



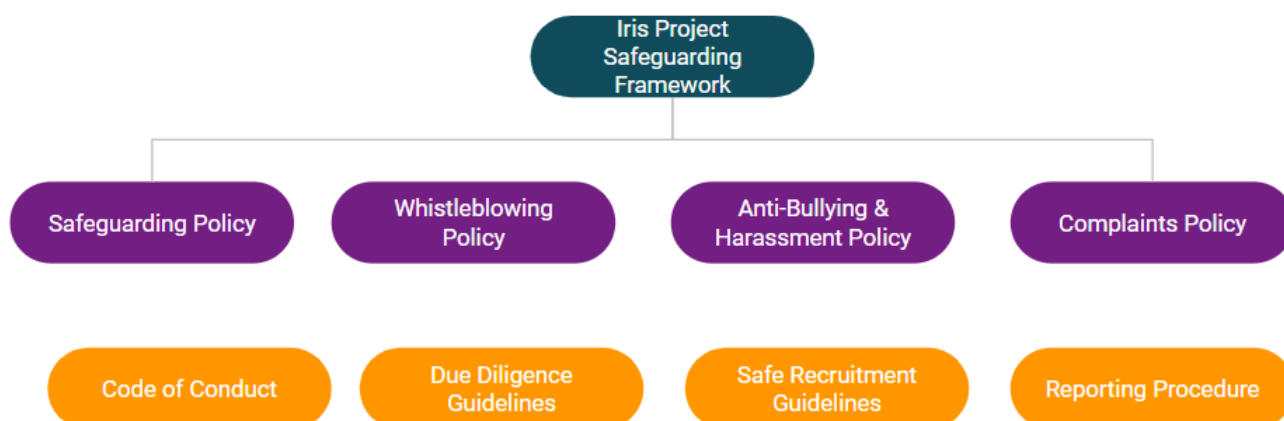
The Iris Project Safeguarding Policy¹

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Document Version	1.0
Applies to	All staff, consultants, volunteers, advisors, prize winners
Created and approved by	Karen Hatch (Open Briefing consultant)
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Safeguarding Framework

This document is part of The Iris Project's Safeguarding Framework that consists of this policy, procedures and resources.



Purpose

The Iris Project believes that the health, welfare and safety of children, young people and at-risk adults is paramount, and that all people, without exception, have a human right to be protected from harm and abuse of any kind regardless of age, gender, gender identity, gender expression, ethnicity, race, colour, national identity, national origin, physical or mental disability, sexuality, sexual orientation, lifestyle, family make-up, marital status, pregnancy or parental status, medical condition, genetic information, religion or beliefs. We are committed to protecting all children, young people and at-risk adults that may come into contact with The Iris Project. We are also committed to ensuring that all staff are protected from any forms of bullying, harassment, sexual harassment, discrimination and abuse of power.

¹ Adapted from Bond's Safeguarding Policy <https://www.bond.org.uk/resources/safeguarding-policy-templates/>

The purpose of this policy is to protect people, particularly children, youth, and at risk adults, from any harm that may be caused due to their coming into contact with The Iris Project. This includes harm arising from:

- The conduct of staff or personnel associated with The Iris Project
- The design and implementation of The Iris Project's programmes and activities

The policy lays out the commitments made by The Iris Project, and informs staff and associated personnel³ of their responsibilities in relation to safeguarding.

- Sexual harassment, bullying and harassment in the workplace are addressed through The Iris Project's Anti Bullying and Harassment Policy.
- Safeguarding concerns in the wider community that are not caused by The Iris Project or associated personnel should still be reported where they come to our attention through our work. The Safeguarding Reporting Procedure will guide whether and how the concern should be referred or responded to.

What is safeguarding?

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially at-risk adults and children, from that harm, and to respond appropriately when harm does occur.

Further definitions relating to safeguarding are provided in the glossary below.

Scope

This policy applies to:

- All staff contracted by The Iris Project
- Consultants, volunteers, advisors, mentors and Steering Committee members
- Prize winners, grantees and programme participants while engaging with The Iris Project
- Contractors, suppliers and delivery partners where their work brings them into contact with The Iris Project's community
- Programme visitors and external participants, including journalists, photographers, filmmakers, celebrities, politicians and other guests

The policy applies during activities carried out on behalf of The Iris Project, including online engagement, travel, events, workshops, mentoring, communications and storytelling activities.

Policy Statement

The Iris Project believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. The Iris Project will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. Please see the Anti Bullying and Harassment Policy for more information on bullying and harassment.

The Iris Project commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

Prevention

The Iris Project responsibilities

The Iris Project will:

- Ensure all staff and associated personnel have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with The Iris Project. This includes the way in which information about individuals in our programmes is gathered and communicated
- Implement stringent safeguarding procedures when recruiting and managing staff and associated personnel
- Ensure staff and associated personnel receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process

Staff responsibilities

Child safeguarding

The Iris Project staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding

The Iris Project staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

Protection from sexual exploitation and abuse

The Iris Project staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, The Iris Project staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any safeguarding concern or suspicion connected to The Iris Project's work or community, regardless of who is alleged to have caused the harm. Concerns should be

reported promptly, even where information is incomplete or the person reporting is unsure whether a safeguarding breach has occurred.

- Anyone raising a safeguarding concern in good faith will be protected from retaliation, victimisation or negative repercussions.

Enabling reports

The Iris Project will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by The Iris Project's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy. No person should experience retaliation, victimisation or disadvantage for raising a safeguarding concern in good faith, whether or not the concern is ultimately substantiated.

The Iris Project will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Anyone who has a complaint or concern relating to safeguarding at The Iris Project should report it immediately to the Safeguarding Focal Point.

If they do not feel comfortable reporting to the Safeguarding Focal Point, including where that person may be implicated in the concern, they may report to the designated Steering Committee safeguarding contact.

If both of these routes are inappropriate, unavailable or implicated, the concern should be reported directly to Global Fund for Children's safeguarding team.

No individual who is directly involved in or implicated in a safeguarding concern should lead decisions about the response.

Safeguarding Focal Point details:

Frances Storey

Email: frances@theirisproject.org

Steering Committee member details:

Hannah Dillon

Email: hannah@theirisproject.org

Director of safeguarding at Global Fund for Children

Heather McDaid / safeguarding team

safeguarding@globalfundforchildren.org

Response

The Iris Project will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns in the Safeguarding Reporting Procedure).

The Iris Project will apply appropriate disciplinary measures to staff found in breach of policy.

The Iris Project will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

Where appropriate, immediate support may include wellbeing or psychosocial support, medical assistance, legal support, security support or other practical assistance.

Support should not depend on the outcome of an investigation and, wherever possible, decisions about support should be led by the person affected.

The Iris Project will also assess whether there are any legal, regulatory, funder, governance or statutory reporting requirements arising from a safeguarding concern.

Any external reporting should be handled carefully, with consideration given to confidentiality, consent and whether referral could create additional risk for the people involved.

Where a safeguarding concern also involves physical, legal, digital or political security risks, The Iris Project should seek appropriate specialist advice, including from Open Briefing where relevant.

Once the immediate response has concluded, The Iris Project should consider whether any learning from the incident requires changes to policy, practice, risk assessments, training or programme design.

Any organisational learning or reporting should protect the confidentiality and identity of the people involved.

Confidentiality

Confidentiality must be maintained at all stages when dealing with safeguarding concerns.

Information relating to a concern and subsequent case management should be shared on a need-to-know basis only and stored securely in a restricted-access location.

Sensitive safeguarding information should not be shared through general team Slack channels, broad email threads or other unrestricted systems.

Information should be handled in line with applicable data protection requirements and retained only for as long as necessary under The Iris Project's policies and legal obligations.

Risk Assessment

All roles, activities and projects will be risk assessed by Open Briefing consultants in order to ensure safeguarding risks are being mitigated and addressed. Risk assessments will include:

1. Roles: all roles will be risk assessed for level of contact with children and at-risk adults
2. Activities: all activities and projects will be risk assessed. High risk projects will include those that involve contact with children and/or at-risk adults and mitigations will be developed to reduce the safeguarding risk.

3. Prize winners: A safeguarding risk assessment will be completed prior to any prizes being given out to ensure any risk is mitigated.

Risk assessments should be reviewed and updated where circumstances change, new risks emerge or an incident indicates that existing mitigations are no longer sufficient.

Associated policies and procedures

1. Code of Conduct
2. Anti Bullying and Harassment policy
3. Disclosure of Malpractice in the Workplace (Whistleblower) policy
4. Complaints Policy
5. Reporting Procedure
6. Safe recruitment guidelines
7. Due Diligence guidelines
8. Safeguarding Prize Winners Under 18 Procedure
9. [Incident & Crisis Response Plan](#) — where a safeguarding incident also creates communications, reputational, political or security risks, this plan should be followed alongside the Safeguarding Policy and Reporting Procedure. Safeguarding procedures take precedence for safeguarding decisions.

Safeguarding Prize Winners Under the Age of 18

The Iris Project recognises that additional safeguards are required when working with anyone under the age of 18.

Where a safeguarding concern involves anyone under 18, safeguarding expert advice should be sought immediately before further action is taken.

Where a prize winner is under 18, The Iris Project will follow the [Safeguarding Prize Winners Under 18 Procedure](#), which sets out the additional requirements relating to risk assessment, consent, meetings, distribution of funds, safeguarding training, ongoing check-ins and due diligence with external organisations.

The safety and best interests of the young person should guide all decisions.

Glossary of Terms

Beneficiary of Assistance

Someone who directly receives goods or services from The Iris Project's programme. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect⁴

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult

⁴ NHS 'What is Safeguarding? Easy Read' 2011

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care 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.