

## Safeguarding Team

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# Safeguarding Policy

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# Safeguarding Policy Statement

The British Council is the United Kingdom's international organisation for cultural relations and educational opportunities.

In our work we meet many children and adults who are potentially at risk for a variety of reasons. We aim to create a safe environment in which no child or adult will experience harm or exploitation during their contact with us.

We will, where reasonably practicable, follow relevant UK and International laws and standards, as well as ensuring local legal compliance.

## The British Council is committed to:

- valuing, respecting, and listening to children and adults, maintaining confidentiality, and acting proportionately.
- maintaining strong safeguarding systems, to reduce risk and manage situations where abuse and harm could occur.
- share best practice and information regarding safeguarding concerns with relevant parties, involving children and adults where appropriate.
- conducting thorough assessments where abuse is suspected or has occurred.

We require all staff to ensure their behaviour is consistent with this policy. We also require that clients, customers, partners, and suppliers are made aware of this policy and operate within it.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated throughout the organisation and understood by all staff.

## Summary

This Policy sets out the broad framework and expectations relating to safeguarding children and adults. It articulates why safeguarding is important and the actions the British Council will take to meet its responsibilities when interacting with children and adults. The policy does not cover staff [www.britishcouncil.org](http://www.britishcouncil.org)

concerns which are addressed under Human Resources and other organisational policies.

The British Council promotes a zero-tolerance approach to inaction. In practice this means that all necessary efforts must be made to comply with the policy, irrespective of cost implications or operational inconvenience.

The British Council requires all staff to immediately report safeguarding concerns to an appropriate Manager, Safeguarding Focal Point, or to the Global Safeguarding Team. The external reporting form, the raising concerns policy and Safecall are additional reporting mechanisms that can be accessed.

This policy is in line with our values, forms part of our Code of Conduct and is referred to within both to support compliance and risk management.

This policy is intended to compliment and reinforce other British Council Policies and Procedures that are relevant to Safeguarding – including Code of Conduct, Health & Safety, Equality, Teaching Quality Standards, E-Safety and Data Protection.

The British Council will review this policy annually to reflect new legal and regulatory developments.

## Background

In previous years, the British Council has held child protection policies in line with existing UK and International legislation. Since 2018 we have extended the service by incorporating the adult safeguarding agenda, therefore the terminology has changed from child protection to safeguarding.

To reflect these changes, the Global Safeguarding Service amalgamated the Child Protection and the Adults at Risk policies into this one document.

## Definitions

For ease of reading the policy, and to prevent having to repeat lengthy definitions throughout, the following terms are used:

### **Child:**

A child is defined as anyone who has not reached their 18th birthday.

We use the definition of a child according to international law as set out in the United Nations Convention on the Rights of the Child (UNCRC)<sup>1</sup>, 1989. Although the national laws in countries that we work may have different ages at which a child is considered responsible, an adult, or can give consent.

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<sup>1</sup> The United Nations Convention for the Rights of the Child is the international framework which sets out the specific rights of children, including the right to protection. Over 190 countries are signatories to the Convention.

**Adult:**

An adult is defined as:

- any person aged 18 years or over.
- who identifies themselves as unable to take care or protect themselves against significant harm, exploitation, or neglect or is understood to be at risk, which may be due to frailty, homelessness, mental or physical health problems, learning or physical impairments, and/or impacted by disasters or conflict.
- It is important to consider that any adult can be at risk, and this might be a temporary or ongoing situation depending on the protective factors around them.

**Staff:**

The term staff applies to national, international and UK personnel working in an individual capacity with the British Council, irrespective of the contract used. This includes paid and unpaid staff and volunteers engaged on a one off, short, or long-term basis. It also covers consultants and contracted temporary personnel.

**Partners, Suppliers & Contractors:**

The terms 'partners, suppliers and contractors' relate to all those who we have a contract or agreement with to provide goods, services, or collaboration. There may be a financial or alternative benefit, but this is not essential. It includes implementing partners who carry out work on our behalf and other stakeholders with whom the British Council may establish a working relationship, such as Ministries, and Donors and Funders.

**Safeguarding:**

In the context of this Policy, 'safeguarding' does not mean preventing accidents (covered by our Health and Safety Policy) or making sure that a child's rights (as defined in the UNCRC and human rights as defined in the Universal Declaration of Human Rights) are fully implemented. Instead, we are referring specifically to the protection of children and adults from abuse.

**Child Abuse:**

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The British Council uses the definition of abuse endorsed by the World Health Organisation<sup>2</sup> :

‘Child abuse’ or ‘maltreatment’ constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development, or dignity in the context of a relationship of responsibility, trust or power’.

### **Adult Safeguarding:**

Safeguarding adults means protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to both prevent and respond to risks and experiences of abuse or neglect, while at the same time making sure the adult’s well-being is promoted, including where appropriate, having regard to their views, wishes, feelings and beliefs in deciding any action.<sup>3</sup>

Safeguarding adults involves reducing or preventing the risk of significant harm in relation to neglect or abuse, while also supporting people to maintain control of their own lives.

### **Sexual Exploitation Abuse and Harassment:**

Sexual Exploitation, Abuse and Harassment (SEAH) is a distinct category of harm that poses unique risks to vulnerable individuals and populations, including children, adults, refugees and displaced persons. By incorporating SEAH guidance in the policy, the British Council explicitly recognises and addresses the specific risks, ensuring that individuals are better protected within the organisation’s activities and programmes. It also signals our commitment to accountability, transparency and responsible conduct and ensures the British Council takes proactive steps to prevent its staff volunteers and partners from being complicit in acts of exploitation and abuse.

Emphasising SEAH in this policy seeks to promote a culture of respect, equality and non-discrimination, discouraging harmful behaviours. Many countries have laws and regulations related to SEAH, which the British Council aims to be in alignment with, the British Council aims to appropriately mitigate legal risks and demonstrate compliance.

## **Introduction**

The definitions of safeguarding that guides our work in the British Council, are taken from the statutory guidance below:

- Safeguarding children as defined in [Working Together to Safeguard Children 2018-2022](#)
- Safeguarding adults at risk as defined in the [Care and Support Statutory Guidance](#) issued in the Care Act 2014

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<sup>2</sup> For further information see [www.worldhealthorganization.org](http://www.worldhealthorganization.org)

<sup>3</sup> Care Act (DH, 2014a) <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

For the British Council there are major challenges in both developing and implementing a safeguarding policy because of the number of countries and different contexts we work in and the diversity of our operations. It is recognised that at country level, teams will have to identify how to fulfil the requirements of the policy, given the local operating conditions and legalities.

**This policy is mandatory and must be applied in all situations where the British Council, or our partners, work.**

The British Council has a zero-tolerance inaction approach to safeguarding. In practice this means that all necessary efforts must be made to comply with the policy, irrespective of cost implications or operational inconvenience.

Where it is not possible to comply with the policy (for example if there are laws governing employment which affect local recruitment practices or for security reasons), this must be brought to the attention of the Global Safeguarding Team so an appropriate alternative course of action can be agreed. **Failure to do so would be a breach of this policy.**

Our policy considers two levels of intervention:

- **PREVENTATIVE** – to reduce the likelihood of a child or an adult being harmed or abused.
- **RESPONSIVE** – taking actions to ensure where concerns are raised or situations of suspected harm or abuse are identified, appropriate steps are taken to ensure the child, or an adult is supported. And to prevent or reduce the likelihood of similar situations reoccurring.

## Cultural Sensitivity

The British Council aims to work in ways which are culturally sensitive and respect the diverse nature of the people and locations in which we work. We will seek to safeguard children and adults in ways which are sensitive and appropriate to their context.

It is acknowledged that protecting children and adults within the legal framework required of the British Council as a UK based organisation, and as articulated in this policy, can be a difficult balancing act, as understandings of what is harmful may differ.

The British Council's belief that "everyone everywhere matters" reflects our commitment to valuing the dignity, rights, and wellbeing of all individual, regardless of their background or circumstances. This foundational principle affirms our dedication to promoting a safe and inclusive environment for everyone we engage with, be it children or adults.

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The assertion that “culture must never be used as a reason to abuse children or adults” underscores the British Council’s stance against cultural relativism when it comes to safeguarding vulnerable people. This means that cultural practices or beliefs should never be used as a justification or excuse for harmful behaviours, including sexual exploitation, abuse, or harassment, regardless of cultural norms or traditions.

The Global Safeguarding Team should be consulted for further guidance as necessary.

## Purpose

To ensure that the British Council exercises its duty of care to safeguard children and adults.

## Scope

All staff globally are expected to comply with this policy.

The policy covers partners, contractors, and suppliers, and is also relevant for those with whom we engage including children, parents, and communities.

In cases where the British Council are not the lead partner (i.e., we are not the primary funders), then it is expected that we will encourage and advocate for our partners to either follow the British Council Safeguarding Policy or develop their own.

## Principles

There are several key pieces of legislation and guidance that inform the principles underpinning this policy, and our practice in relation to safeguarding children and adults, these include:

- The Children Act 1989/2004 and 2007
- United Nations Convention on the Rights of the Child 1989
- Working Together 2023
- The Care Act 2014
- Human Rights Act 1998
- Keeping Children Safe in Education 2023
- FCDO Guidance - Safeguarding against Sexual Exploitation and Abuse and Harassment (SEAH) in the aid sector 2024

The following section outlines our principles and values when safeguarding children and adults.



## Children

- **Best interest of the child** is paramount and shall be the primary consideration in our decision making.
- **Respect for children's rights**, including the right to protection and the right to participate in decisions affecting their lives, as enshrined in the UNCRC 1989.
- **Equality of opportunity** to ensure that all children can enjoy British Council activities safely regardless of their gender, ability, race, ethnicity, circumstances, or age. Vulnerable children require particular attention to optimise their safety and protection and promote their access to opportunities.
- **Consultation** with children and their families regarding the implementation of the Policy and procedures developed to support its implementation.
- **Cultural sensitivity and recognition of local context** in decision making and in informing our procedures.
- **Accountability and being responsible** to meet our obligations regarding our duty of care towards children and acting where we believe that a child is at risk or has been harmed.
- Working in an **honest and transparent** way by informing those we work with, including children, about our Safeguarding Policy, and explaining how we work to safeguard them.
- **Ensuring confidentiality** to protect sensitive personal data. Information will only be shared on a need-to-know basis - access to information must be necessary solely for the purpose of conducting official duties.
- **Working together to safeguard children** both across the British Council and with other organisations. This includes law enforcement and specialist child welfare agencies where necessary.

## Adults

- **Empowerment**

People are supported and encouraged to make their own decisions and to give informed consent.

*“I am asked what I want as the outcomes from the safeguarding process, and this directly inform what happens.”*

- **Mitigation**

The British Council has engaged in developing a range of tools and approaches to identify and mitigate potential risk. These resources will be disseminated to all strategic business units to ensure a universal understanding and approach is adhered to.

*‘Tools and frameworks will be disseminated to the appropriate managers to ensure the identification and management of risk’.*

- **Proportionality**

The least intrusive response appropriate to the risk presented.

*“I am sure that the professionals will work in my interest, and they will only get involved as much as is necessary.”*

- **Protection**

Support and representation for those in greatest need.

*“I get help and support to report abuse and neglect. I get help so that I can take part in the safeguarding process to the extent to which I want.”*

- **Respond Quickly**

Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting, and reporting safeguarding concerns.

*“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”*

- **Accountability**

Accountability and transparency in delivering safeguarding.

The above principles are in line with and supported by the British Council Values. These values govern our decision making, organisational culture and behaviours and our dealings with external contacts and underpin how we implement this policy.

## British Council Values

The British Council has six corporate values arranged in three pairs:

- Open and committed
- Expert and inclusive
- Optimistic and bold

# Preventative Actions (Internal Controls)

The key to safeguarding is abuse prevention. It is widely recognised that organisational awareness and good practice can promote positive staff actions, reduce opportunities for offending and enable earlier detection and response to safeguarding concerns. Design, development and delivery of programmes and projects that have not appropriately and proactively assessed safeguarding risk can negatively impact children and adults who may directly or indirectly be harmed because of our activities.

The following areas outline the ways in which this policy will be implemented across the organisation, in addition to the systems in place to support abuse prevention, so that children and adults are not harmed during their contact with British Council

## Roles and Responsibilities

Across the organisation, there are specific roles that have named and defined responsibilities to support corporate strategy, risk management and ensure effective implementation of safeguarding policies and procedures, as outlined in the [Accountability and Responsibility Framework](#). The Global Safeguarding Team will be responsible for developing procedures and guidance available to all staff and partners, which articulates how the organisation will put the safeguarding policy into action and will be accessible through the [Global Safeguarding Intranet site](#). This will be further supported by training and upskilling designed and delivered by the Global Safeguarding Team.

## Accountability

Accountability for the implementation of the safeguarding policy at country level rests with the Country Director. Within departments and support functions, such as English and Exams, Cultural Engagement, HR etc., accountability at regional level rests with Regional Heads of department and at corporate level with the department Directors in the UK.

Ultimate accountability for safeguarding within the British Council globally rests with the Board of Trustees. More information on safeguarding roles and responsibilities can be found in the [Accountability and Responsibility Framework](#).

All breaches of the Safeguarding Policy will be considered as serious, and action taken.

## Standards

Safeguarding Standards informed by legal requirements and best practice benchmarks have been developed by the Global Safeguarding Team. They provide consistency in the mitigation of risk across the organisation and describe what British Council operations should have in place to prevent abuse and to respond to incidents appropriately. More information on the Safeguarding Standards can be found on the [Global Safeguarding Intranet site](#).

## Risk Mapping, Self-Audit & Action Plans

To support prevention mechanisms, the Global Safeguarding team have developed a system which helps countries understand and monitor safeguarding risks within their contexts and implement measures according to the Safeguarding Standards, to reduce the likelihood of incidents occurring. This is achieved and implemented through the Safeguarding Risk Mapping, Self-Audit & Action Plans.

On an annual basis, upon request and using a format set out by the Global Safeguarding Team, every country must conduct a safeguarding risk mapping exercise through the submission of information on the type of work being undertaken in relation to activities with children and adults; enabling us to have a clearer understanding of our risk exposure.

Additionally, every country and Department at corporate level must undertake a self-audit of safeguarding, to measure progress in implementing the safeguarding policy and identify gaps in safeguarding. The audit should be prepared by the Safeguarding Focal Point/National Safeguarding Manager, in conjunction with other key staff, and reviewed by the Global Safeguarding Team. After review, audits must be signed off by the relevant Country Director or Department Leads.

All countries and departments must prepare an annual Action Plan, which sets out what actions they need to take to ensure adequate abuse prevention measures are in place. The plan must detail any action necessary to implement the safeguarding policy as identified in the annual Safeguarding Self Audit. The Safeguarding Action Plan must be agreed with the Global Safeguarding Team and signed off by the relevant Country Director or Department Lead.

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## Integrating Safeguarding

Safeguarding must be integrated and actively managed into new and existing business activities, processes, and systems to promote and mainstream abuse prevention throughout the British Council. Safeguarding must be considered from the outset, during product design and development and all planning stages. Special consideration to safeguarding must be given when working with children and adults in difficult and challenging locations (such as conflict areas) or where children and adults may be especially vulnerable (for example due to young age, disability, race, culture or gender) to ensure that all risks are adequately considered and addressed.

Risk management and compliance are crucial to ensuring we meet our responsibilities to protecting children and adults. The Global Safeguarding Team has developed several resources to support and assist which can be accessed through our [Global Safeguarding Intranet site](#), to support teams across the organisation.

## Information and Briefings

To ensure the effective implementation of the safeguarding policy into action, following appointment, all staff, partners and contractors will be given briefings on our Safeguarding Policy.

While the British Council has a responsibility to ensure training and education is provided in accordance with the policy, all staff have an individual responsibility for accessing and participating in such training.

All staff should be provided with a copy of the Safeguarding Policy and given the name and contact details of their local Safeguarding Focal Point.

All partners, suppliers, contractors, and customers (including children, adults and parents who participate in projects and programmes) should be made aware of the existence of our Safeguarding Policy and provided with copies on request. This should include advice about who to contact if they have a concern / allegation or a complaint.

The Safeguarding Global Policy Statement should be translated into local languages where appropriate using a format that is suitable for the context and placed where it can be easily seen/located by all using our services.

## Advice and Support

All staff have access to advice and support regarding the integration of safeguarding within business activities, implementation of the safeguarding policy or its applicability. Resources and guidance necessary to support the implementation of the policy are available on the [Global Safeguarding Intranet site](#). In cases where staff have specific safeguarding concerns or need further assistance, they should contact their local Safeguarding Focal Point or the Global Safeguarding Team.

In addition, country offices through the Safeguarding Focal Point or National Safeguarding Manager should identify and establish links with local safeguarding and law enforcement agencies that can provide specific information and guidance on safeguarding according to the local legal, cultural, and operating context.

## Responding to Allegations and Concerns

As a UK based organisation working overseas, in addition to local legislation, the British Council has specific legal and regulatory obligations under UK and International law as specified in the Principles section of this document. This relates to the protection of children and adults in all countries we work in and the expectations we place on our partners, contractors, and suppliers.

In 2014, the Charity Commission made reporting safeguarding incidents a requirement; failure to report could result in regulatory action.

The British Council has a duty of care to: -

- Ensure we respond appropriately to situations of actual or suspected abuse/harm both from within and outside the organisation.
- Promote the Best Interests of children and adults.
- Take measures to prevent risk situations arising or reoccurring.
- Ensure our compliance with all legal and regulatory requirements in relation to any crimes that may have been committed.

## What is Abuse?

<b>Abuse is a violation of an individual's human and civil rights.</b>	
<b>Abuse Types</b>	<b>Definition</b>
Physical	Assault, rough handling, pushing, biting, scalding, spitting, punching, unauthorised restraint
Domestic Violence	Controlling, threatening, degrading and violent behaviour in intimate or familial relationships
Sexual	The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited

	exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.).
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another. It includes transactional sex, solicitation of transactional sex and exploitative relationship. This includes any offer or promise for sexual or sexualised acts, in exchange for money, goods, services, or opportunities. It also includes demands for inappropriate/unconsented photography, filming, or exposure to pornography or pornographic material etc.
Neglect & Acts of Omission	The ongoing failure to meet a person's basic physical, emotional, or psychological needs. For example, not providing food, shelter, or clothing, not responding to educational or medical needs of someone who is reliant on you.
Psychological or Emotional	Intimidation; Coercion; harassment, threats, Cyber bullying, enforced isolation, intentionally leaving someone unattended when they need assistance; stopping a person from meeting their religious and cultural needs; preventing the expression of choice and opinion
Organisational or Institutional	Abusive and disrespectful attitudes toward people using the service, lack of respect for dignity and privacy,
Modern Slavery	Human trafficking, forced labour, debt bondage, sexual exploitation
Discriminatory	Unequal treatment based on difference – race, gender, civil partnerships, belief, sex or sexual orientation
Financial or Material	Theft of money, scamming, fraud, preventing someone from accessing their own money, false representation, exploitation of a persons money or assets

Everyone shares responsibility for safeguarding and promoting the welfare of children and adults and for supporting the implementation of this policy, irrespective of individual roles.

Managers are accountable for fostering a safe working environment that is free from any form of harassment, exploitation, abuse, or harm. They lead by example and uphold the highest ethical standards. Demonstrating respectful and inclusive behaviour sets the tone for the entire organisation.

Managers at all levels are responsible for developing and implementing systems and procedures that support the prevention of abuse and harm and include providing appropriate support for other staff.

In addition, some post holders, including managers and those with additional safeguarding responsibilities, will have specific responsibilities as described in their role profile, deliverables, the Accountability and Responsibility Framework as well as in this policy.

Irrespective of role or function, all those working for or on behalf of the British Council, in any capacity, have a responsibility to:

- Report all allegations or concerns about actual or suspected incidents of abuse involving a child(ren) or adult(s) who is a beneficiary or service users of the British Council.
- Report all allegations or concerns about actual or suspected incidents of abuse involving a child(ren) or adult(s) even if they are not known to the British Council (for example a sibling of a child or adult attending a British Council Teaching Centre).
- Report all allegations or concerns about actual or suspected staff misconduct or criminal activity involving the abuse of a child(ren) or adult(s).
- All allegations or concerns must be treated with confidentiality and shared on a need-to-know basis.

It is not the responsibility of staff to decide whether abuse has taken place. All staff, however, have a mandatory duty to report any concerns – even where these are vague and are only a suspicion or ‘intuition’ that something is not right.

No staff member can agree to keep information regarding actual or suspected abuse ‘private’ as a personal confidence.

The British Council is not an investigative authority, and therefore where appropriate referrals will be made to relevant social welfare/statutory and law enforcement agencies. The British Council will seek agreement to making a referral from the child and their parents/guardians or the adult unless this places them at increased danger/risk of harm. In such cases the decision to refer without this consent will be made in conjunction with the Global Safeguarding Team.

The No Harm principle will also be applied in all cases where there is a need for a referral to an external statutory agency.

To report an allegation or concern, contact your Safeguarding Focal Point, National Safeguarding Manager, or the Global Safeguarding Team. More information on reporting procedures can be found on the [Global Safeguarding Intranet site](#).



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# Safer Recruitment

A strong emphasis on safer recruitment demonstrates the British Council's commitment to safeguarding and helps in maintaining our reputation as a responsible and reliable organisation.

Adhering to the legal requirements of the different jurisdictions in which the British Council operate, helps us to be compliant and avoid possible legal liabilities.

Rigorous safer recruitment procedures are vital to ensure that only safe, trustworthy, and qualified candidates are hired. By carefully selecting and screening employees and volunteers, the chances of incidents related to abuse or exploitation are reduced, leading to a safer environment for all. The British Council's Code of Conduct is incorporated within the recruitment process, making it clear what behaviours are expected from staff.

## Monitoring and Evaluation

### Resources

Each country, region and department must set aside appropriate financial and human resources to ensure the effective implementation of the Safeguarding Policy. The British Council requires that *'all necessary measures [are taken] to achieve compliance, regardless of cost'*.

### Monitoring Mechanisms

Country Directors and Department Leads may be required to provide information regarding the implementation of the safeguarding policy through other reporting and monitoring mechanisms established by the British Council – such as Internal Audit, Risk reporting and Business Continuity plans.

In addition to internal monitoring mechanisms, the implementation of this policy is also subject to external monitoring and reporting to relevant bodies such as the Charity Commission and FCDO.

## Review of Safeguarding Policy

Responsibility for reviewing and updating the Safeguarding Policy lies with the Global Safeguarding Team. This policy will be reviewed annually, to ensure it continues to meet legislative, regulatory requirements and best practice.

