



Humans for Rights Network – Safeguarding Policy

Purpose

The purpose of this policy is to protect people, particularly children, vulnerable adults, and **service users**, from any harm that may be caused due to their coming in contact with Humans for Rights Network (hereafter 'HfRN', 'we', 'us'). This includes harm arising from:

- The conduct of staff or personnel associated with **HfRN**.
- The design and implementation of **HfRN**'s programmes and activities.

The policy lays out the commitments made by **HfRN**, and informs staff and associated personnel of their responsibilities in relation to safeguarding.

The policy does not cover:

- Safeguarding concerns in the wider community not perpetrated by **HfRN** or associated personnel. Though **HfRN** will not be made responsible for safeguarding concerns in the wider community not perpetrated by **HfRN** staff or associated personnel, **HfRN** commits to protecting its service users from harm, which may include supporting individuals to the best of **HfRN**'s ability when such cases arise.

HfRN Mission Statement

- For humans, regardless of their nationality, status, or migration journey, to be empowered to make informed decisions to mitigate the risk and harm they are exposed to by closed border regimes.
- For humans to have the means to bear witness when their rights are abused and for those voices to be amplified.
- For a UK that provides a lawful, compassionate asylum and immigration system rooted in care & respect for people forced to migrate.

The scope of **HfRN** is threefold. **HfRN**:

1. **Complex casework** - We provide high quality investigative casework across the UK to those groups of people who are placed in the most significant areas of risk and peril by UK Asylum & Migration systems. Working with the humans impacted by the traumatic & damaging asylum & protection system in the UK through the provision of agile investigative casework, seeking a solution for the individual whilst driving for changes to the systems & structures that damage.
2. **Witness network and survivor empowerment** - we ensure that survivors of violence & brutality inflicted by borders and anti-migrant policies have their experiences and voices heard. Through the building of a witness network within migrant communities. We will work with those subjected to hostile border regimes directly to provide training and resources enabling, empowering and protecting them to gather evidence and expose systemic harms.
3. **Advocacy and systems change including litigation** – Our advocacy and litigation is directly informed by our casework. Using the Lived Experience of the humans we work with, HfRN will advance the position of change for all those who migrate to the UK to have their human rights upheld through amplifying their voices and experiences.

What is safeguarding? Definitions and context

Safeguarding is defined as “taking all reasonable steps to prevent harm, exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that

harm; and to respond appropriately when harm does occur". In the context of **HfRN**, we often use this to apply to the safety and welfare of refugees, asylum seekers and migrants in Europe.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise.

Those most at risk of experiencing harm include, a:

- **Vulnerable adult:** any person over the age of 18 who is or may be in need of care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- **Child:** any person below the age of 18, as per the United Nations Convention on the Rights of the Child.

HfRN's target service users are displaced people (see definition in *Glossary*). In the context that **HfRN** operates in, all service users are considered vulnerable to a greater or lesser degree. Individuals and groups that **HfRN** seeks to assist are at risk of harm or exploitation due to several factors, including i) a lack of stable and decent living conditions, ii) a lack of access to adequate healthcare and sanitation facilities, iii) a lack of access to legal rights, information and support, and iv) a lack of safety and security, and frequent exposure to violence.

In the context of refugee camps, informal settlements, and detention centres, most adults and children suffer from poor mental health, and in many cases, poor physical health. **HfRN's** service users are also at risk of exploitation from smugglers and people traffickers. Furthermore, the majority of **HfRN's** service users are living in abject poverty and may be i) travelling alone, without meaningful support networks, or ii) caring for multiple dependents.

Additional definitions are available in '**Glossary**' section below.

Scope

This policy applies equally to:

- All staff and volunteers contracted by **HfRN**, and the **HfRN** Board
- Associated personnel engaged with work related to **HfRN**, including but not limited to: staff and volunteers of partner organisations who have received **HfRN** training.
- Anybody visiting **HfRN** programmes and activities, including but not limited to: auditors, trainers, consultants; volunteers; contractors; staff relatives, researchers and politicians.

Review and approval

This policy will be reviewed, approved and endorsed by Madeleine Harris (Founder), and again when there are changes in applicable legislation and/or regulatory guidance.

This document will also be reviewed by Madeleine Harries (Founder) after any safeguarding incident is reported and/or investigated.

Policy statement

HfRN believes that everyone, regardless of age, gender, sexual orientation, disability, ethnic origin, belief system, language or legal status has the right to be protected from all forms of harm, abuse, neglect and exploitation. **HfRN** believes everyone should have access to their rights, without fear of further harm or abuse.

HFRN commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response. This policy ensures that all **HFRN** staff and associated personnel protect the people who receive our services.

This policy has been drawn up on the basis of the law and guidance to protect vulnerable adults, as contained within:

- The Human Rights Act 1998
- Public Interest disclosures Act 1998
- Freedom of Information Act 2000
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Deprivation of Liberty Safeguards, Code of Practice 2008
- Care Act 2014
- Data Protection Act 2018

HFRN's responsibilities

HfRN will:

- Commit to treating all displaced people with respect and dignity.
- Provide a safe and trusted environment which safeguards anyone who comes into contact with **HfRN** including staff and volunteers, service users, partner organisations and other associated personnel.
- Ensure all staff and volunteers have access to, are familiar with, and know their responsibilities within this policy.
- Ensure staff and volunteers receive training on safeguarding at a level commensurate with their role in the organisation.
- Set an organisational culture that prioritises safeguarding, so that it is safe for those affected to come forward and report incidents and concerns with the assurance they will be handled sensitively and properly.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with **HfRN**. This includes the way in which information about individuals in our programmes is gathered and communicated (See our 'Data Policy').
- Where applicable, adhere to best practice protocols established by leading human rights organisations including Human Rights Watch and the UN High Commissioner for Refugees.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and volunteers.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Charity Commission.

HfRN takes as guiding principles, those outlined in the Care Act 2014:

1. empowerment - presumption of person led decisions and informed consent.
2. prevention - it is better to take action before harm occurs.
3. proportionality - proportionate and least intrusive response appropriate to the risk presented.
4. protection - support and representation for those in greatest need.

5. partnerships - local solutions through services working with their communities.
6. accountability - accountability and transparency in delivering safeguarding

HfRN staff and volunteer responsibilities

Child safeguarding

Child safeguarding is expanded on in the complementary **HfRN** Child safeguarding and protection policy

Adult safeguarding

HfRN staff and volunteers are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Safeguarding Policy.
- Conduct themselves in line with **HfRN's** values and commitment to safeguarding vulnerable displaced people.
- Report any concerns or suspicions regarding safeguarding violations by a **HfRN** staff member or volunteer to the appropriate staff member, according to the procedure outlined in this document.

HfRN's staff and volunteers must not:

- Subject an at risk adult to physical, emotional or psychological abuse, or neglect;
- Sexually abuse or exploit at risk adults;

Protection for sexual exploitation and abuse

HfRN staff, volunteers and associated personnel must not:

- Engage in any sexual activity that is not consensual or in any way unlawful.
- Exchange money, employment, goods, services or any form of assistance for sexual activity.
- Engage in any sexual relationships with service users, since they are based on inherently unequal power dynamics.

Safeguarding practices

Safe recruitment practices

HfRN is fully committed to safe recruitment selection and vetting of new trustees, staff and volunteers. We have adopted the following safe recruitment practices:

- Those responsible for recruitment and selection are properly oriented on **HfRN's** Safeguarding Policy and procedures;
- All vacancy announcements will affirm **HfRN's** commitment to our Code of Conduct and Safeguarding Policy;
- Successful candidates will be required to provide proof of identity (passport, ID card) as well as satisfactory character references;
- Successful candidates will be required to provide a valid Disclosure and Barring Service check from a previous role or privately acquired;
- All new staff and volunteers receive comprehensive orientation on the Safeguarding Policy and procedures and associated documents;

- All new staff and volunteers are required to sign and abide by the Code of Conduct as a condition of employment or involvement in **HfRN** activities;
- All new recruits will be provided with digital copies of the Safeguarding Policy and associated documents;

Recruitment of trustees will be undertaken in accordance with applicable guidance from relevant local regulators. In England and Wales, this includes guidance issued by the Charity Commission for England and Wales.

Safeguarding in fieldwork

HfRN staff and volunteers may undertake activities that involve direct access to vulnerable adults and children. In order to engage in fieldwork of this kind:

- Staff and volunteers will receive field training tailored to the local context in which they will work. The training will cover:
 - Recognising and preventing abuse;
 - Emergency response protocols (adapted to the local context and services available);
 - Receiving disclosures;
 - Making reports;
 - Safeguarding their own mental health and wellbeing.
- In order to carry out fieldwork, staff and volunteers must demonstrate a thorough understanding of **HfRN** safeguarding policies and protocols.
- Staff and volunteers will receive the context-specific risk assessment prior to their first field visit. Staff and volunteers must sign and return the risk assessment to the appropriate **HfRN** staff member (e.g. field coordinator) as a declaration of understanding and consent to carrying out specific field work.
- Where possible, staff and volunteers should work in groups of two or more. All new **HfRN** members with little field experience must always be accompanied by a more experienced team member.
- **HfRN** will communicate with staff and volunteers on a regular basis to monitor wellbeing and provide psychosocial support. Staff and volunteers are encouraged to be conscious of own wellbeing and communicate any difficulties and/or mental health issues with an appropriate member of staff.
- Associated personnel visiting the field during **HfRN** activities must be under constant supervision of at least one **HfRN** staff member or equally capable volunteer.

Using photographic/filming equipment

Using photographic and/or filming equipment whilst involved in **HfRN** activities or on the field is not permitted except for very specific cases authorised by senior members of **HfRN** and in which full and informed consent has been obtained from all those present.

In such event that the use of photographic and filming equipment is permitted, service users and the vulnerable individuals that **HfRN** works with should never be identifiable in audio-visual outputs. Senior members of **HfRN** staff must examine and authorise the use of all audio-visual content obtained as part of or whilst associated with **HfRN**. This should include ensuring that all the necessary measures to anonymise the content have been taken, such as face blurring, vocal distortion, etc.

Any audio-visual content that may be used to identify individuals or groups cannot be used publicly. A breach of these guideline by **HfRN** staff or volunteers will lead to immediately disciplinary action and even dismissal.

Safeguarding within partner organisations

HfRN trains grassroots groups and organisations working with children and vulnerable adults to document human rights violations according to the **HfRN** framework.

Before collaborating with a group or organisation, **HfRN** commits to:

- Examining the group or organisation's activities, governance structures and safeguarding policies to ensure these are in line with **HfRN**'s own policies, standards and values.
- Sharing **HfRN**'s Safeguarding Policy and associated documents for inspection by the governing board of the group or organisation.

Groups and organisations who we collaborate with must:

- Design and carry out activities in a way that protects people from harm or exploitation as a result of their involvement.
- Demonstrate a strong commitment to the safeguarding of vulnerable adults and children.
- Have robust safeguarding procedures in place, with reporting and response protocols appropriate for the type of activities they carry out and relevant to their local context, laws and regulations.
- Sign a **Memorandum of Understanding** which sets out mutual commitment and approach to safeguarding.
- Commit to notifying **HfRN** of any safeguarding concerns or incidents that occur within the group or organisation, whereby **HfRN** will re-evaluate its collaboration.

HfRN training sessions

HfRN training for staff and volunteers of partner groups and organisations focus on documenting human rights violations witnessed by the staff and volunteers themselves, and documenting disclosures by witnesses or survivors of abuse. Keeping with **HfRN**'s commitment to safeguarding, the training covers:

- Recognising and preventing harm and abuse;
- Good practice in receiving disclosures and taking testimony;
- Data gathering and protection protocol;
- Safeguarding of one's own wellbeing, mental health and self-care.

Participants of **HfRN** training are reminded to review their group or organisation's own safeguarding policies for information on how to address safeguarding issues that may arise during their work.

Communicating HfRN's Safeguarding policy and procedures

This policy and associated procedures are publicly available on **HfRN**'s website. **HfRN** will communicate them to staff, associated personnel, service users, donors, other stakeholders and the general public as appropriate.

Understanding and recognising abuse

Following guidelines published by the Social Care Institute for Excellence (SCIE), **HfRN** recognises that types of abuse include:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

Information on understanding and recognising abuse and neglect is provided to **HfRN** staff and volunteers during induction and training. **HfRN** will also ensure that staff and volunteers are provided with access to all the resources used by **HfRN** on abuse and neglect.

The full SCIE guidelines including signs of abuse are available here: [Safeguarding adults: types and indicators of abuse](#). SCIE also provide specific guidance on [self-neglect](#).

Reporting procedures

HfRN will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and those we come in to contact with. To enable this, **HfRN's** appointed Designated Safeguarding Officer is responsible for:

- Ensuring that safeguarding is given high priority within **HfRN**;
- Providing support and advice to **HfRN** staff and volunteers on all safeguarding matters;
- Ensuring all safeguarding reports are dealt with in a timely manner;
- Liaising with the relevant authorities where sexual exploitation or abuse; abuse of a child; or abuse of a vulnerable adult is reported or suspected;
- Maintaining an overview of safeguarding issues and monitoring the implementation of the safeguarding policy and procedures throughout INSO;
- Continuous development of a robust and compliant safeguarding policy for **HfRN**.

Any staff reporting concerns or complaints will be protected by **HfRN's** Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

Receiving a disclosure or report

- 1) Reports can reach the organisation through various routes including:
 - Formal reports via a letter, e-mail, text or message on social media.
 - Informal reports as part of a conversation, discussion or rumour. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the appropriate staff member in their organisation.

HfRN accepts complaints from external sources such as members of the public, partners and official bodies.

- 2) If a safeguarding concern is disclosed directly to a member of **HfRN**, the person receiving the report should follow disclosure good practice procedures:

Receiving a disclosure	
DO'S	DON'TS
Listen and be patient	Pressure the person disclosing into speaking

Empathise with the person	Appear cynical or judgmental
Ask who, when, where, what	Ask why
Repeat/ check your understanding of the situation	Fill in the gaps yourself/Assume details
Report to the appropriate HfRN member (see below) as soon as possible	Delay in making an official report

3) The person receiving the report should then document the following information, using the **HfRN Incident Report** Form, including:

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Dates(s), times(s) and location(s) of incident

How to report a safeguarding concern

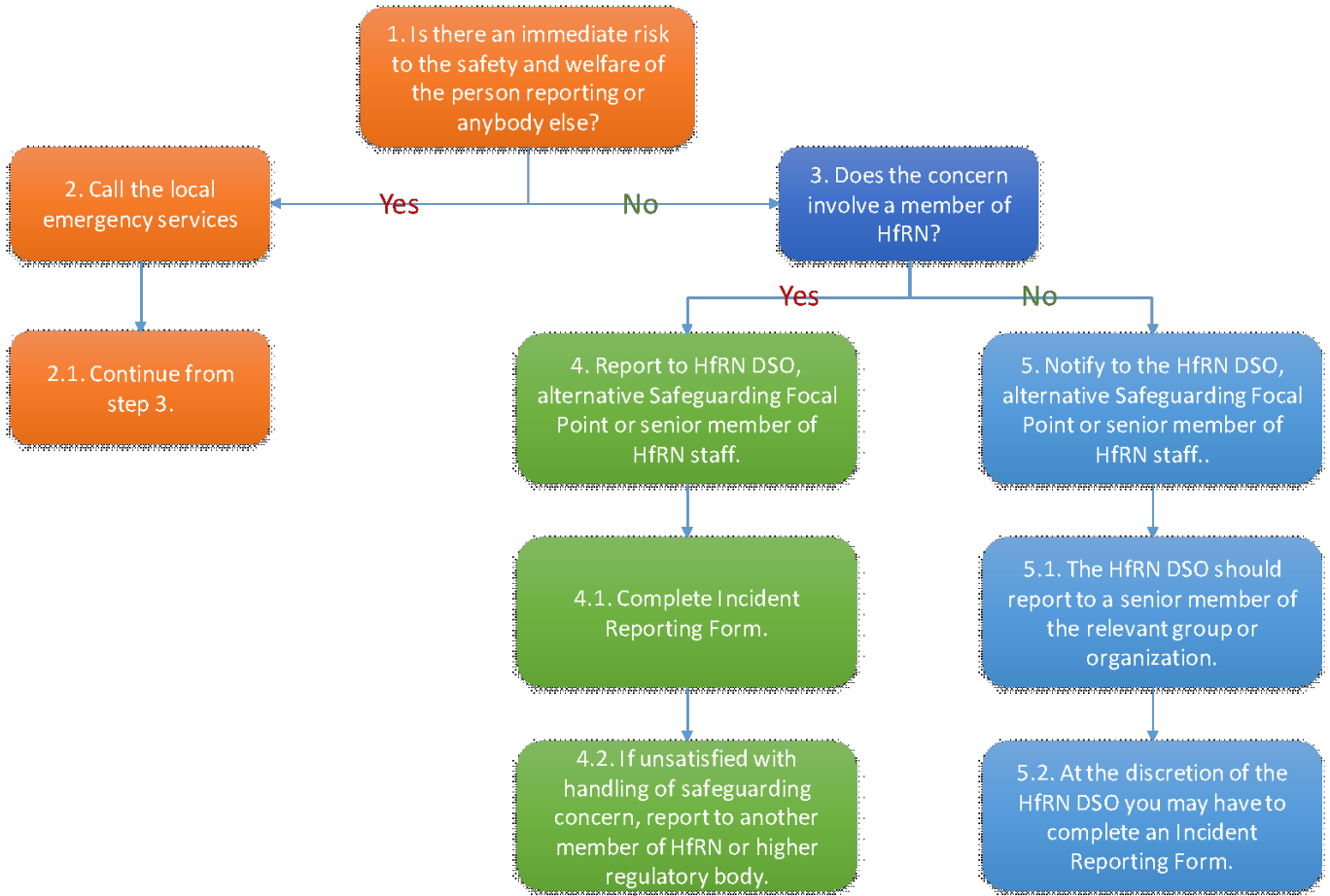
4) **HfRN** members who have a safeguarding concern should report it immediately to the DSO (contact details provided below). Disclosures from survivors should be reported urgently; if reporting is not possible face-to-face, this should be done via call or e-mail.

Note: If the person reporting does not feel comfortable doing so to DSO (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to the additional Safeguarding Focal Point (contact details available below) or any other senior **HfRN** staff member.

5) Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.

6) If the person reporting the safeguarding concern is not satisfied that **HfRN** is appropriately addressing the report, they have a right to escalate the report to the Board of Trustees or to an appropriate external statutory body such as the Charity Commission. The staff member will be protected against any negative repercussions as a result of this report.

7) The **HfRN** member receiving the report must complete an Incident Reporting Form immediately. This document should be updated throughout the handling of the safeguarding concern and archived upon completion of the response.



Reporting Flowchart

Safeguarding contact details

These details will be made available to all staff, trustees and volunteers at the recruitment stage, and during induction. They are also available on the **HfRN** website.

Designated Safeguarding Officer (for all concerns):

Maddie Harris (Founder)
 Tel. No.: +447967357723
 E-mail: Maddie@humansforrightsnetwork.com

Alternative Safeguarding Focal Point:

Juliet Kilpin – board member
 +44 7780 690536
Juliet@peacefulborders.org

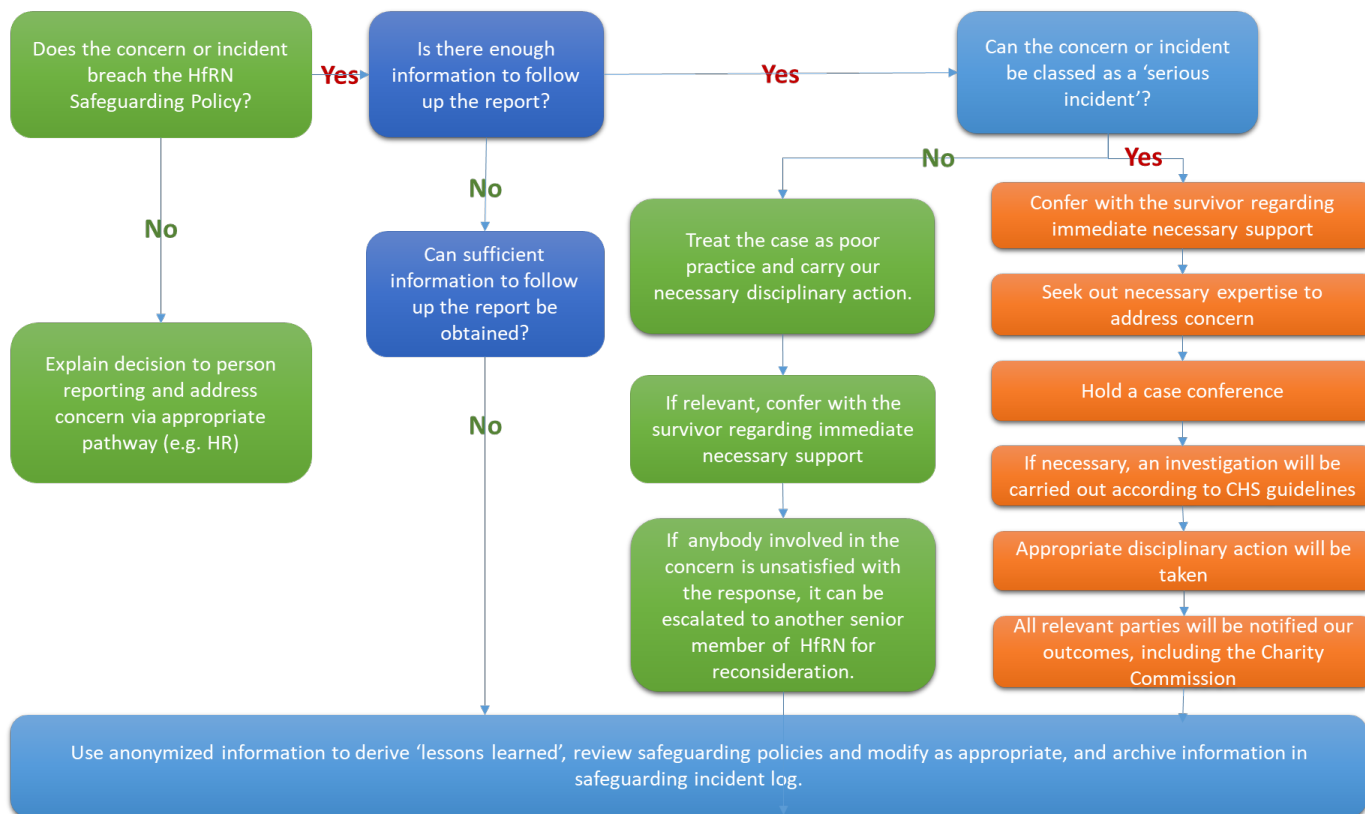
Response

HfRN will follow up safeguarding reports and concerns according to our **Dealing with safeguarding reports policy** and procedures.

HfRN will apply appropriate disciplinary measures to staff found in breach of policy.

HfRN will offer support to survivors of harm caused by staff, volunteers or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

The flowchart below details the basic HfRN safeguarding response protocol to be followed by the Decision Maker assigned to deal with the safeguarding incident or concern.



What constitutes a 'serious incident'?

The Charity Commission defines a 'serious incident' as *"an adverse event, whether actual or alleged, which results in or risks significant:*

- *harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work (who are collectively referred to throughout this guidance as people who come into contact with your charity through its work);*
- *loss of your charity's money or assets;*
- *damage to your charity's property;*
- *harm to your charity's work or reputation.*

For the purposes of this guidance, "significant" means significant in the context of your charity, taking account of its staff, operations, finances and/or reputation".

As HfRN, we consider 'significant harm' to include any treatment that can lead to physical, psychological, emotional social and/or developmental impairment. Such treatment includes but is not exclusive to sexual harassment and abuse, neglect, physical, psychological and/or emotional abuse.

Confidentiality

Confidentiality must be maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

Any immediate concerns relating to the safety and welfare of any person or group involved in the safeguarding concern will be referred to the relevant organisation and/or authority.

Safeguarding incident log

All safeguarding reports made and documented in an Incident Report Form will be securely stored in the Safeguarding Incident Log. The Safeguarding Incident Log is a secure drive that only the DSO and Alternative Safeguarding Focal Point will have access to. Data on the Safeguarding Incident Log is handled and protected according to the **HfRN Data Policy**.

The Safeguarding Incident Log can be accessed in cases where an incident is reviewed or reopened, or to extract 'lessons learned' for the improvement of **HfRN's** safeguarding policy and procedures.

Associated Policies

Glossary

In the context of **HfRN's** work, relevant definitions include:

Displaced person: Any individual, regardless of their legal status, who, for a variety of reasons, has left their home country. This umbrella term includes:

- **Refugee:**
- **Asylum seeker:**
- **Migrant**

Service user: any displaced person who uses **HfRN's** services to report a human rights violation, perpetrated on themselves or somebody else.

Survivor: person who has been subjected to abuse, neglect or any form of conduct in breach of the **HfRN Safeguarding Policy**.

Staff or volunteers: individuals directly contracted with **HfRN** in a paid or unpaid capacity, respectively.

Associated personnel: anybody involved in **HfRN's** activities including but is not limited to partner organisations, their staff and volunteers, consultants, contractors, programme visitors including journalists celebrities and politicians.

Subject of concern: person alleged to have committed a breach of the **HfRN Safeguarding Policy**.