

# Safeguarding Policy

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**The Duke of Edinburgh's International Award Foundation**

10 June 2020

Version: 2.0



## Version control

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Version	Date	Author	Notes
1.0	25 April 2018	Operations	
2.0	10 June 2020	Sam Williams and Claire Lynch	Includes formal guidance and resources from the UK Government, UK Charity Commission and UN Convention on the Rights of the Child.

## Relevant Policies and documentation

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1. International Licence agreements
2. Serious Incident Reporting Policy
3. Code of Conduct
4. Whistleblowing policy
5. Fundamental, Operational Principles and Code of Practice
6. Memorandum of Understanding (MOU) International Award Association (IAA)

## Contents

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Version control.....	1
Relevant Policies and documentation .....	1
Contents.....	2
<b>1 Keeping those involved with the Award safe from harm .....</b>	<b>3</b>
<b>2 Definitions and principles of safeguarding.....</b>	<b>4</b>
<b>3 Safeguarding framework.....</b>	<b>6</b>
<b>4 Code of conduct and re-committing on a three-year cycle .....</b>	<b>8</b>
<b>5 Safeguarding due diligence .....</b>	<b>9</b>
<b>6 Reporting procedures.....</b>	<b>9</b>
<b>7 General complaints .....</b>	<b>10</b>
<b>8 Further information .....</b>	<b>10</b>
<b>Appendix 2. Due diligence framework .....</b>	<b>12</b>

# 1 Keeping those involved with the Award safe from harm

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- 1.1. **The Duke of Edinburgh's International Award Foundation ('the Foundation') has zero tolerance for harassment or exploitation against Award participants, their communities, Award operators, our partner organisations, staff, or volunteers. Organisations like ours must be held to the highest possible standards of safeguarding.**
- 1.2. The Foundation licenses Award Operators worldwide. Each year, more than one million young people participate in the Award across more than 130 countries and territories. These young people are supported by almost 200,000 adults who mentor Award participants through their Award journey and empower them to develop and support their communities, including other children, young people and vulnerable adults. Keeping Award participants, and those they engage with, safe from harm is the Awards number one priority.
- 1.3. This policy is designed to inform the governance, management and delivery of all Award activities around the world. It stipulates the required standards and methodology for protecting people who come into contact with the Foundation and for ensuring children, young people and vulnerable adults involved in the Award are protected and safe from harm. **It is therefore the safeguarding policy for the Foundation, as well as the policy that licensed Award Operators must adhere to.**
- 1.4. The Foundation and all licensed Award Operators are committed to:
  - I. Ensuring the interests and well-being of children, young people and vulnerable adults are taken into account, in all our considerations and activities, wherever in the world those may be.
  - II. Respecting the rights, wishes and feelings of the children, young people and vulnerable adults with whom we, our licensees and associated organisations work.
  - III. Taking all reasonable practicable steps to protect children, young people and vulnerable adults from neglect, physical, sexual and emotional abuse and to promote their health, wellbeing and human rights.
  - IV. Promoting the welfare of children, young people and vulnerable adults and their protection within a position of trust.
- 1.5. This policy has been developed based on guidance and support materials produced by the UK Government's Department for International Development, UK Charity Commission and the International Keeping Children Safe Standards.
- 1.6. The potential for abuse, harm and violence exists in all countries and all sectors. While we work to mitigate risk and minimise harm, when things go wrong, we expect to be judged on the following:
  - I. the measures the Award and its licensed Operators have in place to prevent abuse or misconduct from occurring;
  - II. the manner in which they respond to an incident of abuse or misconduct; and
  - III. the actions they take to reduce the risk of the incident being repeated.
- 1.7. As a registered charity in the UK, the Foundation is obliged by UK law to report to the UK Charity Commission any serious incident, accident or potential claim that may have an adverse impact on the Award.

## 2 Definitions and principles of safeguarding

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- 2.1. **Safeguarding refers to protecting all people and the environment from all harm, unintended or otherwise. In the context of the Award, it specifically refers to preventing and responding to harm caused by sexual exploitation, abuse, harassment or bullying of any kind. Children, young people and vulnerable adults are at particular risk of harm from exploitation, harassment or abuse and the policy therefore focuses on these groups.**
- 2.2. The aim of this policy, and connected policies and licence agreements, is to minimise the likelihood and impact of these actions on Award beneficiaries and on those working or volunteering for and with the Foundation and/or licensed Award Operators.
- 2.3. The purpose of the policy is to enable all children, young people and vulnerable adults to have the best outcomes from their Award experience, regardless of sex, age, disability, sexual orientation, race, religion or gender reassignment.
- 2.4. The UK Government Department for International Development defines child safeguarding to specifically encompass all forms of harm including physical abuse, sexual abuse, online abuse, child sexual exploitation, neglect and negligent treatment, emotional abuse and commercial exploitation. It covers all children but those who have additional vulnerabilities (for example, children with disabilities, unaccompanied children, refugees, victims of trafficking/modern slavery) will require additional safeguarding considerations.
- 2.5. Based on the UN's guidance, in safeguarding terms a child is defined as any person below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier.<sup>1</sup>
- 2.6. Based on the UK Charity Commission's definition, a vulnerable adult (or 'adults at risk') means any person aged 18 or over who is or may be in need of care and support (e.g. health care, relevant personal care or social care) and is experiencing or is at risk of abuse or neglect and, as a result of those care and support needs, is unable to protect themselves from either the risk or experience of neglect or abuse.<sup>2</sup> In the context of the Award, it is important to note that typically (but not exclusively) vulnerable adults would only be engaged in the Award as beneficiaries where Award participants are volunteering their time to support them.
- 2.7. In the context of the Award, to ensure we can have the highest standards of safeguarding processes and protocols, all children, young people and vulnerable adults should be protected on the basis of the DIFD child safeguarding definition.
- 2.8. **Award participants are aged between 14 and 24. For the purposes of the Award, all Award participants are considered to be either a child or young person when considering how they should be treated in regard to contact with adults.**

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<sup>1</sup> UN General Assembly, *Convention on the Rights of the Child*, 20 November 1989, United Nations, Treaty Series, vol. 1577, p. 2, article 1.

<sup>2</sup> Charity Commission's guidance on safeguarding duties for charity trustees:  
<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#children-adults-at-risk>

- 2.9. Almost 200,000 adults are engaged in Award related activities that bring them into contact, regularly or from time to time, with children, young people and vulnerable adults. These “*Adults in the Award*” include paid staff and volunteers acting as Award Leaders, Adventurous Journey Supervisors, Award Assessors (or equivalent titles) and volunteers in a range of different roles. In the context of the Award, an ‘adult’ volunteer or paid employee is defined as anyone over the age of 16.
- 2.10. Award participants may engage with children, young people and/or vulnerable adults during the course of their Award. In this case, an Award participant, even if aged under 16, must adhere to the standards of conduct described in this policy and expected of an adult engaged in Award related activity.
- 2.11. It is important to note that a child, young person or vulnerable adult may occupy the role of Award participant and *Adult in the Award* concurrently.
- 2.12. The Foundation and licensed Award Operator’s approach to safeguarding are underpinned by the following principles:
- Everyone has a responsibility for safeguarding
  - Do no harm
  - Act in the best interests of the child/young person/vulnerable adult
  - All children, young people and vulnerable adults shall be treated equally, irrespective of race, gender, religion/or none, sexual orientation or disability
  - Safeguarding should be embedded in all of our activities as an organisation

### 3 Safeguarding framework

3.1 The Foundation's approach to maintaining a safe, positive and empowering environment for youth development is encompassed in a safeguarding framework comprising six core areas. This framework is based on guidance from the UK Department for International Development and includes the requirements as stipulated by the Award's international licence agreements. The framework and principles outlined within it are aligned with the UN Convention on the Rights of the Child (UNCRC).

3.2 The framework sets out the key responsibilities and requirements for any licensed Award Operator and can be summarised in the following graphic:



#### 1. General safeguarding and child safeguarding

Safeguarding shapes the approach, practice and culture of the Foundation and all licensed Award Operators, ensuring a comprehensively safe environment for all people who come into contact with the Award, including adults, children, young people and vulnerable adults. All Operators should be able to demonstrate:

- I. Safeguarding policy/policies
  - Must have a child protection policy and/or a vulnerable adults policy in place.
  - If not overt in the policy, must also have bullying, sexual exploitation and harassment and abuse policies. These may be 'stand-alone' policies or part of the organisation's overall HR Manual.
- II. Serious Incident Reporting policy, and associated mechanisms
- III. Appropriate safeguarding training with the national legislation
- IV. A Safeguarding Register

- V. Appropriate investigation processes
- VI. A disciplinary process
- VII. Adoption and use of the Due Diligence Framework (see Appendix 2)
- VIII. Due diligence conducted on downstream partners or funders

## 2. Whistleblowing

Whistleblowing allows concerns to be raised and resolved at the appropriate level. All Operators should be able to demonstrate:

- I. Whistleblowing policy
- II. Appropriate training policy for understanding the process
- III. A complaints process
- IV. Commitment to no reprisals

## 3. Human resources

Recruitment and vetting processes should support recruitment of the right people, and on-going safeguarding training should be provided for all staff and volunteers. All Operators should be able to demonstrate that all that all paid staff, Award Leaders, Adventurous Journey Supervisors, and Award Assessors (or equivalent titles) must:

- I. Have clear job descriptions; including an identified risk level for each role
- II. Have competency-based selection procedures for roles working directly with children/young people
- III. Be 16yrs+
- IV. Be trained, including mandatory safeguarding and whistleblowing training at point of induction
- V. Be appropriately vetted (according to national standards)
- VI. Be aware of and committed to the vision and values of the International Award
- VII. Be compliant with national child protection guidelines and health & safety legislation
- VIII. Conduct ongoing safeguarding and whistleblowing training for staff

## 4. Risk management

A risk management framework must set out the Foundation and Award Operators' approach to risk identification and assessment. All Operators should be able to demonstrate:

- I. Risk management policy; with safeguarding as a distinct risk category
- II. Risk assessments conducted on downstream partners
- III. Adoption and use of the Due Diligence Framework (see Appendix 2, below)
- IV. Risk register, with safeguarding as a distinct category; maintained and regularly reviewed. It should include mitigating actions and identifiable owners for each risk.
- V. Process for escalation of safeguarding risks
- VI. Oversight by a designated senior staff member of the organisation [Designated Safeguarding Lead]



## 5. Code of Conduct

A Code of Conduct describes the ethics and behaviours required of all individuals, to ensure a robust safeguarding environment. All Operators should be able to demonstrate:

- I. Adoption of the Award Code of Conduct (see Appendix 1, below – this is a minimum) by all staff, volunteers and, where applicable, children/young people/vulnerable adults.
- II. An operating environment that supports *Adults in the Award* to adhere to the standards of the Code of Conduct, as a minimum.

## 6. Governance and accountability

The Foundation's Board of Trustees have ultimate responsibility and duty of care for the safeguarding of staff, volunteers and young people who come into direct contact with the Foundation. In addition, the Board have responsibility for ensuring licensed Award Operators comply with this policy.

A licensed Award Operator's Board has ultimate responsibility for the safeguarding of its Award participants, staff and volunteers. It is vital that the Board is independent in its safeguarding decision making. All Operators should be able to demonstrate:

- I. A designated safeguarding lead at Board level
- II. Evidence of regular engagement between the designated safeguarding lead and the management of the organisation; evidence of regular reporting could be a standing agenda item in meetings, or through the regular updates to the risk register

## 4 Code of conduct and re-committing on a three-year cycle

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4.1 The Foundation has published a Code of Conduct with regard to safeguarding, see Appendix 1. It describes what behaviours the Foundation expects of individuals and the organisations to which they belong.

4.2 All *Adults in the Award*, regardless of appointment or role, are expected to adhere to this Code of Conduct (or a variation of) and treat it as a description of a minimum standard of behaviour, recognising that further standards may be required by their own national legislation or policies set by their National Award Operators or their own organisations.

4.3 Every *Adult in the Award*, and every Award participant working with children, young people and vulnerable adults, should be provided with a copy of this Code of Conduct as part of their induction to the Award.

**4.4 It is recommended that, as a minimum, all *Adults in the Award*, re-sign the Code of Conduct and where appropriate take a refresher version of the e-learning safeguarding guidance on a three-year cycle.**

4.5 Organisations that work with Award participants should have appropriate policies and procedures in place to ensure, as a minimum, that they allow adults to comply with the Code of Conduct.

**(If an Award Operator's own policies and procedures - as reviewed and agreed at the time of each licence review - cover these points, provision of those documents meets this requirement.)**

## 5 Safeguarding due diligence

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5.1 The Foundation conducts due diligence when selecting organisations and individuals with whom to partner with and license to deliver the Award. This is based on the licensing application and evaluation process.

5.2 This policy requires Award Operators and individual Award Centres to undertake due diligence when selecting organisations and individuals with whom to partner to deliver Award activity.

5.3 Appropriate due diligence should be carried out under the principle of proportionality. A risk assessment should be conducted to establish appropriate levels of due diligence.

5.4 The due diligence framework (Appendix 2) may be used to structure safeguarding due diligence assessments, alongside and in addition to existing licence requirements.

## 6 Reporting procedures

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6.1 To respond to any incident or incidents of actual, suspected or alleged exploitation, abuse, harassment or bullying that arise:

- I. In the first instance the incident should be reported to the appropriate law enforcement authorities, should that be appropriate.
- II. Necessary immediate actions should be taken to remove any actual or alleged victim from threat of imminent (further) harm.
- III. If applicable, any incident of concern should also be reported in accordance with the Serious Incident Reporting Policy and associated procedures.

6.2 Any contravention of the Safeguarding Policy, or any of the elements of the Safeguarding Framework, should be reported to the respective Operations Director / Manager in the first instance.

6.3 If the incident is serious (as defined by the Serious Incident Reporting Policy) this should be reported to the Foundation's Designated Safeguarding and Serious Incident Reporting Lead.

## 7 General complaints

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7.1 The Safeguarding Policy, and the associated Serious Incident Reporting Policy and serious incident reporting procedure, are independent from and do not affect the Foundation complaints procedure. In the event that a stakeholder wishes to make a complaint to the Foundation in relation to the handling of a safeguarding concern or the response to a concern, the complaints procedure should be pursued independently of the SIR procedure.

7.2 The complaints procedure, as set out in the *International Handbook for Award Leaders* (7<sup>th</sup> ed., 2019) is as follows:

*In the first instance, the complainant and Award Centre or National Award Operator must try to resolve the issue informally.*

*If this cannot occur, the following process should be followed:*

- 1. The Foundation will designate a suitable member of staff to seek a resolution.*
- 2. The designated member of staff will acknowledge and confirm the complaint within 5 working days.*
- 3. The Foundation will seek to resolve the complaint within one month.*
- 4. Any outcome will be provided in writing to ensure that all are correctly informed and that any review or remedial action is carried out.*

*If the complaint is not resolved and the complainant wishes to appeal, final resolution will be coordinated by the Foundation.<sup>3</sup>*

7.3 It should be noted that the above process contains one appeal and does not involve the office of the Chairman of Trustees.

## 8 Further information

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8.1 For further information or to discuss any aspect of this policy, please contact your designated relationship manager at the Foundation.

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<sup>3</sup> The Duke of Edinburgh's International Award Foundation, *The Duke of Edinburgh's International Award Handbook for Award Leaders* (Seventh Edition, 2019), p 121.

## Appendix 1. Code of Conduct

*All adults involved with the Award, as a minimum, must:*

1. Keep to this Code of Conduct at all times.
2. Treat everyone with dignity and respect.
3. Set an example for others to follow.
4. Avoid favouritism.
5. Plan for Award activities to involve more than one other person being present, or at least within sight and hearing of others. This is relevant in all sections of an Award Participant's programme.
6. Follow any supervisory ratios stipulated by their own organisations (and those responsible for a specific Award activity).
7. Respect a person's right to personal privacy.
8. Avoid unacceptable situations within a relationship of trust. For instance, a sexual relationship between an Award leader or assessor and any Award participant, even one who is over the legal age of consent, would be unacceptable.
9. Have separate sleeping accommodation for children / young people and adults and adhere to any further rules on this matter stipulated by their own organisation and/or the organisation responsible for the Award activity.
10. Allow young people to talk about any concerns they may have.
11. Encourage others to challenge attitudes or behaviours they do not like.
12. Avoid being drawn into inappropriate attention-seeking behaviour, e.g. tantrums and crushes.
13. Make everyone (children, young people, parents and carers, Award Leaders, Adventurous Journey Supervisors, and Award Assessors) aware of their own organisation's safeguarding arrangements.
14. Remember this Code of Conduct at sensitive moments, e.g. when helping someone who has been bullied, bereaved or abused.
15. Tell other adults where they are and what they are doing.
16. Remember someone else might misinterpret actions, even if they are carried out with good intention.
17. Take any allegations or concerns of abuse seriously and immediately follow the reporting processes in use within their organisation and, where relevant, the organisation responsible for the Award activity.
18. Never trivialise abuse.
19. Never form a relationship with a child, young person or vulnerable adult that is an abuse of their position of power or influence over the other.
20. Never allow abusive activities, e.g. initiation ceremonies or bullying.
21. Never take part in inappropriate behaviour or contact, whether physical, verbal or sexual.
22. Never take part in physical contact games with children, young people or vulnerable adults.
23. Never make suggestive remarks or threats to a child, young person or vulnerable adult, even in fun.
24. Never use inappropriate language when writing, phoning, emailing or using the internet.
25. Never let allegations, suspicions, or concerns about abuse go unreported.
26. Remember this Code of Conduct when online or using digital methods of communication.
27. Never rely just on their good name, the name of their organisation or the name of the Award to protect them.

## Appendix 2. Due diligence framework

The following template may be used to structure an Award Operator's due diligence procedures in relation to safeguarding generally, and to child safeguarding specifically. A risk assessment should inform whether some or all of the areas listed are required.

<b>DUE DILIGENCE ON GENERAL SAFEGUARDING</b>	<b>SPECIFIC DUE DILIGENCE ON <u>CHILD</u> SAFEGUARDING</b>
<b>These questions are based on the International Keeping Children Safe Standards.</b>	
<b>Safeguarding</b>	<b>Child Safeguarding</b>
Do you have a safeguarding policy?	Does the organisation have a written child protection (safeguarding) policy to which all staff and associates, including partners, are required to adhere?
Does the policy include a statement of your commitment to safeguarding, including a zero tolerance statement on bullying, harassment and sexual exploitation and abuse?	Is the policy clear that all children have equal rights to protection and that some children face particular risks and difficulties in getting help, because of their ethnicity, gender, age, religion, disability or sexual orientation?
Do you keep a detailed register of safeguarding issues raised and how they were dealt with? Do you treat historical allegations separately and differently from current disclosures?	Is the definition of a child in the policy any person under the age of 18?
Does your recruitment policy include a criminal background check on candidates? In particular, specifically where the programme would involve working with children or vulnerable adults.	Has the policy been publicised and communicated to children and caregivers?
Do you share your safeguarding policy with partners?	Does the policy address safeguarding children from harm through misconduct by staff, volunteers, associates and others, from poor practice, and from its operational activities?
Do you have a designated senior safeguarding officer who reports regularly to the senior leadership and Board?	Does the organisation have internal processes to address child protection concerns appropriately?
Do you provide mandatory training on safeguarding to new trustees/staff/volunteers within a suitable and appropriate timeframe of them joining your organisation?	Has the organisation conducted a mapping exercise of local child protection services and child safeguarding risks? For example, if a serious child protection (safeguarding) issue is reported, does the organisation know when this

	should be reported to relevant authorities (e.g. police, social welfare)?
Do you provide regular (mandatory refresher training on safeguarding to staff/volunteers?	
<b>Whistleblowing</b>	
Do you have a whistleblowing policy which protects whistle-blowers from reprisals and includes clear processes for dealing with concerns raised and by whom and the timelines involved?	Do staff and volunteers know how to report a child safeguarding concern?
Do you provide mandatory training on whistleblowing to new trustees/staff/volunteers within a suitable and appropriate timeframe of them joining your organisation?	Are there child-friendly reporting mechanisms in place with clear step-by-step guidance on how to report safely and where to get help?
	Is there a mechanism to report anonymously?
	Are staff and volunteers trained in receiving disclosures and allegations from children and able to communicate in a child friendly manner with children, especially when conducting investigations?
	Are investigation procedures appropriate for children (so that children are not re-traumatised by the process and the 'every action should be in the best interest of the child' principle is upheld)
<b>HR, Recruitment and Selection</b>	
Do you have different levels of recruitment and security checks commensurate with safeguarding requirements of the role?	Does the organisation designate key people at different levels (including senior level) as "focal points" with defined responsibilities to champion, support and communicate on child safeguarding and for effective operation of the child safeguarding policy?
Does your recruitment process consider and evidence the level of safeguarding risk in a job role?	Do recruitment processes have child safeguarding checks in place? Recruitment adverts, interviews and contracts all outline a commitment to child safeguarding and make clear staff roles and responsibilities regarding child safeguarding, such as mandatory reporting?
Does your HR. policy depict a well-planned interview process?	Does staff and volunteers induction and training include specific material on safeguarding needs

	of children, risks, types of abuse and barriers to reporting faced by children?
Do interviewers have the relevant experience and knowledge of current safeguarding practices?	
If the role is for those working directly with vulnerable groups then does your policy include specific questions in the interview that draw out people's attitudes and values in relation to the protection of children and/or vulnerable adults?	
Do you require up to two references including from previous employers or others who have knowledge of the candidate's experience and suitability to work with children?	
Does your policy require that background checks should be carried out for all prospective employees?	
Do you make use of probationary periods of employment to ensure suitability once in post?	
<b>Risk Management</b>	
Do you have a risk management policy or framework capturing risk appetite and risk categories including safeguarding?	Are there specific risks and mitigating controls identified to protect children that come into contact with programme staff, operations and downstream partners?
Do you share your risk management policy where it relates to safeguarding risks with your downstream partners i.e. are downstream partners advised on escalation procedures around safeguarding issues?	Are they reflected on programme risk registers with risk owners recorded?
Do you have risk registers for all programmes that feed into an overall organisational risk framework?	
Is there regular senior oversight of your risk register?	
If applicable - are fundraising ideas and external communications risk assessed to ensure no harm is done by the activity? E.g. Fundraising is delivered in the context of safeguarding e.g. 'sponsorship'	

<b>Codes of Conduct</b>	
Does the organisation have in place a Code of Conduct for staff and volunteers that sets out clear expectations of behaviours – inside and outside the workplace – and what will happen in the event of non-compliance or breach of these standards?	Does the organisation have a Code of Conduct for working with children, including at events, which all staff and associates need to adhere to on taking up employment?
Does the code of conduct prioritise the wellbeing and care of all people including beneficiaries?	
Are all staff and volunteers provided with training on the code of conduct as part of their induction?	
Are there policies and practices for the management of downstream partners and affiliates aligned to the Code of Conduct?	
<b>Governance and Accountability</b>	
Does the governance structure reflect regular review of management of safeguarding issues internally and externally?	Does the governing body understand where the organisation comes into contact with children and the risks involved; and is there a formal system of reporting to the board to track progress and performance on child safeguarding, including information on cases?
Do you have a designated safeguarding officer at board level who is responsible and accountable for safeguarding standards and reporting across the organisation and also includes downstream partners approach to safeguarding?	Are children and care givers consulted in the design, development and monitoring of safeguarding measures? Are beneficiary feedback mechanisms in place and are they tailored towards child-friendly feedback?
Are your beneficiaries actively involved in any of the governance structures of the organisation and/or specifically within programmes which affect them and their communities?	
Do your downstream partners have in place procedures to ensure safeguarding issues are escalated to the Board?	