Consider, Create, Refine:
A Roadmap for Developing
Written Safeguarding Policy

Presented by

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In partnership with FADICA

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What is safeguarding?

Safeguarding refers to **measures** and **interventions** that protect people from abuse, harm, exploitation, or violence.

Safeguarding reflects a commitment to **best practices** that **prevent abuse**, **reduce risk,** and **keep all persons**—especially children and vulnerable adults—**safe**.

Safeguarding also promotes action that **assures justice** and **supports healing** for victims and survivors of abuse.

You may be more familiar with terms like safe environment, risk management, or abuse prevention —all important aspects of safeguarding.

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Organizational safeguarding includes having a written safeguarding policy, Code of Conduct, and supporting guidance in place as part of "best practices."

A written safeguarding policy should guide you in answering the question: **What do we need to do to keep people safe at our organization?**

Guidance and program expectations should be shared with **all stakeholders**, including staff, volunteers, Board members, program participants, and beneficiaries of service.

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- Infants, children, and youth
- Elderly or geriatric
- Intellectual or developmental disabilities
- Physical disabilities
- Mental health challenges
- Unhoused or experiencing homelessness
- Formerly incarcerated
- Undocumented immigrants
- Refugees and asylum seekers
- Survivors of trafficking
- Substance use addiction or recovery
- Healthcare patients

"Vulnerable Populations"

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Physical
Sexual
Verbal/Emotional
Mental/Psychological
Exploitation
Neglect
Financial/Economic
Spiritual
Cultural/Identity

Types of Abuse

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Important Risks to Safeguard Against

Adult-to-Client

Abuse

Client-to-Client

False Allegations

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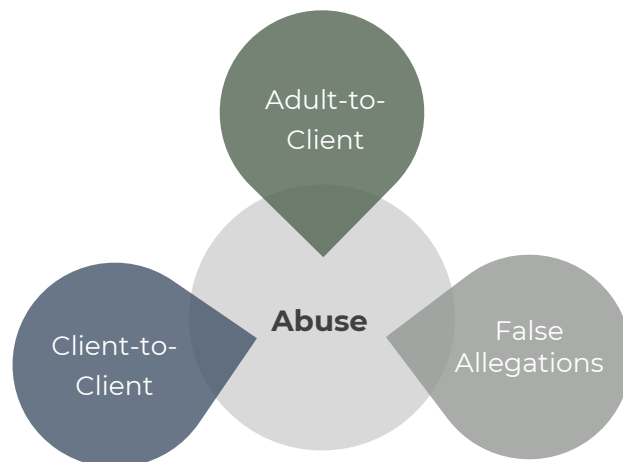
A LANDSCAPE OF INCREASING EXPECTATIONS

- **Increased regulation and oversight** designed to strengthen abuse prevention measures on a broader scale

- **Expansion of minimum expectations**, some at a national level

- More stakeholders are **demanding more efforts** and **asking more questions**:
  - Families
  - Legislators
  - Foundations, funders, donors
  - Insurance carriers and brokers
  - Local, state, national investigators

- Established industries are asking new questions

- More people are being **held accountable**:
  - Organizational leadership
  - Boards of Directors

- The sands are shifting:
  - Identifying who is responsible for protection efforts
  - **Hardening insurance market** for sexual abuse and molestation coverage
  - Expanding **statutes of limitations**

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Safeguarding Policy Framework:
Key Components

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Safeguarding Policy: Decision Points

- ✓ Scope of the Safeguarding Policy
- ✓ Code of Conduct / Boundary Guidelines
- ✓ Screening and Hiring
- ✓ Onboarding and Training
- ✓ Supervision and Support
- ✓ Responding and Reporting
- ✓ Governance and Accountability

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Existing Items to Reference or Incorporate into Safeguarding Policy

Employee Manual or Handbook
Company mission statement
Code of Conduct
Antidiscrimination and antiharassment policies
Human Resources hiring checklist
Grievance procedure
Whistleblower protections
Progressive disciplinary processes
Governance charter
Performance evaluations
Monitoring checklists
Incident report process

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Policy Structure Considerations

Organization-level policies
Define minimum expectations that apply to everyone

- ✔ Zero tolerance
- ✔ Screening
- ✔ Training
- ✔ Response protocols

Program-specific policies
- ✔ Boundaries
- ✔ High-risk activities
- ✔ Monitoring and supervision

|		
Policies	Screening & Selection	Training
Monitoring & Supervision	Internal Feedback Systems	Consumer Participation
Responding	Administrative Practices	A SAFE ENVIRONMENT

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Safeguarding Policy – Component 1

Introduction to the Organization's Purpose and Mission / Zero Tolerance for Abuse / Organizational Culture

- Describe <u>why</u> the organization is committed to preventing and responding appropriately to any harm against vulnerable individuals (children & adults)
- Describe how safeguarding efforts promote and sustain the organization's mission and values
- Outline the organization's zero tolerance for abuse

WHY
HOW
WHAT
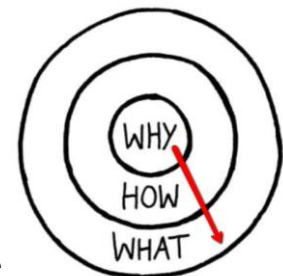
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<u>Safeguarding Policy – Component 2</u>

Behavioral Expectations and Interactions with Vulnerable Clients

- Describe defined expectations for safely and appropriately interacting with vulnerable clients
- Include the organization's Code of Conduct
- Outline both appropriate and inappropriate interactions to define the bandwidth of acceptable behavior

Boundaries to Define

- Physical affection

- Verbal interactions

- Electronic communication

- Contact outside of regular program activities

- One-on-one interactions

- Gift giving and receiving

ACCEPTABLE

Create Institutional Memory

- The safety of clients should depend on **standardized** policies and procedures and an **institutional culture** – **not personnel**.

- Employees and volunteers **come and go**. You need the **same** level of policy adherence and understanding regardless of individuals on the team.
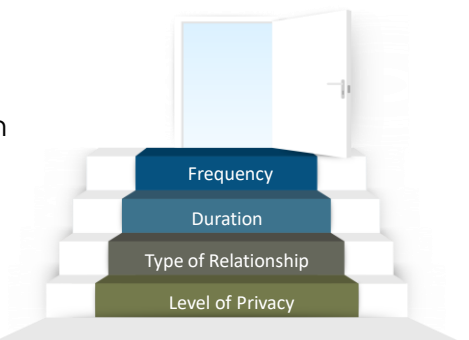

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Safeguarding Policy – Component 3

Screening and Hiring Processes

- Describe the comprehensive and standardized process for screening and hiring individuals who will have access to vulnerable clients
- Identify whether process changes based on the position's level of access to vulnerable clients
- Identify whether and to what extent applications, interviews, reference checks, and criminal background checks are conducted and reviewed through an abuse prevention lens

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Safeguarding Policy – Component 4

Onboarding and Training Requirements

- Describe onboarding and training requirements to equip staff with abuse prevention and safeguarding knowledge and skills
  - Content might include discussions on organization's zero tolerance for abuse, maintaining appropriate boundaries with clients, identifying and managing high-risk interactions and activities, internal and external responding and reporting procedures
  - Describe frequency (initial onboarding, annual, monthly staff meetings) and delivery systems (formal orientation, in-person discussion, online modules, group/team meetings) in which information and training will be delivered
- Identify whether requirements change based on the role/position's level of access to vulnerable clients
- Describe how the organization will maintain and verify compliance with defined training requirements

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TRAINING REPETITION

Graph from
https://elearningindustry.co
m/forgetting-curve-combat
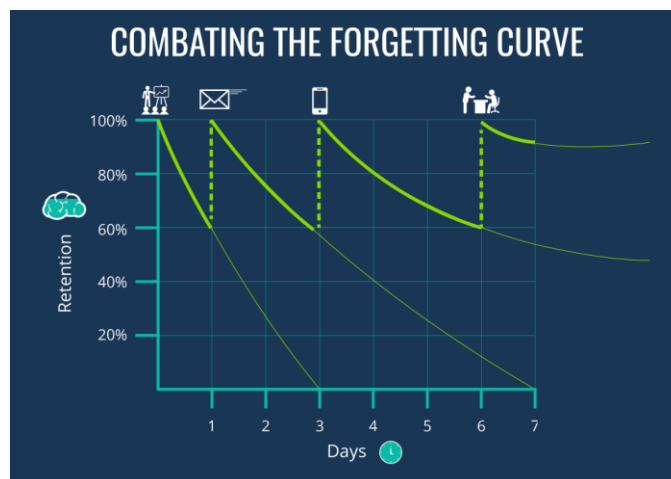
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Safeguarding Policy – Component 5

Supervision and Support
- Describe the variety of ways in which the organization monitors and supervises:
  - Staff (employees and volunteers)
  - Vulnerable clients (peer interactions)
  - High-risk activities (overnight/residential, transportation, one-on-one interactions, etc.)
  - High-risk locations and architectural risks (bathrooms, bedrooms, isolated areas, etc.)
- Describe how the organization intervenes and supports staff and clients (i.e., supervision meetings, performance evaluations, progressive discipline process, implementation of safety or supervision plans)

Safeguarding Policy – Component 6

Systems for Responding and Reporting
- Define the organization's internal response procedures for:
  - Red flag behaviors, low-level concerns, and policy violations
  - Suspicions or allegations of abuse
  - Client to client inappropriate behaviors
- Describe procedure for conducting internal investigations or incident reviews
- Describe how the organization seeks to minimize or remove barriers to reporting concerns or incidents
- Identify mechanisms for supporting victim-survivors

International Experiences

- Level of enforcement and compliance
- Third party vs. victim report
- Varied trust in civil authorities
- Country's political state or situation
- Statutes of Limitation
- Response time

International Recommendations

- Learn the requirements specific to your jurisdiction
- Educate those who work with you and make the information easily accessible
- Create relationships with civil authorities and entities you trust
- Consult with your legal counsel
- Even if not required, consider reporting to the civil authorities

Safeguarding Policy – Component 7

Governance Involvement and Accountability

- Describe how the organization's governing body is involved in supporting and enforcing the safeguarding policy and its initiatives for keeping staff and clients safe:
  - Identify when and under what circumstances the governing body is to be notified of concerns/incidents
  - Outline what kind of trending information is regularly presented to the governing body
  - Define how often the governing body reviews and gives feedback on program development, quality improvement, and leadership of safeguarding efforts
  - Explore how the safeguarding policy and its initiative overlay with external partners and third-party relationships

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A Path Forward in Safeguarding

Voice from the Top

Clear Standards of Protection and Behavior

Provision of Abuse Prevention Resources

Integrate Accountability Systems

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Voice at the Top

- ✓ Leadership needs to be committed and vocal

- ✓ Prevention is not one individual's or organization's role

- ✓ Fulfill the organization's mission

- ✓ Effective stewardship of resources

- ✓ Influential voice to community stakeholders

- ✓ Torchbearers among other organizations

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Stewarding Safeguarding
Reflection Points for Faith and Values-informed
Organizations and their Leadership Teams

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GOOD STEWARDSHIP

Some questions to consider as an **employee** or **high-access volunteer**

- How frequently have I participated in training on **professional boundaries**, **abuse prevention**, and **mandated reporting**? Do I retain that information well? Do I feel supported by my team to **proactively act** and **err** on the side of safety?

- What **written guidelines** and **behavioral expectations** are articulated in the employee handbook, and how frequently are these topics revisited in **all-team meetings**? When was the policy/handbook last reviewed or updated?

- Does the organization **publicly acknowledge its commitment** to preventing abuse and responding to **all** allegations? What values statement and supporting information (policy, handbook, etc.) is publicly available on the website and provided through staff orientation?

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GOOD STEWARDSHIP

Some questions to consider as an **employee** or **high-access volunteer** (continued)

- Does the organization have gaps where "word of mouth" process (i.e., "This is how it's always been done") **deviates from** or **effectively replaces** written process? Are there procedures that only live in memory or practice that have not been formalized into procedure?

- If I have a concern as a staff member or high-access volunteer, **to whom do I report** (internally/externally)? Is there a mechanism for **anonymous reporting**?

- How does the organization **communicate with** and **inform** staff, clients, and the community in the wake of abuse allegations (including historical allegations)? What additional support and training is provided?

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GOOD STEWARDSHIP

Some questions to consider as a **client** or **stakeholder**

- How does the organization **screen its employees and high-access volunteers** (i.e., application, interviews, reference checks, criminal background checks, etc.)?

- What are the **minimum training requirements** for staff/high-access volunteers on the topics of **professional boundaries**, **abuse prevention**, and **mandated reporting**?

  Consider: Content, frequency of delivery, method of delivery

- Does the organization **publicly acknowledge its commitment** to preventing abuse and responding to **all** allegations? What values statement and supporting information (policy, handbook, etc.) is publicly available on the website, and what is distributed to clients?

- What is the process by which a client or other stakeholder can **make an internal report** to the organization? Who is the primary point of contact?

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GOOD STEWARDSHIP

Some questions to consider as a **client** or **stakeholder** (continued)

- What are the organization's written procedures for **responding to** and **documenting**:
  1. Policy violations?
  2. Inappropriate behaviors?
  3. Incidents or allegations of abuse?

- How does the organization **invite** and **receive feedback** from stakeholders? Are there systems designed to identify trends or patterns of increased risk or safety concerns?

- Is there a governance body or an **accrediting body** to whom the organization reports or to which it is accountable for meeting certain standards?

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Remaining Person-Focused through Collaboration

- Do we feel disengaged from safeguarding and abuse prevention as an organizational priority (perceived burden, media fatigue, burnout)?

- What concrete steps can help our organization or leadership overcome mental roadblocks and operational burden?
  - *Consider short-term vs. long-term needs*

- Are we comfortable communicating with stakeholders, including funders, about areas where our organization feels empowered, challenged, or stuck?

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Continuum of Commitment

Complacency

Compliance

Commitment

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STAY IN TOUCH

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