# The Doxa Project Safeguarding of Children and Vulnerable Adults Policy.



30<sup>th</sup> March 2023 Review March 2026

#### 1. Introduction

This policy defines the responsibilities and procedures for child and vulnerable adult safeguarding for all staff, partner subsidiary or affiliated charities, volunteers and trustees associated with or within The Doxa Project. The procedures will provide guidance on how to minimise risk and respond to concerns and allegations of abuse. This safeguarding policy will be reviewed annually.

#### 2. General

The Doxa Project is committed to the safety and wellbeing of all children and vulnerable adults. We have a zero-tolerance policy towards bullying, harassment and sexual exploitation and abuse of children and vulnerable adults.

Signs of abuse may include:

- 1. Left in unsafe situations or without medical attention, constantly belittled, insulted, sworn at or humiliated.
- 2. Seeming to be afraid of carers, volunteers or visitors.
- 3. Severely bruised or injured.
- 4. Aggression towards others.
- 5. Displaying sexual behaviour which seems inappropriate for their age.
- 6. Neurotic behaviour- for example, rocking or self-mutilation.
- 7. Lack of social relationships.

The Doxa Project is run on a voluntary basis within the UK but works closely with other organisations within Kenya. To that aim, partner subsidiaries and affiliated charities must either adopt these safeguarding policies or produce their own that are deemed equivalent by the trustees under the recommendation of the Safeguarding Officer. Each partner subsidiary or affiliated charity should produce a local code of conduct which embodies the requirements and standards of this policy document and ensure that it is understood by all their staff. A copy of the local code of conduct should be available to The Doxa Project.

Whilst recognising the importance of cultural differences in this regard, we believe that children and vulnerable adults have the right to develop in an environment safe from harm, abuse and exploitation. This will be achieved by identifying and managing risks that may lead to harm.

We require that all operational staff and volunteers from the UK undertake a DBS check or provide us with a current DBS check from another organisation along with contact details for that organisation. The Doxa Project are committed to promoting a child safe and friendly culture as the norm, where everyone is committed to keeping children and vulnerable adults safe.

We aim to create an open and aware environment where safeguarding concerns can be raised by anyone and managed in a fair and just manner, protecting the rights of all.

The procedures will provide guidance on how to respond to concerns and allegations of abuse.

### 3. Police Checks

All UK resident director trustees of The Doxa Project will require enhanced DBS checks and on acceptance must apply for the auto-renewal service. Copies of trustees DBS registration certificates, the email confirming auto-renewal registration and the subsequent annual emails informing the person that their DBS check has been auto-renewed, must be sent to the safeguarding officers (Anthea Marshall & Ben Ryan) who will keep a record and ensure people's DBS checks are up to date. Where the safeguarding officer is also a trustee and if any of the other trustees are a 'connected person' to the safeguarding officers, copies of the above certificates and emails will also be sent to Ray Balmer as an independent check.

British non-UK resident trustees should have an International Child Protection Certificate issued by ACRO (Association of Chief Police Officers, Criminal Records Office). Non-British trustees, need to provide an equivalent from the country of their nationality or country of residence as appropriate. Copies must be supplied to the Safeguarding Officer along with any renewals where provided.

All operational staff and volunteers will be required to have a police clearance or relevant criminal history checks depending on the country of operation. Local staff are required to have regular checks in line with statutory requirements of that country and local records kept and maintained.

### 4. Code of Conduct.

The Doxa Project (TDP) expects all its Overseas and National Staff and Volunteers to give respect and dignity to all children and vulnerable adults associated with the work of TDP. Children or vulnerable adults will not stay overnight in the residence of TDP Staff or Volunteers, unless accompanied by a parent or adult family member and approved by the TDP staff. Further details can be found in the Volunteer safeguarding guidance policy.

Risk management is an ongoing part of every activity and staff and volunteers will actively minimize situations where children and vulnerable adults could be harmed.

Photography and social media: - Children and vulnerable adults should be portrayed in a respectful, dignified and appropriate way. Local cultural traditions should be assessed regarding restrictions for reproducing personal images. These images should be protected by

changing names and concealing sensitive background information. Please refer to the Data Privacy Policy for more information.

## 5. Whistleblowing Procedures.

Whistleblowing is the act of raising a concern about any wrongdoing (including financial impropriety). Sharing information, or talking through any concern, will be the first step towards helping The Doxa Project prevent harm, support victims, investigate failings, discipline offenders, ensure remedial action and protect our reputation. Everyone associated with The Doxa Project will be encouraged to report any wrongdoing and will have their privacy and confidentiality maintained as far as possible and mindful of legal requirements. Reports should be made to the trustees or safeguarding officer as appropriate. The whistleblower will be informed of decisions to progress a complaint and the outcome of any investigation.

### 6. Reporting Procedures.

All concerns and reports of abuse will be taken seriously and acted upon immediately. These concerns may relate to a child, vulnerable adult, staff, or volunteer involved with the organization. Such concerns should be made directly, either verbally or in writing, to the trustees or if this is not appropriate, to the designated safeguarding officer of the organization. All the relevant information will be gathered and assessed, addressing any health or protection needs of those about whom the concern has been raised.

If allegations are considered to include a criminal offence, it will be directly referred to the police or appropriate authorities. If an internal or police investigation exposes a significant unaccountable financial position, the Charity Commission shall be informed. If an investigation reveals evidence of a serious mis-use of The Doxa Project's charitable status, either internally or by a third party, the Charity Commission shall be informed.

All such incidents, and any accidents, regardless of the outcome will be recorded in a local incident book. Affiliated charities must maintain an incident book and make regular reports to The Doxa Project on the current incidents recorded.

It should be noted that all safeguarding incidents should be reported even when they are not directly within The Doxa Project or partner subsidiary or affiliated charity's organisation.

Incidents that relate to a serious threat of harm or abuse should be notified to the safeguarding officer as a matter of urgency. The safeguarding officer will maintain a safeguarding register to record all safeguarding incidents and their outcomes. To ensure the privacy protection of sensitive information, the register will be securely stored and password protected, the password being known only to the safeguarding officer and in-country operational directors. This register will contain an ongoing log of the incident or safeguarding threat, mitigating or remedial actions taken, significant developments and any notification made to external agencies. Any active register entry will be regularly reviewed by the Board of Trustees until the incident is deemed closed.

### 7. Disciplinary.

Any breach of the standards in this policy document or local code of conduct will be considered a disciplinary matter and dealt with by the board of trustees.