



Sabre Education Safeguarding Policy & Procedures

1. Introduction

Sabre Education recognises that it must put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people and adults at risk (together referred to as 'vulnerable people' under this policy, and explained in the definitions given below), including those with whom we work and those in the communities where Sabre Education work is undertaken.

Sabre Education's commitment to safeguarding is reflected by the frequent consideration of safeguarding issues at all significant decision-making points in the organisation including in risk assessment at all levels, the positive discussions around safeguarding by staff as part of their daily work, and the strong awareness that *'it could happen here'* within the organisation.

Safeguarding is the responsibility that Sabre Education has to ensure that children, young people or adults at risk are safe from discriminatory abuse, neglect or acts of omission, self-neglect, organisational or institutional abuse modern slavery, financial or material abuse, psychological or emotional abuse, sexual abuse, domestic violence, physical abuse and exploitation while in the care of, or under the supervision of Sabre Education employees and volunteers, partners, operations and programmes. It is also the responsibility that Sabre Education has to ensure that any concerns about the safety of vulnerable people within the communities in which it works, are dealt with and reported to the appropriate authorities, and the responsibility that Sabre Education has for protecting its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

Child protection is a central part of and not separate from safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or as a result of activities undertaken as part of our programme of work. It also includes measures and structures designed to prevent and respond to abuse.

Over recent years, there has been increasing recognition of the way in which children, young people and adults at risk can be exposed to discrimination, neglect, abuse and exploitation by those who are in positions of trust and power over them, including through international development activities.

As a consequence, there has been a significant increase in the efforts made by development organisations to ensure that no harm results from the contact their employees, volunteers and other representatives have with their target populations or communities.

Through its work, Sabre Education employees, employees of partner organisations and volunteers may engage with children, young people and adults at risk either directly or indirectly.

Sabre Education Limited

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2. Purpose

The purpose of this policy and associated procedures is to provide clarity to **ALL** on how they should engage with children, young people and adults at risk when working for, on behalf of, or in partnership with Sabre Education. It is also to help us make sure that employees, volunteers and other representatives are protected.

It is intended to help us to have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which we operate and thereby increase accountability in this crucial aspect of our work, and inform additional training which may be required in addition to regular universal training.

This policy constitutes Sabre Education's global policy, and applies wherever Sabre operates. Whilst it is recognised that legislation may vary from country to country, this policy identifies our minimum standards and may exceed the requirements of local legislation.

Any breach of this policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, withdrawal of volunteer status, and reporting to the police, relevant regulatory authority or other body.

3. Definitions

Abuse - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, domestic, financial or sexual abuse, modern slavery, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or adult at risk. Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Discriminatory abuse - abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Modern Slavery - The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.

Domestic abuse or violence or intimate partner violence - a pattern of behaviour in any relationship that is used to gain or maintain power and control over an intimate partner.

Neglect - the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Examples include failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect them from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation

or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Sexual abuse - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child - Sabre Education regards a child as anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. This is in accordance with the UN Convention on the Rights of the Child, and the Ghana Children's Act 560. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Vulnerable person/people - for the purposes of this policy this is an umbrella term which covers children, young people and adults at risk.

Adult at risk - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, or a perceived or real imbalance of power, may be unable to take care of or to protect him or herself against abuse, harm or exploitation.

Youth or young people - individuals aged 15 to 25 (15 to 35 in some countries) – Sabre Education recognises that this group spans the categories of 'children and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

4. Scope

This policy is mandatory for all Sabre Education employees worldwide. For the purposes of this policy, 'employee' is defined as anyone who works for or on behalf of Sabre Education, either in a paid or unpaid capacity. This therefore includes directly employed staff, trustees, contractors, employees and volunteers of sub-contractors, agency workers, consultants, teachers on training programmes, volunteers, interns and all visitors to Sabre Education work programmes and offices.

This policy demonstrates how Sabre Education will meet its legal obligations and reassure volunteers, employees, partners and members of the public:

- a) On what they can expect Sabre Education to do to protect and safeguard vulnerable people.
- b) That they are able to safely voice any concerns through an established procedure.
- c) That all reports of abuse or potential abuse are dealt with in a serious and effective manner.
- d) That there is an efficient recording and monitoring system in place.
- e) That employees, volunteers, sub contracted agencies and partners receive appropriate induction on safeguarding.
- f) That a robust 'safe' recruitment procedure is in place.

5. Policy Statement

Sabre Education has zero tolerance against abuse and exploitation of vulnerable people. Sabre Education also recognises that safeguarding is everyone's responsibility and that it has an obligation

to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we work.

6. Principles

Sabre Education works to the following key principles to protect vulnerable people:

- Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- Sabre Education will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or adult is at risk or is actually harmed.
- Sabre Education will ensure that employees and volunteers are inducted in our Safeguarding Standards and Procedures as a key part of the recruitment and onboarding process.
- Sabre Education will ensure that all partners are informed and in compliance with the standards set out by this safeguarding policy.
- When working with or through partners or sub contracted agencies, Sabre Education will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- Sabre Education recognises that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact.
- Sabre Education respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a need to know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- Sabre Education commits to monitoring the implementation of this safeguarding policy.

This policy will be reviewed annually or when there are substantial organisational changes.

Cultural sensitivity:

Sabre Education seeks always to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. We recognise that there are many different ways of thinking about and taking care of vulnerable people and making sure they are protected. It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act.

As an international organisation, we endorse the United Nations Convention on the Rights of the Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and article 19 which accords equal rights to protection for children from abuse. Every child matters everywhere in the world. Culture must not be used as an excuse to abuse children, young people or adults at risk.

7. Responsibilities

7.1. All

All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

All people working with Sabre Education **will:**

- Read, understand and adhere to the Sabre Education Safeguarding Policy and Sabre Education Code of Conduct
- Strive to promote a zero-tolerance approach to discrimination, sexual harassment and abuse in all working environments

- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty
- Place the safety and welfare of vulnerable people above all other considerations
- Report any concerns they may have about the welfare of a child or vulnerable person
- Report any concerns they may have about the behaviour of a Sabre Education representative in relation to safeguarding
- In a one-to-one situation with a vulnerable person, where privacy and confidentiality are important, try to make sure that another adult (e.g. a co-worker) knows the contact is taking place and why. If possible, ensure another adult is in sight and that the vulnerable person knows another adult is around

All people working with Sabre Education **will not**:

- Sexually harass, assault or abuse another person
- Physically harass, assault or abuse another person
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe
- Develop, encourage or fail to take action of relationships with a vulnerable person which could in any way be deemed sexual, exploitative or abusive
- Act in ways that may be violent, inappropriate or sexually provocative
- Agree to keep a secret of a vulnerable person which has implications for their safety or the safety of others.

7.2. Managers

Managers at all levels are responsible for ensuring all people working with Sabre Education are aware of this policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards anyone who complains about breaches in this policy.

7.3. Designated Safeguarding Officers

Designated safeguarding officers are responsible for handling reports or concerns, about the protection of vulnerable people, appropriately and in accordance with the procedures that underpin this policy. The responsibility of managing the safeguarding of vulnerable people can be both demanding and challenging, and therefore must be appointed at managerial level to personnel who are available. Our Lead and Deputy Safeguarding Officers have completed the online SAFE international child protection training course.

Our **Lead Safeguarding Officer** is:

- Name: James Ayando, Director of Programmes
- Contact details: +233 257964397 or james.ayando@sabre.education

Our **Deputy Safeguarding Officers** are:

- Name: Edith Anoku, HR Manager
- Contact details: +233 201771891 or edith.anoku@sabre.education
- Name: Abigail Gough, Fundraising Manager
- Contact details +44 7460484503 or abigail.gough@sabre.education

Our **Strategic Safeguarding Lead** is:

- Name: Ian Bauckham, Trustee
- Contact details: +447867508889 or bauckham@tenaxschoolstrust.co.uk.

The Lead Safeguarding Officer is responsible for:

- monitoring and recording safeguarding concerns
- ensuring referrals to the relevant authorities happen without delay
- updating safeguarding training for all staff
- ensuring this policy is reviewed annually or when there are substantial organisational changes

- ensuring it is implemented throughout the organisation and safeguarding training given
- ensuring monitoring and recording procedures are implemented
- ensuring information is triangulated across different sources as one specific piece of information may not itself raise a concern, but when seen alongside other pieces of information a picture of concern may emerge.

The Deputy Safeguarding Officers should be available to support or cover for the nominated lead. They will also handle any complaints or allegations against the nominated lead if appropriate.

7.4. Trustees

The Strategic Safeguarding Lead is the Board of Trustees' nominated representative for Safeguarding matters. Collectively, the Board of Trustees holds ultimate accountability for this policy.

The Trustees also hold ultimate accountability for Whistleblowing and the way the charity's governance. Any concerns regarding how Sabre Education is run or governed should be reported to the Charity Commission for England and Wales, other concerns should be reported in accordance with Sabre Education's Whistle Blowing Policy

8. Procedure Overview

8.1. Rigorous Recruitment

We conduct a rigorous process for recruiting all staff, paid or unpaid.

We always take up at least two written references and for all Ghana staff we ask about every potential appointment's suitability to work with children and young people. All UK staff and board members go through a basic criminal record check, via the Disclosure and Barring Service (DBS). For all new Ghana based staff we require a police records check in Ghana. Residents of other countries will undergo the appropriate background check for their country of residence.

At interview we have sound procedures and recording to ensure we are satisfied, and can evidence that the applicant is appropriate and suitable.

8.2. Induction and Training

In line with SAFEcic recommendations we have a clear induction and training strategy detailing clear job descriptions and responsibilities.

Advice, support and training on safeguarding is provided to all Board of Trustees, employees, contractors and volunteers on:

- What they should do in the event of a disclosure
- What to do if they have concerns about the welfare of a child, young person or vulnerable adult.
- How to recognise signs of abuse
- What to do if they have concerns about a Sabre Education employee, volunteer, or employee of a partner organisation
- Where to go for advice and support within the organisation.

All staff complete our in-house safeguarding course, which is drawn from the online SAFEcic international child protection training course, and also covers Sabre Education's Whistleblowing Policy and Complaints Procedure.

All Sabre Education employees and volunteers must sign and abide by this safeguarding policy and the Code of Conduct. The code sets out the standards of practice we expect of employees and volunteers - in terms professional competence, integrity, acting as a representative and in safeguarding - which support our vision, mission and values. (For more detailed guidance, refer to the Sabre Education Code of Conduct).

We also agree a probationary period of 6 months with clear goals and then provide appraisals at regular intervals of 6-12 months.

We also circulate and make available to everyone by training, poster, and staff handbook, our confidentiality statement, complaints procedures, allegations and “whistleblowing” statements and disciplinary and grievance procedures.

8.3. Confidentiality

We are committed to protecting all personal information and use it in accordance with all applicable laws concerning the protection of personal data, including the General Data Protection Regulation (GDPR). We will not do anything with somebody’s personal information that they would not reasonably expect. Guidance on confidentiality and information sharing is made available to staff.

We fully endorse the principle that the welfare of vulnerable people overrides any obligations of confidence – if maintaining a confidence could feasibly lead to a vulnerable person being at risk, then the confidentiality must be broken and the information passed on without delay. Individual cases will only be shared or discussed on a “need to know” basis.

Under “whistleblowing” anyone in our organisation may refer direct to either social care services or the police (or other local regulator or agency as relevant) if they are concerned that a child is at risk of harm and this policy is not being adhered to.

All media enquiries will be handled by the Lead Safeguarding Officer. Sabre Education’s [Whistleblowing Policy](#) outlines the steps to follow in reporting any concerns, as well as signposting avenues for external reporting.

8.4. Minimum Standards

Where employees or volunteers are contracted by other employers, or when working with partners, sub-contracted agencies, Sabre Education will brief them on our safeguarding policy and ask for information on how the organisation works to protect vulnerable people and ensure that they meet the standards set out by this safeguarding policy.

8.5. Social Media

Sabre Education has policies regarding the media and the use of actual names and images, including photographs and recordings, which should be applied in all situations. Specifically relating to protection of children, young people and adults at risk, we will:

- Use names and images of children, young people or adults at risk which are respectful and not expose them to further vulnerability (not degrading or showing sexual images of children naked or partially clothed).
- Reproduce images and use names of children only where we have the written permission of their parents / guardians using a consent form.
- Reproduce images and use names of young people and adults at risk only where we have their written permission or that of their parents/guardians, whichever is the most suitable.
- Make clear to vulnerable people and their families that agreement to providing information or images is not a condition of involvement in Sabre Education activities and programmes.
- Inform employees, volunteers and partners about Sabre’s IT policies in relation to the use of technology, and understand that they must not use this technology for the purpose of accessing, producing or distributing any information or violent or sexual images that are harmful to vulnerable people. This includes adult pornography.

8.6. Handling Disclosures

A disclosure may be made verbally or through play or through the behaviour by a child, young person or an adult and it is important for everyone to remember the following:

If you are concerned about a vulnerable person it is important that this information is communicated to the lead and/or deputy for safeguarding.

You may become aware of suspected or likely abuse by:

- your own observations and concerns;
- being told by another person that they have concerns about a vulnerable person;
- the vulnerable person tells you;
- the abuser tells you.

Also remember that you may not always be working directly with the vulnerable person but become concerned because of difficulties experienced by other adults e.g.

- Domestic violence incidents
- Mental health issues
- Substance and alcohol abuse incidents

Other concerns may be:

- Children living away from home or gone missing
- Peer abuse including bullying
- Race and racism
- Radicalisation
- Violent extremism
- Sexual exploitation
- Female genital mutilation
- Forced marriage
- Concealed pregnancy
- Child trafficking
- eSafety (online/internet).

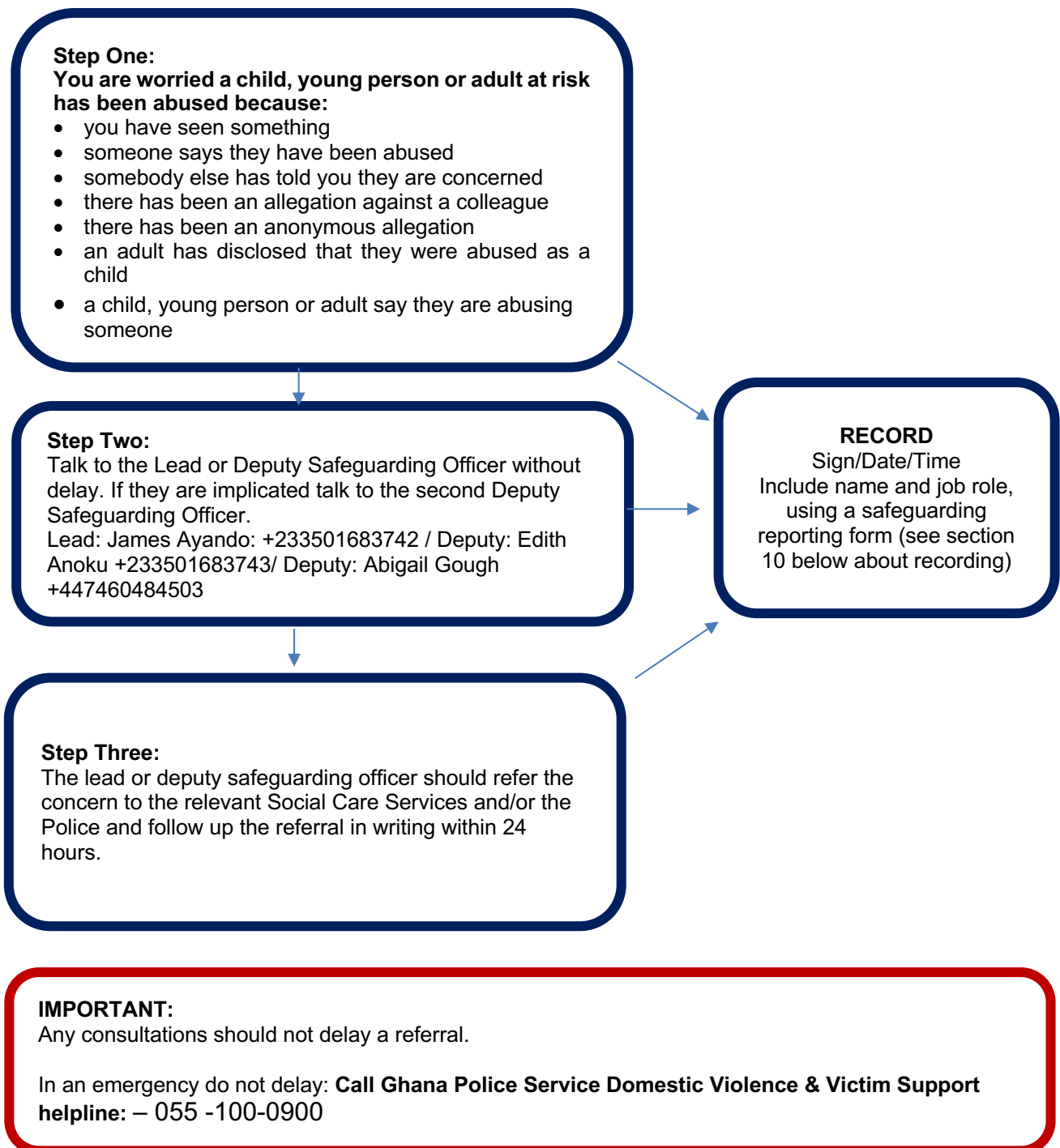
Remember:

- Do not delay.
- Do not investigate.
- Seek advice from the safeguarding lead or deputy.
- Make careful recording of anything you observe or are told.

8.7. Responding to Concerns

We ensure and emphasise that everyone in our organisation understand and know how to share any concerns immediately with the lead and deputy for safeguarding. We do this by training, posters and staff handbook. At staff meetings, reminders on how to handle safeguarding concerns will be given to staff. Everyone including both the lead and deputy for child safeguarding will deal with concerns using the following procedures:

Flowchart 1: Responding to a Safeguarding Concern:



8.8. Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures

We have clear policies in line with SAFEcic recommendations about handling allegations, dealing with complaints and our own disciplinary and grievance procedures and these details will be made available to all adults, children, parents and carers as necessary by training, posters and staff handbook.

We are mindful that the three procedures may confuse the next appropriate steps to take. We are clear that, in any case where a complaint or allegation has been made with regards to any safeguarding issue, in the first instance we will discuss the situation with the appropriate agency, for example children's social care services, before making an open decision about the best way forward.

It is the responsibility of the safeguarding lead and/or deputy to ensure that these procedures are rigorously adhered to. In the case that the safeguarding lead is implicated, the deputy should be informed. In the exceptional circumstances that both are involved, it is the duty of the person concerned to contact the appropriate agency direct.

FOR UK CITIZENS

Once the referral abroad is reported, the lead or deputy should report the matter to UK social care services and/or the police.

In relation to child protection concerns, children's social care services will manage any investigations, overseen by the Local Authority Designated Officer (LADO) in accordance with Local Safeguarding Children Board (LSCB) procedures. A full list of LSCBs is available here:

<https://www.safecic.co.uk/your-scb-acpc/55-free-downloads-and-safeguarding-links/61-safeguarding-children-board-links>

With regards to adult safeguarding concerns, disciplinary and grievance procedures, we are very clear that we will take no steps until we have fully discussed and agreed a strategy with the Local Authority Designated Officer, social care services and/or the police. Any investigation will override the need to implement any such procedures. Providers of child care, educational, health or other formal services are responsible for making any referral of an individual who does or may pose a danger to children, young people and/or adults at risk. Other organisations will liaise with their LADO and local agencies if such a referral needs to be made.

FOR NON-UK CITIZENS

The lead or deputy safeguarding officer will liaise and be advised by local agencies in the relevant country and apply internal disciplinary procedures when appropriate

9. Ethical fundraising

We are committed to our fundraising being:

- Open
- Honest
- Transparent
- Fair

We will protect the public by;

- Identifying and terminating conversations with potentially vulnerable members of the public
- Our representatives being clearly identifiable through appearance.

No pressure will be used to obtain donations and/or donor contact details. Personal details are collected on an opt-in basis only.

More information is contained within the Sabre Education [Ethical Fundraising Policy](#).

10. Recording incidents and storing records

For the person who raises the concern - use a safeguarding reporting form to record any known details of the vulnerable people involved e.g. name, address, date of birth etc. All records should be factual and non-judgemental. Always sign, clearly detail name and job role of the person making the record, date and time these records.

For the safeguarding lead and/or deputy, it is equally important to record the reasons for making the decision not to refer to social care services as when the decision is taken to refer.

Normally these records will be passed to social care services or the police as soon as possible. All records will be handwritten by the person with the concern within 24 hours, on a safeguarding reporting form. If this form cannot be handed to the lead or deputy safeguarding officer within those first 24 hours then the lead or deputy safeguarding officer must be informed of the incident/concern over the phone and they will record it.

All records will be securely kept in a restricted access folder. Only the lead and/or deputy safeguarding officers will have access and records will only be kept as long as necessary.

There will be a periodic/monthly senior leadership review of incidences and actions to monitor and continuously train for appropriate handling of safeguarding concerns.

11. SAFEcic Recommendations

In order to attain and retain our SAFEcic award everybody needs to be vigilant in adhering to this policy and also assessing the risks of their own work and activities. These risk assessments will be carried out annually by the lead and/or deputy for safeguarding, however it is the responsibility of everyone to draw attention to practices and procedures that they are unhappy or uncomfortable with.


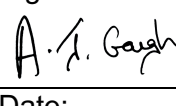
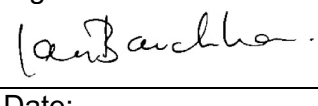
It is only through adopting SAFEcic policies and practices that we can all be confident we have done everything we can to safeguard the vulnerable people we work with.



12. Policy Date

This policy was agreed and disseminated as of 6 June 2023 and will be reviewed annually or when there are substantial organisational changes.

Policy Review Date: June 2024

Signed:

Lead Safeguarding Officer	Deputy Safeguarding Officer	Deputy Safeguarding Officer	Strategic Lead for Safeguarding
Name: James Ayando	Name: Edith Anoku	Name: Abigail Gough	Name: Ian Bauckham
Signature: 	Signature: 	Signature: 	Signature: 
Date: 8th June 2023	Date: 8th June 2023	Date: 13th June 2023	Date: 6 June 2023

Chief Executive Officer	Chair of Trustees
Name: Susan Place Everhart	Name: Iain Walker
Signature: 	Signature: 
Date: 6 June 2023	Date: 23 June 2023

A separate record for staff signatures is maintained to evidence they have seen and understand this policy.