POLICY FOR SAFEGUARDING VULNERABLE GROUPS

CO-CEOs Foreword

Vision Action is committed to upholding the highest standards of safeguarding and ethical conduct in all our work. We recognise that many of the communities we serve include individuals at increased risk of harm, including children, vulnerable adults and others whose circumstances may place them at risk.

Safeguarding is central to our work. All staff and those acting on our behalf are expected to promote the safety, dignity and wellbeing of vulnerable groups at all times, and to act promptly on any concerns. We have a zero-tolerance approach to abuse, exploitation or misconduct in any form.
This policy applies to all representatives of Vision Action and our partners, both in the UK and internationally. Any breach of this policy will be treated seriously and may result in disciplinary action, termination of contracts, or referral to relevant authorities.

Tiwonge Mwase-Vuma
Co-CEO

Jale Canlibalik
Co-CEO

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POLICY FOR SAFEGUARDING VULNERABLE GROUPS

Vision Action is committed to the highest standards of safeguarding, protection, and integrity in all our activities. This policy sets out our responsibilities to safeguard **children**, **adults at risk**, and **other individuals who may be vulnerable due to their identity, disability, age, social circumstances, environment, or power imbalances**.

1. SCOPE

This policy applies to all individuals working with or representing Vision Action, including employees, trustees, volunteers, consultants, contractors, partners, and others acting on its behalf. It covers all activities in the UK and internationally.
All partners are expected to meet Vision Action's safeguarding standards. Breaches of this policy may result in disciplinary action, termination of contracts, or referral to relevant authorities.

Multi-Agency and Partnership Working
Vision Action works in partnership with local organisations, governments, community groups and international agencies. We recognise that effective safeguarding requires coordinated, multi-agency approaches, including appropriate information sharing and timely responses to protect children and vulnerable adults.

We operate within national safeguarding frameworks in each country, following local laws, reporting procedures and referral pathways. Where systems differ, Vision Action applies UK safeguarding standards as a minimum benchmark, while respecting local context. We engage with relevant safeguarding authorities, social services, law enforcement and health providers to ensure concerns are managed safely, promptly and appropriately.

We also ensure that safeguarding reporting mechanisms are accessible to communities, including routes to report concerns directly to Vision Action where needed.

Partner due diligence includes (but is not limited to):

- Risk-based partner assessments
- Safeguarding clauses within contracts
- Ongoing monitoring of safeguarding practices
- Exchange and review of relevant policies (e.g. safeguarding, code of conduct, anti-harassment, whistleblowing)
- Clear mandatory reporting requirements for partners

2. PURPOSE

This policy ensures that:

- The protection and wellbeing of vulnerable groups is prioritised in all Vision Action activities.
- All representatives understand their responsibility to prevent, identify, respond to and report safeguarding concerns.
- A culture of accountability and continual safeguarding improvement is maintained.

Core principles: Confidentiality, Sensitivity, Ownership, Consultation, Transparency, Equality and diversity.

Safeguarding risk assessments are conducted for all programmes, with identified risks documented and appropriate mitigation measures implemented.

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3. SAFER RECRUITMENT

Safeguarding is fully embedded within Vision Action's recruitment practices.
Requirements:

- All job adverts and volunteer role descriptions reference Vision Action's safeguarding policy.
- Interviews will include safeguarding questions.
- All staff, volunteers, consultants, and trustees must sign the safeguarding commitment before starting work.
- Employment history must be scrutinised and any unexplained gaps explored.
- Two independent references are required for all new recruitment, including recruitment of volunteers.
- Vision Action may contact previous employers not listed as referees if verification is required.
- Self-declaration of offences will be requested upon appointment
- DBS checks (or equivalent overseas police checks) are required for roles involving contact with vulnerable groups as appropriate to their role and in line with Vision Action's policy on Recruitment of Ex-offenders.

4. EDUCATION AND TRAINING

Vision Action promotes a learning culture around safeguarding. Where possible, staff should participate in multi-agency safeguarding training alongside local authorities, partners and other organisations.

Training Requirements:

All staff, trustees, volunteers and consultants:

- Receive the safeguarding policy and sign to confirm understanding.
- Receive induction on safeguarding upon joining.
- Receive our Code of Conduct to read and sign

Country Directors, programme staff, drivers, finance staff and other staff who visit clinics, schools or hospitals as part of their role:

- Must complete annual online safeguarding training.
- Must sign our Code of Conduct annually

Volunteers and consultants:

- Must complete safeguarding training annually or prior to their assignment.
- Must sign our Code of Conduct annually or prior to their assignment

Individuals who visit clinics, schools or hospitals occasionally:

- Must receive a safeguarding briefing from the Country Director or complete online training.
- Must sign our Code of Conduct prior to their visit

Safeguarding Leads:
Global Designated Safeguarding Lead and Deputy will undertake annual training for the role.

Monitoring

- Training is reviewed during annual staff appraisals in order to pass their appraisal.
- Anyone without up-to-date training (within 12 months) cannot visit vulnerable groups or clinical/school environments.
- Partners receive a copy of the Safeguarding Policy.

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- The Global Programmes Manager reviews safeguarding training effectiveness bi-annually.

Board of Trustees:

- Have overall responsibility for safeguarding adherence
- Will be regularly briefed by the Grants and Organisation Compliance Lead on safeguarding training and risks (incidents reported to the board as part of the investigation process)
- Will conduct an annual safeguarding review
- Will receive annual safeguarding training to carry out their responsibilities.

5. BEHAVIOUR PROTOCOLS

The Vision Action Code of Conduct outlines expected behaviour. UK safeguarding standards are the baseline across all countries.

All staff, volunteers, trustees and consultants MUST:

- Treat vulnerable groups with respect and dignity.
- Prioritise their physical and emotional safety.
- Maintain professional boundaries.
- Explain any physical contact required during eye examinations.
- Avoid being alone with vulnerable individuals; ensure a chaperone is always present.
- Keep doors open to maintain visibility and monitoring.
- Listen carefully to disclosures.
- Report concerns immediately.
- Liaise openly with parents, guardians or relevant adults, whilst not excluding the child or vulnerable adult
- Concerns involving sexual exploitation or abuse may be reported externally at any time

Child Safeguarding – Never:

- Hit, physically assault or abuse a child
- Develop sexual or exploitative relationships
- Engage in child labour, trafficking or exploitative work
- Act in sexually provocative, humiliating or discriminatory ways
- Sleep in the same room as a child
- Allow a child to stay unsupervised in private accommodation
- Do things for a child they can do themselves
- Engage in any illegal or unsafe behaviour

Adult Safeguarding – Never:

- Sexually abuse, exploit or groom an adult at risk
- Subject an adult to emotional, psychological, financial or physical abuse, including neglect
- Engage in power-abusive behaviour

PSEA – Never:

- Exchange money, employment, goods or services for sexual acts
- Engage in sexual relationships with beneficiaries (power imbalance makes consent impossible)

Promoting Safe Practice

Staff must ensure:

- Work is planned to minimise safeguarding risks
- A culture of openness is maintained
- Accountability between colleagues
- Children and adults are empowered to raise concerns

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- Images, videos or stories involving vulnerable groups may only be collected or shared following a signed informed consent form, including a safeguarding risk assessment, and must avoid identification risks.
- Digital storage of safeguarding data must follow UK GDPR and Vision Action data protection procedures.
- Any concerning online behaviour (grooming, coercion, bullying, exploitation, trafficking or inappropriate contact) must be reported immediately via safeguarding channels.

6. ONLINE AND DIGITAL SAFEGUARDING

Vision Action complies with the Online Safety Act 2023 and recognises that safeguarding applies across digital environments even when we do not deliver online services directly to children. Vision Action will cooperate with local and international cybercrime, child protection, and online safety agencies where digital harm is suspected.

Digital Conduct – Staff MUST NOT:

- Use personal phones to take photos
- Communicate privately with children through mobile, messaging apps, or social media
- "Friend", follow, or otherwise connect privately with children or vulnerable adults online
- Post images or stories of beneficiaries on personal social media

Images, Stories and Consent

- All images or stories require **informed consent** including safeguarding risk assessment
- Consent is valid for **5 years** unless withdrawn sooner
- Images must never identify a child's exact location, school, village or any detail increasing risk
- Photos must be respectful and non-exploitative
- Image manipulation is not permitted

Use of Messaging Platforms

- WhatsApp or similar tools must be used **only in approved group settings**, never for private communication with vulnerable individuals

Concerning Online Behaviour

Staff must report immediately any:

- online grooming
- bullying or harassment
- sexual exploitation attempts
- inappropriate contact
- harmful content affecting vulnerable groups

7. COMMUNICATIONS ABOUT VULNERABLE GROUPS

All communications must protect the dignity, privacy and safety of vulnerable groups.

Requirements

- Obtain informed consent (including safeguarding risk assessment) before capturing or using images or stories
- Do not share identifiable personal information publicly
- Ensure images and stories are respectful, accurate and non-exploitative
- Avoid including details that may increase risk (e.g. location, school, identifiable features)
- Staff and partners must be trained in ethical storytelling
- Journalists and third parties must be briefed on safeguarding requirements before access

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Data Protection and Consent

- Images and personal data relating to children and vulnerable adults must be treated as sensitive personal data
- This means they require explicit, informed consent and careful handling to ensure confidentiality and safety
- Personal data must only be collected, shared and stored where necessary, and in line with Vision Action data protection procedures

Communications Channels

All Vision Action communications, including social media and publications, must follow this policy

8. REPORTING AND REACTION

Everyone must report safeguarding concerns immediately. This is also known as speaking up.
If you think a child or adult may be at risk of harm, you must report it **straight away**. Not reporting a concern may lead to disciplinary action and could also be a legal offence under UK safeguarding law. Where a concern relates to a child, Vision Action will make an immediate referral to the local authority children's social care team (UK or overseas).

Emergency situations

If someone is in immediate danger, contact local emergency services first. Then follow the reporting procedure below.

How to report a concern (speak up)

You can report a concern to any of the following:

- Country Director
- Global Programmes Manager
- Either Co-CEO
- Global Designated Safeguarding Lead / DSL: **Ahalya Subramanian**
- Staff member with safeguarding responsibilities/Deputy Global DSL: **Tiwonge Mwase-Vuma**

Reports can be made:

- verbally
- in writing
- anonymously (where reasonable and possible)

If the allegation involves a senior leader

- Country Director → report to Global Programmes Manager
- Global Programmes Manager → report to Co-CEOs
- Co-CEOs → report to the Chair of the Board
- Partners → follow the same escalation route

Individuals, vulnerable persons or family members, who are not employed by, or working on behalf of (volunteer, consultant) or in partner with Vision Action can raise a concern directly to the Global Safeguarding Leads or Co-CEO Jale Canlibalik (see section: Community Safeguarding and Reporting, below)

Safeguarding Leads

Global Designated Safeguarding Lead / DSL – Ahalya Subramanian safeguarding@visionaction.org.uk
Global Deputy DSL(s) – Tiwonge Mwase-Vuma Tiwonge.Mwase-Vuma@visionaction.org.uk;
Country-level safeguarding leads - Country Directors
Alternative contact: Jale Canlibalik (Co-CEO) jale.canlibalik@visionaction.org.uk
Supported by:
Policy & Compliance – Judith Trigg Judith.trigg@visionaction.org.uk;

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If in doubt of where to send your concern use safeguarding@visionaction.org.uk

Whistleblowing
If you feel you cannot report internally — for example, if the concern involves a senior leader — you may use the **Vision Action Whistleblowing Policy**.

External links that you could use if internal routes are not satisfactory.
Protect – speak up, stop harm Independent whistleblowing advice
Charity commission raise a concern about a charity

Recording the concern
Whoever receives the initial report/concern must:

1. Alert the DSL and deputy DSL immediately, then;
2. Record the information using the Safeguarding Incident Report Form (Annex B)
3. Send it within 24 hours to:
    - safeguarding@visionaction.org.uk - monitored by Ahalya Subramanian, (Designated Safeguarding Officer/Trustee), Tiwonge Mwase-Vuma (Safeguarding staff lead) and Judith Trigg (Grants & Organisational Compliance Lead)
    - An alternative email (if a concern is about one of the above) Jale.Canlibalik@visionaction.org.uk
4. Inform the person reporting the concern that relevant action has been taken and will be investigated in line with this policy

Community Safeguarding and Reporting
Vision Action does not typically interact directly with beneficiaries, as services are delivered through local partners and government health providers. However, Vision Action recognises its responsibility to ensure that all individuals impacted by its work can safely raise safeguarding concerns.
To support this:

- All individuals contributing to images, case studies or storytelling will receive an informed consent form that includes:
    - Vision Action's country safeguarding lead contact details (telephone)
    - Vision Action's global safeguarding email address
- Vision Action requires all partners to maintain accessible, safe, and confidential reporting mechanisms for communities
- Vision Action expects partners to assist fully and openly with any safeguarding investigation received by us, concerning a partner organisation
- Individuals may report concerns directly to Vision Action at any time, without going through local partners

Vision Action will take all concerns seriously and act in line with this policy, regardless of how they are received.

9. RESPONDING AND INVESTIGATING

Vision Action will carry out all safeguarding responses in a prompt, fair, confidential and trauma-informed manner. Responses will follow a multi-agency approach and align with relevant statutory guidance, including Section 47 of the Children Act 1989 and Working Together to Safeguard Children (2023 and subsequent updates).
Section 47 duties apply to safeguarding concerns involving children in the UK; for international programmes, equivalent local child protection laws and procedures will be followed.

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Initial Response (within 1 working day)
When a concern is received:

1. Confirm to the person raising the concern that it has been received
2. Carry out an initial risk assessment
3. Apply a balancing test (unless urgent action is needed)
4. Take any immediate protective action required to keep someone safe

A balancing test helps decide whether information should be shared, following UK GDPR and the Data Protection Act 2018.

Investigation Process

- A Case Manager will oversee the process
- An independent, trained Investigator will carry out the investigation
- A separate Decision Maker will determine the outcome
- The deputy DSL will inform the Charity Commission of serious safeguarding incidents
- Investigations should normally be completed within 30 working days, unless the case is complex (in which case the Case Manager must keep all relevant parties informed)
- The Designated Safeguarding Lead (DSL) is responsible for ensuring clear and appropriate communication with the individual raising the concern and other relevant parties, while maintaining confidentiality in line with safeguarding requirements.

Possible Outcomes
Actions may include:

- Disciplinary action (including dismissal)
- Suspension or removal from a project
- Withdrawal from a partner organisation
- Ending a contract
- Referral to statutory authorities

Outcomes will normally be issued within 5 working days of the investigation closing.
The overarching outcome is that children and vulnerable adults are safe from harm

Confidentiality and Information Sharing
Safeguarding information is only shared with people who need to know, based on:

The Balancing Test
We ask:

- Is the person at risk of serious harm?
- Will sharing information help keep them safe?
- Is the risk of *not* sharing greater than the impact on their privacy?
- Do we need to share all the information, or just part of it?

If the risk of harm is higher than the need for privacy, we will share information under legitimate interests (UK GDPR / Data Protection Act 2018).
Information shared will always be proportionate, relevant, and limited.

Recognised Legitimate Interests (RLI)
In urgent situations where delay could increase the risk of harm, we may share personal data under Recognised Legitimate Interests, without completing a written balancing test first. This is consistent with UK GDPR's allowance for vital interests and safeguarding interests.
Use RLI when:

- Someone needs immediate protection
- There is not enough time to complete a formal balancing test

All decisions must still be necessary, justified, and properly recorded.

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10. RAMIFICATIONS OF MISCONDUCT

If allegations are substantiated:

- Staff may face dismissal or repatriation
- Volunteers/trustees may be removed from their role
- Partners may lose funding/engagement
- Criminal prosecution may follow

Victims and survivors will be supported and signposted to appropriate services.

11. RETENTION OF RECORDS

Vision Action will follow UK GDPR and Safeguarding key principles on the retention of safeguarding records, which can be up to 75 years. We will work with local authorities and other agencies and only retain if we are required to.

ICO 10-step guide to sharing information to safeguard children
NSPCC Child Protection record retention and storage guidelines
Working together to Safeguard Children 2026 Update summary

12. SUPPORTING POLICIES & GUIDANCE

Vision Action works in line with:

- UK safeguarding guidance for clinical professions
- Relevant local country safeguarding policies
- Ethical guidelines for healthcare, schools, and community organisations
- Staff working directly with safeguarding concerns will receive regular safeguarding training

Cross-reference policies:

- Harassment & Misconduct Policy
- Whistleblowing Policy
- Data Protection Policy
- Code of Conduct
- Recruitment of Ex-Offenders

Safeguarding Monitoring and Key Performance Indicators (KPIs)

Vision Action monitors safeguarding implementation and effectiveness through regular review and key performance indicators.

The following KPIs will be monitored and reported as part of organisational safeguarding assurance:

- % of staff, trustees, volunteers and relevant partners complete mandatory safeguarding training
- Number of safeguarding concerns reported (by type and severity)
- % of safeguarding concerns reported within required timeframe
- Time taken to complete safeguarding investigations
- Number of partner safeguarding assessments completed
- Number of incidents meeting Charity Commission serious incident reporting thresholds

Safeguarding data will be reviewed regularly by senior management and reported to the Board of Trustees. This supports organisational learning, risk management, and continuous improvement.

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ANNEX A: POLICY COMPLIANCE

I have received and been briefed on the Vision Action Policy for Safeguarding and fully understand my responsibilities to comply with and promote the Policy.

Signed	
Name	
Position within Vision Action	
Date	

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ANNEX B: SAFEGUARDING INCIDENT REPORT FORM

Date/time **completing** and **sending** form	
Name of staff member who **received** the concern AND completing form	
Name of person **raising** the concern (incl contact details if not staff)	
Date/time the concern/incident was **first reported**	
How was the original concern received? (i.e. email, verbal, phone)	
Name(s) of alleged victim(s) of safeguarding incident(s)	
Name(s) of alleged perpetrator(s) of safeguarding incident(s), include Partner details if applicable.	
Description of incident(s) Please include dates(s), times(s) and location(s) of incident(s) (if known) Include any emergency action (incl date and time) to make victim safe	
Name of person(s) and email address(es) you are sending this form to.	

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ANNEX C: GUIDANCE FOR MAKING A SAFEGUARDING DISCLOSURE
(Easy-to-follow step-by-step instructions)

1. If you see, hear or suspect something — ACT IMMEDIATELY
A safeguarding concern can arise from:

- Something you see or witness
- Something you are told
- A rumour, informal conversation or "off-hand" comment
- A message, email, text, or social media post
- A behaviour change that makes you uneasy

You do not need evidence. If something feels wrong — report it.

2. Who to Report To (Decision Tree)
A. General safeguarding, malpractice or misconduct concerns

- Concern about a staff member, consultant or volunteer? → Report to the Country Director.
- Concern about the Country Director? → Report to either Co-CEO.
- Concern about a Co-CEO? → Report to the Chair of the Board.

Where there is a conflict of interest at any stage, the next level of management will appoint an appropriate internal or external investigator.

B. You may bypass management at any time
Individuals may bypass the reporting routes set out above if they:

- feel uncomfortable reporting through normal management channels;
- believe there may be a conflict of interest; or
- are concerned that the matter will not be handled impartially.

In such circumstances, concerns may be reported directly to:

- the Chair of the Board; or
- either Co-CEO.

The recipient of the report will determine the most appropriate next steps. The matter may be referred to another manager for investigation only where this can be done without any actual or perceived conflict of interest.

C. If there is an immediate risk to someone's safety
If the concern involves:

- A child
- An adult at risk
- A vulnerable individual
- A medical or clinical emergency
- Any situation posing immediate danger

➞ Report straight away to the Country Director.
➞ Immediate protective action must be taken.
➞ Follow-up will be escalated using the procedures in this guidance.

D. If none of the above routes feel safe
You can contact Vision Action's independent safeguarding point of contact:

- Ahalya Subramanian – Safeguarding Focal Point of the Board & DSL
  safeguarding@visionaction.org.uk

Who can advise on:

- Your rights
- External reporting routes
- Whistleblowing protections

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- What to do next

You may also consult the Vision Action Whistle-Blowing Policy.

3. How to Make a Disclosure

You may report verbally or in writing via:

- Email
- Text or messaging app
- Letter or written note
- Phone call
- Social media message
- Anonymous route (where available)

If in doubt — report anyway.

4. What To Do When Someone Discloses to You

If someone shares a concern with you:

1. Stay calm and listen.
2. Do not investigate or ask leading questions.
3. Do not promise confidentiality — explain you must report it.
4. Reassure the person they were right to speak up.
5. Write down what they said in their own words, as soon as possible.

5. Document the Concern

Use the Safeguarding Incident Report Form (Annex B) to record:

- Who was involved
- What happened
- When and where it happened
- How you found out
- Any risks remaining

Sign and date the form.

6. Forward the Report Within 24 Hours

You must send the completed form to:

- The Safeguarding Lead, or
- Your line manager

within 24 hours.

If the concern involves your line manager, bypass them and follow the relevant route above.

7. What Happens After You Report a Concern

7.1 Initial Clarification

Following an allegation of abuse or violation:

- The Country Director coordinates the initial clarification.
- Immediate safety actions may be taken before any formal investigation begins.

7.2 Suspension or Removal from the Project

If the alleged perpetrator is a Vision Action:

- Employee
- Trustee
- Volunteer

…they may be suspended on contractual pay during the investigation.

- Only the Co-CEOs can authorise suspension or removal.
- This decision cannot be appealed.
- Suspension may include:
    - Asking the person to remain in their hotel or at home
    - Removing them from project sites

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- Restricting access to beneficiaries, staff or data

Suspension is a neutral act — it protects the survivor and the integrity of the investigation. Staff will be suspended for full contractual pay while the investigation is ongoing.

7.3 Confidentiality

The investigation process is strictly confidential.

- Information is shared only with those directly involved.
- All parties must keep details private.
- All documents are securely stored.

7.4 Investigation Process

The investigation will:

- Be impartial and timely
- Follow Vision Action procedures
- Involve an assigned investigator
- Collect evidence and conduct interviews
- Consider safeguarding risks throughout

Outcome is normally provided within 30 days of the incident reaching the Safeguarding Lead.

7.5 Outcomes and Sanctions

If a safeguarding violation is proven, actions may include:

- Employees: disciplinary action or dismissal
  - International staff will be repatriated
  - Police reports will be filed
- Volunteers/trustees/interns: ending the relationship with Vision Action
- Partner organisations: withdrawal of funding/support and termination of partnership
- Consultants/contractors: termination of contract
- Anyone: referral for criminal prosecution

7.6 Communication and Media

- Media enquiries are handled only by the Communications Officer, under direction from the CEO.
- The CEO briefs the Board on reputational risk and action taken.

7.7 Support for Survivors

Victims and survivors will be supported by the Country Office, including:

- Access to medical care
- Psychosocial support
- Legal support (where available)
- Referrals to specialist agencies
- Respect for their wishes wherever possible
- Regular updates on case progress

8. Key Things to Remember

- Reporting concerns is a legal and professional duty.
- You are protected from retaliation when reporting in good faith.
- You do not need to investigate — only to report.
- No concern is too small.
- Safeguarding is everyone's responsibility.

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ANNEX D: LEGAL AND POLICY FRAMEWORK

Children & Young People

- Children Act 1989
- Children Act 2004
- Working Together to Safeguard Children (2023 and 2026 statutory updates)
- Keeping Children Safe in Education (2025)

Adults at Risk

- Care Act 2014 (adult safeguarding duties and "Making Safeguarding Personal" principles)
- Mental Capacity Act 2005 where applicable

Sexual Misconduct / PSEA

- Sexual Offences Act 2003 (as amended)
- United Nations PSEA Standards (ST/SGB/2003/13)
- Core Humanitarian Standard (CHS) Commitments 3 & 5

Equality, Conduct, Whistleblowing

- Equality Act 2010
- Worker Protection (Amendment of the Equality Act 2010) Act 2023 (duty to take reasonable steps to prevent sexual harassment, including by third parties)
- Public Interest Disclosure Act 1998 + 2026 whistleblowing updates
- Vision Action Whistleblowing Policy
- Modern Slavery Act 2015
- Safeguarding Vulnerable Groups Act 2006 (regulated activity/DBS/police checks)

Digital & Data

- Online Safety Act 2023
- UK GDPR & Data Protection Act 2018

International Compliance

Vision Action adheres to:

- Local safeguarding, health, education, and child protection laws
- Ministry of Health / Ministry of Education requirements in programme countries
- Ethical standards relevant to partner NGOs
- Counter-Terrorism & Security Act 2015 (where applicable)

Where conflicts occur, Vision Action applies **UK safeguarding standards as the baseline**.

Vision Action also complies with the UN PSEA standards (ST/SGB/2003/13), the Core Humanitarian Standard, and international safeguarding requirements relevant to countries where we operate.

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