

Annual Safeguarding Report

1 January - 31 December 2023

Purpose of the Report

The purpose of the annual Safeguarding report

- Board (of Trustees) ensure the periodically review the Safeguarding framework;
- demonstrate publically the importance of transparency in relation to a culture of integrity and trust; and
- provide guidance on the different components of TI-UK's safeguarding framework.

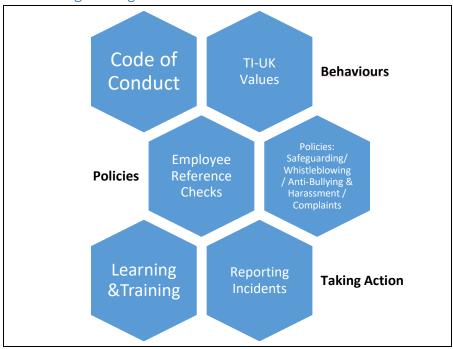


We will act with integrity.

We will value and respect differences.

We will work collaboratively across Transparency International, our global Movement and with partners. We will have the courage to demand better of ourselves and others.

TI-UK Safeguarding Framework







Board

The Board of Trustees of TI-UK recognise that they have collective responsibility to ensure that the charity is accountable to beneficiaries, funders and the wider public in relation to Safeguarding.

Board members are all required to sign the TI-UK Code of Conduct on their appointment. They are also provided with induction into matters related to Safeguarding.

The Board have outlined their commitment to Integrity and Accountability in relation to Safeguarding and this is emphasised in the formal induction process undertaken for all our people.

We as a Board take collective responsibility to ensure that policies and procedures are in place to uphold high standards of integrity and accountability, to create an environment that reflects the core values and guiding principles of the TI Movement and to promote such standards and principles.

But we recognise that from time to time, things at work may go wrong. Whether it is Safeguarding, Bullying and Harassment, Racism, Fraud, Bribery, Corruption or other matters that require Whistleblowing. We assure you that we shall act on your concerns.

We recognise that negative and unethical behaviour can be undertaken by colleagues, consultants, Board members or project partners. Our policies outline the reporting channels to utilise for the different type of issues and these include line managers, The People Team or our Safeguarding Officer (COO).

In the event that these routes are not appropriate or that they have proved not to be effective then the policies indicate how and when these should be channelled through the Chair of the Board (Mike.Millward@transparency.org.uk) who may choose to refer it to the Ethics Advisory Panel of TI-UK. The panel Chair, David Nussbaum can be contacted via ethics@transparency.org.uk.

By ALL of us working together to uphold high standards of behaviour we can ensure we have a workplace built on trust and respect which are vital elements to deliver our strategy and mission.

The TI-UK 2024/2025 Risk Register includes Safeguarding as part of the overall risk register. This ensures that the risks are monitored on a regular basis by the Senior Leadership Team and the Finance, Risk & Audit Committee. In June 2023 a Gender/ Safeguarding expert reviewed our systems and approaches making various recommendations to policies and guidance that we incorporated.

Delegation

Day to day delegation for Safeguarding at TI-UK is within the role responsibilities of the Chief Operating Officer, Colin Munro. The COO has direct line management reporting to the Chief Executive. They also have direct access to the Chair of the Board. There are documented procedures in place to ensure that matters related to Safeguarding are reported in a timely manner to the Charity Commission and donors through Serious Incident Reports.

Risk Assessment

The Safeguarding Policy (*updated November 2023*) outlines the risk based approach taken. Assessment is made of how likely it is that a safeguarding matter could arise in programmes with the aim to put in place mitigation measures to reduce this risk.



TI-UK recognises that power imbalances exist in society and need to be considered in identifying areas of risk as well as designing systems and processes to address incidents. We have identified four specific areas of higher risk:

- culture of bullying, sexual harassment and other forms of sexual misconduct in the Houses
 of Parliament. This recognises that colleagues involved in advocacy work with politicians,
 researchers, aides etc. may experience significant power in-balances that allow for
 inappropriate behaviour to occur.
- employees and consultants travelling overseas who may not act in accordance with our core values and guiding principles in their on or off-duty time.
- our third-party relationships overseas principally other TI chapters and occasionally other NGOs to whom we make transfers of funds or grants.
- TI national chapters with legal advisory centres or similar functions that are funded by TI-UK and may come into contact with children or adults at risk.

TI-UK has very limited direct contact with vulnerable adults and children in the course of its work (in the narrowest of Safeguarding definitions). But this is not grounds for complacency. Our updated policy highlights the spectrum of physical, mental and societal aspects to be aware of in assessing contact with vulnerable adults.

Whilst overseas travel is lower than pre-pandemic power dynamics at conferences and working on advocacy across of range of cultures was highlighted by our colleagues as an area that required specific guidance. This was published in November 2023 to ensure that colleagues feel they can report unacceptable incidents/ behaviour and those that may need to support and investigate them are aware of good practice. Our policies also recognise that safeguarding issues can occur in virtual working situations.

In reviewing work with Chapters, the Defence and Security programme have undertaken gender training to help bolster capacity awareness and willingness to act on safeguarding matters.

A key focus this year has been exploring barriers to reporting incidents and our October 2023 away-day explored this with various recommendations that were then reflected in our updated policies and procedures.

Speaking Up: Matters Reported

Type of Report by Potential Wrongdoer	Employee	Partner	Volunteer	Contractor	2023 Total	2022 Total	2021 Total	2020 Total	2019 Total	2018 Total
Sexual Abuse	-	-	-	-	-	-	-	-	-	-
Exploitation	-	-	-	-	-	-	-	-	-	-
Sexual Harassment	-	-	-	-	-	-	-	-	1	-
Conflicts of Interest	-	-	-	-	-	-	-	-	-	-
Code of Conduct	-	-	-	-	-	-	-	-	-	-



Bullying & Harassment	3	-	-	-	3	1	-	1	-	4
Other	-	-	-	-	-	1	-	-	-	-
Total	3	0	0	0	3	2	0	1	1	4

Reports Investigated

With low historic levels of reported wrong-doing various ways of promoting a Speak Up culture have taken place over the last two-three years. Not all those reporting matters wish to then utilise formal grievance policies. At times matters are resolved through informal routes. It is recognised that raising concerns or complaints is not an easy decision but colleagues who do so are assured of support and guidance as outcomes are reached.

In 2023 we concluded two earlier reports related to potential wrongdoing involving bullying behaviour and the other in relation to safety and security matters. Both of these took longer to resolve than in our normal three month period, partially due to them involving external partners. For those involved the length of the period to resolve these did add to the overall lack of sense of satisfaction. To help address this we have put in place external support that can be drawn upon to externally handle investigations and fact finding in the future as well as assist with mediation processes where deemed appropriate. We received three employee related concerns in relation to allegations of bullying and / or harassment which were the taken forward in line with our policies and guided by the outcome those raising them requested. We also continue to ensure that risk of retaliation is considered as we know this can also be a barrier to reporting. An independent review to help learn lessons from mediation was undertaken and we will be implementing those recommendations in 2024.

Charity Commission Serious Incident Reports

No Serious Incident Reports in relation to Safeguarding were made in 2023 (2022: zero) to the Charity Commission.

Progress against 2023 Priorities

We set out key areas identified for focus in 2023 and are pleased to report progress against each of these:

Focus area	Progress in last 12 months
Continuing engagement with colleagues to ensure our culture of integrity and trust is promoted and understood. This will include Listen into Action survey results and induction/refresher training on safeguarding, whistleblowing and anti-bullying and harassment.	We undertook surveys in June and November 2023 to monitor level of confidence (see section below). All new colleagues undertake safeguarding training as part of their in-person induction. The October 2023 in-person away day included sessions on gender in the workplace and barriers to raising safeguarding concerns. We also reviewed our values and behaviours guidance and have developed a framework for 2024.
	National Whistleblowing Day was celebrated in June 2023. Colleagues who attended the Transparency School (June 2023) reported back on inspiring learnings and these included the lived experience of whistleblowers. We have followed with solidarity the legal and policy developments one of our colleagues is



Programme design and delivery learning in relation to gender with insights from the Defence and Security helping inform discussions on future planning across different TI-UK programmes.	seeking to challenge in relation to whistleblowing in the civil service. We enhanced our anti-bullying and harassment and safeguarding policies. We developed guidance for reporting incidents at external events. A gender consultant working on human security within the Defence and Security programme has worked with both TI-UK, Chapters and the Australian Chapter hosted International Mining programme. Monthly learning sessions have continued to be conducted to help share experiences and develop capacity.
Continued engagement with the sector on developments including BOND and the Charity Speak Up Network.	We continue as a BOND member to utilise their expertise in this area. We continued to participate in the charity sector network promoting a Speaking Up culture. Colleagues participated in the 30 th anniversary conference of Protect- the Future of Whistleblowing (October 2023)

Listen into Action Results

As part of our regular employee surveys we ask specific questions to help us understand how our current culture supports integrity and trust with specific thoughts around Safeguarding, Bullying and Harassment and Whistleblowing. For these questions we also used gender data to identify trends or aspects we need to consider.

	November 2023 23 responses		June 2023 26 responses		November 2022 26 responses	
Results	Yes	No/Not sure/Too early to say	Yes	No/Not sure/Too early to say	Yes	No/Not sure/Too early to say
I know where to access information on rumours and allegations related to safeguarding, bullying and harassment and whistleblowing?	91%	9%	92%	8%	88%	12%
I feel confident to act on rumours and allegations related to safeguarding, bullying and harassment and whistleblowing?	65%	35%	77%	23%	62%	38%
Are you confident that management will act on allegations of safeguarding	83%	17%	77%	23%	81%	19%
Are you confident that management will act on allegations of bullying and harassment	78%	22%	81%	19%	73%	27%
Confidence that wouldn't experience negative treatment from TI-UK if raised a complaint	87%	13%	85%	15%	85%	15%

Colleagues report high levels of awareness in relation to accessing information with confidence that management will then act and that they won't experience negative treatment. Our team discussions on the barriers to reporting identified concerns highlighted the broader societal aspects of power and gender that can leave people aware but not confident to act. Recognising these, ensuring those who



may receive reports are trained, receptive and non-judgemental are critical to creating such an environment and will remain areas of focus.

Sector Engagement

TI-UK recognises that engagement with the sector is a vital element to promote confidence that safeguarding remains a priority. It also wishes to ensure it can learn and develop using the evidence from organisations that operate in a larger scale and with higher levels of resources to dedicate to this area.

As a sector the challenges have been outlined with a recognition that these will take concerted efforts over many years to address fully:

Context is key: NGOs highlighted the importance of ensuring safeguarding standards, such as the Core Humanitarian Standard or Keeping Children Safe, are translated into policies that can be easily implemented in any context. It's also imperative to design proportionate processes and practices for organisations of different sizes.

People report to those they trust: Building relationships and trust is essential, so organisations must understand any barriers to reporting and why people might not report concerns. It's crucial to acknowledge that whistleblowers can often be the voice of the victim or survivor. Failing to listen to or protect whistleblowers is silencing their voice.

Power and privilege matter: Sexual exploitation, abuse and harassment are fundamentally about gender inequality and power imbalances. As a sector, there is a need to understand our own power and privilege. We must call out power dynamics that exist within our organisations and programmes. We must demonstrate a long-term commitment to address deep-rooted inequalities based on gender, race, age, sexuality and disability, and how vulnerabilities intersect.

Safeguarding is everyone's responsibility and culture shift takes time: We know shared codes of conduct and standards of practice already exist, but these tend to be driven by policies and procedures. We must address the norms, values, attitudes and behaviours that may shape how those policies and procedures are implemented

Commitment to get safeguarding right: progress in many different areas, including better systems, updated policies, more training, and increased oversight and involvement of CEOs, senior leaders and trustees in safeguarding work.

2024 Priorities

In 2024 our priorities will include:

- Continuing engagement with colleagues to ensure our culture of integrity and trust is promoted and understood. This will include Listen into Action survey results and induction/refresher training on safeguarding, whistleblowing and anti-bullying and harassment. We shall also at the Board level people have access to female and male colleagues nominated for safeguarding roles.
- Ensuring programme design and delivery learning in relation to gender with insights from the Defence and Security continue to inform discussions on future planning across different TI-UK programmes.



 Continued engagement with the sector on developments including BOND and the Charity Speak Up Network.



Summary of Safeguarding Framework Components

Component	Key aspects
Code of Conduct	The Code of Conduct is available for different types of engagement with TI-UK: employees, consultants, interns, Board members and ordinary members. Copies are available on the TI-UK web-site within the Policies and Procedures document (https://www.transparency.org.uk/governance-0/Policies%20and%20Procedures)
Movement's Strategic commitment to values of transparency, integrity and accountability. TI-UK's commitment to act with integrity, value and respect differences, work collaboratively & the courage to demand better of ourselves and others	The TI-UK Strategic Plan (2021-2030) outlined the movement's commitment to safeguarding: "Across the Transparency International Movement we are striving for the highest standards of transparency, integrity and accountability. These values and behaviour are promoted and recognised across our organisation. We will do all we can to ensure equality of opportunity and to prevent any kind of discrimination on the basis of race, gender or religion. We will continue to safeguard all colleagues and stakeholders through our systems for reporting and resolving issues, as well as ensuring we have a culture where people have the confidence to speak-up." TI-UK have developed four key values of which acting with integrity and respecting differences are vital to our strategic success.
People Team priorities	The People Team priorities are centred on ensuring that a high trust culture is in place that will not only support our colleagues to perform at their best, but also ensure the environment allows them to focus on delivering our strategic mission. In line with that, resources are focused on ensuring that we have a Speak Up where colleagues have the tools to promote whistleblowing, safeguarding and anti-bullying.
Pre-Employment Reference Checks	Whilst many employers are only willing to provide limited factual standard references, requests are made to confirm that the candidate is not subject to an on-going safeguarding investigation/ or left before such an investigation concluded.
Policies: Safeguarding Whistleblowing	The safeguarding policy, whistleblowing and anti-bullying and harassment policies are available on the shared drive, the internal HR system, Iris, and on the TI-UK web-site.
Anti-Bullying & HarassmentComplaints	The Complaints Policy and Procedure allows external parties the opportunity to raise concerns and have these investigated. The policy is available on the main web-site. The Whistleblowing Policy also outlines how complaints may be handled.
	A standard email address for reporting matters is in place (reportingconcerns@transparency.org.uk) with these being received by the COO who is also the Safeguarding Officer.



Component	Key aspects
Learning & Training	Induction training is available for all new starters. The sessions set out the Board commitment, Safeguarding Framework, policy and procedure and scenarios to encourage discussion and debate. Feedback is received after these sessions to ensure that the approach to training remains relevant and timely. Refresher training is provided at least annually.
Reporting Incidents	The Chief Executive's report to each Board meeting includes a formal confirmation as to the number of safeguarding incidents reported. The Board action list that is updated after each Board meeting and is available for all employees to view on the Shared drive also has details published. A written procedure is in place to provide guidance as to how to report Serious Incidents to the Charity Commission. A standard report is in place for raising complaints related to safeguarding. This highlights that rumours as well as actual complaints can be registered. The report also ensures that the next steps are logged and details of any investigation required is outlined. A glossary of terms is in place to help ensure we promote a culture that utilises sector wide terminology.



Safeguarding Report

This form allows safeguarding incidents to be reported to TI-UK. It could apply to an incident involving employees, volunteers, consultants, Board members or others associated with our work. These can be completed by the Safeguarding Officer, the People team, a complaint or a witness to an incident. In completing the form reference should be made to the most recent Policy on Safeguarding, Anti-Bullying and Harassment and Whistleblowing where examples and description of next steps are outlined.

Reports can reach you through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If you hear something in an informal discussion or chat that you think is a safeguarding concern, then you should report this. If someone is unsure if they wish to make a complaint then the People team can provide guidance allowing the report to also be made on their behalf. The wishes of the complaint must always be respected and a discussion can be undertaken with full confidentiality being requested.

If a safeguarding concern has been disclosed to you, it is helpful to bear the following in mind:

- Listen
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation
- Report to the appropriate colleague (line manager and / or Safeguarding Officer (COO)

This form can be used to register what could be considered as minor complaints. There may be a pattern to behaviour and so ensuring that even minor complaints are logged and confidentially registered is important. Sometimes discussing the matter is the highest priority and completing the form can take place after this has occurred and a complainant / witness is clearer on what will take place next and importantly who will be made aware of the matter.

Confidentiality: Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.

Please try to complete and send the following information within **24 hours** of you being alerted to the concern. Please email to reportingconcerns@transparency.org.uk

	Response
Name of person making report	
Name(s) of alleged survivor(s)/ victim (s) of safeguarding incident(s) if different from above	
Name(s) of alleged wrongdoer (s)	
Description of incident(s)	



Delegated Constant and Leading to Constant	
Dates(s), times(s) and location(s) of incident	

Section 2: To be completed by the Line Manager/ Safeguarding Officer / People team etc

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Has the survivor (victim) expressed a wish for this matter be considered by someone of the same gender? It is critical that the needs of the survivor (victim) are prioritised from the start of the investigation process. The People team can provide guidance in this aspect.	Yes/ No / Not yet clear
Does the reported incident(s) represent a breach of safeguarding	Yes/ No / Not yet clear
policy? Does this concern constitute a potential breach of TI-UK	
policy? Is there an identified victim?	
Is there sufficient information to follow up this report	Yes/No
What policy (policies) are applicable to this incident?	Please select
Safeguarding	
Whistleblowing	
Bullying & Harassment	
Code of Conduct	
Does the report raise any concerns relating to children under the age	Yes/ No
of 18? If it does outline the expert advice being sought to handle this	
matter.	
Does the report raise any concerns relating to a vulnerable adult? If it does outline the expert advice being sought to handle this matter.	Yes/No
Does this matter need to be referred to the authorities for	Yes/ No
investigation? The primary consideration should be the safety of all	
concerned Including the survivor / victim, witnesses and the alleged	
wrongdoer.	
Do we have the relevant expertise and capacity to manage this	Yes/ No
safeguarding case? If not what expertise are we sourcing? Reports of	
sexual harassment, exploitation, abuse, or other forms of sexual	
misconduct could require specialised training and the People team	
will be able to advise on this.	



Clarify what, how and with whom information will be shared relating	Please outline details
to this case. Confidentiality should be maintained at all times, and	
information shared on a need-to-know basis only.	
Consider support to the survivor (victim). Legal, counselling, medical	Please outline how this is
and psychological – note the TI-UK EAP service is confidential and can	being followed up
handle this or provide specific referral routes. Lists of support	
organisations are also maintained. Support should not be imposed, it	
must be led by the survivor (victim). The People team can also provide	
follow-up checks to ensure that the external support channels are	
being of use etc.	
Need to add and clarify that the process has been explained to the	
complainant with what will happen next, including the process for	
feedback/participation of the complainant in disciplinary and	
accountability processes. Written guidance should support this, but	
it should also be verbally communicated to the complainant.	

Case Management

Role	Name and Job Title
Decision Maker	
Person who received the report (such as the	
focal point, or manager)	
People Team Manager assigned	
Safeguarding adviser (or equivalent) if required	
Investigator / Individual undertaking a Fact	
Finding review / Confirmation of suitable	
training on gender-sensitivity (where applicable)	

Decision

These could be (but are not limited to)

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside TI-UK's remit). Details are still to be logged on Confidential Register of Incidents.
- Investigation/ Fact Finding Review is required to gather further information
- Immediate disciplinary action if no further information needed
- Referral to relevant authorities

Case Reporting

UK Charity Commission Serious Incident Report	Yes/ No
Donor Funding: Reporting Concerns	Yes/ No / N/a



Guidance and Support to those affected by Safeguarding

The following organisations can provide guidance and support:

Topic	Find more details
TI-UK Employee Assistance Provider: Health	Log-in and registration details are supplied to
Assured. Helps you deal with personal and	all employees. Speak to the People Team if
professional problems that could be affecting	you require further details.
your home life or work life, health and general	you require farther details.
wellbeing. It provides a complete support	
network that offers expert advice and	
compassionate guidance 24/7, covering a wide	
range of issues.	
Trade Unions: if you are a member of a trade	
union they may have advice and information to	
, , ,	
support you.	
Whistleblowing	https://gretost.oduico.org.uk/
Protect: Speak Up and Prevent Harm. Provides	https://protect-advice.org.uk/
free, confidential whistleblowing advice.	
ACAS: Impartial advice on workplace rights, rules	https://www.acas.org.uk/
and best practice	
Sexual Abuse / Violence	
Sexual Abuse and Support Campaign: Provides a	https://sexualabusesupport.campaign.gov.uk/
range of different organisations that can provide	
information and support for those who have	
experienced sexual abuse or sexual violence.	
If you are over the age of 16, living in England &	
Wales, and have been affected by any form of	
sexual violence or abuse, specialist and	
confidential support is available 24/7. Call 0808	
500 2222 or visit	
https://247sexualabusesupport.org.uk to chat	
online or find out more. Details of services	
available in Scotland can be found at	
https://www.mygov.scot/rape-assault	
The Victim Supports 24/7 Support line can also be	
accessed on 08 08 16 89 111 or via live chat.	
A range of groups and organisations that provide	
24 hour free and confidential support are listed	
and these cover sexual violence and abuse, male	
survivors of rape or sexual abuse (including trans	
or cis gender and non-binary people who have	
experienced unwanted sexual activity), adult	
survivors of childhood abuse and LGBTI+.	
Hate Crime	https://www.discourse
Stop Hate Crime: Provides a range of different	https://report-it.org.uk
organisations that provide support and offer	
guidance on those who have experienced hate	
crime. As well as dedicated charities that support	
Hate Crime there are groups focused on race,	



religion, sexual orientation, transgender, disability, alternative sub-cultures, domestic abuse and bullying and cyber-bullying.	
Other Support Organisations	
Samaritans	
MIND	https://www.samaritans.org/
Citizens Advice	https://www.mind.org.uk/
	https://citizensadvice.org.uk



Enhanced Safeguarding Due Diligence for TI-UK External Partners

The following survey seeks to ensure that TI-UK have appropriate safeguarding standards cascaded down their delivery chain. We are collecting this data as part of our requirement to provide evidence to our donors that adequate standards are in place as well as ensuring that our partners are aware of those expectations.

Safeguarding Policy

Q1: Do you have a policy that is up-to-date and covers bullying, sexual exploitation and harassment, and abuse? (Yes/ No) Please upload copy/ copies of the policy/ policies

Q2: Does the policy cover:

- (i) Your commitment to safeguarding, why this policy is important and that it applies to all without exception (Yes/No)
- (ii) An explanation as to who the policy applies to (trustees/ Board members/ employees/ volunteers) (Yes/ No)
- (iii) A reassurance that all concerns and allegations will be taken seriously and responded to appropriately (Yes/ No)
- (iv) A commitment to safe recruitment, selection and vetting of employees, trustee/Board members and volunteers (Yes/ No)
- (v) Any arrangements for reporting concerns related to the Chief Executive/ Executive Director that could require a different reporting route (Yes/ No)
- (vi) Confirmation that the policy is approved and endorsed by the Board with a review date highlighted (Yes/No)

Q3: Do you have a designated safeguarding contact point within the organization that reports regularly to senior leadership or the board?

INSERT NAME/ JOB TITLE

Q4: Do you currently work with children, vulnerable adults, and/or young people? If yes, Q5 below

Q5: Do you have a child protection policy and/or vulnerable adult's policy that is:

- (i) Considered to be fully up-to-date? (Yes/ No)
- (ii) Has a commitment to inform parents/ carers of the policy and procedure as appropriate? (Yes/No)
- (iii) A reassurance that all concerns and allegations of abuse will be taken seriously and responded to appropriately? (Yes/ No)
- (iv) Details of how matters may be referred to the police/ children and vulnerable adult services? **(Yes/No)**

Q5: Do you provide refresher training on safeguarding to employees? (Yes/No)

Q6: How often do you to provide this training? Annual / Bi-annual / Ad-hoc

Whistleblowing

Q7: Do you have an up-to-date whistleblowing policy: (Yes/ No) Please upload copy

Q8: Does the policy:

- (v) Apply to both employees and external stakeholders? (Yes/ No)
- (vi) Provides reassurance that reports or allegations made in good faith will not face reprisal? (Yes/No)



- (i) Includes clear processes on the dealing of concerns raised, and by whom, and the timelines involved? (Yes/No)
- (vii) Outline any arrangements for reporting concerns related to the Chief Executive/ Executive Director that could require a different reporting route (Yes/No)

Human Resources

Q9: Do you provide training and guidance to new starters on policies related to safeguarding, whistle-blowing, bullying and harassment, grievances etc? (Yes/ No)

Q10: Do you maintain a training log of employees who have participated in such training? (Yes/No)

Risk Management

Q11: Do you have an up-to-date detailed register of safeguarding issues (grievances, etc.) and how are they dealt with? (Yes/No)

Q12: How many instances have been reported / investigated in the last calendar year related to:

	Reported	Investigated
Safeguarding		
Bullying & Harassment		
Whistleblowing		

Where the numbers require explanation please provide a brief commentary:

Q14: Where there have been no reported instances are you planning to review policies / procedures, internal communication, training etc to provide reassurance that matters are not going unreported? Yes/ No / Not considered necessary

Q15: Have your programme areas altered or changed in the last year that exposes you to more risks related to working with children and / or vulnerable people. (Yes/ No)

The Code of Conduct

Q16: Do you have in place an up-to-date Code of Conduct for employees and Volunteers that sets out clear expectations of behaviours – inside and outside the workplace – and what will happen in the event of non-compliance or breach of these standards? (Yes/ No) Please upload copy

Q17: Are all employees and volunteers provided with training on the code of conduct as part of their induction? (Yes/ No)

Q18: Has there been recent (within the last six-twelve months) communication to all employees and volunteers that reiterates the tone from the top in relation to safeguarding and acceptable behaviour? (Yes/ No)

Governance and Accountability

Q19: Are safeguarding matters reported to the Board as a standing agenda item? (Yes/No)

Funding to Partners

Q20: Do you provide funding to other partners? (Yes/ No) If yes, Q21

Q21: Where you provide funding are there policies and procedures in place to cover the Safeguarding Framework as outlined above? (Yes/ No)



Sharing Resources

We recognise that we have opportunity to learn from each other and that there may be aspects we have covered where our own systems and processes could be enhanced. If you have guidance or suggestions to make to us please use the area below to highlight these.



Glossary of Terms

Based on the BOND guidance the following definitions are used wherever possible by TI-UK. For certain terms (#) we indicate a preference for an alternative term to be commonly used.

https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms#definitions

Allegation (#)

An allegation is a claim that someone has done something wrong, but there is not yet evidence that proves the claim to be true. We prefer to use the term "potential wrongdoing" instead of "allegation"

Case Closure

A case is considered closed when one of the following conditions is satisfied:

- (a) "A case was decided to be unsubstantiated or for which further investigation was not warranted and for which a closure report has been issued.
- (b) Alternatively, a case was concluded to be substantiated, accountability measures have been implemented and completed.
 - (c) Where circumstances prevented a full investigation of the case.

Complainant (#)

A complainant is commonly understood as a person who files a complaint (see below). The term complainant may cause stigma for the person who raises a concern or shares details of an incident. Use of this word may stop people from reporting. Given that safeguarding issues include serious misconduct, criminal acts and human rights violations, and cannot simply be called complaints it may be better to use terms such as: **person raising a concern or an incident; or reporter**.

Complaint (#)

Specific grievance of anyone who has been negatively affected by an organisation's action or who believes that an organisation has failed to meet a stated commitment. **We prefer to use concern, report or incident**.

Concern

A cause of anxiety or worry". A safeguarding concern is a feeling or worry that a child or adult may be at risk of harm, or may have been harmed, by the organisation's staff, associates, programmes or operations. Concerns may relate to something directly seen or heard, or may relate to information which has come to the organisations through any means. A concern is not yet confirmed or fact-checked.

Conclusion of an Investigation

The conclusion of an investigation is...the point where a decision is made that either:

- (a) There is sufficient factual information to make recommendations about the reported possible misconduct; or
- (b) The matter can no longer be effectively pursued and must be closed.



The conclusion of an investigation is not the same thing as the closure of a case. An individual survivor/victim as well as the potential wrongdoer may need ongoing support whether or not the investigation is complete. There will likely also be administrative actions, Human Resource actions and internal and external reporting requirements to be completed and documented prior to a case being closed. New evidence may come to light after a case is concluded. The case would then be reopened and further enquiries may be necessary

Fact Finding

Ensuring the investigation of allegations of misconduct that involve people or entities with a direct contractual link. The word fact-finding is commonly used in one of two ways, either:

(a) As a preliminary action to establish if there are grounds for further enquiry – this may include collection of written statements. (b) As the term used in place of investigation, with a similar meaning and function. The terms inquiry and investigation generally cover formal legal proceedings

Incident

A safeguarding incident refers to an act or series of acts of violence or abuse by one perpetrator or group of perpetrators. May involve multiple types of violence (physical, sexual, emotional, economic, socio-cultural); and may involve repetition of violence over a period of minutes, hours, or days. Safeguarding incidents are specifically those where: firstly the incident intentionally or unintentionally causes harm, or risk of harm, to staff, associates or members of the community – children or adults; and secondly harm is caused by the organisation's staff, programmes, or operations.

Incidents can also refer to frauds, thefts, significant financial losses, criminal breaches, terrorism or extremism allegations. This can include actions of partners, including partners based overseas.

Investigation

A fact finding and analytical process designed to gather information in order to determine whether wrongdoing occurred and, if so, the persons or entities responsible

Mandatory Reporting

Mandatory reporting may refer to either:

- (a) The contractual obligation to report safeguarding concerns or incidents internally, to an organisation.
- (b) The legal obligation to report certain concerns or incidents to local or national authorities, including police.
- (c) The obligation of organisations working outside their country of registration to report certain incidents or concerns to regulatory, legal, or other entities in their country of registration.

Report

A report is the term used to describe any incident, concern, or suspicion being raised with an organisation, once the organisation receives information and logs the case for action.



A report on the conduct of a staff member may cover a range of issues – including but not limited to: general programme feedback; concerns about general misconduct such as fraud, inappropriate use of organisational resources, and use of illicit substances; and disclosure of incidents of abuse, neglect, exploitation, violence, or harassment.

Safeguarding

Safeguarding is an umbrella term that covers Protection from Sexual Exploitation and Abuse, sexual harassment and is increasingly used, in the international humanitarian community, as a broad term that covers all forms of maltreatment or harm caused by staff, associates, operations, or programmes, where survivors are affected populations and/or other staff members — either adults or children. Globally, safeguarding is not always a recognised term and can be difficult to translate.

Suspicion

A suspicion is a concern or reported incident that is, as yet, not proven by evidence to be true.

Survivor

The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors because it implies resiliency. Individuals themselves must also be able choose whether they are referred to as a survivor or a victim.

Survivor-centred

A survivor-centred approach means that the survivor's rights, needs and wishes are prioritized.[...Where the individual has rights:]

- To be treated with dignity and respect.
- To choose.
- To privacy and confidentiality.
- To non-discrimination.
- To information.

A survivor-centred approach puts the safety, wishes and interest of the survivor first, above all other considerations. Taking a survivor-centred approach requires that an organisation talks to and listens to the survivor in ways adapted to each and every single survivor. A survivor-centred approach indicates that the survivor's wellbeing should be prioritised over and above other actions such as internal reporting requirements, protecting an organisation's reputation, completing a fact-finding process or reporting a concern or incident to legal authorities.

Wrongdoer/ potential wrongdoer

A wrongdoer is a person who does things that are immoral or illegal. The term wrongdoer is more easily understood as the person who is thought to have caused harm compared to alternatives such as subject of the complaint/report. Subject of the complaint may be misunderstood as the survivor. **Potential wrongdoer is preferred over perpetrator and alleged perpetrator** as it encompasses a wider range of behaviours relevant to safeguarding. Common understanding of the term perpetrator



is that it describes a person who has committed a crime. Not all safeguarding concerns are criminal acts.

Whistleblower

A whistleblower is someone who shares details of a concern or incident. They may be a witness or advocate or they may have heard about the concern or incident by some other means. They themselves are not the survivor. An advocate is a person selected by the survivor to share details of a concern or incident on their behalf.