SAFEGUARDING FRAMEWORK

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Policy Version History

**Version 1.0** of the policy was approved by the Renewable World Board (the Board) on 22nd May 2018.

**Version 2.0** of the policy revised with additional procedures added by Helen Russell, Grants and Impact Manager, Renewable World, in December 2019

**Version 3.0** of the policy revised and updated by Helen Russell (Grants and Impact Manger), and Lisa O’Doherty (Global Programmes Director) March 2021
ACRONYMS

CEO	Chief Executive Officer
NGO	Non-Government Organisation
RW	Renewable World
SFP	Safeguarding Focal Person
SM	Safeguarding Manager
SR	Safeguarding Representative
1. INTRODUCTION

Renewable World is an international development organisation committed to providing renewable energy solutions to marginalised, energy poor communities to tackle poverty and improve livelihoods. Our programmes focus on energy access, enterprise development, and social inclusion interventions in South Asia and East Africa. Our primary beneficiary group in these two regions are rural communities including women, men, young people and children.

We implement our projects through local NGO partners and technical contractors. Our national and regional staff, volunteers/interns, along with staff from partners and contractors work directly with our beneficiary groups. On occasion staff from our UK head office, trustees or consultants will visit project sites for monitoring and observation visits. Donors may also visit and will be accompanied by RW staff at all times.

This document details Renewable World’s approach to safeguarding across our operations. It provides clear definitions, sets standards across the organisation, and gives clear guidance on how to apply and implement the policy throughout the organisation and in our work with partner organisations.

1.1 What is safeguarding?

Safeguarding means promoting and protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. For Renewable World this means to protect anyone from harm who comes in contact with our organisation including employees, volunteers, consultants and beneficiaries. Safeguarding in its broad sense means protecting people and the environment from unintended harm. In particular this policy focuses on preventing and responding to harm caused by sexual exploitation, abuse, harassment or bullying. The aim is to minimise the likelihood and impact of these actions towards both the people Renewable World is trying to help, and the people who are employed or contracted by Renewable World to deliver our work.

2. PURPOSE AND COMMITMENT

The purpose of this policy is to ensure that Renewable World’s activities are implemented in a safe and protective environment where harm, exploitation and abuse are effectively prevented as far as reasonably possible and responded to effectively.

The policy has three specific objectives:

1. Keeping all children and adults who are associated with or come in contact with Renewable World safe.
2. Ensuring the highest standards of behaviour from all individuals associated with Renewable World and minimising the risk of abuse, exploitation and harm being carried out.
3. Safeguarding the reputation of Renewable World, including guarding Renewable World’s staff and representatives from being placed in situations where accusations of inappropriate behaviour could arise from operating within an unclear framework.
3. POSITION STATEMENT
Renewable World has a zero-tolerance policy on discrimination, bullying, harassment, including sexual harassment, sexual exploitation and abuse. We will deliver programme interventions in a manner that as far as possible, prevents any beneficiary, including children and vulnerable adults/adults at risk, and any Renewable World staff, volunteer/intern, consultant, trustee/ambassador and partner staff from experiencing harm.

When Renewable World has reasonable grounds for concern that any stakeholders are being, have been, or are at risk of being harmed, Renewable World will take action in accordance with Renewable World safeguarding procedures in Section 7, without delay and where appropriate, statutory guidance.

Safeguarding is everyone’s responsibility and as an organisation Renewable World is committed to ensuring compliance with best practice safeguarding standards and guidance. As an organisation RW recognises that everyone - regardless of age, gender, racial heritage, religious belief, sexual orientation, disability, or identity, has the right to live their lives free from abuse. We will endeavour to minimise the risk of harm to any stakeholder engaged in or benefitting from operations and programme activities, and take immediate action when concerns are identified.

3.1 Principles of Safeguarding
Renewable World is committed to the six key principles that should underpin all safeguarding functions, actions and decisions, as set out by the UK Care Act 2014. These principles are relevant for both child and adult safeguarding.

1) **Empowerment.** People being supported and encouraged to make their own decisions and informed consent.
2) **Prevention.** It is better to take action before harm occurs.
3) **Proportionality.** The least intrusive response appropriate to the risk presented.
4) **Protection.** Support and representation for those in greatest need.
5) **Partnership.** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
6) **Accountability.** Accountability and transparency in delivering safeguarding.
4. OUR SAFEGUARDING FRAMEWORK

This policy is our key umbrella policy framework and should be read in conjunction with all the documents listed in the Safeguarding Framework, as outlined in the pyramid below. This framework acts as a guide to reduce the risk of concerns arising and manage concerns in a systematic way should they arise.

![Renewable World Safeguarding Framework Pyramid]

5. WHO IS PROTECTED BY THIS POLICY?

This safeguarding policy seeks to protect both internal and external stakeholders as outlined below:

5.1 Internal Safeguarding

Internal safeguarding is the prevention of harm to those people Renewable World considers employees or representatives and therefore has a degree of control over:

- Renewable World staff,
- Renewable World volunteer and interns,
- Renewable World Trustees and Ambassadors.

5.2 External Safeguarding

External safeguarding is about protecting those who Renewable World delivers work in collaboration with or for the benefit of, and therefore less direct control:

- Beneficiaries,
- Consultants/contractors,
- Partner staff.
6. WHO NEEDS TO ADHERE TO THIS POLICY?

6.1 Renewable World Representatives
The Safeguarding Policy is to be applied across all organisational activities and in all Renewable World’s programmes and must be adhered to by the following listed below. The individuals listed below will be referred to as “Renewable World’s (RW’s) Representatives”.

- Renewable World staff,
- Renewable World volunteer and interns,
- Renewable World Trustees and Ambassadors.

6.2 Partner organisations
It is a requirement that project implementing partners and strategic partners will have their own organisational policies, procedures and code of conduct in place covering safeguarding and that partner staff understand how to escalate safeguarding concerns within their organisation and to RW where necessary. Partners remain responsible for ensuring that all their staff are working in accordance with their safeguarding policy. This will be assessed as part of the partner due diligence and capacity assessment process carried out prior to the formalisation of partnerships. Where partners do not have appropriate policies and procedures in place, partners will be expected to develop their own, or adapt a version of Renewable World’s safeguarding policy and procedures as a condition of the partnership. If a partner launches an investigation related to a member of their staff or contractor working on a RW project, the RW SFP must be informed and kept up to date with the procedures. If a partner becomes aware of a safeguarding concern in relation to a RW member of staff they must report it to the RW SFP.

6.3 Consultants/contractors
Renewable World is unable to fully enforce the policy with independent, external agencies, such as contractors however, we can choose not to work with an external agency or can end our relationship with that agency should we become aware of any safeguarding concerns.

All consultants/contractors will be required to sign the Renewable World Contractors Code of Conduct as a condition of the contracting process.

Standard vendor contracts for equipment supply that do not include site work will no be included.
### 7. SAFEGUARDING FRAMEWORK POLICIES AND PROCEDURES

<table>
<thead>
<tr>
<th>Putting safeguarding into practice</th>
<th>Specific areas of activity / indicators</th>
<th>Relevant policies</th>
</tr>
</thead>
</table>
| **1. Recruitment**                | 1. RW will ensure safeguarding is part of all job descriptions when recruiting.  
                                   | 1.2 When recruiting staff, RW will make sure that questions regarding safeguarding are included in any relevant job interviews. Two references will be sought from previous employers including most recent line manager to get more information of the suitability of candidates. The reference request will include a question regarding code of conduct and safeguarding.  
                                   | 1.3 Basic background checks such as Basic DBS or police checks in line with national guidelines will be undertaken for all Renewable World representatives who are based in project country offices and any UK based staff who will travel to the field at least annually. New recruits will be asked to provide this as a condition of their employment. All SMT members will be required to have a DBS/Police check.  
                                   | 1.4 All Renewable World representatives will be required to sign the Organisational Code of Conduct.  
                                   | 1.5 All consultants/contractors will sign the Contractor Code of Conduct along with the contracting process. | Recruitment Policy,  
                                   |                                       | Equal Opportunities and Diversity,  
                                   |                                       | RW Code of Conduct,  
                                   |                                       | HR Policy Manual,  
                                   |                                       | Contractor Code of Conduct, |
### 2. Programme activities

| 2.1 Partners will be selected through a due diligence process (included review of safeguarding and associated polices) and sign a partner sub-contract. |
| 2.2 A project risk assessment which includes safeguarding will take place as part of the inception phase, with a specific section on children and identified vulnerable adults/adults at risk. The risk assessment will include mitigating actions, which will be incorporated into project design/documentation. |
| 2.3 Annual risk assessments for the country and regional offices and associated programmes which includes safeguarding will take place. |
| 2.4 Safety briefings will be delivered at a community level for all projects that involve construction and/or renewable energy technologies. |
| 2.5 All renewable energy technologies will be subject to a safety audit before handover to the community. |
| 2.6 Safety and security briefings will be provided to all travelling staff and external visitors travelling internationally within 24 hours of arrival in country (when visiting project offices or UK). |

### 3. Training

| 3.1 All staff will be given training into the safeguarding framework and reporting mechanisms when joining the organisation (within their probation period) and will be required to sign an attestation confirming they have read, understood, and will adhere to the policies. |
| 3.2 Refresher training on safeguarding and reporting mechanisms will be delivered on an annual basis for all staff. |
| 3.3 Training of partner staff on safeguarding reporting mechanisms will take place during the project inception period. |

| Risk Management, |
| Health and Safety, |
| Safety and Security, |
| Human Trafficking and Slavery, |
| Child Protection, |
| Partner selection and management, |
| Project risk assessment template, |
| Induction, |
| Learning and Development, |
| 3.4 | Renewable World will ensure that the designated Safeguarding positions (SM, SR and the SFP) have the capacity and capability to fulfil their roles. We will do this through training, support and the revision of roles and responsibilities. |
| 4. Communications | 4.1 Renewable World representatives will ensure that informed and appropriate consent is obtained before images or stories of adults and children are captured or shared. In any context where an image or story will specifically identify an individual then consent must be taken. Consent can take the form of informed written consent with a signature or fingerprint where appropriate.  
4.2 Renewable World will ensure that adults and children are represented in an appropriate way that does not exploit, victimise or sexualise them.  
4.3 Renewable World will communicate the Safeguarding Framework through its website and directly to core stakeholders, to demonstrate its commitment and the importance of the policy.  
4.4 Renewable World will appropriately store all data relating to beneficiaries in a secure manner. Any breaches to the security of personal data must be reported and acted on immediately. |
| 5. Reporting | 5.1 Details of how to report a concern can be found in Section 8 of this framework.  
5.2 All concerns will be logged in the Safeguarding Incident Log.  
5.3 The two relevant polices in relation to reporting a safeguarding concern are Grievance and Whistleblowing. |
### 6. Incident Management

<table>
<thead>
<tr>
<th>6.1 All concerns reported will be triaged to categorise the incident and to assess which organisation policy should be enacted to manage the incident.</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.2 All concerns will be managed following the identified RW policy.</td>
</tr>
<tr>
<td>6.3 All actions, decisions and conclusions regarding a reported concern will be logged in the Safeguarding Incident Log</td>
</tr>
</tbody>
</table>

| Bullying and Harassment, Protection Against Sexual Exploitation and Abuse, Disciplinary, |
8. REPORTING A CONCERN

Renewable World will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case. Renewable World representatives will be properly informed of the reporting and incident management procedures. Any Renewable World representative who has a concern or suspicion regarding harm, exploitation or abuse by someone representing another agency must report such concerns to the appropriate members of staff. Any historic incidents or concerns reported will be treated in the same way as recent concerns.

8.1 Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal the identity of the person making the allegation if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the disclosure without the help of the informer, so they may be asked to come forward as a witness.

8.2 Safeguarding Incident Log

A log of all concerns reported, either formally or informally, will be kept and managed by the Safeguarding Manager (SM). All actions taken in response to a reported concern will be logged along with all findings and conclusions.

8.2 Categories of Concerns

There are four types of concerns that can be reported under this policy:

**Category 1:** This concern relates directly to an **allegation against Renewable World employees or representatives.** Renewable World has a duty of care and will respond by initiating an investigation.

**Category 2:** This concern relates to an **allegation against a Renewable World Partner staff member.** Renewable World has a shared duty of care and will require the Partner to initiate an investigation in line with their Safeguarding policy. Renewable World would expect the Partner to share the final report with Renewable World.

**Category 3:** This concern relates to an **allegation against a consultant/contractor.** Renewable World will launch an investigation.

**Category 4:** This concern relates to an allegation against beneficiaries and individuals in a community in which Renewable World or our Partner is working. While Renewable World or the Partner will not have a formal responsibility to investigate, Renewable World or the Partner may pass on information to the relevant local authorities if required and appropriate.

8.3 What to do if you have a Safeguarding Concern?

*If something happens to you…*

- Refer to the **RW Grievance Policy.**

  **NOTE:** This policy is used when there is something that affects you directly. Where it is something that affects others, and it is dangerous and/or illegal then the whistleblowing policy maybe more appropriate.
In summary:

1. You may wish to **discuss** the concern - talk to a Safeguarding Focal Person\(^1\) or your line manager. Note your line manager will need to report this to the Safeguarding Focal Person. This is not a formal report but will be logged (and can be anonymous). The Safeguarding Focal Person can advise you on what to do.

2. You may also wish to discuss what has happened with the other person involved, but only if you feel safe and comfortable to do so. It is not obligatory – it is just an option.

3. Alternative you may wish to formally **report** an incident. Report an incident to your Safeguarding Focal Person. You are welcome to formally report an incident to your line manager, but they will be obliged to report it to the Safeguarding Focal Person or support you to do so. This will be logged as a formal report (and can be anonymous).

4. Contact details of all Safeguarding Focal Persons can be found on the Safeguarding Contact List Section 9.

**If you have a safeguarding concern that relates to another person you have a responsibility under this policy to:**

- Refer to the **RW Whistleblowing Policy**.

**NOTE:** that the Whistleblowing policy covers the following:

- criminal activity,
- failure to comply with a legal obligation or regulatory requirement,
- a miscarriage of justice,
- danger to the health and safety of any individual,
- damage to the environment,
- conduct likely to damage RW’s reputation or financial wellbeing,
- improper conduct of clients or related third parties,
- bribery,
- financial fraud or mismanagement,
- the deliberate concealment of any information related to any of the above matters.

In summary:

1. **Discuss** the concern - talk to a Safeguarding Focal Person or your line manager. Note: your line manager will need to report this to the Safeguarding Focal Person. This is not a formal report but will be logged (and can be anonymous). The Safeguarding Focal Person can advise you on what to do.

2. **Formally report** an incident. Report an incident to your Safeguarding Focal Person. This will be logged as a formal report (and can be anonymous).

3. Contact details of all Safeguarding Focal Persons can be found on the Safeguarding Contact List Section 9.

\(^1\) First point of contact should be your designated SFP. If you cannot contact your SFP or if there is a conflict of interest you may contact the Global Safeguarding Manager or CEO.
## 9. SAFEGUARDING CONTACT LIST

<table>
<thead>
<tr>
<th>Title</th>
<th>Name</th>
<th>Contact Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Safeguarding Manager (SM), UK</strong></td>
<td>Helen Russell</td>
<td><a href="mailto:Helen.Russell@renewable-world.org">Helen.Russell@renewable-world.org</a></td>
</tr>
<tr>
<td><strong>Safeguarding Focal Person (SFP), UK</strong></td>
<td>Grants and Impact Manager</td>
<td>Mobile: +44 (0) 7989190618</td>
</tr>
<tr>
<td><strong>Safeguarding Focal Person (SFP), Nepal</strong></td>
<td>Lisa O’Doherty</td>
<td><a href="mailto:Lisa-Odoherty@renewable-world.org">Lisa-Odoherty@renewable-world.org</a></td>
</tr>
<tr>
<td><strong>Safeguarding Focal Person (SFP), Kenya</strong></td>
<td>Jac Connell</td>
<td>Mobile Nepal: +977 9813680364</td>
</tr>
<tr>
<td><strong>Chief Executive Officer (CEO), UK</strong></td>
<td>Matt Stubberfield</td>
<td>Mobile UK: +44 (0) 07958 011647</td>
</tr>
<tr>
<td><strong>Safeguarding Representative (SR), UK</strong></td>
<td>Diana France</td>
<td><a href="mailto:diana.france@hfw.com">diana.france@hfw.com</a></td>
</tr>
</tbody>
</table>

*Updated: 23 March 2021*
10. INCIDENT MANAGEMENT PROCEDURES

1. The Safeguarding Focal Point must complete the Safeguarding Incident Report Form (Annex 1) when any concern is reported, formally or informally within 24 hours, and log the concern in the Safeguarding Incident Log.

2. The Safeguarding Focal Point will share the Incident Report Form with the Safeguarding Manager. The Safeguarding Manager and Safeguarding Focal Person will “triage the incident”, assessing its severity, its category and decide whether it falls under internal or external safeguarding. During the triage decisions will also be made on whether an informal report should be upgraded to a formal report based on evidence available.

3. Where a formal report is being made the Safeguarding Representative will take part in triaging the incident.

4. The outcome of the triage process will guide what organisational policies and procedures should be referred to for managing the incident. Once at investigation stage the CEO and Trustee Safeguarding Representative will be informed of the incident. Throughout the investigation the Safeguarding Manager will update the Safeguarding Log with all actions, decision and outcomes.

5. The triage team will also decide upon the investigation committee who will then follow the appropriate policy to manage the incident. The investigation committee should include at a minimum a member of the national SMT and the national Safeguarding Focal Person with other committee members decided as appropriate.

6. The Trustee Safeguarding Representative will inform the RW Board of Trustees once an investigation has commenced and provide regular updates based on the Safeguarding Incident Log.

7. Safeguarding incidents defined as serious by the Charities Commission of England and Wales should be reported to the Charities Commission (rsi@charitycommission.gsi.gov.uk), and other affected organisations must also be advised (this includes major donors and other regulatory bodies). The Trustee Safeguarding Representatives and/or the CEO will assess if an incident is to be reported to the Charities Commission.

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2 If there is any allegation against the SFP, SM or CEO then this must be taken directly to the Safeguarding Representative who will then triage with alternative senior staff.
11. MANAGEMENT OF THE FRAMEWORK AND ASSOCIATED POLICIES

11.1 Putting the policy into context
Renewable World will appoint a designated Safeguarding Manager (SM), who is a member of the Senior Management Team, to be responsible for coordinating global compliance, overseeing the resolution of any safeguarding matters, and updating and reviewing the Safeguarding Policy.

Renewable World will have in place a Safeguarding Representative (SR) who is a Trustee, and along with the Ethics and Sustainability Committee, is responsible for annually reviewing the organisational policy. The CEO will be responsible for overseeing the implementation of the Safeguarding policy and management of incidents.

Each Renewable World country office has a Safeguarding Focal Person (SFP) in place, with clear responsibilities for coordinating the implementation of the policy as well as mapping the local/external context (including legislation) for safeguarding.

11.2 Maintaining the Framework
The CEO should review the Safeguarding Log annually and develop an annual report to be shared with the Ethics and Sustainability Committee including training delivered, relevance of policy and incident log. Any findings requiring a change in policy will be recommended by the CEO. A full policy review should take place every three years, instigated and led by the Safeguarding Manager, to include a review of external changes to safeguarding standards that apply nationally and internationally.
ANNEX 1: SAFEGUARDING INCIDENT REPORT FORM

The Safeguarding Incident Report Form must be completed or all concerns by the Safeguarding Focal Point with the support of the individual reporting the concern. Please provide as much information regarding the concern as possible.

1. Concern received by:

<table>
<thead>
<tr>
<th>Name of SFP receiving the concern</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date concern has been raised</td>
<td>Date</td>
</tr>
</tbody>
</table>

2. Concern reported by:

<table>
<thead>
<tr>
<th>Name of Informant</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Position at Renewable World (Or relationship to Renewable World)</td>
<td></td>
</tr>
<tr>
<td>Contact details</td>
<td></td>
</tr>
<tr>
<td>Date/Timeline of the concern being reported</td>
<td></td>
</tr>
</tbody>
</table>

3. Concern details

Outline the nature of the concern being reported. Provide as much detail as possible.

How did this concern come to the informant’s attention? Please give details, including whether they observed/experienced it in person, if someone else reported it to them, or if the victim told them directly. Describe the concerns. Give as many details as possible.
5. Action taken

Has any action already been taken to manage this concern at the point of reporting to the SFP? Please provide details of any action already taken by the informant or other individuals to manage the situation or ensure safety of other?

Report submission:

Name: Signature:

Role/Title: Date