

Luna Children's Charity Safeguarding Policy

Implemented January 2016

Reviewed March 2018

Next review March 2019

This policy sets out standards and guidelines for keeping children safe. It describes Luna's commitment to ensuring that we meet the responsibilities set out in the UN Convention on the Rights of the Child – to protect children from all forms of abuse, neglect, exploitation and violence.

Luna trains and supports practitioners who work with children traumatised by conflict, violence and disaster in countries where trauma treatment for children is not available, or services are severely stretched and under-resourced. We also provide training and practical support for carers of traumatised children through our child rights projects. Practitioners can often be working in difficult circumstances where everyone struggles to prevent harm and minimise risk to children.

Luna volunteers and trustees do not have routine contact with children and these positions do not currently require a Disclosure and Barring Service check. Our major activity is training professionals who work with children. We meet children informally when visiting our special projects where we spend time with them and their carers.

The policy applies to every area of Luna activity and to everyone involved in them as a trustee, volunteer, work associate or partner. However we will need to work sensitively with partner organisations who ask for our involvement, as their situation may constrain their approach to safeguarding. We will need to understand their local context and share our expectations for working with them.

Overview of the policy

The Luna safeguarding policy sets out:

- Our guiding principles for keeping children safe
- Why we need a safeguarding policy
- Our understanding of what constitutes abuse
- How we aim to prevent harm and minimise risk to children in all areas of activity, including training, programme planning, child rights projects, fundraising, website, publicity, and partnerships
- How we maintain the safety of CATT practice - with practitioners trained by Luna
- Our procedures for reporting harm and taking action
- How we recruit new trustees, volunteers and associates

- How we ensure that everyone involved in Luna's work understands our approach to safeguarding and the responsibility they have for preventing harm and reporting concerns
- How we work with partner organisations overseas to uphold our safeguarding standards when working together on projects
- How we monitor, review and publicise this policy

Keeping Children Safe

Luna's mission is to advance the rights, education and health of children and young people who experience trauma as a result of conflict, violence and disaster. As an organisation we are completely committed to preventing harm and reducing risks to children within any Luna activity undertaken by anyone involved with our work.

The practitioners we train work with children who have experienced, witnessed and sometimes carried out extreme violence. The consequences of traumatic experiences and the symptoms of post-traumatic stress disorder (PTSD) can be overwhelming for children and make them feel unsafe in every area of their life. We train people to use a child-centred treatment protocol – Children's Accelerated Trauma Therapy (CATT) – which is designed to feel safe and unthreatening for a child. This has been developed specifically to help children with PTSD by Luna's founder Carlotta Raby.

Through our relationships with partner organisations overseas we create a teaching environment within which practitioners explore the rights of children, and learn to use a treatment protocol that cares for the physical and emotional safety of the child at every stage.

It is important for Luna to open dialogue with partners about safeguarding, so that it becomes something we can and do discuss. This is an opportunity for Luna to ask about local practice and show sensitivity to very challenging situations for children and those working with them. Our CATT training includes learning on safeguarding – we facilitate discussion within the local context and share (but not impose) our UK/Western view.

Why we need a Safeguarding policy

As a charity working for the rights and health of traumatised children we want to demonstrate to everyone involved with us, and to potential stakeholders and partners, that Luna can be trusted to safeguard children. We will ensure that all trustees, volunteers and associates understand their responsibility to prevent harm and minimise risk, and know how to respond if they have concerns about a child.

With this policy we recognise that all children have equal rights to protection from abuse and exploitation. We also recognise that our standards may be more difficult

or challenging to apply in some countries and local contexts than others, and we will need to work with partners to meet our minimum expectations, set out in this policy under “Working with partner organisations...” .

Having a Luna safeguarding policy does not mean that we can eliminate all harm to children. Luna will do everything possible to understand and minimise risk, and address concerns and incidents robustly. Luna firmly upholds the safety of the CATT protocol for traumatised children through training and on-going supervision and support for practitioners.

Our understanding of what constitutes abuse

Definitions of harm – taken from Keeping Children Safe (guidance for relief and development charities)

It is difficult to define “harm” to children because children can be abused in so many ways depending on the context and culture. They may be abused in a family, an institution, community or faith setting, or via social media/internet. They may be harmed by an adult or adults or another child or children. There are also practices such as female genital mutilation (FGM), forced or early marriage that cause significant harm to children.

The following definitions can be used as a guide:

Physical abuse: actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Sexual abuse: forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.

Child sexual exploitation: a form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim’s options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual.

Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It

can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

Neglect and negligent treatment: allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.

Emotional abuse: persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

Commercial exploitation: exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

How we aim to prevent harm and minimise risk to children in all areas of Luna activity

We will:

- i. Ensure that everyone involved with Luna's work understands our approach to safeguarding and the responsibility they have for preventing harm and reporting concerns
- ii. Have a designated Safeguarding Officer, and procedures to follow for reporting concerns and taking action
- iii. Integrate the identification and mitigation of child safeguarding risk into Luna's Risk assessment process at all levels – from identifying corporate risks and training impact, through to fundraising and communication
- iv. Ensure the safety of CATT practice through support and supervision, and a forum for practitioners to share cases
- v. Have recruitment and induction procedures for trustees and volunteers that deter potential abusers and minimise the risk of harm to children within the scope of Luna's work
- vi. Have a *Code of Conduct* for trustees, volunteers and associates that states Luna's expectations on appropriate behaviour towards children

Work with partner organisations overseas and in the UK to share and uphold our safeguarding standards

Procedures for reporting concerns and taking action

Role of the Safeguarding Officer

The Safeguarding Officer is: Brenda Graham, Luna trustee. She can be contacted via the website. Trustees and volunteers will have direct contact details when undertaking Luna work. The Safeguarding Officer acts as a focal point for trustees and volunteers if they have concerns about harmful treatment of a child or children. The concern may arise from observing or discovering harm, suspecting harm, or from disclosure by a child. Practitioners on CATT training share their anxieties and concerns about their practice. As trainers we have to think how to respond and advise if we learn of harmful behaviour (by others) from participants, and be very aware of local conditions eg how authorities such as the police might respond.

The SO decides when to refer a child abuse concern to the authorities (usually after discussion with the chair of trustees). The SO will gather information and seek advice from local partners, but if there is any doubt about the extent of the concern the SO will always err on the side of making a referral.

The Safeguarding Officer is responsible for:

- ensuring that the Safeguarding policy is communicated to everyone involved with Luna, and that it is monitored, reviewed and updated
- acting promptly to protect a child, and to maintain the integrity and reputation of Luna
- following Luna's procedures for dealing with allegations or disclosures of abuse – see Role of the *Safeguarding Officer*'
- supporting trustees and volunteers with their safeguarding responsibilities

Definitions of 'child' and 'child abuse' may differ according to national and cultural understandings. However we are clear that 'children' are defined as anyone less than 18 years of age, and that 'abuse' is the range of acts, intentional or not, which harm children. See p.2 *Our understanding of what constitutes abuse*. It will be part of our planning and risk assessment to identify local legal, social welfare and child protection arrangements in the countries we visit. We need to be prepared to take action locally when concerns arise, and have information available on: local services; the authorities to whom we should report concerns; and organisations which can provide support to children. We have a *'Checklist of local information and resources'* for safeguarding, that we use when planning overseas trips.

Reporting and recording concerns about harm

Everyone involved in Luna's work needs to be alert to signs that may suggest a child or young person is in need of help. Deciding whether to report can be a very difficult responsibility. There is a simple model that helps:

When a child safeguarding concern is brought to our attention – **ACT**

Act on concerns, if in doubt speak out!

Child-centred – the protection of children is the most important consideration

Time counts – our response to safeguarding issues must be timely, effective, confidential and appropriate

Luna expects everyone involved with our work to report concerns or suspicions immediately to the Safeguarding officer, by phone or email. The SO will keep a formal record.

The SO will discuss the concern in confidence and consider:

- Does the concern meet our stated understanding of abuse?
- Is the local context fully understood?
- Involving our partners and professionals
- How the concern should be investigated
- Reporting to an appropriate authority

The SO will keep records of concerns and allegations and actions taken. and store them securely.. The chair of trustees and the safeguarding officer will have access. Any transfer of information must maintain confidentiality and only be made available to relevant parties.

If an allegation is made against a Luna trustee, volunteer or associate they will be suspended from all activity by the chair of trustees and SO pending an investigation. The process will be confidential and limited to those who need to know. The SO response will depend on the level of concern. A minor breach of the Code of Conduct will be managed through training and monitoring of behaviour, but any more serious allegation will mean involving UK police and social services, and ending the relationship with Luna. Luna's guiding principle is that the best interests of the child are paramount. We will act with honesty and integrity where failings in our people are found.

How we identify and mitigate safeguarding risk

We incorporate analysis of safeguarding risks into the risk assessment for training trips overseas – identifying our potential impact on or contact with children in a specific local area

We determine the local approach to child abuse and whether country laws and authorities are weak or strong in responding to abuse

We use a mapping exercise to assess the local legal, welfare and child protection context, and gather information on local resources and sources of support for children. See *'Checklist of local resources and sources of support for children'*

We evaluate all other aspects of Luna activity for their impact on children, such as: fund-raising by schools and individual children; Website and Facebook – use of language and photos; language, images and materials used for training practitioners

We have a recruitment and induction process that ensures all trustees and volunteers understand Luna's expectations of their behaviour, and their responsibility to report concerns

How we ensure the safety of CATT practice

We work to quality standards for recruiting and training practitioners and trainers. CATT Practitioner training and Trainer training are delivered by experienced mental health practitioners and trainers. Competence to practice CATT or to train others is assessed during and at the end of the training.

We work with partner organisations to develop post-training supervision and support opportunities for practitioners. We also facilitate peer supervision and support via a moderated confidential forum on the practitioner section of the Luna website.

We assess CATT clinical knowledge and competence of experienced practitioners who wish to become trainers

How we recruit trustees and volunteers, and occasional fixed term paid posts

Luna has a Trustees and Volunteers Recruitment policy.

Our recruitment process aims to deter potential abusers from working with Luna and to fully inform applicants about the safeguarding responsibilities that come with any Luna role. We will make a fair assessment of suitability for a role or post and comply with regulation and good practice.

The process includes confirmation of identity; consent to gain information on background, proof of qualifications, and verification of identity of referees. There is a procedure for shortlisting and interviewing.

Luna's current work is to train practitioners who work with children. Trustees and volunteers do not have routine direct contact with children and these positions are not 'regulated' under the Criminal Justice and Court Services Act 2000. However there are often opportunities to meet and spend time informally with children in overseas projects.

We require UK applicants to sign a Statement of Commitment to the Luna Safeguarding Policy and Code of Conduct, and to provide two character referees who have known them for more than two years.

We require local volunteers to comply with their country equivalent to a vetting and barring scheme, if one exists, and to sign a Statement of Commitment and Code of Conduct as for UK, and provide character referees

We will require a Disclosure and Barring Service check for any Luna role which becomes regulated in the future

We will only recruit volunteers under 16 years if the venue for their Luna activity is their school, youth or community group. Young people between 16 and 18 years will be permitted to attend other venues if they are chaperoned by a responsible adult such as parent or guardian.

Induction of trustees and volunteers

Induction will focus on understanding and carrying out the responsibilities described in the Safeguarding policy and Code of Conduct.

How we ensure that everyone involved in Luna's work understands our approach to safeguarding and the responsibility they have for preventing harm and reporting concerns

The Safeguarding policy, with associated procedures, is reviewed annually by the Trustees. We publicise the policy to all current volunteers and associates, with a request for their written commitment to it. We will encourage questions and discussion, and respond fully to individual queries and concerns. The policy will be available on the public and practitioner sections of the Luna website <http://lunachildren.org.uk> and publicised in the News section of the Home page. It will also be publicised on Facebook <https://www.facebook.com/Lunachildrenscharity?ref=ts&fref=ts>

New recruits will undertake induction with the Safeguarding Officer.

Working with partner organisations in the UK and overseas to uphold our safeguarding standards when working together on projects

Luna delivers training in collaboration with local partner organisations all around the world, and our model is proving to be very successful. We have provided CATT training in Rwanda, Uganda, South Africa, Tanzania and Malaysia, and with those supporting children in the Syrian refugee camps in Turkey, Lebanon and Jordan. In addition, we have held training in the UK for mental health professionals from Pakistan and Nigeria.

Luna works with partner organisations in a number of different ways:

- At the request of an overseas organisation to deliver CATT training – the organisation acts as host for the course, the participants and the Luna trainers, with funding from Luna
- Collaboration with other charities on overseas projects – sharing resources, expertise and local knowledge
- Supporting an organisation with resources, additional training and consultancy

Partner organisations overseas, and the practitioners they bring to CATT training, are usually working in difficult and professionally challenging circumstances. An organisation may not have a fully formed safeguarding policy, and their country may have differing legal and cultural approaches to preventing harm to children. Luna will aim to develop relationships with partners within which we can be open about our safeguarding standards and acknowledge their constraints and areas of difference.

In every type of partnership we will share our Safeguarding policy and ask the partner to share their own or commit to developing appropriate safeguarding measures. Every formal partnership agreement will include clauses that reflect this requirement.

Before discussing safeguarding with an overseas partner we will find out what we can, through our mapping exercise, about their local laws and systems for protecting children from harm, and also gather information on local resources and sources of support for children. See '*Checklist of local information and resources*'.

We will be culturally sensitive while never condoning any acts that harm children

At a minimum we will want to see a policy or development work that shows:

- Awareness of children's rights to be safe, and to know where to go for help if they are being abused
- How staff, volunteers and others can raise concerns

- Clear mechanisms for dealing with concerns and incidents and reporting to authorities
- The kinds of checks that are made on adults directly involved with children.. Where no formal checks exist we will discuss with the partner how they determine the integrity of participants in the CATT training. Guidelines for acceptable and unacceptable behaviour by staff

For our part we will tell partners that:

- Luna volunteers working with them will adhere to our policy
- Luna volunteers will report any concerns involving either Luna people or partner staff to the Luna Safeguarding officer
- The Luna Safeguarding officer will report the concern to the partner's senior management and expect to be kept informed of progress and outcomes
- If the concern is about a Luna volunteer the Safeguarding officer will inform the partner about how it is dealt with

How we monitor and review our Safeguarding policy

We are committed to monitoring how well we are living up to the commitments we are making and asking of others. As a small charity we rely on our trustees for oversight and governance of the policy. They will require information maintained by the SO and the Chair, and feedback from Luna volunteers and partners. The quarterly trustee meeting will be the main forum for monitoring the effectiveness of the policy.

There are a number of actions we can take to check our progress and learn from safeguarding situations that arise:

- Report on the roll-out of the policy to current trustees and volunteers
- Assess the impact of the policy on recruitment practice and outcomes
- Feedback the experience of sharing safeguarding practice with partners
- Risk register – review the effectiveness of risk mitigation strategies for safeguarding, such as those included in a risk assessment for an overseas training trip
- Assess the effectiveness of the safeguarding officer role in inducting new people, and dealing with safeguarding issues
- Monitor data from the Practitioner section of the website
- Have a slot for safeguarding issues on every Trustee meeting agenda

The Safeguarding policy will be formally reviewed and amended annually, at the last trustee meeting of the year - We will expect to find that:

1. Trustees and volunteers are familiar with the policy, can discuss safeguarding openly, and know how to deal with any concern about a child or children
2. Recruitment of trustees and volunteers includes clear discussion, understanding and acceptance of the policy and its responsibilities
3. We have shared the policy with all partners we work with during the year and gained their commitment to our minimum expectations of safeguarding practice
4. We have dealt appropriately with any concerns about a child, including any incidents arising via cases on the Practitioner section of the website
5. We may want to make amendments to the policy or procedures based on our the experience of the year

Stella Charman – Chair of Trustees

Brenda Graham – Trustee and Safeguarding Officer

March 2018