework to guide those working at or for IDS or in our name:

- policy to prevent Harassment and Bullying at Work
- Whistleblowing Policy
- Complaints Procedure
- Disciplinary Procedures
- Due Diligence Policy
- Research Ethics Policy
- Code of Conduct of behaviour
- Equality, Diversity, and Inclusion policy
- Overseas Travel and Security Policy
- Health, Safety and Wellbeing Policy
- Records Management Policy

The policy aims to:

- Promote and prioritise the safety and wellbeing of children and adults at risk across all of IDS's work, in whatever setting it may take place.
- Provide assurance to our partners, funders and beneficiaries that IDS takes reasonable steps to manage risks and keep children and adults at risk safe.
- Ensure that all who are working at or for IDS or in our name understand their own and partners' roles and responsibilities in respect of safeguarding and are provided with the necessary information, training and support on safeguarding matters.

- Ensure that all who are working at or for IDS or in our name have access to and are familiar with the relevant guidance on working with children and adults at risk (see appendix 1).
- Prevent the employment of individuals in work with children and/or adults at risk where they have been barred by the Disclosure and Barring Service (DBS) or are deemed by the Institute to pose an unacceptable risk to vulnerable groups.
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to children or adults at risk arising from contact with IDS staff or students, on the IDS premises or elsewhere.

Any suspicions and allegations involving harm to children and adults at risk will be referred to the police, the DBS or other relevant authority if required and where appropriate.

An incident will be reported to the Charity Commission if it meets the Commission's criteria of a serious incident. For safeguarding incidents this means incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with the charity through its work. It is the responsibility of the IDS Chair of the Board of Trustees to ensure the reporting of incidents to the Charity Commission.

There may be additional reporting requirements to funders.

All who are working at or for IDS should use this policy as a basis to develop appropriate approaches to safeguarding, harassment and bullying in relation to the individuals, organisations, and communities involved in their work, including activities with colleagues that take place within IDS (whether face to face, hybrid or virtual). They should also follow the relevant guidance when working with children and adults at risk (see appendix 1) and undertake planning, risk assessments and approvals as required. Individual research projects and programmes, as well as PhD researchers and other students should also follow the relevant research ethics process (the IDS Research Ethics Policy for staff and the University of Sussex policy for all students).

Examples of IDS activities that may involve children or adults at risk:

- Research activities.
- Teaching activities.
- Events in the IDS building, online or hybrid.
- Public events and lectures on or off Campus which are aimed at a broader public audience.

## **Definitions**

A child is any person under the age of 18.

Adults aged 18 and over have the potential to be at risk of harm (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be at risk of harm if they:

- Has a learning or physical disability
- Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs
- Has a reduction in physical or mental capacity
- Is in receipt of any form of healthcare
- Is detained in custody
- Is receiving community services because of age, health or disability
- Is living in sheltered, residential care home, temporary shelter or refugee camp.

- Is unable, for any other reason, to protect themselves against significant harm or exploitation.

It is recognised that people who meet one or more of the criteria above may not be at risk of harm at all, or all of the time. For the purposes of this policy an adult at risk of harm should be defined as such if they meet one or more of the above criteria. IDS recognises that there is a potential for all persons to be or to become at risk of harm and does not assume that victim/survivor status or geographical location automatically equates to universal vulnerability. Therefore, a broad, preventative approach should be taken.

## **Procedure**

### **Raising awareness of the policy**

Line managers and Cluster Leaders must ensure that all new members of staff are made aware of this policy and that they are given time to read it during their induction period.

Programme, project leaders and Principal investigators must ensure that partners are aware of IDS's approach to safeguarding, in line with our Due Diligence Policy.

Training and guidance will be provided, and all staff are required to participate in regular training.

### **Undertaking a safeguarding risk assessment**

All IDS's work should be planned and undertaken in an inclusive and accessible way, which includes anticipating unknown eventualities and which reflects good practice. A risk assessment should be completed as a matter of course to identify risks and take actions to eliminate or mitigate them, and an additional safeguarding risk assessment should be undertaken by the project lead/Principal Investigator, the line manager or Cluster Leader, or by HR in the following cases:

- Recruitment to a new or existing post which involves working with children and/or adults at risk.
- The commencement of new activities or events involving or potentially involving children and or adults at risk.
- Changes being made to activities or events involving or potentially involving children and or adults at risk.
- Where the research ethics process identifies this is required.
- Any other situation where a member of the Board, the Lead Trustee for Safeguarding, the Director of HR or any other member of SLG identifies it as needed.

The risk assessment should:

- Identify the nature, length and frequency of the activity.
- Consider if there will be children or adults at risk who are particularly at risk.
- Consider whether any children or adults at risk have allergies, are on medication, have any disabilities, or any behavioural difficulties.
- Identify any potential areas for harm.
- Evaluate the risks.
- Determine actions to prevent harm occurring or to mitigate the potential harms, which might include consideration of alternative working practices, and prompt individuals to ensure that they are implemented.
- Identify those situations that would require a DBS check or a basic disclosure check.

## **Identifying required checks**

Once the key duties and responsibilities of the activity are determined, one of the required actions must be to identify which checks, if any, are required prior to the individual working with children and/or adults at risk.

All prospective IDS staff are required to declare any unspent convictions at the application stage. The employment of all new IDS staff is subject to a satisfactory reference check.

Where a risk assessment identifies the need for further checks, such as a DBS check, these will be carried out prior to an individual undertaking any duties which would bring them into contact with children or adults at risk.

## **Dealing with reported suspicions and allegations**

Concerns for the safety and wellbeing of children and adults at risk could arise in a variety of ways and in a range of situations. For example, a child/ adult at risk may report or show signs of abuse, someone may hint that a child/adult at risk is at risk or that a colleague is an abuser, or someone may witness abuse. It is not always easy to recognise a situation where abuse may occur or has taken place and IDS employees are not experts at such recognition. However, each person has a responsibility to act if they have any concerns about someone's behaviour towards a child or adult at risk.

It is important that the recipient of any complaint or accusation that a child or adult at risk has been or is being abused listens carefully without making or implying any judgement as to the truth of the complaint or accusation. To ensure that all the details of an allegation are captured for any future investigation, a detailed record should always be made at the time of the matter being raised.

It is impossible to promise complete confidentiality when a concern is raised or an accusation made. This is because the Institute owes a duty of care to its staff, students and the individuals, organisations and communities that it works with that cannot be fulfilled unless IDS takes action on the basis of information that may have been provided in confidence. The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm of an individual. Individuals raising a concern will be kept informed of procedural stages and outcomes.

However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external to the Institute, should be informed and the rights of individuals involved should be central and protected. Where an individual suspects or is informed that a child or adult at risk has been, is being or could be harmed as a result of taking place in an Institute activity/event or through contact with IDS staff, volunteers or students, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual aware of these suspicions or allegations must contact the relevant Cluster Leader, Director of HR or a member of SLG immediately for guidance and assistance on the action that must be taken. In cases that involve students, the same process should be followed and the relevant SLG member will liaise with the University of Sussex to establish the appropriate response.

Staff who are worried about sharing concerns about abuse are encouraged to speak with an appropriate agency for further advice (for example, in the UK, the NSPCC Child Protection Helpline on 0808 800 5000 or Childline on 0800 1111). Where a complaint of abuse is reported, the Director of HR with the Chair of the Board and the Lead Trustee for

Safeguarding will carefully consider the information available and decide on the appropriate course of action. Such situations may require contact with the relevant external agencies (including, in the UK, social services and the police) for them to investigate the matter and determine any necessary action. Consideration will also be given to whether it is necessary to notify the relevant line manager/cluster leader or head of another institution and take further action through the relevant internal procedures. This may include invoking the Institute's disciplinary procedures, or in the case of students, the University of Sussex student disciplinary procedures. In emergency circumstances (for example, where there is certain immediate and significant danger to an individual or a criminal act has been witnessed), staff should (in the UK) make referrals to the police, social services or other appropriate authorities themselves prior to consulting with HR. Where this is necessary, HR should be informed immediately afterwards. In such cases, a criminal investigation may follow. In some contexts or countries contacting police or other authorities could put a child or adult at risk at further risk of harm. Where the requirements of this policy are not compatible with the regulatory, statutory or legislative framework of another country, those frameworks usually take precedence, though individuals should seek advice where there is any doubt and before taking any action.

The Institute has a legal duty to refer an individual to the DBS if they have been removed from working in regulated activity with children and/or adults because they caused harm to children/adults or posed a risk of causing harm. The duty to refer is absolute and overrides any concerns about data protection.

The Board of Trustees will consider and discuss an annual report on safeguarding matters. Any significant or potentially significant safeguarding issues which arise will be reported to the Chair of the Board of Trustees as soon as possible.

### **Storage of Data and records**

The Institute complies with the principles of the General Data Protection Regulations in the way it collects, holds and disposes of personal information. Records will be retained in accordance with the Institute's [Records Management Policy February 2020.pdf \(sharepoint.com\)](#).

Information about any allegations or suspicions of abuse must be shared on a need-to-know basis only. Documentation related to allegations or suspicions of abuse must be stored in a secure place which is only accessible to those with appropriate knowledge of the suspicions/allegations. Where it is necessary for staff, students or volunteers to take photographs or video images of children or adults at risk, written consent must be obtained (from parents in the case of children) before these images are taken in order to comply with the General Data Protection Regulations.

### **Roles and Responsibilities**

Tackling exploitation, abuse and harm is everyone's responsibility and **all members of the IDS community** are expected to treat others with respect and dignity, and to operate in accordance with the code of conduct and the requirements of this policy, including how to raise concerns. This section explains specific responsibilities for certain roles.

Safeguarding is an essential duty for **charity boards**. Trustees are responsible for protecting people and safeguarding even if certain aspects of the work are delegated to staff.

Protecting people and safeguarding should be a governance priority for all charities, regardless of size, type or income, not just those working with children or groups traditionally considered at risk. It is an essential duty for trustees to take reasonable steps to safeguard beneficiaries and to protect them from abuse and mistreatment of any kind (including neglect). Trustees should also, where appropriate promote the well-being and welfare of the charity beneficiaries. Additionally, trustees must take reasonable steps to protect from harm employees, volunteers and others who come into contact with the charity through its work. A charity should be a safe and trusted environment.

Further information about the trustees duties can be found here: [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/safeguarding-and-protecting-people-for-charities-and-trustees)

The **Chair of the IDS Board of Trustees** holds ultimate responsibility for safeguarding at the charity.

**The designated lead trustee for safeguarding** supports the board in fulfilling and discharging its responsibilities for safeguarding, through the understanding of safeguarding requirements and relevant knowledge, skills and experience in this area. They facilitate Board level scrutiny, through reporting and oversight to ensure compliance with statutory duties.

The **Director of HR** is the Institute's designated safeguarding person. As such, they take overall ownership of the policy and will promote the importance of safeguarding within the Institute.

The day-to-day operation of the policy and its procedures will be the responsibility of other individuals – **The Director of Research, Cluster Leaders and anyone leading a project, activity or event** which involves children or adults at risk.

**Those leading or involved in research activities** should adhere to the highest level of research ethics in line with requirements set out by national and international regulatory bodies, and IDS's own research ethics process. They should recognise that the size, scope and content of research projects means that each project can raise its own issues when it comes to safeguarding and the implications of power dynamics within a project and take all reasonable steps to mitigate them. They should continually consider and reassess this through the project lifecycle. They should engage in equitable partnerships and avoid extractive and exploitative approaches. They should role model a positive culture in research teams and take actions to anticipate, mitigate, and address risks of exploitation, abuse and harm within research activities.

**All line managers/Cluster Leaders** are required to promote the importance of safeguarding within their team/cluster and ensure that appropriate systems are in place for:

- All their staff to become familiar with the Safeguarding Policy during their induction.
- Relevant staff to follow the Safeguarding risk assessment process.

It is the responsibility of the **member of staff leading an activity or event** which involves working with Children and Adults at risk to:

- Identify that the Children and Adults at risk Safeguarding procedure is applicable to a particular role, activity or event.
- Ensure that staff, workers, volunteers and students working with children and adults at risk are familiar with the contents of the policy and its application before any new or changed activity/event.

- Complete/update the risk assessment.
- Ensure implementation and review of the actions identified by the risk assessment.
  
- Identify whether individuals recruited or involved in an activity or event require a DBS check or basic disclosure and, where applicable, ensure that this is carried out in accordance with HR/University of Sussex (for students) procedures.
- Seek advice if needed on any of the above.

**Staff, students and volunteers** working with children and adults at risk should be familiar with this policy. Every individual who becomes aware of any suspicions or allegations regarding harm to children or adults at risk is required to report this immediately to the relevant person as set out above.

## APPENDIX 1: General guidance for working with children or adults at risk

When working with children and/or adults at risk, IDS staff and students are expected to take account of the guidance below in the way that they conduct themselves.

- Treat everyone with respect and dignity in line with the IDS Code of Conduct and model positive behaviours.
- Follow all relevant IDS policies.
- Follow the IDS research ethics process.
- Participate in relevant safeguarding awareness training.
- Consider the wellbeing and safety of participants in research, activities and other events in advance through proper planning, undertaking a risk assessment and development of safe methods of working/activities.
- Take account of the implications of power dynamics within a project, activity or event and take all reasonable steps to mitigate them.
- Engage in equitable partnerships and avoid extractive and exploitative approaches.
- Set expectations of the standards of behaviour required from participants in an activity/event and encourage them to accept responsibility for their own performance and behaviour.
- Ask participants in an activity/event to take reasonable steps to ensure their own safety and that of others, and to report any inappropriate behaviour they experience/witness or any concerns that they may have.
- Avoid showing favouritism towards particular participants.
- Provide content warnings for teaching and other events.
- Report incidents of alleged abuse and ensure that any allegations are recorded.
- Report any concerns about poor practice
- Avoid personal relationships with a child or adult at risk.
- It is not appropriate for staff to have a physically or emotionally intimate relationship with a young person under the age of 18. Particular attention is drawn to the provisions of the Sexual Offences Act 2003 which created a new criminal offence of abuse of “a position of trust”. All those who undertake work in IDS’s name must abide by the Code of Conduct, which sets out the expectations of professional behaviour.
- Staff, students and volunteers should remember that inappropriate behaviour can also occur over the telephone, email, social media or internet.
- Staff should refer to the social media policy in relation to their engagement over social media. Facebook instant chat, WhatsApp and other similar functions should not be used to interact with children or adults at risk. Wherever possible, communication should be only public pages and avoid colloquial language/abbreviations which may be misinterpreted (e.g. LOL).
- Wherever possible, work in an open environment with children where they can be seen by others.
- Avoid unnecessary physical contact.
- Avoid taking a child or adult at risk alone in a car on journeys, however short.
- Avoid taking a child or adult at risk to the toilet, unless another adult is present or another adult is aware (this may include a parent, group leader or other responsible person).
- In a situation where you are alone with a child or adult at risk, make sure that others can clearly observe you.
- Do not make suggestive or inappropriate remarks to or about a child or adult at risk, even in fun, as this could be misinterpreted.



- First aid treatment should be given with more than one adult present unless a delay would be life-threatening.
- Do not take children or adults at risk to your home.
- Maintain confidentiality about sensitive information in accordance with this policy, and the requirements of any data protection or privacy legislation in place.
- Where it is necessary for staff, students or volunteers to take photographs or video images of children or adults at risk, written consent be obtained (from parents/guardians in the case of children) before these images are taken in order to comply with the General Data Protection Regulations. Personal details and photos which clearly identify an individual must only be published where they (or their parent/guardian) has given specific agreement. Subjects should be suitably dressed in photographs (e.g. when taking place in a sporting activity).

## Appendix 2 – Links to other useful information

[UKRI-050920-PreventingHarmSafeguardingInResearchAndInnovationPolicy.pdf](#)

[170420-UKCDR-Guidance-for-Safeguarding-in-International-Development-Research.pdf](#)

[Research ethics guidance – ESRC – UKRI](#)

[Safeguarding in International Development Research: Evidence Review | UKCDR](#)

[Safeguarding Resources | UKCDR](#)

[Understanding and improving ‘fair and equitable research partnerships’ to respond to global challenges – Rethinking Research Collaborative](#)

[Safeguarding resources | Bond](#)

[Safeguarding against sexual exploitation and abuse and harassment \(SEAH\) in the aid sector - GOV.UK \(www.gov.uk\)](#)

[Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](#)

[Microsoft Word - Minimum Operating Standards \(MOS-PSEA\) \(interagencystandingcommittee.org\)](#)

[Guidelines for Investigations | CHS Alliance](#)

## Review

This policy will be regularly reviewed to ensure it remains fit for purpose.

| Issue number / Version | Date          | Changes made   | Owner       | Approved by                              | Date of next review |
|------------------------|---------------|--|-------------|--|---------------------|
| 4                      | May 2022      | Reviewed and updated with relevant terminology, understanding and guidance | HR Director | SLG June 2022<br>Requires Board approval | 2025                |
| 3                      | Nov 2019      | Reviewed and review column added   | Tina Gotts  | Jo O'Reilly                              | Nov 2021            |
| 2                      | August 2018   | Additional wording on zero tolerance                                       | HR Director | HR Director                              |                     |
| 1                      | February 2018 | First issue  | Head of HR  | Ratified by JJNC June 2018               | June 2019           |