

Safeguarding Policy

Protection of at-risk individuals

July 2025

Document History

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1. Purpose

- 1.1. The purpose of this policy is to outline Cenfri's commitment to safeguarding, inform staff or associated personnel¹ of their responsibilities, and set out the procedures we will follow to uphold it.
- 1.2. Cenfri is committed to creating and maintaining an environment that promotes the safety and well-being of everyone we work with and prevents harm, exploitation and abuse that may be caused by their contact with Cenfri. Our policies are particularly aimed at safeguarding children, youth and vulnerable or at-risk adults. This includes harm arising from:
 - 1.2.1. The conduct of staff or personnel associated with Cenfri.
 - 1.2.2. The design and implementation of Cenfri's programmes and activities.
- 1.3. This policy does not cover:
 - 1.3.1. Sexual harassment in the workplace – this is dealt with under Cenfri's Harassment Policy².
 - 1.3.2. Safeguarding concerns in the wider community not perpetrated by Cenfri or associated personnel.

2. Scope

This policy applies to all Cenfri led activities regardless of location implemented by contracted staff or associated personnel (comprising sub-contractors and their employees or associated personnel).

3. Policy Statement

- 3.1. Cenfri 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. Cenfri will not tolerate abuse and exploitation by staff or associated personnel.

¹ See 'Scope' for definition of associated personnel

²Some NGOs are now including workplace bullying and harassment in their safeguarding portfolio, as it relates to harm caused by coming into contact with our staff or programmes. However accompanying procedures for dealing with workplace bullying and harassment are likely to be different, due to legal and statutory differences in handling workplace incidents

- 3.2. This policy will address the following areas of safeguarding: child, youth and adult safeguarding, modern day slavery, human rights abuse and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Section 9 - Associated Policies).
- 3.3. Cenfri commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

4. Guiding Principles

- 4.1. Acting in the best interest of those we seek to help.
- 4.2. Zero tolerance for abuse and exploitation.
- 4.3. Empowering people to report concerns safely and confidentially.
- 4.4. Ensuring safeguarding is integrated into all areas of our work.

5. Prevention

- 5.1. Cenfri responsibilities:
 - 5.1.1. Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
 - 5.1.2. 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 Cenfri. This includes the way in which information about individuals in our programmes is gathered and communicated.
 - 5.1.3. Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
 - 5.1.4. Ensure staff receive training on safeguarding at a level commensurate with their role in the organization.
 - 5.1.5. Follow up on reports of safeguarding concerns promptly and according to due process.
- 5.2. Staff and associated personnel responsibilities in implementing Cenfri led activities:
 - 5.2.1. Cenfri Directors are responsible for policy oversight, risk management and resourcing safeguarding practices.
 - 5.2.2. *Safeguarding:* Cenfri staff and associated personnel must not:
 - Engage in sexual activity with anyone under the age of 18

- Sexually abuse or exploit children, youth or at-risk adults
 - Subject a child, youth or an at-risk adult to physical, emotional or psychological abuse, or neglect
 - Engage in any commercially exploitative activities with children including child labour or trafficking
- 5.2.3. *Protection from sexual exploitation and abuse:* Cenfri 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
- 5.2.4. Additionally, Cenfri 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 concerns or suspicions regarding safeguarding violations by a Cenfri staff member or associated personnel to the appropriate staff member
- 5.3. Enabling Reports:
- 5.3.1. Cenfri will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.
- 5.3.2. Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Cenfri's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.
- 5.3.3. Cenfri will also accept complaints from external sources such as members of the public, partners and official bodies.

6. Reporting procedures

Staff members who have a complaint or concern relating to safeguarding should follow the procedure below:

- 6.1. Raise the matter immediately with your line manager, who will consult with the appropriate contact point. If you feel that you are unable to raise the matter with your line manager (for example if you feel that the report will not be taken seriously, or if that person is implicated in the concern), and you are able to, raise it with a more senior manager and the HR Manager.
- 6.2. At the point of raising a concern it would be useful for you to share information describing:

- 6.2.1. Whether anyone is at immediate risk of harm or potential future harm?
- 6.2.2. What happened? If possible, make note of dates, times, places, people.
- 6.2.3. Who is involved?
- 6.2.4. How do you know about it?
- 6.2.5. When were you first concerned about it?
- 6.2.6. Have you told anybody about it?
- 6.2.7. Was any action taken?
- 6.3. Upon receiving a safeguarding concern, all managers should:
 - 6.3.1. Report safeguarding concerns immediately to the Director of Insights and Operations, unless there is concern that this Director may be involved in the matter in which case the matter should be reported to the MD.
- 6.4. A decision will be made on whether it is appropriate to handle such concerns under this policy. Where not appropriate the complainant will be informed and their permission sought to divert the issue to the appropriate company procedure.
- 6.5. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.
- 6.6. Complainants will be notified once the matter has been resolved, but outcomes are subject to confidentiality and may not be communicated.

7. Response

- 7.1. Cenfri 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 Associated Policies).
- 7.2. Reported breaches of the safeguarding policy and related responses are reported to the Risk, Audit and Governance Committee of the Cenfri Board as well as to the Human Resources and Remuneration Committee where violations were perpetrated by or against Cenfri employees.
- 7.3. Breaches of the policy will result in disciplinary measures for related staff and can result in termination of contract for sub-contractors as well as damages where relevant .
- 7.4. Cenfri will take appropriate action, which may include dismissal or termination of contract, against any staff or associated personnel who:
 - 7.4.1. Has been found to be victimising another individual for using this procedure or deterring them from reporting genuine concerns under it.

- 7.4.2. Made a disclosure maliciously that is known to be untrue or without reasonable grounds for believing that the information supplied was accurate.

8. Confidentiality

- 8.1. It is essential that confidentiality and data protection is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times.

9. Associated Policies

- 9.1. Code of Conduct
- 9.2. Harassment policy
- 9.3. Disclosure of Malpractice in the Workplace (Whistleblower) policy
- 9.4. Disciplinary Code and Grievance Policy
- 9.5. Code of Ethics
- 9.6. Recruitment Policy (specifically with reference to background checks)
- 9.7. Data Protection and Privacy Policy

10. Definitions

- 10.1. **Abuse:** A violation of an individual's human and civil rights by any other person or persons. This includes physical, emotional, sexual abuse, neglect, exploitation, and bullying.
- 10.2. **Beneficiary of Assistance:** Someone who directly receives goods or services from Cenfri'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.
- 10.3. **Child:** A person below the age of 18
- 10.4. **Youth:** A person between the ages of 18 and 35
- 10.5. **Harm:** Psychological, physical and any other infringement of an individual's rights
- 10.6. **Modern day slavery:** When an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage.
- 10.7. **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
- 10.8. **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)
- 10.9. **Safeguarding:** In our sector, we understand it to mean protecting people, including children, youth and at-risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:
 - 10.9.1. Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults, youth and children, from that harm; and to respond appropriately when harm does occur.
 - 10.9.2. 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.
 - 10.9.3. 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.

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

10.10. **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.

10.11. **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.

10.12. **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.

10.13. **Vulnerable/ at risk adult:** An adult at greater risk of being harmed and/ or who is or may be in need of care by reason of mental or other disability, age, illness, or power balance; 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.