



POLICY
Safeguarding



Content

The Policy	4
Code of Conduct	9
Raising a Complaint	12
Internal Documentation	14
Annex 1: Glossary of Terms.....	16
Annex 2: Programmatic Approach to Child Protection	19
Annex 3: List of designated staff members for receiving complaints and external services	26
Annex 4: Complaints Mechanism Flow Chart	27
Annex 5: Serious Incident Reporting.....	28
Annex 6: Safeguarding Incident Reporting Form.....	30
Annex 7: Focal Point for Safeguarding in the Board of Light for the World International.....	33
Annex 8: Focal Points for Safeguarding in the National Boards of Light for the World	34



The Policy

Policy Purpose

The purpose of this policy is to protect people, especially children, adults at risk and beneficiaries of assistance, from any harm that may be caused due to them coming into contact with Light for the World. This includes harm arising from:

- The conduct of staff and Light for the World representatives
- The design and implementation of Light for the World's programmes and activities

This policy lays out the commitments made by Light for the World and informs staff and representatives of their responsibilities in relation to safeguarding.

Policy Statement

Light for the World believes that everyone we come into contact with, regardless of age, gender identity, disability, belief, sexual orientation, ethnic origin, or other status has the right to be protected from all forms of harm, abuse, neglect and exploitation. Light for the World applies a zero-tolerance policy.

This policy will address the following areas of safeguarding:

- ▶ child protection,
- ▶ adult safeguarding,
- ▶ protection from sexual exploitation, abuse and bullying.

Light for the World commits to embedding safeguarding in all of its work, through the three pillars of prevention, reporting (by a complaints mechanism) and response.

Light for the World is committed to providing a safe environment for all of its employees, free from discrimination on any grounds and from any kind of harassment at work including sexual harassment and bullying.

Light for the World treats all incidents seriously and immediately investigates all allegations of all forms of harm and harassment, including sexual harassment or bullying. Any person found to have sexually harassed or bullied somebody will face disciplinary action, up to and including dismissal from employment.

All complaints are taken seriously and treated with respect and confidentiality. No one will be victimised for making a complaint.

What Light for the World means by “Safeguarding”

Safeguarding means protecting people’s health, well-being and human rights and enabling them to live free from harm, abuse, neglect, and bullying.

We understand it to mean protecting people, children and adults at risk, from harm arising from direct or indirect contact with our staff, volunteers or programmes. Safeguarding puts all affected persons at the centre of all we do. We understand children and persons with disabilities, and females among these groups in particular, are especially vulnerable and are exposed to higher risks.

The inclusion of safeguarding measures is required, without exception, across all of our programmes and by our partners and staff. All partners in programmes and staff are expected to proactively identify, prevent and guard against all risks of harm, exploitation and abuse. Light for the World provides advanced, accountable and transparent systems for responding, reporting and documenting findings and lessons learned when risks materialise. Light for the World’s systems are survivor-centred and protect survivors/witnesses/victims from the accused perpetrator until the case is resolved.

Scope

This policy applies to Light for the World International and all its core and associate members. Light for the World International is responsible for coordinating all issues around this policy and is tasked with supporting its members in implementing the policy. The management develops an implementation plan with annual updates. When implementing the policy, the principle of proportionality shall be applied.

Associate members may in addition adopt their own policy on Safeguarding providing it meets the standards stated in this policy. In either case, associate members operationalise the policy independently and are therefore accountable for meeting these standards in their implementation.

The Safeguarding Policy is to be applied across all organisational activities and in all of Light for the World’s programme themes. All Light for the World’s staff and representatives and partner organisations are expected to be aware of and adhere to the policy. Light for the World’s representatives are defined as trustees, consultants, volunteers who work directly for Light for the World and persons travelling on Light for the World business, including but not limited to; volunteers, consultants, contractors and programme visitors (including celebrities and journalists).

In addition to complying with the policy, all representatives must sign and will be held accountable to the Light for the World’s Code of Conduct (Part II).

People – Prevention

Light for the World responsibilities

Light for the World puts protection at the centre of its work. The management facilitates its inclusion across different areas of responsibility and ensures the allocation of the necessary human and other resources to enable full implementation of this policy.

Light for the World empowers its staff to act with safeguarding in mind by equipping staff with the necessary information and skills to identify risks and contribute to the overall aim of people, especially children, young people, and adults at risk safe from harm.

Managers and Focal Points

Managers and Focal Points are responsible for escalating any reported incidents to the Global Safeguarding Focal Point for an appropriate response. Additionally, they work to ensure a safe and respectful environment. Focal Points will be responsible for specific tasks, such as training and relevant administrative work.

The Global Safeguarding Focal Point

The appointed Global Safeguarding Focal Point is responsible for coordinating a response to all incidents reported to managers, focal points, and the Safeguarding email (safeguarding@light-for-the-world.org). He/she may form a Case Management Team depending on the needs of the case and may refer the case to an external investigator. The Global Safeguarding Focal Point is also responsible for reporting the case to the necessary authorities, including but not limited to donors and regulatory bodies. In all cases, the victims' wishes for confidential treatment will be taken into account.

If an incident concerns the CEO, the Global Safeguarding Focal Point is responsible for liaising with the Chairperson of the Board of Light for the World International and with the Focal Point to the International Board on Safeguarding.

Should the Global Safeguarding Focal Point be absent, an appointed representative assumes these responsibilities.

The Chief Executive Officer

The CEO reports annually to the Assembly of Members on implementation. During the year, the CEO reports to the International Board in cases of important developments and severe incidents. The CEO informs the National Directors of Associate Members of important developments and severe incidents as they arise in the core organization and provides adequate information within the core organization.

The National Directors of Associate Members

The National Directors of Associate Members are responsible for policy implementation in their respective organizations. National Directors report to the Assembly of Members on implementation annually. The National Directors inform Light for the World International of important developments and severe incidents as they arise, as well as on overall progress in implementation in their respective organization.

The National Boards

The National Boards are responsible for overseeing the fulfilment of these responsibilities in the respective legal entities. Each Board appoints a Safeguarding Focal Point to oversee the legal entity's compliance with the Policy (see Annex 8).

The Board of Light for the World International

The Board of Light for the World International is responsible for overseeing the fulfilment of these responsibilities in the core organisation. The Board appoints a Safeguarding Focal Point to oversee the compliance of the core organisation with the Policy (see Annex 7). Should a case involve the CEO, the Chairperson of the Board may receive the complaint and will liaise with the Safeguarding Focal Point to the International Board and the Global Safeguarding Focal Point to ensure an appropriate response.

Staff responsibilities

- All staff read and sign a commitment to adhere to the Light for the World's Safeguarding Policy and Code of Conduct prior to commencing work.
- All staff have access to, are familiar with, and know their responsibilities within this policy. They are aware of their duty to report all incidents to a manager, focal point, or to the Complaints Mechanism through safeguarding@light-for-the-world.org.
- Key supporting policies are signed by all staff and representatives.
- Compliance with the Safeguarding Policy is included in all employment contracts.
- All staff receive induction training on safeguarding within six months of starting work, or sooner, if their role requires contact with children, young people or adults at risk.

- Capacity building on safeguarding is provided across the organization every two years, with refresher training on the Safeguarding Policy where the need is identified.
- Staff with specific responsibilities for safeguarding receive regular specialist capacity building training and have access to the resources and tools necessary to execute their responsibilities.
- All safeguarding training received by staff is signed by the recipients and these records are kept by Light for the World on file.

Partners' responsibilities

- All partners will go through Light for the World's due diligence process.
- All partners delivering work directly with beneficiaries must complete a safeguarding agreement, which ensures compliance with Light for the World's Safeguarding Policy; the provision of safeguarding training for all staff, identifying and training an identified individual who will act the safeguarding lead and a commitment to ensure all staff understand and comply with Light for the World's Code of Conduct.
- Project partners will receive training and/or other forms of information as appropriate about safeguarding and Light for the World's approach to protection.
- Light for the World supports its partners in programmes in the development of their own safeguarding policies that are adapted to their local context and working environment. These policies would need to be in line with Light for the World Safeguarding Policy.
- In annual reporting, all partners in programmes are required to report on measures taken to enhance Safeguarding systems, including training, policy reviews, among others. Partners in programmes are also required to report safeguarding problems either

within their organisation or with beneficiaries to the organisation.

- Light for the World is committed to support the partner organisation – in the case of a concrete situation of violence against a person – to establish systems to prevent further damage and find systemic solutions. Light for the World may support partner organisations who are involved in helping any person who has been the victim of any form of violence.

Light for the World Representatives

- All representatives must sign Light for the World's Safeguarding Policy.
- Expectations regarding safeguarding are explained in a briefing prior to any visit which involves direct or indirect contact with children, young people or adults at risk.

Human Resources Procedures

- Implement stringent safeguarding procedures when recruiting, managing and deploying staff
- Ensure that staff receive training on safeguarding at a level appropriate for their role in the organisation (starting with the induction training) to empower the staff to identify and respond to risks
- Additional procedures will be adapted once the Human Resource Manual is updated.

Procedures – Reporting and Response Internal System

Light for the World will ensure that there is a safe, appropriate and accessible way of reporting safeguarding concerns available to the staff and the communities we work with.

All staff reporting complaints submitted or received through formal whistleblowing channels (or upon request) will be protected by Light for the World's Complaints Mechanism (Part III). The document on this mechanism provides the details on how to report safeguarding concerns. An incident reporting form is provided for issuing a complaint (see Annex 6).

The main contact for complaints is: safeguarding@light-for-the-world.org (for all other contact details, please refer to the Complaints Mechanism).

Light for the World also accepts complaints from external sources such as members of the public, partners and official bodies.

Associate members operationalise the Safeguarding policy independently. As such, they have their own complaints mechanism and are responsible for managing complaints. They are accountable to meeting the standards in this Safeguarding policy in their implementation. The procedures below are for Light for the World International and its core members.

Response

Light for the World will follow up on safeguarding reports and concerns in accordance with its policy and procedure, and legal and statutory obligations (see Raising a Complaint).

Light for the World will invoke appropriate disciplinary action for staff found in breach of policy. In the case of serious safeguarding concerns Light for the World adheres to mandatory reporting to donors and/or other statutory bodies.

All verified cases are tracked and reviewed/updated regularly in an internal document for all the members of Light for the World, including detailed recommendations and lessons learned. This contributes to cross-organizational learning to prevent similar cases in the future from happening and aims to overcome the reluctance that people may have in exposing misconduct. Information in the internal report will be anonymised.

Accountability

Light for the World will delegate responsibility for safeguarding to staff across the organisation to ensure that safety measures are monitored regularly and that any new risks are identified, addressed as quickly and efficiently as possible.

Organisational Responsibility – Safeguarding is both an organisational and individual responsibility. Light for the World's Boards are ultimately responsible for ensuring the safeguarding policy is effectively implemented so that children, young people or adults at risk benefiting from, or working with Light for the World are not harmed in any way through contact with its staff or operations.

No Place to Hide – Abuse thrives on secrecy and abusers tend to seek out organisations with weak communication and accountability structures. Light for the World encourages an open culture where all concerns are taken seriously, where sensitive issues are discussed without fear and embarrassment and where risks are addressed promptly.

To encourage accountability, Light for the World has the following measures in place:

- Have Focal Points for Safeguarding:
 - ♦ On the level of board members of all respective legal entities
 - ♦ On the level of the management team
 - ♦ On country level - in every country where Light for the World has an office or presence

- Ensure that staff with designated safeguarding responsibilities have the skills and knowledge necessary to fulfil their role and receive regular training and support.
- Ensure that Safeguarding Focal Points are supported by the Global Safeguarding Lead based at the headquarters in Vienna.
- Ensure that the implementation and effectiveness of the safeguarding measures (implementation plan) are reviewed annually and the Safeguarding Policy is updated if needed. The updated policy is approved by the Assembly of Members. The Safeguarding Policy will be reviewed every three years.
- Include Safeguarding as a standard agenda item on all International Board meetings, at least annually.
- Include Safeguarding as a standard agenda item on the International Management Team meetings, at least twice a year.
- Ensure Safeguarding performance is reported to Light for the World's Boards and relevant governance bodies

in-country on an annual basis or whenever issues arise that may affect the reputation and standing of the organisation.

- Ensure gaps in safeguarding are addressed through an appropriately resourced implementation plan.
- Ensure an appropriate evaluation of safeguarding procedures and subsequent reporting to be made public is commissioned every three years.

Light for the World will offer support to survivors of harm caused by staff or representatives.

Confidentiality

Light for the World ensures confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to current and subsequent case management is shared strictly on a need-to-know basis and is kept secure at all times.

LIGHT FOR THE WORLD's Associated Policies

- Policy Partnership in Programmes

Code of Conduct

All Light for the World's staff, representatives and partner organisations should be aware of and adhere to this Code of Conduct during and after working hours. Light for the World's representatives are defined as trustees, employees (permanent or temporary), consultants, volunteers who work directly for Light for the World and donors travelling on Light for the World business including but not limited to: volunteers, consultants, contractors and programmed visitors (including celebrities and journalists).

General Conduct

Persons working with Light for the World must:

1. Respect and promote human rights without discrimination of any kind and irrespective of social status, race, ethnicity, color, religion, gender, sexual orientation, belief, age, marital status, national origin, political affiliation, or disability.
2. Treat all beneficiaries, communities, target groups and any other person fairly and with respect, courtesy, dignity and according to the respective country law, international law, and with respect for local customs and culture.

3. Uphold the highest standards of accountability, efficiency, competence, integrity and transparency in the execution of their job.
4. Create and maintain an environment that prevents abuse, including bullying, harassment and sexual harassment, sexual exploitation, abuse of power and corruption, and promote adherence to the Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.
5. Never abuse their position to withhold humanitarian assistance, nor give preferential treatment; in order to solicit sexual favors, gifts, payments of any kind, or advantage. The employee should be conscious of not taking advantage of his/her position and may not accept bribes, or any gifts outside the recommendations of the Anti-Corruption Policy.
6. Never use aid to further a political or religious standpoint. Assistance should not be dependent on the adherence of the recipients to particular political or religious opinions. The promise, delivery or distribution of assistance will not be tied to the embracing or acceptance of a particular political or religious creed.
7. Endeavour not to act as instruments of government foreign policy: never knowingly - or through negligence - allow to be used to gather information of a political, military or economically sensitive nature for governments or other bodies that may serve purposes other than those which are relevant to the respective programme or project being sponsored, nor act as instruments of foreign policy of donor governments.
8. Ensure that their contacts with the authorities, and especially with security forces (military and police) do not compromise their neutrality.
9. Not engage in the practice of proselytizing as Light for the World wants to serve and collaborate with all people regardless of religion, race, ethnicity or gender.
10. Never exploit the vulnerability of any target group, especially women and children, or allow any person/s to be put in a compromising situation.
11. Never commit any act that could result in physical, sexual or psychological harm or suffering to individuals, especially women and boys and girls.
12. Never engage in abuse or sexual exploitation of any target group (men, women and children). This constitutes acts of gross misconduct and is therefore grounds for termination of employment.
13. Never engage in any sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child cannot be argued in defense.
14. Not engage in sexual relationships with beneficiaries. Such relationships are never based on equal power dynamics. Such relationships undermine the credibility and integrity of development work.
15. Never exchange money, employment, goods, or services for sex, including sexual favors. All forms of humiliating, degrading or exploitative behavior are prohibited.
16. Not accept, solicit or engage in the "buying" of or profiting from sexual services.
17. Ensure that reports of breaches of these standards are immediately reported to a Manager, Focal Point or the Global Safeguarding Focal Point for prompt investigative action.
18. Ensure that all confidential information, including reports of breaches of this Code of Conduct, obtained from beneficiaries or colleagues is channelled correctly and handled with utmost confidentiality.
19. Any breach of the Code of Conduct will result in

disciplinary action in accordance with the respective terms, conditions and guidelines of Light for the World.

20. Any staff member purposely making false accusations against another staff member will be subject to disciplinary action.

Specific Focus on Conduct with Children

1. Try never to be alone with a child. If it is necessary to be alone with a child try to make sure that others can hear/see what you are doing. This applies to home visits, taking children to your own house, and taking a child for medical or other care in a personal vehicle or taxi.
2. Do not be involved in bathing or toilet activities except with pre-schoolers or children incapable of washing themselves - and only then if done openly with another worker within hearing/seeing distance.
3. When teaching children or raising awareness amongst children about our work, make sure that it happens in an open environment, where other adults are present or have access to the room.
4. Do not engage in inappropriate physical contact with children, including overly affectionate touching, suggestive behavior, rough physical play, or inappropriate tickling.
5. Do not spend excessive time with any particular child

or children or show obvious favouritism.

6. Do not use physical punishment to discipline a child. Discuss any potential disciplinary issues with a colleague/manager.
7. Do not engage children in domestic work. The ILO Minimum Age Convention (C138 states that the minimum age for any kind of work is never less than the age of completion of compulsory schooling and in any case not less than 15 years (with the exception of 14 years in specific countries) (art.2). National laws may permit children of 13 to 15 years to be involved in light work, as long as it does not harm their health or development and does not prejudice their attendance at school (art.7). In other words, children can engage in domestic and personal work for staff or anyone else, as long as they still go to school and have time to finish their homework, have sufficient time to rest, for leisure time etc.
8. National and international policies on child rights must be followed.

Communication with children

- Create a warm and safe environment for children, treating them with dignity and respect.
- Do not use harsh, harmful, threatening, or insulting language when talking to a child.
- Make sure that your language, in a setting where children are involved, is appropriate, understandable and inclusive.

Raising a Complaint

Light for the World recognises that harassment or bullying may occur in any relationship and is more likely to occur in unequal relationships (e.g. between a supervisor and his/her employee). Anyone who is subjected to harassment, bullying or witnesses abuse should, if possible, tell the alleged offender that the conduct is unwanted, unwelcome or forbidden. When this is not possible, they can approach one of the designated staff members responsible for receiving complaints (Safeguarding Focal Points, Human Resource Manager). They may also report the incident directly to safeguarding@light-for-the-world.org. If the CEO is involved in the allegations, the Chairperson of the Board for Light for the World International may be approached.

If you observe or receive a report of harm or abuse, listen and confirm facts. Where possible, ask the person at risk what they want to happen and ensure that the complainant understands the procedures. Report the concern to one of the designated staff members (Managers, Safeguarding Focal Points, Human Resources Manager. If it involves the CEO, you may approach the Chairperson of the Board for Light for the World International).

All first contact will be held in total confidentiality. A list of designated staff members at Light for the World are attached in Annex 3:

When a designated person receives a complaint, they will:

- immediately record the dates, times and facts of the incident(s) in a confidential and safely stored space on the server
- find out what outcome the complainant is hoping for
- ensure that the complainant understands the organisation's procedures for dealing with the complaint
- discuss and agree upon next steps: either through an informal or formal complaint, on the understanding that choosing to resolve the matter informally does

not preclude the complainant from pursuing a formal complaint if he/she is not satisfied with the outcome

- keep a confidential record of all discussions and store it at a designated confidential and safe storage-space on the server
- respect the choice of the complainant
- ensure that the complainant knows that they can lodge the complaint outside of the organisation through the relevant country/legal framework and provide the relevant contacts/information (see Annex 3)
- Light for the World is committed to complying with and applying national legal requirements.

Light for the World understands the need to support complainants in making complaints. Throughout the complaints procedure, a complainant is entitled to help from a counsellor. Light for the World will ensure that there is an appropriate offer available (see Annex 3).

Light for the World recognises that because harassment or bullying often occurs in unequal relationships within the workplace, complainants often feel that they cannot come forward. Bullying or harassment can also occur between colleagues who are at the same level and that it might be difficult to voice a complaint.

Informal Complaints Mechanism

If the complainant wishes to deal with the matter informally, the designated person will:

- give an opportunity to the alleged offender to respond to the complaint
- ensure that the alleged offender understands the complaints mechanism

- facilitate a discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated counsellor to resolve the matter
- ensure that a confidential record is kept of what happens at a designated safe server-space
- follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped
- ensure that the above is done within 30 calendar days of the complaint being made.

Formal Complaints Mechanism

If the complainant wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the complainant, the formal complaint mechanism should be used to resolve the matter. The designated person who initially received the complaint will refer the matter to the Global Safeguarding Focal Point to instigate a formal investigation. The notifier of any suspected violence/abuse reports immediately via e-mail safeguarding@light-for-the-world.org.

The Global Safeguarding Focal Point may investigate with the matter jointly with a Case Management Team or refer the case to an external investigator. If there is a Workers' Council in place at the location where the incident occurred, it has to be involved.

The Case Management Team will decide who will carry out the following steps:

- interview the complainant and the alleged offender separately
- interview other relevant third parties separately
- investigate and assess the incident based on both

side statements whether or not the incident(s) of harassment, bullying and child abuse took place

- produce a report detailing the investigations, findings and any recommendations
- if the harassment, bullying and child abuse took place, decide what the appropriate remedy for the complainant is, in consultation with the complainant (i.e. an apology, a change of working arrangements, a promotion if the complainant was demoted as a result of the harassment, bullying or child abuse, psychological support/counselling, training/counselling for the alleged offender, discipline, suspension and/or dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped, and that the complainant is satisfied with the outcome
- if it cannot be determined that the harassment, bullying or child abuse took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within 30 days of the formal complaint process being started.

Associate members operationalise the Safeguarding policy independently. As such, they have their own complaints mechanism and are responsible for managing cases. They are accountable for meeting the standards in this Safeguarding policy in their case management.

Outside Complaints Mechanisms

A person who has been subject to harassment, bullying or child abuse can also make a complaint outside of the organisation. This is a country specific option and details are available per country in Annex 3.

Internal Documentation

All verified cases are tracked and reviewed and updated regularly in an internal document for all the members of Light for the World, including detailed recommendations and lessons learned (see Annex V). This contributes to cross-organizational learning to prevent similar cases in the future from happening and it aims to overcome the reluctance people may have regarding Safeguarding. Information in the internal report will be anonymised.



Version: 2019-11
Approved by: Assembly of Members, 2019-11
Next review: 2021-12
Responsible: Policies and Compliance Officer

Light for the World
Niederhofstrasse 26
1120 Vienna, Austria
Europe

www.light-for-the-world.org
info@light-for-the-world.org

Annex 1: Glossary of Terms

Safeguarding definition

Safeguarding

Safeguarding means protecting people's health, well-being and human rights and enabling them to live free from harm, abuse, neglect and bullying.

We understand it to mean protecting people, children and adults at risk, from harm arising from direct or indirect contact with our staff, volunteers or programmes. Safeguarding puts all affected persons at the centre of all we do. We understand children and persons with disabilities, and females among these groups in particular, are especially vulnerable and are exposed to higher risks.

Affected persons

Beneficiary of Assistance

Someone who directly receives goods or services from Light for the World's programmes. Note that misuse of power can also apply to the wider community that Light for the World serves and can include exploitation by giving the perception of being in a position of power.

Child

The term refers to any person below the age of 18.

Adults at risk

Sometimes also referred to as a vulnerable adult or at-risk adult. A person who may need of care due to disability, age or illness; and may be unable to take care of or protect him or herself against significant harm or exploitation.

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.

Safeguarding terms

Harm

Infringement upon an individual's rights resulting in psychological, physical and any other type of bodily or emotional damage.

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.

Sexual Harassment, Exploitation and Abuse

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

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.

Sexual harassment is unwelcome conduct/behaviour of a sexual nature which offends,

humiliates and/or intimidates a person. It includes situations where a person is asked to engage in sexual activity as a condition for that person's employment or receipt of support for funding, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions. Sexual harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitutes sexual harassment include, but are not limited to:

- Physical conduct
 - ♦ Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching.
 - ♦ Physical violence, including sexual assault, physical contact, e.g. touching, pinching. The use of job-related threats or rewards to solicit sexual favours.
- Verbal conduct
 - ♦ Comments on a person's appearance, body, age, private life, etc.
 - ♦ Sexual comments, stories and jokes
 - ♦ Sexual advances
 - ♦ Repeated and unwanted social invitations for dates or physical intimacy
 - ♦ Insults based on the sex of the person
 - ♦ Condescending or paternalistic remarks
 - ♦ Sending sexually explicit messages (by phone, by email or other means)
- Non-verbal conduct
 - ♦ Display of sexually explicit or suggestive material
 - ♦ Sexually-suggestive gestures
 - ♦ Whistling

Harassment

Behaviour that is offensive and intrusive, with a sexual, racial or physical element.

Bullying

Bullying is unwelcome or unreasonable behaviour that demeans, intimidates or humiliates people, either individually or as members of a group. Bullying behaviour, though it can occur in isolated incidences, typically follows a pattern of persistent or intimidating actions.

- ♦ Unwarranted humiliating or offensive behaviour towards an individual or groups of employees.
- ♦ A persistent negative or malicious attack on a personal or professional performance, typically characterised as unpredictable, unfair, irrational and often unseen.
- ♦ An abuse of power or position that can cause such anxiety that people gradually lose all belief in themselves, suffering physical ill health and mental distress as a direct result.
- ♦ The use of position or power to coerce others by fear, persecution or to oppress them by force or threat. It has been identified as a more crippling and devastating problem for both employees and employers than all the other work-related stresses combined.

Safeguarding terms when working with children

Child abuse

Through an action or failing to act, which causes injury, death, emotional harm or risk of serious harm to a child.

Neglect

Failure to meet a child's basic needs (such as love, safety, food, and warmth) in a way that affects their health, development or safety. Harm is not always intended, but it is a result of inaction e.g. leaving a young child home alone. Sometimes the child is intentionally deprived of basic needs.

Physical violence against children

The intentional use of physical violence against a child (including striking the child with or without objects, denying food, forced labour, and homicide), that either results in or has a high likelihood of resulting in harm to the child's health, survival, development or dignity.

Psychological violence against children

Humiliating or degrading treatment causing some degree of pain or discomfort with the intention to discipline, correct, control, change behaviour, or are in the belief that they are educating or bringing up the child. Psychological punishment takes various forms such as humiliation, threats, neglect, degradation, demeaning and ridicule.

Sexual violence against children

Constituting sexual abuse like rape and commercial sexual exploitation including child prostitution, pornography and trafficking. Including harmful traditional practices such as abduction, early marriage, female genital mutilation. It covers all forms of sexual threat, assault, interference and exploitation.

Child Labour

Children prematurely leading adult lives, working long hours for low wages under conditions damaging to their health, their physical and mental development, sometimes separating them from their families, frequently depriving them of meaningful education and opportunities for play, which could open up possibilities for a better future. (Note: this does not include teenagers working a few hours to earn pocket money, children helping on the family farm, nor to youngsters doing household chores (African Child Policy Forum 2006).

Annex 2: Programmatic Approach to Child Protection

Introduction

One of the key principles of Light for the World's engagement is: "No violence against children is justifiable and all violence against children is preventable". The Safeguarding Policy lays out Light for the World's commitments and approach to protect people, particularly children, adults at risk and beneficiaries of assistance from any harm that may be caused due to them encountering with Light for the World.

The Programmatic Approach to Child Protection complements the focus on the behaviour of staff and partners in programmes towards people. It contains the following elements; key information on violence against children with a specific focus on children with disabilities and it presents Light for the World's approach to prevent violence by its staff and while working with partner organisations.

This programmatic approach resides within the Programme Department of Light for the world, under the responsibility of the 'Director of Disability Inclusion in Community Development'.

Global situation, and understanding violence against children

Children all over the world are at risk of encountering violence in their lives. The World Report on Violence against Children (Pinheiro 2006) describes how the dependency of children on adults increases the likelihood of exposure to violence. Violence takes on many forms and has multiple causes. Violence can happen to children with disabilities in their homes, in schools and on the street. Situations of conflict increase the risk exponentially (Groce and Peaglow 2005). This fact is exacerbated by the fact that most descriptions of violence against children, fail to address children with disabilities.

In this document, violence is understood through the following definition; "All forms of physical or mental

violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse". (UN Convention on the Rights of the Child Article 19.1). Further definitions on the types of violence are to be found in Annex 1.

Vulnerability of children with disabilities to violence

The UNICEF report on violence against children estimates that violence against children with disabilities occurs 1.7 times more often than to their non-disabled peers (Groce and Peaglow 2005). The general comments on the convention on the Rights of the Child even quotes that violence against children with disabilities is likely to happen five times more frequently than to their non-disabled peers (See http://www2.ohchr.org/english/bodies/crc/docs/GC9_en.doc). Several studies show that the higher prevalence of violence against children with disability is not caused by the disability itself but by social, cultural and economic issues (Groce and Peaglow 2005, Stöpler 2008, Boersma 2008).

Children with disabilities are often marginalised within families and communities. This results in the fact that they are less connected to people, and to government and non-government services which could protect them from violence. When children with disabilities are regarded as less important in family life, communities in school, by the law, by health care professionals and in general policy making, then it becomes easier for perpetrators to violate their rights and more difficult for the victims of violence to protect themselves. As a result, it is harder for them to get justice after their rights have been violated. By making children with disabilities part of policies and implementation of those policies in society, violence against children with disabilities could be significantly reduced.

Child protection at homes of children with disabilities

Children with disabilities are often isolated from their own family and therefore from various aspects of family

life. To avoid shame, children with disabilities are kept out of sight when neighbours come and they are not made part of family life when special events take place. Subsequently they are often less known within their neighborhoods. Even when they are known, they are often regarded as less important by the family because they do not believe in their ability to contribute economically, either to the family or to the community. All these factors lead to an increased risk of the child with disabilities to violence. Parents of children with disabilities are sometimes ashamed of having a child with a disability, incorrectly assuming that the disability of their child is a punishment because of a sin one of the family members has committed. This shame and disappointment can result in parents hiding their child, neglecting them and committing violence towards them psychologically or physically.

Having a child with a disability will often have financial consequences for families. For example, costs for health care might put a financial strain on families. With some disabilities, children will need more care from family members (or families might lack knowledge on training their child in becoming independent in daily life activities), which can reduce the time that the family can spend on earning an income. These financial consequences for families can lead to frustration that can sometimes be expressed through violence against the child.

For many families in poor and middle countries children are their financial security for the future. Their investment in their children in food, healthcare and education is partly in the hope that the child will provide for them when they grow old. If a family does not recognise the potential of a child with a disability and fears that this child will be a financial burden for the rest of their lives, they are sometimes less inclined to invest in that child. This can lead to further disablement of the child (when there is a lack of investment in food, health care and/- or rehabilitation), and a lower chance of the child enrolling in education.

Not understanding the disability and the support needs of the child, or not understanding that the child has a

disability can also lead to maltreatment. Children with hearing impairments are often reported to be beaten by their families for being disobedient and not listening to their parents. Children with intellectual disabilities or children with sensory impairments like autism or attention deficiency problems are not always recognised as such by their families and thus are regarded as badly behaved and in need of heavy discipline in order to become better behaved.

Sexual violence against children within the family has always been a big problem in being reported and recognised. When a child with a disability is regarded as less important by the family or has difficulty communicating with the family because he/she does not speak, sexual abuse has a higher chance of remaining unnoticed for a longer time. The taboo and shame surrounding sexual violence means that when family members do know about the abuse, they sometimes do not report it, fearing that the blame will be put on the family or on the child.

Protection of children with disabilities in their communities

The link between the family and their immediate community is of high importance. Most families depend on their immediate community in their daily lives for financial and social reasons.

Many parents of children with disabilities fear the judgement of the community and need the community to maintain their status in society. They feel that it is better for their children to suffer than to challenge the injustice in the community. Some parents lack the courage and the confidence to do something about the situation of their children.

Lack of money to help their children and protect their children is an issue for many families in developing countries. To ensure adequate protection of children with a disability, more financial resources may be needed and so the lack of these resources may increase the risk

of violence. Lack of funds for transport to get to school means that children sometimes must walk long distances with the risk of facing violence on the road. Some children never reach school because of lack of money for transportation. There are children who can't walk to school or are unable to memorise the route between home and school. Families can assign a family member to accompany the child but in very poor families where all members take part in income generation, it will be hard to spare time to accompany the child.

Being on the street increases the chances of violence towards the child but also makes it hard for a family to raise their child with levels of "good behaviour" (since they are influenced by many people on the street). Some of the parents try to shield their children from violence on the street and lock them in the house during the day, leaving them to their own devices. By trying to protect their children from violence, parents sometimes violate the rights of their own children. Growing up in poverty is not specific to children with disabilities. The difference is that the child may have requirements for support due to their impairment, for example certain adjustments, which may also entail costs to protect the child from harm. Since children with disabilities are a minority, they tend to lack the peer support on the street and are more likely to find themselves in vulnerable circumstances and subsequently encounter violence.

Poverty, however, does not directly lead to violence. In situations where families are poor, the willingness of the immediate community to contribute to child protection is crucial. When a child is accepted as part of the community, the community often helps to protect the child from harm. Working on the relationships that the families of children with disabilities have with their immediate communities requires little resources and provides effective protection of children with disabilities from violence.

Sexual violence towards children with disabilities also happens within the community. Perpetrators of sexual violence towards children with disabilities will be more likely to stay unnoticed or go without punishment.

Children with disabilities are often regarded as nonsexual. The view of society that persons (including children) are non-sexual, means that children are not included in sexual education and warnings such as "not to go with strangers who can hurt them". The consequences of minimum to no sex education also mean that children with disabilities find it difficult knowing the boundaries of acceptable behaviour and their understanding of consent. Dependencies and increased power disparities exacerbate this problem.

The lack of knowledge and sometimes the lack of communication skills for children with disabilities make it harder for them to recognise that the sexual violence happening to them is unacceptable. At the same time when children do report to their families, the shame, the lack of response from services such as the police, judges and healthcare systems means that many families don't fight for justice when their children have encountered violence.

Protection of children with disabilities in schools

Depending on the policies and the resources of the country, children with disabilities will go to special schools or mainstream schools, or they will not attend school at all. Since specialised schools for children with disabilities are not always nearby, some of these schools provide boarding for the children. History has taught us that boarding schools are frequently places where violence against children is more likely to happen. Any boarding school (whether for children with disabilities or non-disabled children) needs to develop policies aimed at supporting children and encouraging them to report any problems that they might face. Creating an environment through child protection systems where violence is not tolerated and openly discussed, can significantly help to break the cycle of violence that might be "created" by staff and older students.

When special schools have no boarding facilities, they are usually far away from the home environment of the children. In Ethiopia, children migrate away from their parents (sometimes with the consent of the parents

and sometimes without it). These children rent a house together with their peers and live in only with other children (Boersma 2008). Living mostly in households with other children, they lack the protection from their families and their rights are frequently violated by the community. Being away from their families often means that the family will not or cannot negotiate on behalf of their child. Schools and Community Based Rehabilitation (CBR) programmes should become active in protecting these children from violence and in helping them and the society in which they live to develop higher levels of protection for those children with disabilities living amongst them.

In regular schools where children with disabilities are included, teachers are often not prepared to include children with disabilities in their classes. Many teachers must teach large classes and have limited resources to help children who have so-called “special needs”. In quite a few cases teachers pass on their frustrations to the most vulnerable: children with disabilities. The children are told that they are difficult or useless in front of their peers. Other children are told to repeat a class not because of their academic (under) achievements but because their class in the following year would not be accessible for their wheelchairs. There is a need for LIGHT FOR THE WORLD through its partners to work with schools to support teachers both with materials and knowledge. The school community needs improved awareness around disabilities and impairments in general and specifically around the rights of children with disabilities to be protected from violence, equal to their non-disabled peers.

The need to protect children from child labour

Children with disabilities might also be exploited through child labour, especially in situations of (extreme) poverty. Children in general are often and easily exploited as most of them are unaware of their rights and find it hard to speak up for themselves to adults or (stronger) peers. This is even more the case when the child in question has a disability and is physically or mentally not able to voice his or her concerns. Children provide cheap labour and are less likely to claim their payments or other rights. They

often work long hours for little pay in conditions that are lacking minimum safety regulations.

In many countries, persons with disabilities (both adults and children) are found begging on the street. The belief in some societies that persons with disabilities are only able to earn money through begging and that by giving money to the most vulnerable the donor will receive some kind of salvation means that it is more lucrative for families of children with disabilities to send their child out to beg. Street children with disabilities can encounter violence in this way by hustlers and gang leaders, who have many children under their care and who exploit the children by sending them out to beg or to work. In some cases, children are being intentionally disabled for begging purposes.

In some countries children with certain disabilities are believed to be stronger and more suitable for hard labour. Both children with intellectual and hearing disabilities are reported to be exploited by having to do hard labour. Girls especially with intellectual disabilities are also reported more often to be exploited as sex workers or as victims of trafficking. Disability is not only a cause of child labour, but also quite often a consequence of that labour due to the harsh and unsafe/unhealthy conditions and types of hazardous work that children are engaged in.

Many NGOs working on the issue of child labour often focus on ‘orphans and other vulnerable children’ (OVC), as children with HIV/AIDS, girls, street children and children heading households. Quite often neither their focus nor their programmes are addressing or helping children with disabilities. In general, there is a lack of knowledge about the link between child labour and children with disabilities.

Protection of children with disabilities in the justice system, through law and policies

There are different conventions, laws and treaties that protect the rights of all children and of children with disabilities specifically. In addition to article 23 of the UN Convention on the Rights of the Child (CRC), the UN Convention on the Rights of Persons with Disabilities has a

stand-alone provision on children with disabilities (Article 7); additionally, the incorporation of the views of children with disabilities is a general principle (Article 3).

It is important to mention children with disabilities specifically beyond just the documentation and policies. Although the Convention on the Rights of the Child is for all children, in implementing the convention, children with disabilities are often forgotten. As an example, very often courts are not accessible for children with disabilities to attend in person. When children manage to get their case to court, they still might not have access to justice because, for example, they are speaking a language that is not acknowledged by the court (sign language), or because they are considered lacking in intellect. In many cases police officers and other people working in the justice system are equally, as with other parts of society, lacking the belief that there is a need to protect children with disabilities from violence. When perpetrators are considered more important to society, persecuting them for violating the right of a child with a disability is then often regarded as a harm to society instead of a benefit.

This is also reflected in the ways that any violation of the rights of children with disabilities are settled within community structures. Families that are ashamed of having a child with disabilities and do not see how this child will support the family in future, show little persistence in finding justice for their children. When families try to fight for justice on behalf of their child they often face more resistance from society (Boersma 2008).

Government policies that favour the inclusion of children with disabilities in all spheres of life can help in protecting children with disabilities from violence. The absence of these policies essentially equates to the government not caring about the lives of children with disabilities. When policies are available these can be used to lobby for the protection of children with disabilities and to find justice when the rights of children with disabilities are violated. In cases where policies on the protection and inclusion of children with disabilities are lacking, there is a need to build awareness in the government about the importance of policies including children with disabilities as well.

Organisations which could work on protecting children with disabilities

There are several organisations at national and international levels working on behalf of persons with disabilities. These organisations often focus on prevention of disabilities and rehabilitation. In recent years through the UN Convention on the Rights of Persons with Disabilities, focus on the rights of persons with disabilities has increased.

Disability inclusion in community development (DICD) takes place in the community and the field workers based there are often the first outsiders to find out about violence against children with disabilities in those communities. DICD projects have proven to be an effective channel to address neglect of children with disabilities and to help families and children to access their rights to health, education and other services. Some DICD implementing organisations do not have a child protection policy. In addition, they may struggle to find solutions for physical and sexual violence against children with disabilities. Currently there are cases of children dying because families refuse to collaborate with the care offered through the DICD projects. When DICD projects are supported in designing their own appropriate child protection policies and actively promote child protection in the communities where they work, violence against children with disabilities can be significantly reduced.

Disabled Peoples Organisations (DPOs) are very often the first place where young people with a disability meet more persons with disabilities. They find encouragement from the group and they learn about the life stories of others who also have struggled to get recognised in many aspects of their life. Learning from other persons with disabilities is very empowering and encouraging for children with disabilities. Therefore, including DPOs in working on the protection of children with disabilities could be an empowerment tool both for the children and the organisations themselves. The DPOs would ideally be the key partners in fighting violence against children with disabilities. Developing countries particularly lack the capacity to take the lead in fighting violence against

children with disabilities. As powerful stakeholders in the struggle for equality and inclusion however, they should be given the necessary support to become advocates for this issue. DPOs should increase their awareness on the issue of violence against children with disabilities amongst their own members and this will in turn help with the psychological and social support for children with disabilities.

Other partners of Light for the World can be actively working on both promoting child protection of children with disabilities and ensuring that in their own work children are protected from violence. This can be reached through better understanding of the problem and helping partners to put child protecting policies in place.

In most cases, mainstream organisations are the best qualified and the most appropriate to act on child endangerment cases. To support their work, mainstream organisations who work on child rights should be informed about the need to protect children with disabilities and should increase their awareness on reasons why children with disabilities are more vulnerable to violence than their non-disabled peers. Light for the World has a significant role to play in raising awareness of this topic in mainstream NGOs and UN organisations, both those concerned with disability and organisations working on child protection who do not currently include children with disabilities in their work.

In professional child and youth oriented social work there is a clear distinction between suspicion of child endangerment and evidence of child abuse with a graduation in between. That is why all cases must be handled with the appropriate care. It is therefore advisable to proof-read the case, to collaborate with child protection expert organisations and to think about different methods of intervention. Even if from an external perspective a situation looks unbearable, a family-oriented group intervention might be a better solution than separating a child from the family. In the end most children love their parents and may want to remain in their care. Or in school, children might prefer to stay in class, so that a group-oriented intervention might be a good solution.

Light for the World internal measures

Light for the World is committed to protecting children from violence and to help children with disabilities whose rights have been violated to receive justice. The following intervention areas are designed to implement this commitment.

Light for the World ensures that all its employees and representatives understand the need to protect children from violence, and that children with disabilities are more vulnerable to violence and which (in)action can potentially increase the risk of violence for children to face/be exposed to violence. Respective training will be provided on a regular basis.

As Light for the World reports about projects and their beneficiaries, it is necessary that these pictures and stories do not cause any harm. Guidelines on the use of photographs and films of all beneficiaries in projects supported by Light for the World are part of the Policy Ethical Behaviour, and are distributed among staff and representatives.

When there is an incident this will be reported to safeguarding@light-for-the-world.org and followed up as described in this Safeguarding Policy.

Associate members operationalise the Safeguarding policy independently. As such, they have their own complaints mechanism and are responsible for managing cases. They are accountable for meeting the standards in this Safeguarding policy in their case management.

Working with partner organisations

Light for the World works through partner organisations for and with children with disabilities. To ensure the well-being of all children in the projects, support is provided to partner organisations. All untoward incidents must be reported to safeguarding@light-for-the-world.org and followed up as described in this Safeguarding Policy.

Child protection in communities

Light for the World partners work on disability issues in the community. Addressing the issue of violence against children with disabilities within the community is more complex because projects often work with many different organisations and structures which help in the development and rehabilitation of the child. Simply having policies in partner organisations is not enough. Therefore, our partner organisations will be stimulated and supported to train community programs and support them in developing policies and activities which could help the protection of children with disabilities in the communities where they live.

The approach will follow a community protection approach, working to empower children to protect themselves without giving them the sole responsibility for their own protection.

Since Light for the World works with multiple project partners in a given country, it should support local partners to link up to the relevant bodies that could help to facilitate child protection on a community level. This could be done for example through a CBR network (Ethiopia) or the Disability Law Unit (North East India). In this way efforts on a local community level will be supported by regional and national levels.

Working on advocacy for the inclusion of children with disabilities into child protection

Light for the World is known for its work in lobbying, advocacy and mainstreaming on national levels, at EU level and within the UN. Through our work at all these different levels our organisation will take a proactive role in raising the issue of violence against children with disabilities. Currently most child protection policies do not mention children with disabilities and if they are mentioned there are often no guidelines explaining why children with disabilities are more vulnerable to violence and what considerations may be needed to protect children with disabilities from violence. Therefore, Light for the World is committed to contribute at all the levels of its advocacy work to child protection that is inclusive of children with disabilities.

Bibliography

- ACPF (2006). Violence against children in Ethiopia, In Their Words. Addis Abeba, African Child Policy Forum.
- Boersma J.M.F. (2008). Violence against Ethiopian Children with Disabilities, the Stories of Children. Amsterdam, Master Thesis University of Amsterdam.
- Groce, N. E. and C. Peaglow (2005). Violence Against Disabled Children. UN secretary report on violence against children. New York, UNICEF.
- Pinheiro, P. S. (2006). World report on Violence against Children. Geneva, United Nations Publishing Service.
- Stöpler, L. (2008). Hidden Shame, Violence against Children with Disabilities in East Africa. Den Haag, Terre des Homes.

Annex 3: List of designated staff members for receiving complaints and external services

The Global Safeguarding Focal Point is working to update this list regularly.

Designated staff members for receiving complaints

For staff based in Austria

Human Resource Manager

Head of Human Resources

via safeguarding@light-for-the-world.org

This e-Mail box will be accessible only to the Head of Human Resources and International Director Finance, Organisation and Infrastructure

Supervisor/Line Manager

You can approach your or another Supervisor/Line Manager

Workers council

workerscouncil@light-for-the-world.org

This Mailbox will be accessible by the chairperson of the workers council. If the complaint concerns the CEO, the Chairperson of the Light for the World International Board can receive the complaint.

For staff based in Belgium

Complaint Manager

integrity@lightfortheworld.be

This e-mail box will be accessible only to the complaint manager and the Advisor for Integrity.

Supervisor/Line Manager

You can approach your Line Manager or an officer of equal rank.

For staff based in Europe

Equinet Europe

www.equineteurope.org

National external counselling services

For staff based in Austria

Consentiv

Landstrasser Hauptstraße 95/1/4, 1030 Wien

office@consentiv.com

Tel: +43 1 585 38 81

www.consentiv.com

External complaint contacts

For staff based in Austria:

Gleichbehandlungsanwaltschaft

https://www.gleichbehandlungsanwaltschaft.gv.at/documents/340065/441451/130920_GAW_Folder_Diskriminierung_EN_Web.pdf/9b9bb71e-b28a-4bb6-88e6-153bfcd5435b

Consentiv

Landstrasser Hauptstraße 95/1/4, 1030 Wien

office@consentiv.com

Tel: +43 1 585 38 81

www.consentiv.com

For staff based in Belgium

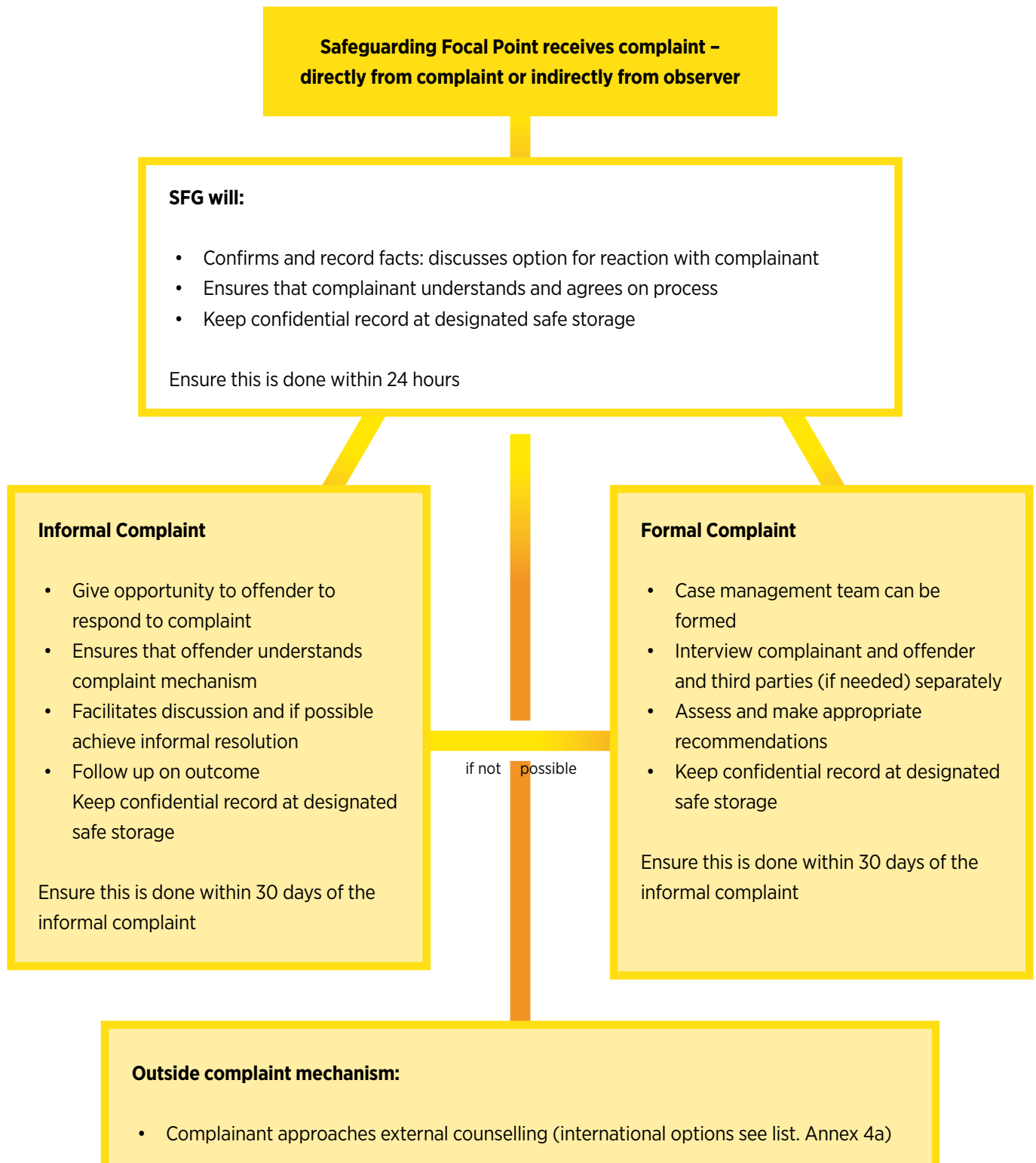
Externe Dienst Voor Preventie en Bescherming op het Werk

IDewe, Wetstraat 23, 1040 Brussel

Tel. 02/237.33.24

Aansluitingsnummer: 828241-0

Annex 4: Complaints Mechanism Flow Chart



Simplified for details see Annex 4.

Annex 5: Serious Incident Reporting

Serious incidents to report	Incidents not to report
A beneficiary or other individual connected with the charity's activities has/alleges to have suffered serious harm.	Minor unusual/aggressive behaviour by a beneficiary towards a member of staff.
Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the charity's care.	Police called to charity premises because a beneficiary is drunk and disorderly.
The Chief Executive of the charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff.	Charity becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the charity; the charity has reported the allegations to the appropriate agencies, and there is no harm to the charity's reputation.
Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer.	Beneficiary in a care home received the wrong medication as a 'one-off' error and there was no significant harm.
A staff computer is found to contain images of child pornography.	Logged accident book reports where there was no significant harm to individuals.
An internal investigation has established that there is a widespread culture of bullying within the charity.	Details of reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where there has been no significant harm to individuals.
A beneficiary or individual connected with the charity's activities has died or been seriously harmed; a significant contributory factor is the charity's failure to implement a relevant policy.	Minor accidental injury to a charity service user e.g. slipping on a wet floor.

Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position.	A staff member who is not in a senior position or position of specific responsibility (e.g. head of safeguarding) has bullied or harassed a fellow staff member. There is no indication of a widespread culture of bullying or harassment within the charity and the incident is dealt with by minor disciplinary action (for example, the staff member responsible has not been
Repeated medication errors to beneficiaries in a care home indicating a systemic problem.	A staff member who is not in a senior position or position of specific responsibility is dismissed for marrying a member of the community in which the charity is working, in breach of the charity's code of conduct but not in breach of local laws.
Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register.	

Annex 6: Safeguarding Incident Reporting Form

Please fill out this form and send it to the Light for the World Global Safeguarding Focal Point through safeguarding@light-for-the-world.org. Please use the subject heading: **"URGENT: Attention, please treat this email confidentially"**

The information provided in this form will be treated confidentially.

Please provide as much information as possible. Areas where you have nothing to report should be left blank.

1. Please indicate the nature of your concern (tick any that apply):

Concerns that specific children or adults may have been harmed or are at risk of harm if no action is taken	Tick if relevant
You have evidence that an adult or child has been, or may be at risk of, being harmed, abused, or exploited. (e.g. eyewitness accounts, visible injuries, victim has confided in someone)	
You are concerned about someone's behaviour towards an adult or child. (e.g. displays of aggression, obsession, or unhealthy interest have been observed)	
You are concerned for the safety or welfare of an adult or child. (e.g. signs or indicators of harm/abuse have been observed)	
How did this concern come to your attention? Please give details, including whether you observed it in person, if someone else reported it to you, or if the victim told you directly:	
Concerns about general behaviour, practices or protocols that could be putting people at risk	Tick if relevant
Concern about someone's behaviour. (e.g. a breach of the Code of Conduct)	
Concern about the protocols or practices of an organisation which could be putting people at risk. (e.g. use of corporal punishment)	
How did this concern come to your attention? Please give details, including whether you observed it in person or if someone else reported it to you.	

2. Information about you

Name:	
Position:	
Organisation:	
Address:	
Phone no:	
Email:	

3. Information about your concern

Nature of concern/suspicion/incident: Describe your concerns or what you have witnessed or what has been reported to you. Give as many details as possible; take as much space as needed.
Country where the incident or concern has arisen:
If the incident/concern is linked to a Light for the World project, please give project no./name:
Date (or time period) of the incident or concern:
Is there a concern that specific individuals still are, or could be, at risk of harm? If yes, please provide details below.

4. Observations and actions

<p>Conversation report</p> <p>If the concern was reported to you by someone else, or if you have spoken to any individuals who are directly affected, please describe here what he or she told you, and what you said.</p>
<p>Observations</p> <p>(Such as injuries, emotional state of the child or adult affected)</p>
<p>Specific factors</p> <p>Please mention any specific factors that need to be taken into consideration e.g. gender, disability, culture.</p>
<p>Action taken</p> <p>Have any measures been taken to protect any affected individuals? If so, please describe.</p>
<p>Any additional measures not yet undertaken</p> <p>Do you feel that any other measures – in addition to those already undertaken – are necessary? If so, please give details.</p>
<p>What communication, if any, have you had with the suspected individual/organisation (if relevant) regarding this concern?</p>
<p>What communication, if any, have you had with the complainant (if relevant) and/or any authorities regarding this incident?</p>

Annex 7: Focal Point for Safeguarding in the Board of Light for the World International

The Board of Light for the World International appoints a Focal Point for Safeguarding among its members.

Terms of Reference for the Focal Point on Safeguarding

The primary role of the Focal Point is to oversee the compliance of Light for the World International with Light for the World's Safeguarding Policy. The CEO, together with the National Directors, is responsible for all operational planning and implementation of the Policy in the core organization. The Focal Point liaises with the CEO.

The Focal Point on Safeguarding will:

- Acquire a profound understanding about Safeguarding and ensure that all Board Members have an adequate understanding of Safeguarding.
- Reviews the annual internal safeguarding report, submitted as part of the Board Report, and shares their findings with the Board of Light for the World International.
- Ensure that Safeguarding is on the Board Agenda at least annually
- In cases of severe incidents:
 - ♦ Communicate directly with the CEO and the Global Safeguarding Focal Point. Ensure that an appropriate response is being developed and implemented at operational level, and communication lines are determined.
- In case a reported incident involves the CEO: the Focal Point on Safeguarding works with the Chairperson of the Board and the Global Safeguarding Focal Point to ensure that an appropriate response is implemented and communication lines are determined.

Annex 8: Focal Points for Safeguarding in the National Boards of Light for the World

Each National Board appoints a Focal Point for Safeguarding among its members.

Terms of Reference for the Focal Point on Safeguarding

The primary role of the Board Focal Point is to oversee the compliance of the respective legal entity with Light for the World's Safeguarding Policy. The management is responsible for all operational planning and implementation of the Policy in the respective legal entity. The Focal Point liaises with the National Director.

The Focal Point on Safeguarding will:

- Acquire a profound understanding about Safeguarding and ensure that all Board Members have an adequate understanding of Safeguarding.
- Review the annual internal safeguarding report, submitted as part of the Board Report.
- Ensure that Safeguarding is on the Board Agenda at least annually
- In case of severe incidents within the legal entity:
 - ♦ Communicate directly with the National Director and the Global Safeguarding Focal Point. Ensure that an appropriate response is being developed and implemented at operational level, and communication lines are determined.
- In case a reported incident involves the National Director: the Focal Point on Safeguarding works with the Chairperson of the Board, the CEO, and the Global Safeguarding Focal Point to ensure that an appropriate response is implemented and communication lines are determined.





Policy

Safeguarding

I. The Policy

II. Code of Conduct

III. Complaints Mechanism

Annex 1: Glossary of Terms

Annex 2: Programmatic Approach to Child Protection

Annex 3: List of Designated Staff Members and External Services

Annex 4: Complaints Mechanism Flow Chart

Annex 5: Serious Incident Reporting

Annex 6: Safeguarding Incident Reporting Form

Annex 7: Focal Point for Safeguarding in the Board of Light for the World International

Annex 8: Focal Points for Safeguarding in the National Boards of Light for the World

Status: approved by Assembly of Members, 2019-11

Version: 2019-11

I, the undersigned, agree to adhere to Light for the World Safeguarding Policy including all Annexes:

Organisation:

Position:

Name:

Date

Signature
