

# King's Global Health Partnerships Safeguarding Policy

## 1. Objective and Policy Statement

King's has a **zero tolerance approach** to any attitudes or behaviours that put children, vulnerable adults or the communities we work with at risk.

This King's Global Health Partnerships Safeguarding Policy provides additional information, guidelines, practical recommendations and procedures to the King's Safeguarding Policy to ensure that King's is able to maintain an appropriate and safe environment in the international contexts in which we work.

### Safeguarding Definition

Safeguarding refers to mechanisms put in place to mitigate the risks, and respond to events, of sexual exploitation, sexual abuse, bullying or harassment.

Safeguarding incidents are acts of serious misconduct and are grounds for disciplinary action, up to and including dismissal and referral to relevant authorities for criminal prosecution.

### Sexual Exploitation and Sexual Abuse

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual exploitation means any actual or attempted abuse of a position of power or trust for sexual purposes.

**In some countries prostitution is legal, but no matter what law the country adheres to, any exchange of money, employment, goods or services for sex, whether on or off duty, by King's College London staff, volunteers or affiliates is prohibited.**

### Bullying and Harassment

Harassment is unwanted behaviour that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, or an abuse of power in ways intended to undermine, humiliate, denigrate or injure the recipient.

## 2. Scope of the International Protocols

The King's safeguarding international protocols protect:

### Children

People below the age of 18

### At risk adults

A person who is, or may be, in need of care by reason of mental or other disability, age or illness; and who may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation

Affected populations/patients/students

Anyone who can be exploited through an imbalance of power, Particularly anyone who directly receives goods or services from our programmes, or who potentially may receive some development assistance through our programmes.

The protocol aims to protect children, vulnerable adults and affected populations from:

- Staff, volunteers or affiliates contracted by King's (international and national).
- Anyone engaged with work or visits related to our organisation, including but not limited to consultants, volunteers, contractors, and programme visitors.
- Downstream partners or organisations or companies with whom we are working with who are also expected to adhere to international safeguarding standards.

Our international projects and programmes exist online and in person, and this Protocol applies equally to both.

This Protocol does not cover:

- Safeguarding concerns in the wider community not perpetrated by persons associated with King's
- Safeguarding concerns occurring in the UK not relating to international projects and programmes – this is dealt with directly under the core sections of King's Safeguarding Policy

King's has additional policies which cover areas not covered by the Safeguarding Policy including sexual harassment in the workplace and whistleblowing. Please refer to the policies below for incidents not covered under the safeguarding policy:

*Whistleblowing Policy*  
*Dignity at Work Policy*  
*Misconduct Policy*  
*Bullying and Harassment*  
(Add hyperlinks and policies)

### **3. Prevention**

A key focus of the international safeguarding protocol is ensuring safe recruitment practises that help to avoid hiring any persons that may propose a safeguarding risk. To this end the following processes now form an essential part of the recruitment process for all staff, volunteers and affiliates

DBS Checks

All team members that have direct contact with participants in LMICs in line with King's HR regulations and that have been resident in the UK must take a DBS (criminal background) check as part of the onboarding process.

DBS checks need to be renewed every three years and are divided into two types: standard and enhanced. Enhanced checks are required for all staff, volunteers or affiliates who will be dealing with children, including all clinical staff.

For team members that have not been resident in the UK, alternative criminal background checks will be requested where available.

### References

An explicit safeguarding question is included in all reference requests for new volunteers and employees. Two reference letters from previous employers and/or academic supervisors are required before employment, or a volunteer position, can begin.

For team members resident in a country where criminal background checks are not available, a third reference will be requested.

### Contracts and Code of Conduct

All staff must sign a contract before commencing employment with King's. King's College London's zero tolerance approach to safeguarding infractions is included in all staff and affiliate contracts including for consultants and contractors. Volunteers are required to sign a separate Volunteer Agreement that also reiterates King's' commitment to safeguarding.

All staff, volunteers and affiliates, including consultants and contractors must read and sign the International Programmes Code of Conduct prior to travel (see Appendix X)

**Breaches of the Code of Conduct will result in disciplinary procedures, up to and including dismissal and referral to authorities for criminal prosecution.**

### Training

During the onboarding process all staff, volunteers and affiliates will attend an in-person/Microsoft Teams safeguarding training session conducted by the appropriate Designated Safeguarding Officer or onboarding staff member.

The following online course must also be completed before travel can occur, with a screenshot of the final page to be sent to HR to be stored in the person's HR file.

- <https://www.interaction.org/courses/sea101v2/>

All Designated or Lead Safeguarding Officers must in addition attend specialised Bond safeguarding training:

- <https://www.bond.org.uk/learning/good-safeguarding-practice>

#### **4. Raising a concern**

Survivors of exploitation or abuse often do not report incidents through established reporting mechanisms so it is essential for all staff and volunteers to be sensitive to incidents of bullying, harassment, sexual exploitation or abuse.

Reports may be received through:

- Formal written reports through internal Complaints policy
- Informally via text, social media etc.
- Via community-based complaints mechanisms
- Disclosures made directly to staff members
- Concerns or reports about others raised to staff members
- Rumours or gossip

Reports in LMIC contexts are most frequently made in person to junior staff members and volunteers as they are considered more approachable.

All staff, volunteers and affiliates are obligated to report any potential incident, abuse or concern that they witness, are made aware of, or suspect within 24 hours.

Reports of abuse or exploitation from within the community that are not perpetrated by anyone connected to King's are beyond the scope of this policy. However, it is encouraged for these to still be reported to the relevant Designated Safeguarding Officer as the DSO may be able to signpost to appropriate authorities or organisations that can assist.

#### **5. Survivor Centred Approach**

It is important not to force a course of action on a survivor. Some people may wish to report an incident to the police, others may not want to. It is important to respect their decisions.

In some countries reporting safeguarding incidents to police or other authorities may cause serious repercussions for the survivor, including imprisonment and risk to life.

The King's Safeguarding International Protocol seeks to empower the survivor by exploring the options available without imposing ideas or opinions on the most appropriate course of action.

Reporting safeguarding incidents may pose administrative, financial, logistical and emotional challenges to survivors. King's owes a duty of care to survivors that includes helping them to access services which can include:

- Medical support
- Mental health services
- Transportation to appointments
- Compassionate leave
- Accompaniment to police meetings
- Translation services
- Childcare support during appointments occurring as a consequence of a safeguarding incident
- Signposting to other services as required

## 6. Reporting Process

Each international project at King's is required to have a Designated Safeguarding Officer to receive safeguarding reports. An up to date list of DSOs can be found in the Safeguarding section of the King's College London website.

DSOs are responsible for completing a safeguarding incident report detailing the safeguarding concern and escalating this to the Lead Safeguarding Officer. The LSO will evaluate the information and open an investigation if it is considered that a safeguarding incident has occurred.

If there are any concerns that the designated DSO or LSO is implicated in the incident or may not act objectively then it is advised to contact alternative DSOs or LSOs from the approved list.

Once an investigation is opened a Safeguarding Investigations Manager will be appointed. The role of the Safeguarding Investigations Manager is to arrange for an external investigator to be contracted to ensure impartiality during investigations. The Safeguarding Investigations Manager will then support the external investigators to conduct their investigations, including arranging interviews for them, supervising timelines, travel and payments and reviewing findings of the investigation.

The findings from the external investigators will be submitted to the LSO, DSO and College Council to make a decision on the outcomes of the investigation, including disciplinary procedures and referral to relevant authorities where appropriate. Confidentiality will be maintained throughout the process.

Those involved in the safeguarding incident will be informed of the outcome of the investigation but will not be kept up to date during the course of the investigation. King's aims to make a decision within one month of a report being made, although depending on the circumstances this timeframe may increase.

## 7. Reporting to Donors and Regulatory Bodies

Many institutional donors and private funders have additional safeguarding reporting requirements. All safeguarding incidents must also be reported to the Charity Commission in the UK.

It is the responsibility of the Lead Safeguarding Officer for international partnerships to ensure that safeguarding reporting requirements are met for all grants and contracts awarded to King's in the event of a safeguarding incident.

Further guidance on reporting to the FCDO can be found [here](#).  
Further guidance on reporting to the Charity Commission can be found [here](#).