

VS08- INASP Safeguarding & Digital Safeguarding Policy

Scope

Safeguarding in its broad sense means protecting people and the environment from harm, but this policy focuses on preventing and responding to harm caused by sexual exploitation, abuse, harassment or bullying. Within this broad scope, the specific aim of the policy is to prevent and respond to all forms of harm to children (up to age 18), young people (aged 15-24) and vulnerable adults, including physical abuse, sexual abuse, online abuse, child sexual exploitation, neglect and negligent treatment, emotional abuse and commercial exploitation.

This policy also sets out INASP's approach to digital safeguarding and covers all digital spaces where INASP's work is conducted. This includes, but is not limited to: email, internal and external social media channels and online platforms related to INASP's work; online delivery platforms (e.g. AuthorAid, Moodle); websites; internet services and IT provided by INASP.

This policy sets out the expectations for INASP employees, trustees, associates, contractors, interns, volunteers and partners to comply with required behaviours in relation to safeguarding and digital safeguarding.

The same safeguarding principles apply to INASP's programmes and activities, whether these take place digitally or physically. However, there are specific considerations to take into account with online initiatives, as digital technology has brought about new safeguarding issues, see the categories of online risks [here](#). The guidance in this policy, should not be taken as an exhaustive list for digital measures, as the digital world is rapidly evolving. It is important that INASP employees and those working with INASP take full responsibility for the full range of risks and safeguards required as these evolve over time.

INASP has a duty of care to: prevent exploitation and abuse; improve safeguarding capacity; reporting and investigating allegations of abuse; taking action when abuse is identified and supporting survivors.

INASP works through partner organisations to develop their capacity and does not carry out any work directly with children, young people or vulnerable adults. INASP does not currently employ any staff or engage contractors that have a remit to work with children, young people or vulnerable adults. However, INASP partners, associates and consultants include universities whose staff, in addition to working in collaboration with INASP, also teach young people and do research which includes students. Some staff at the universities may also do research with children or vulnerable adults that is not related to INASP project work. Should INASP work engage directly with children, young people or vulnerable adults in future, this policy and associated risks will be reviewed.

This policy will be used in conjunction with related INASP policies, organisational values, and relevant legislation to make decisions about how to respond to any complaints or concerns raised.

Related policies that may be referred to:

- VS01 - INASP Code of Conduct**
- HR01- Harassment and Bullying Policy**
- HR03 – Disciplinary Policy and Procedure**
- VS09 - Data Protection and Information Security Policy**
- VS05 - Whistleblowing Policy**
- IT01– IT and Communications Systems Policy**
- VS08a – Acceptable Use Policy**

Purpose

The purpose of this Policy is to ensure that:

1. **Prevention:** All who work for and on behalf of INASP understand and are well supported in meeting their responsibilities to safeguard children, young people and vulnerable adults from any kind of abusive or exploitative acts, and ensure that all staff, trustees, associates, interns, volunteers and partners understand the importance of being vigilant to safeguarding issues, and how to raise concerns.
2. **Procedure:** We have robust procedures in place to deal with any safeguarding issues that may arise as a result of the actions/behaviours of our staff, associates, contractors, interns, volunteers, or partners working on behalf of INASP.
- **Principles:**
 - Everyone has responsibility for safeguarding and must report concerns; support will be offered where needed to mitigate safety or other concerns related to reporting.
 - Do no harm
 - INASP has a safeguarding duty of care to beneficiaries, project partners; staff, interns, associates, contractors and volunteers, including where projects are delivered with partners.
 - It is INASP's responsibility to communicate the safeguarding policy and process to all staff, associates, trustees, volunteers, interns, partner organisations, consultants / moderators or anyone involved in the delivery of our work.
 - Act with integrity, be transparent and accountable.
 - A child is defined as someone under the age of 18 regardless of the age of majority/consent in country. Young people are defined as aged 15-24 A vulnerable adult is defined as an adult who (a) has needs for care and support, (b) is experiencing, or is at risk of, abuse or neglect, and (c) as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it. Adults considered to be at risk includes, amongst others, people encountering domestic abuse, substance misusers and asylum seekers.
 - All children, young people, adults and vulnerable adults shall be treated equally, irrespective of race, gender, religion/or none, sexual orientation, or disability
 - A safeguarding perspective is applied to promotional communications and fundraising activities
 - Support the people involved in INASP's work to navigate digital spaces and use equipment and digital tools safely and effectively
 - Be proactive in promoting digital safety by giving guidance, and training to staff, trustees, associates, and interns where possible and appropriate
 - As project agreement stage, check partners have their own safeguarding policy training and if they don't, offer appropriate policy and training support.
3. Take action on all safeguarding incidents as soon as INASP is aware of these, including reporting of any incidents as required by the government / Charity Commission.

Policy overview

INASP will not tolerate sexually abusive or exploitative acts of any kind being perpetrated by our employees, trustees, associates, contractors, interns, volunteers, partners, or anyone associated with the delivery of our work. Abuse includes but is not limited to sexual, physical, psychological, or emotional, financial or discriminatory.

Employees, trustees, associates, contractors, interns, volunteers and anyone involved in the delivery of our work are bound to uphold and implement this policy and to report people or incidents that they believe may have contravened it. INASP will ensure that allegations of exploitation and/or abuse for any reason are investigated, and that appropriate disciplinary and reporting measures are taken. INASP also has a duty to provide appropriate assistance to any survivors of exploitation and abuse caused by INASP staff, associates, partners, contractors or the work that we do.

INASP will not tolerate the bullying or harassment of employees, associates, contractors, interns, volunteers, partners or beneficiaries of INASP's work, or any person involved in INASP's work. Any allegations of bullying or harassment will be dealt with under the [HR01 – Harassment and Bullying Policy](#).

We do not dictate the belief and value systems by which employees, trustees, associates, contractors, interns, volunteers, or partners conduct their personal lives. However, actions taken by them out of working hours that are seen to contradict this Policy will be considered a violation of the Policy.

Prevention

4. Recruitment

INASP does not currently employ employees or engage contractors that have a remit to work with children, young people, or vulnerable adults. We do not therefore perform UK Disclosure and Barring Service (DBS) screening before appointment. Should this change and we recruit employees with a remit to work with children and/or young people we will perform DBS checks.

As part of INASP's commitment to prevent safeguarding issues, all application forms, interviews and references must address Safeguarding and equality requirements and attitudes. This will apply to employees, trustees, associates, contractors, interns and volunteers.

All employees, associates, trustees, interns, volunteers and contractors are asked to sign up to the [VS01 - INASP Code of Conduct](#) and to this policy. The Operations Manager are responsible for ensuring that all board members, employees, volunteers, associates and contractors sign the [VS00 - INASP Values and Standards Policy](#) which includes the Code of Conduct.

5. References

All reference requests from former INASP employees, associates, contractors, interns, and volunteers must come through the Operations Manager, as they will have access to information about any potential safeguarding concerns.

6. Training and communication

All new INASP employees, trustees, associates, interns, contractors/moderators and volunteers are given specific safeguarding induction.

At least annually, all employees, associates/moderators, interns, and volunteers will be given refresher training on safeguarding, with opportunities to discuss safeguarding as a team and to review this policy together. Trustees will also be briefed annually on the policy and implementation, together with their role in regard to Safeguarding. A register will be kept to record which employees have received induction and annual refresher training. Training topics will include: what behaviours constitute abuse (including digital behaviours); how to be vigilant to detect abuse; how to respond to disclosure of abuse; reporting abuse.

The Operations Manager is responsible for implementing induction training, annual refresher training, and policy reviews (every 18 months) and that a register is kept. The record will be reviewed by the Safeguarding Lead on the Board annually and as part of risk register reviews.

7. Communication with partners

INASP will ensure that all agreements / contracts with partners / sub-grant recipients:

8. Link to this policy.
9. Include the requirement for all such contracted entities that their employees, associates, and volunteers abide by a code of conduct that upholds the standards of this policy.
10. State that any failure to take safeguarding preventive measures could be grounds for termination of the agreement
11. The Programmes Team will record that they have discussed safeguarding contractual obligations with partners and offered support. A [record](#) of this discussion will be sent to the Operations Manager and recorded in the register.

Additional provisions will be invoked if needed for the specific projects and/or agreement:

12. INASP will offer partner organisations safeguarding training and policy support where work may include children, young people or vulnerable adults.
13. Any partners that are contracted to do work by INASP will also be expected to sign up to our Safeguarding Policy or produce evidence of a similarly robust policy. INASP will keep a record of partner compliance with this requirement.
14. Communication with external project lead/funders/consortium lead

Where INASP are not the lead in a project and are part of a consortium or brought in as a sub-contractor, there should be a conversation about the lead organisation's safeguarding procedures, this should happen for both short-term project (i.e., 1–2-day support) and long-term projects (<months).

This discussion should include receiving a copy of the organisation's safeguarding policy, or a similar robust policy, communication of that policy to stakeholders, and the organisation's procedure for reporting concerns.

15. Risk assessment

Safeguarding is included as a separate risk category where a project plans to or may include work with children, young people, or vulnerable adults. Where this is the case safeguarding will also be included in the organisational risk register as a separate category of risk.

The risk assessment will include clear procedures for the escalation of safeguarding risks.

16. Use of INASP's internet and IT equipment

Use of equipment or internet which has been provided by INASP must follow the [IT01 - IT and Communications Systems Policy](#). In particular the following should be taken into account:

- It is prohibited for anyone to browse, download, access or share content which is illegal, harmful, violent, extremist, exploitative in any way, abusive, offensive or otherwise inappropriate using equipment or internet which has been provided by INASP. If required to do so, such as in the course of carrying out a safeguarding investigation, this will be agreed in advance in writing with the Executive Director and Safeguarding lead on the Board.
- Parameters for acceptable use of equipment are set by INASP and INASP may use software to limit what apps or tools staff, associates, consultants, interns and volunteers are able to access on INASP equipment.
- Equipment provided by INASP ensures that technical solutions are in place to protect the user, e.g., anti-virus, monitoring and filtering software.
- INASP advises, supports and trains how to mitigate risk when using equipment and internet which it has provided.
- INASP will ensure that at the end of individual tenure of IT equipment all personal data will be removed.

17. Use of Social Media and Digital Platforms

Use of social media and digital platforms must follow the [IT02 - Social Media Policy](#).

18. Privacy and Data Protection

INASP has a legal duty to gain informed consent to process and/or share personal data, and to protect the personal and sensitive data of employees, trustees, associates, contractors, interns, volunteers and partners, see [VS09 – Data Protection and Information Security Policy](#).

INASP must take every reasonable precaution to ensure that any digital data or content does not place people at risk or renders them vulnerable to any form of harassment, abuse or exploitation. Research which involves digital elements, such as online surveys or platforms, must be well thought through and appropriate for the context. Special consideration must be given to data protection concerns and mitigating risk to research participants.

19. Governance

The INASP board has ultimate responsibility for safeguarding. The Safeguarding lead at Board level is Simon Kay. The HR & Safeguarding Sub-Committee meets regularly to monitor implementation of this policy, report to the Board via the risk register update, and carry out annual reviews of this policy.

Any issues arising under this policy will be reported to Simon Kay, the Safeguarding Lead on the Board and chair of the HR & Safeguarding Sub-Committee, who will communicate to the Chair of the Board of Trustees.

Procedures and Sanctions

1. Reporting concerns

If a member of employee, trustee, associate, contractor, intern, volunteer, partner or anyone else INASP is working with e.g., researcher, editor or moderator, has any concerns about the behaviour of individuals working for or on behalf of INASP, our partner organisations, or in the communities with which we work, the individual must report their concerns immediately. Concerns and allegations may be based on personal experience, witnessing abuse or hearing about abuse; for further information on types and indicators of abuse please see [here](#).

A report may be made verbally or in writing to your manager, a member of INASP's Senior Leadership, the Executive Director or Simon Kay, the Safeguarding lead at Board level at whistleblowing@inasp.info. Alternatively, the **VS05 - Whistleblowing policy** may be followed, and a report made to whistleblowing@inasp.info. All reports are sent to the designated Safeguarding lead on the Board.

Concerns and complaints can be made anonymously by sending a letter to the INASP, The Old Music Hall, 106-108 Cowley Road, Oxford, OX4 1JE, or by completing this [online form](#).

Every effort will be made to maintain confidentiality throughout the complaints process. Information that identifies individuals involved in a complaint will be limited to essential personnel.

Partners, associates, and contractors are required to report any Safeguarding incidents within their own Organisations to the Project Lead at INASP, if that is not appropriate the issue can be reported to the Executive Director of INASP.

Where INASP employees, associates or partners may have known about abuse but did not raise their concerns, this will be investigated. INASP understands there are barriers to reporting and will support in mitigating these barriers e.g., INASP will not put blame or pressure on victims/survivors to report. Where there is no clear reason why concerns were not raised, INASP may take disciplinary or other appropriate action.

INASP will take action against anyone, whether they are the subject of the complaint or not, who seek or carry out retaliatory action, complainants, survivors or other witnesses, or to impede the reporting or investigation of allegations.

We encourage concerns to be raised without fear of reprisals in the knowledge that those who make a report or who may be affected by abuse will be protected from victimisation.

Where a safeguarding complaint is raised to INASP about other organisations or bodies we do not work with, these will be reported to the relevant body or organisation as appropriate. INASP will not investigate cases related to other organisations but does have a duty to report.

2. Investigate

All allegations and concerns will be investigated promptly by a member of INASP leadership supported by members of the HR & Safeguarding Sub-Committee. The aim of the investigation will be to establish the facts through review of background material and witness statements. Confidentiality will be strictly maintained throughout the investigation.

The safety and dignity of the survivor/victim will be paramount during the investigation. The survivor will be made aware of the support available to them and how to access it.

If the alleged perpetrator is an INASP employee, they may be suspended from work (following the **HR03 - Disciplinary Procedure**) pending the outcome of the investigation. If the alleged perpetrator is an associate/consultant/moderator/board member they may be asked to cease work on behalf of INASP pending the outcome of an investigation.

Where INASP receives a complaint about a partner organisation, INASP will expect the partner to respond safely, quickly and appropriately. INASP will assist the partner to carry out an independent investigation and ascertain its reporting obligations.

3. Outcome

If an allegation is upheld, it will be dealt with by following the [HR03 - Disciplinary Procedure](#).

Any allegations which, after investigation, are upheld are likely to be considered as Gross Misconduct and could result in summary dismissal. Reports may also be made to the authorities for criminal investigation and to funding organisations according to their policies. For complaints involving or related to partners, other actions may be deemed appropriate, e.g., termination of contracts, and/or reporting to relevant authorities.

4. Reporting

The Executive Director will report all breaches of this policy to the Board of Trustees who are responsible for reporting serious incidents to the Charity Commission, funding organisations, auditors, and Local Authorities. The trustees will report any serious incidents that have resulted, or could have resulted in harm (including where this involves partner organisations or others delivering work on INASP's behalf both in the UK and internationally) to the Charity Commission through the ['Report a serious incident' online form](#) and by following UK Government guidance, [report any incidents to the Auditors](#).

A list of UK organisations that, depending on the nature and location of the incident, may need to be informed can be found [here](#).

Further information about safeguarding in the international context and of organisations that support safeguarding can be found on the FCDO website [here](#)

5. Support

Survivors of abuse are entitled to specialised support services. INASP commits to refer survivors to competent support services as appropriate and available and according to the wants and the needs of the survivor. Support may include specialist psychosocial support such as counselling, medical assistance, legal counselling and access to INASP's [R08 - Employee Assistance Programme](#).

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