

Safeguarding Policy
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1. Introduction

This Safeguarding Policy is a statement of intent that outlines our commitment to safeguarding all individuals who may come into contact with our organisation. It provides a framework of principles, standards, and guidelines for both individual and organisational practice, and sits within our organisational values (see Appendix A: Radar Team Values).

1.1. Scope

This policy sets out the measures that all representatives of On Our Radar Ltd. (Radar) must follow to ensure safe and ethical practice in all areas of work.

Everyone has the right to feel safe and the safeguards apply equally to all individuals irrespective of age, gender, gender identity, race, ethnicity, religion, political opinions, sexual orientation or disability. We recognise there are additional risks to children and specific safeguards are included within this policy to ensure their protection. In line with the United Nations Convention on the Rights of the Child, a child is anyone under the age of 18 years.

These measures set out in this policy must be applied at all times by: Radar Staff, Freelance Consultants, Board Members, Volunteers and Partner Organisations. All of these groups will be made aware of Radar's Safeguarding Policy as part of their induction or project initiation.

Organisational partners are expected to comply with their own organisational policies and procedures.

2. Responsibility for Safeguarding

Safeguarding is everyone's responsibility. It is essential that Radar Staff, Freelance Consultants, Board Members, Volunteers and Partner Organisations are aware of their responsibilities and have access to advice to help them integrate safeguarding into their role.

To achieve this, Radar will:

- Inform other stakeholders of our Safeguarding Policy, including publishing our policy on our website.
- Integrate safeguarding in relevant contracts for signature.
- Require new core team members, consultants, volunteers and Board members to read and sign the Radar Safeguarding Policy on joining the organisation.
- Discuss safeguarding and how it applies to different roles as part of the on-boarding process.
- Ensure access to advice from Radar's Managing Director and Head of Operations who are responsible for overseeing the implementation of this policy.
- Provide refresher training on safeguarding at least every two years.

Any serious or repeated breach of this policy will result in disciplinary action up to and including termination of contract or employment.

We expect those who work with us to actively support our efforts to keep people safe

whilst creating and complying with their own institutional safeguarding policies. This includes all Employees, Freelance Consultants, Volunteers and Board members

3. Reporting and Response Procedures

Our ability to keep people safe depends on creating a culture where everyone feels empowered and supported to raise questions and concerns. You should speak to the Managing Director or Head of Operations if:

- You have any concerns about your safety or well-being.
- You have any concerns about the safety or well-being of those you are working with.
- You need advice about ensuring the safety of others in your work.
- You have any concerns about any violations of this Safeguarding Policy.

They will listen to your concerns and decide next steps. Every concern or question is valid, no matter how small, and will help us ensure the safety of everyone connected with our work.

3.1. Reporting Concerns

If you observe or suspect any form of harm, abuse or exploitation (See Appendix B for definitions of harm) or this is reported to you, you must:

- Listen and provide reassurance to the individual.
- If the threat is immediate, take action to ensure the individual's safety, as long as this does not put you or others at additional risk of harm. This should be done in consultation with the Managing Director / Head of Operations and the lead contact at the Partner Organisation.
- Do not investigate or try to address the concerns yourself as this may place you and others at risk of harm.
- Never agree to keep secrets. It is important that you report concerns to Radar's Managing Director or Head of Operations so Radar can take action to address the concerns and provide you with support.

Radar Managing Director on date of publication: Clare Kiely (e-mail: clare@onourradar.org)

Radar Head of Operations on date of publication: Jill Vaizey (e-mail: jillian@onourradar.org)

If the concerns relate to Radar's Managing Director or Head of Operations, you should report the concern to Radar's Advisory Board Chair, Laura Jump, who will determine what further action is required.

Advisory Board Chair on date of publication: Laura Jump (e-mail: laura.e.jump@gmail.com)

You may also have an individual responsibility under local law to report your concerns to the relevant authorities. Radar will help identify if there is a local reporting requirement and provide you with support where reporting is required. This reporting procedure should be followed for all safeguarding concerns. Radar will ensure that all concerns are taken seriously, and appropriate action taken in line with the response procedures outlined below.

3.2. **Radar's response to allegations against Radar's core team or consultants**

All reports of abuse and exploitation will be reported to the Managing Director (i.e. Clare Kiely in October 2022) / Head of Operations (i.e. Jill Vaizey in October 2022). If concerns raised relate to The Managing Director or Head of Operations they should be reported to the Board Chair (i.e. Laura Jump in October 2022). Radar will activate its [Crisis Management Process](#).

Where appropriate, additional advice may be sought from an external Legal Counsel. Together they will decide what action is required.

This will include, but is not limited to:

- Ensuring that appropriate support is provided to the person affected and that all possible steps are taken to ensure their safety and welfare.
- Providing support to any witnesses or others who may have been affected.
- Ensuring that all actions are consistent with local laws, including mandatory reporting legislation.
- Ensuring that any criminal matters are reported to the police and/or authorities.
- Liaising fully with investigations by statutory agencies or, where appropriate, initiating an internal investigation.

Depending on the nature of the concern, Radar reserves the right to suspend the individual whilst the investigation is conducted. At a minimum, Radar will ensure that the accused individual is not allowed contact with children until the investigation is concluded. This is not an assumption of guilt but is necessary to protect everyone involved. The Chair of the Board will be informed of any concerns involving the core team or consultants to help ensure all relevant actions are taken in line with best practice.

Radar will maintain a record of all actions taken and this will be held confidentially with access restricted to Radar's Managing Director and Head of Operations.

3.3. **Radar's response to allegations against a Partner organisation**

If someone at Radar becomes aware of a child safeguarding issue at a partner organisation, Radar will inform a nominated member of staff within the partner organisation of the concern.

Radar will encourage the partner organisation to:

- Provide appropriate support to the individuals affected by the alleged harm.

- Take steps to address the concerns in line with their own policies and procedures and in compliance with local laws, including any mandatory reporting requirements.
- Liaise with investigations by statutory agencies or, where appropriate, initiate an internal investigation.

The partner organisation will be asked to provide Radar with a confidential and anonymised update regarding the steps taken and outcome of the safeguarding concerns.

- Radar has no authority to direct the investigation or its outcome.
- Radar will adhere to its mandated reporting obligations under all the laws of the local jurisdiction and will report to child protection/safeguarding authorities or law enforcement as the law requires.

Radar's Managing Director / Head of Operations will document the incident and save it confidentially under the partner's file in our records. All records will be retained in line with Radar's standard document retention policy and retained for 7 years after the grant term ends.

3.4. **Whistleblowing**

If you are concerned that the organisation has failed to take action or have wider concerns about the management of safeguarding issues within Radar, you can raise these concerns via the Radar [Whistleblowing Policy](#).

Concerns should be directed to the Chair of the Board.

4. Accountability and Oversight

To ensure accountability for our response to safeguarding concerns and encourage reflection and learning, the Managing Director and Head of Operations will prepare an annual anonymised report of all safeguarding concerns reported to Radar and share this with the Board. The report will be discussed internally to identify any learning which can inform improvements in safeguarding within the organisation.

5. Code of Conduct

Radar's [Code of Conduct](#) helps to promote a safe working environment and ensure the safety and well-being of the children and communities with whom we come into contact. Compliance with Radar's Code of Conduct is mandatory. Serious or repeated violations of this code may be subject to disciplinary action in line with Radar's [Disciplinary Policy and Procedure](#).

5.1. **Professional conduct**

- I will uphold the integrity and reputation of On Our Radar by ensuring that my professional conduct is consistent with Radar's mission and values.

- I recognise that my conduct outside of work has the potential to damage the reputation of Radar.
- I will treat all people with dignity and respect. I will not engage in or condone any form of discriminatory behaviour or the verbal, sexual or physical harassment of others.
- I will prioritise the safety and well-being of others and will not engage in or condone any verbal or physical conduct which is threatening, intimidating or could humiliate others.
- All public speaking and media engagement, where I'm representing Radar, must reflect Radar's values and respect the rights of children and communities.

5.2. **Partner Visits**

- I recognise the privileged position Radar holds in relation to the partners and communities we work with, and will behave in a manner that upholds the trust and reputation of Radar.
- I will only visit partners within the boundaries of contracted work, with the approval of Radar and with the prior knowledge and approval of the partner organisation.
- I will be sensitive to local customs and will follow any instructions or additional safeguarding measures indicated by the partner.
- I will only take photographs if written, informed consent has been obtained and with the prior approval of partner staff (see "6. Media & Communications" below).
- Photographs may be taken on personal devices may only be used for the purpose of the project and must be uploaded to the Radar shared drive with consent and then deleted from the personal device within 4 weeks.
- I will not be under the influence of alcohol or drugs during partner visits.
- I will not give gifts to individual staff or community members. Where accepting gifts is normal cultural practice, the gifts should be of nominal value and I will inform Radar's Managing Director in advance or immediately thereafter.
- I will not exchange money, offers of employment, employment, goods or services for sex or sexual favours.

5.3. **Interactions with Children**

- I will uphold children's rights in all my interactions, treating all children with dignity and respect.
- In particular, I will avoid using language or behaving in any way which could shame, humiliate, belittle, or degrade a child.
- I will maintain professional boundaries at all times. This includes not sharing personal details about my life or connecting with children on social media.
- I will ensure that another adult is present when interacting with children, whether in person or virtually.

- All electronic communication with children must be via agreed official channels with partners
- I will respect a child's right to not be touched.
I will not engage in any:
 - full body or face-to-face hugs,
 - tickling, horseplay, or roughhousing,
 - sitting in my lap,
 - picking up or carrying (except in an emergency)
- I will not engage in any form of behaviour which could make a child feel uncomfortable or which could be interpreted as inappropriate.
- I will not engage in any sexual activity or romantic relationship with children (anyone under the age of 18, or 21 if that is the age of majority under the applicable law), regardless of whether the age of majority or age of consent locally is lower than 18. I accept that mistaken belief regarding the age of a child is not a defence.
- Use of computers, mobile phones, video/digital cameras or other electronic devices to access, create or distribute inappropriate images of children is strictly prohibited.

6. Accountability

- I will ensure my own professional conduct is consistent with this Code and will encourage others to do the same.
- I will challenge unacceptable behaviour or if I feel unable to do so directly, I will inform the Managing Director or Head of Operations and ask for their advice.
- I will notify the Managing Director or Head of Operations of any serious breaches of this Code.
- If I have any concerns that a child or other individual connected with our work is at risk or suffering harm or abuse, I will report this immediately to the Managing Director or the Head of Operations and will fulfil any individual reporting requirements required by local law.

7. Project Initiation with Partner Organisations

Radar works in partnership with a range of partner organisations around the world, many of whom work with and have direct contact with children, young people and adults with additional vulnerabilities.

As part of the project initiation process, Radar will discuss with the partner the potential safeguarding risks inherent in the proposed work. We will explore the safeguarding measures the organisation already has in place, actions to mitigate identified risks and agree named contacts for reporting concerns. Radar are not experts in safeguarding and take a context specific approach working closely with partners to understand the nature of their work and where safeguarding issues may be present or arise. Radar does not hold direct relationships with children or vulnerable adults outside the parameters of the contracted work and expects Partners to hold and lead safeguarding at the project level in line with their Safeguarding policy and practice. Radar will offer the use of our

[intersectionality matrix](#) as part of the project initiation process to support the work of the partner.

Where Radar becomes aware of serious safeguarding issues within a partner organisation which raises concern about their ability to deliver work safely, Radar will inform the partners named contact immediately. Steps will be taken to assess the level of risk and ensure that appropriate action is taken to address the concerns.

8. Safe Spaces and Participation

Where Radar and Partner organisations invite children, young people or adults with additional vulnerabilities to participate in our activities, we aim to ensure the following principles are met:

- **Safe Spaces:** Participation takes place in a safe space which protects the physical & emotional wellbeing of participants and minimises the risk of harm.
- **Inclusive Voices:** Participants are provided with clear information about their role and supported to make an active contribution to issues that are relevant to them.
- **Positive Influence:** Participation will be founded on a commitment to listen and act on the ideas shared by participants and feedback will be provided about the impact of their involvement.

Whenever we convene meetings, in person or on digital platforms, we will put in place measures to safeguard the emotional and physical well-being of all participants.

This will include:

- Discussing and assessing the potential risks to participants in advance with Partner organisations so that relevant and specific safeguards can be put in place. If appropriate, Radar will use our [intersectionality matrix](#) as part of the project initiation process to support the work of the partner.
- Ensuring that the team member or consultant facilitating the space have suitable skills and experience and have access to additional support and training where required.
- Ensuring that the team member or consultant facilitating the space knows their responsibilities to report concerns and the procedure that must be followed.
- Providing clear information about the purpose of the meeting, the boundaries of confidentiality and how information will be used so that participants can make an informed decision about their participation.
- Clearly setting out expectations around conduct and safety to all participants at the start of the meeting and reinforcing the importance of maintaining a safe space.
- If participants are sharing experience of violence and trauma, we will ask that Partner Organisations provide additional support before, during and after the meeting.
- Ensuring there is a simple, accessible channel for participants to raise concerns and a named contact for sharing these.
- Ensuring we have written, informed consent for any recording, photography or use of personal testimonies which may be shared.

9. Media and Communications

Radar may, from time to time, use images or testimonies to illustrate the importance and impact of our work. We will endeavour to ensure these uphold the rights and dignity of the individual and that their safety and well-being is a paramount consideration. The organisation will follow the guidelines set out in Radar's [Social Media Policy](#).

10. Informed Consent

Consent means offering individuals real choice and control about the information they share and how this may be used.

- In clear and simple language, Radar will explain who we are, the scope of the project, why we want the information and what we will do with it.
- We will ensure that individuals understand the consent process and know they can refuse to participate at any point and won't be penalised for doing so.
- Individuals will be informed that they can talk to the Radar team about withdrawing their consent at any time and will be made aware of how to do so.
- Working with partner organisations, Radar will obtain and securely store copies of signed consent for use of all images and testimonies using media release forms.
- Working with partner organisations, Radar will provide a covering letter which clearly explains why the partnership is requesting the use of images or testimonies and how these will be used.
- For children under the age of 18, Radar and partner organisations will also obtain signed consent from a parent or guardian.
- We recognise that consent for using images and testimonies is not indefinite. If we are asked to stop use of images and testimonies by a contributor, we will do our best to accommodate the request based on current circumstances.
- We will not use stock images to illustrate our work as it is not possible to confirm appropriate levels of consent for the use of these images.

11. Right to Protection

Radar will discuss potential risks (e.g. risk from perpetrators of violence, risk of stigma or shame, risk of retraumatization) with anyone who agrees to share their image or personal testimony. Radar will take all necessary measures to address any risks that are identified.

When sharing stories about survivors of social injustice, discrimination, violence and abuse we may choose to change contributor's names, disguise their voice and/or avoid showing their face. These decisions will be taken in collaboration with the individual and will take into account their views and wishes.

- Where the survivor is a child, decisions will be taken in collaboration with the child and their parent or guardian.
- We recognise that sharing stories of social injustice, discrimination, violence and abuse may cause distress for those sharing their experiences. We will work with Partner Organisations to ensure that appropriate support is in place.

12. Right to Privacy

- We will decide with an individual how they wish to be identified and will restrict location information to the city or region where the individual lives. Care will be taken to avoid including indirect identifiers (e.g. street names, landmarks) in any images we use.
- At the time of obtaining consent, we will explain that if images/testimonies are shared on the internet, we will not be able to control who sees or has access to the images or shared content in the future.
- We will comply with all relevant data protection legislation. All images and stories will be held securely and access to this information will be strictly limited.
- We will be mindful of the way children's images are used and represented, discuss this representation with contributors, their families and partners and may choose to not show children's faces at all.

13. Safe Recruitment

Radar aims to recruit core team members and consultants who share our values and commitment to safeguarding children and vulnerable adults, as well as bringing knowledge and skills that help us achieve our strategic objectives. Recruitment for any role which includes contact with children or other vulnerable groups or the handling of personal data, will be subject to:

- A formal interview, including consideration of the candidate's attitudes and values;
- At least two professional references and a review of the individual's social media activity and profile; and
- A contractual obligation to comply with Radar's Safeguarding Policy.
- Radar does not routinely conduct criminal background checks on all staff, however, where staff, consultants or volunteers will be in contact with children or other vulnerable groups we will undertake DBS checks.
- All core team members, consultants, volunteers and Board members must comply with our Code of Conduct.

14. Governance and Accountability

To ensure the effective implementation of safeguarding, additional responsibilities and accountability structures have been agreed at different levels of the organisation.

Clare Kiely will act as Radar's Safeguarding Lead. She will:

- Provide support and advice to colleagues on how to integrate safeguarding into their daily work.
- Ensure that safeguarding is included in the orientation for new members of the core team, consultants and Advisory Board.
- Ensure that Radar's Safeguarding Policy is reviewed 1 year after initial implementation and then subsequently every 2 years.
- Arrange refresher training for Radar's core team, consultants and Advisory Board members after every policy review, at least every 2 years.

- Listen to any concerns about safeguarding and support the team in taking appropriate action, including escalating concerns to partner organisations and the Board.

The Safeguarding Lead, Clare Kiely, will:

- Promote a safe and open culture in which the rights of children and others associated with our work are protected.
- Ensure Radar's Safeguarding Policy is implemented and that all core team, consultants and Board members are aware of their responsibilities.
- Listen to any concerns about safeguarding and ensuring all concerns are taken seriously and appropriate action is taken.
- Immediately escalate any safeguarding concerns related to Ignite core staff, consultants, or operations to the Board Chair.
- Inform the Board Chair of any safeguarding concerns witnessed by Radar core staff, consultants, volunteers of Board members or disclosed to Radar team members by an alleged victim, in order that Radar and Partner Organisations can help ensure appropriate support is available.
- Provide an update on safeguarding to the Board on at least an annual basis.

Radar's Board will:

- Be a source of advice and support on best practice in safeguarding where required.
- Ensure that safeguarding is considered as an integral part of the work of Radar.
- Be informed of serious safeguarding concerns and help ensure all relevant action is in line with best practice.
- Receive an annual anonymised report of all safeguarding concerns reported to Radar.

Reviewer: Jillian Vaizey
Position: Head of Operations
Date Reviewed: 19 October 2022

Appendix A: Radar Team Shared Values

We believe that creating a space to be human beings together, acknowledging and balancing our collective strengths and weaknesses, is a prerequisite for an organisation that truly embodies its declared values. At Radar, we've created such a space. Our values underpin everything we do, always. They improve the quality of our work and are pivotal to our decision-making processes.

Our Shared Values

- **Friendship:** We are friends, and we believe our friendships are invaluable to our business. We know each other's strengths and weaknesses, we treat each other with kindness and respect and we know this drives efficiency not found in larger, looser-knit organisations.
- **Transparency and honesty:** We are always transparent and honest with each other. Our voices are considered equal, they are all respected and they are all heard.
- **Kindness:** Our culture isn't for show. It is how we cultivate our business growth. People trust us and know that we are genuinely bright, caring, kind people. They know we will always do the right thing, and that is an appealing attribute in a partner organisation.
- **Trustworthiness:** Trust, not fear, is the norm in our team. Everyone is given the benefit of the doubt as we all believe one another's motivations are thoughtful and sincere.
- **Patience:** We are all human, and we don't hold one another to superhuman, unrealistic expectations. We have a shared willingness to accept that we all make mistakes, and a desire to strive to improve.
- **Passion for excellent work:** We aren't afraid to experiment with bold ideas. We work incredibly hard, and still, we know that sometimes things don't go to plan. We like to push the envelope and we strive always to deliver our best possible work to every partner.
- **Respect:** We often have to strike a careful balance between innovation and pragmatism. We know everyone on our team thinks in different ways, engages in different ways and solves problems in different ways. We are respectful to one another when walking this tightrope. We hear one another out, always listening to alternative ideas and taking those views and feelings on board.
- **Freedom:** We foster an environment where freedom can exist and flourish. We know our team can manage their time and productivity, and we all do our best to support other people's ways of working.
- **Collaboration:** We all want to work in an enjoyable environment, as such, we make a point to spend time talking, brainstorming, laughing, and challenging one another. We take time to go for walks together, have lunch together or get drinks together during the week.

- **Encouragement and understanding:** We encourage team members to explore and grow within other areas of the company, but we also know that we need balance in our lives. We understand that it is impossible to be at your best all the time, and we support one another's need for rest and recuperation.

Appendix B: Definitions of Harm and Abuse

Radar operates in many countries across the world, and definitions of abuse vary between contexts. This appendix provides broad definitions as a guide to the types of harm and abuse that Radar staff and representatives should be alert to.

This list is not exhaustive and any concerns about the safety or welfare of anyone connected with our work, no matter how minor, should be reported to the Safeguarding Focal Point or Director.

Children and young people

Physical Abuse: Actual or attempted physical injury of a child, inflicted intentionally or knowingly not prevented. This includes, but is not restricted to, punching, slapping, biting, burning, strangling, poisoning, drowning and smothering.

Sexual Abuse: The involvement of a child in sexual activity that he or she does not fully comprehend, or for which the child is not developmentally prepared for and is unable to give informed consent to. This includes direct sexual contact through kissing, touching and penetration as well as encouraging children to witness pornography or intercourse.

Emotional Abuse: The persistent failure to provide for the child's basic emotional needs to such a severe extent that it is harmful to the emotional development of the child. This includes repeatedly ignoring or rejecting a child, causing the child to feel frightened and in danger, isolating the child from social contact and degrading and humiliating treatment.

Neglect: The persistent failure to provide for the child's essential needs, where there is the means to do so, to the extent that impairment to the child's physical health and development is likely. This includes the failure to provide appropriate clothing, food or shelter; failure to access appropriate medical care or treatment.

Exploitation: The physical, mental or emotional abuse or neglect of a child for financial or other benefit. This includes commercial sexual exploitation, child trafficking and child labour.

Adults

Sexual Harassment: Unwelcome or offensive sexual or romantic advances, requests for sexual favours, or other verbal, non-verbal or physical conduct of a sexual nature which makes the individual feel intimidated, humiliated or otherwise feel threatened. This may include, but is not limited to, unwanted physical contact, sexual comments, sexually explicit gestures or messages, unwanted propositions or invitations for physical intimacy.

Bullying and Harassment: Verbal or physical conduct designed to threaten, intimidate, denigrate or offend individuals. This may include, but is not limited to, ridicule, belittling, insults, offensive remarks and use of negative stereotypes.

Exploitation: the deliberate maltreatment, manipulation or abuse of power and control over another person for personal, monetary, social or political gain. This includes sexual exploitation and the offer or promise of monetary, social, other benefits as an incentive or form of coercion for sexual or sexualised purposes. This includes all forms slavery, forced labour, domestic violence or human trafficking.