



A O G
ACTS OF GRATITUDE



THE QUEEN'S
YOUNG LEADERS
AWARD-WINNER 2015

ACTS OF GRATITUDE

AOG

SAFEGUARDING POLICY

Kigali, September 2019

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1. Introduction

Acts Of Gratitude (AOG) is a national nonprofit organization specializing in Social entrepreneurship; we are working to tackle youth unemployment, poverty, inequalities, and other social challenges through social entrepreneurship.

We believe that human life is valuable, and that people are filled with potential. Living a life in freedom and dignity, with respect for each other and the planet, leads to greater individual well-being and fair, vibrant societies; we recognize that sustainable development can only be achieved in any society by combining economic activity with social inclusion.

With this context, we are aware of the vulnerability of many of our beneficiaries and the importance of the behavior of our own staff and our partners. This Safeguarding Policy provides clear definitions, sets standards across the organization, and gives clear guidance on how to apply and implement the policy throughout the organization and in relation to partner organizations.

2. What Is Safeguarding

For Acts Of Gratitude (AOG) safeguarding means promoting and protecting people's health, well-being and human rights, and enabling them to live free of harm, exploitation and abuse. A safeguarding approach means identifying and minimizing the risk of harm to children and (vulnerable) adults such as disabled people from staff, representatives, partners and each other.

In addition to this, safeguarding is increasingly becoming best practice to think about how we safeguard everyone in our organization at all times, including protecting staff from inappropriate behavior such as bullying and harassment.

Safeguarding includes a range of policies, procedures and activities seeking to address the welfare of staff, partner organizations and those we come into contact with such as youth changemakers and (vulnerable) adults. It focuses on developing standards and mitigation measures to target and reduce residual risk.

3. Policy Statement

Acts Of Gratitude (AOG) has a zero tolerance approach to the harm of its staff, volunteers, beneficiaries and other vulnerable adults. Acts Of Gratitude (AOG) recognizes that safeguarding is everyone's responsibility and that it has a responsibility to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of its staff, and the community of changemakers whom we work with, and to protect the communities in which Acts Of Gratitude (AOG) operates in from harm caused by its programs or the Addressees.

Acts Of Gratitude (AOG) believes that everyone has an equal right to protection from abuse and exploitation regardless of age, race, gender, 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.

With this safeguarding policy, Acts Of Gratitude (AOG) has a clear Zero Tolerance on bullying, harassment and sexual exploitation, fraud and abuse of power.

It is stated that: Every employee shall conduct themselves with courtesy, respect and integrity towards all persons in the course of doing their work. No employee may discriminate against any other person. No employee may abuse or deliberately intimidate any other person. No employee may make sexual advances where he/she knows or ought to know that the solicitation is unwelcome or in any other way sexual harass another person. Aggression and violence are not tolerated, AOG staff must avoid actions or behavior with beneficiaries or customers which may constitute poor practice or potentially abusive behavior.

4. Integrity and Confidentiality

Acts Of Gratitude (AOG) is committed to maintaining the confidentiality of personal information that it handles. Any information given or received in confidence for one purpose will not be used for another purpose, or passed to a third party, without the express consent of the individual except in special circumstances e.g. to prevent further harm to an individual.

Acts Of Gratitude aims for highest possible integrity in its contact with partners, suppliers, clients, among AOG staff and in relation to business property. We recognize that integrity cannot be arranged just by drawing up a number of rules of conduct; Attitude and “wanting to do things properly” are also important aspects of integrity.

5. Our Core Values:

- **Freedom & Dignity**

Every human being has the right to live in freedom and dignity. People should have the freedom to believe what they want, voice their opinions, and challenge and influence the established order.

- **Sustainable Use Of Our Planet’s Resources**

We only have one planet. It offers vast riches, but they are not limitless and are already seriously degraded. For current and future generations to be able to prosper, sustainable use of earth’s resources is paramount. This implies moving beyond merely reducing our negative environmental impact by actively restoring what has been degraded and favoring biodiversity.

- **Determination and Diversity**

People should be able to make choices and decisions based on their creativity and innovation preferences and interests. Each individual is unique, and individual differences lead to diversity and colorful societies.

- **Equality and Social Justice**

We are not the same, but we are equal. We should be treated as such, and this should be reflected in the way our social and legal systems work.

- **Responsible Citizenship**

Citizens have rights as well as duties. Taking care of those around us and living life without damaging others or our planet, should be given.

Online Safety and Data Protection

1.1.Guidelines

These guidelines for safety are by no means exhaustive, and should be considered as a tool to help support the implementation and management of online safeguards. If a profile or group is set up by Acts Of Gratitude (AOG), it is essential that a member of staff joins as a moderator to oversee content and activity. The role of the moderator should be to monitor conversations, images and other activity of group members and challenge, educate and intervene as necessary.

Moderators should take responsibility for educating members of the group about online safety, including how to customize privacy settings. Sufficient moderation should be in place to inhibit anyone working on behalf of Acts Of Gratitude (AOG) from having a private conversation with a beneficiaries, customers, suppliers, clients and partners, including the moderator.

This extends to email correspondence, which may mean replacing personal email addresses with a group inbox, and text messages which may require the use of a team phone that multiple staff have access to. In addition, staff should not make use of their personal social media accounts for the purpose of delivering Acts of Gratitude (AOG), In such cases a new account should be opened that enables the staff member to maintain boundaries between their personal and professional lives. Staff must not publish images of people unless consent has been given in writing.

1.2. Safeguarding Media Platforms

Social media evolves rapidly, and in response Acts of Gratitude (AOG) needs to consider the potential risks inherent in new forms of media.

6.3 Media and the Use of Images

All photos taken should respect human dignity and consider the rights, safety and well-being of the person or people being portrayed.

6.4. Minimum Standards

- Comply with local traditions or restrictions when taking photos of people, objects or places.
- Inquire into national laws related to photography and privacy rights.
- Gain verbal or written consent before taking photographs.
- Respect a person's right to refuse to be photographed. If you sense any reluctance or confusion, refrain from taking the photo.
- Do no harm. Individuals or groups may be put at risk of reprisal, violence or rejection in their communities as a result of exposing their identity or personal story through the publication of their image.
- Do not misrepresent the individual, situation or context of the photo.
- Absolutely no payments or any other form of compensation are to be provided to subjects in exchange for their photo or consent.

6.5. Large Crowds

When taking images at an event attended by large crowds, such as a sports event, special dinner, this is regarded as a public area and so permission is not required from everyone in a crowd shot. People in the foreground are also considered to be in a public area.

6.6. Safe Storage of Images

Once a picture has been taken and written consent to use it has been obtained, it is necessary to store the images appropriately. A risk based approach should be adopted to determine what measures are appropriate for the safe internal storage of images.

7.1. Preventing abuse

Acts Of Gratitude (AOG) is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and that all those involved within its programs will be treated with respect. Acts Of Gratitude (AOG) will work within the current legal framework for reporting staff or volunteers that are abusers

7.2. Recognizing the signs and symptoms of abuse

Acts Of Gratitude (AOG) is committed to ensuring that all staff, the management committee, trustees and volunteers undertake training to gain a basic awareness of signs and symptoms of abuse.

Abuse includes:

a) Physical abuse:

Physical abuse is causing deliberate injury to a person, however slight. This may involve hitting, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing or attempting to cause physical harm to a person. Physical harm may also be caused through the misuse of medication, restraint or inappropriate sanctions (for example, corporal punishment) or being given alcohol or a substance that is known to cause harm.

b) Emotional/psychological abuse:

Emotional or psychological abuse is the emotional ill-treatment of a person that adversely affects their wellbeing or development. Some level of emotional abuse is involved in all types of ill treatment, though it may occur alone. It includes threats of harm, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks.

c) Sexual abuse:

Sexual abuse is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, inappropriate sexual contact or exposure to inappropriate material. Any kind of

sexual activity involving a child constitutes sexual abuse, regardless of whether or not the child is aware of, or consents to, what is happening. This includes rape, incest, fondling genitals, masturbation, voyeurism, exhibitionism, exposing a child to adult sexual material, or making them take part in any sexual activity, real or simulated, whether face-to-face, online, or in any other medium.

d) Financial or material abuse:

Financial or material abuse is the theft or misuse of a person's property or assets. This includes money being withdrawn or stolen, goods or services purchased in someone's name without their consent, being deliberately overcharged for goods or services, misappropriation of property, possessions or benefits, or money being borrowed by someone who is providing a service to the vulnerable person.

e) Discriminatory abuse:

Discriminatory abuse is repeated, ongoing or widespread discrimination due to a person's age, sex, gender, disability, racial heritage, religious belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy and maternity. This can include unfair or less favorable treatment, sexual or gender preference, slurs, harassment, name-calling, bullying, cyber bullying, breaches of civil liberties, and unequal access to health or social care.

f) Harmful traditional practices:

Harmful traditional practices are forms of violence which have been committed (primarily against women and girls) in some communities and societies for so long that they are considered, or presented by abusers, as part of accepted practice.

g) Harassment:

Harassment is a behavior that can cause the recipient to be embarrassed, uncomfortable, distress and has the effect of humiliating, intimidating, or coercing someone through personal attack or any behavior that is unwelcome, unwanted, or unsolicited where the recipient regards it as offensive or undesirable. (When a person communicates that the behavior is unwelcome, it

becomes illegal. Even if the conduct is not stated but implied, as long as it is unwelcomed it is unlawful.)

7.3. Reporting and responding to incidents

AOG ensures that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case. AOG representatives are properly informed of the reporting and incident management procedures.

Any AOG representative who has a safeguarding concern must report such concerns to the Designated Safeguarding Lead. **Appendix 1** is a flowchart outlining the procedure. **Appendix 2** shows the initial reporting form to be used.

7.4. Confidentiality

All reports and the information herein will be handled with strictest confidentiality to protect the identity of the individuals concerned, the informer and the accused, both appropriately and in accordance with relevant national legislation. A written record will be made of what information has been shared with whom, and when.

All written records will be stored on secure files in a central place separate from project material. Consequences of harm, exploitation or abuse Any behavior towards children or adults, which results in harm, exploitation or abuse, or the failure to follow the general requirements and specific code of conduct of this policy, is grounds for the following measures:

Representatives

If AOG member or employee has been under investigation by AOG or by official law enforcement authorities for any area of harm, exploitation or abuse as defined under this policy, they will be subject to disciplinary procedures. Under these procedures they may be temporarily suspended during the investigation. If an employee is dismissed for proven harm, exploitation or

abuse, AOG will inform the relevant authorities, disclose this to prospective future employers and/or refuse a reference, depending on the details.

Partner organizations

Appropriate action will be taken up to and including immediate termination of a partnership or service agreement. In this case, the short or long-term impact on beneficiaries of the termination of a partnership will be considered.

8. Working with Partners

It is recognized that there are inconsistencies in the establishment and rigor of safeguarding policies and practice across organizations. This can include variance in safeguarding comprehension, literacy and training. These inconsistencies can be further compounded when operating in different legal, social and cultural contexts.

This disparity can have the potential to threaten the safety of programs, and increase exposure to risk both for Acts Of Gratitude (AOG) and those with whom the organization comes into contact with.

The provision and primacy of safeguarding in a partner organization should be a key determinate factor in the decision to enter into and establish a partnership with other organization or institution will be diligently assessed to ensure the suitability of working in partnership with another organization.

Acts Of Gratitude (AOG) will work to support, as far as is reasonably practicable, partner organizations with a lower degree of safeguarding experience, rigor or protocol to safely and effectively fulfill their organizational responsibilities and deliver on partnership goals.

9. Location/Building

AOG maintains a comprehensive risk register for all sites controlled by AOG which outlines the potential safeguarding risks and mitigating actions and processes which are in place to tackle those risks. This can be found at **Appendix 3**.

10. Target groups of the policy

This Safeguarding Policy is to be applied across all organizational activities and in all of AOG's Communities. All AOG representatives and partner organizations should be aware of and adhere to the policy. AOG representatives are defined as trustees, employees (permanent or temporary), consultants, volunteers who work directly for AOG and donors travelling on AOG business.

In addition to complying with the policy all representatives must sign and will be held accountable to the AOG Safeguarding Code of Conduct. First and foremost, it is expected that partners will have policies and procedures in place covering safeguarding in order for AOG to enter into partnership.

And this will not always be the case as the start of a partnership, particularly with grassroots civil society partners. Where partners do not have appropriate policies, but it is deemed essential that AOG work with them, policies will be developed as part of the early stages of the partnership, led by the due diligence process.

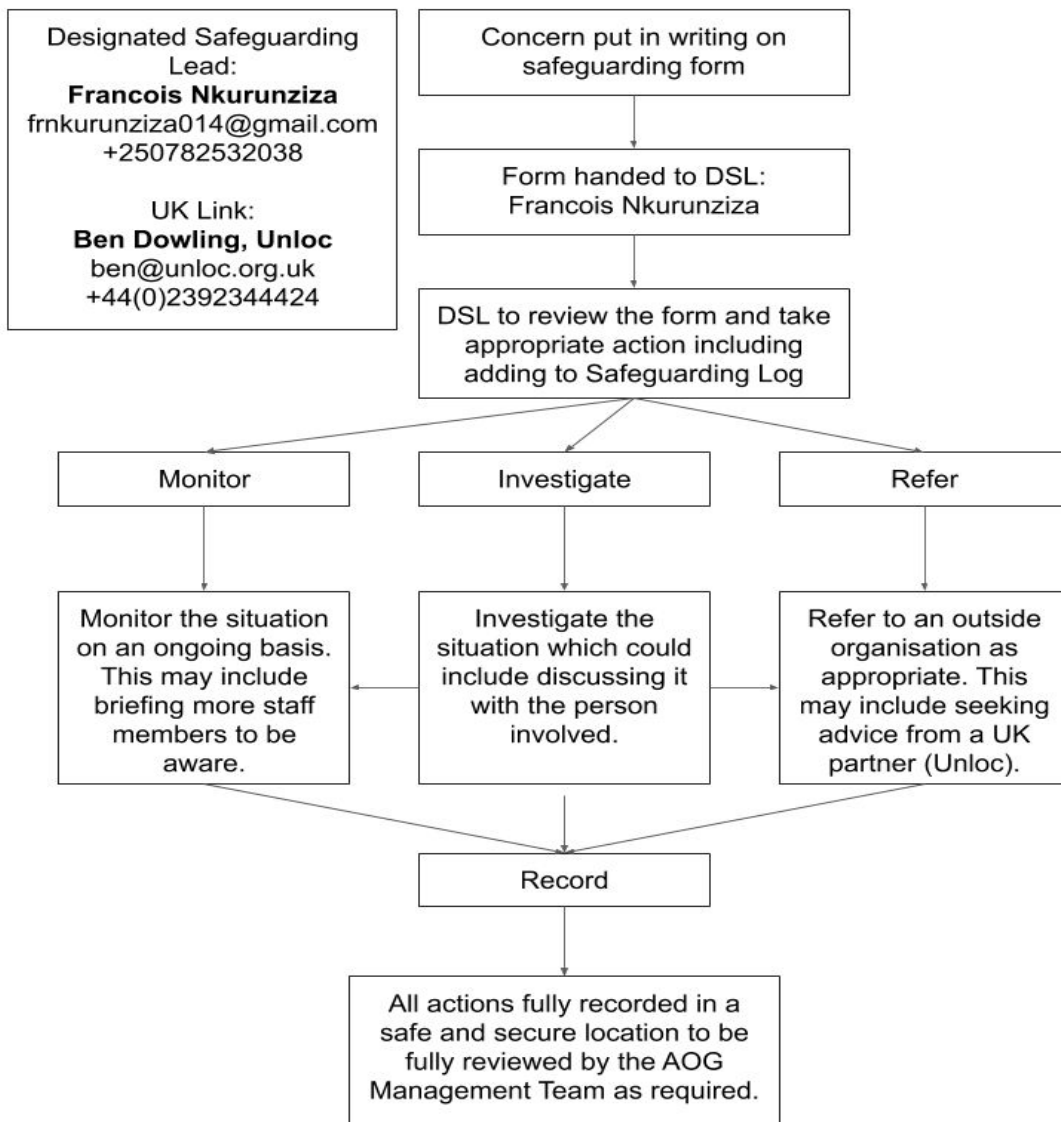
11. Implementing, maintaining and reviewing the policy

AOG will integrate safeguarding measures into relevant core internal processes and tools such as program technical guidelines, partner assessments and agreements, training modules, program design, monitoring and accountability systems and recruitment procedures.

AOG will make sure that proper induction and training in safeguarding will be made available to all staff and AOG members, permanent and temporary, consultants and volunteers. The staff responsible for the implementation of this policy will receive additional training in order to manage their responsibilities for rolling out, managing and coordinating the safeguarding policy and procedures. Where relevant, AOG will support partner organizations by including relevant training and technical advice to build capacity in the field of safeguarding, with a particular focus on children and adults with disabilities. The policy will be monitored on a regular basis by the designated staff.

AoG will ensure that staff involved in facilitation training programmes will start each programme by building a climate for learning that involves engaging participants in the setting of Ground Rules. In this session the core principles of the Safeguarding Policy will be shared. Participants will be engaged in a process that clarifies both the meaning and intention of the Safeguarding Policy. They will be enabled to play a positive role in monitoring and helping take responsibility for delivering the safeguarding protection, to other programme participants and staff that this policy offers..

Appendix 1 - Safeguarding Flowchart



Appendix 2 - Reporting Form

Safeguarding Record

To be completed in all cases in the event of an allegation or complaint or any event which raises a safeguarding concern whereby an official record needs to be kept.

Details will be strictly confidential and only be accessed by necessary persons, including Social Services and/or the police as appropriate.

Name of Person: _____

Telephone: _____ Email: _____

Time & Date of incident (if applicable) _____

Record of who was concerned and what is said to have happened / what was seen and by whom

Description of any physical evidence e.g. bruising, bleeding, changed behaviour

What was said by those involved?

Person's description of what took place (using the words they use)

Who has been notified?

Time and Date?

Have any other partners been advised?

Yes No

Name of person and position recording details:

Signature, Time and Date

Outcome:

Appendix 3 - Risk Register

Risk	Risk Rating (H/M/L)	Identified causes and consequences	Mitigating Actions
<p>Risk Title OH&S</p> <p>Risk short description There is a risk that staff, trainees or visitors on learning sites (or staff, programme participants and accompanying individuals during learning activities) suffer an injury or stress</p>	Medium	<p>Causes</p> <ul style="list-style-type: none"> ● Conflict/bullying/intimidating and/or threatening behaviour or harassment of staff, trainees or visitors and/or accompanying individuals ● Work-related stress ● Slip, trip or fall hazards ● Storage, handling and transport of materials and equipment ● Musculoskeletal injury at work <p>Consequences</p> <ul style="list-style-type: none"> ● Inability to deliver on AOG goals, targets and key improvement strategies ● Potential high staff turnover ● Recruitment and re-training costs ● Staff low morale and motivation ● Increased absenteeism ● Increased workload on other staff ● Loss of corporate knowledge ● Poor public image and negative media 	<ul style="list-style-type: none"> ● Update and review organization website to ensure it reflects our values, attitudes and culture regarding behaviour expectations ● Review and modify storage areas so that frequently accessed or heavy items are stored between shoulder and knee height ● Develop and implement an agreed Performance Development Plan which clearly outlines key accountabilities, activities and behaviours ● Monitor and review this risk as a regular agenda item at AOG management meetings
<p>Risk Title Wellbeing and safety - AOG site</p> <p>Risk short description There is the risk of injury to staff, programme participants, contractors or visitors on the AOG site.</p>	Medium	<ul style="list-style-type: none"> ● Lack of supervision or appropriate / adequate supervision (staff ratios) ● Recklessness / criminal act including sexual assault, drug use / abuse on AOG site e.g. prescription and illegal drugs, alcohol ● Unauthorised person(s) on AOG site e.g. drug dealer, gang member, non-custodial family member ● Trainees violence towards programme participants / staff ● Staff violence towards programme participants / staff ● Visitor violence towards staff / programme participants ● Self-harm ● Disregard / breach of policy and/or procedures ● Accident or misadventure e.g. infectious disease outbreak, electrocution (faulty equipment), chemical spill, gas leak etc. ● Allergic reaction arising from insect bite / sting /food product / chemical contact (anaphylaxis) ● Bullying / discrimination ● Exposure to asbestos ● Injury sustained as a result of Community use of AOG facility after hours (sports injury) ● Pedestrian / traffic accident on AOG site associated with set down / pick up of trainees <p>Consequences</p> <ul style="list-style-type: none"> ● Death, injury or disability ● Workers Compensation / Public Liability claim ● Cost implications (time and money for investigations / reporting / rehabilitation) ● Possible litigation ● Disruption to learning programs ● Stress event requiring professional help ● Inquest / Coroner's Inquiry ● Reputation damage to the AOG 	<ul style="list-style-type: none"> ● Monitor and review this risk as a regular agenda item at AOG management meetings. ● Staff receive training on what to do when worried about these issues.
<p>Risk Title Financial performance</p>	High	<p>Causes</p> <ul style="list-style-type: none"> ● Ineffective budgeting ● Over commitment of funding ● Inaccurate growth predictions 	<ul style="list-style-type: none"> ● Develop financial review strategy - suggest quarterly timeframe and AOG Council sign off

<p>Risk short description There is the risk that organisation's financial performance does not support the AOG's aims and objectives</p>		<ul style="list-style-type: none"> Fundraising activities don't meet target / expectations Theft / loss / fraud <p>Consequences</p> <ul style="list-style-type: none"> Targets and key improvement strategies cannot be delivered Educational outcomes not met Reputation damage 	<ul style="list-style-type: none"> Monitor and review this risk as a regular agenda item at AOG management meetings
<p>Risk Title Infrastructure</p> <p>Risk short description There is the risk that the organisation's infrastructure is not adequate to provide appropriate educational outcomes or does not meet community expectations</p>	Medium	<p>Causes</p> <ul style="list-style-type: none"> Loss or damage due to arson / vandalism / storm damage / natural disaster / Electricity fire Natural growth / strategic planning does not match growth Inadequate maintenance increases vulnerability Recklessness / criminal act <p>Consequences</p> <ul style="list-style-type: none"> Loss of access to facilities until repaired / replaced Requirement to use sub-optimal temporary facilities Improved educational outcomes not achieved Loss of facilities without replacement (if over entitlement) Disruption to learning programs Inconvenience to every day routine Reputation damage for the AOG 	<ul style="list-style-type: none"> Establish liaison with local police, fire, ambulance emergency response personal and develop positive ongoing relationship as preparation for any contact situations Develop funding application strategy to enhance the success of infrastructure funding bids Monitor and review this risk as a regular agenda item at AOG management meetings There is an appointed member of staff in charge of overseeing the AOG offices.
<p>Risk Title Emergency response</p> <p>Risk short description There is the risk of the failure to respond to emergencies adequately / appropriately / promptly</p>		<p>Causes</p> <ul style="list-style-type: none"> Inadequate Emergency Management Plan (EMP) Failure to undertake periodic review or implement lessons learnt from practices / incidence Lack of appropriately skilled / trained staff Failure to practice emergency responses Lack of leadership re emergency management by AoG <p>Consequences</p> <ul style="list-style-type: none"> Injuries to staff and trainees Destruction / damage of facilities Stress event requiring professional help Disruption to learning programs Disruption / inconvenience to every day routine Inquest / Coroner's Inquiry Reputation damage to the AOG 	<ul style="list-style-type: none"> Develop Communications Plan / Strategy and activate / implement depending upon situation Establish liaison with local police, fire, ambulance response personal and develop positive ongoing relationship as preparation for any contact situations Monitor and review this risk as a regular agenda item at AOG management meetings Emergency Response training provided to all staff.
<p>Risk Title Information security / accessibility</p> <p>Risk short description There is the risk of unauthorised access, misuse, modification, alteration, release (leaking) of records (information) including failing to comply with privacy legislation regarding records (information)</p>	Low	<p>Causes</p> <ul style="list-style-type: none"> Inadequate information security systems / guards / classifications Unethical (unlawful) behaviour by staff member / contractor Aggrieved staff member or contractor Accidental release / failure to safeguard / appropriately destroy / deal with records Lack of accessibility and/or ease of accessibility to records (information) <p>Consequences</p> <ul style="list-style-type: none"> Litigation for breach of copyright / privacy Potential consequences under Archives Act Cost involved in restoration of records Possible impact on trainees learning or programme participants' / staff well being Possible civil action (aggrieved party - trainee, tutor) Reputation damage for the organisation 	<ul style="list-style-type: none"> Develop induction pack for new staff Develop information security awareness campaign Monitor and review this risk as a regular agenda item at AOG management meetings AOG uses secure software and hardware provided by reputable sources. All paperwork containing personal details are kept under lock and key.
<p>Risk Title Fraud / corruption risk</p> <p>Risk short description There is the risk of a staff member or contractor acting dishonestly to obtain a benefit</p>	Medium	<p>Causes</p> <ul style="list-style-type: none"> Opportunity combined with a lack of adequate controls Unethical behaviour Wilful non-compliance with policies and procedures including conflict of issues policy Lack of supervision <p>Consequences</p>	<ul style="list-style-type: none"> Develop financial review strategy Monitor and review this risk as a regular agenda item at AOG management meetings

		<ul style="list-style-type: none"> ● Loss of trust impacting ability to achieve outcomes (i.e. inability to raise funds in future) ● Financial loss: monies / asset stolen or overpayment ● Time lost to investigate alleged fraud or corruption matter ● Time lost replacing contractor ● Reputation damage for AOG 	
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The list of risks listed here is not exhaustive, the list will be updated regularly to match the growth of Acts of Gratitude (AOG).