



Safeguarding Policy

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1. Terms and Definitions

When used in this document:

“Affected Communities” refers to the population that has been affected by the disaster or conflict to which we are responding.

“Associate” refers to a range of contracted paid and non-paid individuals who have committed to work with or support a ShelterBox Entity other than Partners. It includes, among others, board members, donor representatives, volunteers (including community volunteers), interns, sponsors, researchers, consultants, and contractors.

“Child” in line with the United Nations Convention on the Rights of the Child and for the purposes of this Global policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1)

‘Gender Responsive Safeguarding’ is a safeguarding approach that:

- Takes full account of gender in considering the specific safeguarding needs of women, men, people living with disabilities (PWD), girls, boys, and other gender identities.
- Integrates safeguarding measures that address protection risks for people (girls, boys, young women, young men, and children of other gender identities) that stem from issues relating to gender bias and discrimination; and
- Supports the empowerment and fosters the inclusion of women and PWDs, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection

“Harm” is any detrimental effect on an individual including children and vulnerable adults physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

“Manager” refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Associates.

“Partner” refers to groups, or organizations that collaborate with ShelterBox on its responses and work with ShelterBox to achieve our overarching safeguarding objectives, ensuring the safety and well-being of our programme participants.

“Protection from Sexual Exploitation and Abuse (PSEA)” refers to a set of standards, principles, and procedures established to prevent sexual exploitation and abuse by and against individuals, especially in humanitarian, peacekeeping, and development contexts. PSEA for ShelterBox is aimed at individuals in positions of authority, such as staff, Associates, visitors, volunteers, ShelterBox representatives, and anyone who may take advantage of vulnerable populations.

“Safeguarding” refers to the preventative and responsive responsibilities, alongside referral measures that we undertake, to protect anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including staff, SRTs, volunteers, fundraisers, supporters, members of the public and members of the affected Communities to ensure they are not subjected to any form of harm because of their association with ShelterBox. This includes, ensuring that their contact with us and those associated with us and/or their participation in our activities, events, interventions and operations is safe and where there are concerns over their welfare or where they have been subjected to violence, appropriate and timely actions are taken to address this, and incidents are analysed to ensure continued learning for ShelterBox Entities.

“Sexual harassment” refers to unwanted conduct of a sexual nature perpetrated against anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work by staff, partners, Associates, visitors and any ShelterBox representatives. It can be directed towards one person, groups of people or towards everyone and can occur as a one-off incident or be a pattern of harmful behaviour. Sexual harassment can take many forms, including (but not limited to):

- Verbal comments of a sexual nature, such as remarks about an employee's (staff, volunteers)/programme participant appearance, questions about their sex life or offensive jokes;
- Non-verbal such as displaying pornographic or explicit images, staring, sexual gestures or written comments of a sexual nature;
- Physical such as unwanted physical contact, touching, and assault (this includes attempts and threats to do these things).

“Sexual Violence” refers to any sexual act or attempt to obtain a sexual act. In addition, unwanted sexual comments or advances or inappropriate acts. For ShelterBox three types of sexual violence are commonly distinguished: sexual violence involving intercourse (i.e., rape), contact sexual violence (i.e., unwanted touching, but excluding intercourse) and non-contact sexual violence (i.e., threatened sexual violence, exhibitionism, and verbal sexual harassment).

“ShelterBox representative” refers to staff and volunteers, trustees, affiliates, partners, consultants, contractors (including freelance photographers, drivers, fixers etc.), casual labourers, donors, Rotarians, and anyone else who is representing ShelterBox.

“Survivor” refers to 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.

“Survivor-centred” approach refers to prevention and response strategy that are non-discriminatory and respect and prioritise the rights, and needs and wishes of survivors, including groups that are particularly at risk or may be specifically targeted for sexual exploitation, abuse or harassment (SEAH).

“Survivor-led approach” refers to the approach that empowers the survivor to take a role in decisions that affect them, equipping and empowering survivors to take a leadership role in their own life and in the larger movement against the form of abuse and/or exploitation they have endured and overcome.

“**Staff**” refers to individuals who receive a regular salary for work in any ShelterBox Entity as well as ShelterBox volunteers.

“**Violence**” includes all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation of vulnerable groups. Violence consists of anything which individuals, groups, institutions, or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the members of Affected Community's dignity and survival and development.

“**Visitor**” refers to a range of persons who are visiting our offices or programmes and may come into contact with members of Affected Community we support through a ShelterBox Entity, including journalists, media, researchers, visiting sponsors and celebrities.

“**Vulnerable Adult**” refers to any person aged 18 years and over who is or may need community care services by reason of mental health issues, learning or physical disability, sensory impairment, or unable to protect themselves due to age or illness and who may be unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation”.

“**We**” refers to all ShelterBox entities, including the headquarters in UK.

2. Scope

This policy focuses on protecting all people who come into contact with Shelter Box, or its affiliates of subsidiaries, including members of the Affected Communities. It applies to:

- a. ShelterBox Trust in the United Kingdom and any other offices, some of which operate as subsidiaries and all ShelterBox affiliates.
- b. All other ShelterBox representatives.
- c. All activities implemented by ShelterBox such as aid delivery, fundraising events and activities, or any other service which ShelterBox provides.

The policy also covers the process of reporting from any ShelterBox representative as well as from communities/individuals we work with, or any member of the public, whether an individual, company or other entity, in the UK or anywhere else in the world.

This policy does not form part of a staff terms and conditions of employment and may be subject to change at the discretion of management

This Policy does not cover Safeguarding concerns in the wider community not perpetrated by ShelterBox representatives or in connection with ShelterBox programmes¹

¹ *This policy does not form part of an staff' terms and conditions of employment and may be subject to change at the discretion of management*

² *This Policy does not cover Safeguarding concerns in the wider community not perpetrated by ShelterBox representatives or ShelterBox programmes*

Affected Communities

While covering all ShelterBox activities, this Policy is a significant tool in protecting people within the Affected Communities that we serve in various countries. Because of the power dynamics we hold as a humanitarian organisation, members of the communities that have been affected may be more vulnerable and at risk of various forms of violence, including sexual and gender-based violence. As a result, we are especially concerned with ensuring that they are protected from harm, abuse, exploitation, or any other type of violence because of their participation with us or our programmes, initiatives, events, and activities. Furthermore, we wish to ensure that our safeguarding approach and response to safeguarding issues are gender responsive and maintain an appropriate standard of care.

Children and Vulnerable Adults

Children and vulnerable people are an important area of focus in our safeguarding activities, and we may work with them directly or indirectly in our aid distribution and fundraising efforts. As a result, the scope of this Policy includes children and vulnerable people.

3. Purpose

ShelterBox acknowledges that violence against vulnerable individuals is common around the world and in all communities. Physical or emotional violence, injury and abuse, mistreatment, exploitation, and sexual abuse are all forms of violence against vulnerable groups. Furthermore, vulnerable groups may be vulnerable or at risk for a variety of reasons, including gender, sexual orientation, ethnic origin, disability, age, or sickness.

By promoting a gender responsive safeguarding approach in our work, we aim to reduce the risk of harm and violence, including SEAH, against anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including staff, volunteers, members of the Affected Communities, children, and at-risk adults.

The purpose of this policy is to ensure that;

- We protect people including vulnerable groups, particularly members of the Affected Communities, children and at-risk adults from any harm that may be caused due to their participation/association with the activities, operations, processes, and programme delivery of ShelterBox, its affiliates and subsidiaries. This includes harm arising from:
 - The conduct of staff, volunteers, partner organisations or other ShelterBox representatives;
 - The design and implementation of ShelterBox's programmes and activities;
- All who work for and engage with us are skilled, confident, understand, and are well supported in meeting their responsibilities to safeguard anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including Staff, volunteers and members of the Affected Communities that we support from violence and engage positively with them in ways that enhance the achievement of our purpose;

- We have in place procedures to prevent and deal with the actions/behaviour of our Staff, volunteers, Partners, visitors, or us as an organisation that result in violence against anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, , including Staff, volunteers and members of the Affected Communities that we support and/or places them at risk of the same; and
- Staff, volunteers and members of the Affected Communities that we work with are aware our responsibilities to prevent and respond to any harm against them arising from actions and behaviours of our Staff, volunteers, Partners and visitors, and the routes for reporting any concerns. Moreover, they understand how their concern will be addressed with confidentiality and that they will be survivor centred.

4. Policy Statement

ShelterBox has a strict zero-tolerance policy for exploitation and abuse. We believe that every person we interact with, regardless of race, religion or belief, ethnicity, indigeneity, disability, age, gender, gender identity, sexuality, sexual orientation, displacement, caste, poverty, class, or socioeconomic status, has a fundamental right to be protected from any form of harm, neglect, harassment, or exploitation by ShelterBox staff, volunteers, partners, or other ShelterBox representatives.

We are very conscious of the unequal power dynamics that exist across our organisation when we serve our beneficiaries. The possibility that certain individuals will use their position for selfish gain cannot be overlooked.

For us at ShelterBox, safeguarding entails taking comprehensive measures to prevent the occurrence of SEAH; diligently protecting, anyone and particularly the most vulnerable adults and children, from such harms; and responding promptly and appropriately when such incidents occur.

We are dedicated to preventing sexual exploitation and abuse (PSEA). ShelterBox will not accept any sort of sexual harassment, abuse, or exploitation by or against its representatives, whether staff, volunteers, Partners, or anyone involved with its operations.

We are firm in our commitment to safeguarding and PSEA, and we pledge to incorporate this commitment across our operations and processes through the three core pillars of prevention, reporting, and response.

As a ShelterBox representative, it is not your responsibility to determine whether there is proof of sexual harassment, abuse, or exploitation. However, it is mandatory that you report any concerns you may have, or reports made to you in accordance with a possible breach of this policy.

The core component of ShelterBox's accountability is actively collecting feedback and accurately responding to safeguarding reports. Efficiently responding to reports and learning from such incidents are critical for ShelterBox's continued growth and integrity.

This policy will address the following areas of safeguarding: child safeguarding, safeguarding at risk adults, and protection from sexual exploitation and abuse (PSEA). The policy lays out the commitments made by ShelterBox (ShelterBox's Safeguarding Principles), and informs staff, volunteers and other ShelterBox representatives of their responsibilities in relation to safeguarding. ²

5. ShelterBox's Safeguarding Principles and Commitment to PSEA

ShelterBox commits to addressing safeguarding throughout its work. This Policy implementation is guided by the three pillars of prevention, reporting and response.

Overarching Principles

1. We will respect the human rights of all people who come into contact with ShelterBox, or its affiliates or subsidiaries including members of the Affected Communities regardless of age, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socioeconomic or cultural background, class, any history of conflict with the law, or any other aspect of their background or identity. Inequality, exclusion, and discrimination shall be addressed and corrected.
2. We believe at ShelterBox that safeguarding is everyone's responsibility.
3. We commit to recruiting staff, volunteers, and other representatives in a safe manner and will not engage volunteers under the age of 18 in any deployment activities or programme delivery; however, volunteers under the age of 18 may work on fundraising events and other office events as needed.
4. We acknowledge that we have a safeguarding duty of care to all people who come into contact with ShelterBox, or its affiliates or subsidiaries including members of the Affected Communities (especially children and vulnerable adults), staff, volunteers (including those under 18 supporting fundraising and awareness event where applicable), and ShelterBox representatives, including where downstream partners are involved in programme delivery.
5. We will employ a **Do no harm approach** to all aspects of our fundraising operations, including events where ShelterBox is working with volunteers or fundraisers under the age of 18, ensuring they are not at risk of exploitation or abuse from guests, staff, volunteers and associates (including media).
6. We will employ a **Do no harm approach** in all stages of our activities, events, operations, thematic portfolios, programmes, projects, activities, influencing work, and interventions in both development and humanitarian settings thus ensuring that these are designed and delivered in a manner that does

² The policy lays out the commitments made by ShelterBox (ShelterBox's Safeguarding Principles), and informs staff, volunteers and other ShelterBox representatives of their responsibilities in relation to safeguarding.

no harm to the all people who come into contact with ShelterBox, or its affiliates or subsidiaries including members of the Affected Communities especially children and vulnerable adults that we support.

7. We will proactively work with Partners to ensure safeguarding standards are always incorporated to ensure our commitment to be accountable to all people who come into contact with ShelterBox, or its affiliates or subsidiaries including members of the Affected Communities. This includes, but is not limited to, ensuring that project agreements include a clause clarifying expectations and responsibilities around safeguarding, assessing the safeguarding capacity of Partners, and carrying out any capacity building around safeguarding that is necessary.
8. We acknowledge that we have responsibilities to all people who come into contact with ShelterBox , or its affiliates or subsidiaries particularly members of the Affected Communities. No individual, including children and vulnerable adults must suffer harm, intentionally or unintentionally, because of their engagement, association or contact with us whether as a participant in our programmes, projects, events, processes, or as part of a fundraising or influencing campaign.
9. We have a responsibility to inform and empower all people who come into contact with ShelterBox, or its affiliates or subsidiaries including members of the Affected Communities (especially children and vulnerable adults) that we work with so that they learn about and are better able to exercise their rights to protection. We will ensure through our Partners and Associates that programme participants understand the essence of this Policy (where applicable), our safeguarding commitment and the safe means via which they can report any concerns.
10. Understanding that exploitation and abuse include suppressing a person's ability to make decisions for themselves, we would adopt a survivor-led approach for responding to disclosures and a survivor-centred approach for decision-making.
11. We would ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to all those who come into contact with ShelterBox, its subsidiaries, affiliates, events and programmes, including staff, volunteers, other ShelterBox representatives and members of the Affected Communities we work with.
12. We will ensure that there are multiple channels through which safeguarding concerns can be raised.
13. We will act on safeguarding, harassment, sexual exploitation, and abuse concerns, ensuring that our actions are transparent, timely, confidential and appropriate considering their gender and other specific safeguarding needs and vulnerabilities. For harassment and bullying of staff, volunteers,

affiliates, or trustees- The Harassment and Bullying Policy would apply, although there could be some overlap with the Safeguarding Policy³

14. We will ensure that investigations are conducted in private, while respecting the rights and duties of everyone involved, including all witnesses and never criticise survivors or complainants for their actions or decisions.

Considering our commitment and accompanying principles, we give the highest priority to the safety and protection of vulnerable groups.

We will ensure our Staff, volunteers, Partners, Associates, and Visitors are supported to meet their safeguarding responsibilities and requirements, understand the specific risks to differing gender and other identities and how they can work and engage in ways that increase the safety and protection of those with whom we are in contact.

6. Mandatory Reporting

As an organisation, we define safeguarding concern/incidents as a violation of the Safeguarding code of conduct (see Annex 1) committed by our Staff, volunteers, Associates, partner organisations, visitors, and ShelterBox representatives against Staff, SRTs, volunteers, fundraisers, supporters, members of the public and members of the Affected Communities, including children and vulnerable adults. All ShelterBox Staff, Associates, visitors, Partners, and ShelterBox representatives are obligated to report any breach of the Safeguarding code of conduct outlined in this Policy, whether experienced, witnessed, reported to, or suspected.

It is the duty and the responsibility of all ShelterBox Representatives to report (in line with this Policy) any suspicions or incidences of inappropriate behaviour. Failure to report to a relevant person (including but not limited to safeguarding focal person, HR, Line manager, security focal point or any management staff) suspicion of abuse relating to someone else is a breach of Policy and could lead to disciplinary action being taken.

Breaches of this Policy will be investigated in accordance with disciplinary procedures in the Employee Handbook and contractual agreements, or a referral may be made to statutory authorities for criminal investigation under the law of the country in which they work. Breaches may incur sanctions including disciplinary action leading to possible dismissal of staff and termination of a partnership agreement.

Complainants will be protected from retaliation by establishing anonymous reporting methods, allowing them to voice their concerns without fear of retaliation, discrimination, or disadvantage.

³ For harassment and bullying of staff, volunteers, affiliates, or trustees- The Harassment and Bullying Policy would apply to instances like this, although there could be some overlap with the Safeguarding Policy

If a legitimate concern about the suspected abuse of a programme participant is raised but proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations.

7. Partners and ShelterBox Representatives

At ShelterBox our collaboration extends to various entities, including but not limited to:

- **Affiliates:** Groups or entities using the ShelterBox name and sharing similar aims closely aligned with our mission.
- **Contractors or Service Providers:** External entities providing specific services or products for our programme implementation.
- **Donors:** Individuals or organizations providing financial or material support.
- **Volunteers:** Those offering their time and skills without financial compensation e.g. Rotarians or SRT volunteers
- **Local or International NGOs:** Non-government organizations working in similar or related fields whom we partner with for project/programme design and delivery.

All partners are essential to our vision at ShelterBox and must adhere to the ShelterBox Safeguarding Policy or their own equivalent policy. Partners are expected to, where applicable, abide by the following safeguarding commitments when in partnership with ShelterBox.

a. Safeguarding principles and commitment to PSEA (see section 5)

b. FCRM Review and Appraisal by ShelterBox

All partners must affirm their commitment to allow ShelterBox to review and appraise their Feedback, Complaints and Response mechanisms (FCRM) ensuring the continuous alignment with our safeguarding standards. This means:

- Partners will provide ShelterBox with all necessary access and documentation related to their FCRM systems for a comprehensive review.
- Partners will actively engage with ShelterBox during the review process, addressing queries and facilitating necessary discussions.
- Partners will take on board recommendations and feedback provided by ShelterBox to enhance their FCRM systems.

c. Partner Capacity Building

Where considered necessary and as determined through ShelterBox's Organisational Capacity Assessment and review of the partners policies and practices, Partners will be required to:

- Engage in capacity-building programmes, workshops, or training offered by or recommended by ShelterBox to strengthen FCRMs, with particular focus upon transparency and 2-way communications processes
- Foster an environment where learnings from capacity-building initiatives are shared & internalised both within partner and ShelterBox to maximize impact.
- Provide feedback to ShelterBox on capacity-building initiatives to help refine and improve future efforts.
- Comply to the safeguarding policy where applicable and Sign and commit to the Safeguarding code of conduct (Annex 1)

d. Establish and/or Maintain a Suitable FCRM

All Partners are required to;

- If not already in place, develop a Feedback, Complaints and Response (FCRM) mechanisms that aligns with ShelterBox's standards and best practices in the sector.
- For partners with existing FCRM systems, they must commit to regularly update and maintain it to ensure it remains effective and relevant.
- Implement regular checks and evaluations of their FCRM mechanisms to identify areas of improvement and ensure its efficacy.

Where there is an incident that involves a partner organisation (their staff, associates volunteers etc) and or ShelterBox Staff/Associates, Partners are mandated to report within 72 hours to the designated safeguarding focal point within ShelterBox. Any breaches of the safeguarding partner commitment and code of conduct may result in the immediate cessation of our partnership.

8. Roles and Responsibilities

I. All Staff, Partners, Volunteers, SRTs, Trustees, Associates, and visitors shall:

- a. Commit and contribute to an environment where anyone dealing with ShelterBox its subsidiaries and affiliates, including children and vulnerable adults feel respected, supported, safe and protected.
- b. Never act or behave in a manner that results in violence against anyone dealing with ShelterBox its subsidiaries and affiliates, including children and vulnerable adults or places them at risk of violence.
- c. Be aware of and adhere to the provisions of this Policy.

II. All Staff, Volunteers (including those under the age of 18), SRTs, Trustees and Affiliates shall:

- a. Comply with this Policy, including signing the Safeguarding Code of Conduct (Annex 1);
- b. Report and respond to safeguarding concerns and breaches of the policy in line with the applicable procedures of the applicable ShelterBox entity.

- c. Participate in the mandatory online safeguarding trainings required at the time of joining the ShelterBox, as well as in-person/virtual annual refreshers that comply with this Policy.

III. Associates and Visitors shall:

agree and commit to the Safeguarding Policy, by signing the Safeguarding Code of Conduct (Annex 1)

IV. Programme Managers shall ensure that:

- a. Members of the Affected Communities
- b. (including children and vulnerable adults) with which we engage, work with is made aware of the provisions of this Policy or its equivalent to ensure they have the confidence to report any safeguarding concerns;
- c. all members of the Affected Communities, including children and vulnerable people, are informed of their rights and what constitutes a safeguarding concern/Issue/incident and how to report;
- d. they support and ensure systems are developed to maintain an environment which is safe for and prevents violence against members of the Affected Communities, including children and vulnerable adults; and
- e. they are accountable for ensuring that the Policy is fully embedded within their areas of responsibility

V. Regional Programme Directors shall ensure that:

- a. The feedback and complaints mechanism and associated processes and resourcing is established as an immediate priority.
- b. The policy and applicable procedures where feasible, be made available in local languages and child-friendly formats in their programming region; and
- c. This Policy and its execution are applied to their programming region, which includes the people (Staff, Partners if they do not have an equivalent Safeguarding Policy, Associates, and Visitors), as well as the procedures, programmes, projects, events, and activities reflect the safeguarding principles.

VI. Organisations and Associates that work with us in carrying out our fundraising activities, programmes, projects, processes, events and/or must comply with the Safeguarding Code of Conduct contained in (Annex 1)

VII. All ShelterBox Entities shall monitor compliance with this Policy

Annex 1: Safeguarding Code of Conduct

ShelterBox is committed to creating a safe environment for anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including staff, SRTs, volunteers, fundraisers, supporters, members of the public and members of the Affected Communities we work with or support. All staff volunteers, Trustees and ShelterBox Representatives have a duty to uphold the principles of the Safeguarding Policy and commit to maintaining an environment that prevents violence for everyone who comes into contact with ShelterBox, or its affiliates or subsidiaries including members of Affected Communities. Further to this, sexual exploitation, and abuse by staff, volunteers (including those that work in our humanitarian response) constitutes acts of gross misconduct and is therefore grounds for termination of employment.

As such, I (name of Staff, partners, SRTs, volunteers and trustees and ShelterBox Representatives) agree that I will:

a. Adhere to the Safeguarding Policy and be open and honest in my dealings with anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including staff, SRTs, volunteers, fundraisers, supporters, members of the public and communities participating in programmes, projects, processes, events, and activities.

b. Treat all people who come into contact with ShelterBox, or its affiliates or subsidiaries including children and vulnerable adults in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.

c. Create and maintain an environment which prevents the abuse and exploitation of anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including staff, SRTs, volunteers, fundraisers, supporters, members of the public and members of the affected communities including children and vulnerable adults ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action to minimise the risks

d. Contribute to building an environment where anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including staff, SRTs, volunteers, fundraisers, supporters, members of the public and members of the Affected Communities including children and vulnerable adults, we engage with are:

i. respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity, and evolving capacities; and

ii. well informed on their safeguarding and protection rights and what to do if they have a concern.

e. Display high standards of professional behaviour **always!**

f. Comply with all relevant international standards and local legislation in relation to child labour, and refrain from using children and young people aged below 18 years for domestic or other labour, if such work is inappropriate, exploitative, or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury, exploitation, or violence. In addition, I understand that I must not use children and young people of any age that we work with for domestic or other labour.

g. Respect the privacy and confidentiality of anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including staff, SRTs, volunteers, fundraisers, supporters, members of the public and members of the Affected Communities including children and vulnerable adults associated with ShelterBox. This means I will:

- o Never ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype, etc.) from any child or family associated or formerly associated with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by ShelterBox and/or for ShelterBox business purposes.

- o Never disclose, or support the disclosure of, information that identifies sponsored families or children, through any medium, unless that disclosure is in accordance with standard ShelterBox policies and procedures and/or has the explicit consent of ShelterBox. Media includes paper, photographs, video and social media.

- o Never make any contact with a child, young person, or family members associated with ShelterBox work that is not supervised by a (or another) member of ShelterBox Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.

- o Always ensure that when fundraising or on deployment for ShelterBox and I wish to take pictures of members of the Affected Communities including children and vulnerable adults, for official use, **I will:**

- Obtain consent forms in accordance with ShelterBox Content Gathering Ethics and Guidelines;
- Ensure the images are respectful and do not impact negatively on their dignity and privacy.
- Ensure that the use of the images does not put programme participants including children and vulnerable adults at risk of being identified or located.
- Never upload the images of any children and vulnerable adult associated with ShelterBox to non- ShelterBox social media pages without the full and explicit consent of ShelterBox.

h. Report any concerns or suspicions through the appropriate channels regarding safeguarding violations by a ShelterBox Representative or harm arising from the design and implementation of ShelterBox's programmes and activities.

I. Cooperate fully and confidentially in any ShelterBox investigation of concerns or allegations of abuse to anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work, including children and vulnerable adults.

j. Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with ShelterBox that relates to exploitation and abuse of anyone including children and vulnerable adults

I will not:

a. Abuse or exploit a child or young person or behave in any way that places a child or young person at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or child marriage.

b. Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence.

c. Engage in sexual relationships with members of Affected Communities as these undermine the credibility and integrity of ShelterBox work and are based on inherently unequal power dynamics.

d. Use physical punishment/discipline or use of physical force of any kind towards children, young people or vulnerable adults.

e. Engage members of the Affected Communities we work with including children or vulnerable adults in any form of sexual activity which involves the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to programme participants.

f. Use language or behave towards anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work including children or vulnerable adults in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate e.g. Fondle, hold, kiss, hug, or touch anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work including children or vulnerable adults.

h. Have a child/children/young person with whom I am in contact in a work-related context, stay overnight at my home or any other personal residential location or accommodation.

i. Use computers, mobile phones, video, and digital cameras to exploit or harass children or to access child pornography through any medium

j. Fail to disclose convictions or safeguarding related investigations that they are subject to.

The above is not an exhaustive list. Staff, Volunteers, Trustees, ShelterBox Representatives, Partners, Associates, and Visitors should consider all related actions and behaviour which may compromise the rights and safeguarding of anyone who has contact with ShelterBox, its affiliates or subsidiaries in the course of its work.

Annex 2: Raising a Complaint or Concern

A complaint or concern about safeguarding, particularly if a child or vulnerable adult is involved, should be reported **immediately or within 24 hours** in exceptional circumstances using one of the contact channels listed below, in accordance with the mandatory reporting obligation of all Staff, Volunteers, Associates, visitors, Partners, and ShelterBox representatives.

This section of the policy is applicable to all Staff, partners, contractors, SRTs, volunteers, Trustees of ShelterBox and ShelterBox Representatives. Affiliates are expected to report any SEA or safeguarding concerns they have/receive during events or within their operations using their local reporting mechanisms. As part of mainstreaming a comprehensive safeguarding culture, we also expect them to provide a summarised report or details (anonymized if necessary) to Safeguarding@ShelterBox.org so that we can benefit from the lessons learned and work together to address them (if they require any technical assistance) where applicable; within the wider ShelterBox group.

Our commitment to integrity, fairness, and ethical conduct always means that, the identity of individuals reporting concerns will be protected to ensure their safety and privacy.

Reporting safeguarding Issues generally

- **Email:** Fill the safeguarding incident form and send as an attachment to safeguarding@shelterbox.org
- **Post:** Disclosure of Malpractice. C/o HR Department, ShelterBox HQ, Falcon House, Truro, Cornwall TR1 2PH. The HR department will acknowledge all allegations.
- **Telephone:** You can use the independent whistleblowing service by contacting Safecall 24 hours a day, seven days a week: **By freephone: UK: 0800 9151571**. Please keep in mind that if you are calling from outside the UK, Canada, or the US, you must use the +44 UK country code (e.g. 44 800 XXX XXXX) and that calls to the safe call number will incur charges, making them no longer "freephone" calls. International rates will apply, which will vary depending on where you call from.
 - By freephone: **Philippines: 1800 14410499**
 - Other numbers are also available – please visit the Safecall website (below) for further details.
 - Via the web: www.safecall.co.uk/report/

Alternatively, if you are worried about reporting to the safeguarding advisor and team, complaint can be made to the Board of Trustees Safeguarding Lead at safeguarding_trustee@shelterbox.org

Reporting safeguarding issues related to UK based staff, associates or volunteers

Email: Fill the safeguarding incident form and send as an attachment to safeguarding@shelterbox.org

Telephone: You can use the independent whistleblowing service by contacting Safecall 24 hours a day, seven days a week: By freephone: UK: 0800 9151571.

- Other numbers are also available – please visit the Safecall website (below) for further details.
- Via the web: www.safecall.co.uk/report/

Post: Disclosure of Malpractice. C/o HR Department, ShelterBox HQ, Falcon House, Truro, Cornwall TR1 2PH. The HR department will acknowledge all allegations.

Alternatively, if you are worried about reporting to the safeguarding advisor and team, complaint can be made to the Board of Trustees Safeguarding Lead at safeguarding_trustee@shelterbox.org

Reporting safeguarding issues related to management (E.g. CEO, Donor, stakeholders, etc)

Reports involving senior management, such as the CEO, Donor, stakeholders etc will be addressed impartially, irrespective of the position or status of the individuals involved. Concerns can be reported through the following channels:

Email: Fill the safeguarding incident form and send as an attachment to safeguarding@shelterbox.org. This is managed independently from senior management to ensure impartiality (the safeguarding advisor and in the absence of the advisor, the complaints would be addressed by the HR manager)

Alternatively, if you are worried about reporting to the safeguarding advisor and team, complaint can be made to the Board of Trustees Safeguarding Lead at safeguarding_trustee@shelterbox.org

Reporting by ShelterBox staff and Volunteers only- In Case of Emergency (ICE) number

Employees and volunteers of ShelterBox can also phone the In Case of Emergency (ICE) number and ask to be contacted by a Safeguarding focal person.

Reporting response

- **Within 2 working days** of receiving the report, an acknowledgement of receipt will be communicated to the complainant by ShelterBox Safeguarding team (Advisor/Focal Point)
- **Within 2 working days of acknowledging the report**, the ShelterBox safeguarding team (Advisor/focal points as appropriate) will review the safeguarding reports and concerns to substantiate and determine the next line of action which could include an investigation or application of disciplinary actions.
- The next step of action will be communicated by the safeguarding advisor via email or post (where applicable) to the complainant (directly or through a third-party if complaint was received by a bystander) and the alleged perpetrator if applicable, no more **than 5 working days** after the complaint is received.
- ShelterBox will provide survivors of harm caused by contact with ShelterBox representatives or programming with psychosocial support through referral to partner agencies, regardless of whether a formal internal response (such as an internal investigation) is undertaken. The survivor will be supported to make decisions in their best interest.
- If an investigation is required, ShelterBox will inform the complainant (survivor/bystander where applicable) of the decision to undertake an investigation prior to conducting the investigation. The investigation will be conducted under the oversight of the case management team (see Annex 3 for reference) and recommendations from the investigation would be implemented in accordance with the severity of the violation of safeguarding code of conduct. This process would be implemented **within 6 weeks** of receiving the report.
- All safeguarding reports and concerns will be dealt with in a timely and efficient manner by the safeguarding team (Safeguarding advisor /focal points).
- If an investigation is conducted, whether the complaint is founded or unfounded, ShelterBox (the **safeguarding advisor/focal point**) will communicate the actions taken to the complainant, and if the complainant isn't the one directly involved but a third-party reporter, ShelterBox will ensure the complainant informs the direct sufferer of the complaint.
- Safeguarding reports including reports involving senior management, such as the CEO, will be directed to the Board of Trustees or an independent Ethics Committee. An independent investigator or audit committee may be appointed to ensure an unbiased review. Under the

serious incident requirement, Trustees have a duty to report all safeguarding incidents to the UK charity commission.

N.B- In a case where the safeguarding advisor is going on leave, the responsibilities outlined in the response and case management process will form part of his/her handover to one of the safeguarding focal points who will manage the concerns received in line with the process outlined in this document. Additionally, the response timeline outlined in the document accounts for periods when focal points may be on leave/holiday. However, our team is committed to ensuring that at least one person is available to respond during working days. Should a report be received over the weekend, please note that the response will be addressed on the following working day. While this may occasionally extend the response duration, we are dedicated to responding within the designated timeframe, ensuring timely and effective communication.