



The Theatre for a Change Malawi Child and Adults at Risks Safeguarding Policy

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Introduction

Theatre for a Change (TfaC) Malawi is committed to providing a safe and supportive environment in its work with children and adults at risks.

This Safeguarding Policy is a Statement of Intent that demonstrates our commitment to safeguarding children and adults at risks from harm and makes clear to all what is required in relation to the protection of everyone. This policy aims to protect children and adults of whatever race, gender, religion, disability, sexual orientation, social background and culture from intentional and unintentional harm and all forms of abuse whilst in the care of Theatre for a Change staff and volunteers, as well as other partner organisations that we work with.

In order for our work to uphold and strengthen the rights of children and adults at risk we work with, we recognise that we have a duty of care to these groups, and have developed the following standards of care, which have been reviewed and approved by our Board of Directors.

Aim

The aim of this Safeguarding policy is to promote good practice by:

- Providing ALL children and adults at risk, whatever race, gender, age, religion, disability, sexual orientation, social background and culture with appropriate safety and protection whilst in the care and supervision of TfaC Malawi board members, employees, workers, consultants, volunteers and representatives.
- Allowing all TfaC Malawi board members, employees, workers, consultants, volunteers and representatives to make informed and confident responses to specific safeguarding issues through support in legal, health, psychosocial and safety matters.
- Ensuring safeguarding of TfaC Malawi board members, employees, workers, consultants, volunteers and representatives from abuse, harassment and bullying.

Definitions

- Safeguarding refers to institutional and internal safeguarding policies and procedures intended to protect children and adults at risk from harm and abuse through their contact with the organisation, its staff and their participation in programs and projects.
- Child protection is part of safeguarding and refers to the specific action taken to protect a child when that child has been abused or is in immediate risk of harm.
- A child is defined as anyone who is under 18 years of age.

- ‘Adult at Risk’ or ‘Vulnerable Adult’ refers to a person 18 years or over who is, who is, or may be in need of, community care services by reason of mental or other disability, age or illness; and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation, as well as other factors contributing to risk include unequal power dynamics, socio-economic status and gender. These factors may be intersectional in their impact on risk.
- Abuse can be understood as:
 - Physical
 - Domestic violence
 - Sexual
 - Psychological or emotional
 - Neglect or acts of omission
 - Financial or material
 - Modern Slavery
 - Discriminatory
 - Organisational or institutional
 - Self-neglect (including hoarding)

Specific examples of abuse can be found at **Appendix A**.

Scope of this Policy

This policy applies to all TfaC Malawi board members, employees, volunteers, freelance and seasonal workers, and organisations with whom Theatre for a Change Malawi may be working in partnership. It relates to all children and at-risk adults, but particularly those with whom Theatre for a Change Malawi comes into contact directly or indirectly.

In our work in Malawi and in international contexts, the term ‘child’ or ‘children’ refer to young people under 18 years of age.

Although this document outlines working practices for TfaC Malawi board members, employees, freelance, seasonal workers and volunteers whilst working with children and vulnerable adults, it also relates to their non-work-related personal conduct. Any inappropriate conduct related to abuse of children or at-risk adults outside work will be considered most seriously and appropriate action will be taken dependent on the situation.

Equity

All children and adults are at risk of abusive relationships, and some are particularly vulnerable. TfaC Malawi exists to empower people who as a result of their economic, social or cultural status, gender, religion, sexual orientation or physical disabilities are placed at risk of abusive relationships.

All our policies and practices must reflect the right of all staff and participants in the work to absolute equity with regard to their human rights. Any behaviour which is discriminatory, offensive or violent will not be tolerated and complaints will be acted upon.

Values and Principles

In all work with children and adults at risk, TfaC Malawi will ensure that the welfare and security of the child/adult at risk is paramount and that we constantly strive to provide an environment which promotes their human rights and which is free from abuse. This is achieved both explicitly as part of the curriculum of training in our methodology and through the implementation of appropriate policies and guidelines.

We value and will respond promptly and constructively, to all information presented by children, adults at risk, or third parties regarding their safety and welfare.

Sexual Harassment, Exploitation, and Abuse (SHEA) Statement

TfaC Malawi values a safe working environment free from sexual harassment, exploitation, and abuse. TfaC Malawi operates a zero-tolerance policy for any form of sexual harassment, exploitation, and abuse at work carried out by any member of TfaC or representative. This applies to everyone irrespective of race, age, gender, gender identity, sexual orientation, culture, dress, language, political affiliation, health status, class, caste, ethnicity, marital status, disability, location, pregnancy, and religion.

This provides guidance and direction to anyone associated with TfaC so that:

- TfaC Malawi board members, employees, workers, consultants, volunteers and representatives understand the importance of preventing sexual harassment, bullying, exploitation, and abuse, and their responsibility to ensure that they and their work do not deliberately or inadvertently cause harm to staff and other representatives.
- TfaC Malawi board members, employees, workers, consultants, volunteers and representatives understand their role in preventing sexual harassment, bullying, exploitation, and abuse, and the consequences of breaching this policy.

- All TfaC Malawi board members, employees, workers, consultants, volunteers and representatives understand their responsibility to report any concerns relating to sexual harassment, bullying, exploitation, and abuse, and have access to clear guidelines on how to report suspected harassment.
- All organisational processes and structures reflect our duty of care towards each other as staff and other representatives and put in place safeguarding procedures in every aspect of our work so that we build a culture free from sexual harassment, bullying, exploitation, and abuse.
- TfaC Malawi commits to uphold the highest level of personal and professional conduct amongst its trustees, staff, volunteers, partners and other representatives working in or visiting all programming contexts, and particularly humanitarian settings, ensuring zero tolerance of all forms of sexual harassment, bullying, exploitation, and abuse.

Confidentiality

TfaC Malawi will ensure access to confidential information is restricted to the appropriate TfaC Malawi staff and, if appropriate, to board members and the relevant external authorities.

Procedures and Systems

Responsibilities

The implementation of this policy is mandatory across the full scope of TfaC Malawi's work, and specific responsibilities are outlined below. All employees, as part of their contract, are expected to operate within codes of conduct outlined within the policies that support the work of Theatre for a Change. Any behaviour by a member of staff towards children or adults at risk that contravenes the terms of the Safeguarding Policy will be subject to disciplinary action, which in turn may lead to dismissal.

The Executive Director must review this policy on an annual basis and submit it to the board for approval. All TfaC Malawi board members, employees, consultants, volunteers and active representatives must sign to say they have understood it.

Responsibilities of the board members

The TfaC Malawi board members are ultimately responsible for the implementation of its Safeguarding Policy. As a result, board members must:

- Understand and review the safeguarding risks at TfaC Malawi. They must ensure safeguarding risks are recorded in the risk register and reviewed quarterly. They must review safeguarding reports as submitted by the Executive Director, Human Resource Manager and the Programmes Coordinator on behalf of the Safeguarding and Protection team.
- Ensure TfaC Malawi has the right policies and procedures for safeguarding. They must make sure they are public and are used.
- Make sure that safeguarding is a key priority for TfaC Malawi as part of good governance. This includes having the right roles in place and adopting the right practices.
- Understand when it is appropriate and legal to carry out background checks on employees and volunteers, and put in place other measures to ensure they carry out their roles safely.
- Make sure staff and volunteers have appropriate training and review this annually.
- Ensure anyone involved in TfaC Malawi understands how to recognise, respond to, record and report a safeguarding concern.
- Ensure that all safeguarding interventions are well resourced.

Responsibilities of the management team

The UK Executive Director and TfaC Malawi's Operations and HR Manager are responsible for:

- Ensuring that safeguarding risks and issues are constantly reviewed and appropriate actions implemented across the geographical scope of the work of Theatre for a Change.
- Considering and authorising any immediate changes in operational policy required due to a safeguarding incident.
- Ensuring that safeguarding is considered in all appointment of staff including freelance and volunteers.
- Supporting managers and staff with advice on safeguarding issues and advising Directors and Project Management Committees regarding decisions and actions to be taken in any safeguarding situation.
- Keeping and monitoring central records of all safeguarding cases.
- Ensuring that all staff receive necessary training, both as a central part of induction and on quarterly basis, and that they are able to discuss safeguarding issues confidentially and receive support and guidance as situations arise. An open and responsive management culture is essential if TfaC Malawi is to safeguard children and vulnerable adults and support staff effectively.

Raising and Reporting Safeguarding Issues

Everyone working within TfaC Malawi can play an important part in promoting the safety and protection of young people and adults at risk with whom they are working, and fellow employees. Employees must raise all cases of suspected or alleged child abuse, safeguarding incidents, and employee complaints of bullying or harassment, in line with the procedures identified in the following steps.

Key steps in protecting children and adults at risk

Step 1: Recognise possible abuse

You identify that an individual has been abused, or is at risk of being abused either because:

- an individual tells you that they have been abused,
- someone tells you that an individual is being abused,
- you suspect that an individual might be abused as a result of physical or behavioural signs, or,
- you suspect an individual is at risk of abuse as a result of lack of recognition, support and safeguarding for that individual.

Step 2: Respond appropriately

In responding to disclosures of abuse, it is important to always remember that:

- Suspected abuse must be treated seriously and reported.
- When a child discloses abuse, particular care should be taken to ensure that the child or adult at risk has the support they need upon making the disclosure.
- When responding to a disclosure:
 - React calmly.
 - Reassure them that it is not their fault.
 - Remind them that there are reporting procedures at Theatre for a Change UK that you have to adhere to, and that you may not be able to keep this to yourself.
 - Listen carefully.
 - Clarify what you have heard.
 - Explain what you will do next.

Step 3: Report your concerns

- Follow the steps in reporting procedures as outlined below.
- Do not delay.
- Be aware of mandatory reporting requirements.
- Consider the best interests of the child or adult at risk when deciding where to report.
- **Confidentiality** is key. It is equally important to let the individual know when confidentiality may be broken. In addition, the child or adult at risk must participate in the decision-making process, taking into account their age and capacity. Adult consent must always be sought before disclosure externally.

Step 4: Record your observations

- You must make a record of what you have seen, heard and what you have done with your concerns.
- Respond to the immediate needs of the person if it is a direct disclosure or you suspect the person may be at immediate risk. Then record everything you can as soon as possible.
- When recording an observation:
 - Record all actions and decisions.
 - Be clear, concise, accurate and up to date.
 - Separate fact from fiction.
 - Record the exact words used.
 - Record consent to share information.
 - Share recorded information on a need-to-know basis.

Remember that your record may be used as evidence and to determine outcomes.

Remember the Four Rs - Recognise, Respond, Report, Record.

Steps in Reporting Abuse of Children

SCENARIO A: ARE YOU RESPONDING TO A DISCLOSURE OF CONCERN/ALLEGATION?

- a) Have you received a disclosure about or from a child that needs immediate action, or you have assessed and observed that a child is at significant risk of harm?
- b) Is there evidence that is consistent with abuse and unlikely to have been caused in any other way? This evidence could be:
 - In form of injury or behaviour
 - Consistent signs that a child is suffering from emotional or physical neglect
 - An account from a person who saw the child being abused

If you answered **YES** to a) or b)
GO TO STEP 1

If you answered **NO**, **GO TO SCENARIO 2.**

SCENARIO B: DO YOU HAVE REASONABLE GROUNDS FOR CONCERN?

- a) Is a child saying or indicating by other means that he or she has been abused?
YES/NO
- b) Admission or indication by an adult or a child of an alleged abuse they committed?
YES/NO
- c) Are you in doubt of a child's safety or parent's ability to protect a child? **YES/NO**

If you answered yes to a) or b) or c)
GO TO STEP 1.

If you answered yes to the above questions and you are not sure of what to do
GO TO STEP 2.

If you answered no, then no action is required.

STEP 1: REPORT

Make sure you have obtained relevant facts and:

- a) In cases of **physical or sexual abuse**, you **MUST** support, signpost or refer the child to health care as a **PRIORITY**
- b) You **MUST** report to a child protection worker/officer or the police as soon as possible. A decision on who to report to **MUST** be made based on safety and the best interests of the child.
- c) Inform the child's parents or caretakers **ONLY** if it is safe and in the best interests of the child.
- d) If you are unsure of what to do **GO TO STEP 2.**
- e) You **MUST** report to the project Safeguarding Focal person or Line Manager or with **24 hours**.

STEP 2: ASSISTANCE IN REPORTING

- a) If you need any assistance on how to respond or report a case, speak immediately to the project Safeguarding Focal person or your Line Manager.
- b) If your report involves a TfaC employee, anyone working on behalf of TfaC, a TfaC partner or TfaC board member: you can also report (and maintain your anonymity if you choose) using **TfaC's Whistleblowing procedure**. Under this policy you can also report to the Head of Operations or TfaC UK's Executive Director.

STEP 3: FOR LINE MANAGERS / PROJECT SAFEGUARDING FOCAL PERSONS

- a) ALL suspected child protection concerns **MUST** be reported to the Project Safeguarding Focal Person with **24 hours** of receiving the report/raising the concern.
- b) ALL suspected child protection concerns **MUST** be followed-up **within 24 hours** of receiving the report/ raising the concern.



Steps in Reporting Abuse of Vulnerable Adults

SCENARIO A: ARE YOU RESPONDING TO A DISCLOSURE OF CONCERN/ALLEGATION?

- a) Have you received a disclosure from or about a vulnerable adult that needs immediate action, or you have assessed and observed that a vulnerable adult is at significant risk of harm?
- b) Is there evidence that is consistent with abuse and unlikely to have been caused in any other way? This evidence could be:

- In form of injury or behaviour
- Consistent signs that a child is suffering from emotional or physical neglect
- An account from a person who saw the child being abused

If you answered **YES** to a) or b)

GO TO STEP 1

If you answered **NO**, **GO TO SCENARIO 2.**

SCENARIO B: DO YOU HAVE REASONABLE GROUNDS FOR CONCERN?

- a) Is a vulnerable adult saying or indicating by other means that he or she has been abused? **YES/NO**
- b) Admission or indication by an adult of an alleged abuse they committed? **YES/NO**
- c) Are you in doubt of a vulnerable adult's ability to protect themselves? **YES/NO**

If you answered yes to a) or b) or c)

GO TO STEP 1.

If you answered yes to the above questions and you are not sure of what to do

GO TO STEP 2.

If you answered no, then no action is required.

STEP 1: REPORT

Make sure you have obtained relevant facts and:

- a) In cases of **physical or sexual abuse**, you **MUST** support, signpost or refer the vulnerable adult to health care as a **PRIORITY**.
- b) You **MUST** discuss and agree with the vulnerable adult what support and action **they** would like to take.
- c) If there is an immediate danger to life or a crime has been committed, you are **required to report** to the Department of Social Welfare or the police. **Gain consent** from the adult wherever possible and consider their **best interests**.
- d) If you are unsure of what to do **GO TO STEP 2.**
- e) You **MUST** report to the project Safeguarding Focal person or Line Manager or with **24 hours**.

STEP 2: ASSISTANCE IN REPORTING

- a) If you need any assistance on how to respond or report a case, speak immediately to the project Safeguarding Focal person or your Line Manager.
- b) If your report involves a TfaC employee, anyone working on behalf of TfaC, a TfaC partner or TfaC board member: you can also report (and maintain your anonymity if you choose) using **TfaC's Whistleblowing procedure**. Under this policy you can also report to the Head of Operations or TfaC UK's Executive Director.

STEP 3: FOR LINE MANAGERS / PROJECT SAFEGUARDING FOCAL PERSONS

- a) ALL suspected vulnerable adult abuse concerns **MUST** be reported to the Project Safeguarding Focal Person with **24 hours** of receiving the report/raising the concern.
- b) ALL suspected vulnerable adult concerns **MUST** be followed-up **within 24 hours** of receiving the report/ raising the concern.

Key notes for reporting

- When a child discloses abuse, particular care should be taken to ensure that the child has the support she/he needs upon making the disclosure.
- **ALWAYS** observe the guiding principles of **confidentiality, safety, respect, dignity and the best interests** of the individual.
- **ALL** suspected child protection concerns **MUST** be reported to either a community child protection worker/officer or the police. A decision on who to report to, when and how **MUST** consider the safety and best interests of the child to reduce additional harm. **DO NOT** report, signpost or refer to people/services if there is a risk the child may be placed in further harm
- Where possible, dependent on age and maturity, young people should participate in decisions on the reporting process. For adolescents their consent **MUST** be sought before reporting to the police.
- For adults their consent **MUST** be sought before reporting externally. Where there is an immediate danger to life, or a crime has been committed - reporting to the Department of Social Welfare or the police is required. However, their consent **MUST** be sought before reporting to the police.
- For reports of sexual or physical assault (including rape), the **PRIORITY** is health care. For rape and sexual assault- support, refer or signpost the child to access free healthcare (within 3 days for HIV prevention and within 5 days for emergency contraception and treatment of physical injuries). If available a One Stop Centre is the best referral option. **DO NOT** report, signpost or refer to people/services if there is a risk the individual may be placed in further harm.

How to report:

- Reports **MUST** be made within **24 hours**.
- **ALL** suspected and reported cases **MUST** be reported to the Head of Operations/ HR or the Safeguarding Manager **within 24 hours**.
- Please complete and email a digital copy of the 'Reporting Form' (see **Annex B**) to the Safeguarding and Protection Manager or HR Manager.
- The form can be sent a) via email or b) as a photo via text of WhatsApp.
- If for whatever reason you cannot complete or send the form, please phone, text, WhatsApp or email the Social Protection Manager, HR Manager or the Executive with as much information as you can.
- If you do not have all the information – still submit your report within 24 hours.

- For contact details of The Executive Director, Social Protection Manager and The Head of Operations/ HR – please see **Annex C**.

Confidentiality Issues

At the earliest opportunity remind the child or adult at risk that you may not be able to keep this information to yourself, and that you may have to report it to your line manager for their protection.

Information held internally by Theatre for a Change Malawi will be stored in a secure place with limited access to designated people.

Whistleblowing (Public Interest) Policy

Employees who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. Employees raising concerns or reports *can choose to remain anonymous*.

TfaC Malawi recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with.

This policy is designed to provide guidance to all those who work with or within TfaC Malawi (including any casual or temporary staff) who may from time to time feel that they need to raise certain issues relating to TfaC Malawi with someone in confidence.

Any person who in the public interest raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns. The victimization or harassment of an individual making a protected disclosure is a disciplinary offence.

This policy applies where you reasonably believe that one of the following sets of circumstances is occurring, has occurred or may occur within TfaC Malawi or a partner organisation and that your disclosure is in the public interest:

- A criminal offence or a breach of this policy has been committed, is being committed or is likely to be committed;
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject;
- A miscarriage of justice has occurred, is occurring or is likely to occur;
- Information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

It is not necessary that you prove the breach or failure that you are alleging has occurred or is likely to occur, you may simply raise a simple suspicion. However, you should note that you will not be protected from the consequences of making such a disclosure if, by doing so, you commit a criminal offence or if you make the disclosure motivated by a reason which is not in good faith.

If you believe that any of the above practices are happening within TfaC Malawi or a partner organisation the following procedure should be followed:

- First raise the issue with the UK Executive Director / TfaC Malawi Operations and HR Manager / who will treat the matter in confidence within two weeks.
- If it is not appropriate to raise the issues with the UK Executive Director / TfaC Malawi Operations and HR Manager, you should raise the issue with a Board Director.
- If there are grounds to believe that the allegations of illegal activity are well founded, the member of staff will:
 - be informed and given the opportunity to respond
 - be removed from duties without prejudice and the case will be considered by Directors / Executive Director for handing over to the appropriate local authorities, e.g., the Police
- If there is no doubt that the report against the member of staff is accurate, she or he will be immediately handed over to the Police.
- At all times, it must be remembered that the protection of the child or vulnerable adult is paramount, and these procedures must be known by all staff working for TfaC Malawi, and, if it is felt appropriate, by children and young people and their guardian.
- If it is likely that an investigation will be necessary, you may be required to attend an investigatory meeting and/or a disciplinary hearing (as a witness).
- At the investigation meeting you will need to explain fully the nature and extent of what you believe is the problem. You may bring a colleague to help you explain the situation more clearly if you wish.
- Depending on the nature of your complaint, it may not be possible to find an immediate solution, but your concerns will be investigated as quickly as possible and you will be advised of the outcome of the investigation in due course.
- Where it is necessary for you to attend a disciplinary or investigative hearing as a witness, appropriate steps will be taken to ensure that your working environment and/or working relationship is/are not prejudiced by the fact of the disclosure.
- If you are dissatisfied with the outcome of this procedure, you may raise the matter with the Chair of the Board of Directors. If you remain dissatisfied with the outcome you have

the right to express your concerns to the Ministry of Labour, Malawi, the Malawi Human Rights Commission, or the Police.

- If you reasonably believe that the relevant failure as listed in any of the above practices relates wholly or mainly to the conduct of a person other than someone in TfaC Malawi or any other matter for which an organisation other than TfaC Malawi has legal responsibility, then you should make that disclosure to that other organisation.
- If any disclosure concerns information which you do not substantially believe is true or is made in bad faith (for instance, in order to cause disruption within TfaC Malawi), or indeed if the disclosure is made for personal gain, then the person issuing the false claim will become subject to action under the Disciplinary Procedure, which could include dismissal.

Prevention

Recruitment and Vetting Processes

TfaC Malawi recognizes that anyone may have the potential to abuse a child or an adult at risk in some way and therefore all reasonable steps are taken to ensure that unsuitable individuals are prevented from working in and for Theatre for a Change.

All positions will be recruited in line with the following guidelines:

- All employees and volunteers must complete an application form. The application form should elicit information about the applicant's past and self-disclosures about any criminal record.
- Two confidential references must be taken up in writing in all cases, including wherever possible one regarding previous work with children and vulnerable young people and confirmed through telephone contact.
- When taking up references, a systematic check must be made with previous employers about any sexual exploitation and abuse issues related to the recruitee.
- Evidence of identity such as national identity, passport or driving license with photo must be obtained, photocopied and kept in the personnel file.
- Evidence of qualifications must be obtained and must include sight of original certificates.
- Roles with Safeguarding responsibilities will be subject to specific safeguarding competency questions at interview.
- In all positions working directly with participants TfaC Malawi will require police checks to be completed.

All Board Member positions will be appointed in line with the following guidelines:

- Two confidential references may be asked for, including one regarding previous work with children or young people as appropriate. References checks will be confirmed through telephone contact.
- Evidence of identity such as passport or driving license with photo should be obtained, photocopied and kept in the personnel file.

Safeguarding Awareness Training

TfaC Malawi recognises that effective Safeguarding needs to be integrated into every aspect of our work. As a result, we will seek opportunities to develop and maintain the necessary skills and awareness among our employees, volunteers, board members and participants to safeguard children and adults at risk in proactive and responsible ways.

The following procedures will be followed in order to establish a learning culture within the organisation with regard to Safeguarding:

- All new members of employees, volunteers and board members must receive a safeguarding induction, which will include familiarisation with the existing Safeguarding policy and procedures.
- All employees, volunteers and board members must receive safeguarding awareness training, including a refresher on the Safeguarding Policy and its reporting procedures at least every six months.
- The rights of children and adults at risk, and how to report abuse or safeguarding concerns are integrated into the training and education work of TfaC Malawi.

Do No Harm

TfaC's work will follow the principles of Do No Harm.

Each project will undergo the following three step analysis:

1. Understand the context in which you operate, including drivers of conflict, political dynamics, social norms adhered to by communities and the services available;
2. Understand the interaction between your intervention and the context; and
3. Use this understanding to avoid negative impacts and maximise positive impacts of your intervention.

Code of Practice and Behaviour

All paid staff and volunteers must demonstrate exemplary behaviour in order to uphold the rights of the children and vulnerable adults in their care and to protect themselves from false allegations.

The following code of practice is vital to creating a positive and proactive culture within TfaC Malawi.

Code of Practice for all staff and volunteers at Theatre for a Change Malawi

DO

1. Always put the welfare of each child or adult at risk first before achieving goals.
2. Treat all young people and adult at risk with respect.
3. Integrate these values into the delivery of training and educational programmes.
4. Work in an open environment where no sense of secrecy can be fostered.
5. Respect the physical boundaries of all participants.
6. If the need arises for physical contact of a personal nature in an emergency, always inform the person what you are proposing to do and ask their permission to do it. Record all such actions and do not undertake any that you are not qualified to do unless in an absolute emergency.
7. Report all concerns to your line manager, Social Protection Manager or Operations and HR Manager.
8. Involve young people and adults at risk in decisions that affect them.
9. Encourage young people and adults at risk to involve family members in work that they are doing with TfaC Malawi, so that the activities of the company may be well known and understood.
10. Actively promote equality of opportunity and respect for diversity in all areas of your work.

DON'T

1. Use language or actions that could humiliate a child or adult at risk.
2. Take young people or adults at risk to your home, or give them a lift in your car individually without informing another member of staff.

3. Make sexually suggestive comments to anyone.
4. Do things of a personal nature that young people and adults at risk can do for themselves, i.e., getting dressed.
5. Engage in rough or sexual games.
6. Allow any discriminatory, sexualised or foul language.
7. View, download or stream of any material which may be perceived as pornographic, including that of children.
8. We strictly prohibit the photography / filming of any participants that does not adhere to the Communications Policy.

In line with TfaC Malawi's Conditions of Services:

9. Sexual activity with children and abuse by employees or volunteers constitute acts of gross misconduct and are therefore grounds for immediate termination of employment and reporting to the police.
10. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defence.
11. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited, regardless of the age or gender of either party. This includes exchange of assistance that is due to beneficiaries.
12. Sexual relationships between employees or volunteers and participants are strictly prohibited and will result in immediate dismissal since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of development work and TfaC Malawi.
13. Where an employee or volunteer develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he/she must report such concerns for the attention of Executive Director / HR Manager.

Safeguarding in an International Context

TfaC Malawi recognises that as an International Non-Governmental Organisation it operates in a wide variety of cultural as well as geographical settings which have great variations in understanding what constitutes abuse and safeguarding. The board, employees, partners and funding organisations will all be involved in a dialogue about how this safeguarding policy

can be adapted and applied to the different circumstances we operate in while at the same time being assertive about the rights of the child and adults at risk as a standard to work to.

The guidelines in this document will be applied carefully and precisely in ways that:

- Assert the United Nations Convention on the Rights of the Child as the foundation of TfaC Malawi's work
- Invite dialogue rather than confrontation where there is difference between culturally acceptable behaviour and this safeguarding policy.
- Works in partnership with local agencies - working with the same guiding principles and practices - to protect the rights of children and adults at risk.

Communications Systems

Internal Communication

This document will be openly available to all staff and participants and its principles will be constantly refreshed as the foundation of the work for TfaC Malawi.

External Communication

This document will be openly available to all staff and participants and its principles will be constantly refreshed as the foundation of the work for TfaC Malawi. Wherever possible, information will be made available for children, vulnerable adults, and guardians about where to access local support and information relating to safeguarding, and their views sought about the effectiveness of TfaC Malawi's safeguarding policy.

TfaC Malawi will promote depictions of children and adults at risk that emphasise their ability to take positive action to change their lives and the lives of those around them.

Permission of children, adults at risk as well as their parent/guardian should be obtained before pictures are taken and images used for publicity, fundraising or awareness-raising purposes. Wherever possible the child/vulnerable adult/parent/guardian NGO should sign a Media Consent form, which should subsequently be filed in a secure location.

Children and adults at risk should be encouraged to give their own accounts as much as possible, rather than letting others speak on their behalf.

Portrayals of children and adults at risk should take into account how they say they wish to be depicted.

Groups identified by TfaC Malawi as being particularly vulnerable, such as children affected by sexual exploitation, should always have their names changed in external communications and any photos taken should not make the child or adult identifiable. There may be cases when it is not appropriate to approach certain children for photos at all and careful prior consideration must be given.

No personal information (such as location, real name) which could put a child/ adult at risk, should be posted on a Theatre for a Change website or published in public-facing literature.

Images should always be accompanied by appropriate captions.

Any third parties requesting the use of TfaC Malawi pictures or case studies should be required to sign up to TfaC Malawi stipulated regulations for the proper use of the materials. Third parties such as photographers and journalists should sign a 'Statement of Commitment for Third Parties' and receive an induction into TfaC Malawi's Code of Practice and Behaviour (Section 4 above) before visiting any project location.

Social media – including Facebook, Twitter or blogs – as well as video footage generated by TfaC Malawi should be subject to the same guidelines as outlined above.

Access to Advice and Support

Children and vulnerable adults working with TfaC Malawi must be given access to the advice and support that they need.

TfaC Malawi will endeavour to:

- Make contact with relevant and appropriate support agencies to help deliver a joined-up service for young people and adults at risk.
- Provide the best available contacts for children and adults at risk to go to for help and advice in dealing with situations of abuse, whether emotional, physical or sexual.
- Provide supervision and support for members of staff involved directly or indirectly in incidents or allegations.

Implementation and Monitoring

The monitoring of this implementation is integrated into the monitoring, evaluation and appraisal of the work of all members of staff. All personnel will receive a copy of this

document, be expected to know the policy and the procedures for reporting incidents of abuse, and will be involved in reviewing these policies and practices on an annual basis.

Working with Partner Organisations

Where TfaC Malawi is working in partnership with other organisations, the following steps must be followed:

1. Due diligence before the partnership begins should include a review of their safeguarding policy and history. Any concerns will mean the cessation of partnership discussions.
2. If no concerns are raised during due diligence, agreement must be reached with regard to the responsibilities procedures and practices contained in this document. This must be reflected in an agreement by both parties to commit to TfaC Malawi's safeguarding practices and whilst working in partnership.
3. Partner organisations should read and sign this policy statement below and ensure that all staff delivering a shared project to vulnerable children and adults have read and signed this policy.
4. Failure to reach agreement, or a situation arising that causes concern with regard to the partner organisation's practice, will lead to cessation of that partnership.

Where TfaC Malawi is building the capacity of partner NGOs to develop and deliver programmes, the development of safeguarding policies may be targeted as an integral part of the training, if there is an agreed need to do so.

Agreement to comply with this Policy



In order to work with Theatre for a Change Malawi, you must have read and agree to comply with this policy. Please write your name, sign, and date and return this to your line manager.

I confirm as part of my employment with TfaC Malawi that I commit to the TfaC Malawi Child and Adults at Risk Safeguarding Policy and procedures and understand and agree to the following statements:

I have read and understood the TfaC Malawi Child and Adults at Risk Safeguarding Policy and agree to abide by the contents in full. I confirm that I have been fully trained on the relevant policies and procedures;

As a responsible employee in an event I see, hear or suspect of another person abusing organisational policies or breaching this Statement of Commitment, I will inform a member of the Leadership Team, the Executive Director or the Board of Directors or report anonymously via the whistle blowing box;

I understand that any breach of this policy, or this Statement of Commitment may lead to disciplinary procedures, dismissal and possible referral to the police.

Signature:

Date:

Appendix A - Types of child abuse



Physical abuse - including assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing; rough handling; scalding and burning; physical punishments; inappropriate or unlawful use of restraint; making someone purposefully uncomfortable (e.g. opening a window and removing blankets); misuse of medication (e.g. over-sedation); forcible feeding or withholding food; unauthorised restraint; restricting movement (e.g. tying someone to a chair).

Domestic violence or abuse - can be characterised by any of the indicators of abuse outlined in this appendix relating to psychological, physical, and emotional abuse. It includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' based violence, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include acts of assault, threats, humiliation and intimidation; harming, punishing, or frightening the person; isolating the person from sources of support; exploitation of resources or money; preventing the person from escaping abuse; regulating everyday behaviour.

Sexual abuse - including rape, attempted rape or sexual assault; inappropriate touching anywhere; non-consensual masturbation of either or both persons; non-consensual sexual penetration or attempted penetration of the vagina, anus or mouth; any sexual activity that the person lacks the capacity to consent to; inappropriate looking, sexual teasing or innuendo or sexual harassment; sexual photography or forced use of pornography or witnessing of sexual acts; indecent exposure.

Psychological or emotional abuse - including enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends; removing mobility or communication aids or intentionally leaving someone unattended when they need assistance; preventing someone from meeting their religious and cultural needs; preventing the expression of choice and opinion; failure to respect privacy; preventing stimulation, meaningful occupation or activities; intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse; addressing a person in a patronising or infantilising way; threats of harm or abandonment; cyber bullying.

Financial or material abuse - including theft of money or possessions; fraud, scamming; preventing a person from accessing their own money, benefits or assets; employees taking a loan from a person using the service; undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions; arranging less care than is needed to save money to maximise inheritance; denying assistance to manage/monitor financial affairs; denying assistance to access benefits; misuse of personal

allowance in a care home; misuse of benefits or direct payments in a family home; someone moving into a person's home and living rent free without agreement or under duress; false representation, using another person's bank account, cards or documents; exploitation of a person's money or assets, e.g. unauthorised use of a car; misuse of a power of attorney, deputy, appointeeship or other legal authority; rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.

Modern slavery - including human trafficking; forced labour; domestic servitude; sexual exploitation, such as escort work, sex work, and pornography; debt bondage – being forced to work to pay off debts that realistically they never will be able to.

Discriminatory abuse - including unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010); verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic; denying access to communication aids, not allowing access to an interpreter, signer or lip-reader; harassment or deliberate exclusion on the grounds of a protected characteristic; denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic; substandard service provision relating to a protected characteristic.

Neglect and acts of omission and harm - including ignoring medical or physical care needs; failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating and undermining personal beliefs. Harm should be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development, this may be physical, threats or harassment or verbal abuse.

Organisational or institutional abuse - discouraging visits or the involvement of relatives or friends; run-down or overcrowded establishment; authoritarian management or rigid regimes; lack of leadership and supervision; insufficient staff or high turnover resulting in poor quality care; abusive and disrespectful attitudes towards people using the service; inappropriate use of restraints; lack of respect for dignity and privacy; failure to manage residents with abusive behaviour; not providing adequate food and drink, or assistance with eating; not offering choice or promoting independence; misuse of medication; failure to provide care with dentures, spectacles or hearing aids; not taking account of individuals' cultural, religious or ethnic needs; failure to respond to abuse appropriately; interference with personal correspondence or communication; failure to respond to complaints.



Neglect and acts of omission - including failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care; providing care in a way that the person dislikes; failure to administer medication as prescribed; refusal of access to visitors; not taking account of individuals' cultural, religious or ethnic needs; not taking account of educational, social and recreational needs; ignoring or isolating the person; preventing the person from making their own decisions; preventing access to glasses, hearing aids, dentures, etc.; failure to ensure privacy and dignity.

Self-neglect - including lack of self-care to an extent that it threatens personal health and safety; neglecting to care for one's personal hygiene, health or surroundings; inability to avoid self-harm; failure to seek help or access services to meet health and social care needs; inability or unwillingness to manage one's personal affairs.

Appendix B – Reporting Template

<p>Part One: About You</p> <p>Name (optional):</p> <p>Your role (for example staff, contractor, fund recipient):</p> <p>Your relationship to the child or children or adult concerned:</p> <p>How can we contact you if we need more information to help the child/adult:</p>
<p>Part Two: About the Child/Children/Vulnerable Adult(s)</p> <p>Name(s)</p> <p>Male/female?</p> <p>Age:</p> <p>Address if know. If address is not known, how can we find this child / adult to help him/her:</p>
<p>Part Three: About Your Concern (continue on a separate sheet if necessary)</p> <p>Date, time and place of any incident(s):</p> <p>Nature of concern/allegation:</p> <p>Observations made by you (e.g., child's/adult's emotional state, any physical evidence):</p> <p>How did you come to have a concern: was abuse observed or suspected? Was an allegation made? Did a child/ adult disclose abuse?</p> <p>If the child/ adult reported the incident to you directly, please write down exactly what the child/ adult said and what you said:</p> <p>Is there any other relevant information we should be aware of?</p>



Have you reported the incident to anyone else? If yes, please specify

Time and date of reporting:

Person(s) to whom report was made:

Advice given by the person you reported to:

Are you aware of any actions that have been taken to respond to this incident yet?

Do you have any recommendations for us as to actions to take (for example who to contact in country that can help the child/adult)?

Part Four: Other Information (Optional)

Please add any other relevant information below about yourself or the concern you are raising that has not been covered in the previous questions.



Appendix C - Safeguarding Reporting Contacts

Please note, these numbers and emails are for internal TfaC use only.

Position	Name	Contact
Executive Director	Fiona Morrell	fiona.morrell@tfacafrika.com +44 7802 876 196
Operations and HR Manager	Hlupe Chirambo	h.chirambo@tfacafrika.com +265 992 71 46 77
Social Protection Manager	Thandiwe Mbene	thandiwe.mbene@tfacafrika.com +265 993 90 28 65