

1. Tearfund

Tearfund Scotland Incident Report to the Scottish Government

Project: REDACTED

Date of incident: REDACTED 2009

In REDACTED 2009, Tearfund's Country Representative in Malawi received a verbal report from a Tearfund partner that there had been an allegation of sexual abuse by a staff member of the partner on a Scottish Government funded project. The Country Representative reported this to Tearfund's Child Development Advisor, who obtained further details and completed a Child Protection Reporting Form. This form was then submitted to Tearfund's Child Protection Officer for follow up support and advice.

The allegation was that a senior staff member of the partner had sexually abused a 16-year-old girl who attended the project. The victim was removed from the project for her safety to live with an aunt and was provided with support and counselling. The partner's disciplinary panel investigated the case and the staff member was dismissed for gross misconduct.

The victim's guardian reported the matter to the Police in Malawi and the alleged perpetrator was arrested and questioned but no charges were brought.

Tearfund's Child Development Advisor conducted a child protection capacity-building workshop for the partner and other Tearfund partners working with children at risk in Malawi in October 2009. Tearfund also supported the partner in producing its own child protection policy. A follow up child protection workshop was scheduled for January 2011 but this did not take place as Tearfund ceased working with this partner in 2010.

At the time of the incident Tearfund took all the steps it reasonably understood were necessary to safeguard the individual and deal with the situation. A summary of this incident was reported to the Charity Commission on 22 February 2018 as part of the outcome of our internal review of historical safeguarding incidents.

REDACTED

Tearfund REDACTED

26th Feb 2018

From: REDACTED

Sent: 26 February 2018 16:54

To: REDACTED

Cc: REDACTED

Subject: Re: Tearfund incidence report

Dear REDACTED,

Apologies, I have attached an updated summary of the safeguarding incident in Malawi. The previous version, sent this morning, said that Tearfund had taken legal advice at the time of the case however it has just been clarified that as this case related to a partner who took their own advice, Tearfund did not obtain legal advice on this matter. Please delete the earlier version and I apologise for the confusion.

Kind regards,

REDACTED

On 26 February 2018 at 12:52, REDACTED wrote:

Dear REDACTED,

I have attached an incidence report of the issue that I discussed with REDACTED on Friday. REDACTED discussed this case with the Minister on Friday so he is also aware. Please don't hesitate to contact me if you have any questions.

We would ask that if this becomes the subject of a FOI request, that details of the project name is redacted so the victim cannot be identified.

Kind regards,

REDACTED

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REDACTED
REDACTED, Scotland

From: Allan A (Alasdair), MSP [<mailto:Alasdair.Allan.msp@parliament.scot>]

Sent: 23 February 2018 15:42

To: Minister for International Development and Europe

Subject: Tearfund

Phoned me at constituency office just now to alert me that they will be sending more information on in writing about a safeguarding incident from 2009. I don't think there is anything in this that you have not been made aware of, but in case there is, the background is that this incident, involving one of their workers on the REDACTED project and a 16 year old girl in Malawi was reported to both their child protection officer and the police at the time, though the police enquiry did not result in charges. They have now reported this incident to the Charities Commissioner.

ALASDAIR ALLAN

Member of the Scottish Parliament for Na h-Eileanan an Iar
Ball Pàrlamaid Albannach airson nan Eilean Siar

20 Kenneth Street, Stornoway, HS1 2DR

01851 700357 alasdair.allan.msp@parliament.scot

British Sign Language (BSL) users can get in touch using [contactSCOTLAND-BSL](#)

From: REDACTED **On Behalf Of** Minister for International Development and Europe

Sent: 23 February 2018 11:43

To: REDACTED

Cc: Minister for International Development and Europe; REDACTED

Subject: RE: Follow up from Monday

Hi REDACTED,
Officials, FYI

15:00 is best for the Minister. The number to get him on is REDACTED.

REDACTED

**REDACTED | REDACTED | Minister for International Development and Europe |
Alasdair Allan MSP
REDACTED, 2N.15, St Andrew's House, Edinburgh, EH1 3DG | BB: REDACTED**

MinisterIDE@gov.scot | www.gov.scot

All e-mails and attachments sent by a Ministerial Private Office to another official on behalf of a Minister relating to a decision, request or comment made by a Minister, or a note of a Ministerial meeting, must be filed appropriately by the primary recipient. Private Offices do not keep official records of such e-mails or attachments.

From: REDACTED
Sent: 23 February 2018 09:39
To: Minister for International Development and Europe
Subject: Re: Follow up from Monday

Great, thanks!

Kind regards

REDACTED

REDACTED
REDACTED

Tearfund Scotland
Challenge House
29 Canal St
GLASGOW
G4 0AD

Tel: REDACTED
Mobile: REDACTED
www.tearfund.org

On 23 February 2018 at 09:37, <MinisterIDE@gov.scot> wrote:

Hi REDACTED – I've forwarded the Minister your email and asked best time and number to get him on today. Will let you know what he says.

REDACTED

**REDACTED | REDACTED | Minister for International Development and Europe |
Alasdair Allan MSP**

REDACTED, REDACTED, St Andrew's House, Edinburgh, EH1 3DG | BB:

REDACTED

MinisterIDE@gov.scot | www.gov.scot

From: REDACTED

Sent: 22 February 2018 18:35

To: Minister for International Development and Europe

Subject: Follow up from Monday

Dear Alasdair

I am writing to follow up on our conversation from Monday morning. Firstly, I've been informed that as an agency registered in both Scotland and England, we only need to report to the Charity Commission and not to OSCR as per OSCR guidelines.

Secondly, we have finished our historic review of cases that would now be considered as safeguarding incidents and these have all now been reported to the Charity Commission this afternoon. This includes one incident from a Scottish Government funded project from 2009 which I can update you on if you are able to call me on my mobile on Friday morning, or please let me know a good time to call your office.

Kind regards

REDACTED

REDACTED

REDACTED

Tearfund Scotland

Challenge House

29 Canal St

GLASGOW

G4 0AD

Tel: REDACTED

Mobile: REDACTED

www.tearfund.org

2. Oxfam

From: REDACTED
Sent: 18 February 2018 13:19
To: REDACTED
Cc: REDACTED; REDACTED; REDACTED
Subject: Oxfam

Dear REDACTED

Thank you for your emails to REDACTED on Friday evening and apologies for keeping you in the office late.

In our letter to the Minister, Dr Alasdair Allan, we said we would make no future applications to the Scottish Government International Development Programme for consideration for funding by the Government until our trustees consider it is appropriate to do so.

To this effect, we have already withdrawn our recent application to the Humanitarian Emergency Fund for funding of our emergency work in the Democratic Republic of Congo.

Given the current circumstances we would also like to withdraw from consideration the two concept notes we recently submitted to the International Development Fund Malawi round.

Like the Scottish Government, we believe that sexual abuse, harassment and exploitation must never be tolerated, and that it is vital that all grantees of Scottish Government funding can demonstrate best safeguarding policy and practice.

When both parties agree that we have reached a point that Oxfam meets the rigorously high standards expected of a grant recipient, we would appreciate the opportunity to make applications again.

Representatives from Oxfam hope to meet with the Minister and senior civil servants next week. During these discussions, I fully expect that specific requirements pertaining to those standards will be laid out.

Best regards

REDACTED

REDACTED | REDACTED
Oxfam Scotland | Glasgow | +44 (0)141 285 REDACTED | REDACTED |
skype: REDACTED | www.oxfam.org.uk/scotland | twitter.com/oxfamscotland

From: REDACTED
Sent: 16 February 2018 22:12
To: REDACTED

Cc: REDACTED; REDACTED

Subject: RE: Oxfam has agreed to stop bidding for UK government funding

Dear REDACTED,

Thanks for this, and for taking the time to deal with my queries.

Could I ask another question? The letter refers to Oxfam not submitting 'further applications for funding' until the Trustees agree that it is appropriate to do so. Could I ask if Oxfam would consider the current Concept Notes submitted to the Malawi funding round, to fall within this moratorium and should be considered withdrawn? The reason I ask is that we are presently running a two stage process for the Malawi Development Programme. The first being the Concept Note stage, followed by a Full Application stage.

My apologies for contacting you this late.

REDACTED

From: REDACTED

Sent: 16 February 2018 21:20

To: REDACTED

Cc: REDACTED

Subject: Re: Oxfam has agreed to stop bidding for UK government funding

Dear REDACTED,

No problem about you getting in touch, and I appreciate you doing so on a Friday evening.

Please see attached a letter submitted from me to the First Minister and Dr Allan earlier today with the confirmation you request.

I hope this provides the detail you require, and I apologise you are having to work after hours.

Many thanks,
REDACTED

REDACTED | REDACTED Oxfam Scotland

Oxfam Scotland | Glasgow | +44 (0) 141 285 REDACTED | mobile: REDACTED

www.oxfam.org.uk/scotland/blog | www.facebook.com/oxfamscotland |

Twitter:REDACTED

From: REDACTED

To: REDACTED

Cc: REDACTED; REDACTED

Date: 16/02/2018 21:02

Subject: Oxfam has agreed to stop bidding for UK government funding

Dear REDACTED,

My apologies for contacting you this late on a Friday.

The BBC are reporting (see below) on their website that Oxfam are to withdraw from bidding for any UKG funding for the time being. As you will be aware the Scottish Government has to be confident that any organisation we fund meets the high standards expected of our investment partners, as do the UK Government and DFID. Currently Oxfam Scotland have submitted two Concept Notes to the Malawi Development Programme 2018-2023.

Given the announcement regarding UK Government funding, I write to seek clarification as to whether this decision extends to bids to the Scottish Government's International Development Programme?

REDACTED

REDACTED | REDACTED | International Development Team | The Scottish Government | REDACTED | Victoria Quay | Edinburgh | EH6 6QQ | Tel 0131 244 REDACTED | BlackBerry REDACTED

<https://beta.gov.scot/policies/international-development/>

Oxfam has agreed to stop bidding for UK government funding until it can show it meets the "high standards" required, ministers say.

International Development Secretary Penny Mordaunt said the charity had "a long way to go" before regaining the trust of the public, its staff and the people it aims to help. Oxfam has faced criticism over the way it handled claims staff hired prostitutes in Haiti in 2011.

It has apologised and promised reforms.

In the wake of the allegations, the charity's deputy chief executive resigned and some celebrity backers severed their ties with it.

- **Oxfam chief promises justice for victims**

How much UK charity money goes to Oxfam?

The charity, which had a total income of £409m last year, received £31.7m from the government in 2016. This represents about a quarter of a percent of the government's annual foreign aid spending.

In a statement, Ms Mordaunt said that following a meeting with Oxfam bosses on Monday, the charity "has agreed to withdraw from bidding for any new UK government funding until DfID (the Department for International Development) is satisfied that they can meet the high standards we expect of our partners".

She said hundreds of "good, brave and compassionate" Oxfam staff had been poorly served by the leadership, adding: "Clearly Oxfam have a long way to go before they can regain the trust of the British public, their staff and the people they aim to help.

"The actions and attitude of the organisation over the coming weeks will be critical."

Ms Mordaunt said she had made three demands of Oxfam - that it makes clear how it will handle any future allegations, that staff members involved are reported to their national governments and that it cooperates with the Haitian authorities.

"Oxfam has now confirmed that they have complied with all of these points," she said.

<http://www.bbc.com/news/uk-politics-43091489>

Dear First Minister and Dr Allan,

Thank you for your letter, Dr Allan, dated 14 February 2018.

I whole-heartedly agree, and fully endorse, your commitment to demanding the highest moral and ethical standards of those in receipt of Scottish Government funds. As you know, this is something we have championed. In this context, the last few days have been extremely difficult and disappointing.

The truth is: Oxfam did not do enough to protect women from sexual exploitation. As REDACTED, that's an extremely painful statement to make. I've felt ashamed, appalled, and deeply, deeply sorry to learn about the pain inflicted by some men working for Oxfam internationally, regardless of when it happened. I've felt particularly distraught for those women directly impacted. Worse still, when incidents happened, Oxfam did not respond well enough.

I have also felt huge distress for the many volunteers and supporters across Scotland who put their faith in us, and for colleagues working so hard across the charity sector. This also applies to those who strongly champion international aid, including, of course, both of you personally, the Scottish Government, and your party colleagues at Westminster. In the coming period, such champions will be needed more than ever.

Safeguarding

In your letter, you requested reassurance in relation to the safeguarding policies we have in place to protect vulnerable groups. Clearly, given what has happened, these have not been strong enough and we must do more to prevent and tackle this unacceptable, unconscionable behaviour.

Since the shocking events in Haiti in 2011, improvements have been made: we've put in place a dedicated safeguarding team, a confidential whistle-blower mechanism and tightened up our policies. Here in the UK, safeguarding in our shops has also been enhanced in recent years; all managers and their deputies, as well as volunteers in supervisory roles, have enhanced disclosure and barring checks.

In detail, as an appendix, how we deal with current safeguarding allegations and how we will deal with any forthcoming allegations. However, it is clear we've still got work to do. Therefore, today, our Executive Director Winnie Byanyima, has announced a comprehensive plan of action to strengthen safeguarding systems across the organisation and stamp out abuse, including asking leading women's rights experts to lead an urgent independent review of its culture and practices.

The plan was agreed yesterday by in partnership with Oxfam GB Chief Executive Mark Goldring and directors across the international confederation. The wide-ranging package of measures includes:

- A new independent High-Level Commission on Sexual Misconduct, Accountability and Culture Change, comprised of leading women's rights experts, which will be able to access Oxfam records and interview staff, partners and communities it supports around the world.
- The immediate creation of a new global database of accredited referees – designed to end the use of forged, dishonest or unreliable references by past or current Oxfam staff. Oxfam will not be issuing any references until this is in place.
- An immediate injection of money and resources into Oxfam's safeguarding processes, with the number of people working in safeguarding more than doubling over the coming weeks and annual funding more than tripled to £720,000.
- A commitment to improve the culture within Oxfam to ensure that no one faces sexism, discrimination or abuse, that everyone, especially women, feels safe to speak out, and everyone is clear on what behaviour is acceptable or not.
- Oxfam is committing to publish its 2011 internal investigation into staff involved in sexual and other misconduct in Haiti as soon as possible, after taking steps necessary to

prevent witnesses being identified. The names of the men involved have already been shared with the authorities in Haiti.

The High-Level Commission will operate at arms-length from Oxfam and will shape its own approach. We will announce those involved within the next few days, and Oxfam will provide the resources it needs to do its job effectively, across the Oxfam confederation, including full access to records, staff as well as partners and communities supported by the organisation. As part of the Commission's work, it will create an historical record about cases of sexual misconduct and abuse of power that is as complete as possible, which will be made publicly available – and we will, of course, share this with you.

I hope the above measures go some way towards demonstrating that Oxfam could not be taking our commitment to either safeguarding or transparency more seriously. While we are determined to continue providing support to the millions of vulnerable people we work with around the world, we are equally committed to doing all we can to protect those we seek to help.

Next Steps

I also wanted to update you on our engagement with the Humanitarian Emergency Fund. As you know, we championed the creation of the Fund and supported the Scottish Government to design it. Prior to recent events, as a panel member, we applied for funding for our emergency response in the Democratic Republic of Congo. This was selected by the Panel for recommendation to the Scottish Government. However, to ensure there is no barrier or delay in the funding reaching those who need it, we have now withdrawn our application for this funding. I hope you agree this is appropriate.

Beyond this, out of respect for our long-standing partnership with the Scottish Government and to minimise any further distraction from the crucial role the Government's international development programme plays, I can confirm Oxfam will submit no further applications for funding until such time as the trustees of Oxfam agree that it would be appropriate for us to do again. I trust this will avoid embarrassment or further distraction.

I have also personally written to all MSPs to express, on behalf of the entire Oxfam team in Scotland and Oxfam GB, my sincere apologies and shame in relation to the terrible incidents of sexual misconduct. I will update all MSPs again later today on the new measures outlined above.

We will, of course, continue to engage and update Scottish Government civil servants – and my colleague REDACTED, REDACTED, has been in touch separately with you Dr Allan. We know these problems cannot all be solved by Oxfam alone, and we will work with governments, the Charity Commission, women's rights organisations and others in the sector to implement urgent reforms.

For 75 years, with the public's help, we have been there for the world's poorest people: from the famine in Greece in 1942 to supporting the people of Yemen today. We must continue to be there.

On a personal level, I've been proud to work for Oxfam here in Scotland for REDACTED, during which time I have seen for myself the incredible impact of our work, including projects funded by the Scottish Government. Internationally, and here in Scotland, I know the organisation is full of committed staff and volunteers who are continuing to make remarkable life-saving, life-changing work happen.

We recognise we must rebuild the trust we've breached with all those who support us so that together we can continue this critical work

As ever, do not hesitate to be in touch.

Best regards,

REDACTED
REDACTED

Appendix Current policies

The foundation of our approach to Safeguarding is prevention. All Oxfam GB employees across the world are required to sign our Code of Conduct, which forms part of their employment contract. The Code of Conduct clearly sets out and explains the behaviours expected and required of staff and associates when carrying out any work for Oxfam, and sets the foundation for our Safeguarding work. This was introduced in 2012, and most recently updated in September 2017.

We have current core Safeguarding (Protection against Sexual Exploitation and Abuse (PSEA)) policies. These are our Safeguarding (PSEA) policy, our Vulnerable Adult policy and our Child Protection policy. These policies set out the standards of behaviour expected from all Oxfam GB staff and representatives, and the protections offered to anyone under Oxfam's duty of care. These are complimented by our full suite of HR policies. All will be shared with your colleagues. Work to update them in the light of recent lessons is underway and will be presented to our governing body in March.

Current processes

All Oxfam GB employees are obliged to report any suspicions of sexual exploitation, abuse, or harassment of others. Staff also have particular obligations to report any risks to Children and Vulnerable Adults. Failure to report to a relevant person is a breach of Oxfam policy, and could lead to disciplinary action being taken.

Any member of staff can report concerns of any kind to any of the Safeguarding Team (currently 4 staff, rising to 6 once appointments are made to two new posts currently being recruited) or the world-wide Safeguarding Focal Points network (currently 71 trained staff, with focal points in all countries where OGB teams are based). Oxfam GB also operates a separate Whistleblowing line for staff who fear victimisation or dismissal as a result of making a report. We currently use external investigators to augment internal capacity and provide an external perspective on cases where we judge this is required.

Current cases

We are currently investigating twenty-nine safeguarding cases. Of these, twenty are international, six involve our UK divisions and three are from our trading network of shops.

We are currently receiving information about a higher number of incidents than ever before because of high level of focus internally and externally on safeguarding issues. We have been proactively encouraging staff to report any incident they are concerned about since we created our dedicated safeguarding team in 2012.

Strengthening independence, and increasing external scrutiny

Following our meeting, we have identified a consultancy firm, Ineqe Group, to work with us to strengthen external scrutiny and are finalising terms of reference. This will add external capacity to investigate cases, to provide strategic external oversight of the safeguarding function and to carry out an external review of our case handling to date. Their work will also contribute to the Charity Commission Inquiry, and they will have a direct line of contact to the Charity Commission.

We have accelerated work already in progress and signed contracts this week with NAVEX Global for the provision of an independent hotline to easily and confidentially report any issue or instance of misconduct, and an independent case management system. The hotline will be available 24/7, 365 days a year, and will enable Oxfam GB staff based around the world to have access to an independent reporting facility. NAVEX

global are prioritizing setting up the helpline, which they have assured us will be live within the next 10 – 30 days.

Disclosure, and liaison with relevant prosecuting authorities

We are committed to full disclosure of all relevant details of cases when we find evidence of sexual exploitation and / or abuse. We report any cases where a crime may have taken place to the relevant prosecuting authorities for investigation, as long as the victim is willing for us to do this.

The engagement of an external consultancy firm to provide oversight of our safeguarding function will provide independent scrutiny to provide additional confidence that we are behaving transparently and cooperating fully with relevant prosecuting authorities.

From: REDACTED

Sent: Friday, 16 February 2018 16:49

To: REDACTED; REDACTED

Cc: REDACTED; REDACTED; REDACTED; REDACTED

Subject: Oxfam's comprehensive action plan: Note to Scottish Government

Dear REDACTED and REDACTED

I am following up on the communication you will have received from my colleagues in Oxfam Scotland, to inform you of the comprehensive plan of action that Oxfam is putting in place to strengthen our current safeguarding systems across our organisation and to stamp out abuse.

I am writing to send you three documents. The first is our press release of this morning (UK time) announcing a new Independent High-Level Commission on Sexual Misconduct, Accountability and Culture Change, comprised of leading women's rights experts, to lead an urgent independent review of Oxfam's culture and practices. The press release also outlines further actions, and communicates our deep commitment to continuing to provide support to the millions of vulnerable people we work with around the world, and learning vital lessons from our past mistakes to make sure such abuse and exploitation does not happen again.

The second document further outlines our immediate actions and our plans for the future. This includes working in partnership across the aid sector to ensure people are safe, recognising that there are necessary actions that we cannot take on our own.

The third document is our follow up to the summary of Oxfam Great Britain practices, with summary of the Safeguarding Policies and Process which other Oxfam Affiliates have in place, to provide you with a comprehensive, global picture of our practise.

We know there is much to do, but we are determined that this range of measures will go a long way to continuing to mitigate safeguarding risks. We also know that these measures themselves will need to be constantly reviewed updated, and improved upon, and we would welcome any suggestions that you may have to help us enhance on these working practices ensure that we continue to meet your expectations.

Please continue to contact me, if you would like to ask me questions or seek further assurance.

With best wishes

REDACTED

REDACTED | REDACTED

Oxfam GB | John Smith Drive, Oxford, UK | Tel: REDACTED | Mobile: REDACTED

skype: REDACTED | Email: REDACTED

www.oxfam.org.uk | www.facebook.com/oxfamgb | <https://twitter.com/oxfamgb>

Embargoed for 06:00 GMT Friday 16 February 2018

Oxfam announces comprehensive action plan to stamp out abuse

Oxfam today announced a comprehensive plan of action to strengthen safeguarding systems across the organisation and stamp out abuse, including asking leading women's rights experts to lead an urgent independent review of its culture and practices.

The plan was agreed yesterday by Oxfam International Executive Director Winnie Byanyima in partnership with Oxfam GB Chief Executive Mark Goldring and directors across the international confederation. The wide-ranging package of measures includes:

- a new independent High-Level Commission on Sexual Misconduct, Accountability and Culture Change, comprised of leading women's rights experts, which will be able to access Oxfam records and interview staff, partners and communities it supports around the world.
 - The immediate creation of a new global database of accredited referees – designed to end the use of forged, dishonest or unreliable references by past or current Oxfam staff. Oxfam will not be issuing any references until this is in place.
 - An immediate injection of money and resources into Oxfam's safeguarding processes, with the number of people working in safeguarding more than doubling over the coming weeks and annual funding more than tripled to £720,000.
 - A commitment to improve the culture within Oxfam to ensure that no one faces sexism, discrimination or abuse, that everyone, especially women, feels safe to speak out, and everyone is clear on what behaviour is acceptable or not.
 - Oxfam is also committing to publish its 2011 internal investigation into staff involved in sexual and other misconduct in Haiti as soon as possible, after taking steps necessary to prevent witnesses being identified. The names of the men involved have already been shared with the authorities in Haiti. Winnie Byanyima said: "What happened in Haiti and afterwards is a stain on Oxfam that will shame us for years, and rightly so. In my language: "Okuruga ahamutima gwangye, mutusaasire." It means "From the bottom of my heart I am asking for forgiveness."

"Of course words are not enough. I've agreed a plan of action with Mark Goldring and Oxfam's board of international directors. Right now I have two utmost priorities for Oxfam: continuing to provide support to the millions of vulnerable people we work with around the world, and learning vital lessons from our past mistakes to make sure such abuse and exploitation does not happen again. Mark is absolutely the right person to implement these changes in the UK."

Mark Goldring said: "People put their trust in Oxfam and we betrayed that trust. What happened was a disgrace and we are absolutely committed to rooting out abuse across the organisation. We are doubling the number of people who work on safeguarding to make sure we are living up to our responsibility to protect staff, volunteers and the communities we support around the world. An independent commission is being established which will review our entire operations and tell us what we need to change about our culture and practices."

“It’s vital that we act to prevent those guilty of gross misconduct from simply moving onto another organisation and potentially harming other vulnerable people. Within Oxfam, we’re are urgently setting up a new database of people authorised to give references with an immediate freeze on references until that is in place.

“These problems cannot all be solved by Oxfam alone, and we will work with the government, Charity Commission, women’s rights organisations and others in the sector to implement urgent reforms.”

The High-Level Commission will operate at arms-length from Oxfam and shape its own approach. Names will be announced within a few days. Oxfam will provide the resources it needs to do its job effectively, across the confederation, including full access to records, staff as well as partners and communities supported by the organisation. As part of the Commission’s work, it will create an historical record about cases of sexual misconduct and abuse of power that is as complete as possible, which will be made publicly available.

For more information please contact the Oxfam press office: media.unit@oxfam.org.uk / +44 (0)1865 472498

SUMMARY POLICIES OF OXFAM AFFILIATES, INCLUDING THE NINE AFFILIATES WITH EXECUTING AFFILIATE ROLES

- Oxfam is a global Confederation, comprising of 20 Affiliates, and operating in 67 Countries. Nine of the Oxfam Affiliates (Oxfam Great Britain, Oxfam Novib, Oxfam Intermon, Oxfam Solidarita, Oxfam Quebec, Oxfam Canada, Oxfam Italy, Oxfam Australia and Oxfam America) administer operations within the countries in which we work- this is known internally as an Executing Affiliate role. In addition to the collective framework outlined below, the Oxfam Affiliates playing an Executing Affiliate Role (EA) have developed specific policies which as minimum fit into the collective framework, but adapt it to their specific legal context and donor requests.
- A summary of each Executing Affiliate Safeguarding Policies and Procedures are included in the Annexes.
- All Policies and Procedures referenced here are available.
- Since 2012 all Oxfam Affiliates align to policies approved by Oxfam in the Single Management System Toolkit, which included:
 - RHD6 Oxfam Code of Conduct (version 2012, further revised 2017)
 - RHD7 Oxfam Anti-bullying and harassment policy
 - RHD8 Oxfam Child protection policy
 - RHD9 Oxfam Disciplinary procedures policy
- In 2013, all Oxfam Affiliates endorsed the Oxfam Guide to Mandatory Processes (Green Book) in December 2013, which in addition to the above policies included several HR policies and related policies such as:
 - Oxfam Protocol on Conflict of Interest
 - Oxfam Security Policy
 - Oxfam Aid Diversion Policy
 - Oxfam Policy on Gender Identity and Sexual Diversity
 - Humanitarian Handbook – including Protection, Safe Programming, Complaints Mechanisms
- Since April 2017, all Executing Affiliates and Countries and regions adhere to the One Oxfam Operational Handbook for Countries and Regions

➤ In November 2017 all Oxfam Affiliates have endorsed a revised Oxfam Code of Conduct which includes more robust and stronger guidelines on inappropriate behaviours and sexual abuse and harassment. The revised Code of Conduct is being rolled out to all staff in HQ and 67 program countries before end of February 2018.

➤ In addition to the collective framework above, the Oxfam Affiliates playing an Executing Affiliate Role (EA) have developed specific policies which as minimum fit into the collective framework, but adapt it to their specific legal context and donor requests. The table below provides overview of these specific affiliate policies:

AFFILIATES	EXECUTING IN (2017):		RELEVANT AFFILIATE POLICIES IN ADDITION TO Oxfam International Policies:
OXFAM AUSTRALIA (OAU)	PNG Solomon Islands Micronesia/Polynesia Sri Lanka	Fiji Vanuatu Timor Leste	Whistleblowing Policy (Developed October 2016) Workplace Discrimination & Harassment Policy (Developed in April 2016) Domestic & Family Violence Policy (Developed January 2017) Child Safeguarding Policy (comprehensively reviewed in November 2017)
OXFAM IN BELGIUM (OBE)	Western Sahara Laos		Violence, harassment and unwanted sexual behaviour at work ² (16 June 2007)
OXFAM CANADA (OCA)	Cuba		Whistleblower Protection Policy (from February 2013) No harassment /no violence in the workplace policy (DEC 2010 – SEP 2016) Child Protection Policy (issued 2012 focused on international staff, this was later developed into an OI/Board Child protection policy) Gender Justice Policy (2009, reviewed 2016)
OXFAM GREAT BRITAIN (OGB)	Liberia Sierra Leone Mali Ghana Kenya South Sudan Ethiopia Rwanda	Yemen Lebanon Jordan Syria Iraq Thailand Philippines Indonesia	Safeguarding (PSEA) Policy Child Protection Policy Vulnerable Adult Policy Whistleblowing Policy Anti-Bullying and Harassment Gender Equality Equal Opportunities Policy Sexual Diversity and Gender Identity (Full Policy, and its summary)

2/4

	Tanzania DRC Zambia Malawi Zimbabwe	Bangladesh Myanmar Nepal Pakistan Tajikistan	Complaints Policies Grievance Procedure & Guidelines Conflict of Interest Dealing with Problems at Work Recruitment Policy Disclosure of Malpractice in the Workplace
OXFAM INTERMON (OES)	Haiti Dominican Republic Guatemala Nicaragua Honduras Paraguay Bolivia	Colombia Morocco Burkina Faso CAR Chad Mauritania	Protocol for reporting and handling inappropriate behavior (April 2015)
OXFAM ITALY (OIT)	Bosnia Herzegovina/ Balkans Greece Response		Child Protection Policy (2017)
OXFAM NOVIB (ONL)	Tunisia Egypt Turkey OPTI Afghanistan Cambodia Vietnam	Uganda Burundi Somalia Nigeria Niger Mozambique	Integrity measures: complaints and whistleblowing procedures
OXFAM QUEBEC (OQB)	Benin		Policy against harassment (April 2015)
OXFAM AMERICA (OUS)	Senegal El Salvador Peru Sudan		Prevention of Sexual Exploitation and Abuse Policy (March 2017) Workplace Bullying Awareness & Prevention Policy (March 2017) Unlawful Harassment Awareness & Prevention Policy (March 2017) Whistleblower Protection Policy (March 2017) Sexual Harassment Awareness & Prevention Policy (March 2017) Child Protection Policy (March 2017) Complaint Reporting Policy (March 2015)

3/4

OVERVIEW | FEBRUARY 2018 | IMMEDIATE RESPONSE ACTIONS: SEXUAL MISCONDUCT CRISIS

The purpose of this document is to collate and summarise a range of actions that are currently being undertaken or that have been agreed by Oxfam's leadership in response to the current crisis. The aim is to ensure an urgent, comprehensive and accountable response across the Oxfam confederation which will lead to deep-rooted lasting change.

Our objective is to bring about the necessary changes to our policy, practice and culture to stamp out exploitation, abuse and harassment from all parts of our confederation, protecting those we work with and ensuring justice for survivors of abuse.

The actions listed here focus on:

- Demonstrating a meaningful commitment to **transparency and accountability**, including through the establishment of an **independent commission** to review our past and current work – the findings of which will be public, and the recommendations of which will guide further action by Oxfam
- Changing **policies, practices and culture** within Oxfam, including significantly increasing our **investment in safeguarding** and in gender training and support
- Working with others across the humanitarian and development sector to prevent this from happening again, including efforts to **reform recruitment and vetting processes** to prevent offenders from moving between organisations

1. Appointing an Independent High-Level Commission on Sexual Misconduct, Accountability and Culture Change

Oxfam cannot exonerate itself from the charges made against it and should not try. The High-Level Commission will operate at arms-length from Oxfam and be comprised of senior women leaders from across the world.

The Commission's scope of enquiry will be determined by the Independent Chair in consultation with the Board of Oxfam International, and will have full powers to look at past and present cases, policies, practices and culture. The Commission will listen to criticisms, complaints and allegations, in particularly in relation to abuse of power, and sexual misconduct. It will endeavour to create a comprehensive historical record, which will be made publicly available.

Oxfam will be guided by whatever recommendations the Commission makes.

2. Reiterated commitment across Oxfam to collaborate with all relevant authorities, including regulators and governments

We will redouble our efforts to show transparency and a willingness to cooperate with relevant authorities in any way that can achieve justice for survivors of abuse and help to prevent any instance of abuse in the future.

This includes proactively reaching out to regulators and governments in countries where we operate to offer to share any information they may wish to see. The aim is to ensure authorities can again feel confident in our policies and processes, with a demonstrable commitment to transparency.

3. Re-examining past cases, and encouraging other witnesses or survivors to come forward

We owe it to anyone who may have been affected by the misconduct of Oxfam staff to

they were dealt with appropriately. If they were not, then insofar as is possible, we will take forceful action now in line with Oxfam's values. This may lead to some current staff facing disciplinary action and possibly losing their jobs.

We will continue to communicate to staff, volunteers, partners and beneficiaries that it is safe, possible and indeed actively encouraged for them to report any instances that they experienced or witnessed that they have previously felt unable to report, or that they reported but feel were not adequately dealt with at the time.

We will ensure we have an effective whistle-blower system that can be easily utilised by staff, volunteers and people external to Oxfam. More resources will be made available for this as needed, in both the short- and longer-term.

4. Increasing our investment in safe-guarding with immediate effect

It is clear that, across the confederation, we have not adequately resourced our safeguarding work until now. We will significantly increase our investment in terms of both budget and staffing to ensure we have the resources in place to ensure the safety and well-being of all those who come into contact with Oxfam staff anywhere in the world.

We will also increase our investment in gender training and support across the confederation, including recruitment of additional gender leads in programmes and humanitarian response teams.

5. Strengthening internal processes

A number of actions are already being taken to improve our internal processes. This includes a database to ensure official references are never given to offenders seeking jobs in other organisations. It includes actions to strengthen the vetting and recruitment of staff, including making commitment to safeguarding a mandatory part of the recruitment and selection process and the performance management criteria for all managers; overhauling the way we induct and train all staff, making safeguarding training mandatory for all current and new staff; and comprehensively retraining all staff to ensure everybody understands Oxfam's values and our code of conduct; and strengthening our whistle-blowing process alongside other tools to ensure it is safe and easy for people to raise concerns.

All Oxfam affiliates will have trained safeguarding focal points, and there will be trained safeguarding focal points at all major events organized by Oxfam.

We will re-check that reliable systems are in place for reporting any suspected illegal activity to the relevant authorities.

6. Re-enforcing a culture of zero tolerance towards harassment, abuse or exploitation

We will continue to act to change cultures within Oxfam and throughout our sector that enable any form of harassment, exploitation, discrimination or abuse. This involves identifying and appointing agencies to work with and support Oxfam in achieving the cultural shift that is needed. Oxfam's Physical, Sexual and Emotional Abuse (PSEA) Taskforce has already made recommendations that will be reviewed and acted upon with urgency.

7. Working with our peers across the sector to tackle physical, sexual and emotional abuse

We will work with the rest of our sector to ensure people are safe, recognising that there are necessary actions that we cannot take on our own. This includes action to ensure offenders who have lost their job with one organization cannot move on to a role in

another. We will actively contribute to and support joint action by international NGOs. We will work with UN bodies, the International Civil Society Centre, and other joint NGO platforms to agree concrete proposals for how we can move forward as a sector.

As part of this, we will contribute to the work initiated by BOND in the UK to develop a concept for a humanitarian passport and/or anti-offenders' system housed by an accountable agency such as UN OCHA. We will support such initiatives in any way we can.

8. Active engagement with partners and allies, especially women's rights organizations

We will reach out to partners and allies to rebuild trust and to seek their input on how we can learn and improve. We have a particular responsibility and need to reach out to women's rights organisations and others who work on Physical, Sexual and Emotional Abuse (PSEA) issues, to answer their questions, to hear their reflections and concerns, and to ensure our responses are defined in consultation with them, based on their insights and expertise.

We will reach out to women's rights organisations in every region of the world and convening meeting spaces involving us, them, governments and other stakeholders.

9. Listening to the public

We will listen to and learn from feedback from supporters around the world. We will ensure two-way communication with them, responding to the concerns they raise and explaining the actions we are taken to learn and change.

10. Recommit to and strengthen our focus on gender justice externally

We reiterate and reinforce our commitment to putting women's rights and gender justice at the centre of our work. Recognizing we have a lot to learn and put right as an organization, Oxfam will continue to build investment in advocacy, campaigns and programming focused on tackling the injustices women living in poverty face around the world. This includes addressing social norms that cause violence against women, campaigning to rectify systematic power imbalances that trap women into poverty, and partnering with feminist and women's rights organizations to address gender injustice at all levels. It includes strengthening and focusing our development and humanitarian programmes to deliver transformational change in the lives of women living in poverty.

From: REDACTED

Sent: Monday, 12 February 2018 18:56

To: REDACTED

Subject: Fw: CALL WITH REDACTED? Re: Oxfam

Dear REDACTED

We realise that some of our donors are being contacted by the media for a statement in light of the recent media coverage over Haiti.

We also fully expect further stories in the media in relation to safeguarding issues, including national news this evening. We will of course endeavour to keep you fully informed. In case you are contacted for a statement, please see below some media resources.

We have a REDACTED REDACTED on hand to support in case of any media enquiries

REDACTED REDACTED

Oxfam announces the resignation of our Deputy Chief Executive
<https://www.oxfam.org.uk/media-centre/press-releases/2018/02/oxfam-announces-resignation-of-deputy-chief-executive>

Statement by Oxfam GB's Board of Trustees Caroline Thomson.
https://www.oxfam.org.uk/media-centre/press-releases/2018/02/oxfam-commits-to-improvements-in-aftermath-of-haiti-reports?intcmp=HPWWLWP_grid_haitiReports

Oxfam statement responding to allegations of Oxfam providing references for colleagues accused of sexual misconduct
<https://www.oxfam.org/en/pressroom/reactions/statement-responding-allegations-todays-times-oxfam-failed-warn-other-ngos-not>

Our statement to The Times on 10th February
<https://www.oxfam.org.uk/media-centre/press-releases/2018/02/oxfam-response-to-the-times-story>

Mark Goldring and Caroline Thomson, Oxfam GB Chair of Trustees had a challenging but positive meeting with Penny Mordaunt, International Development Secretary today. We shall share DFID's press statement as soon as we have it.

If you have any questions, please do not hesitate to contact myself of REDACTED for any additional information.

Best wishes

REDACTED

REDACTED | REDACTED
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skype: REDACTED | www.oxfam.org.uk/scotland | twitter.com/oxfamscotland

From: REDACTED
To: REDACTED
Date: 12/02/2018 01:45
Subject: Re: CALL WITH REDACTED? Re: Oxfam

Hi REDACTED

Sorry I didn't get back to you yesterday afternoon.

I did manage to talk to REDACTED briefly and REDACTED was able to voice his concerns over recent developments concerning Oxfam.

I have attached below the most recent press release outlining Oxfam's response to articles in the media over the weekend.

I suggested that it would be good for us to have a face to face meeting as soon as you are both back from REDACTED.

In the meantime, please don't hesitate to contact me if you have any questions.

Many thanks

REDACTED

New media statement from Oxfam GB chair of trustees Caroline Thomson

Immediate release: Sunday 11 February 2018

Oxfam commits to improvements in aftermath of Haiti reports

Announcing a package of measures to strengthen the prevention and handling of sexual abuse cases, Caroline Thomson, Oxfam GB Chair of Trustees, said:

“As the new Chair of Oxfam I share the anger and shame that behaviour like that highlighted in Haiti in 2011 happened in our organisation. It is clear that such behaviour is completely outside our values and should never be tolerated. Oxfam prides itself of being a transparent organisation that works to make life better for poor and vulnerable people, an organisation that puts women at the heart of everything we do. In the words of our Chief Executive Mark Goldring, we are ashamed of what happened. We apologise unreservedly. We have made big improvements since 2011 and today I commit that we will improve further.

“My job as a new chair is now to look forward. Mark Goldring and I are working closely together to lead this. We will continue to address the underlying cultural issues that allowed this behaviour to happen. We also want to satisfy ourselves that we do now have a culture of openness and transparency and that we fully learn the lessons of events in 2011. Not only will we always be true to those we serve and those who support us, we will also be seen to be so.

“As a direct result of the stories in The Times, staff members have come forward with concerns about how staff were recruited and vetted in this case. We will examine these in more detail to ensure we further strengthen the improved safeguarding, recruitment, vetting and staff management procedures that were put in place after 2011.

“Earlier this year, our board of trustees appointed an independent consultant to review how we can better promote and enforce a positive culture right through all of our workforce and drive out unacceptable behaviour. This builds on the work we have done since 2011 to tackle abuse, including setting up a dedicated whistleblowing line and a safeguarding team.

“We will now extend the review’s remit to take a detailed look both at this case and our recruitment and management of staff in challenging environments and emergencies, where the urgent need for staff to be put in place to help save lives puts enormous pressure on recruiters to fill posts. If that review brings about a safer environment for all, then the publicity of the last few days, painful as it has been, will also have been valuable.

“This is part of a package of measures that I am announcing today that will strengthen our vetting, and induction of staff as well as a commitment to drive positive behaviour among all staff and improve compliance with our policies. We will be meeting with both the Department for International Development and the Charity Commission during the next week to discuss the details of these measures and to explore further action.

“As recent events have shown, sexual abuse is a blight on society and Oxfam is not immune. Indeed, NGOs that work in often fragile and unstable environments can become targets for abuse. We have made significant improvements since 2011 in our efforts to

expose and eliminate sexual abuse but we know we have to be vigilant and to continue to improve if we are to constantly live up to the high standards rightly expected of us. It is not sufficient to be appalled by the behaviour of our former staff - we must and will learn from it and use it as a spur to improvement.”

ends

Notes to editors:

The initial package of measures announced today to further improve safeguarding within Oxfam include

- Strengthening the vetting and recruitment of staff, including making safeguarding a mandatory part of the interview process for senior leadership positions
- Widening the current review of our practice to ensure we revisit improvements already made and learn additional lessons from Haiti 2011, with a particular focus on challenging circumstances and fast-onset emergencies
- An overhaul of staff induction to ensure staff learn more about our values and code of conduct and mandatory safeguarding training within the first few weeks of employment
- Use the forthcoming recommendations from the ongoing review of practice to strengthen management oversight to ensure compliance with our policies and learn from our mistakes
- Establishment of a new, independent, external whistleblowing helpline as part of an effort to encourage more staff to come forward early with any concerns they may have
- Work with the rest of our sector in an attempt to overcome the legal difficulties which have so far prevented us from sharing intelligence among NGOs and other organisations about people who have been found guilty of sexual misconduct
- Recommit to report to the appropriate authorities in full, any issues that arise that could affect the safety of those we work for or the confidence of the public

REDACTED | REDACTED

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From: REDACTED
To: REDACTED
Date: 11/02/2018 14:55
Subject: CALL WITH REDACTED? Re: Oxfam

From: REDACTED
Sent: 10 February 2018 18:43
To: REDACTED
Cc: REDACTED
Subject: Oxfam - Haiti

Dear REDACTED and REDACTED,

I am writing to share with you both a letter from Oxfam GB's Chief Executive Mark Goldring, in relation to the appalling events involving Oxfam staff in Haiti in 2011.

I know, like me, you will both be extremely shocked and disappointed by what happened, and I wanted to ensure you had the full facts.

My colleague, REDACTED, our REDACTED, has also been in contact with REDACTED REDACTED.

If you wish to discuss this further, I am happy to do so,

Best regards,

REDACTED

REDACTED | REDACTED

Oxfam Scotland | Glasgow | +44 (0) 141 285 REDACTED | mobile: REDACTED
www.oxfam.org.uk/scotland/blog | www.facebook.com/oxfamscotland |
Twitter: REDACTED

Dear Colleague,

You will doubtless have seen extensive coverage of the events relating to Oxfam in Haiti in 2011. As a supporter of international development and friend to Oxfam's work you will share with me the anger and disappointment concerning the completely unacceptable behaviour of nine members of Oxfam staff which we exposed in Haiti in 2011. This behaviour was of course completely contrary to our values and the high standards we expect of our staff.

Yesterday I was at pains to reassure our staff and the public that whilst we feel intense shame for the conduct of these individuals, I feel immense pride in them and our work. Having seen the scope, skill and power of our work with Rohingya refugees in Bangladesh last week, I know how important it is that we continue this, while ensuring that we never tolerate and get better at preventing any abuse of power.

Please allow me to answer some questions that you may have here, and invite you to get in touch directly with your concerns.

As soon as we became aware of the allegations in 2011 we immediately launched an internal investigation. Our primary aim was always to root out and take action against those involved but we also publicly announced, including to media, both the fact that there was an investigation and the action we took as a result (on the 5th August and 5 September 2011 respectively). Four members of staff were dismissed as a result of the investigation and three, including the country director, resigned before the end of the investigation.

The misconduct findings related to offences including the sexual misconduct charge as well as bullying, harassment, intimidation and failure to protect staff. The sexual misconduct findings related to the use of prostitutes. Allegations that underage girls may have been involved were not proven.

Early in the investigation, the country director, who was not part of the original or wider allegations made by a whistleblower, admitted that he had himself paid for sex in Haiti and took full responsibility for events that took place under his management. He was permitted to resign on the basis that he fully cooperated with and supported the investigation. We believed at the time that this allowed us to tackle the problem more thoroughly as well as ensuring that the relief and rehabilitation programme continued to deliver for people in need while we urgently brought in emergency replacement leadership.

Oxfam Trustees, the Charity Commission and DFID, as well as other major donors of our Haiti work including the EU, WHO and UN agencies, were kept informed of the investigation and its outcome.

The Charity Commission were informed at the time that these were sexual misconduct cases. The Commission confirmed on hearing the outcome that Oxfam had taken appropriate action and that it therefore had “no regulatory concerns”. There is no question that they asked to see any more detail which was withheld. They have since also received the action learning review from the case as part of a wider look into our safeguarding. We are meeting the Charity Commission this week and naturally any further documentation they would like to request will be provided.

I understand the concern that authorities in Haiti should have been involved. The legal advice we received in Haiti was that given the nature of the allegations, relating to the use of prostitutes, especially with the continued upheaval and chaos post the earthquake, it was extremely unlikely that reporting these incidents to the police would lead to any action being taken.

Allegations that Oxfam covered up the scandal at the time are simply not true. We were actually proactive in informing press, public, donors and regulator that there had been serious misconduct, and also that public money had not been misused. With hindsight, and in the climate of 2018, it may be that we should have given more detail on the specific nature of the charges, and it can also be questioned whether it was right to allow the country director to resign rather than complete a disciplinary process. But these were decisions made in good faith for good reason at the time.

After the investigation, we carried out a thorough review of the case which resulted in the creation of our dedicated Safeguarding Team and a confidential 'whistleblowing' hotline and tightened our code of conduct as part of a package of measures to ensure that we do all we can to protect our staff, prevent sexual abuse and misconduct happening in the first place and improve how we handle any allegations.

However, we do think there may be a case to be made for further sector-wide reform. For instance, it is incredibly disturbing this morning to learn that the staff involved were able to move to further employment in the sector. We believe they fundamentally had the wrong values for the work and we were clear that we would not, and did not, provide official references. Unfortunately, we cannot prevent false references or former colleagues providing them in a personal capacity which is what we believe must have happened. Nor can we currently communicate the unsuitability of these people to the many thousands of aid agencies active and hiring in humanitarian responses around the world. A reform here, to effectively and legally make available such information and prevent such people being able to easily move on, would be something we'd be keen to explore with other agencies and policy makers.

Every year, Oxfam, supported by the British public and tens of thousands of staff and volunteers, saves and improves well over ten million lives. This is not in any way a reason for tolerating the outrageous behaviour of a few, but it does mean we have to be committed, both to driving it out and rebuilding public trust and support to continue this vital work.

I am sorry for the disappointment and concern this news will have caused you. Do not hesitate to get back to me directly with queries.

Best Wishes,
Mark

Mark Goldring
Chief Executive

Hi REDACTED. Would you be available for a call with REDACTED either today or tomorrow - preferably today.

Sent from my BlackBerry 10 smartphone.

From: REDACTED
Sent: Friday, 9 February 2018 21:02
To: REDACTED
Subject: Re: Oxfam

Thanks REDACTED

There will be more coverage over the weekend and we may respond officially once we have sight of this.

I'll keep you posted.

Have a good trip.

Best wishes

REDACTED

REDACTED | REDACTED
Oxfam Scotland | Glasgow | REDACTED | REDACTED |
skype: REDACTED | www.oxfam.org.uk/scotland | twitter.com/oxfamscotland

From: REDACTED
To: REDACTED
Date: 09/02/2018 17:35
Subject: Re: Oxfam

Thanks REDACTED. I'm with REDACTED just now in REDACTED and have advised REDACTED of your email and shared with REDACTED.

Again thanks for updating us on Oxfam responses on issues

Sent from my BlackBerry 10 smartphone.

From: REDACTED
Sent: Friday, 9 February 2018 18:50
To: REDACTED
Subject: Oxfam

Dear REDACTED

You may be aware of today's news coverage about allegations of misconduct by Oxfam staff in 2011, during our response to the 2010 Haiti earthquake.

Publications, including The Times, are reporting that a small number of Oxfam's humanitarian aid workers were involved in the sexual exploitation of local women and girls

Oxfam was at the time and still is appalled at what happened in Haiti. However, we strongly dispute claims of covering-up the alleged incidents, having launched an internal investigation at the time and publicly announced its outcome. Oxfam has a zero-tolerance policy on sexual abuse and exploitation, and treats all allegations very seriously.

Further information is outlined below from an email recently circulated to Oxfam's Board of Trustees:

As soon as the allegations - which included sexual misconduct, bullying and intimidation - were reported in Haiti in 2011, we launched an internal investigation. Four members of staff were dismissed as a result of the investigation and three, including the country director, resigned before the end of the investigation. No beneficiaries were involved in the allegations. We kept our trustees and the Charity Commission fully informed, with the Charity Commission confirming at the time that we'd taken appropriate action and it had no regulatory concerns.

We released a proactive statement to the press when we launched the investigation and another at its conclusion a month later. DfID was informed as were all donors to our Haiti programme, including the UN, EU and WHO (even though there were no allegations or evidence of misuse of donor funds). We then carried out a thorough review of the case which resulted in a package of measures including the creation of our dedicated Safeguarding Team and a confidential 'whistleblowing' hotline.

The vast majority of Oxfam's 230 staff in Haiti following the earthquake worked tirelessly in the most difficult conditions to provide vital aid to those affected, assisting 300,000 people in the first three months alone and more than half a million over the following months, and years with water, sanitation, hygiene, food and livelihood support. Our longer-term development work remains in Haiti today, where we are a trusted partner by government and local communities.

If you have any questions or concerns about the current media coverage, please do not hesitate to contact me.

Many thanks and best wishes

REDACTED

REDACTED | REDACTED

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3. SCIAF

From: REDACTED on behalf of REDACTED

Sent: 22 February 2018 17:06

To: REDACTED

Cc: REDACTED

Subject: Safeguarding at SCIAF

Dear REDACTED

Thank you for your letter of 13th February regarding sexual abuse and exploitation in the aid sector, and for your phone call on Monday morning. Please find attached our response to your request for information regarding safeguarding in SCIAF. The letter also outlines some proposals on safeguarding in the aid sector in the future.

We have also attached a copy of our Child and Vulnerable Adults Safeguarding Policy and Procedure.

We would greatly welcome the opportunity to fully participate in further discussions on safeguarding in the sector, so that we can all work in partnership together to ensure that we uphold the highest moral and ethical standards expected in safeguarding for all of our staff, volunteers and project participants.

Yours sincerely

REDACTED
REDACTED

REDACTED



SCIAF
Uniting to end poverty
Caritas Scotland

Dr Alasdair Allan
MSP The Scottish
Parliament
Edinburgh
EH99 ISP

Scottish
Catholic
International
Fund 19
Park Circus
Glasgow G3 6BE

22 February 2018

Dear
Minister,

Thank you for your letter of 13th February regarding sexual abuse and exploitation in the aid sector, and for your phone call on Monday morning. We would like to thank you for your firm commitment to ensuring that all children and vulnerable adults are safeguarded.

As you requested, we are pleased to write to you now to assure you that we have all the essential elements of safeguarding that you require:

Providing a Safe and Trusted Environment

We can assure you that SCIAF takes sexual misconduct and the safeguarding of children and vulnerable adults extremely seriously and does not tolerate any misconduct of this kind. The REDACTED personally oversees all child protection and safeguarding matters in SCIAF and works closely with REDACTED to

ensure that any cases are dealt with quickly, decisively and appropriately. We have an internal Safeguarding Committee which includes the REDACTED and senior managers, which meets quarterly to ensure policies and procedures are being implemented and oversee the management of any alleged cases. In between scheduled meetings, the REDACTED meets if required.

Organisational Culture

SCIAF is explicit in its vision, mission and values, and continually fosters a culture in which any abuse or misconduct is not tolerated. All staff and volunteers who work with children are trained in our policies and procedures, and commit to adhere to them. All staff and relevant volunteers have a morning's training to refresh their understanding of safeguarding issues annually. This is given by a well known and respected safeguarding expert in the sector and is compulsory. We have a whistleblowing policy and require staff to report any allegations of abuse immediately.

SCIAF's Safeguarding Systems

We have thorough safeguarding policies and procedures in place which meet national and international standards, which were reviewed recently. We are pleased to attach SCIAF's *Child and Vulnerable Adults Safeguarding Policy and Procedures* for further reference.

In addition, we have been working closely with our partners over the last few years to develop their safeguarding policies and conduct training for staff and volunteers. We also stipulate in our grant agreements that partners must report to us any safeguarding issues immediately as

well as proactively asking partners if they have had any cases when we conduct field visits. All SCIAF partners who are receiving Scottish Government funding have safeguarding policies.

Handling Incidents and Allegations

In over 50 years we have had two cases reported to us relating to sexual misconduct and both were dealt with quickly, decisively and appropriately. Neither of these cases were associated with programmes funded by the Scottish Government.

The first case was in REDACTED in REDACTED when a REDACTED who REDACTED for one of our partners was accused of REDACTED his REDACTED, a REDACTED REDACTED. The accused was a REDACTED REDACTED. The police arrested the REDACTED on the REDACTED. REDACTED -the REDACTED that SCIAF was working through in REDACTED immediately suspended the REDACTED from REDACTED with them. The REDACTED REDACTED visited and met the REDACTED and REDACTED REDACTED REDACTED REDACTED and arranged REDACTED for them. REDACTED REDACTED and REDACTED was given to REDACTED. Our REDACTED, when visiting neighbouring REDACTED, was made aware of the incident and contacted our partner, REDACTED REDACTED, on REDACTED to establish what had happened and what action they had taken. The police had already been informed but we but we understand that the case was subsequently dropped due to lack of evidence. Following this incident we organised child protection training for all our REDACTED partners in REDACTED of the same year. Now all our REDACTED REDACTED REDACTED partners have the child protection policy.

The second case was in REDACTED in REDACTED involving a REDACTED REDACTED of the REDACTED office with share with our sister organisations from REDACTED / REDACTED and REDACTED accused of REDACTED with a REDACTED. He is an REDACTED REDACTED. We suspended the individual immediately, fully co-operated with the police investigation and conducted a thorough internal investigation of the incident. We established that the employee had contravened our REDACTED REDACTED and procedures, for which REDACTED was dismissed for REDACTED REDACTED. As the organisation based in London was the lead agency for Human Resources in the office and was the direct employer of the staff member, they reported this directly to the UK Charity Commission. The case is still pending with the police and we will continue to co-operate fully with their investigation.

In both cases the REDACTED against whom the allegations were made were removed from office as soon as local management was made aware. We were alerted to the REDACTED case by the police who had arrested the accused and in REDACTED our partners immediately reported the case to the police. Subsequently, we and our partners assisted the police fully in their investigations. The cases were also reported to our Board of Trustees.

The REDACTED case was reported to the Charity Commission in REDACTED and OSCAR were satisfied with this reporting line. We have subsequently agreed with OSCAR that any case of sexual abuse should be immediately reported to them, irrespective of it being reported to any other bodies. The REDACTED case was not reported to OSCAR at the time as OSCAR did not have the necessary reporting mechanisms in place until 2016. However, the case has since been reported to OSCAR in light of recent events. In both cases we acted decisively, and followed our organisational policies and procedures.

We did not report the cases to the Scottish Government at the time as we had not understood that this was required. Indeed, checking our contracts with you in the last two weeks, the reporting requirements regarding safeguarding are ambiguous and it would be good to include this as an explicit requirement in future contracts. That said, as soon as the revelations regarding Oxfam began to emerge we declared the cases to your team and submitted the attached reports.

We trust the above gives you the reassurance you require. If you need any more information or have any further questions, please do not hesitate to contact us.

Looking to the future, we would like to step back and look at the architecture of the system and the existing checks and balances which play complementary roles.

Firstly, we international humanitarian and development agencies: must have the moral leadership, culture, and robust systems to minimise the likelihood of abuse happening in our operations; must maintain a supportive environment in which people can safely report suspicions or allegations without fear of reprisals; and must deal quickly, decisively and appropriately with any cases we receive. We must be confident in our authenticity and courageous in being willing to be open and transparent about these matters.

Secondly, we welcome the role of the police and the Criminal Prosecution Service, and the equivalent bodies in any jurisdiction we work. They are the appropriate bodies to investigate any alleged incidents. We as agencies should report any allegations to the appropriate authorities as soon as we become aware of them, and then fully cooperate in any investigation. We should not investigate the cases ourselves, nor do anything else that might prejudice the investigation or prevent conviction.

Thirdly, we welcome the role of a strong regulator – the Office of the Scottish Charity Regulator (OSCAR) in Scotland or the Charity Commissioner in England and Wales – established by, and accountable to their respective Parliament. Their responsibility is to scrutinise any cases we report and to reassure the public that, having examined the cases, they are assured that the agency has acted professionally and appropriately. Once a case has been filed by the regulator without outstanding questions for the agency, their sole roles thereafter are to reassure the public that they are satisfied and report to the respective parliament. If new information comes to light, they may decide to reopen their investigation but they must explain why their initial investigation was incomplete and must continue to reassure the public that hitherto the agency had been assessed to

have acted appropriately.

Having been in Scotland, the behaviour of the regulators seems to have been a decisive difference between the handling of these stories and the confidence of the public. When we spoke about our cases in the media last week, OSCR immediately came out to confirm that they knew about our cases, that the cases were limited in scope, and that we had handled them quickly, decisively and appropriately. This was very reassuring for the Scottish public.

Fourthly, the role of donors is to assess the appropriateness, quality and impact of the programmes they are considering, and reassure themselves that the agency has robust systems in place and is in good standing with the police and the regulator.

Fifthly, it would be advantageous to have an Institute of Humanitarian and Development Workers or a similar professional body by which we are certified and accredited. As in other professions, this would then be the competent authority to adjudicate individual cases and disbar any individuals guilty of gross misconduct. This is missing in the current architecture and being able to consult such a body when recruiting staff would offer considerable extra safeguards against individuals moving between agencies without the agencies being aware of any major incidents in their past.

In the febrile atmosphere of the last two weeks, and the laudable efforts to take control of the situation and reassure the public, these different roles have been conflated, confused and at times ignored. After the rallying call in the heat of battle, we must go back to our stations and ensure that all the necessary controls and systems are in place.

It is essential:

- that first and foremost, we protect the people we serve;
- that we care for the people who have suffered any abuse and give them any support we can;
- that we ensure that all cases are immediately reported to the police and properly investigated, and that individuals are prosecuted for the crimes they have committed;
- that all cases are reported to the relevant regulator and are properly scrutinised, and that the regulator gives the public the reassurance they need;
- that we improve our accreditation mechanisms for staff so we can reliably reassure ourselves of their suitability for employment.

We would greatly welcome the opportunity to fully participate in further discussions on safeguarding in the sector, so that we can all work in partnership together to ensure that we uphold the highest moral and ethical standards expected in safeguarding for all of our staff, volunteers and project participants.

Please note that we shall send copies of this letter to the Chairs of the "Culture, Tourism, Europe and External Relations Committee" and the "International Development Cross-party Group" in Holyrood, and the International Development Committee in Westminster, to inform the debate.

Yours Sincerely,



Alistair Dutton
SCIAF Director



Bishop Joseph Toal



1. Child and Vulnerable Adults
Safeguarding Policy and Procedures

Author: SCIAF Safeguarding Advisory Group

Updated: December 2017

(Approved by SCIAF's Board of Director's February 2018)

Review date: December 2018

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2. SCIAF's child and vulnerable adults safeguarding policy statement
3. The child and vulnerable adults safeguarding code of conduct

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4. Promoting good practice in the UK and internationally
5. Recruitment of staff and volunteers
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adults ANNEX A: Definitions of Abuse

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ANNEX C: Pro-Formas/Templates (available on common drive in policies and procedures/child safeguarding folder)

- Appendix 1: Reference Form - for volunteers
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ANNEX D: Reference Documents

1.3 SECTION ONE - SCIAF'S VALUES, PRINCIPLES AND COMMITMENTS

1. THE IMPORTANCE OF SAFEGUARDING CHILDREN AND VULNERABLE ADULTS

SCIAF's Vision, Mission and Values statement sets out our commitment to the rights and dignity of each person; this includes children and vulnerable adults. We are aware of the need to make explicit and visible our determination that SCIAF's work and activities must promote the safety and security of children and vulnerable adults.

Our commitment to safeguard children and vulnerable adults:

Policy Statement agreed by the Bishops' Conference of Scotland safeguarding the welfare of children and vulnerable adults:

"The Catholic Church in Scotland is concerned with the lives, safety, wholeness and well-being of each individual person within God's purpose for everyone.

It seeks to safeguard the welfare of people of all ages who are involved in whatever capacity with the Church and its organisations.

As a Church community, we accept that it is the responsibility of all of us, ordained, professed, paid and voluntary members, to work together to prevent the physical, sexual, emotional abuse or neglect of children and vulnerable adults ."

SCIAF is concerned with the lives, safety, wholeness and well-being of each individual person within God's purpose for everyone.

We are committed to safeguarding the welfare of children and vulnerable adults who are involved in whatever capacity with SCIAF and its partners and associates.

We believe it is the responsibility of everyone associated with SCIAF and beyond to work together to prevent the physical, sexual, emotional abuse or neglect of children and vulnerable adults.¹

¹ Adapted from Awareness and Safety in Our Catholic Communities, NOPCVA (2007)

1.1 Why does SCIAF need a Child and Vulnerable Adults Safeguarding Policy?

To protect children and vulnerable adults:

Internationally, SCIAF works in partnership with a wide range of local and national organisations often working in very difficult situations, for example, in post conflict countries or in regions with high levels of HIV prevalence and large numbers of vulnerable children and adults.

In Scotland we work in schools and with children who need to be reassured about their safety and to know what they can expect from SCIAF.

To protect staff & volunteers and relevant others:

All staff and volunteers and relevant others (such as paid consultants, journalists, overseas visitors etc. - hereby this group are referred to in this policy as 'relevant others') working for SCIAF potentially have contact with children and vulnerable adults, either directly or indirectly

By implementing this policy, all staff, volunteers and relevant other representatives will have clear guidance on their own behaviour around children and vulnerable adults

And what to do if they are told of, or notice, inappropriate behaviour on the part of others.

To protect the organisation

As a Catholic agency, SCIAF is aware of the particular need for the Church and all its agencies to demonstrate good practice in this area, including having a Child and Vulnerable adults Safeguarding Policy and ensuring it is implemented.

Although no policy or guidelines alone can offer complete Safeguarding for children or vulnerable adults, following this policy will minimise the risk to children and vulnerable adults of abuse and exploitation and help keep staff, volunteers, relevant others and SCIAF itself safe.

1.2 Definition s Child

In the context of work with Children in the Catholic Church a "child" is a defined as anyone under eighteen years of age at the time when an offence or alleged offence took place. As per the Protection of Vulnerable Groups (Scotland) Act 2007 children with additional needs or children subject to supervision requirements, the upper age limit from protecting from abuse may be extended.

SCIAF's work is also guided by the UN Convention on the Rights of the Child which also defines a child as below the age of eighteen years unless under the law applicable to the child, majority is attained earlier².

1.4 Vulnerable adult

Within a UK context a **vulnerable adult is defined as a person aged 18 or over,**

*'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.'*³

All adults may be from time to time. An individual who may be:

- Is elderly and frail
- Has a mental health disorder including dementia or a personality disorder
- Has a physical or a personal disorder
- Has a severe physical illness
- Is a substance misuser
- Is an unpaid carer
- Is homeless, displaced or exploited
- Has a learning disability

SCIAF's policy applies to all children and vulnerable adults with whom SCIAF has contact regardless of gender, religion or ethnicity. SCIAF has in place other employment and organisational policies that complement the Child and Vulnerable Adults Safeguarding Policy and help ensure the safety of children and vulnerable adults. These include the Equal Opportunities Policy and the Health and Safety Policy.

1.3 Safeguarding Children & Vulnerable Adults - what does it mean?

All children and vulnerable adults deserve the opportunity to achieve their full potential. The following outcomes are central to their wellbeing⁴ – children and vulnerable adults need to be:

- safe,
- nurtured,
- healthy,
- active,
- respected,
- responsible,
- achieving.

To achieve this, children and vulnerable adults need to feel loved and valued, and be supported by a network of reliable and affectionate relationships, principally within

² Article 1, UN Convention on the Rights of the Child

³ ('Who decides') Lord Chancellor's Department 1997 and Section 2 'No secrets', Department of Health and the Home Office 2000).

⁴ Extracted/adapted from 'Vision for Children', The Scottish Executive 2004

their family groups. If they are denied the opportunity and support they need to achieve these outcomes, children are at increased risk not only of an impoverished childhood, but also of disadvantage and social exclusion in adulthood. Abuse and neglect pose particular problems.

Safeguarding and promoting the welfare of children and vulnerable adults is defined as:

- Protecting children and vulnerable adults from maltreatment;
- Preventing impairment of children and vulnerable adults' health and development;
- Ensuring that children are growing up with safe and effective care;
- Ensuring that vulnerable adults receive safe and effective care;
- Enabling children to have optimum life chances and enter adulthood successfully.
- Enabling vulnerable adults to have optimum life chances.

Child and Vulnerable Adults Safeguarding is a part of safeguarding and refers to the activities undertaken to protect specific children and vulnerable adults who are suffering or are of suffering Significant Harm (ill-treatment, including physical, sexual and other forms of abuse, or the impairment of health or development).

Effective child and vulnerable adults safeguarding is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim proactively to safeguard and promote the welfare of children and vulnerable adults so that the need for action to protect children and vulnerable adults from harm is reduced.

1.4 Who is this policy for?

The policy is for all SCIAF's Board of Directors, paid staff, volunteers, relevant others (such as paid consultants or journalist doing SCIAF work) and any staff or volunteers of a partner involved in the delivery of one of our projects or programme that SCIAF works with internationally. The policy also communicates to others outside SCIAF how we work in relation to child and vulnerable adults safeguarding.

1.5 Who does the policy apply to?

The Policy applies to the Board of Directors, all staff as part of their contractual obligations to SCIAF, volunteer and relevant others. It also applies to all partners and their volunteers who work with SCIAF or in SCIAF's name.

1.6 Purpose of the policy

This document outlines:

- a Policy Statement, which represents a public declaration of SCIAF's intent to safeguard children and vulnerable adults;

- a Code of Conduct which details the standards of behaviour SCIAF expects of its staff and others in their dealings with children and vulnerable adults;

a Framework for Action which provides a clear process by which concerns regarding actual or likely abuse may be raised.

The policy sets out a mandatory internal reporting requirement, which means all concerns must be raised through the line management chain as described in the policy. The policy makes very clear the responsibilities of staff and others under this policy, and also highlights the fact that failure to act in accordance with the provisions set out in the policy may result in disciplinary action or whatever action is appropriate given the circumstances. This should be done in close cooperation with the police and statutory authorities in Scotland and appropriate authorities and agencies overseas.

The policy will be reviewed annually after the compulsory training for all staff has taken place. Minor changes to the policy and procedure will be approved by the Director. If significant changes are required then the policy will be approved by the Board of Directors. Otherwise the policy will be approved every two years by the Board of Directors.

2. SCIAF'S CHILD AND VULNERABLE ADULTS SAFEGUARDING POLICY STATEMENT⁵

2.1 SCIAF recognises the personal dignity and rights of children and vulnerable adults towards whom it has a special responsibility and a duty of care and respect. SCIAF, its Board of Director and all its staff and volunteers and relevant others, undertake to do all in our power to create a safe environment for children and vulnerable adults and to prevent their physical, sexual or emotional abuse. SCIAF is committed to acting at all times in the best interests of children and vulnerable adults, seeing these interests as paramount. We will do this by:

2.1.1 Awareness:

Ensuring that all staff, volunteers and relevant others are aware of the problem of child abuse and the risks to children.

Setting in place, implementing and regularly monitoring and reviewing procedures to protect children and vulnerable adults. These procedures cover as a minimum SCIAF's recruitment practice, staff induction and training, and management responsibilities.

Ensuring that child and vulnerable adults safeguarding awareness and locally appropriate policies and procedures are developed and implemented in international programmes by our offices overseas and with our partners.

2.1.2 Prevention:

Ensuring, through awareness and good practice, that staff, volunteers and relevant others minimise the risks to children and vulnerable adults.

Adopting a code of conduct for all staff, volunteers and relevant others and ensuring they are aware of it and the consequences of failing to adhere to it;

⁵ Modelled on the policy statement recommended by Caritas Internationalis in their Child Safeguarding Policy Framework, 2004 and is consistent with the Policy Statement in Awareness and Safety in Our Catholic Communities, NOPCVA (2007).

2.1.3 Reporting:

Ensuring that staff, volunteers and relevant others are clear what steps to take where concerns arise regarding the safety of children and vulnerable adults.

Ensuring that any allegations of abuse are promptly and properly dealt with, victims supported and perpetrators held to account.

2.1.4 Responding:

Ensuring that action is taken to support and protect children and vulnerable adults where concerns arise regarding possible abuse.

Ensuring that any allegations of abuse are promptly and properly dealt with, victims supported and perpetrators held to account.

Ensuring that SCIAF works closely with Catholic Church's child and vulnerable adults safeguarding structures at all levels and with the police and other statutory agencies when necessary.

3. THE CHILD AND VULNERABLE ADULTS SAFEGUARDING CODE OF CONDUCT⁶

SCIAF is committed to creating and maintaining an environment which promotes its core values and prevents abuse and sexual exploitation. SCIAF's Board of Directors, employees, volunteers, partners and relevant others are expected to uphold the dignity of project participants served by us, and any other children or vulnerable adults we may come into contact with in our daily work, by ensuring that their personal and professional conduct is of the highest standard at all times.

SCIAF condemns all forms of abuse and sexual exploitation. Abuse occurs when adults or other children hurt children or vulnerable adults either physically or in some other way. Definitions of abuse and sexual exploitation are included in Annex A.

All staff, volunteers and relevant others will be asked to sign the Child and Vulnerable Adults Safeguarding Code of Conduct which can be found in Annex B. There are also some simple rules and procedures that will ensure we do as much as we can to keep children and vulnerable adults safe and will minimise the risk of an incident being alleged. It is important that staff and volunteers specifically check that they are being implemented in any event which involves children or vulnerable adults.

1.5 It is important for all staff, volunteers and relevant others in contact with children and vulnerable adults to:

⁶ Adapted from the Caritas Internationalis Code of Conduct to Safeguarding Children and Young People from Abuse and Sexual Exploitation and Awareness and Safety in Our Catholic Communities: A Summary of Good Practice for Paid and Voluntary Workers NOPCVA (2007)

Be aware of situations which may present risks and manage these

plan and organise the work and the workplace so as to minimise risks

as far as possible, be visible in working with children and vulnerable adults

ensure that a culture of openness exists to enable any issues or concerns to be discussed

ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged

talk to children and vulnerable adults about their contact with staff or others and encourage them to raise any concerns

empower children and vulnerable adults - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.

1.6 Staff, volunteers and relevant others must never:

hit or otherwise physically assault or physically abuse children or vulnerable adults

develop physical/sexual relationships with children or vulnerable adults

develop relationships with children or vulnerable adults which could in any way be deemed exploitative or abusive

act in ways that may be abusive or may place a child or adult at risk of abuse.

1.7 Staff, volunteers and relevant others *must* avoid actions or behaviour that could be construed as poor practice or potentially abusive. For example, they should never:

use language, make suggestions or offer advice which is inappropriate, offensive or abusive

behave physically in a manner which is inappropriate or sexually provocative

spend excessive time alone with children or vulnerable adults away from others

take children or vulnerable adults to your home, especially where they will be alone with you.

have a child/children or adult(s) with whom they are working to stay overnight at their home unsupervised

sleep in the same room or bed as a child or vulnerable adult with whom they are working

do things for children or adult of a personal nature that they can do for themselves

condone, or participate in, behaviour of children or vulnerable adults which is illegal, unsafe or abusive

act in ways intended to shame, humiliate, belittle or degrade children or vulnerable adults , or otherwise perpetrate any form of emotional abuse

discriminate against, show differential treatment, or favour particular children or vulnerable adults to the exclusion of others.

- 1.8** 3.1 Do no harm statement in relation to safeguarding:
SCIAF commits to ensure our safeguarding policies and procedures seek to avoid, minimise, or mitigate adverse impacts that may result from our humanitarian and development interventions – the “Do no Harm” principle. Thus we will strive to ensure that the contact we have with children and vulnerable adults does not add to the burden of suffering they already endure. In the context of safeguarding, the “Do No Harm” principle refers to every aspect of our work to safeguard children and vulnerable adults and the communities they live in. It refers to our actions across the different departments and functions of the organisation. Therefore we will strive to mitigate risks that could result from all our operations such as our overseas programming, media and communications, fundraising, outreach work in schools and parishes etc. Risks associated with our operations are picked up via processes and procedures associated with to the different functions of the organisation. For example the guidance on misuse of images developed by our media and communications department

1.9 SECTION TWO - VALUES INTO ACTION: GOOD PRACTICE PROCEDURES FOR PREVENTION AND SAFEGUARDING

4.PROMOTING GOOD PRACTICE IN THE UK AND INTERNATIONALLY

4.1 Child and vulnerable adults safeguarding and our work in Scotland

4.1.1 The Schools' Programme

SCIAF has a Schools' Programme in Scotland which, through around 200 schools visits per annum, directly involves staff and volunteers coming into contact with large numbers of children. This work takes place within the good practice guidance provided by the Scottish government⁷

SCIAF's expectation is that contact with children in schools by staff and volunteers, will be supervised by school staff.

SCIAF expects staff and volunteers to minimise the likelihood of situations occurring in which they are the lone adult with one or more children, for example by having another adult present when giving children a lift in a car. If such situations are unavoidable, precautionary measures should be taken, for example leaving the door to the room open or moving to an area where you will be in plain view of others. For further guidance see Section 4 of Awareness and Safety in Our Catholic Communities, NOPCVA (2007).

In any activity or event involving children which SCIAF has directly organised, a member of staff will be designated as Child and Vulnerable Adults Safeguarding focal point or at the minimum be attended by a member of staff who has received child and vulnerable adults safeguarding training.

SCIAF undertakes to ensure that all staff, volunteers and relevant others, whose work might involve contact with children, will have completed additional recruitment procedures and have obtained a satisfactory Enhanced PVG Check from Disclosure Scotland.

SCIAF staff, volunteers and relevant others involved in Schools Programme, or who may have contact with children as part of their work, will receive child and vulnerable adults safeguarding training and annual refresher training.

SCIAF also welcomes overseas partners to work with SCIAF supporters in Scotland. Any SCIAF partners or other international visitors will be briefed on SCIAF's child and vulnerable adults safeguarding policies and procedures if their visit might involve contact with children or vulnerable adults. A

Member of SCIAF staff or a volunteer will be present with the partner in any work involving children or vulnerable adults.

4.1.2 Other contact with children and vulnerable adults in our work in Scotland SCIAF staff, volunteers and relevant others may also come into contact with children and vulnerable adults through our fundraising, campaigning and general work. For the avoidance of doubt, this policy applies to all staff, volunteers and relevant others who should be recruited according to the guidance in this policy and should be asked to sign and abide by the Code of Conduct.

4.2 Child and vulnerable adults in our international work

SCIAF aims to promote good child and vulnerable adults safeguarding practice, in order to create a positive culture and practice in relation to the safety of children in development and humanitarian programmes. We will do this in the following ways:

4.2.1 With SCIAF staff, volunteers and relevant others:

SCIAF will use the good practice procedures, nationally agreed in Scotland and in line with international good practice, to support SCIAF staff in dialogue with partners;

SCIAF will ensure procedures/guidelines are in place for its staff who observe or are alerted to actual or potential safeguarding concerns overseas. These will cover actions to be taken and will identify appropriate SCIAF staff to contact.

4.2.2 With partners:

SCIAF will work to ensure there is a process of engagement with partners on child and vulnerable adults safeguarding issues to ensure mutual learning and development of good practice, especially in those partners where there may be particular risks or issues in relation to safeguarding children.

SCIAF will strive to assist partners in the development of their policy and in strengthening their response to child and vulnerable adults safeguarding concerns.

SCIAF will consider capacity building work for the purpose of developing child and vulnerable adults safeguarding policies and procedures in partner organisations. This could include supporting SCIAF staff to work as facilitators in the development of this process.

SCIAF will explore and develop shared understanding with partners in relation to the UN CRC and customary law and practices.

SCIAF will share tools and standards with partners.

SCIAF encourages partners to:

Share their views and experiences with SCIAF staff and understand SCIAF's standpoint on child and vulnerable adults safeguarding.

Express a commitment to child and vulnerable adults safeguarding issues by ensuring child and vulnerable adults safeguarding policies are based on the UN CRC, as a minimum standard.

Commit themselves to examine child and vulnerable adults safeguarding issues within their context, particularly those directly linked to their work.

Implement a child and vulnerable adults safeguarding policy through their employment practices, programme/project planning and general awareness raising of staff and beneficiaries.

1.10 4.2.3 Testimonials

All overseas visitors to SCIAF must have a letter of recommendation from their local Bishop (in the case of clergy) and/or their Board of Directors (if NGO) stating that person is trustworthy and has no known criminal record/complaint against them in relation to child/vulnerable adult abuse or other issues i.e. corruption and that they are basically recommending them to visit SCIAF and have no concerns around the behaviour of the person. In relation to clergy, this letter should be sent directly to the Archbishop of Glasgow. Please see Appendix 6: Testimonial Letter.

All overseas visitors should receive our Child and Vulnerable Adults Safeguarding Policy and asked to sign the code of conduct and Child and Vulnerable Adults Safeguarding Policy stating they have read and understood it before undertaking SCIAF work.

On arrival at SCIAF, a member of the Safeguarding Advisory Group would review the Child and Vulnerable Adults Safeguarding Policy as well as give advice to make sure they understand fully its implications.

All overseas visitors will be accompanied at all times on visits to schools and parishes and at no time will be left alone with children or adults during SCIAF business.

If visitors want to stay longer in the country it should be pointed out to them and their superiors that SCIAF is not accountable for their behaviour and conduct out with the scheduled official visit.

5. RECRUITMENT OF STAFF AND VOLUNTEERS

Like any responsible body, SCIAF must exercise a proper “duty of care” in its recruitment of paid staff and volunteers, particularly those who are being appointed to positions giving access to children and vulnerable adults. Moreover, the Safeguarding of Children (Scotland) Act 2003 makes it an offence for an organisation to appoint someone in a child care position who is on the “Disqualified from Working with Children List”. The Safeguarding Vulnerable Groups (Scotland) Act 2007 and the new Safeguarding of Vulnerable Groups Scheme mean that a similar offence has been created in relation to the appointment to positions giving access to protected adults.

Failure to take advantage of these disclosures to check relevant information about suitability is likely to be seen as a failure in the “duty of care” and could also put those making appointments in a position of having committed an offence. Therefore, the whole selection and recruitment process for paid staff and volunteers who work with children, in a child care position (as defined in Schedule 2 of POCSA) and protected adults (as defined in Part V of the Police Act 1997) must include a PVG Check.⁸

The need for a PVG Check should be based on the extent and nature of the contact with children and vulnerable adults. According to *Keeping Children Safe* “positions that should be subject to a PVG Check include those involving a direct role in relation to children and vulnerable adults, either in groups or one to one situations, on a regular basis or for a period of time”⁹.

SCIAF’s normal recruitment and employment policies and procedures already provide the framework for good practice set out in ‘Protecting Children: A Code of Good Practice 1995, for voluntary organisations. SCIAF has reviewed and strengthened its policies in the light of the principles and outcomes described in the 2007 ‘Safer Recruitment Through Better Recruitment’ produced by the Scottish Executive.

SCIAF will ensure that our employment and recruitment procedures and practices for overseas posts refer to both the Caritas Internationalis Code of Conduct and the international agencies’ Keeping Children Safe.

SCIAF will identify posts in which direct or unsupervised contact with children is possible or likely and ensure that extra care is taken in dealing with applications for such posts: candidates will be asked to describe their previous experience of working with children and vulnerable adults, to provide two referees who can comment on their work with children and vulnerable adults. In addition to this, prospective job applicants or volunteers who apply to work with SCIAF and who will work directly with children and vulnerable adults whilst employed or volunteering with SCIAF, will be required to complete an Enhanced PVG Check. This will happen with both internal and external candidates.

⁸ Adapted from Awareness and Safety in Our Catholic Communities

⁹ Awareness and Safety in Our Catholic Communities Section 3 pages 4-5

1. Adverts and job descriptions for identified posts will include a reference to SCIAF's commitment to child and vulnerable adults safeguarding and our Child and Vulnerable Adults Safeguarding Policy.
2. Job offers made in relation to identified posts will be subject to a self-disclosure, satisfactory clearance from checking of statutory records, including an Enhanced PVG Check from Disclosure Scotland where relevant, and satisfactory verification of qualifications and work history.
3. A parallel practice will operate with regard to volunteers. Any volunteers who are recruited or designated for work with schools or with children, will be asked to complete an application form, a Self Declaration, an Enhanced PVG Check from Disclosure Scotland and to provide two referees.
4. SCIAF has an arrangement with the National Commission for Social and Pastoral Care National Collator and with Diocesan Safeguarding Advisers (DSAs) to act on SCIAF's behalf in obtaining PVG Checks from Disclosure Scotland.

6. ENSURING AWARENESS AND PREVENTION

SCIAF's commitment to child and vulnerable adults safeguarding will be stated in appropriate corporate documents and on our website. SCIAF will make its policy and procedures available to anyone who requests them;

All staff and volunteers will be required to sign the Code of Conduct;

SCIAF will ensure that all staff attend a detailed briefing session on the Child and Vulnerable Adults Safeguarding Policy and have access to a copy. This is also included in the induction programme for all new staff and for volunteers who may have contact with children and vulnerable adults ;

All managers have the responsibility for ensuring that the staff they manage are aware of the policy, and for reminding them of its provisions when the need arises. Managers of identified posts must take part in child and vulnerable adults safeguarding training;

The training needs of staff in identified posts will be assessed and relevant training provided using national agreed resources for our work in Scotland;

Staff in sections or teams whose work involves frequent face to face contact with supporters, or presence at local or national events, should ensure they are familiar with the detail of this policy. They should also know the identity and contact details of the relevant DSA and SCIAF Child and Vulnerable Adults Safeguarding Officer and have contact details for statutory authorities including Social Services and the Police;

The Volunteer & HR Co-ordinator is designated as SCIAF's Child and Vulnerable Adults Safeguarding Officer;

Any SCIAF staff planning events should ensure that child and vulnerable adults safeguarding issues are considered as part of the risk analysis and/or health and safety arrangements;

- In planning or co-ordinating multi-agency or coalition or network organised events and activities, SCIAF will ensure that child and vulnerable adults Safeguarding been taken into account if relevant.
- SCIAF will always fundraise with the best interests of all supporters at heart and will commit to following the Code of Fundraising Practice which can be found here:

<https://www.fundraisingregulator.org.uk/1-0-key-principles-behaviours/>

“Fundraisers MUST take all reasonable steps to treat a donor fairly, enabling them to make an informed decision about any donation. This MUST include taking into account the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.”

7. DEALING WITH ALLEGATIONS AND CONCERNS¹⁰

SCIAF recognises that **allegations** (i.e. when a specific allegation of abuse is made against a named individual) and **concerns** (i.e. when concern is expressed about taken place or be in prospect) should always be taken seriously and acted upon swiftly, making

the welfare of children the paramount consideration

The principle of 'best interests of the child' and the desire to secure the best outcomes for the child should always govern decisions regarding what action to take in response to concerns.

Any information offered in confidence should be received on the basis that it will be shared with relevant people in authority: this might include a SCIAF Child and Vulnerable Adults Safeguarding Officer, DSA and/or, if appropriate, child and vulnerable adults safeguarding personnel in statutory agencies. Parents or carers will also be informed if appropriate and in cooperation with statutory authorities or relevant agencies. Apart from this, confidentiality will be observed.

If a child or vulnerable adult tells you they are being, or have been, abused:

Listen to and accept what the child or vulnerable adult says.

Immediate action must be taken to ensure the child or vulnerable adult's safety.

Do not investigate and do not inform, question or confront the alleged abuser.

Take the alleged abuse seriously.

Reassure the child or vulnerable adult that they have done the right thing by telling you.

Let them know you need to tell someone else. Do not promise total confidentiality.

Let the child speak or vulnerable adults freely but do not press for information.

Let the child or vulnerable adult know what you are going to do next and that you will let them know what happens.

¹⁰ For more information refer to Section 5 of Awareness and Safety in Our Catholic Communities, December 2017 Final Version

Record carefully what you have heard whilst it is still fresh in your mind. Include the date and time of your conversation and any incident disclosed. For incidents in Scotland the form in Section 5 of Awareness and Safety in Our Catholic Communities, NOPCVA (2007). For incidents overseas please use the form in Annex C.

If any member of staff or volunteer suspects abuse, or if a child or vulnerable adult makes a disclosure, or if a person external to SCIAF reports a suspicion or allegation relating to SCIAF staff, volunteers or activities, the following steps should be taken:

Avoid any delay.

Report to the Child and Vulnerable Adults Safeguarding Officer for SCIAF or in their absence another member of the SCIAF Safeguarding Advisory Group.

If the suspicion or allegation relates to activities or persons working in a school, parish or diocesan setting, ensure that the relevant representative from the school or the DSA is also informed.

The Safeguarding Advisory Group will ensure appropriate follow up. If urgent action is required to protect children this should be done immediately.

No staff member or volunteer will prejudice their own standing or position within SCIAF by responsibly reporting potential or suspected child abuse.

8. SCIAF'S MANAGEMENT RESPONSIBILITIES AND HOW WE WILL ACT

See Appendix 5: Flow Chart: Procedure for Complaint Handling for full process.

SCIAF's Safeguarding Advisory Group comprised of the Head of the Integral Human Development Department, the Head of Central Services, an HR Advisor and a Schools Officer is responsible for managing safeguarding within the organisation, regularly reviewing and improving systems, policies and procedures and overseeing the handling of safeguarding cases. The group meets quarterly and is overseen by the Director who regularly participates in meeting. (Appendix 10 – Terms of Reference for SCIAF's Safeguarding Advisory Group).

If a member of staff is the subject of an allegation of child abuse or abuse of a vulnerable adult, that staff member will be asked to take leave from their duties on full pay until an investigation has been completed. If a SCIAF volunteer or relevant other (i.e. paid consultant or journalist working on behalf of SCIAF) is the subject of an allegation of child abuse, that volunteer or relevant other will be asked to withdraw from their work until an investigation has been completed. In both cases, it should be made clear that suspension does not imply guilt but rather protects all parties whilst an investigation is undertaken.

Sexual violence and child abuse are first and foremost a personal tragedy for the people who have been harmed. In the event of any allegations, our first concern will

always be to care for their emotional, physical, psychological and social well-being. SCIAF undertakes to provide support for the alleged victims, witnesses and the alleged abuser whilst an investigation is Carried out. SCIAF will also seek to ensure that any continuing support needed after a situation has been resolved is made available.

If a disclosure of abuse takes place in which the alleged abuser is a member of SCIAF staff, a volunteer or relevant other, or the incident has taken place on SCIAF premises or in connection with SCIAF activities, SCIAF will inform the police and statutory authorities. If a suspicion is expressed, SCIAF will undertake a risk assessment and then take appropriate action, which may involve contacting statutory authorities.

We will then conduct a thorough internal investigation to establish what happened and determine how the case should be handled in accordance with our policies and procedures. The aim of this investigation is to determine whether there was a breach of code of conduct or of the policy and procedures. It is not a criminal investigation into the allegations of abuse in order not to prejudice the policy investigation and subsequent prosecution.

If an allegation of abuse is made involving a member of SCIAF staff, this allegation, together with a record of the investigation undertaken and the outcome, will be recorded in a separate personal file. Confidentiality regarding these records will be scrupulously maintained and information will only be released to the line management of the staff member concerned or to those in positions of authority externally who have reason to need it for the safeguarding of children or vulnerable adults. Records will be kept for 100 years.

After the case has been investigation internally, SCIAF will conduct a learning reflection of its management of the case. Key learning points will be incorporated in appropriate policy and practice.

8.1 Complaint Handling

If you suspect a child or vulnerable adult is being physically, sexually or emotionally abused you should report your suspicions on SCIAF's Allegation/Concern Report Form and pass it immediately to SCIAF's Safeguarding Co-ordinator or in their absence another member of the SCIAF Safeguarding Advisory Group.

If a child or vulnerable adult discloses to you abuse by someone else you should listen, offer support, understanding and reassurance whilst explaining you have to tell appropriate people. As soon as possible you should report your suspicions on SCIAF Allegation/Concern report form and pass it immediately SCIAF's Safeguarding Co-ordinator or in their absence another member of the SCIAF Safeguarding Advisory Group. In all cases:

Take emergency action if required – contact police/social services/medical services immediately as required if it is an emergency situation.

Record everything that was said, including dates, times of conversation and any incidents disclosed.

You must refer.

You must not investigate.

8.2 Partners Reporting

If a complaint is from someone overseas about one of SCIAF's partners, it should be referred to SCIAF's Safeguarding Advisory Group who will note this issue on a log. The Safeguarding Advisory Group will follow up with the partner to ensure that the case has been reported to the relevant bodies and is being managed appropriately. All such issues will be escalated to the Director and Board. The Safeguarding Advisory Group will inform the appropriate regulatory bodies and the donor as required.

SCIAF undertakes to provide support for the alleged victims, witnesses and the alleged abuser whilst an investigation is carried out. SCIAF will also seek to ensure that any continuing support needed after a situation has been resolved is made available.

If a member of SCIAF staff, volunteer or anyone else associated with SCIAF work in some recognisable capacity is found to have committed acts in relation to children or vulnerable adults which are criminal or which contravene in a serious way the principles and standards set out in this policy, SCIAF will refer these to the appropriate authorities and will also take disciplinary and/or any other action which may be appropriate to the circumstances, such as termination of contracts and the ending of volunteering relationships. SCIAF has a legal obligation to refer the person being removed from contact with children to the Disqualified from Working with Children List and to any relevant professional bodies.

9. SCIAF COMMUNICATIONS ABOUT CHILDREN AND VULNERABLE ADULTS ¹¹

Staff should try and make sure that those who may wish to use images/stories of children or vulnerable adults cannot misuse or exploit them. Producing communications *about* children would count as *indirect* contact.

We should always acquire informed consent from the child's parent/guardian, the child's school or the NGO/Partner responsible for the child, and from the children themselves to use the images and stories for SCIAF publications. However, it is not necessary to gain specific individual consent for those in crowd shots. With vulnerable adults their consent, or depending on the nature of their vulnerability their guardian's consent must be sought.

Personal information about a child that could be used to identify his/her specific location within a country should not be used to accompany images.

In addition, our communications about children and vulnerable adults should respect their dignity and identity and not degrade them. Therefore, when communicating about children and vulnerable adults we should also:

Portray them as realistically as possible and communications about children and vulnerable adults should not be sensational, or overtly sentimental.

Take care to represent the ethnic diversity of the children and vulnerable adults in areas where we work.

¹¹ Additional information for our work in Scotland is available in Section 4 of Awareness

Try to represent children and vulnerable adults as individual human beings, with their own opinions and history.

Images of nude or partially clothed children should not normally be used, although in portraying the lives of children in developing countries in a realistic way this may be appropriate and indeed unavoidable. However, images of children in states of undress should not present them in poses that could be interpreted as sexually suggestive or in ways that impact negatively on their dignity or privacy. Should staff wish to use this type of imagery, they should consult the Child and Vulnerable Adults Safeguarding Advisory Group to discuss whether it is appropriate.

Be aware that certain children and vulnerable adults may need extra safeguarding. For example, former child soldiers, those suffering from HIV and AIDS and victims of violence, abuse and exploitation. For example, children and vulnerable adults that have experienced violence or are in some way particularly vulnerable or if identified, should not have their faces displayed or be represented in a way that may lead to their identification.

In many cases it might be appropriate to withhold or change names.

Decisions about the appropriateness of the use of images of children and vulnerable adults by SCIAF should be made by the Head of Communications and Education or the Communications Manager.

Journalists and photographers working with, or on behalf of SCIAF, will be asked to sign the Code of Conduct and to abide by the above guidelines.

1.11 ANNEX A: DEFINITIONS OF ABUSE

Adapted from National Guidance for Child and Vulnerable Adults Safeguarding in Scotland, The Scottish Government 2010, Save the Children UK Child and Vulnerable Adults Safeguarding Policy and the Caritas Internationalis Child and Vulnerable Adults Safeguarding Policy Framework.

Child abuse is a general term used about situations where the child may experience harm, usually as the result of failure on the part of the parent or carer to ensure a reasonable standard of care and Safeguarding. Somebody may abuse or neglect a child by inflicting, or by failing to act to prevent, significant harm to the child. It is normally categorised into four main forms - physical, sexual and emotional abuse, and neglect. It is often the case that a child discovered to be suffering one form of abuse will also be experiencing others.

Children may be abused in a family or in an institutional setting, by those known to them or, more rarely, by a stranger. Child abuse takes place within the context of the family, or outside the family - for example, in institutions, at work (child labour), on the streets (street children), in war zones and emergencies. Recent cases also highlight the abuse of children by professionals or other adults who are employed in positions of trust where they care for or work with children.

The definitions below are based on those employed in Scotland and those employed in an international context. They are offered here as a starting point and guide for those implementing the child and vulnerable adults safeguarding policy and as a guide for those developing local child and vulnerable adults safeguarding procedures in the countries in which we work.

1.12 Categories of Abuse

The circumstances of any one child will not always fit neatly within set categories. Nonetheless the categories form the basis of child and vulnerable adults safeguarding registration and are reflected in inter-agency guidance in relation to child and vulnerable adults safeguarding. The categories are as follows:

Physical Abuse

This is the causing of physical harm to a child. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child they are looking after.

Sexual Abuse

Sexual abuse is any act that involves the child in any activity for the sexual gratification of another person, whether or not it is claimed that the child either consented or assented. Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or in watching sexual activities, using sexual language towards a child or encouraging children to behave in sexually inappropriate ways. Sexual abuse may involve siblings or other family members, or persons outside the family.

Emotional Abuse

Emotional abuse is persistent emotional neglect or ill treatment that has severe and

persistent adverse effects on a child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may involve the imposition of age - or developmentally - inappropriate expectations on a child. It may involve causing children to feel frightened or in danger, or exploiting or corrupting children. Some level of emotional abuse is present in all types of ill treatment of a child; it can also occur independently of other forms of abuse.

Physical Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, to protect a child from physical harm or danger, or to ensure access to appropriate medical care or treatment. It may also include neglect of, or failure to respond to, a child's basic emotional needs. Neglect may also result in the child being diagnosed as suffering from 'non-organic failure to thrive', where they have significantly failed to reach normal weight and growth or development milestones and where physical and genetic reasons have been medically eliminated. In its extreme form children can be at serious risk from the effects of malnutrition, lack of nurturing and stimulation. This can lead to serious long- term effects such as greater susceptibility to serious childhood illnesses and reduction in potential stature. With young children in particular, the consequences may be life-threatening within a relatively short period of time.

Child and vulnerable adults safeguarding is the term used to describe the responsibilities and activities undertaken to prevent or to stop children and vulnerable adults being abused or ill-treated.

Vulnerable children: There are some groups of children who are particularly vulnerable. These include:

Children with disabilities;

Children from ethnic minority communities who suffer from discrimination;

Children who are refugees or asylum seeking;

Children living in residential care;

Children in families where there is alcohol or drug abuse, domestic violence or mental health problems.

Children who have been orphaned by HIV and AIDS.

Protected adults: It should be noted that new legislation in Scotland also provides for adults who are through disability or other factors. For more information refer to Section 6 of Awareness and Safety in Our Catholic Communities, NOPCVA (2007).

~~1.13~~ ANNEX B: SCIAF CODE OF CONDUCT ¹²

As an employee or representative of SCIAF, **I will** promote its values and principles and protect its reputation by:

respecting the basic rights of others by acting fairly, honestly and tactfully, and by treating people with dignity and respect, and respecting the national law and local culture, traditions, customs and practices that are in line with Catholic Social Teaching, moral teaching and UN conventions;

working actively to protect children and vulnerable adults by complying with SCIAF's Child and Vulnerable adults Safeguarding Policy and Procedures;

maintaining high standards of personal and professional conduct;

protecting the safety and well-being of myself and others;

protecting the organisation's assets and resources;

reporting any matter that breaks the standards contained in this Code of Conduct.

Maintaining high standards of personal and professional conduct means I will not behave in a way that breaches the code of conduct, undermines my ability to do my job or is likely to bring SCIAF into disrepute.

For example, **I will not**:

engage in sexual relations with a child or a vulnerable adult or abuse or exploit a child or a vulnerable adult in any way regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not an excuse;

exchange money, employment, goods, assistance or services for sexual favours or other forms of humiliating, degrading or exploitative behaviour;

engage in any form of harassment, discrimination, physical or verbal abuse, intimidation, favouritism or exploitative sexual relations;

drink alcohol or use any other substances in a way that adversely affects my ability to do my job or affects the reputation of the organisation;

be in possession of, nor profit from the sale of, illegal goods or substances;

accept bribes or significant gifts (except small tokens of appreciation) from governments, beneficiaries, donors, suppliers or others, which have been offered as a result of my employment;

undertake business for the supply of goods or services to SCIAF with family, friends or personal contacts or use SCIAF assets for personal benefit;

¹² Adapted from and consistent with Section 4 of Awareness and Safety in Our Catholic Communities, NOPCVA (2007) and international good practice.

behave in a way which threatens the security of myself or others;

use the organisation's computer or other equipment to view, download, create or distribute inappropriate material, such as pornography.

In relation to child and vulnerable adults safeguarding,

1.14 It is important for all staff and others in direct contact with children to:

be aware of situations which may present risks and manage these

plan and organise the work and the workplace so as to minimise risks

as far as possible, be visible in working with children or vulnerable adults

ensure that a culture of openness exists to enable any issues or concerns to be discussed

ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged

talk to children or vulnerable adults about their contact with staff or others and encourage them to raise any concerns

empower children or vulnerable adults - discuss with them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.

1.15 Staff, volunteers and relevant others must never:

hit or otherwise physically assault or physically abuse children or vulnerable adults

develop physical/sexual relationships with children or vulnerable adults

develop relationships with children or vulnerable adults which could in any way be deemed exploitative or abusive

act in ways that may be abusive or may place a child or a vulnerable adult at risk of abuse.

1.16 Staff and others *must* avoid actions or behaviour that could be construed as poor practice or potentially abusive. For example, they should never:

use language, make suggestions or offer advice which is inappropriate, offensive or abusive

behave physically in a manner which is inappropriate or sexually provocative

spend excessive time alone with children away from others

take children or vulnerable adults to your home, especially where they will be alone with you.

have a child/children or vulnerable adult(s) with whom they are working to stay overnight at their home unsupervised

sleep in the same room or bed as a child or vulnerable adult with whom they are working

do things for children or a vulnerable adult of a personal nature that they can do for themselves

condone, or participate in, behaviour of children or vulnerable adults which is illegal, unsafe or abusive

act in ways intended to shame, humiliate, belittle or degrade children or vulnerable adults , or otherwise perpetrate any form of emotional abuse

discriminate against, show differential treatment, or favour particular children or vulnerable adults to the exclusion of others.

1.17 I..... do hereby confirm that I have read, understood and commit myself to comply and to be held accountable for any non-compliance and non-reporting.

(Signature) Date:

Please note: you should keep this copy of the policy for your records. An additional acknowledgement form will also be issued for your signature and which will be kept by Central Services. A copy of all Child and Vulnerable Adults Safeguarding documents are available on the common drive: Policies & Procedures/Child Safeguarding.

**ANNEX C: PRO-FORMAS/TEMPLATES (AVAILABLE ON COMMON DRIVE
IN POLICIES AND PROCEDURES/CHILD
SAFEGUARDING FOLDER)**

APPENDIX 1: REFERENCE FORM FOR VOLUNTEERS

REQUEST FOR A PRIVATE AND CONFIDENTIAL REFERENCE (*Volunteer*)

Dear

1.18 Re:

The above-named person has offered to be a volunteer worker, which may involve contact with the children and/or vulnerable adults.

As I am sure you are aware, before we can accept anyone to work with a person falling into this category, whether on a voluntary or paid basis, we must be sure that they are suitable. In order to do this we have requested references, and your name has been given in this respect.

I would be grateful if you could give your opinion of the person's suitability for the post by completing the enclosed form, which will be treated in the strictest confidence and used only for the purpose for which it was provided. Please return it in the pre-paid envelope as soon as possible.

Should you require any further information please do not hesitate to contact **(Insert Contact Name, Address and Telephone Number)**.

May I take this opportunity to thank you for your help in this matter.

Yours sincerely,

EXAMPLE OF A REFERENCE FORM



PRIVATE AND CONFIDENTIAL

REFERENCE FOR: _____

Your Name:		
Your Address:		
Your Telephone No.:		
How long have you known this person?		
In what capacity?		
Does she/he have any previous experience of looking after or working with children and/or vulnerable adults?	Yes / No *	Comments:
Does she/he have an ability to provide warm, consistent care?	Yes / No *	Comments:
Does she/he have a willingness to respect the background and culture of those in their care?	Yes / No *	Comments:
Does she/he have a commitment to treat all people as individuals and with equal concern?	Yes / No *	Comments:
Do you have any concerns about her/his physical and/or mental health?	Yes / No *	Comments:

* Please circle the appropriate response

The position for which this person is being considered gives substantial access to children and/or vulnerable adults. Is there any reason, to the best of your personal knowledge and belief, why this person should not be appointed to this position of trust?

Yes No

If 'yes' please give details overleaf or, in confidence, contact on

Under the Data Protection Act (UK) the person named above would normally have access to the information provided here if requesting it from the receiving organisation. The organisation providing the reference is exempt under the Data Protection Act - but the organisation receiving the reference is not. If there are strong reasons for protecting confidentiality (risk to

referee, etc) please state them here. For your information the law relating to data protection and references is explained at www.ico.gov.uk.

1.19 Please return in the enclosed stamped addressed envelope. Thank you for your co-operation

Appendix 2: General Information and Consent Form



EXAMPLE OF A GENERAL INFORMATION AND CONSENT FORM

(Data Safeguarding Act 1998 – the information given below will be used solely for the purpose for which it was given. It will be held confidentially, updated when appropriate, and destroyed when no longer required.)

In order to ensure the child's safety, we would be grateful if you would complete and return this form. Please let us know if there are any significant changes. A copy will be retained confidentially by the Group Leader.

Name of Parish:	Name of Group (e.g. Liturgy):
Name of child or vulnerable adult:	Address of Child or vulnerable adult:
Date of Birth:	
Name of responsible adult:	Name of additional responsible adult (in case of emergency):
Telephone No:	Telephone No:
Day Evening Mobile	Day Evening Mobile
Details of any regular medication, medical condition (e.g. asthma, epilepsy, diabetes, allergies, dietary needs) or disability that may affect normal activity.	

RESPONSIBLE ADULT CONSENT

I give permission for the child or vulnerable adults, as named above, to take part in the normal activities of this group.

I understand that separate permission will be sought for certain activities and outings lasting longer than the normal meeting times of the group.

I understand that while involved in the activities of this group he/she will be under the control and care of the group leader and/or other adults approved by the Church leadership and that, although the adults in charge of the group will take reasonable care of the children or vulnerable adults, they cannot necessarily be held responsible for any loss, damage or injury suffered by the child during, or as a result of, the activity.

In an emergency and/or if I cannot be contacted, I am willing for the child to receive necessary hospital or dental treatment, including an anaesthetic.

1.20 Yes / No (delete as

appropriate) Signature:

.....
(parent or responsible adult)

1.21 Name in full:

.....

1.22 Date:

.....

1.23

Appendix 3: EXAMPLE OF A CONSENT FORM FOR THE USE OF PHOTOGRAPHS OR VIDEO



(Data Safeguarding Act 1998 – the information given below will be used solely for the purpose for which it was given. It will be held confidentially, updated when appropriate, and destroyed when no longer required.)

Name of Parish/Organisation:	Name of Group (e.g. Liturgy):
Name and Address of Child or Vulnerable Adult:	Address of responsible adult:
Date of Birth:	Telephone No.
<p>(1) _____ (<i>parish/organisation</i>) recognises the need to ensure the welfare and safety of all children and vulnerable adults.</p> <p>(2) In accordance with the Bishops' Conference of Scotland Awareness and Safety Policy we will not permit photographs, video or other images of children and vulnerable adults to be taken without the consent of the parents/responsible adults.</p> <p>(3) The _____ (<i>parish/organisation</i>) will follow the guidance for the use of photographs, a copy of which is available from _____ (<i>insert name</i>).</p> <p>(4) The _____ (<i>parish/organisation</i>) will take all steps to ensure these images are used solely for the purposes they are intended. If you become aware that these images are being used inappropriately you should inform _____ (<i>insert name</i>) immediately.</p> <p>(5) The images will be displayed in the following circumstances (<i>give details, including dates</i>):</p> <p>_____</p> <p>_____</p> <p>_____</p>	

1.24 RESPONSIBLE ADULT'S CONSENT

I give my consent to _____ **(parish/organisation)**
photographing/videoing the child's involvement in the above-mentioned
activity.

I understand and agree to the images being displayed as outlined above.

Signature:

..... (responsible adult)

Name in full:

Date:

.....

**SCIAF ALLEGATION/CONCERN REPORT FORM
CONFIDENTIAL**

Information received at (time):		On (date):	
By (your name):			
Position:			
Telephone No:			

Information received: (tick as necessary)

Telephone Letter In person By e-mail

This form, along with all relevant documents, should be retained securely and forwarded to the SCIAF Safeguarding Officer as soon as possible.

Alleged victim/survivor, child, or vulnerable adult

Name:			
Age:			

Gender: Male Female

Address:			
		Tel. No. (if known)	

Name of Parent/Guardian/Car		Tel. No. (if known)	
-----------------------------	--	---------------------	--

1.26 Information received from:

Name:		Position:	
Contact Address:			
		Tel. No.	

Person alleged as responsible

Name:		Position:	
Age:			
Contact Address:			
		Tel. No. (if known)	

Information

Record details of allegation(s) or concern(s). If information is given in person, record as precisely as possible what was actually said, the location of the conversation and the identities of persons present. If the space provided is not sufficient please continue on a separate sheet and attach herewith.

1.27 Completed by: (signature) _____ Print name: (in full)

Date: _____

Actions and Further Information

Record all actions taken, agencies contacted and information/advice received with times and dates. Entries to be signed.

Time	Date	Action(s) Taken	Signature



Useful contact numbers:

Police (Pitt Street, Glasgow)

0141 552 2000

Social Services (emergency standby line)

0800 611 505

Child Protection Group

HR & Volunteer Co-ordinator (Safeguarding co-ordinator)

Head of BHD

Head of Central Services

Schools Officer

1.28 Appendix 6: Testimonial Letter

**TESTIMONIAL
LETTER**

Required for Ministry in the Diocese of

.....
..... Bishop/Superior)

hereby state that I
consider.....
(Applicant)

to be a Priest/Deacon/Member of Religious Congregation of good character and standing in the

.....(Diocese/Reli
gious Congregation)

and qualified to undertake pastoral work in the Diocese of
.....

I confirm that, so far as I am aware, there is nothing in his/her background that might suggest that he/she would be unsuitable for working with children and vulnerable adults; nor has he/she any current problems with alcohol or substance abuse.

I confirm that, so far as I am aware, he/she is in good health and not in need of medical attention.

Finally, I give my approval to

..... for

ministry in the Diocese of

.....

Date

Signed

Bishop / Religious Superior

SEAL

Postal
address:

Telephone: Fax: E-mail:



To be returned to and retained by the Archbishop of Glasgow (marked Private and Confidential).

The Bishop/Religious Superior of Father/Sister has submitted a suitable testimonial letter for this priest/deacon/member of religious congregation to work in this Diocese.

Signed:

(Bishop/Religious Superior) Date:

.....

1.29 Appendix 7: Example of an Incident

Report Form EXAMPLE OF AN INCIDENT

REPORT FORM			
Details of Event and Event Leader		Contact Number	
Name of Child/Vulnerable adult involved		Date of Birth of Child/Vulnerable adult involved (if known)	
Date and Time of Incident			
Place of Incident			
Circumstances of Incident (continue on separate sheet if necessary)			
Names of those present at the incident			

Nature of Injury/Harm			
Treatment Given			
Reported to Whom?			
Other Action Taken			
Signed	Date		
Printed Name		Position	

Appendix 8: Acknowledgement Form To Be Signed By All Staff, Volunteers And SCIAF Travellers



SCIAF'S CODE OF CONDUCT AND CHILD AND VULNERABLE ADULTS SAFEGUARDING POLICY

I,
.....

....., HEARBY ACKNOWLEDGE I HAVE READ,
UNDERSTOOD AND AGREE TO ADHERE TO
SCIAF'S CODE OF
CONDUCT AND CHILD AND VULNERABLE ADULTS SAFEGUARDING POLICY.

Signature:

Date:
.....

..... Please complete and return this form

to Human Resources.

Appendix 9: Reporting Pro Forma

Part One; About You
Name Your role in or relationship with SCIAF Details of any other organisation involved Your relationship to the child or vulnerable adult concerned
Part Two: About the Child/Vulnerable Adult(s)
Name(s) Male/female ? Age Address Who does the child/vulnerable live with? Where is the child/vulnerable adult now? Is s/he in a place of safety? Are there any immediate medical or safety issues?
Part Three: About Your Concern
How did you come to have a concern: was abuse observed or suspected? Was an allegation made? Did a child disclose abuse? What is alleged to have happened?) Date, time and place of any incident(s) Nature of concern/allegation Observations made by you (e.g. child's or vulnerable adults emotional state, any physical evidence) Write down exactly what the child said in their own words and what you said: continue on a separate sheet if necessary. Any other relevant information? (e.g. disability? Language?) Were other children involved or aware? Have you reported to parents or carers or any other child and vulnerable adults safeguarding personnel or Agencies? Time and date of reporting Person(s) to whom report was made Advice given Action taken

Appendix 10: Terms of Reference of Safeguarding Advisory Group

Safeguarding Advisory Group

2. Terms of Reference

1. Introduction:

SCIAF has an organisational office in Glasgow and a Joint office in Ethiopia with our sister agencies CAFOD and Trocaire. SCIAF implements the majority of its overseas work through local partners.

SCIAF works extensively in schools and through parishes and local communities in Scotland. It organises and participates in events and activities for fundraising and campaign purposes in which children are frequently involved alongside SCIAF staff and volunteers.

In recognition of the fact that SCIAF's work brings staff, volunteers and relevant others into contact with children and vulnerable adults, both in Scotland and internationally, a Child and Vulnerable Adults Safeguarding Policy and Procedure was developed by SCIAF with support from a child protection specialist and the National Office for the Protection of Children and Vulnerable Adults (A Commission of the Bishops' Conference of Scotland). The policy was guided by the following documents:

“Awareness and Safety in our Catholic Communities” NOPCVA (2007) and other good practice guidelines for working with children in Scotland.

Caritas Internationalis Child Protection Framework

UN Convention on the Rights of the Child (1989). Article 19.

CAFOD and Save the Children's Child Protection Policies and Procedures.

As the nature of SCIAF's work goes beyond Scotland and our international work falls out with the scope of the Catholic Church in Scotland's approach and guidelines, we were unable to rely solely on their good practice guidelines for working with children in Scotland. Consequently, SCIAF had to expand on the “Awareness and Safety in our Catholic Communities” to ensure the policy and guidelines met international standards, donor requirements and encompassed our overseas work. To guarantee the policy incorporated our international work and at the same time aligned with the Catholic Church in Scotland's approach and guidelines we liaised with the National Coordinator of the Office for the Protection of Children and Vulnerable Adults to develop and finalise the policy. SCIAF will continue to work with National Coordinator to ensure the national standards, policies and guidelines contained in the Awareness and Safety in our Catholic Communities” NOPCVA (2007) and other good practice guidelines for working with children in Scotland are met

2. Purpose and membership

SCIAF's Board of Directors and the Director will be responsible for ensuring the Safeguarding Policy and guidelines within the policy are adhered to. In order to do this, the director established at Safeguarding Advisory Group made up of representatives of the SMT as well as relevant staff members with related expertise and experience in child protection/vulnerable adult issues from across the organisation. The group is overseen by the Director who regularly participates in meetings.

The Safeguarding Advisory Committee comprises of the Head of Integral Human Development, the Head of Central Services, an HR Adviser, and a Schools Officer from COMED and will be responsible for managing safeguarding within the organisation, regularly reviewing and improving systems, policies and procedures that meet recognised safeguarding standards and overseeing the handling of safeguarding cases.

3. Chair

The Head of the Integral Human Development Department will act as Chair.

4. Function of the group

The main responsibilities of the Advisory Group will be as follows:

To review SCIAF's Child and Vulnerable Adults Safeguarding Policy and practices on a regular basis and updating then to ensure that it meets standards and reflects best practice.

To be familiar and conversant with the information contained in SCIAF's Child and Vulnerable Adults Safeguarding Policy and other good practice guidelines for working with children in Scotland such as the "Awareness and Safety in our Catholic Communities" NOPCVA (2007).

To arrange information sessions and training for all staff and volunteers that review and explain the policy as well as share safeguarding and best child and vulnerable adults protection practices and learning.

To display existing resources and develop further resources relating to child protection/vulnerable adults for SCIAF staff and partners.

Ensuring that all personnel within SCIAF are fully aware of how to liaise, consult and working together regarding allegations of abuse.

Overseeing the handling of safeguarding cases and ensuring they are reported appropriately.

Ensuring that recruitment of those who will be working with vulnerable groups is conducted according to current procedures and that all necessary documents are completed prior to any decision to employ.

Liaising with the National Coordinator of the Office for the Protection of Children and Vulnerable Adults for advice when a child protection/vulnerable adult issues arise.

Completing the National Coordinator of the Office for the Protection of Children and Vulnerable Adults annual audit of the implementation of the policies and procedures, actions taken and progress in a timely manner and pass it to and the National Coordinator of the Office for the Protection of Children and Vulnerable Adults

2.1 8 Procedures

8.14 Frequency of meeting

In order to achieve the above, the Advisory Group will meet on a quarterly basis. The committee will meet once a quarter and otherwise if and as necessary. Committee members can consent to a meeting being held at short notice.

8.15 Secretary and Minutes

The HR and Volunteer Co-ordinator will act as Secretary to the Advisory Group and will keep minutes and other records as required.

The HR and Volunteer Co-ordinator will be responsible for calling the meetings, preparing the agenda with input from the Advisory Group members, chairing the meetings and distributing the minutes.

8.16 Reporting

The Advisory Group will also produce and submit a quarterly written report to the SMT on the progress of their work and recommendations for the way forward. The Director will in turn report to the Board of Directors through the notifiable events record.

2.2 ANNEX D: REFERENCE DOCUMENTS

Guiding Documents

The development of SCIAF's Child and Vulnerable Adults safeguarding Policy and Procedures is guided by key documents and is informed by the UN Convention on the Rights of the Child and CAFOD and Save the Children UK's Child and Vulnerable Adults Safeguarding Policies and Procedures:

The Caritas Internationalis Child and Vulnerable Adults Policy Framework: SCIAF is a member of the Caritas International Confederation of official Catholic aid agencies, a global network of 154 Catholic relief, development and social service organisations in 198 countries and territories. The Caritas International Confederation also has a Child and Vulnerable Adults Safeguarding Policy and Code of Conduct, which SCIAF supports;

"Awareness and Safety in our Catholic Communities" NOPCVA (2007) and other good practice guidelines for working with children in Scotland;

UN Convention on the Rights of the Child (1989), Article 19: States Parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse.

From: REDACTED
Sent: 14 February 2018 09:23
To: REDACTED
Cc: REDACTED; REDACTED
Subject: RE: Letter from Dr Allan MSP
Importance: High

Dear REDACTED

Greetings from SCIAF. Just to let you know we will be making a full submission within the next seven days in answer to the letter sent out last night by Dr. Allan in relation to safeguarding issues.

In the meantime, we wanted to reassure you that SCIAF does have robust safeguarding policies and procedures in place which have been approved by our Board of Trustees and conducts compulsory training for all staff on an annual basis.

Since our establishment 50 years ago, we've had two cases reported to us (summary of the two cases attached). We did not report these cases to the Scottish Government but in light of recent events we will ensure we report all cases in future.

Will get back to you with a fuller more detailed submission within the next week.

Sincerely,
REDACTED

From: REDACTED on behalf of REDACTED
Sent: 13 February 2018 20:22
To: REDACTED
Subject: Letter from Dr Allan MSP

Please note that the Scottish Government intends making the fact that we have written to all originations currently receiving Scottish Government funding from either our International Development Fund or Climate Justice Fund regarding this matter public. We shall also be publishing the contents of this letter on the Scottish Government website.

REDACTED, REDACTED
Office of Dr Alasdair Allan, MSP, Minister for International Development and Europe

Scottish Government, REDACTED, St Andrew's House, Regent Road, Edinburgh, EH1 3DG
0131 244 REDACTED | MinisterIDE@gov.scot | www.gov.scot

Report of a Notifiable Event – REDACTED Case

Context/Location

REDACTED opened a REDACTED in REDACTED of REDACTED in the second year (REDACTED) of the REDACTED Programme. This programme was funded by REDACTED and SCIAF. REDACTED appointed twenty volunteers in ten different REDACTED of REDACTED of REDACTED.

Incident

In early REDACTED, a REDACTED in one of the REDACTED REDACTED was accused of entering the home of a neighbour and REDACTED a REDACTED REDACTED REDACTED REDACTED (REDACTED REDACTED REDACTED REDACTED) who was home alone. They were known to each other for many years. This REDACTED was not a programme participant (beneficiary) and in no way associated with the REDACTED Programme, although after this incident REDACTED did receive services as outlined below.

A different REDACTED with the project heard of the incident, informed REDACTED REDACTED about it, and REDACTED advised the REDACTED of the REDACTED to file a police complaint. She did so on REDACTED

The police arrested the REDACTED accused of the act on the REDACTED and released him about a week to 10 days afterwards. The case was left in the hands of the REDACTED. There was no past history/record of the REDACTED committing any such acts in the past.

Action taken – Partner REDACTED

REDACTED immediately suspended the suspect from REDACTED with them. The REDACTED supervisor visited and met the REDACTED and REDACTED REDACTED thrice and counselled them. Legal advice and support was given to the family. The police informed REDACTED that the case had been referred to the Public Prosecutor, but no further news was received, despite several requests.

Action taken – SCIAF

At the end of July a SCIAF Programme Manager visited the region. REDACTED was informed by a third party about the incident. On REDACTED he emailed the SCIAF REDACTED, who then contacted the REDACTED of REDACTED to ask for more information on the case, and to request that it be followed up carefully and also that all such incidents be communicated in future.

SCIAF REDACTED REDACTED maintained regular contact with the partner during this period to ensure case being followed up, and informed the REDACTED of the incident.

REDACTED REDACTED did not have a Child Protection policy at the time of this incidence. We organised Child Protection training for all our REDACTED REDACTED partners at REDACTED, REDACTED from REDACTED to REDACTED REDACTED REDACTED. Now all our REDACTED partners have a Child Protection policy.

Our partnership with REDACTED came to an end on REDACTED.

Report of a Notifiable Event – REDACTED Case

Context/Location

REDACTED runs joint international development projects in REDACTED with SCIAF (Scotland) and REDACTED (REDACTED). Our office (the REDACTED) is based in REDACTED. REDACTED has responsibility for the HR aspects of the joint programme.

Incident

We were informed by a member of staff that one of our REDACTED had been arrested for REDACTED REDACTED REDACTED REDACTED. It is alleged, at the time of the arrest, that this was not the first occasion this had happened.

The individual denies the police allegation and is currently on police bail

Note: the REDACTED is **not** associated with either REDACTED's partners or beneficiary communities.

Action taken - REDACTED

Following legal advice from two REDACTED lawyers, we undertook an internal investigation which revealed an incident *had* occurred during working hours whilst the staff member was using the REDACTED vehicle on REDACTED business. However, the individual claims that REDACTED interaction with the REDACTED was not of a sexual nature. The investigation concluded that, notwithstanding the specific police allegation, a serious breach of REDACTED's Code of Behaviour (which includes specific references to our Safeguarding Policy) had occurred. As a result, the individual was dismissed for Gross Misconduct. In REDACTED REDACTED lawyer sent a letter claiming compensation for unfair dismissal. The office responded with a lawyer's letter rejecting the claim. No further correspondence has been received, and no references given.

REDACTED have since undertaken a number of additional actions to provide assurance that:

- a. there have been no further breaches of REDACTED's Code of Behaviour by other members of staff (relating to delays following REDACTED's reporting procedures for safeguarding incidents)
- b. there have been no safeguarding incidents relating to our partners or beneficiary communities (none have been reported to date)
- c. our Safeguarding policies and the impact of non-compliance are fully understood, particularly in the REDACTED office.

As yet there has been no publicity resulting from this incident but the case has yet to come to court. REDACTED has a prepared a draft statement, should it be required.

The incident is logged, monitored and maintained confidentially in REDACTED's Complaints Management System.

Action taken - REDACTED

SCIAF's Board of Trustees were informed of this case and subsequent developments on a regular basis.

SCIAF monitored the actions of REDACTED and the REDACTED office closely, and a SCIAF Manager was involved in an internal review by REDACTED and the REDACTED Office of the handling of the case.

SCIAF commissioned an independent expert to review our handling of this case and our Safeguarding Policy and Procedures in general. The report commended SCIAF's handling of the case, but drew out some lessons for further improvement to policy and procedures which are being implemented.

4. Mary's Meals

Dear REDACTED,

In response to the below email from the office of Dr Allan, please find attached a statement of assurance on safeguarding from Mary's Meals.

Please do let me know if you have any comments or questions.

With best wishes and sincere thanks,
REDACTED

REDACTED | REDACTED, Mary's Meals UK
T: +44 (0)141 345REDACTED | M: REDACTED

Mary's Meals provides a safe and trusted environment which safeguards all those the organisation has contact with, including beneficiaries, staff and volunteers.

In line with our Statement of Values and Code of Conduct, Mary's Meals takes the issue of safeguarding extremely seriously and is committed to ensuring that abusive behaviour is not tolerated within our organisation.

Respecting and upholding the dignity and safety of all those involved in our mission – including our staff, volunteers, the children who receive our meals, and the wider communities in which we work – is central to everything Mary's Meals does.

Mary's Meals has robust safeguarding policies and procedures in operation to protect vulnerable people and we are committed to continually reviewing and improving our approach, so that the strongest possible safeguarding practices are in place.

Key to our approach in this area is our Safeguarding Children Policy and our Code of Conduct. These core policy documents outline clear guidelines and standards of personal and professional behaviour which all employees, volunteers and project partners must uphold.

The Safeguarding Children Policy and Code of Conduct are grounded in Mary's Meals' key founding organisational values:

- We have confidence in the innate goodness of people.
- We respect the dignity of every human being and family life.
- We believe in good stewardship of the resources entrusted to us.

It is of the utmost importance to Mary's Meals that we maintain an environment which fosters trust, dignity and respect and is positive, safe, enjoyable and free from harassment and discrimination.

Mary's Meals promotes an organisational culture that prioritises safeguarding, so that it is safe for those affected to come forward, and to report incidents and concerns with the assurance they will be handled sensitively and properly.

Mary's Meals is committed to an organisational culture which prioritises safeguarding and promotes a fair and harmonious working environment in which everyone is treated with respect and dignity.

Mary's Meals believes it is essential that the children we seek to support are protected from harm and can benefit fully from our programmes, and we work with the communities, schools and governments in the countries in which we work to support them to provide a safe, healthy and relaxed environment.

We will not tolerate any violation or infringement of the rights of the child and we strive to ensure that the needs, dignity and safety of all children, regardless of gender, ethnicity, faith, ability or culture, are always at the heart of our programmes.

Our Safeguarding Children Policy includes the following principles:

Children should always feel empowered to raise and discuss any issues or concerns and should always be listened to.

- Any allegations of any form of abuse should always be treated seriously and appropriately and promptly dealt with.
- Victims and other involved parties should always be supported and perpetrators must always be held to account.
- Investigation of any concerns regarding the allegations of harm or abuse of a child should always be conducted with reference to national laws and employment rights and immediately referred to any relevant statutory authorities where appropriate.
- Any allegations and concerns relating to our staff and partners in this crucial area are reported centrally to the Chief Operating Officer and any allegations will be fully investigated.

Our Harassment and Bullying Policy is also aimed at encouraging a culture where staff feel safe and valued and, in the event that policies or procedures are not adhered to, there are further policies to ensure a fair, transparent and legally-compliant process to address this. Key to this is the Disciplinary Policy, which provides clear guidance on Mary's Meals' disciplinary procedures to ensure that all disciplinary matters are dealt with promptly, fairly, and with consistency.

The Safeguarding Children Policy is approved by the Board of Directors and compliance with the Policy is mandatory for all trustees, employees and volunteers. Its fundamental purpose is to provide protection from harm, primarily to children, but also to Mary's Meals staff, volunteers, and the organisation itself.

Where Mary's Meals works with partner organisations, all programme partners sign a Partner Agreement with Mary's Meals International. As part of this agreement, programme partners are provided with a copy of our Safeguarding Policy and are required to comply with and promote the policy. They are also required to train their staff and volunteers on the correct implementation of this policy.

Mary's Meals has robust safeguarding policies, procedures and measures to protect people and these are shared and understood.

We have a clear Safeguarding Policy and robust procedures and measures in place, which are shared and understood across the organisation. In addition to the Safeguarding Policy and Code of Conduct, our global Human Resources policies for

recruitment, induction, staff development and training, performance management, whistle-blowing, complaints and investigations are also designed with the protection of children and other vulnerable people in mind.

We are committed to living our values and strong recruitment, onboarding and training practices are in place. Volunteer Scotland Disclosure Services manages disclosure checks for Mary's Meals, under the Protected Vulnerable Group scheme, where it undertakes checks on any new employee who will be undertaking 'regulated work'. This provides us with an assurance that we do not employ any UK nationals who are barred from undertaking 'regulated work'. Where we employ non-UK nationals, a police check is required.

As part of our onboarding process, all staff are provided with a copy of the staff handbook to ensure they fully understand our vision, values, Code of Conduct and safeguarding policies and procedures. There is a requirement that staff read and confirm understanding of our policies as part of this process. A particular focus is on ensuring understanding of the Code of Conduct and our Safeguarding Children Policy and procedures.

Mary's Meals also operates a probationary process. This provides an additional safeguard whereby staff may be exited within the first three months where we believe they do not reach the technical requirements and / or do not demonstrate behaviours and attitudes expected of a Mary's Meals employee.

Mary's Meals has absolute clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities and partners.

Any allegations or concerns relating to our staff and partners are reported centrally to the Chief Operating Officer and are fully investigated, with legal advice being sought as is necessary. Any concerns about actual or suspected abuse are reported to the appropriate authorities and would also be reported, as is appropriate, to the Office of the Scottish Charity Regulator and funding partners.

As a learning organisation, we also regularly review and update our policies and practices, to ensure they remain compliant with legislation and best practice.

Mary's Meals takes its obligation to ensure no children are exposed to risk of harm and abuse seriously. We have systems and processes in place for reporting (including whistleblowing), and any concerns we have about children's safety within the communities in which we work are taken seriously, and decisive action is taken.

Our supporters and funding partners will be reassured to know that Mary's Meals has had no reported incidents of misconduct involving children.

In 2017, we investigated one incidence of an REDACTED between REDACTED REDACTED REDACTED; a REDACTED REDACTED REDACTED of REDACTED, from one of the countries in which we work, and a REDACTED REDACTED.

Although no crime was committed, no minors were involved and the REDACTED REDACTED did not occur while carrying out the charity's activities, the REDACTED REDACTED actions were in breach of our Code of Conduct, which sets high standards for all those involved in our mission. The REDACTED was dismissed promptly after the REDACTED was reported.

The work of Mary's Meals is made possible by the kindness and goodness of many people all over the world – who refuse to accept that any child should go hungry in this world of plenty – and, together, we are committed to reaching more and more hungry children with a nutritious daily meal in school.

