SAFEGUARDING POLICY AND PROCEDURE MANUAL
REVIEWERS & APPROVALS
This document has been reviewed and approved by the undersigned.

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OWNERSHIP/CUSTODIAN OF THE POLICY

This policy document is vested in the Chief Executive Officer (CEO), Chief Operating Officer (COO) and Human Resources Manager (HRM) who have overall responsibility for its implementation in line with the Afrobarometer (AB’s) legal and ethical obligations; monitoring its effectiveness and dealing with queries with regard to its interpretation.

Supervisors at all levels are responsible for ensuring their direct reports are made aware of the policy and adequately trained on its application.

It shall be subject to review every three (3) years or as required in order to keep it up to date with changes to relevant regulations or best practice. All suggestions for review and or amendments shall be forwarded to either the CEO, COO or HRM for review, including obtaining Management/Board approvals of the amended policy.

DISTRIBUTION LIST
A current version of this document is available to staff on the google drive labelled Policies and on AB website.
INTRODUCTION
AFROBAROMETER (hereafter referred to as “AB”) acknowledges that all persons (both adults and children) regardless of their color, age, race, religion, creed, gender, disability, socio-economic status, disability, politics, or ethnic origin have a right to be protected from all forms of abuse, neglect, and exploitation.

This policy shall be used by network members including employees of AB and partner staff who work with interns, volunteer workers, children, adults in vulnerable situations, and adults at risk within AB and within organizations that provide services to AB including partner institutions. The AB Ways of Working Document, which is provided to all staff in employment, also clearly stipulates the organization’s abhorrence of violence (which includes physical and mental violence, injury and abuse, maltreatment, and sexual abuse) against any of its employees, interns, volunteer workers, adults in vulnerable situations, and adults at risk. This policy aims at expanding on relevant articles in the Ways of Working Document to make it easily understandable and implementable. Practicing safeguarding as a policy is very important to the work that AB does. The policy seeks to scrutinize the internal practices of AB and develops measures to safeguard staff and other stakeholders with whom the organization has contact.

It is the responsibility of the Central Management Team and managers of AB to ensure the delivery of this policy and to promote it as relevant in all aspects of the work of AB, to hold all to account, and to help create a safe work environment for all.

Definitions
1. A child is any person under the age of 18 years. This definition is reflective of international best practices and adopted in the Children’s Act, 1998 (Act 560).
2. Adults in vulnerable situations are persons over 18 years with some form of physical and/or mental disability.
3. Staff includes all persons within the network supporting AB in delivering its goals.
4. Associates, affiliates, interns, and volunteers are any persons in a formal work relationship with AB, either remotely or otherwise.
5. Partners are persons or organizations collaborating with AB on the project and research activities.
6. Beneficiaries are persons who are directly at the receiving end of interventions undertaken by AB. They may also include persons who participate in any programs and events that are organized by AB.
7. Safeguarding is a process of protecting all those persons associated with AB from abuse and neglect, including physical, mental, sexual, emotional, or economic abuse and neglect.
8. Adult at risk is any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, or may be unable to protect themselves due to age or
illness, or who may be unable to take care of themselves or unable to protect themselves against significant harm or serious exploitation.

**Types and Definition of Abuse**

AB recognizes that child and adult abuse can take various forms and may include the following:

1. **Physical abuse** – an assault or attack on a person, including but not limited to hitting, slapping, pushing, kicking, unlawful or inappropriate restraint, and inappropriate physical sanctions.
2. **Sexual abuse** – an unsolicited sexual activity or behavior that happens without consent or understanding, including harassment, inappropriate body contact, and sexually enticing comments.
3. **Psychological abuse** – emotional abuse that causes distress, discomfort, disgrace, embarrassment, trauma, or emotional pain. This form of abuse can be verbal and/or non-verbal.
4. **Financial and material abuse** – includes theft, fraud, exploitation, and pressure in connection to wills, property, inheritance, and financial transactions, or inciting an adult at risk to do any of these things on another individual’s behalf; it may also involve the misuse or misappropriation of property, possessions, and benefits of an adult at risk.
5. **Discriminatory abuse** - includes abuse based on an individual’s race, gender, disability, faith, sexual orientation, or age, as well as other forms of harassment, slurs, or similar treatment or hate crime/incident.
6. **Neglect or self-neglect** - includes a wide range of behaviors such as neglecting to care for one’s own personal hygiene or health.
7. **Domestic abuse** – any incident or pattern of incidents of controlling, coercive, or threatening behavior, violence or abuse of persons who are, or have been, intimate partners or family members, regardless of gender or sexuality.

**POLICY STATEMENT**

**Safeguarding Principles**

AB shall ensure that the following principles are respected:

1. The rights of all children and adults shall be respected regardless of their cultural, religious, political, ethnic, or geographical backgrounds.
2. All of AB’s actions shall take into account the interest of children and, adults in vulnerable circumstances and adults at risk.
3. All staff, affiliates, associates, etc. shall prevent the occurrence of rights violations and/or report immediately to the appropriate quarters any observed incident.
4. AB shall not put any staff, project beneficiary(ies), etc. in a work situation that comprises or poses risks to their personal safety and security.
5. All allegations or concerns of neglect or abuse shall be treated with seriousness, and AB shall take all necessary steps to investigate and take appropriate action.
6. AB shall commence a preliminary investigation into reports of abuse, harassment, or rights violations within 48 hours of becoming aware of such reports, and shall report findings within seven days. Fair hearing will be given to all affected employees.

7. AB shall promote awareness so that all staff, stakeholders, etc. shall play their part in preventing, detecting, and responding to issues of abuse.

8. AB shall promote safeguarding of adults at risk by valuing, listening to, and respecting them.

9. All staff shall receive training in relation to safeguarding adults and children at a level commensurate with their role.

10. AB shall not knowingly recruit staff, volunteers, or other representatives to roles in which they pose a known risk to the safety or well-being of adults at risk.

This policy impacts all employees of AB regardless of level, location or function.

**Policy Commitment**

The Central Management Team (CMT) of AB shall have direct overall accountability for the implementation of the Safeguarding Policy.

Managers and Heads of Departments are responsible for ensuring that staff in their departments and units are made aware of the policy, and that everyone complies with it. The Board shall be responsible for the review and update of the policy every year and it shall be done in line with the organizational changes and be held accountable for AB’s Safeguarding of staff.

All staff and other stakeholders, such as field research assistants, resource persons, translators, volunteers, etc., shall be required to adhere to this policy, to AB standards and expectations for the workplace, and to the regulations in the Ways of Working Document at all times.

Staff of AB are advised to report any suspicions of abuse of vulnerable employees. Failure to report the suspicion of abuse in connection with a colleague to relevant persons amounts to a breach of AB’s policy on safeguarding and shall lead to disciplinary action.

**Support for Survivors and Victims**

Support will be offered to survivors or victims of abuse regardless of whether an internal investigation has been carried out or not. This support can include special psycho-social counseling and access to other specialists and appropriate support needed. Survivors and victims of abuse can decide on whether they would like to take up the support options available to them.

**Safeguarding Programming at AB**
AB recognizes that it is possible to inflict unintended harm, especially on vulnerable employees. Due to this, this policy has in place minimum standards intended to minimize the risk when working directly or indirectly with adults at risk and children.

SAFEGUARDING PROCEDURE

How to Respond to a Complaint or Concern
AB shall commit itself to responding to all complaints of abuse. A Safeguarding Team will be put in place to handle all concerns or complaints of abuse. The Safeguarding Team will be made up of employees with expertise in prevention, carrying out investigations, and delivering support to survivors of and victims of abuse. The Safeguarding Team shall always take immediate protection action if there is any urgent vulnerable protection situation where an adult at risk or a child is in danger of imminent abuse.

What to Do If You Have Concerns About a Vulnerable Adult Well-being
1. The immediate safety and welfare of the vulnerable adult should be the priority.
2. Do not say or show that you are shocked.
3. Do not express doubts about the legitimacy of the concern.
4. If a vulnerable adult reports abuse to you, ask questions that will help you get more information to understand the complaint.
5. Inform other staff of the danger in which a vulnerable adult finds himself or herself; do not keep it a secret.
6. Do not challenge parents, carers, teachers, etc. with your concerns for a vulnerable adult at risk.
7. Details that support your concerns or suspicions must be recorded first and subsequently reported in line with internal reporting procedures.

Confidentiality
Staff of AB cannot keep information involving children and adults at risk to themselves. Information received in confidence from AB staff that relates to an adult at risk shall be treated strictly confidential.

How to Raise a Complaint or Concern
Any staff member can make complaints in oral or written form to the Human Resources Manager or the Safeguarding Team about what they have experienced or witnessed. The Team can be contacted through their leader or through the Human Resources Unit. For instance, if an allegation of abuse is made against an employee, you must inform your manager immediately, and you must create a signed and dated record of details that you know and send copies to the Human Resources Manager and the Safeguarding Team. The accused staff will be treated with respect, and the allegations will be kept in confidence.

Safeguarding Team
The Safeguarding Team shall consist of the Human Resources Manager and two other persons appointed by the Central Management Team to serve for a period of two years. These persons may be reappointed after serving their term of appointment.

Procedure for Handling Complaints
Complaints raised by adults at risk must be referred to the Safeguarding Team within two days of receipt.

Internal Response
1. The Safeguarding Team must convene a case conference or meeting within 72 hours of receiving a complaint from an adult at risk.
2. A reply should be sent to the complainant to acknowledge receipt of the complaint on the same day.
3. The procedure for addressing complaints shall be the same as the AB internal grievance procedure.
4. Staff involved in the complaint must maintain strict confidentiality.

Retaliation Against Complainants, Victims, and Witnesses
AB takes a serious view of retaliation. Disciplinary action will be taken against any employee who seeks to carry out a retaliatory action against complainants, victims, or witnesses.

Outcomes of Misconduct
Staff who do not abide by the Safeguarding Policy shall be subjected to disciplinary action, which may include dismissal.

False Allegations
If a staff member raises allegations that he or she knows to be false, such an employee will be subject to disciplinary action up to and including termination of employment.

Complaint Against AB Partners
Any AB partner accused of abusing an employee shall be asked to respond to the complaint within 24 hours.

If necessary, AB will solicit the services of an independent investigator to investigate the abuse of a vulnerable adult.

If a partner deals inappropriately with an allegation of abuse of a vulnerable adult, AB must consider withdrawing funding or pulling out of the relationship.

Receiving External Complaints and Concerns
Complaints raised from outside AB shall be referred to the AB Safeguarding Team, which must adhere to the AB policy and procedures.

Safe Recruitment
AB application forms, interviews, and references should address safeguarding and equality requirements and attitudes in line with the recruitment policy.

All applicants recruited to supervisory positions shall follow the following guidelines:

1. Applicants must disclose all criminal convictions in keeping with the parameters of the employment law.
2. Volunteering opportunities shall not be offered to anyone with spent or unspent convictions for sexual offences or any form of adult abuse.
3. Checks will be done to find out whether applicants applying for certain roles are known risks to adults at risk.
4. Reference checks and other checks must be done before applicants start work.

Engaging Children and Adults at Risk as Volunteers
It is mandatory that when engaging adults at risk, the Human Resources Manager makes them aware of the existence of the Safeguarding Policy. Also, adults at risk shall be given copies of the Safeguarding Policy to enable them to become conversant with it.

Health and Safety
All relevant health and safety checks shall be done before taking on an adult at risk as AB staff.

Supervision of Children and Adults at Risk
Constant supervision is critical in order to safeguard adult-at-risk applicants in the care of AB.

1. Adults at risk must not be left alone in a property at any time.
2. There should be constant supervision and monitoring when an adult at risk is volunteering; supervision should be the responsibility of the adult at risk’s supervisor for the duration of the volunteer work.
3. If an activity is identified as high risk in the health and safety assessment, the adult at risk should have constant supervision.
4. Adults at risk should be informed of who is responsible for their safety and how to raise concerns during their induction.
5. Appropriate supervision arrangements must be clearly defined in advance with each adult at risk’s supervisor.

Use of Personal Data About Children and Adults at Risk
All information gathered by AB about adults at risk shall be processed in accordance with AB’s Data Protection Policy.

Research on adults at risk must be well thought through, and special attention must be given to AB’s procedures for Safeguarding Policy and AB’s Data Protection Policy. Special attention should be given to the process for gathering content about adults at risk, how the identity of adults at risk can be protected, how to share and store such content, and how to achieve informed consent.
Disputes about the use of images of adults at risk in AB’s work must be addressed to the AB Safeguarding Team for discussion and further action.

**Training**

All employees shall be trained on safeguarding adults at risk. The training will be carried out by specialists on a regular basis and will include information about AB policy positions, reporting and investigation procedures, and how to embed adult safeguarding across the AB network.

Managers are to ensure that all staff receive regular training and messages about safeguarding. Adults at risk require training to ensure that their competences are at the level where they can operate without putting themselves and others at risk.

**Key Contact Persons**

- Joseph Asunka (CEO) - jasunka@afrobarometer.org
- Felix Biga (COO) - fbiga@afrobarometer.org
- Kwaku Owusu-Yeboah (HRM) - kowusu@afrobarometer.org or transparency@afrobarometer.org.