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**Safeguarding Policy**

**Version number 2.3**

**Date effective from 29th April 2025**

**Next planned review date 29th April 2027**

**Owner Kate James : Chairperson**

**Contents**

1. Introduction
2. Safeguarding
3. Safeguarding Policy Statements
4. Safeguarding of Children and Adults
5. Safeguarding Procedures
6. Communications Policy for Child and Adult Protection
7. Online Safety policy
8. Safeguarding Allegations regarding Partners

We are committed to reviewing our policy and good practice at least every 24 months.

**Next review due by date: 29th April 2027**

**Signed:**



1. **Zambia and Malawi Community Partnership**

ZMCP is a UK registered charity which operates in Zambia and Malawi. The charity’s activities in these two countries are undertaken through Partners located on the ground in Zambia and Malawi.

The charity runs a scholarship program for around 30 young people in Zambia. The day-to-day operation of this is managed by our Partner, Zambia Scholarship Fund, a US registered NGO with a Zambian registered entity operating from Kasama.

In Malawi the charity works on a holistic set of development projects through its Partner Tafika Youth Organisation (a Malawi Registered CBO) based in Mzuzu.

This policy governs the way ZMCP operates in its UK activities. Additionally, the policy provides advice and guidance for the way ZMCP Trustees and Volunteers should operate both in their home country and if they are in the field in Zambia or Malawi. We recognise the way our Partners operate is ultimately governed by the practices and policies required by their own Governments.

ZMCP works with volunteers, for example, the ShoeShare Malawi sub-brand, the Tafika Instagram account and DonorSee consultancy where individuals are acting for, and on behalf of ZMCP in undertaking tasks agreed by ZMCP Trustees. Existing and new volunteers will all be made aware of our policies.

ZMCP are contacted from time to time by individuals wanting to experience African life and development projects, for example, UK trainee doctors wanting an experience of Malawian hospitals, or students wanting an opportunity to work on a project during a gap year. ZMCP will work to connect these people with relevant organisations in Malawi or Zambia but they are not ZMCP volunteers. Rather they are volunteers for the organisations that agree have them as volunteers and as such are governed by that organisations policies and practices.

1. **Safeguarding definition, principles**

**2.1 Definitions:**

Safeguarding is the process of protecting people from abuse or neglect, enabling them to maintain

control over their lives and make informed choices without coercion. It involves empowering people, consulting them before taking action unless someone lacks the capacity to make a decision, or their

mental health poses a risk to their own or someone else’s safety, in which case, always acting in his or her best interests.

**2.1 Principles:**

**Prevention –** The act of organisations working to stop abuse before it happens, raising

awareness, providing training and making information easily accessible are all ways that they can

demonstrate prevention measures and encourage individuals to ask for help.

**Empowerment –** Ensuring people are supported and confident in making their own

decisions and giving informed consent.

**Protection –** Organisations put measures in place to help stop abuse from occurring and

offer help and support to those at risk.

**Proportionality –** Ensures that services take each person into account when dealing with

abuse, respecting each individual and assessing any risks presented, taking a proportionate

and least intrusive response to the issue presented.

**Partnership –** Forming partnerships with local communities and other appropriate

organisations provides the opportunity to work together, to create solutions, so as they can

assist in preventing and detecting risk and abuse.

**Accountability –** Safeguarding is everyone’s responsibility and accountability and having

complete transparency in delivering safeguarding practice makes sure that everyone plays

their part when it comes to safeguarding children, young people and vulnerable adults.

1. **Policy statements**

3.1 This policy covers all those conducting ZMCP business, including ZMCP Trustees and ZMCP volunteers directly representing ZMCP. Given the complexity of some safeguarding issues, this policy may not cover all issues that arise. In such cases, judgements will need to be made on a case-by-case basis, communicated to the Chairperson.

3.2 In addition to the elements of this ZMCP Safeguarding Policy which primarily relate directly to ZMCP’s own operations and activity in the UK, ZMCP actively promotes the critical importance of safeguarding throughout its work overseas.

3.3 ZMCP commits itself to an ethos of ‘do no harm’ and has high expectations from all who work for and represent us. We take seriously all those affected by our work and we have a zero-tolerance policy to the abuse of power, bullying and harassment, or other forms of misconduct, whether related to children, young people or adults.

3.4 ZMCP is committed to the protection of all, including children, young people and vulnerable adults and to the rights of the child and has responsibility to ensure that those rights are upheld. We do not tolerate any violation or infringement of those rights and strive to ensure that the needs, dignity and safety of all children, young people and vulnerable adults, regardless of gender, ethnicity, faith, ability or culture, are protected in our work.

3.5 ZMCP is committed to the highest standards of safeguarding. ZMCP Trustees and other direct representatives must agree to, and adhere to, this Safeguarding Policy. Ultimately, the Board of Trustees is responsible for safeguarding.

3.6 ZMCP is committed to always operating within the Law in England. Where there is any

suggestion of illegality it will be reported to the relevant authorities.

3.7 The ZMCP Safeguarding Policy will be reviewed at least every two years, and whenever appropriate, to ensure it is in line with all current national guidance and legislation.

3.8 ZMCP will share its Safeguarding Policy with its partners.

3.9 ZMCP will draw attention to all volunteers of its Safeguarding Policy, accessible on the ZMCP website. We strongly encourage our partner organisations working with children, young people and vulnerable adults to develop their own robust Safeguarding Policy, tailored to their own work and compliant with the legal needs and societal expectations in this domain in both Zambia and Malawi.

3.10 ZMCP will follow standard practice where a volunteer or Board Trustee is implicated in a safeguarding issue i.e. if a volunteer is implicated, the Chairperson would lead any investigation; if the Chairperson is involved, the Trustees would lead and seek neutral advice externally.

3.11 ZMCP expects trustees or volunteers to raise issues, concerns or complaints to the Trustees or Chairperson in the first instance. These will always be taken seriously and will be escalated as appropriate.

3.12 ZMCP has a duty to protect trustees and volunteers from any detriment as a result of their whistleblowing actions. This includes protection of the identity of any person who raises a concern.

3.13 ZMCP is a learning organisation, striving for continual development and encourages all feedback to this policy and procedures, through the Chairperson.

1. **Safeguarding of children, young people and vulnerable adults**

**4.1 Definitions**

ZMCP considers a CHILD to be anyone under the age of 16.

ZMCP considers a YOUNG PERSON to be anyone between the ages of 16-18 and treats them as adults.

ZMCP considers ADULTs at risk of harm to be individuals aged 16 years or over, who are unable to safeguard themselves, their property, rights or other interests from the risk of harm because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than others who are not so affected.

ABUSE is defined as a form of maltreatment of a child, young person or adult.

**4.2 Key personnel are defined below:**

Trustees – Members of the ZMCP Board who all have a responsibility to review the safeguarding policy and act on safeguarding concerns.

UK contractor – a business or consultant contracted in the UK working for ZMCP.

Volunteer - a volunteer who works under the guidance of ZMCP in the UK or overseas on an unpaid basis.

Partners – organisations which deliver projects funded by or through ZMCP.

Child Protection Officer (CPO) – A trustee designated as the Child Protection Officer.

**4.3 Principles of Child, Young Person and Vulnerable Adult Protection**

All children, young people and vulnerable adults have equal rights and their welfare is always promoted.

Children, young people and vulnerable adults are protected from any form of sexual, physical, verbal or emotional abuse or exploitation and their health and safety is always paramount.

Children, young people and vulnerable adults are empowered to participate freely in decisions which affect their lives, recognising the importance of parents, families and other carers in their lives.

Children, young people and vulnerable adults are treated with respect and valued as individuals and equals with respect to the context of their own culture, religion and ethnicity.

Children, young people and vulnerable adults are empowered to raise and discuss any concerns and are always listened to.

Any allegation of abuse is treated seriously and dealt with appropriately and promptly. Victims and other involved parties are supported and perpetrators are held to account.

Investigation of any safeguarding concern is conducted with reference to national laws and employment rights and immediately referred to relevant statutory authorities where appropriate.

Trustees and volunteers are recruited, supported and trained with respect to the Safeguarding Policy.

**4.4 Code of Conduct**

ZMCP Trustees, volunteers and other direct representatives:

* Never hit or physically abuse a child, young person or vulnerable adult in any way.
* Never knowingly place a child, young person or vulnerable adult in danger or at risk of abuse.
* Never have sexual contact or use sexualised language with a child, young person or vulnerable adult.
* Never develop personal relationships or fondle, hold, kiss, hug or touch a child, young person or vulnerable adult inappropriately.
* Never intentionally behave in a way that frightens or intimidates a child, young person or vulnerable adult.
* Never do things of a personal nature for a child, young person or vulnerable adult that they can do for themselves.
* Never single out a child, young person or vulnerable adult for special treatment.
* Never invite a child, young person or vulnerable adult into their home or arrange to see them outside project activities unless authorised by the Child Protection Officer.
* Never stay alone overnight with a child, young person or any vulnerable adult.
* Never take a child, young person or vulnerable adult alone in a car, except in exceptional circumstances.
* Never hire a child, young person or vulnerable adult for any service, or treat in any way which could be deemed exploitative.
* Never use internet resources such as social networking sites to make inappropriate contact with children, young people or vulnerable adults which could lead to or constitute abuse.
* Never use racist, sexist, discriminatory, inappropriate, abusive or offensive language.
* Never intentionally humiliate or degrade anyone.
* Never smoke, use illegal drugs, consume or be under the influence of alcohol in the presence of children, young people or vulnerable adults.
* Always treat children, young people and vulnerable adults with respect.
* Always listen to children, young people and vulnerable adults and their concerns.
* Always use sensitive language when a child, young person or vulnerable adult reveals a serious issue (such as abuse or sexual violence).
* Always be accompanied by another adult when in the presence of children, young people and vulnerable adults.
* Always deal with any allegations or concerns relating to abuse immediately and appropriately in accordance with prevailing Child and Vulnerable Adult Protection Procedures.
* Always be aware of the health and safety of children, young people and vulnerable adults and ensure that they are protected from harm when they are in our care.
* Always respect the rights of children, young people and vulnerable adults and empower them to be aware of and act upon their rights.
* Always challenge the mistreatment of children, young people and vulnerable adults and report any suspicions or allegations that may breach the safeguarding policy.
* Always ensure that images of children, young people and vulnerable adults are respectful and obtain permission from a child, young person or vulnerable adult and/or their parent/guardian or carer before using their image (ideally before the image is taken). This applies to images taken in UK or overseas.

**4.5 Awareness raising and training:**

4.5.1 The ZMCP Safeguarding Policy is freely available to all ZMCP Trustees, volunteers, partners and other representatives. The Safeguarding Policy is regularly referenced in appropriate documents.

4.5.2 All Trustees are required to have read, and confirmed their acceptance of the Safeguarding Policy within two months of appointment. The ZMCP CPO is required to undertake safeguarding training within two months of starting their position within ZMCP. The ZMCP Chairperson is responsible for ensuring that the CPO has participated in Safeguarding training and can show an understanding of the Policy and its implications.

4.5.3 All new and existing Trustees and volunteers are required to follow the ZMCP Code of Conduct (as in Section 4.4 above).

4.5.4 Every two years Trustees are to formally review and agree to the latest ZMCP Safeguarding Policy.

4.5.5 Child, young person and vulnerable adult protection issues, including health and safety issues, are always considered in relation to any ZMCP event or visit.

4.5.6 Recruitment of new Trustees and volunteers is only carried out with unanimous agreement by all Trustees.

**4.6 Prevention Measures**

4.6.1 ZMCP Trustees and volunteers will always endeavour to ensure that another responsible adult or teacher is present when working with children. ZMCP trustees and volunteers must minimise the likelihood of situations occurring in which they are lone adults working with one or more children.

4.6.2 All children working as volunteers are supervised by their legal guardian or by a responsible adult nominated by their legal guardian whilst undertaking voluntary work for the ZMCP. Adults do not supervise more than six children each.

4.6.3 ZMCP trustees or volunteers working with groups of children who are volunteering for ZMCP, ensure that school or relevant group leaders have obtained the necessary permission from parents or guardians. Responsibility for these children remains with the school or group.

1. **Safeguarding procedures**

5.1 ZMCP Trustees and volunteers will respond sensitively to any safeguarding issue that they witness or is disclosed to them and treat the issue confidentially. If a disclosure of abuse is made, ZMCP Trustees and volunteers should:

* find a quiet place, where the individual feels comfortable, to listen to the individual,
* stay calm, listen carefully and take the allegation seriously,
* not promise to keep it secret but explain that they need to tell someone else,
* stress that the individual was right to tell them, that they have taken it seriously, and that they have understood what they have been told,
* only ask questions for clarity and not ask for explicit details nor ask leading questions,
* take notes after the disclosure using the voice of the disclosing party,
* reassure the individual that they will take steps to help them and tell them what will happen next.

5.2 Any ZMCP Trustee or Volunteer who witnesses or is informed of any potential breach of the Safeguarding Code of Conduct must report the concern to the Child Protection Officer as soon as possible.

5.3 ZMCP Trustees and Volunteers should be confident that the serious disclosure of any allegation will not impact on their position or reputation within ZMCP.

5.4 ZMCP Trustees and Volunteers must inform the Child Protection Officer(CPO) of any allegation or concern immediately. If for any reason this is not possible, they must ensure that the matter is referred to an appropriate person, to ensure the concern is managed with the necessary urgency.

5.5 The Child Protection Officer is responsible for the management of the issue of concern. Trustees and volunteers should not seek to conduct their own investigation or discuss the issue with any other parties. In the first instance, specific consideration will be given to whether the disclosure constitutes a safeguarding issue. If not, alternative processes should be followed.

5.6 The Child Protection Officer is responsible for ensuring that all records of any breach of the code of conduct are full and detailed, are treated confidentially and stored securely. Records should be deleted after an appropriate time has elapsed, with disposal reviewed every two years.

5.7 ZMCP will follow a victim-centred approach in its handling of safeguarding matters and will balance this with public interest given the nature of any specific complaint. ZMCP will not discuss with a victim the detail of how the matter is being dealt with in relation to the alleged perpetrator.

5.8 ZMCP recognises that where a disclosure is made by an adult of sound mind and where there is no compelling evidence of an immediate risk to that or other individuals, then ZMCP will usually follow the wishes of this individual if they state that they do not want the matter investigated or referred elsewhere, unless this compromises legal or moral obligations. There may also be circumstances where ZMCP receives incomplete, or second-hand information, and is not reasonably able to collect any further information. In such circumstances the course of action followed must be in line with the standard procedures and with the full agreement of the CPO and a comprehensive Case Handling Report would be compiled. This can be made available for External Expert Review, while protecting identities. Such cases will be dealt with on a case-by-case basis.

ZMCP recognises that a Safeguarding Policy cannot foresee every scenario. There may be rare cases where Trustees are of the view that some aspect of policy or process should be amended in order to (a) most effectively safeguard those involved, or (b) comply with English Law. In such instances Trustees are able to deviate from the processes outlined in this policy as long as:

* There is unanimous agreement
* A clear case report is made outlining the reason for this decision, and kept for five years
* There is an external expert review of this decision after the event
* This aspect of the ZMCP Safeguarding Policy is reviewed following this expert review

5.9 Partners are expected to inform ZMCP of any safeguarding concerns that occur within ZMCP funded projects as soon as possible. Failure to do so may lead to suspension of the Partner.

5.10 Any safeguarding concern relating to Partners which is raised by Trustees, volunteers or members of the public must be properly recorded and raised with the Child Protection Officer who will manage any response to this.

5.11 The Child Protection Officer is responsible for ensuring that an enquiry into any concern is conducted as soon as possible where there has been an alleged breach of the Code of Conduct. The CPO should always refer any reported concern to the Chairperson who may decide to report this to the Board of Trustees for consideration of appropriate actions to be taken. A full report should be written.

5.12 Where there is alleged illegality, the Chairperson must ensure that the concern is referred to the relevant statutory authorities (i.e. Police /or official child/adult protection services), in the most appropriate manner, to ensure that the child, young person or vulnerable adult is protected from any further harm.

5.13 It may be necessary for a Trustee or volunteer to be suspended whilst fact-finding is taking place. It will be made clear that suspension is not an indication of guilt on the subject of the complaint: it is suspension without prejudice. Following a full enquiry, if no breach has taken place, the suspension will be removed and records of any enquiry will be destroyed within one year of the conclusion. If there has been a breach, ZMCP will remove the suspension and confirm whether the relevant Trustee or Volunteer is to continue to be part of ZMCP. Trustees and volunteers have the right to respond to this as appropriate.

5.14 ZMCP will endeavour to ensure that anyone who has been affected by any breach of the code of conduct is given immediate and appropriate support and care, and that steps are taken to ensure that they receive appropriate long-term support where necessary. ZMCP will take advice from appropriate leading agencies in this scenario to ensure such support is appropriate and to a high standard.

5.15 ZMCP Partners should report the outcome of any internal analysis regarding a child, young person or vulnerable adult protection concern to ZMCP as soon as possible. ZMCP expects Partners to ensure that appropriate actions are taken in relation to any concern. In cases where ZMCP judges that sufficient actions have not been taken, ZMCP may choose to end a Partner relationship.

1. **Communications Policy**

We live in a world where images, audio and films of children, young people and vulnerable adults are often exploited and we recognise that children are particularly vulnerable to trafficking and abuse. ZMCP is committed to the protection of children, young people and vulnerable adults as a fundamental principle of the way it works and to ensure that their rights are respected, while allowing ZMCP to report on the work of its partner organisations using stories and images (both still and moving).

This section sets out ZMCP’s policy and practice in the gathering and publication of images, video footage, audio and text referring to children, young people and vulnerable adults.

**6.1 Use of images, audio, films and stories**

ZMCP’s communications will respect the individual’s dignity. We will strive to:

* Portray children, young people and vulnerable adults as realistically as possible, in their own context, without being overly sensational or overly positive, and without portraying them as victims;
* Ensure that children, young people and vulnerable adults and their legal guardians are fully informed of any possible risks and made aware of their rights so that they can make informed decisions about sharing their story;
* Ensure that participants see how their story is used in ZMCP materials;
* Empower children, young people and vulnerable adults through telling their story.
* Ensure that the welfare of children, young people and vulnerable adults is paramount and that their interests and safety always take priority over any editorial requirement.
* Ensure that images and/or stories about children, young people and vulnerable adults cannot be misused or exploited.

**6.2 Consent**

6 .2.1 Wherever possible, as well as gaining consent from the child, young person or vulnerable adult, ZMCP shall acquire verbal or written consent from the parent, carer or whoever is acting in loco parentis to use images and stories for external communication. This may not always be possible when dealing with crowd shots.

6.2.2 No payment or reward shall be given in order to gain consent.

6.2.3 All recipients of support from a ZMCP partner organisation will be made aware that this does not make them obligated to participate in our communications.

6.2.4 ZMCP may decide not to publish a story if it is regarded as damaging to the child’s interest even if informed consent has been received.

**6.3 Confidentiality**

6.3.1 While it is extremely important to publish real stories and photographs for the sake of authenticity and transparency, ZMCP shall strive to protect identities on two fronts:

1. To avoid the exploitation of images and stories by those who may wish to misuse them; and

2. To protect people from being stigmatised or mistreated in their own communities as a result of any publication arising from the interview or subsequent publication of photographs or images.

6.3.2 ZMCP will not use the family name of a child, young person or vulnerable adult in external communications and/or reports to donors. Combinations of information which could allow the individual to be identified will be used with care consideration, and only when it is believed to be in the individual’s best interest.

6.3.3 Exception to the above guidelines can be made when the audience for a particular communication is limited and is known by ZMCP (e.g. a letter to major donors or a funding report to a known funding agency). Family names and school names may be used for the sake of transparency to illustrate non-sensitive stories in these circumstances.

**6.4 Interviewing Children, Young People and Vulnerable Adults**

6.4.1 All interviews will be conducted with care and sensitive to the welfare and safety of the individual. The cultural values, interests and priorities of the individual must be honoured and child-friendly language should be used. Information should be shared with the interviewee in a transparent way.

6.4.2 Care should be taken so that people are free to express their feelings about the assistance given to them, so that ZMCP’s partners’ community work is reinforced by the respect and protection accorded the individual. Questions that are overly intrusive or sensationalised will not be allowed.

1. **Online safety policy**

**7.1 Purpose**

ZMCP works through Partners who work with children and families as part of their activities. These include activities both in person and online such as trainings, meetings and events. The purpose of this policy statement is to:

* ensure the safety and wellbeing of children and young people is paramount when children, young people and adults are using the internet, social media or mobile devices as part of any of ZMCP’s projects.
* ensure that, as an organisation, we operate in line with our values and within the law in terms of how online devices are used.

**7.2 Legal Framework**

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in the UK and abroad. Summaries of the key legislation and guidance are available on:

* online abuse: learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse
* bullying: learning.nspcc.org.uk/child-abuse-and-neglect/bullying
* child protection: learning.nspcc.org.uk/child-protection-system

**7.3 Policy Statements**

These policy statements apply to all Trustees, volunteers and anyone involved in ZMCP’s activities.

7.3.1 We believe that children, young people and vulnerable adults should:

* never experience abuse of any kind;
* be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times;

7.3.2 We recognise that:

* the online world provides everyone with many opportunities; however, it can also present risks and challenges;
* we have a duty to ensure that anyone involved in our organisation is protected from potential harm online;
* we have a responsibility to help keep everyone using ZMCP’s network or devices safe online;
* working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people’s welfare and in helping them to be responsible in their approach to online safety.

7.3.3 We will seek to keep children, young people and vulnerable adults safe by:

* providing clear and specific directions to trustees and volunteers on how to stay safe and behave online through our IT behaviour code;
* supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others;
* supporting and encouraging parents and carers to do what they can to keep their children safe online;
* having at least two ZMCP trustees / volunteers present on all social media platforms and interactions which ZMCP has established to engage with children and young people under 18;
* developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person;
* ensuring that user names, logins, email accounts and passwords are used effectively;
* ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate;
* examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

7.3.4 If online abuse occurs, we will respond to it by:

* having clear and robust safeguarding procedures in place for responding to abuse (including online abuse);
* providing support and training for trustees and volunteers on dealing with abuse, including, where appropriate, bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation;
* making sure our response takes the needs of the person experiencing abuse as a priority.
1. **Safeguarding allegations concerning Partners:**

ZMCP recognises that it may receive safeguarding allegations concerning the work of its Partners.

8.1 ZMCP makes it clear externally that it is not responsible for, or liable for, its Partners work, including in terms of safeguarding.

Notwithstanding the above, ZMCP will take seriously any safeguarding allegations relating to any of its Partners of which it becomes aware.

8.2 Decision-making regarding the handling of safeguarding allegations concerning Partners will be led by the ZMCP’s CPO, with input as required from the Trustees. All decisions to suspend or cancel a ZMCP Partnership must be made by the Board.

8.3 The primary responsibility of ZMCP in receiving safeguarding allegations is to ascertain whether the allegations are criminal in nature. If there are credible grounds to believe there is alleged criminality, or if anyone is in imminent danger, ZMCP’s immediate responsibility is to inform the police or relevant authority.

8.4 Responsibility for due reporting and investigation lies with the Partner concerned.

8.5 If the alleged abuse has occurred in Malawi or Zambia, the investigation should be undertaken by appropriate authorities within Malawi or Zambia.