International Protocol for Projects, Research and Partnerships in Low- and Middle-Income Countries

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Objective and Policy Statement

In keeping with its vision and values, King’s College London is committed to maintaining the highest degree of ethical conduct amongst all its staff, students, volunteers and associated personnel. In addition to the KCL Safeguarding Policy, this international protocol provides additional information, guidelines, practical recommendations and procedures to guarantee the implementation of the KCL policy in line with internationally recognised standards of safeguarding.

The objective of this Protocol is to create a safe and trusted environment to support the protection of affected populations from harm, and where we as an organisation are accountable for our behaviour. This includes harm arising from:

- The conduct of team members associated with KCL
- The design and implementation of KCL’s programmes and activities

The Protocol lays out the definitions and commitments agreed upon by KCL and informs team members of their responsibilities in relation to the prevention of safeguarding issues. It lays out how KCL’s obligations for reporting in its international work and response mechanisms This Protocol is referenced in all agreements with personnel regarding their international work.

This Protocol does not cover:
• Safeguarding concerns in the wider community not perpetrated by KCL or associated personnel
• Safeguarding concerns occurring in the UK not relating to international projects and programmes – this is dealt with directly under the core sections of KCL’s Safeguarding Policy

Safeguarding Contacts
As outlined in the KCL Safeguarding Policy, the Lead Safeguarding Officer (International) is:

Director at King’s Global Health

In addition to the Lead Safeguarding Officer, each international project will have a safeguarding contact identified in its documentation. The project you are working with will inform you of this.

Our Safeguarding Definitions
When we work in international setting, we use safeguarding to apply not only to children and adults at risk protected under UK legislation outlined in the KCL Safeguarding Policy, but also to the safety and welfare of all people involved in the delivery of, or receiving, or potentially to receive development assistance, through our programmes.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners, students, volunteers 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 systems must be survivor-centred and also protect those accused until proven guilty.

We define a beneficiary as anyone who directly receives goods or services from our international projects and programmes. Our international projects and programmes exist online and in person, and this Protocol applies equally to both of these.

Further definitions in addition to those in the KCL Safeguarding Policy are provided in the glossary in Appendix A

The Scope of this Protocol
King’s College London’s international programmes and projects have a substantially wider scope of contact and interaction with safeguarding populations than KCL’s normal activities. The scope of this document covers:

• All staff contracted by KCL or subsidiary organisations working on international projects
• All volunteers engaged on these international projects under the direction of KCL
• Associated personnel engaged on work or visits related to our international projects, including but not limited to: consultants; contractors; programme visitors including journalists, celebrities and politicians
The group will be collectively referred to as team members within this document

**Our Approach to Prevention**

**KCL responsibilities**

In addition to those responsibilities in the core Safeguarding Policy, KCL will:

- Design and undertake all its international programmes and activities in a way that protects people from harm that occurs from their coming into contact with KCL. This includes, but is not limited to, ensuring safeguarding risk assessments and mitigations are in place for all projects before commencement
- Take all reports of safeguarding concerns seriously, and follow up on them promptly and according to due process
- Make this policy publicly available to all affected communities, and commit to working with beneficiary populations to ensure they know about and how to access and use this protocol

**Team members**

In addition to the responsibilities outlined in section 4.04 of the KCL Safeguarding Policy, all people involved with the project are expected to:

- Act in accordance with the codes of conduct within the KCL Safeguarding Policy and for International Safeguarding (Annex C)
- Disclose relevant personal relationships, the procedure for which is covered in Annex D

All team member agreements for working on international projects will reference this document and the code of conduct contained within it. By signing agreements, team members will be agreeing to this code of conduct.

**Safeguarding Reporting**

**How We Enable Reports**

In addition to the procedures laid out in section 11 of the KCL Safeguarding Policy, we will accept complaints from external sources, particularly beneficiaries, but also members of the public, partners and official bodies.
Annex A – Further Definitions

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td><strong>Affected Populations</strong></td>
<td>Affected populations are determined to be those who are not currently receiving a direct benefit from the project but could do in the future. For in-country (non-UK) operations, this should include national members of staff or other associated personnel.</td>
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<tr>
<td><strong>Adult at Risk</strong></td>
<td>Sometimes also referred to as vulnerable adult. A person who is or may be in need of care 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.</td>
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<tr>
<td><strong>Beneficiary of Assistance</strong></td>
<td>Someone who directly receives goods or services from [NGO]’s programme</td>
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<td><strong>Child</strong></td>
<td>A person below the age of 18, as per the United Nations Convention on the Rights of the Child</td>
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<tr>
<td><strong>Harm</strong></td>
<td>Psychological, physical and any other infringement of an individual’s rights</td>
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<td><strong>Psychological Harm</strong></td>
<td>Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.</td>
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<tr>
<td><strong>Protection from Sexual Exploitation and Abuse (PESA)</strong></td>
<td>The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General’s Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).</td>
</tr>
<tr>
<td><strong>Sexual Exploitation</strong></td>
<td>The term ‘sexual exploitation’ means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.</td>
</tr>
<tr>
<td><strong>Survivor</strong></td>
<td>The person who has been abused or exploited. The term ‘survivor’ is often used in preference to ‘victim’ as it implies strength, resilience and the capacity to survive, however it is the individual’s choice how they wish to identify themselves</td>
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### Annex B – Training Matrix for Safeguarding

<table>
<thead>
<tr>
<th>Training level</th>
<th>Definition of level</th>
<th>In the context of the international work, which staff fall into this level?</th>
<th>For team members staff, what specific training is mandated (as a minimum) for staff at each level?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline for all staff</td>
<td>All team members who are not covered by levels below</td>
<td>No team members fall into this category</td>
<td>Clear referral guidance provided online and access to advice/support on safeguarding matters</td>
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</tbody>
</table>
| Level 1 | Staff more likely to need to identify and report a safeguarding concern – either because they have contact with beneficiaries in an international setting, or because their team, as a whole, regularly works with such group | All international project team members not explicitly covered at levels 2 or 3 below. This includes, for example:  
  - All volunteers interacting with partners  
  - All project staff | Awareness training dedicated online module/session. Examples include:  
  - InterAction PSEA  
  - Unicef Child Protection |
| Level 2 | Staff who manage areas identified as having routinely higher levels of contact with any affected population | All international project staff in management positions. This generally means anyone with a Manager or Director title. | All of the above training, plus advanced training externally delivered  
  - InterAction SEA investigations (online)  
  - InterAction Addressing SEA (workshops) |
| Level 3 | Staff with specific designated roles in our Safeguarding Policy or a specific lead responsibility in their job description for the promotion of safeguarding awareness or handling of safeguarding issues (either locally or College-wide) | • Partnerships Director  
  • Any other team member as designated | Specialist training externally delivered  
  - CHS Alliance PSEA & Investigations for Managers (workshop) |
Annex C – Overarching Safeguarding Code of Conduct

This Code of Conduct is referenced in all international team member agreements. By signing those agreements, team members agree to this Code of Conduct in addition to other codes specific to individual projects.

As a member of personnel associated with a KCL international project I will:

**Not engage in abusive or exploitative conduct**

- I will not engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child is not a defence.
- I will not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance.
- I will consider the unequal power dynamics of sexual relationships with beneficiaries and disclose any relationships in accordance with the relevant procedures.
- I will not engage in any commercially exploitative activities with children or adults at risk including child labour or trafficking.
- I will not physically assault anyone we work with.
- I will not emotionally or psychologically abuse a child or adult at risk.

**Be responsible for the use of information, assets and resources to which I have access by reason of my engagement with KCL**

- I will not use KCL IT equipment, software or e-mail and social media platforms to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism.
- I will not use KCL IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse.
Annex D – Relationship Disclosure Policy and Procedure

Definition

In the context of this policy, a personal relationship with safeguarding issues is defined as a romantic or sexual relationship with a beneficiary or other affected population. As a reminder, this does include national members of staff or other associated persons relating to in-country (non-UK) operations.

Team members must always maintain appropriate professional boundaries with beneficiaries and affected populations and should not pursue and/or develop close personal relationships with them. These are discouraged in line with our definition of safeguarding. KCL recognises that particularly for teams deployed internationally relationships may develop between consenting adults. This policy is designed to protect the organisation and team members in such situations.

These relationships intrinsically involve differentials of power, regardless of the person’s relative social standing within their context. As such, their potential impact needs to be considered carefully. For the organisation, KCL needs to consider the range of safeguarding risks involved. Some of the questions both should consider include:

- Is a personal relationship seen to offer advantage to anyone in terms of the delivery of the programme?
- Is the relationship potentially interfering with the professional conduct of KCL business?
- Is the relationship potentially having a negative effect on the workings of a team?
- How would the relationship be perceived by other partners and organisations in the country you are in?
- How would the relationship be perceived by donors and in the press?

Relationships of this type can possibly affect the reputation and funding of KCL, and it is necessary to be aware of the risks in order to take the appropriate mitigation actions.

Any relationships with beneficiaries or affected populations must be disclosed to your line manager as soon as is practical. This can be done in confidence and in person. This will then be discussed with the relevant safeguarding lead and escalated if necessary.

All relationship disclosures of this type will be treated and documented as a safeguarding report as outlined in Annex D. The case will be reviewed and KCL reserves the right to make any decisions necessary in line with its safeguarding policy.