

Safeguarding of Vulnerable Persons

Including Child Protection Policy
(Global)

March 2024

About Oxford Policy Management

Our vision is for fair public policy that benefits both people and the planet. Our purpose is to improve lives through sustainable policy change in low- and middle-income countries.

Through our global network of offices, we work in partnership with national stakeholders and decision makers to research, design, implement and evaluate impactful public policy. We work in all areas of economic and social policy and governance, including health, finance, education, climate change and public sector management. We have cross-cutting expertise in our dedicated teams of monitoring and evaluation, political economy analysis, statistics, and research methods specialists. We draw on our local and international sector experts to provide the very best evidence-based support.

Oxford Policy Management Limited
Registered in England: 3122495

Tel: +44 (0) 1865 207 300
Fax: +44 (0) 1865 207 301
Email: admin@opml.co.uk
Website: www.opml.co.uk

Key Definitions

Definition	Term
Board	The Board of Directors of Oxford Policy Management Limited
Child	Person under 18 years of age.
Child Abuse	Any form of Physical Abuse; Emotional Abuse; Sexual Abuse; or Neglect or other exploitation resulting in actual or potential Harm to the Child's health, well-being, survival, development, or dignity.
Emotional Abuse	Injury to the psychological capacity or emotional stability of a Vulnerable Person and includes but is not limited to: humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the Vulnerable Person feel diminished or embarrassed.
Exploitation	The abuse of a Vulnerable Person where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the Vulnerable Person's physical or mental health, development, education, or well-being.
FARCC	Finance, Audit, Risk and Compliance Committee: the sub-committee of the Board of Directors of Oxford Policy Management Limited responsible for matters relating to audit, risk and compliance.
Fraternise	Partiality or preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. May include a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.
Harm	The risk of actual, attempted or threatened exploitation, abuse or harassment regardless of the territory in which it takes place and whether or not such conduct would amount to a criminal offence in the United Kingdom or an offence under the laws of the territory in which it takes place.
Neglect	Failure to provide for a Vulnerable Person's basic needs in line with cultural expectations.
OPM, the Organisation or us, we, our	Oxford Policy Management Limited, Oxford Policy Management Limited's subsidiaries and branch and representative offices, wherever located, and Oxford Policy Management Limited's subsidiary's branch and representative offices wherever located.
Physical Abuse	Acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, Harm or risk of Harm to a Vulnerable Person's health or welfare, or death. Such acts may include, but are not limited to: Punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt.

Safeguarding	Promoting the welfare of Vulnerable Persons and protecting those who are at risk from Harm.
SMT	Senior Management Team: OPM's executive leadership team
Sexual Abuse	The actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions. Child Sexual Abuse is the use of power or authority to involve a child in sexual activity by another person. Sexually abusive behaviours may include: touching genitals or breasts, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials.
Staff	Employees at all levels, directors, officers, agency employees, seconded workers, volunteers and interns.
Suppliers	All individuals and organisations providing goods and/or services to OPM in connection with our business and/or any of our projects.
Vulnerable Person/People	Includes: All people under the age of 18 wherever situated anywhere in the world; and Any person who may reasonably be considered Vulnerable by reason of age or physical or mental disability or other relevant circumstances including their ethnicity or by reason of being an indigenous person.
You and Your	Either Staff, Suppliers or both Staff and Suppliers as applicable.

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1 Introduction

1.1 Document Purpose

OPM's purpose is to improve lives through sustainable policy change in low- and middle-income countries. In pursuing our purpose we must always promote the welfare of the most vulnerable people we come into contact with and safeguard them from Harm.

Given our commitment to have a positive impact the very least that we should do is ensure that we do not cause Harm to those we come into contact with.

Safeguarding incidents put our work, and OPM at risk. It is OPM's policy to prevent any Harm done to those we work with and to have zero tolerance of any behaviour which contravenes this Policy.

Safeguarding is everyone's responsibility and a top priority for us and our donors.

The purpose of this Policy is to:

- Protect Vulnerable People with whom You come into contact during the course of Your work, in any country in the world.
- To provide You with the overarching principles that guide OPM's approach to Safeguarding and which should be applied by You.
- Communicate to all Staff and Suppliers the process to report Safeguarding concerns.

This Policy does not form part of any employee's contract of employment and it may be amended at any time.

1.2 Who does this policy apply to?

This Policy applies to everyone working for OPM or on our behalf in any capacity, including: Staff, Suppliers (including external consultants), third-party representatives, business partners and any other person associated with us, wherever located.

This Policy also applies to all downstream actors working on projects for which OPM holds the contract with a donor, whether or not those actors are directly sub-contracted to OPM. Application of the Policy to downstream actors is the responsibility of the sub-contractor with whom OPM has an agreement.

2 Policy Statement

2.1 Principles

This Policy is founded on four principles:

1. Dignity and Respect for all:

All people regardless of age, disability, religious belief, sexual orientation or identity deserve to be treated with dignity and respect and should be protected from Harm.

2. OPM has an obligation to safeguard Vulnerable People:

We have a particular obligation to promote the welfare and protect the Vulnerable from Harm, therefore we must systematically enact processes and practices to safeguard them in line with international standards, as per the Common Approach to Protection from Sexual Exploitation, Abuse and Harassment:

<https://capseah.Safeguardingsupporthub.org/common-approach>

3. Zero tolerance of inaction:

Harm can be caused or compounded by OPM's response to any report of Harm, therefore all reports must be responded to promptly sensitively and in line with Policy.

4. Victim-survivor centred approach;

All actions to address Harm must prioritise the needs and wishes of the victim/survivor as per UN guidelines: www.un.org/victims-rights-first

The term Harm includes: sexual exploitation, sexual abuse and sexual harassment and therefore:

- i. sexual activity with any person under the age of 18, regardless of the local age of majority or age of consent or any mistaken belief held by You;
- ii. "transactional sex" including but not limited to the exchange of money, employment, goods, or services or other things of value for sex including sexual favours or any form of humiliating, degrading or exploitative behaviour on the part of a member of Staff or Supplier; and
- iii. any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes.

2.2 Laws and Guidance

This Policy, OPM's Code of Conduct, and Safeguarding Programme have been drawn up on the basis of law and guidance that seeks to protect Vulnerable People including:-

- The Common Approach to Protection from Sexual Exploitation, Abuse and Harassment 2023
- The United Nations Convention on the Rights of the Child 1991
- The UK Children Act 1989
- The General Data Protection Regulation 2016 and the Data Protection Act 2018
- The UK Human Rights Act 1998
- The UK Sexual Offences Act 2003
- The UK Safeguarding Vulnerable Groups Act 2006
- The UK Children and Families Act 2014
- The UK Protection of Freedoms Act 2012
- The UK Disability Discrimination Act 2005
- Relevant UK government and other relevant guidance on Safeguarding Vulnerable people

2.3 OPM's commitment

We will seek to keep Vulnerable People safe by:

- i. Keeping their needs and rights at the centre of what we do;
- ii. Valuing them, listening to and respecting them, keeping them appropriately informed, and involving them appropriately in decision making;
- iii. Maintaining governance structures which provide internal challenge and oversight of our policies and procedures at organisational and project level;
- iv. Adopting appropriate practices through procedures and codes of conduct for Staff, Suppliers and others, including e-safety and data protection procedures;
- v. Recruiting Staff and engaging Suppliers safely by ensuring that all necessary due diligence checks are made as per OPM's Due Diligence Policy;
- vi. Effectively managing of Staff (and Suppliers as relevant) through supervision support and or training;
- vii. Making appropriate and accessible reporting and feedback mechanisms available to our Staff, Suppliers and the communities we work with;
- viii. Assessing and where necessary, investigating all reports made under this policy as per OPM's Issues, Concerns, Reporting and Management Policy;
- ix. Adopting a zero-tolerance approach to breaches of this policy and related guidance; and
- x. Sharing concerns as relevant with national government agencies, our clients and Suppliers.

3 Roles and responsibilities

3.1 Responsibilities for this Policy

The Board has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it. Subsidiary boards and Suppliers shall adopt this Policy modified, if appropriate, to incorporate local law where this does not conflict with the laws and guidance listed under 3.2 of this Policy.

The SMT is accountable to the Board for the effective implementation of this Policy and management at all levels is responsible for ensuring those reporting to them, whether Staff or Suppliers, understand and comply with this Policy and have received adequate and regular training on this Policy.

Day-to-day responsibility for operating the Policy and ensuring its maintenance and review has been delegated to the Head of Legal.

3.2 Your Responsibilities: what we expect from You

Safeguarding itself is the responsibility of everyone: You are responsible for acting in accordance with this Policy and for reporting any reasonably suspected breach of this Policy in line Section 5 of this Policy.

You are expected to uphold professional behaviours whilst on OPM business, including:

1. No inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate language or behaviour to anyone;
2. No sexual activity with any child. A child is a person under 18 years old regardless of the local laws or practice. Mistaken belief about a person's age is no defence;
3. No buying sex: this includes any form of sexual activity from adults, whether during office hours or non-business time. It applies even if prostitution is legal locally. It also includes obtaining or accepting sexual favours in return for non-monetary items such as goods or services, connections, or qualifications;
4. Do not procure, store or share indecent images of children or other illegal or legal images that may cause harm to, or be the result of harm to any individual;
5. Do not fraternise with people from local communities or lead others to believe You are partial towards particular individuals you are working with;
6. Do not invite unaccompanied Vulnerable People into private residences, unless they are at immediate risk of injury or in physical danger;
7. Do not hire children for domestic or other labour which is inappropriate given their age or developmental stage. Work done by children must not interfere with their education and recreational activities; or place them at significant risk of injury;
8. Take care when photographing or filming Vulnerable People to ensure that You obtain informed consent, the images represent the context and facts honestly, and show the person in a dignified and respectful manner.

4 Breaches of this Policy

4.1 Obligation to Report

Poor handling of Safeguarding concerns or incidents can cause or compound Harm and therefore reports must be handled consistent with this Policy, promptly, and sensitively.

OPM has a mandatory reporting policy this means that if You believe that someone has not complied with this Policy, or that there is a significant risk that this Policy may be breached You must report it in line with the guidelines below.

- i. **Mandatory and Immediate (within 24 hours):** If You are aware of an alleged incident of Harm this must be reported immediately through one of the reporting mechanisms listed below.
- ii. **Mandatory Reporting (within 5 working days):** If You are aware of any alleged Policy non-compliance, for example failure to adhere to the professional behaviours outlined in Section 3.2. this must be reported as soon as possible through one of the reporting mechanisms listed below.

A reporting template is available at Annex A to assist You in capturing all the relevant details, but You are not required to use it to submit a concern to OPM.

All reports received by OPM will be handled in line with OPM's Issues, Concerns Reporting and Management Policy.

4.2 Reporting Mechanisms

You may submit a written or verbal report to Your Line Manager or Fieldwork Manager.

Should You have concerns about reporting to Your Line Manager or Fieldwork Manager, You may submit a Report to Your Director or Project Manager, or directly to the OPM Head of Legal, Governance Risk and Compliance Officer, or any member of the OPM HR Team.

Should You wish to speak to an independent Third Party You may submit Your report through our Whistleblowing Hotline provided by EthicsPoint using the contact details below:

- Telephone from the UK: 0800 890 011 followed by 833-945-3461 when prompted
- Telephone from outside the UK: see OPM's website for a list of local numbers
- Web reporting form: opml.ethicspoint.com

OPM has an obligation to notify our clients (including for example FCDO, DFAT and USAID) of incidents which breach our Safeguarding Policy. The Head of Legal is responsible for coordinating notifications to clients. However, You can use a client's reporting mechanism directly.

FCDO details: email reportingconcerns@fcdo.gov.uk for or telephone +44 (0) 1355 843747.

5 Consequences for Breaching this Policy

We have a zero-tolerance approach to breaches of our Safeguarding Policy. Any Staff who breach this Policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals or organisations working on our behalf if they breach our Safeguarding standards as set out in this policy.

No action will be taken against those who inform of incidents or risks in good faith. OPM's whistleblower procedure outlines that all reports and information provided will be treated with respect and confidentiality and that OPM will take steps to ensure that the reporter can report without fear or retaliation.

6 Supporting others to comply

6.1 Raising Awareness about this Policy

It is essential that everyone referred to in Section 1.2 of this Policy is aware of this Policy and are supported to comply effectively with its requirements.

OPM commits to publishing this Policy on its website and sharing widely amongst Staff, Suppliers and other Stakeholders. Awareness of the Policy will be raised through suitable channels such as our in-house newsletter, posters in our offices and pre-engagement briefings for Staff and Suppliers working on projects with a Safeguarding element.

For guidance requests and queries regarding this policy email Legal.Contracts@opml.co.uk

6.2 Training

Training on this Policy forms part of the induction process for all Staff and biennial mandatory refresher training will also be provided. OPM will provide specialist training as required by Staff in roles which have particular responsibilities for Safeguarding, such as the SMT, Governance Risk and Compliance Officer or Safeguarding Focal Points.

A copy of this policy will be provided to all Suppliers and we expect all Suppliers to provide training to an equivalent standard to their personnel and other persons working for or on its behalf. The training may be either in-house, through a third party or via OPM's training platform. OPM's Suppliers are responsible for verifying that those in their supply chain are providing appropriate training as required by this Policy.

6.3 Working with our Suppliers

OPM strives to do business with others who commit to acting with integrity and accordingly OPM seeks to work with Suppliers who have committed to our Safeguarding Policy.

All Supplier organisations are required to either have internal policies that meet our standards or comply directly with OPM's own Policy, this requirement is reflected in OPM's Standard Terms and Conditions of Engagement.

When engaging Suppliers OPM will do so safely, by ensuring that all necessary due diligence checks are made in line with our Due Diligence Policy.

OPM provides advice to its Suppliers regarding our Safeguarding standards and requirement for practical adherence to our Policy. Where appropriate we will share written resources to enable our Suppliers to conform effectively with our Policy.

7 Continuous Improvement

OPM commits to continuously improve our approach to Safeguarding others from Harm. This includes:

- i. A commitment to share good practice with other organisations in our sector and supply chain;
- ii. To review and update this Policy every 2 years or sooner should there be changes to relevant legislation; and
- iii. To systematically record in a secure register all reports of breaches of this Policy, and periodically review them to learn lessons and improve our response to reports.

8 Linked Policies

- Anti-slavery and Human Trafficking Policy
- Child Safeguarding Statement
- Code of Conduct (Staff)
- Code of Conduct (Supplier)
- Code of Conduct (Supplier Individuals)
- Data Protection Policy
- Disciplinary Procedure
- Due Diligence Policy
- Equality, Diversity and Inclusion Policy
- Issues, Concerns, Reporting and Management Policy
- Recruitment Policy
- Whistleblowing Policy

Annex A Working with children: required standards of behaviour

All persons and entities working for or on behalf of OPM in any capacity, is required to meet the following professional standards of behaviour in regards to children. Note these behaviours are not intended to interfere with normal family interactions:

1. Treat all children with respect;
2. Do not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
3. Do not use physical punishment on children;
4. Do not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services;
5. Wherever possible, ensure that another adult is present when working near children;
6. Do not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger;
7. Do not sleep close to unsupervised children unless absolutely necessary, in which case a manager's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children);
8. Never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium;
9. Do not hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury;
10. Do comply with all relevant local legislation, and that of my contracting jurisdiction, including labour laws in relation to child labour;
11. Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures;
12. Immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, which occurred before or occurs during association with OPM to legal.contracts@opml.co.uk; and
13. Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse.
14. When photographing or filming a child or using children's images for work-related purposes all persons and entities working for or on behalf of OPM in any capacity must:

- 14.1. Take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child;
- 14.2. Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. An explanation of how the photograph or film will be used must be provided;
- 14.3. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- 14.4. Ensure images are honest representations of the context and the facts; and
- 14.5. Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

Annex B Reporting Template

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

What has prompted your 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. Provide relevant details:

What action do you recommend for OPM?

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: