

Review history

Safeguarding Policy

1. October 2017
2. February 2018
3. January 2019
4. March 2019
5. March 2020
6. March 2021

Safeguarding Policy bifurcated into Child Safeguarding Policy and Adult Safeguarding Policy, May 2022.

CHILD SAFEGUARDING POLICY

The UK Committee for UNICEF (UNICEF UK)

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1. DOCUMENT DATE AND REVIEW SCHEDULE

This document has been presented to the Audit and Risk Committee for review on 16th June 2022.

This policy will be reviewed annually by the Audit and Risk Committee or earlier at the trustees' discretion if there are material changes in legislation, there has been a serious safeguarding incident, or a review has been requested by a UNICEF UK governance committee.

2. RESPONSIBILITIES

Trustees

The trustees of UNICEF UK have ultimate responsibility for safeguarding governance. This includes (but is not limited to) ensuring adequate measures are in place to assess and address safeguarding risk and that safeguarding policies, procedures and practices are appropriate, effectively implemented and regularly reviewed.

UNICEF UK has a Trustee Safeguarding Champion who maintains oversight and has responsibility for ensuring safeguarding governance and compliance.

[Executive Director and Executive Team](#)

The Executive Director is the risk owner of the strategic risk register that incorporates safeguarding risks.

The Deputy Executive Director for Advocacy, Programmes and Safeguarding serves as the nominated Executive Safeguarding Sponsor.

[Head of Safeguarding](#)

The Head of Safeguarding is responsible for the oversight of all safeguarding matters and in ensuring that the Executive Team and Board of Trustees are kept apprised appropriately of all safeguarding matters.

The responsibility for the updating and approval of this policy is assigned to the UNICEF UK Head of Safeguarding.

3. KEY CONTACT

The Safeguarding Team

safeguarding@unicef.org.uk

4. POLICY STATEMENT

UNICEF UK believes that every child and young person has the right to live free from abuse, harm or neglect regardless of age, ability or disability, sex, race, religion or belief, ethnic origin, sexual orientation, marital or gender status.

It is the responsibility of all UNICEF UK Personnel to behave in a way that does not place any child we come into contact with, either through our work or in the course of our employment, at risk of harm in any way. UNICEF UK will take reasonable steps to ensure that no-one is harmed as a result of the work we do and UNICEF UK acknowledges our responsibility to uphold the “do no harm” principles.

We are committed to providing and maintaining a safe and inclusive environment for everyone, where an open listening culture is adopted to support people in sharing concerns without fear of retribution.

UNICEF UK acknowledges and will ensure compliance with the key legislative and regulatory provisions and guidance documents that underpin the principles of child safeguarding and child protection, such as [The Children Acts 1989 & 2004](#), [Working Together to Safeguard Children 2018](#) and [The UNICEF Global Child Safeguarding Policy 2016](#). The Charity Commission has also published guidance in this area: [Safeguarding and Protecting People for Charities and Trustees](#) (2017).

Any actions taken by UNICEF UK will be prompt, proportionate and consistent with the principles of child safeguarding best practice to ensure the safety and welfare of the child is paramount, and where appropriate and safe to do so, includes and respects the voice of the child concerned.

5. PURPOSE

The purpose of this policy is to demonstrate our commitment to safeguarding children and to ensure all UNICEF UK Personnel are aware of:

- The legislation, policy, and procedure for safeguarding any child or young person we may come into contact with as a result of our work.
- The policy and procedure for managing and escalating a child safeguarding concern (including where a concern relates to the behaviour of an adult towards a child).

Safeguarding is everyone's responsibility in UNICEF UK but we recognise that senior leaders have a particular responsibility to set the tone and culture of an organisation to ensure best safeguarding practice is expected and normalised.

We also expect our partner organisations, stakeholders, suppliers, and sponsors to adopt and demonstrate their commitment to child safeguarding principles and practice as set out in this policy and we will undertake proportionate due diligence in relation to those we work and collaborate with (informed by the assessed level of risk) in relation to their safeguarding arrangements.

6. OUR COMMITMENT

To raise awareness of and embed best safeguarding practice throughout our work and across UNICEF UK, our approach to safeguarding is driven by the following principles:

[Principle 1. Empower & Prevent](#)

- To promote a culture where all children have an equal right to protection from harm regardless of their gender, culture, ethnicity, age, religion or belief, sexual orientation, disability or ability.
- Recognition that Children are rights holders and have a right to participate in decisions about their lives, where safe and appropriate to do so unless there are overriding reasons not to or where the child is at risk of harm.
- UNICEF UK Personnel understand their responsibility for safeguarding children and have completed mandatory safeguarding induction training within 90 days of their employment at UNICEF UK and mandatory safeguarding refresher training every 2 years.
- UNICEF UK upholds fair, consistent, and robust [Safer Recruitment](#) practices and continues to assess the suitability of employees and volunteers by undertaking DBS renewals and relevant vetting procedures every 3 years.
- Where UNICEF UK, in partnership or in its own right, plans activities or events, comprehensive and robust safeguarding risk assessments are conducted in collaboration with the Head of Safeguarding or Safeguarding Specialists to ensure the safety and well-being of all involved.
- There is an acknowledgment and understanding that a range of other policies and procedures, as detailed below, are consistent with the promotion of creating a safe culture and set out UNICEF UK's expectation of all UNICEF UK Personnel.

Other relevant UNICEF UK policies that support the creation of creating a safe environment include:

- [Dignity at Work Policy](#)
- [UNICEF UK Code of conduct](#)
- [Speak Up Policy](#)
- [Raising Concerns Map](#)
- [Safer Recruitment](#)
- [Data Protection Policy](#)
- [Well-being Policy](#)
- [Code of Conduct](#)

Principle 2. Protect & Respond

- UNICEF UK Personnel are aware of the child safeguarding procedures and know how to escalate a concern
- Where a child is at immediate risk of harm or there is a crime being committed, the relevant emergency services will be notified and/or children's social services contacted without delay (and a follow up report made to the Head of Safeguarding within 24 hours).
- Any concerns about the safety or welfare of a child must be reported to the Head of Safeguarding, or in their absence the Safeguarding Specialist, in accordance with [UNICEF UK Child Safeguarding Escalation Process](#).
- Any concern that a child is not safe or is at risk of harm is taken seriously and responded to in line with this policy. UNICEF UK recognises it takes significant courage to raise safeguarding concerns and will endeavour to place the needs and priorities of the child at the forefront.
- Anyone that reports a concern regarding a colleague in good faith will be protected under the UNICEF UK Speak Up Policy.

Principle 3. Proportionate

- Any actions taken will respect the rights and dignity of all involved and be proportionate to the risk of harm and in compliance with applicable local safeguarding procedures

Principle 4. Partnership

- As part of working in partnership we expect professionals and other stakeholders to act on our concerns in a proportionate and timely manner.
- UNICEF UK will cooperate with relevant law enforcement and local authorities in taking action to safeguard children and will share information with relevant authorities about anyone found to be a risk to children, a perpetrator of abuse, or where we believe a criminal offence has occurred.

Principle 5. Accountability

- Confidential and accurate records relating to all safeguarding concerns are maintained securely and stored in line with Data Protection Legislation.
- UNICEF UK recognises that information sharing is a key component of effective child safeguarding and data protection concerns should not be a barrier to sharing information where there is valid safeguarding reason for doing so.

- Serious breaches of this policy, the UNICEF UK Code of Conduct and/or the further guidance contained in the Safeguarding Toolkit by UNICEF UK Personnel may result in formal disciplinary action being taken in line with our Disciplinary policy and procedure; and may result in UNICEF UK ending our relationship with them.
- Any allegations or concerns relating to UNICEF Personnel may also be referred to the Office of Independent Audit and Investigations and the Charity Commission.

7. CHILD CENTRED APPROACH AND PRINCIPLES OF BEST PRACTICE

A child centred approach is fundamental to safeguarding and promoting the welfare of every child. A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.

Everyone who works with children has a responsibility for keeping them safe. No single professional can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Children have said that they need:

- **vigilance**: to have adults' notice when things are troubling them
- **understanding and action**: to understand what is happening; to be heard and understood; and to have that understanding acted upon
- **stability**: to be able to develop an ongoing stable relationship of trust with those helping them
- **respect**: to be treated with the expectation that they are competent rather than not
- **information and engagement**: to be informed about and involved in procedures, decisions, concerns, and plans
- **explanation**: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
- **support**: to be provided with support in their own right as well as a member of their family
- **advocacy**: to be provided with advocacy to assist them in putting forward their views
- **protection**: to be protected against all forms of abuse and discrimination and the right to special protection and help if they are a refugee.

Special provision should be put in place to support dialogue with children who have communication difficulties, unaccompanied children, refugees and those children who are victims of modern slavery and/or trafficking.

8. AGE OF CONSENT

In all four UK nations, the age of consent when young people can legally engage in consensual sexual activity is 16 years old. The law is there to protect children and young people from exploitation and abuse, and underage sexual activity should always be seen as a possible indicator of sexual exploitation.

It is illegal:

- To take, distribute or show indecent photos of a child;
- To arrange or pay for sexual services of a child;
- For any person in a Position of Trust (see definition below) to engage in any sexual activity with anyone under the age of 18, who is under their care or the care of the organisation they work for.

Children under the age of 13 years old can never consent to sexual activity. Any sexual activity with a child under 13 should be dealt with as a child protection matter.

9. POSITION OF TRUST

Position of Trust is a legal term that refers to specific roles where an adult has regular and direct contact with children and young people. Examples of people in positions of trust include:

- Teachers
- Care Workers
- Youth Justice Workers
- Social Workers
- Doctors
- Sports Coaches

It is against the law for anyone who holds a position of trust to engage in any sexual activity with a child or young person in their care, even if that young person is over the legal age of consent.

Whilst the law around position of trust only extends to the roles mentioned above currently, it is important to recognise that any adult that works in an environment or capacity where they hold a position of authority over children or young people has a duty to behave in a way that does not cause harm.

10. ABUSE AND NEGLECT

Child abuse is when a child or young person is intentionally harmed by an adult or another child. It can occur over a period of time but can also be a one-off action. Abuse can take place in person or online and can be physical, emotional or sexual.

Types of abuse include:

- Bullying and Cyberbullying
- Child Sexual Exploitation
- Criminal Exploitation
- Commercial Exploitation
- Child Trafficking
- Criminal Exploitation & Gangs
- Domestic Abuse
- Emotional Abuse
- Female Genital Mutilation
- Grooming
- Non-Recent / Historical Abuse
- Online Abuse & Cyber Crime
- Physical Abuse
- Sexual Abuse
- Discrimination on any of the grounds in the Equality Act 2010

Neglect is the ongoing failure to meet a child or young person's basic needs. Neglect can be difficult to spot, and often the child or young person may not realise or understand that what is happening is wrong.

There are 4 types of neglect:

1. Physical Neglect
2. Educational Neglect
3. Emotional Neglect
4. Medical Neglect

Any child or young person can suffer neglect or abuse, but some are more at risk than others. These include children and young people who:

- Have a disability
- Are in the care system
- Have complex medical needs

- Are seeking asylum.

11. RECOGNISING AND RESPONDING TO CONCERNS

Concerns about risk of harm to children and young people may come to our attention in a number of different ways, including:

Observation: Something that is observed about a child that causes concern

Disclosure: A child or young person disclosing that they have been abused, either currently or in the past

Risk Assessment: UNICEF UK risk assessment processes identifying potential safeguarding risks that could present in the future due to our own work or through work with partners

Recruitment: Information that is disclosed through safer recruitment processes.

If a child reveals abuse:

- Listen carefully to what they are saying
- Reassure them and let them know they have done the right thing by telling you
- Tell them it isn't their fault
- Let them know you will take their concerns seriously
- Do not confront the alleged abuser or carry out any investigatory steps
- Do not promise confidentiality
- Explain what will happen next (i.e. you will share the information with your safeguarding team so they can take steps to support the child)
- Raise your concerns and seek support without delay from either Head of Safeguarding or Safeguarding Specialist

If you believe that an adult or any UNICEF UK Personnel has harmed or may pose a risk of harm to a child or children, or you have any concerns about their behaviour towards a child, you must report this to the Head of Safeguarding without delay, and in accordance with the UNICEF UK Child Safeguarding Escalation Process.

When you are made aware of a safeguarding concern about a child or an adult's conduct towards a child, you must follow the UNICEF UK Child Safeguarding Escalation Process. If you are unsure if something is a safeguarding matter, you should seek guidance from the Head of Safeguarding or the Safeguarding Specialists.

If your concern relates to the Head of Safeguarding, you should report it to the Chief Executive or the Safeguarding Trustee.

It is not the responsibility of those working/volunteering on behalf of or representing UNICEF UK to decide if child abuse is occurring, but it is our responsibility to act on any concerns by reporting them.

12. RECORDING CONCERNS AND INFORMATION SHARING

It is important, when a child safeguarding concern has been identified or raised, that this is recorded and documented appropriately via the Child Safeguarding Incident Form. This should then be uploaded securely to Box and the safeguarding team alerted via email at safeguarding@unicef.org.uk.

All child safeguarding concerns should be recorded on a Child Safeguarding Incident Form within 24 hours.

Tips for recording concerns:

- Record facts – times, locations, persons involved, what the concern is.
- Ensure where possible you record accounts verbatim and avoid paraphrasing or generalising.
- If you have shared the concern without obtaining consent, record your decision making around this.
- Record the actions you have taken.
- Date any records.

13. DATA PROTECTION LEGISLATION

Data Protection Legislation provides a legal framework that allows information to be shared lawfully. The sharing of information relating to a safeguarding concern, with the right people, is central to good safeguarding practice, early intervention and detection.

Information relating to a concern about someone may include personal data. It is therefore important that compliance is maintained in accordance with all

applicable Data Protection Legislation. We must be clear about the grounds for processing, sharing information and keeping records.

Children have the same rights as adults over their personal data, even if a child is too young to understand the implications of their rights in relation to their personal data.

- All information relating to safeguarding concerns should be accurate and relevant, and should be stored securely and confidentially.
- Access to safeguarding records should only be permitted to those who need to know, such as the Head of Safeguarding and Safeguarding Specialists.
- Information should only ever be shared with those “who need to know”, this does not automatically include the child’s parent, siblings, or legal guardian.
- GDPR guidance emphasises the importance of asking children and young people to consent before sharing their personal information. If a child is able to and has capacity to decide whether they agree to their confidential information being shared then where safe and appropriate to do so, consent should be obtained.

However, if there is a child protection concern, this information must be shared with the Head of Safeguarding or Safeguarding Specialist to enable the relevant agencies to be informed, even if you do not have the child or young person’s consent.

Data Protection Legislation allows information sharing to take place within UNICEF UK and with other professionals outside of UNICEF UK too.

You must fully document and maintain an audit trail of your decision making and why you took the actions you did. This should be documented on a [Child Safeguarding Incident Form](#).

14. APPENDIX

Guidance on the application of this policy is contained in the following UNICEF UK documents:

Child Safeguarding:

- [UUK Safeguarding Toolkit](#)

Safeguarding Code of Conduct:

- [UUK Safeguarding Toolkit](#)

Adult Safeguarding including UNICEF UK Personnel:

- [UUK Safeguarding Toolkit](#)
- [Dignity at Work Policy](#)
- [Whistleblowing Policy](#)
- [Vulnerable Circumstances Policy](#)

DEFINITIONS

Child	Anyone under the age of 18 years old
Data Protection Legislation	Includes the General Data Protection Regulation (EU) 2016/679 together with the UK's transposed version following its exit from the European Union (GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulation 2003 and other local, state, national and/or foreign laws, treaties, and/or regulations, and implementations of EU Data Protection Requirements into national law.
Safeguarding Legislation	Applicable legislation protecting children and/or adults at risk and in vulnerable circumstances and/or designed to allow permitted disclosures, including: The Children Act 1989, The Public Interest Disclosure Act 1998, The Human Rights Act 1998, The Sexual Offences Act 2003, The Children Act 2004, The Safeguarding Vulnerable Groups Act 2006, The Equality Act 2010, The Care

	<p>Act 2014, The Modern Slavery Act 2015, and any successor legislation; together with binding guidance and codes of practice issued from time to time by relevant supervisory authorities.</p>
<p>Safeguarding Practice</p>	<p>A broad term that refers to all the policies, procedures and actions that an organisation takes and puts in place to ensure that anyone working on their behalf, and anyone benefitting from the work they are doing, does not come to any harm, either intended or unintended, as a result of this work taking place. It includes both policies and procedures and the culture within the organisation that either promotes or hinders best safeguarding practice.</p>
<p>Safeguarding and promoting the welfare of a child</p>	<ul style="list-style-type: none"> • protecting children from maltreatment • preventing impairment of children’s mental and physical health or development • ensuring children grow up in circumstances consistent with the provision of safe and effective care; and • taking action to ensure all children have the best outcomes

UNICEF Personnel	Anyone acting on behalf of UNICEF in any capacity including (and not limited to), employees, volunteers, production teams, Trustees, programme visit participants, community fundraisers and Ambassadors.
UNICEF UK Personnel	Anyone acting on behalf of UNICEF UK in any capacity including (and not limited to), employees, volunteers, production teams, Trustees, programme visit participants, community fundraisers and Ambassadors

This Policy has been developed with due regard to the following laws, guidance and policies.

The Children Act 1989

The United Nations Convention on the Rights of the Child

The Children (NI) Order 1995

The Human Rights Act 1998

The Care Standards Act 2000

The Sexual Offences Act 2003

The Children Act 2004

The Safeguarding Vulnerable Groups Act 2006

The Equality Act 2010

The Protection of Freedoms Act 2012

Social Services and Wellbeing (Wales) Act 2016

The UNICEF Global Child Safeguarding Policy 2016

The Charity Commission Guidance: Safeguarding and Protecting People for Charities and Trustees (2017)

Working Together to Safeguard Children 2018

The Data Protection Act 2018

The General Data Protection Regulations 2018

Government Guidance: Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)

The Children (Scotland) Act 2020