

Sightsavers Ireland Safeguarding Policy

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Contents

1. Introduction	4
What is safeguarding?	4
2. Target groups of the policy	5
3. Purpose and commitment	6
Principles of safeguarding	6
Children and adults with disabilities	7
Online Safeguarding	7
4. Standards	9
5. Measures to implement the policy	12
5.1 Roles and Responsibilities	12
5.2 Prevention	13
5.3 Reporting and responding to incidents	14
5.4 Implementing, maintaining and reviewing the policy	16
6. Communications	16
7. Associated Policies	18
Annex 1: definitions, acronyms and glossary	19
Annex 2: Incident management procedures	23
Annex 3: Code of Conduct	26
Annex 4: Incident reporting form	29
Annex 5: Permission for collection and use of content	33
Annex 6: Safer Recruitment statement	35
Annex 7: Responding to disclosures of harm or abuse – for representatives	37
Annex 8: Sightsavers Ireland Safeguarding Implementation Plan	38

1. Introduction

Sightsavers is an international development organisation committed to supporting the development of health systems in low and middle-income countries and to advancing the rights and improving the quality of life of people with disabilities. Our programmes include health, education and social inclusion interventions in more than 30 countries worldwide. Many of those benefitting are vulnerable adults¹, children and young people. We do not implement projects primarily on our own but work with a range of partners including government, civil society actors and the private sector. It is primarily our partners who work directly with vulnerable adults and children.

For this reason, Sightsavers is an advocate for following best practice in preventing and addressing safeguarding concerns; and works to build the capacity of its representatives and partners to help strengthen accountability in the sector. It is the responsibility of all Sightsavers staff to promote good safeguarding practice in our work and to share the policy, as appropriate, with external stakeholders.

This Safeguarding Policy provides clear definitions on harm, sets standards across the organisation, and gives guidance on how to apply and implement the policy throughout the organisation and across our programmes. **All Sightsavers representatives must abide by this policy and the Code of Conduct both within and outside of working hours** (Annex 3).

What is safeguarding?

Safeguarding means promoting and protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means identifying and minimising the risk of harm to children and adults from our representatives, partners and programme activities. Our approach to safeguarding includes responding appropriately to any safeguarding concerns about children and adults within communities where we work. **A safeguarding concern can be any concern of harm, exploitation or abuse that has occurred or will occur if no action is taken.** Our approach to minimising the risk of harm entails a wide potential range of policies, procedures and activities seeking to address the safety and wellbeing of project participants, partners and representatives.

In Sightsavers' case, a safeguarding approach means minimising the risk of harm, exploitation or abuse of children and adults from staff, operations and programme activities. It includes reporting any safeguarding concerns about a child or adult within communities where we work to the appropriate referral authorities. This policy focuses on addressing those risks by developing standards and mitigating measures to target and reduce residual risk, particularly to groups at increased risk of harm, such as children and adults with disabilities.

¹ A vulnerable adult (HSE 'Safeguarding Vulnerable Persons at Risk of Abuse – National Policy and Procedures' (2014)) is an adult who, as a result of physical or intellectual impairment, may be restricted in capacity to guard himself / herself against harm or exploitation or to report such harm or exploitation.

Children and adults with disabilities are at particular risk of harm, exploitation and abuse, so this policy and our programme work aims to address these risks through an inclusive safeguarding approach, with specific actions focused on protecting and promoting the rights of children and adults with disabilities.

Our aim as an organisation is to “do no harm.”

2. Target groups of the policy

The Safeguarding Policy is to be applied across all organisational activities and in all of Sightsavers’ programme themes, including health, education, social inclusion and research. All Sightsavers’ representatives and partner organisations² should be aware of and adhere to the policy. Sightsavers’ representatives are defined as trustees, employees (permanent or temporary), consultants, volunteers who work directly for Sightsavers and donors travelling on Sightsavers business.

In addition to complying with the policy all representatives must sign and will be held accountable to Sightsavers’ Safeguarding Code of Conduct³. Harm can be caused by men, women and children linked to Sightsavers work and we ask all representatives to report any incidents or concerns they have.

First and foremost, it is expected that partners will have policies and procedures in place covering safeguarding in order for Sightsavers to enter into partnership. This will not always be the case as the start of a partnership, particularly with grassroots civil society partners. Where partners do not have appropriate policies, but it is deemed essential that Sightsavers work with them, policies will be developed as part of the early stages of the partnership, led by the due diligence process.

It is recognised that, for government partners in particular, national policy and legal frameworks take precedence. However, where the national legal framework is considered weaker than Sightsavers policy, it may be a specific national advocacy activity to strengthen that framework, particularly with regards to provision for children and adults with disabilities. Safeguarding at a community level will be embedded into project design for such cases, to ensure people are aware of their rights to not be harmed and have access to accessible reporting mechanisms.

Sightsavers is unable to enforce the policy with independent, external agencies, such as partner organisations. However we can choose not to work with partners, put specific conditions into partnership agreements, or end partnerships based on partners’ policies and their implementation of these, including safeguarding.

² Partner organisations here are defined as those included within Sightsavers’ Partnership Policy

³ See Sightsavers Code of Conduct for Representatives, included as Annex 3

3. Purpose and commitment

The purpose of this policy is to ensure that Sightsavers activities are implemented in a safe and protective environment where harm, exploitation and abuse are effectively prevented, as far as reasonably possible and responded to effectively.

The policy has three specific objectives:

1. Keeping children and adults safe.
2. Ensuring the highest standards of behaviour from representatives and minimising the risk of abusers entering the organisation.
3. Safeguarding the reputation of Sightsavers, including guarding Sightsavers' representatives from false allegations or from operating within an unclear framework.

Sightsavers is committed to doing whatever we can to keep everyone safe, with a specific focus on children and people with disabilities. Sightsavers' work is guided by:

- the UN Convention on the Rights of the Child (CRC), with specific reference to article 19 on protection from all forms of violence, injury, exploitation, abuse, neglect, mistreatment and sexual abuse; and
- the UN Convention on the Rights of Persons with Disabilities (CRPD) including its special provisions for the protection of children with disabilities from cruel, inhuman or degrading treatment or punishment (article 15) and exploitation and abuse, including gender-based violence (article 16).
 - the recognition of the rights of children and adults with disabilities to access services, justice, and full participation in their communities, in line with the CRPD. This means that effective safeguarding from the additional risks faced by those with disabilities must not include preventing them from accessing these rights.
- African Charter on the Rights and Welfare of the Child which commits to protect the child from all forms of torture, inhuman or degrading treatment and especially physical or mental injury or abuse, neglect or maltreatment including sexual abuse (article 16)

In all activities involving children, including fundraising, communications and programme activities, primary consideration should be given to children's rights, following the four key principles of the CRC, namely, the "best interest" of the child, the child's right to life and development, the child's right to be heard/participate, and the child's right to non-discrimination.

Principles of safeguarding

Sightsavers is committed to the six key principles that should underpin all safeguarding functions, actions and decisions, in line with global organisational policy. These principles are relevant for both child and adult safeguarding.

1. **Empowerment.** People being supported and encouraged to make their own decisions and informed consent.
 2. **Prevention.** It is better to take action before harm occurs.
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3. **Proportionality.** The least intrusive response appropriate to the risk presented.
4. **Protection.** Support and representation for those in greatest need.
5. **Partnership.** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
6. **Accountability.** Accountability and transparency in delivering safeguarding.

Children and adults with disabilities

Sightsavers has a specific mandate to protect and promote the rights of people with visual impairment and is increasingly involved in direct support to other people with disabilities.

Recent research on child protection and disability⁴ has found that children with disabilities experience far higher levels of abuse than their peers. Girls and boys with different impairments are vulnerable to many forms of abuse but most at risk are children with intellectual impairment and communication difficulties. Emotional and sexual abuse are mostly reported by girls with disabilities, but boys with disabilities are also targeted.

Negative cultural norms around disability contribute to putting people with disabilities at risk of violence and abuse, including factors such as stereotyping, prejudice, discrimination, isolation, difficulty in protecting oneself or inadequately understanding and/or communicating that abuse has occurred. People with visual impairments are especially vulnerable as they are dependent on tactile guidance. They are also likely to be particularly vulnerable in care situations, where they require assistance with toileting, dressing, bathing etc.

Sightsavers will work with its programme partners to make sure that the particular risks of harm, exploitation or abuse facing people with disabilities will be properly assessed, addressed and monitored within the local context where Sightsavers' partners operate.

Sightsavers commits to communicating this policy throughout the organisation, to partners and, where relevant, to children themselves, their parents and other beneficiaries in programme activities; as part of a broader programme to challenge stereotypes and cultural norms around disability, particularly with regards to children's potential and rights. Sightsavers is also committed to developing and improving accessible reporting mechanisms with and for children and adults with disabilities.

Online Safeguarding

What is online safeguarding?

Online safeguarding is the protections we put in place as an organisation to ensure our representatives or online activities do not harm, exploit or abuse any individual connected to the work of Sightsavers. At Sightsavers we aim to do no harm, this applies to interactions both in person and online. Sexual and Emotional abuse can take place online, and technology can be used to facilitate offline abuse.

⁴ Plan International 2016 "Protect Us"- inclusion of children with disabilities in child protection

Our commitment

Sightsavers is committed to ensuring that no materials produced or shared by our organisation or representatives online are harmful, exploitative, or abusive. This includes the following examples: violent, hateful, pornographic, sexual, racist, discriminatory, sexist, blasphemous (IT usage policy), obscene, indecent, derogatory, or biased behaviour. We aim to do no harm in person and online.

The code of conduct for representatives, which is Annex 3 in the Safeguarding Policy outlines all forms of harm, exploitation and abuse which is prohibited by the organisation. This extends to harm, exploitation, and abuse online.

All Sightsavers staff and consultants must abide by the following policies, where more information on safe online conduct is outlined:

- Social Media policy
- IT usage Policy
- Data protection Policy
- Ethical content collection policy

No person should be harmed through the online activities of our representatives or organisation. This includes use of all forms of social media including Facebook, YouTube, twitter, Instagram, LinkedIn and all other social networking sites and internet postings, including blogs. Online safeguarding standards are outlined in the Ethical content collection guidance, IT Usage Policy and Social Media Policy.

In line with Sightsavers' Ethical content collection guidance, all programme participants must fully understand how, where and why we will use their content and understand any potential consequences of the content being made public or used online.

The IT Usage Policy applies not only to Sightsavers equipment, but also for any personal devices you use for work purposes. In line with the policy, all representatives are prohibited from sending racist, sexist, blasphemous, defamatory, libellous, obscene, indecent, or abusive messages on our computer system, either internally or externally. All Sightsavers' representatives are also prohibited from viewing, purchasing or downloading any pornographic material or sexual services on Sightsavers' computer systems, this includes photos, cartoons, drawings, text and any other forms.

4. Standards

Standard and aim	Specific areas of activity / indicators
<p>Awareness and communication: All Sightsavers representatives are aware of the policy and the organisation communicates its approach to key stakeholders</p>	<ul style="list-style-type: none"> • All Sightsavers representatives are responsible for complying with the policy and code of conduct, including following all reporting and response procedures outlined. • Sightsavers representatives⁵ will be introduced to the policy and sign the code of conduct as part of their induction, contracting or ongoing management process. • All partner organisations must receive a copy of the policy and code of conduct as part of the development of any Memorandum of Understanding (MoU) or Project Funding Agreement process (PFA). • Sightsavers will communicate the policy through its website and directly to core stakeholders⁶, to demonstrate its commitment and the importance of the policy • In particular, Sightsavers will participate in discussions on safeguarding children and adults with disabilities, in order to improve a sector-wide response to safeguarding these individuals.
<p>Working in partnership to safeguard children and adults: All Sightsavers partners will have policies and procedures in place covering safeguarding</p>	<ul style="list-style-type: none"> • Sightsavers will only enter into an MoU or PFA with organisations that either have these in place, or are committed to developing them, based on Sightsavers' policy, as an integral part of the partnership and where specifically mentioned within the PFA. This will be assessed during the due diligence process. • Where a partner's policies and procedures are less strong than Sightsavers, and where they do not address issues of those with disabilities specifically, consideration will be paid to advocating for and providing technical support to strengthening of the policy. • Assessment of risks to children and adults are included as a specific part of the project development or inception phase of every project, using the approved PDP toolkit.

⁵ Sightsavers' employees, permanent and temporary, consultants and volunteers employed by Sightsavers

⁶ To include, but not limited to: DFID, Irish Aid, European Commission, World Bank, Gates Foundation, USAID, WHO, select INGO partners (Fred Hollows Foundation, International Disability Alliance, ADD International etc), Comic Relief, Big Lottery Fund, selected major donors, Merck, Pfizer, Unilever, Standard Chartered Bank.

Standard and aim	Specific areas of activity / indicators
<p>Putting the policy into context: All Sightsavers countries apply and implement the policy</p>	<ul style="list-style-type: none"> • Each office location has a Designated Safeguarding Lead (DSL) in place with clear responsibilities for coordinating the implementation of the policy; running safeguarding training with staff and partners; advocating safeguarding on our projects; and mapping the local / external context (including legislation) for safeguarding in the country safeguarding plan. • Each DSL will work with the Global Head of Safeguarding (GHoS) and Country Office to assess any contextual incident management processes, including legislation and third party survivor support services. • Country procedures will be reviewed each time the global policy is reviewed, instigated by the GHoS, or a specific incident occurs or the national legislative environment changes, instigated by the DSL.
<p>Putting the policy into practice I: Recruitment, selection and training</p>	<ul style="list-style-type: none"> • Sightsavers will ensure safeguarding is part of any relevant job description. This will include all positions reporting into the CEO, as well as specific positions where employees have safeguarding responsibilities. • Recruitment processes for these employees will include relevant questions on safeguarding. All roles must be conducted in line with our global recruitment practice, which includes obtaining references for candidates. • Sightsavers will provide necessary training and support to representatives to ensure effective implementation of the policy. • Sightsavers will ensure that the GHoS and the DSL have the capacity and capability to fulfil their roles. We will do this through training, support and the revision of roles and responsibilities.
<p>Putting the policy into practice II: Safe programme design and risk mitigation</p>	<ul style="list-style-type: none"> • Specific programme guidance will be developed for each thematic area: inclusive education; social inclusion; eye health and NTDs, by the relevant Global Technical Lead (GTL) or Technical Advisor, working with the Safeguarding team. This should be developed in consultation with children and adults or their representative organisations to ensure it is robust and responsive to actual needs • Safeguarding risks and mitigations will be identified for all new projects as part of the risk assessment process, during either the Project Design Process (PDP) or the induction phase, with a specific section on children and adults with disabilities in all cases.

Standard and aim	Specific areas of activity / indicators
	<ul style="list-style-type: none"> • A risk assessment will also be conducted for any other activity directly involving adults at risk and/or children, including fundraising and communications activities where contact is made and information on individuals is gathered. • The risk assessment will include mitigating actions, which will be incorporated into project design/documentation. This may include supporting training of partner staff. • A global safeguarding risk register is maintained by the Global Head of Safeguarding • Safeguarding risks are identified and updated in the organisational risk register by the Director of Legal, Governance and Assurance.
<p>Putting the policy into practice III: Communications activities</p>	<ul style="list-style-type: none"> • Sightsavers representatives will ensure that appropriate consent is obtained before images or stories of adults and children are captured or shared. • Sightsavers will never use more than two of these pieces of information together: individual's full name, precise location and photo. • Sightsavers will ensure that adults and children are represented in an appropriate way that does not victimise or sexualise them. • Sightsavers will only collect data on individuals for a specific authorised purpose and it will only be used as intended. It will be stored in a way that complies with relevant legislation and our own data protection procedures. • Any breaches to the security of personal data must be reported and acted on immediately. • Sightsavers staff will not use Sightsavers equipment to view, share or access illegal or inappropriate material, including any that specifically includes children.
<p>Reporting and responding to child safeguarding incidents:</p>	<ul style="list-style-type: none"> • Reporting and incident management procedures are in place to handle concerns of suspected harm, exploitation and abuse. These are communicated to staff in training, via email communications from the CEO, on our website and via our intranet. • All Sightsavers representatives must also follow appropriate and relevant national legislative and criminal reporting procedures as advised by the DSL, GHoS and Director of Legal Governance and Assurance.

5. Measures to implement the policy

The safeguarding policy requires the following steps for its implementation.

Staffing including the designation and training of a Global Head of Safeguarding (GHoS), Safeguarding Team and Designated Safeguarding Lead (DSL) in each country office.

Prevention measures including awareness raising, training of relevant staff, risk analysis, recruitment procedures, induction of staff in the policy and codes of conduct for Sightsavers' representatives and incorporation of the policy into relevant existing systems.

Reporting and responding measures including steps for alerting and reporting safeguarding concerns, investigation and incident management, duties and responsibilities of assigned managers and Designated Safeguarding Leads.

Implementing and maintaining the policy, including training and capacity building of staff and partners, monitoring, reporting and review of the policy.

5.1 Roles and Responsibilities

Global Head of Safeguarding (GHoS) and Designated Safeguarding Leads (DSLs)

Sightsavers has a Global Head of Safeguarding at international level, supported by a Safeguarding Team from 2022 and Designated Safeguarding Lead's to cover all countries of operation (these may be based in global teams outside of the country where relevant). Safeguarding responsibilities are included in the job descriptions of all of the aforementioned safeguarding staff. Each DSL has safeguarding responsibilities accounting for 10% of their time, with the workload of those staff being adjusted to reflect safeguarding activities. The selection of the DSL is undertaken in discussion between the most senior staff member in each country and the GHoS. In countries where Sightsavers has no office a staff member responsible for managing the local partner programme will be assigned. Sightsavers will not allocate this role to a non-staff member. The contact details of the DSL must be included on all country information documentation provided to visitors to the country.

There are two fundamental aspects to these roles, with specific levels of responsibility within each for the GHoS and each DSL:

1. To build the understanding and capability of the organisation required to implement this policy. This will include direct knowledge and information transfer and accessing appropriate external expertise.
2. To initiate the reporting mechanism for any safeguarding concern and use lessons learned from specific incidents to improve policy and practise.

Sightsavers will ensure sufficient time is given to the GHoS and DSLs to acquire the necessary skills and knowledge and to undertake the above activities. Line managers will recognise the priority of DSL roles in incident reporting and response when an incident occurs, and the dual reporting line required for this area of work.

In addition, each country office will have a designated safeguarding “incident management group” (consisting of the Country Director, the DSL and an additional senior manager where available), as and when incidents occur.

The members of this group may need to be adapted in response to the specific nature of a safeguarding concern or incident.

5.2 Prevention

Staff recruitment

All recruitment of staff will include a full online induction to the safeguarding policy and code of conduct, including procedures to follow should any safeguarding concern arise.

When recruiting staff, Sightsavers will make sure that questions regarding safeguarding are included in any relevant job interviews, and that any roles with safeguarding responsibilities have those responsibilities explicitly outlined within the job description. Where possible, references should be sought from previous employers to get more information of the suitability of candidates.

According to the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 – 2016, the vast majority of roles at Sightsavers are ineligible for Garda Vetting. Access to or contact with vulnerable adults and children is not a necessary or regular part of any of our staff member’s direct responsibilities. Our programmes are developed and delivered with partner organisations, and it is our partners who provide services, and work directly with beneficiaries.

On the rare occasion that a role at Sightsavers would qualify for Garda Vetting, this will be undertaken as part of the recruitment process. Our Safer Recruitment statement (see Annex 6) outlines our approach to recruitment in more detail.

All Sightsavers representatives will be required to acknowledge receipt of and compliance to the Safeguarding Policy and sign up to the Code of Conduct prior to their employment.

Awareness

Sightsavers will designate staff with the responsibility of building internal awareness and supporting relevant capacity development of the organisation in safeguarding, as detailed in section 5.1 of this policy. All Sightsavers’ representatives and partner organisations will be duly notified of the Safeguarding Policy and be made aware of how they will be expected to comply with it. The policy will be translated into the appropriate national languages where Sightsavers operate. It will be the responsibility of all Sightsavers staff to share the policy and approach as relevant to external stakeholders.

Sightsavers will provide mandatory online training to all staff and trustees and will provide in person training to Country Office staff and partner organisations to enhance understanding and ensure effective implementation of the policy.

Sightsavers’ country offices will be requested to review and analyse their country context and produce a local plan outlining how they will operationalise the policy in their context. Implementation processes may therefore differ from country to country, but in all circumstances, the policy and code of conduct will remain the same. If any situations arise

where national legislation conflicts with the policy, the country office must raise and discuss this with the Global Head of Safeguarding.

Sightsavers will ensure all supporters, donors, sponsors and media representatives involved with Sightsavers work have access to the Safeguarding Policy through its website and will take appropriate steps to communicate that availability.

Risk analysis

When working with partners, Sightsavers will endeavour to ensure that the programmes it supports are safe for the adults and children they serve. To ensure that appropriate safeguarding measures have been put in place, Sightsavers will work with the partner, either during the project development process, or the inception phase, to carry out a safeguarding risk analysis which specifically includes any safeguarding issues and propose actions to mitigate these risks, prior to the activities taking place, in line with the Due Diligence Action Plan.

Such risk analysis will be an integral part of project proposals, programme planning guidelines and partnership assessment tools.

Code of Conduct

All Sightsavers representatives are required to understand their responsibility to keep vulnerable adults and children safe, and to sign and abide by the Sightsavers Code of Conduct (Annex 1), which lists acceptable and unacceptable behaviour, primarily designed to safeguard others. It also serves to guard the name and reputation of Sightsavers and its representatives from false accusations. All staff are responsible for encouraging and promoting the implementation of the Code of Conduct.

The adherence to this code is mandatory for all Sightsavers' representatives. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant legal action. To give maximum protection to beneficiaries, the organisation and staff, the Code of Conduct is to be applied both within and outside of working hours.

All partners and suppliers in turn must sign a separate Code of Conduct at the stage when contracts are agreed and signed.

5.3 Reporting and responding to incidents

A safeguarding concern can be any concern of harm, exploitation or abuse that has occurred or will occur if no action is taken. Such concerns may relate to harm as a result of a project or as a result of the conduct of a Sightsavers or partner representative. See annex 1, definitions for more details on harm which is prohibited by Sightsavers. For guidance on receiving and responding to safeguarding concerns, see annex 6.

All concerns can be reported via the following mechanisms:

- Report directly to a Designated Safeguarding Lead or Sightsavers staff member
- Report a concern to the safeguarding mailbox, managed by select global staff with safeguarding responsibilities, safeguarding@sightsavers.org

- Via our Speak up reporting tool: <https://www.sightsavers.org/how-were-run/accountability-and-transparency/speakup/> (concerns raised here can be done so anonymously and toll free phone lines are available)

Sightsavers will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case. Sightsavers' representatives should be properly informed of the reporting and incident management procedures. Any Sightsavers representative who has a concern or suspicion regarding harm, exploitation or abuse by someone representing Sightsavers or another agency must report such concerns to the Global Head of Safeguarding or Designated Safeguarding Lead.

Confidentiality

All reports and the information herein will be handled with strictest confidentiality to protect the identity of the individuals concerned, the informer and the accused, both appropriately and in accordance with relevant British or other national legislation. In cases where someone is deemed to be a risk to themselves or others, Sightsavers may need to disclose someone's identity in order to report the concern to an appropriate body for support.

Procedures to be followed in the case of an incident

Agreed procedures to be followed are outlined in Annex 2.

Consequences of harm, exploitation, or abuse

Any behaviour towards children or adults, which results in harm, exploitation or abuse, or the failure to follow the general requirements and specific code of conduct of this policy, is grounds for the following measures:

- **Representatives:** If an employee has been under investigation by Sightsavers or by official law enforcement authorities for any area of harm, exploitation or abuse as defined under this policy, they will be subject to employee disciplinary procedures. Under these procedures they may be temporarily suspended during the investigation. If an employee is dismissed for proven harm, exploitation, or abuse, Sightsavers will inform the relevant authorities, disclose this to prospective future employers and/or refuse a reference, depending on details.
- **Consultants:** If a concern is raised alleging that a consultant contracted by Sightsavers was found to be in breach of the Code of Conduct or Safeguarding Policy, this would be reviewed and investigated by Sightsavers' HR and Safeguarding teams, who would then make recommendations on appropriate action, such as termination of contract and referral to appropriate 3rd parties.
- **Trustees:** If a concern is raised alleging that a Sightsavers' trustee was found to be in breach of the Code of Conduct or Safeguarding Policy, this would be raised with the Chairperson, to be reviewed and investigated. Once investigated, recommendations on appropriate action would be submitted to the global Board for approval.
- **Partner organisations:** Appropriate action will be taken up to and including immediate termination of a partnership or service agreement. In this case, the short or long-term impact on beneficiaries of the termination of a partnership will be considered.

5.4 Implementing, maintaining and reviewing the policy

Sightsavers will integrate safeguarding measures into relevant core internal processes and tools such as programme technical guidelines, partner assessments and agreements, training modules, programme design, monitoring and accountability systems and recruitment procedures.

Sightsavers will make sure that proper induction and training in safeguarding will be made available to all staff, permanent and temporary, consultants and volunteers. The GHoS and DSLs will receive additional training in order to manage their responsibilities for rolling out, managing and coordinating the safeguarding policy and procedures.

Where relevant, Sightsavers will support partner organisations by including relevant training and technical advice to build capacity in the field of safeguarding, with a particular focus on children and adults with disabilities.

The policy will be monitored on a regular basis by the designated GHoS and the DSLs. An annual summary report, including all concerns received, will be submitted by the GHoS to senior management. Any findings requiring a change in policy will be discussed at Global Council.

Each Sightsavers country will develop an annual implementation plan for the policy, including actions to be taken, details of the FSP and country safeguarding reference group and relevant policy amendments adopted.

Review

A full policy review should take place every three years, instigated and led by the GSoH, to include a review of external changes to safeguarding standards that apply nationally and internationally.

6. Communications

Sightsavers is committed to adhering to ethical guiding principles on communications to minimise the risks of people misusing photographs and related information beyond the agreed purpose and consent. The best interests of the featured adult or child are to be safeguarded as a primary consideration. To this effect, Sightsavers' representatives and partners will abide by the following guidelines (please refer to the ethical content policy for more detail).

- Ensure all interviews and images of adults and children are undertaken with sensitivity to safeguard the individual's rights to dignity, identity, confidentiality, and privacy. Where possible individuals should be prepared for interviews prior to being interviewed. In the case of children, a parent or guardian should be present during interviews, where appropriate, or their permission sought beforehand for a professional adult with agreed responsibility (such as medical or educational professionals) to be present on their behalf.
 - Pictures of adults and children should be decent and respectful and should not stigmatize community, family, or the individual. All children, both girls and boys, should wear decent clothing appropriate to the local custom.
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- Prior consent to use information collected in interviews and / or images of adults and children should be obtained from the individual themselves (if they possess the maturity to do so), and in the case of children, consent must also be obtained from their parents and/or guardians⁷. To help keep adults and children safe, consideration should be given to how much information is published. See the triangle of risk principle below.
- Sightsavers and its partners are committed to guard carefully any information about adults and children who feature in their publications, ensuring that their personal data are used appropriately. This also applies when material is made available to third parties. Full names should never be provided alongside other identifiers such as date of birth or community.
- Pictures, materials and personal information regarding individuals will be held in a secure database and according to the appropriate Sightsavers data security protocols. Access to these materials will be employees only through a password-protected system. The misuse of images accessed will be treated in the same way as other breaches of this policy. Applicable data protection laws for all stored images will be followed.
- Safeguarding is our priority when gathering stories, and we undertake rigorous procedures to remove or minimise any risk to the people we portray. We would not have the impact that we need if we never showed a persons' face, but that inevitably carries a degree of risk since a persons' face is traceable, particularly in an online world with ubiquitous access to information.

How do we minimise the risks?

- The **triangle of risk principle** is used, and we will never give any more than two of these pieces of information together: a persons' full name, image and location (exact location like school or village cannot be used - district can be used without counting as location information).
- In certain circumstances, and in consultation with the contributor and/or their family, we will also change a persons' name or use unidentifiable/partial imagery to further protect them.
- Sightsavers will review the appropriate use of images on a case-by-case basis, with the safety and wellbeing of the person being portrayed at the forefront.

⁷ See permission form in Annex 5

7. Associated Policies

- Whistleblowing Policy
- IT Policies
- Ethical Content Collection Policy
- Social Media Policy
- Modern Slavery Statement
- Sightsavers Ireland Safeguarding Policy
- Sightsavers India Safeguarding Policy

Annex 1: definitions, acronyms and glossary

Definitions

Child

The term 'child' has the specific legal meaning of anyone below the age of 18 years (as defined by the United Nations Convention of the Rights of the Child 1989).

Adult

The term adult therefore refers to anyone aged 18 years or over.

Vulnerable adult

A vulnerable adult (HSE Safeguarding Vulnerable Persons at Risk of Abuse – National Policy and Procedures' (2014)) is an adult who as a result of physical or intellectual impairment, may be restricted in capacity to guard himself / herself against harm or exploitation or to report such harm or exploitation.

Abuse

Abuse occurs when an individual or individuals hurts another adult or child, either physically or mentally. In the majority of cases, the abuser is someone the victim knows well, such as a parent, other caregiver, relative or friend. Abuse can be intentional or unintentional. There are several forms of abuse including:

Physical abuse: Physical abuse is causing deliberate injury to a person, however slight. This may involve hitting, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing or attempting to cause physical harm to a person. Physical harm may also be caused through the misuse of medication, restraint or inappropriate sanctions (for example, corporal punishment) or being given alcohol or a substance that is known to cause harm.

Emotional/psychological abuse: Emotional or psychological abuse is the emotional ill-treatment of a person that adversely affects their wellbeing or development. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone. It includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks. Other harmful experiences such as frequently being forced to witness violence in their domestic environment are also classified as emotional abuse.

Neglect: Neglect is the continuing failure to prevent harm that damages or impairs health and/or development by not meeting a person's basic physical and/or psychological needs. This includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, withholding medication, inadequate hygiene, nutrition, housing or heating, or preventing someone from interacting with others. Neglect of children and adults with disabilities is more common than neglect of those without disabilities and is often under-reported. In an international development context, some of the individuals Sightsavers works with may experience some form of neglect to basic needs.

Professional judgement is needed to decide whether the experience of neglect is intentional or due to material deprivation and should be based on the severity of the neglect and how the individual is being treated relative to their peers in the community and wider cultural norms.

Sexual abuse: Sexual abuse is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, inappropriate sexual contact, or exposure to inappropriate material.

Any kind of sexual activity involving a child constitutes sexual abuse, whether or not the child is aware of, or consents to, what is happening. This includes rape, incest, fondling genitals, masturbation, voyeurism, exhibitionism, exposing a child to adult sexual material, or making them take part in any sexual activity, real or simulated, whether face-to-face, online, or in any other medium.

Financial or material abuse: Financial or material abuse is the theft or misuse of a person's property or assets. This includes money being withdrawn or stolen, goods or services purchased in someone's name without their consent, being deliberately overcharged for goods or services, misappropriation of property, possessions or benefits, or money being borrowed by someone who is providing a service to the vulnerable person.

Discriminatory abuse: Discriminatory abuse is repeated, ongoing or widespread discrimination due to a person's age, sex, gender, disability, racial heritage, religious belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy and maternity. This can include unfair or less favourable treatment, sexual or gender preference, slurs, harassment, name-calling, breaches of civil liberties, and unequal access to health or social care.

Organisational abuse: Organisational abuse is the mistreatment, abuse or neglect of children or adults by an organisation or its personnel. It can take place within settings and services that children or adults live in or use, and it violates their dignity, resulting in a lack of respect for their human rights. It can take the form of an organisation failing to respond to or address incidents of poor practice brought to its attention.

Exploitation: Those who want to exploit children and adults will seek out those who are in vulnerable circumstances to use them for their own purpose, activity, or gratification. This could be financial, commercial, sexual, or related to extremism and terrorism. Exploitation involves a process of grooming; when someone builds an emotional connection with a child or adult to gain their trust for the purpose of exploitation. They may also manipulate their environment, so they become isolated from those who could help or support them. Those affected may not realise they have been groomed, or that what has happened is abuse.

Types of exploitation include:

- **Sexual exploitation:** a type of sexual abuse in which children or adults are sexually exploited for money, power, or status. Some children and adults are trafficked into or within a country for this purpose. They may be tricked into believing they are in a loving, consensual relationship. Abusers will use various means to gain compliance such as drugs, alcohol, gifts, threats and bribes.

- **Modern slavery (human trafficking):** this includes forced labour, domestic servitude or coercing, deceiving and forcing an individual into a life of abuse. People are trafficked for sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft, and illegal work. Some people are coerced, but most are trapped in subversive ways. For example, promised education or ‘respectable’ work in restaurants or as domestic servants, or parents may be persuaded that their children will have a better life elsewhere.
- **Radicalisation:** the process by which those who are vulnerable come to support terrorism or violent extremism and, in some cases, to directly participate in or support terrorist groups. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. It may follow experience of racism or discrimination. They believe that joining a movement offers social and psychological rewards such as adventure, camaraderie, and a heightened sense of identity.

Harmful traditional practices: Harmful traditional practices are forms of violence which have been committed (primarily against women and girls) in some communities and societies for so long that they are considered, or presented by abusers, as part of accepted practice. Such traditions include Female Genital Mutilation (FGM) and forced early marriage. They may also include different forms of ritual ceremonies involving individuals in harmful religious or spiritual activities. Children and adults with disabilities may be at higher risk of becoming victims of witchcraft beliefs in certain contexts for example individuals with albinism.

Acronyms/glossary

Best interest of the child

An overarching principle in the Convention on the Rights of the Child:

“in all actions concerning children, whether undertaken by public or private institutions, the best interest of the child should be a primary consideration. In all matters affecting the child, the views of the child should be seen as important and given due weight in accordance with the age and maturity of the child.”

Child and adult protection

Child or adult protection is specifically about the steps and measures an organisation or society puts in place to protect individuals identified as either suffering, or likely to suffer from harm, exploitation, and abuse.

Safeguarding

Safeguarding means promoting and protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means minimising the risk of harm to children and adults from staff, representatives and

partners; our operations and programme activities including and includes responding appropriately to any safeguarding concerns about children and adults within communities where we work.

Survivor

A person who has been harmed, exploited, or abused by a Sightsavers representative, Programme, or representative from one of Sightsavers' partner organisations.

CRC: The UN Convention on the Rights of the Child (1989)

CRPD: The UN Convention on the Rights of Persons with Disabilities (2008)

DSL: Designated Safeguarding Lead

GHoS: Global Head of Safeguarding

Sightsavers representatives

Sightsavers' employees, permanent and temporary, consultants and volunteers employed by Sightsavers.

Safeguarding concern

A safeguarding concern is when someone is worried about the safety or well-being of a child or adult because of something seen or heard, or information that has been given to them. A safeguarding concern can involve a Sightsavers representative, or a representative from another organisation, endangering the safety or wellbeing of others, for example, by not following the code of conduct.

Annex 2: Incident management procedures

Procedures to be followed in the case of an incident

All concerns can be reported via the following mechanisms:

- Report directly to a Designated Safeguarding Lead or Sightsavers staff member
- Report a concern to the safeguarding mailbox, managed by select global staff with safeguarding responsibilities, safeguarding@sightsavers.org
- Via our Speak up reporting tool: <https://www.sightsavers.org/how-were-run/accountability-and-transparency/speakup/> (concerns raised here can be done so anonymously and toll free phone lines are available in many countries and languages)

Incident management process:

1. A safeguarding concern is reported to Sightsavers using one of the above mechanisms and escalated to the Global Head of Safeguarding.
2. Global Head of Safeguarding confirms receipt of concern, logs it in the safeguarding incident log and organises a meeting with a small number of internal stakeholders, to establish the facts and decide on next steps to be taken. This might be an investigation, creation of an action plan or both.
3. If the concern is deemed “serious” then the safeguarding focal group will be formed, including a small number of representatives from the country office, safeguarding team, programme team, institutional funding team and media where appropriate. **Nobody involved in this group should be the person of concern.** The following steps are taken:
 1. Identify the wishes and needs of the survivor
 2. Agree on immediate next steps to ensure the safety of the survivor(s), whistleblower(s) and in some cases, person(s) of concern.
 3. Outline an action plan/investigation plan
 4. Senior Management are informed by the safeguarding focal group and updated at appropriate points throughout the incident management process.
 5. The Chief Executive or delegated staff member will inform the Chairman, Vice Chairman, Treasurer or Chairman of the Audit Committee, upon receipt of incident details from the safeguarding focal group by email. They are updated at appropriate points throughout the incident management process by email.
 6. Provide a report to the Charities Regulatory Authority, in line with our obligations as an Irish registered charity.
 7. Inform other key stakeholders, such as donors, in line with our contracts.
 8. Decide whether a misconduct investigation should be initiated. If so, decide whether this should be led internally or by external investigators.

9. Carry out a risk assessment before an investigation is commenced and review this on a regular basis throughout an investigation.
10. Complete an investigation
11. Share investigation outcome with survivor, whistle-blower, safeguarding focal group and select external regulatory bodies, such as donors and charity commission.

No identifying information (e.g. names) will be shared with external stakeholders, unless someone is deemed to be at risk of serious harm. We aim to maintain confidentiality at all times.

4. If the concern does not meet the criteria for “serious” safeguarding concern, the safeguarding focal group will take the following steps:
 1. Agree on immediate next steps to ensure the safety of the survivor(s), whistle-blower(s) and in some cases, person(s) of concern.
 2. Safeguarding point of contact on the UK board is informed on a biannual basis on all actions taken against non-serious incidents by the Global Head of Safeguarding and Director of Legal, Governance and Assurance.
 3. Inform other key stakeholders, such as donors, if the status changes at any point, in line with our contractual obligations.

Role of the Safeguarding Focal Group:

Once assembled, the safeguarding focal group will determine the immediate steps to be taken including, in all cases the wishes and needs of the survivor should be front and centre in informing any decisions made.

Support for survivors and whistle-blowers:

- Sightsavers will aim to refer survivors to support services such as medical, psycho-social counselling or legal support, where safe to do so and appropriate.
- Sightsavers will aim to refer whistle-blowers to legal and psycho-social support services, where safe to do so and appropriate.
- Monitoring and reporting on the progress of the investigation and providing information and guidance as appropriate.
- Share outcome of any investigation

What happens if the survivor or person of concern is a Sightsavers’ staff member?

- Determine if an internal investigation is required and if the matter is viewed as a breach of this policy, including whether disciplinary procedures should be invoked.
- Support can be provided to staff, such as psychosocial and medical support.

What happens if the survivor or person of concern is a representative of a partner organisation?

- Any breach of the Partner Code of Conduct will be treated as a breach in contractual partnership.

- Where appropriate, Sightsavers will aim to support partner organisations to improve their safeguarding standards and run transparent and appropriate investigations. We encourage all partners to create safe environments for beneficiaries and representatives alike.
 - If criminal behaviour is suspected, this will be reported to local law enforcement following completion of a risk assessment and with the permission of the survivor(s).
5. When will a case be closed?
1. A case will be closed when all action agreed by the safeguarding focal group is complete. In some cases this may include a formal investigation and subsequent action plan.
 2. Once a case is closed, the person who raised the concern will be made aware of the outcome and invited to provide feedback, which will form part of our lessons learnt activity.
 3. A concern can be re-opened at any time.

Annex 3: Code of Conduct

To be applied within and out of working hours⁸

I, (insert name), acknowledge that I have read and understand Sightsavers' Safeguarding Policy.

By signing this document, I agree:

- To comply with Sightsavers' Safeguarding Policy and this Code.
- To report any concerns or incidents in line with procedures set out in the policy.
- To raise awareness of the policy and Code of Conduct in my work environment.
- To promote Sightsavers' safeguarding standards and values

I will:

- Be committed to playing my part in creating a culture of openness and mutual accountability in the workplace. This culture will enable all safeguarding concerns to be both raised and discussed. This will in turn ensure inappropriate and abusive behaviour is challenged.
- Help create and/or uphold an environment that is safe, positive, and encouraging, where children and adults are listened to and respected as individuals.
- Ensure the use of the 'Two Adult Rule'. This means, when interacting with at-risk adults and/or children in a work context, I will ensure that another adult is present or within reach at all times.
- Ensure physical contact is at all times appropriate and not an invasion of the individual's privacy.
- Ensure communication in person and via digital platforms is appropriate at all times and complies with the Safeguarding Policy.
- Use positive, non-violent methods to manage behaviour.
- Respect an individual's dignity and their need to be safeguarded at all times when taking photographs, filming, or writing reports for public relations work.
- Ensure that when photographing, filming, or interviewing children and adults, the guidelines within the safeguarding and ethical content policies are followed and that consent has been obtained, individuals are properly dressed and are not depicted in a way that is abusive, sexually provocative, demeaning or culturally inappropriate or that characterises them as being entirely reliant on the viewer⁹.

⁸ For consultants and volunteers, this only applies while undertaking Sightsavers business, but this includes out of working hours while on Sightsavers business.

⁹ Consent Form is in Annex 5 of the Safeguarding Policy

- Maintain confidentiality when handling personal data of others, to minimise the risks posed by third parties who receive information about children and adults from Sightsavers or its partner organisations. This means no information shared by Sightsavers should contain the image, full name and specific location of any individual.
- Respond to safeguarding concerns according to the reporting protocol¹⁰.
- Comply with any investigation led by official bodies (including interviews) and make available any information necessary.

I will never:

- Harm, abuse, exploit or neglect any individual whilst representing Sightsavers.
- Engage in sexual activity or have a sexual relationship with a child, regardless of consent or local custom. Mistaken belief in the age of a child is not a defence.
- Condone or in any way force an at-risk adult, or a child, to participate in any form of sexual activity, real or simulated, on the internet or in any other medium.
- Make sexually suggestive comments or send inappropriate messages; inappropriately touch or sexually harass any children or adults.
- Touch, hold, kiss or cuddle an at-risk adult or a child, in an inappropriate and/ or culturally insensitive way.
- Marry a person below the age of 18, regardless of consent or local custom.
- Help at-risk adults or children with acts of an intimate or private nature, which they can do for themselves. Such actions may only be undertaken for an individual who has acknowledged the need for that assistance directly or through a parent/guardian.
- Engage in activities involving close body contact with at-risk adults and/or children, beyond professional requirements
- Hit or otherwise physically assault, or physically abuse an adult or a child. Use any form of corporal punishment as a disciplinary measure.
- Condone, or participate in behaviour with any adults or children that is illegal, unsafe or abusive, including being part of harmful traditional practices, spiritual, ritualistic or substance abuse.
- Act in ways intended to shame, humiliate, belittle or degrade others, or otherwise perpetrate any form of emotional abuse.
- Exploit adults or children for their labour (e.g., domestic servitude, street begging) or for sexual purposes, or participate in the trafficking of children. The definition of child domestic servitude does not include occasional house help, babysitting, kitchen gardening during school holidays or general domestic tasks out of school time.

¹⁰ Reporting form for safeguarding concerns is in Annex 4 of the Safeguarding Policy

- Develop relationships with children or adults that could be deemed exploitative or abusive.
- Spend excessive time alone with an at-risk adult or a child, away from others, behind closed doors or in a secluded area (in line with the 'Two Adult Rule')
- Take an at-risk adult or a child, who has been involved in our programmes, to my home, or visit them in their home where I may be alone with them.
- Sleep in the same bed or the same room as an at-risk adult or a child met through work or allow them to stay overnight at my home.
- Take an at-risk adult or a child, met through work alone in a vehicle unless it is absolutely necessary, and only with parental/guardian and managerial consent.
- Favour certain at-risk adults and/or children to the exclusion of others, as I recognise that this can further ostracise individuals from their peers.
- Engage in the procurement of commercial sex acts, regardless of local law and custom.

Location and date: _____

Signature: _____

Annex 4: Incident reporting form

Safeguarding incident reporting form, to be completed by Sightsavers staff or partner staff

Send to Sightsavers Safeguarding Mailbox titled “URGENT AND CONFIDENTIAL” or submit a concern via our Speak Up system.

- Report a concern to the safeguarding mailbox, managed by select global staff with safeguarding responsibilities, safeguarding@sightsavers.org
- Via our Speak up reporting tool: <https://www.sightsavers.org/how-were-run/accountability-and-transparency/speakup/> (concerns raised here can be done so anonymously and toll free phone lines are available)

This form is for reporting safeguarding concerns, including potential violations of Sightsavers’ Safeguarding Policy and/or Code of Conduct. The information in this form is confidential. Please provide as much information as possible. **Areas where you have nothing to report should be left blank.**

1. Contact Details

Your name	
Position at Sightsavers (Or relationship to Sightsavers)	
Date	
Email or Phone Number	
Country	
Sightsavers project name/number	

2. 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 OR Concerns about general behaviour, practices or infrastructure, that could be putting people at risk	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 of abuse, visible injuries, survivor confided in someone)	

Concerns that specific children or adults may have been harmed or are at risk of harm if no action is taken OR Concerns about general behaviour, practices or infrastructure, that could be putting people at risk	Tick if relevant
You are concerned about someone’s behaviour towards an adult or child (e.g. signs of aggression, obsession, or unhealthy interests 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 in the adult or child)	
Concern about someone’s general behaviour (e.g. breaking a condition of the Code of Conduct)	
Concern about the infrastructure, protocols or practices of a school, hospital, clinic or other organisation that could be putting people at risk (e.g. unclean/unsafe facilities, use of corporal punishment, lack of fire exits)	
How did this concern come to your attention? (I observed it in person/ someone else reported it to me/ the survivor told you directly)	

3. Information about your concern

Nature of concern/suspicion/incident
<p>Describe your concerns, what you have witnessed or what has been reported to you. Give as many details as possible; take as much space as needed.</p> <p>When did the incident or concern take place?</p> <ul style="list-style-type: none"> • Is anyone at risk of further harm? • Does the concern relate to children? • Does the concern relate to anyone with a disability?

4. Observations and actions

Conversation report

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.

- Who is aware of the concern?
- What conversation have you had with the survivor? (if any)
- What conversation have you had with the person of concern or their employer (if any)
- What are the wishes of the survivor or the person who reported this concern?

Observations

Such as injuries, emotional state of the child or adult affected, or the physical state of facilities.

Cultural factors

Please mention any specific cultural factors that need to be taken into consideration.

Action taken

Have any measures been taken, for example to improve the safety of facilities, and/or to protect any affected individuals? If so, please describe.

Next steps

Do you feel that any other measures – in addition to those already undertaken – are necessary, to ensure people’s immediate safety? If so, please give details.

Date: _____

Signature: _____

Annex 5: Permission for collection and use of content

Translate and/or read this statement

Sightsavers uses stories of people affected by sight loss, disease and/or disability to show why our support is needed. To do this, we request your permission to take photos and/or videos, interview you and record your voice. If you give your permission, your content may be used:

- in external communications (including TV, fundraising, websites, social media, newspapers and magazines, radio, posters, exhibitions)
- by Sightsavers, our partners, donors and supporters
- internationally and in your country
- to show the challenges you have faced, or how you have benefited from our support

If you give your permission, we will store your content securely for up to five years, after which it will be archived with restricted access. Occasionally it may be used for longer than five years.

You have the right to refuse. This will have no impact on support you may receive from us.

Participant details

1. Name of participant: _____

2. Age _____ (children age 7-18 must sign in addition to their parent/guardian):

3. Location: _____

4. If signing on behalf of a group/institution, your position: _____

5. If signing on behalf of a child under 18, or someone who cannot sign for themselves:

Name of parent/guardian: _____

Relationship with participant: _____

6. Do agree for your full, real name to be used? (if no, please give details): **Yes** **No**

7. Any other notes or special instructions:

Participant declaration

I sign to say I understand the information above and give my consent for my photo, video, story and voice to be collected and used as described.

Participant (aged 7 or older): _____

Parent/guardian: _____

Date: _____

To help us match permission to photos, please write a description of the participant (eg describe clothing or other distinguishing features):

Annex 6: Safer Recruitment statement

Sightsavers is committed to minimising the risk of harm to children and vulnerable adults from staff, operations and programme activities. We will carefully select, train and support all staff in line with our Safer Recruitment principles.

This means we will:

- Ensure that our recruitment and selection processes are inclusive, fair, consistent and transparent;
- Take all reasonable steps to prevent those who might harm children or adults from working for us;
- Adhere to safer recruitment guidance and standards, responding positively to changing understandings of safer recruitment practice; and
- Always seek advice from the HR Operations Team to achieve best possible practice in relation to recruitment.

What is Safer Recruitment?

Safer recruitment means giving consideration to safeguarding issues at every stage of the recruitment process. It is known that people who seek to harm others by using their professional or volunteer status will look for an organisation or project with weak recruitment practices, where they can have access to vulnerable adults or children.

Sightsavers' safer recruitment guidelines means that potential employees must:

- Complete the specified application process for the role to which they have applied, indicating whether they know anyone who works for Sightsavers and if so their relationship to that person or persons;
- Where determined by HR, complete a self-disclosure form to disclose previous spent/unspent convictions and disciplinary or capability issues;
- Undertake an interview to assess suitability and capability to carry out the role. Please note that interview panels consist of a minimum of two people with no prior connection to the interviewees. Interview records are retained for six months following the date of the interview and may be held longer for successful candidates that become employees;
- If offered a role, provide references covering the previous three year period, accounting for any gaps in employment; and
- If offered employment, provide identity documents including photographic identity and evidence of their right to work in the respective country.

Garda vetting

According to the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016, the vast majority of roles at Sightsavers are ineligible for Garda vetting. Access to or contact with vulnerable adults and children is not a necessary or regular part of any of our staff members' direct responsibilities. Our programmes are developed and delivered with

partner organisations, and it is our partners who provide services, and work directly with beneficiaries. Our programmes team work with partners to ensure they have good safeguarding policies and procedures in place, and where appropriate the Compliance Team will encourage criminal records checks be carried out by partners for eligible staff and volunteers. On the rare occasion that a role at Sightsavers would qualify for Garda Vetting, this will be undertaken as part of the recruitment process, as agreed with the relevant HR Operations recruiter.

How do we reduce the risk of adults or children being harmed by Sightsavers staff?

We believe that the best safeguard is a high standard of management practice and quality control consistently applied to employees at recruitment and selection and subsequently through induction, performance management and review, support and supervision and monitoring.

We do this through:

- Ensuring all potential applicants are aware of our safeguarding commitments via the job advert pages on our website;
- A clear recruitment and selection process which ensure employment checks and references are completed before an individual starts work and gaps in employment are questioned;
- Providing training and guidance to recruiting managers on all aspects of recruitment and safeguarding training to senior members of staff and Designated Safeguarding Leads (see Safeguarding Policy for more details)
- Our safeguarding policy which makes it clear that child abuse is unacceptable and will result in disciplinary measures and notification of relevant law enforcement agencies;
- Our Safeguarding Code of Conduct which clearly identifies acceptable and unacceptable behaviour;
- A 'two adult rule' which means that no member of staff should ever be alone with a vulnerable adult or a child;
- Ensuring all staff read the Safeguarding Policy and sign the Safeguarding Code of Conduct as part of their induction;
- Reviewing staff performance throughout their employment with the organisation including probation reviews in countries that operate a probation rule;
- Providing clear, accurate references for leavers reflecting conduct where appropriate;
- Having clear reporting and incident management procedures for safeguarding concerns, including concerns about staff members' behaviour as detailed in the Safeguarding Policy; and
- Publicising our Whistleblowing policy which protects employees, officers, consultants, contractors, volunteers, casual workers and agency staff who raise a concern, and allows concerns to be reported in confidence.

If you have a safeguarding concern

If you are concerned about the safety or wellbeing of an adult or child, or if you are concerned about a colleague's behaviour, contact safeguarding@sightsavers.org, all staff can also raise concerns about staff wellbeing and conduct via their Senior HR Business Partners.

Annex 7: Responding to disclosures of harm or abuse – for representatives

Please use the following guidance when responding to any disclosures of harm and/or abuse.

- **Listen carefully.** Don't interrupt the individual to seek help. Try to avoid distractions such as mobile phones. Avoid expressing your own views on the matter. Distractions and/or a reaction of shock or disbelief could cause the person to stop talking.
- **Let them know they've done the right thing.** Reassurance can make a big impact to the individual who may have been keeping the abuse secret.
- **Tell them it's not their fault.** Abuse is never the individual's fault and they need to know this.
- **Say you will take them seriously.** An individual could keep abuse a secret in fear they won't be believed. They've told you because they want help and trust you'll be the person who will listen to and support them.
- **Record what the individual tells you in their own words,** do not interpret what they have said. Do not push them for more information or ask leading questions.
- **Don't talk to the alleged abuser.** Confronting the alleged abuser about what the individual's told you could make the situation a lot worse for the individual.
- **Explain what you'll do next.** If age appropriate, explain to the individual that you'll need to report the abuse to someone (your Designated Safeguarding Lead or the Global Head of Safeguarding) who will try to help.
- **Don't delay reporting the abuse.** The sooner the abuse is reported after the individual discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly. The physical safety of the individual is paramount, so the DSL or Global Head of Safeguarding will ask if you think the individual is at immediate risk or harm and/or abuse and act accordingly.

Annex 8: Sightsavers Ireland Safeguarding Implementation Plan

Implementation plan last reviewed	January 2021
National Designated Safeguarding Lead	Cathal O'Grady
National safeguarding reference group	Cathal O'Grady and Feargal O'Connell
Sightsavers Global Head of Safeguarding	Anya Ward

The Sightsavers Ireland Safeguarding Policy is only applicable to concerns about the safety or wellbeing of those who come into contact with Sightsavers staff or programmes.

1. All Sightsavers Ireland representatives, including staff, consultants and trustees must comply with the Sightsavers Ireland Safeguarding Policy and attached Code of Conduct.
2. Prior to any activity or event organised by Sightsavers Ireland which may involve contact with children or vulnerable adults taking place, a Safeguarding Risk Assessment and Plan should be conducted by the organiser in conjunction with the DSL.
3. All safeguarding concerns that arise either within or outside Ireland will be handled in accordance with the incident management procedures outlined in Sightsavers' Safeguarding Policy.
4. Any representative of Sightsavers Ireland who has a safeguarding concern must report it immediately to the Designated Safeguarding Lead (DSL) or Sightsavers Ireland CEO. If the representative is unable to contact the DSL or CEO, the Global Head of Safeguarding (GHoS) must be informed immediately via safeguarding@sightsavers.org. Safeguarding incidents must be treated confidentially, so other staff members should not be informed before an action plan is agreed with the global safeguarding team.
5. Anyone who is not a representative of Sightsavers Ireland and has a safeguarding concern about an individual(s) in Ireland may report it to the DSL by emailing safeguarding@sightsavers.ie.
6. From the point when the DSL is aware of the incident, the DSL will submit a written report to the GHoS within 24 hours or, if this is not possible, call or email a summary report within this period with a written report to follow as soon as possible.
7. As part of Sightsavers' response to a safeguarding incident in Ireland, it will report the incident as appropriate and necessary to the relevant agencies or bodies including the Health Service Executive (HSE), the Child and Family Agency (Tusla), An Garda Síochána and/or donors such as Irish Aid. All serious incidents will be reviewed by the global safeguarding team and reported to other appropriate bodies, where applicable.

All safeguarding concerns must be reported to the Designated Safeguarding Lead (safeguarding@sightsavers.ie) or GHoS (safeguarding@sightsavers.org) using the email subject 'URGENT: Attention, please treat this email confidentially'.



www.sightsavers.ie

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