
Reporting safeguarding concerns

OPM places a **mandatory obligation on all staff** (whether permanent or temporary, Directors, subcontractors, consultants, volunteers or anyone working on behalf of OPM) **and contractors** to immediately report any concerns, suspicions, allegations and incidents that indicate actual or potential abuse of vulnerable people that they come across during their work with OPM.

You should follow **OPM's '4R's' approach to reporting safeguarding issues:**

- ▣ **Recognise** (understand how to recognise an issue, for example you hear about something, you notice an injury, someone tells you something)
- ▣ **Respond** (listen calmly, don't react with anger or disbelief, don't promise to keep everything a secret, use open not leading questions)
- ▣ **Record** (as soon as possible after the disclosure)
- ▣ **Report** (make sure that the reporting procedure set out in this document is followed and that everyone involved knows that the organisation has a clear mechanism for follow up)

Who can make an internal report?

Anyone can report a Safeguarding concern i.e. Staff, Supplier or member of the public (including clients and their personnel etc.).

What to report

All concerns, suspicions, allegations and incidents that indicate actual or potential Harm of Vulnerable Persons that you come across during your work with OPM must be reported. Expected standards of behaviour are set out in Appendix 3 and our Safeguarding Policy and Principles of Practice.

Who is a 'Vulnerable Person'?

- a) All children and young people **under the age of 18** wherever situated anywhere in the world; or
- b) Any person who may reasonably be considered vulnerable by reason of age or physical or mental disability or other relevant circumstances (which can include an imbalance of power).

When to report

It is important that Staff and Suppliers **immediately** report – and within 24 hours - any concerns they may have regarding the safety and welfare of a Vulnerable Person in respect of whom they have a Safeguarding concern as a result of direct or indirect contact.

How to report

- 1) Report your concern to your line manager/OPM lead contact, usually your direct line manager or project manager, via:
 - a. Email;
 - b. Telephone/skype;
 - c. In person.

Reports made via telephone, Skype, email or in person, should be followed up by completion and submission of an Incident Reporting Form (see Appendix 2) as soon as possible. Fill in the form in Appendix 2 as accurately and completely as you can and submit it to your line manager/OPM lead contact. If this is not immediately possible, take comprehensive notes and fill in the form within 24 hours from reporting the incident and submit it to your line manager/OPM lead contact.

Confidentiality - It is important to reassure the alleged victim or the person disclosing the incident that their allegation/claim will be kept confidential on a **'need to know' basis**. This means that we will keep the information confidential and only share with a limited number of people in our organisation subject to any requirement for us to report it to relevant local authorities or our client. The safety and wellbeing of the Vulnerable Person is the paramount consideration. Upon receiving an allegation, you should avoid discussing it with anyone beyond your line manager/OPM lead contact. You cannot commit to keeping a matter confidential where to do so would put you or OPM in breach of the law. You should ask your OPM contact to seek the advice of the General Counsel or Head of Risk and Compliance to raise any concerns that you have in this regard.

If for whatever reason you are concerned about reporting and are not inclined to report to your line manager/OPM lead contact in the way described, **you can raise your concern through OPM's whistleblowing mechanism by:**

Your report can be made confidentially using any of the following external mechanisms:

- Calling the whistleblowing hotline number for your location (available on OPM's intranet and website)
- Calling OPM's external whistleblowing hotline from the UK on 0800 890 011 followed by 833-945-3461 when prompted
- Completing the web reporting form at opml.ethicspoint.com
- Emailing or calling the client's reporting mechanism e.g. for UK FCDO, the Counter Fraud and Whistleblowing Unit (CFWU) at reportingconcerns@fcdo.gov.uk or on +44(0)1355 843747

2) Emergency Action

If you think the matter is urgent and requires immediate action outside of standard business hours, for example, you suspect that a Vulnerable Person is in immediate danger of abuse

you may contact the OPM **Crisis Incident Management Team**, who will make any critical decisions to guide the person making the report. The Crisis Incident Management Team can be contacted by calling the OPM Emergency Line on: +441159577304 or by emailing the Global Security Manager at Charles.watt@opml.co.uk

More details on how to contact the Crisis Incident Management Team can be found here: <https://opml.sharepoint.com/resources/travelandsecurity/SitePages/Emergency%20Contacts.aspx>

The safety and wellbeing of the Vulnerable Person is the paramount consideration and immediate steps should be taken as necessary to protect them.

3) Steps of the reporting process

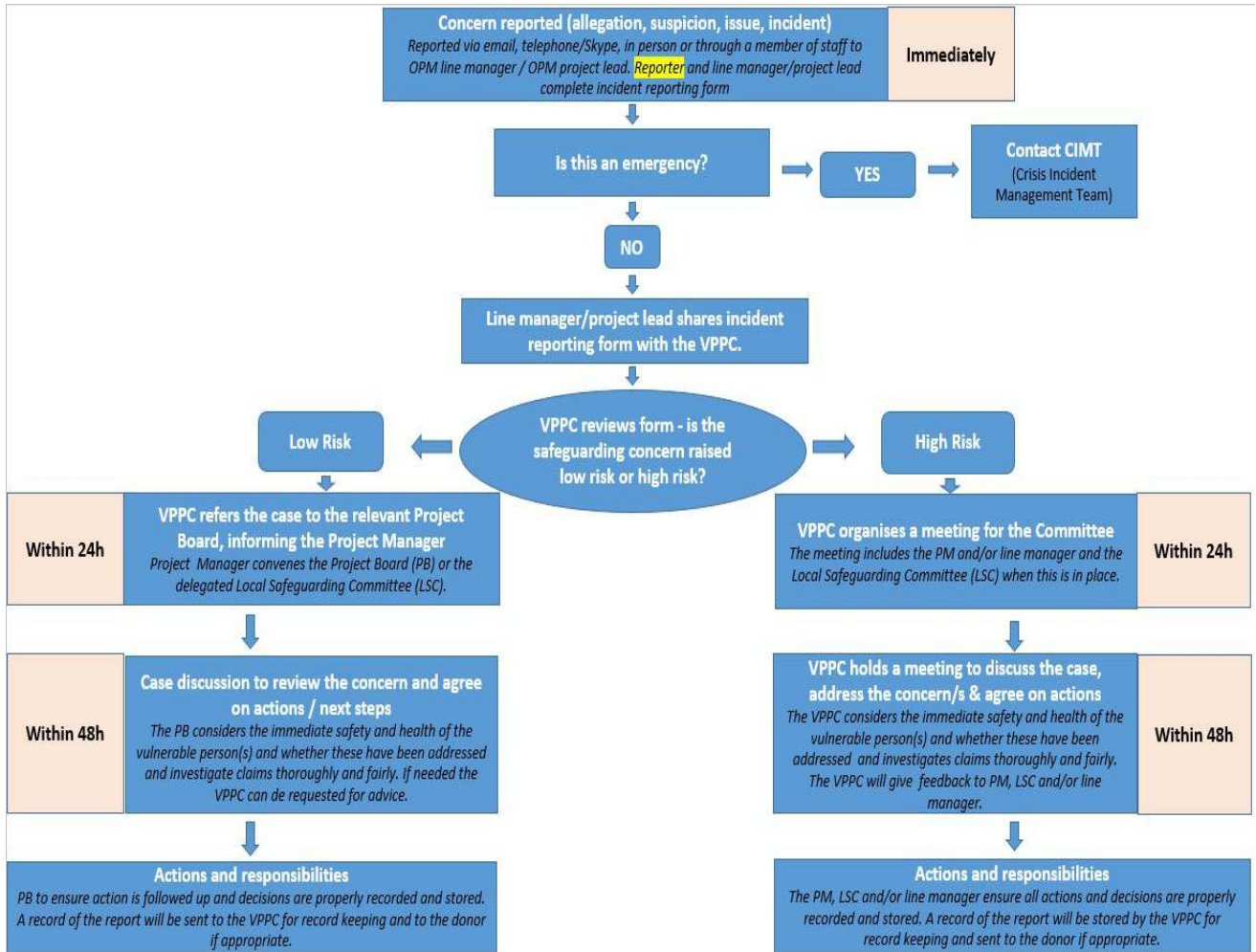
A. Your line manager/OPM project lead will submit the incident reporting form to the OPM Vulnerable Persons Protection Committee (**VPPC, See appendix 1**) (safeguarding@opml.co.uk) and the process detailed in the chart below will be followed.

B. If the concern raised was related to a project context:

The VPPC, will work together with the project board and, if applicable, the project local safeguarding committee (LSC)¹⁶ and will follow up and investigate claims thoroughly and fairly. A case discussion involving the VPPC, the LSC (when applicable), the project board and other relevant colleagues will be held as a matter of urgency, and ideally within 24 hours from receiving the report (or the following Monday if this is in the weekend) to discuss the nature of the case and to take decisions on next steps. A concern relating to issues in a partner organisation should also be referred to the VPPC. Where applicable, the VPPC will notify the client and the designated Vulnerable Person Protection contact person of any partner organisation concerned.

C. If the safeguarding concern was unrelated to a project context, the line manager shall report the concern to the VPPC which will organise a case discussion to take place within 48 hours. The VPPC will also provide advice on next steps to be taken.

¹ In some instances, the project will have a bespoke local safeguarding committee (LSC) to receive and discuss safeguarding concerns. The local delegated committee could consist of the project manager, team leader, representative of the donor and a representative of a relevant local organisation (child rights organisation for instance). The LSC should also be convened by the Project Manager within 24h or the following Monday if this is in the weekend.



APPENDIX I

VPPC

overview

The OPM Vulnerable Persons Protection Committee

The purpose of the committee is to ensure that any cases of Vulnerable Person Harm, abuse or exploitation reported to or against OPM staff and contractors are duly handled following OPM's Safeguarding Policy. The safety and wellbeing of the Vulnerable Person is the paramount consideration. The committee assists project boards with guidance when a safeguarding incident has been reported.

The main responsibilities of the committee are:

- i. Review case information received from the relevant project board or other sources in the case of non-project related Safeguarding concerns.
- ii. Provide immediate guidance about what actions to take and follow-up to ensure adequate handling of the case.
- iii. Initiate investigation procedures in line with the Issues and Concerns Reporting and Management Policy or, if appropriate engage an external investigator, when allegations of abuse or misconduct are brought against OPM staff or contractors and provide guidance on when the staff or contractor should be immediately suspended or disengaged from work / providing services to OPM pending the outcome of the investigation.
- iv. Wherever appropriate – and this will vary from country to country - give guidance on reporting the incident to national authorities, including the police, if there are indications that a crime has or may have been committed against a Vulnerable Person.
- v. Seek advice from the OPM Ethical Review Committee and/or the Global Security Manager if appropriate.
- vi. Seek external advice as and when deemed necessary. Specialist advice may be sought by the Committee from Keeping Children Safe of which OPM is a member or another party.
- vii. Make sure OPM's contractual obligations towards the donor / client are met.
- viii. Where OPM is responsible, ensure adequate support is provided to the victim including legal and psychosocial support as appropriate.
- ix. Maintain detailed written documentation of all steps taken by the VPPC from receiving an allegation or case, to when it is closed. Store all documentation centrally on a designated space on IMO, which is solely accessible to the members of the Committee.

APPENDIX 2*Incident Reporting Form***PART 1: About you**

You do not have to include your personal information, if you do not wish to but withholding this information will affect OPM's ability to investigate the concern

Name:

Email address:

Phone number:

Your role in or relationship to OPM:

Details of any other organisation involved:

Your relationship to the Vulnerable Person(s):

PART 2: About the Vulnerable Person

Include as much information as you can regarding the Vulnerable Person if this is known, if not leave blank

Name(s)

Male/female?

Age:

Address/location:

Email address:

Phone number:

Who does the vulnerable person live with?

PART 3: About Your Concern

How did you come to have a concern:
(Was abuse observed or suspected? Was an allegation made? Did a vulnerable person disclose abuse?)

Date, time and place of any incident(s):

Nature of concern/allegation:

Observations made by you:

(e.g. vulnerable person's emotional state, any physical evidence)

Write down exactly – or as precisely as you can remember - what the vulnerable person said and what you said: continue on a separate sheet if necessary:

Any other relevant information:

(E.g. disability? language? Were other people involved or aware?)

Have you reported the incident to parents or carers of the Vulnerable Person or any other staff in OPM or other external parties?

If yes to whom and how. Kindly provide relevant details:

What action do you think should be taken by now by the project board?

For the OPM Project Manager/Line Manager use only:

Time and date of reporting:

Person(s) to whom report was made:

Advice given:

Action taken:

APPENDIX 3

Guidance on types of abuse and expected standards of behaviour

Vulnerable people have no/less capacity to prevent, resist or avoid potential risks and their impacts, which can include violence, economic problems, health problems, limitations due to age or disability, loss of possessions or money in situations of emergence of misfortune, death of family members, forced migration or limited freedoms connected with imprisonment.

What might constitute Harm

Physical abuse of a vulnerable person is that which results in actual or potential physical harm from an interaction or lack of an interaction by an individual known or unknown to the person. It could also be caused by the lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power or trust. There may be single or repeated incidents.

Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the vulnerable person can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential and in the context of the society in which the vulnerable person lives. Acts include restriction of movement, patterns of belittling, and denigrating, scapegoating, threatening, scaring, discriminating, ridiculing or other nonphysical forms of hostile or rejecting treatment.

These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power.

Neglect is the failure to provide for the development of the vulnerable person in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes or has a high probability of causing harm to the vulnerable person's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect vulnerable people from harm as much as is feasible. Identifying neglect in resource poor contexts can be especially difficult. Failure to provide adequately for vulnerable people in situations of extreme poverty does not necessarily constitute neglectful behaviour. Rather, it is a case of assessing available resources and the efforts parents and carers are making to meet the needs of their vulnerable people.

Sexual abuse is the involvement of a vulnerable person in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the vulnerable person is not developmentally prepared and cannot give consent, or that violate the law.

Vulnerable person sexual abuse is evidenced by this activity between a vulnerable person and an adult or another vulnerable person who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to:

- The inducement or coercion of a vulnerable person to engage in any unlawful sexual activity;
- The exploitative use of vulnerable person in prostitution or other unlawful sexual practices; and

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- The exploitative participation of vulnerable people in pornographic performances and materials.

Commercial or other exploitation of a vulnerable person refers to use of the vulnerable person in work or other activities for the benefit of others. This includes, but is not limited to, theft, fraud, pressure regarding property, misuse or misappropriation of property or benefits, child labour and child prostitution. These activities are to the detriment of the vulnerable person's physical or mental health, education, or spiritual, moral or social-emotional development.

Discriminatory abuse refers to ageism, racism, and sexism, based on disability or other forms of harassment, slurs or hate-crime.

Expected standards of behaviour of OPM staff and contractors towards vulnerable people

The principle is that staff and contractors should avoid actions or behaviour that may constitute poor practice or potentially offensive, harmful or abusive behaviour, as well as being open and transparent such that actual or potential breaches of this guidance may be challenged.

The guidance applies to conduct in the professional role. In situations where OPM staff and contractors are making project visits and staying in communities that are not your own, you will never be entirely 'off duty' and so standards of behaviour must still apply. The standards are not limited to standards around interaction with vulnerable people, but include the standards as set in OPM's code of conduct.

It should be noted that if child protection concerns arise in relation to staff and others outside their professional roles (i.e. concerns regarding their behaviour towards children that would constitute a breach of the Safeguarding Policy, Principles of Practice and Code of Conduct), OPM will consider follow up action, including possible disciplinary action.

When working with vulnerable people **you must always:**

- Try to minimise time working alone with vulnerable people and plan your work so that at least two adults are present at any time. If working alone is unavoidable, you should move to an area where other adults can see both you and the vulnerable person.
- Avoid inappropriate physical contact with a vulnerable person. If a vulnerable person is hurt or distressed, do your best to comfort or reassure her/him without compromising her/his dignity or doing anything to discredit yourself. Aim to understand local norms around physical contact between vulnerable person and adults and make sure that any appropriate physical contact, such as holding hands, is initiated by the vulnerable person. Cease any physical contact that appears to make the vulnerable person and/or others around the vulnerable person feel uncomfortable.
- Behave appropriately; make sure that language is moderated in their presence and refrain from adult jokes or comments that may cause discomfort or offence.
- Be sensitive to local norms and standards of behaviour towards vulnerable people.
- Listen to what the vulnerable person are saying, and respond appropriately.
- Conduct interactions with vulnerable people that are safe, appropriate, and sensitive to the feelings of the vulnerable person.
- Be aware of situations that may present risks and manage these.
- Be familiar with the procedures for reporting concerns or incidents at OPM and any potential partner organisation with which you are working, including how to report any concerns.

When working /interacting with vulnerable people **you must never:**

- Hit or otherwise physically assault, harm or abuse them.
- Develop physical/sexual relationships with them.
- Behave verbally or physically in a manner that is inappropriate or sexually provocative.
- Have a vulnerable person with whom you are working stay overnight at your home or other personal accommodation in which you are staying.
- Condone, or participate in, behaviour of a vulnerable person that is illegal, unsafe or abusive.
- Act in ways intended to shame, humiliate, belittle or degrade vulnerable people, or otherwise perpetrate any form of emotional abuse
- Allow allegations made by a vulnerable person or concerns expressed by others about their welfare, to go unrecorded or not acted upon.
- Use any computer or other electronic device to view, download, distribute or create indecent or inappropriate images of vulnerable people.
- Do things for vulnerable people of a personal nature that they can do for themselves. This may include feeding them, helping with toileting needs and others as appropriate.
- Discriminate against, show differential treatment or favour particular vulnerable people to the exclusion of others.

OPM also subscribes to the following principles on the prevention of sexual exploitation and abuse of vulnerable people:

- Sexual exploitation and abuse by OPM workers and representatives constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with vulnerable people is prohibited regardless of the age of majority or age of consent locally.
- Sexual relationships between staff and any beneficiaries of OPM implemented programmes and research, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of OPM and are strongly discouraged.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of any assistance that is due to vulnerable people with whom we work.
- Staff and contractors are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

These lists are not exhaustive. All actions or behaviour which may constitute poor practice or be potentially abusive behaviour should be avoided

