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Application	The UK & Ghana operations of Savannah Education Trust (SET)

1. Policy Statement

Savannah Education Trust recognises that all children without exception have the right to protection from abuse, mental or physical abuse, negligent treatment, neglect, maltreatment or exploitation.

As a charity that provides, through the creation of schools in partnership with local partners (including government), an education to some of the poorest children in West Africa through the provision of schools, Savannah Education Trust is fully committed to safeguarding the welfare of all children with whom it comes into contact. This applies to Trustees & volunteers and associates in the UK, as well as the staff team, volunteers and associates in Ghana.

The children and young people with whom we come into contact often experience absolute and relative socio-economic poverty. Therefore, as a result, Savannah Education Trust recognises that the children with whom it comes into contact may be particularly vulnerable to abuse or exploitation.

The policy will be reviewed annually unless there is a specific need to review at an earlier interval to ensure that the policy remains up to date and in line with the relevant guidance and regulation. Key terms are defined in Appendix 1.

2. Policy Purpose

Savannah Education Trust is fully committed to safeguarding the welfare of children and young people, particularly those with whom it comes into contact. The schools which we create and run are government schools and teachers are employed by the Ghana Education Service (GES). The immediate responsibility for safeguarding within our schools therefore sits with GES. We work closely with the government officials and teaching staff who have overall responsibility for child protection issues.

This purpose of this policy is to ensure that:

- All who work for us or on our behalf in any capacity have the confidence, knowledge and support to meet their responsibilities in the safeguarding of children and young people
- We have procedures in place to deal with the actions and behaviour of our staff or any associate that result in harm to children or young people and/or places them at risk of the same

- Children and young people are aware of our responsibilities to prevent and respond to any harm against them arising from the actions and behaviours of staff members or any associate in any capacity, and the route/method of reporting such harm

3. Equality Statement

Savannah Education Trust believes that all children and young people have the same rights to protection. Savannah Education Trust is committed to non-discriminatory practice and recognises the additional needs of children from minority ethnic groups and disabled children, and the barriers they may face.

4. Contact with Children or Young People

Savannah Education Trust's main activity is the funding and building of schools in the Upper West region of Ghana. The charity also provides a feeding programme, teacher training and scholarships. The running of the schools (including safeguarding) and the employment of teachers is the responsibility of the Ghana Education Service (GES).

Whilst it is not part of the day to day activities of Savannah Education Trust to engage directly with children or young people, this will occur frequently in a supervised environment. For example, staff members in Ghana will regularly visit the schools to drop off resources, food and meet with teachers.

There may very occasionally be one to one unsupervised work with children in the form of interviews and meetings regarding scholarships or any other specific needs such as those related to a disability.

In the UK, there is likely to be only occasional supervised contact with children at charity talks and meetings.

Based on our philosophy of schools that are rooted in their local community we have not, up until this date, accepted volunteers from outside of Ghana to work in the schools. There are no UK staff working in Ghana and no plans for this situation to change. We require, however, that any visitors from outside of Ghana wanting to visit the schools undergo a DBS check (or equivalent) before being accepted.

5. Relevant Legislation

The principal pieces of international, UK and Ghanaian legislation governing this policy are:

International (and ratified by both the UK & Ghana)

- United Nations Convention on the Rights of the Child (UNCRC) 1989. This covers all aspects of a child's life and set out the civil, political, economic, and cultural rights that children everywhere are entitled to. It explains how adults and governments must work together to make sure all children can enjoy their rights.
- United Nations Convention on the Rights of Persons with Disabilities (CRPD) 2007 This stipulates that societies recognise that all people must be provided with the opportunities to live life to their fullest potential.

England & Wales

- Safeguarding Vulnerable Groups Act 2006 . This establishes a single body to make decisions about individuals who should be barred from working with children and to maintain a list of these contacts

- Children Act 1989. This provides the legislative framework for child protection in England.
- Children Act 2004. This strengthens the 1989 Act and encourages partnerships between agencies and creates more accountability
- Working Together to Safeguard Children 2015. Statutory guidance on inter-agency working to safeguard and promote the welfare of children for anyone working with children in England. This was produced by DfE and is an update on the 2013 version.
- The Care Act 2014 sets out responsibilities for protecting adults with care and support needs from abuse or neglect.
- Public Interest Disclosure Act 1998 protects whistleblowers from detrimental treatment from their employer.
- The Protection of Freedoms Act 2012. This act brought about the Disclosure and Barring Service (DBS). This brought changes to the CRB checks and vetting and barring scheme, as well as changes to the way organisations have to vet their staff. It also changed the definition of 'regulated activity' (relating to work with children).
- Equalities Act 2010 brought together over 116 separate pieces of legislation to make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all.

Ghana

- The Constitution of Ghana 1992 Article 29 guarantees people with disabilities protection against all forms of exploitation, discrimination, abusive or degrading nature. According to Article 37(3) the state shall be constitutionally guided by international human rights instruments in promoting disability rights.
- The Persons with Disability Act 2006 (Act 715) Protects people with disabilities in addressing violations of their rights.*
- The Children's Act, 1998 (Act 560) consolidated the law relating to children and the rights of the child in Ghana.
- Domestic Violence Act, 2007 (Act 732) defines domestic violence, prohibits it, and illustrates the role of police in protecting domestic violence victims.
- Commission on Human Rights and Administrative Justice Act 1993 (Act 456) This is an independent organisation for the safeguarding of human rights in Ghana made up of a Commissioner and two deputy commissioners.

6. Roles and Responsibilities

i. All Staff, Associates and Visitors shall:

- Commit and contribute to an environment where children and young people feel respected, supported, safe and protected.
- Never act or behave in a manner that results in abuse against a child or young person or places a child or young person at risk of abuse.
- Be aware of and adhere to the provisions of this Policy.

ii. All Staff shall:

- Comply with this policy, including signing the Safeguarding Code of Conduct - see Appendix 2.
- Report and respond to safeguarding concerns and breaches of the policy in line with the applicable reporting procedures.

iii. Associates and Visitors shall:

- Agree, by signing, to complying with the Safeguarding Code of Conduct

- Comply with his/her own Code of Conduct, provided the contracting Manager ensures that it complies and is consistent with this Global Policy.

iv. Senior leadership team shall:

- Make Staff, Associates, and Visitors are aware of the Safeguarding provisions set out by this policy that are applicable to their role or engagement with us.
- Support and develop systems which maintain an environment which is safe for children and young people.
- Ensure that the policy is fully embedded within their areas of responsibility.
- Record any staff training on safeguarding
- Report any abuse or possible abuse to the Trustees and/or Programme Manager

v. Trustees shall:

- Ensure appropriate Safeguarding policies are in place, updated and implemented, and are relevant to the localities in which we work.
- Ensure sufficient resources are available to effectively implement this policy locally.

vi. Organisations that work with us

- In carrying out our programmes, projects, processes, events and/or activities involving children and young people, organisations that work with us must have a Safeguarding Policy in place in line with the provisions set out by this policy.

7. Reporting

Whilst different cultures may have different levels of tolerance, Savannah Education Trust will not tolerate what it considers to be abuse or exploitation in any form, which goes against the values and aims of the organisation. It is the responsibility of all who represent Savannah Education Trust in whatever capacity, to raise their concerns regarding possible abuse appropriately. Complaints of this nature raised by non staff members should use formal complaints procedures.

7a. When to report

- Suspicions, allegations and incidents of abuse or mistreatment of beneficiaries, particularly children, should be reported if any one or more of the following things occur:
 - There has been an incident where the beneficiaries of Savannah Education Trust have been or are being abused or mistreated through the work of Savannah Education Trust or by someone connected with Savannah Education Trust such as a trustee, member of staff or volunteer.
 - There has been an incident where someone has been abused or mistreated and this is connected with the activities of Savannah Education Trust.
 - Allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place
 - There are reasonable grounds to suspect that such an incident may have occurred.

In some cases, defining the beneficiaries and people connected to the charity may not be straightforward. If unsure it is recommended good practice to seek advice or report as soon as possible. Any concerns raised will be treated with the utmost urgency, consideration and discretion.

The process of how to report abuse or suspected abuse is outlined in Appendix 3.

Appendices

Appendix 1

Definition of key terms

Vulnerable:	In the context of charities safeguarding 'vulnerable' beneficiaries, the UK Government uses the term 'vulnerable' to refer to children and young people under 18 years of age or to adults who are in receipt of a regulated activity. For the purpose of this document, it also refers to people living in poverty, who may be particularly susceptible to exploitation and abuse, although it should be noted that under UK legislation people are not recognised as 'vulnerable' simply because they are poor.
Safeguarding:	Is about embedding practices throughout the organisation to ensure the protection of children and/or vulnerable adults wherever possible. The Charity Commission defines safeguarding and promoting the welfare of vulnerable groups and children as: 'protecting from maltreatment, preventing impairment of health or development, and ensuring children grow up in circumstances consistent with the provision of safe and effective care'.
Protection:	Refers to the activity that is undertaken to protect specific groups or children who are suffering, or are likely to suffer, significant harm. It is the proactive safeguarding and promotion of the welfare of children and young people.
Abuse:	Includes all forms of physical or mental abuse, injury, neglect or negligent treatment, emotional ill-treatment or psychological abuse, sexual abuse and exploitation, harassment, and commercial or other exploitation of a child or young person. Acts of abuse can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent abuse against a child or young person. Abuse consists of anything which individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child or young person's wellbeing, dignity and survival and development.
Child:	A child is under the age of 18 (as defined in the United Nation convention on the Rights of a Child).
Direct Contact With Children:	Being in the physical presence of a child or children in the context of the organisation's work, whether contact is occasional or regular, short or long term.

<p>Indirect Contact With Children:</p>	<p>Having access to information on children and/or vulnerable adults in the context of the organisation's work, such as children's names, locations (addresses of individuals or projects), photographs and case studies.</p> <p>Providing facilities for third parties to work 'directly' with children and therefore confers upon the donor organisation responsibility for child protection issues.</p>
<p>Regulated activity for children:</p>	<p>The UK Government's definition of regulated activity (work that a barred person must not do) in relation to children covers:</p> <p>a) Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/ guidance on well-being, or drive a vehicle only for children;</p> <p>b) Work for a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, children's homes, childcare premises. Not work by supervised volunteers;</p> <p>c) Relevant personal care, e.g. washing or dressing; or health care by or supervised by a professional;</p> <p>d) Registered childminding; and foster-carers.</p> <p>Work under a) or b) is regulated activity only if done regularly eg. carried out by the same person once a week or more often or on 4 or more days in a 30-day period.</p>
<p>Manager</p>	<p>Refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Associates</p>
<p>Associate</p>	<p>Refers to a range of contracted paid and non-paid individuals who have committed to work with or support Savannah Education Trust. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments.</p>
<p>Staff</p>	<p>Refers to individuals who receive a regular salary for work for Savannah Education Trust or through any Savannah Education Trust entity.</p>

Appendix 2

Safeguarding Code of Conduct

Name	
Role	
Date	

Savannah Education Trust is committed to creating a safe environment for children and young people. All staff have a duty to uphold the principles of this policy and commit to safeguarding children and young people. Any sexual exploitation and/or abuse by staff amounts to gross misconduct and will result in termination of employment.

As such I agree that I will:

- Adhere to the Policy on Safeguarding Children and Young People and be open and honest in my dealings with children and young people, their families, and communities participating in programmes, projects, processes, events, and activities.
- Treat children and young people in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of any other factor.
- Create and maintain an environment which prevents the abuse and exploitation of children and young people ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action so as to minimise risks to children and young people.
- Contribute to building an environment where children and young people we directly engage with are:
 - respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities
 - well informed on their safeguarding and protection rights and what to do if they have a concern.
- Display high standards of professional behaviour at all times, providing a positive role model for children and young people.
- Comply with all relevant international standards and local legislation in relation to child labour, and refrain from using children and young people aged below 18 years for domestic or other labour, if such work is inappropriate, exploitative or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury, exploitation, or abuse. In addition, I understand that I must not use children and young people of any age that we work with for domestic or other labour.
- Respect the privacy and confidentiality of children and young people associated with Savannah Education Trust. This means I will:
 - Never ask for or accept personal contact details or invitations to share personal contact details from any child or family associated or formerly associated with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by Savannah Education Trust.

- Never make any contact with a child, young person, or family members associated with Savannah Education Trust's work that is not supervised by a (or another) member of Savannah Education Trust staff. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
 - Always ensure that when on an official or work visit with Savannah Education Trust and I wish to take pictures of children and young people associated with the organisation, for personal use, I will:
 - Always consult first with Savannah Education Trust Staff so as to make sure that it is acceptable to take pictures in the local context and that the intended use of the pictures does not conflict with Savannah Education Trust's policies.
 - Ask permission of the child or young person (or in the case of young children, their parent or guardian) .
 - Ensure the images are respectful and do not impact negatively on their dignity and privacy.
 - Ensure that the use of the images does not put the child or young person at risk of being identified or located.
 - Never upload the images of children and young people associated with Savannah Education Trust without the express consent of Savannah Education Trust staff
- Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a child or young person in accordance with applicable procedures of the local office.
- Cooperate fully and confidentially in any Savannah Education Trust investigation of concerns or allegations of abuse to children and young people.
- Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with Savannah Education Trust that relate to exploitation and abuse of a child or young person.

I will not:

- Abuse or exploit a child or young person or behave in any way that places a child or young person at risk of harm, including through harmful practices such as, for example, Female Genital Mutilation, forced or child marriage.
- Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18.
- Use physical punishment/discipline or use of physical force of any kind towards children and young people.
- Engage young people in any form of sexual activity which involves the exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Use language or behave towards a child or young person in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- Fondle, hold, kiss, hug or touch children or young people in an inappropriate or culturally insensitive way.
- Have a child/children/young person with whom I am in contact in a work related context, stay overnight at my home or any other personal residential location or accommodation.
- Sleep in the same room or bed as a child or young person with whom I am in contact in a work related context. Where it is necessary to sleep close to unaccompanied children and young people, I will make sure that another adult is present and it is in line with authorised procedures.

- Do things of a personal nature for children or young person, with whom I am in contact in a work related context, (e.g. taking a child/young person to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.
- Spend time alone away from others with children and young people with whom I am in contact in a work related context; I will always make sure that another adult is with me and/or I am with the child/young person in an open public place, where others are around and in plain view of others.
- Hit or otherwise physically assault or physically abuse children or young people.
- Act in ways that shame, humiliate, belittle or degrade children and young people, or otherwise perpetrate any form of emotional abuse.
- Discriminate against, show differential or preferential to, or favour particular children and young people to the detriment of them or others.
- Develop relationships with, engage in any practice with or develop behaviour towards children and young people which could in any way be deemed or interpreted as exploitive or abusive.
- Condone or participate in behaviour of children or young people which is illegal, unsafe, or abusive.
- Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully children or young people.
- Use computers, mobile phones, or video/digital cameras or other electronic devices, to access, view, create, download, or distribute pornography, especially abusive images of children or young people.

The above is not an exhaustive list. Staff, Associates, and Visitors should consider all related actions and behavior which may compromise the rights and safeguarding of children and young people.

Name	
Signature	
Date	

Appendix 3

How To Report

Step 1: If any member of staff is aware of any child abuse, it is their responsibility to tell a manager immediately. If the manager is implicated in the abuse then make another senior member of staff or Trustee aware.

Step 2: Discuss with the parents of the child (unless they are implicated). If appropriate to do so, explain that you may need to make a referral (eg. to the local police and/or the District Social Welfare department).

Step 3: The manager should make the Trustees aware of the abuse and alert the local authorities if required (eg. the local police, GES and the District Social Welfare department) and seek and follow their advice. A reporting form to be completed for the Trustees is found in Appendix 4.

Step 4: Record all information and communications with the authorities in a confidential file.

Step 5: The Trustees will report any abuse to the Charity Commission and to the UK police if a British citizen is implicated.

Step 6: The Trustees ensure that any advice, guidance or requirements set by the Charity Commission is carried out, acted upon and recorded.

Appendix 4

Report Form for Suspected Abuse

Please complete this form to the best of your knowledge if you see/observe that a child's safety may be in danger. Please note that child protection concerns must be reported to the Trustees immediately. This form can be completed before or after you have contacted the Trustees to advise them of the concern.

1. Reporter

Your name:

Your job title:

2. The suspected abused

Child's name:

Child's gender:

Child's age:

Child's school:

Child's address:

Child's guardian:

3. The problem

Was the abuse observed or suspected?

Is the issue based on first-hand information or divulged by someone else? (if so, who?):

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Did the child disclose abuse to you?

Nature of the allegation:

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Date of the alleged incident:

Time of the alleged incident:

Location of the alleged incident:

Name of the alleged perpetrator:

Job title of the alleged perpetrator:

Your personal observations such as visible injuries, child's emotional state etc. (please distinguish between what is fact and what is opinion or hearsay):

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.....

Any other information previously not covered:

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.....
.....

Were there any other children/people involved in the alleged incident? If so, please provide details:

.....
.....
.....

Have the local policy & authorities been informed?

Details of any action taken:

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.....
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Signed:

Date: