

Safeguarding and Protection Policy (including Children and Vulnerable Adults)

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1. Policy Statement and Commitment

Blue Ventures' safeguarding policy and commitment are founded in [its values](#), rooted in [its 2030 strategy](#) and defined by its [Code of Conduct](#).

They are aligned with the international standards of [IASC Minimum Operating Standards](#), the [9 Principles of the Core Humanitarian Standards](#) and the Common Approach to Protection from Sexual Exploitation, Abuse and Harassment ([CAPSEAH](#)) and built around three pillars:

- Policies
- Reporting Mechanisms
- Zero tolerance for inaction:
 - This means: zero tolerance for acts of Sexual Exploitation Abuse and Harassment (SEAH) and any other form of abuse (including towards children); zero tolerance for inaction to prevent, report or respond to SEAH; and zero tolerance for retaliation against victim-survivors or whistleblowers.
 - It does not mean having zero cases of SEAH being reported. Reporting is strongly encouraged and should not be penalised.

Blue Ventures defines Safeguarding as its commitment to:

- adopt any and all reasonable measure to protect the welfare, safety, and rights of all individuals, particularly People at Risk (including children and vulnerable adults) who come into contact with the organisation, its programs, staff, or associated personnel
- uphold a **Zero Tolerance** approach to all actual or attempted forms of abuse of a position of vulnerability, differential power or trust for personal gain, including but not limited to sexual exploitation, abuse and harassment (SEAH) against people at risk (children and vulnerable adults) by any BV Representative.

1.1 Scope and Application

This policy applies to all individuals representing Blue Ventures globally, including but not limited to:

- All BV employees, regardless of contract type or location.
- Trustees and Board members.
- Consultants, contractors, interns and volunteers
- Implementing partners and their staff when working on BV programs.
- Visitors to BV offices, sites, or partner communities.

(Collectively referred to as "BV Representatives" or "Representatives").

2. Guiding Principles

The welfare and best interests of the people at risk (including children and vulnerable adults) are paramount. BV is guided by the following principles:

1. **Welfare is Paramount:** The safety, dignity, and wellbeing of beneficiaries and people at risk (including children and vulnerable adults), are the primary consideration in all BV operations.
2. **Zero Tolerance:** There is a zero-tolerance stance on all forms of abuse, exploitation, and neglect (including SEAH), and towards any form of inaction for incoming reports
3. **Shared Responsibility:** Safeguarding is the duty of every BV Representative.
4. **Survivor-Centered Approach:** All reports will be handled with sensitivity, prioritizing the safety, dignity, and expressed wishes of the person affected (the survivor/victim).
5. **Accountability:** All allegations will be investigated thoroughly, confidentially, and consistently, leading to appropriate disciplinary or legal action where misconduct is confirmed.

3. Definitions of People at risk and Abuse

3.1 People at Risk

- **Child:** Any person under the age of 18 years, regardless of the age of majority or consent in the country where they are located.
- **Vulnerable Adult:** A person aged 18 years or over who, due to physical or mental disability, age, illness, or circumstance (such as social, economic, or geographic isolation), may be unable to take care of themselves or to protect themselves against significant harm or exploitation.

3.2 Types of Abuse and Harm

Abuse and harm include, but are not limited to:

- **Exploitation:** any actual or attempted abuse of a position of vulnerability, differential power or trust for personal gain. Including, but not limited to, and form of SEAH and Financial Abuse.

- **Sexual Exploitation¹:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting monetarily, socially, or politically from sexual exploitation of another. It includes transactional sex, solicitation of transactional sex and exploitative relationship
- **Sexual Abuse¹:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. All sexual activity with someone under the age of 18 is considered to be sexual abuse, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defence.
- **Sexual Harassment²:** A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating
- **Financial Abuse:** Theft, fraud, exploitation, misuse, or misappropriation of a vulnerable person's property, possessions, or benefits
- **Physical Abuse:** Causing physical harm or injury, including hitting, slapping, shaking, or inappropriate physical restraint.
- **Emotional/Psychological Abuse:** Causing emotional harm, including intimidation, verbal harassment, humiliation, sustained psychological and emotional injury caused by bullying, or constant criticism.
- **Child Marriage³:** A formal or an informal union of two persons where at least one of them is under 18 years old. In the context of Safeguarding, the practice of child marriage is considered a form of child abuse and exploitation because it removes the child's right to control their own life, body, and future. It results in Premature Adulthood and the immediate loss of protection.
- **Modern Slavery⁴:** an internationally recognized umbrella term that encompasses several distinct, but related, criminal offenses and human rights abuses (including Slavery, Servitude,

¹ [United Nations \(2017\) Glossary on Sexual Exploitation and Abuse. Second Edition.](#)

² United Nations (2017) Glossary on Sexual Exploitation and Abuse. Second Edition.

³ UNICEF Data & UNFPA (aligned with the Convention on the Rights of the Child)

⁴ UK's Modern Slavery Act 2015 (MSA 2015)

Forced or Compulsory Labour, Human Trafficking). It is defined not by a specific practice, but by the loss of freedom and control over a person by another, for the purpose of exploitation and personal or commercial gain. It is especially relevant for BV in order to ensure that staff are trained to recognise indicators of modern slavery and that operation, procurement and partners are not contributing to modern slavery in the supply chain.

- **Neglect:** Failing to provide necessary care, protection, supervision, housing, health care, or education.

4. Code of Conduct and Prevention Measures

All BV Representatives must adhere to the [BV Code of Conduct](#), which includes the following specific guidelines for working with children and vulnerable adults:

4.1 General Professional Conduct (Do's)

Do	Do Not
Be Respectful: Treat all individuals equally, with dignity, and respect for their cultural background.	Exploit: Engage in any form of exploitation (sexual, financial, or power-based).
Maintain Visibility: Work in an open, public environment and remain visible when interacting with people at risk (including children and vulnerable adults).	Be Alone: Place yourself in a compromising or vulnerable position, such as being alone with people at risk out of sight or earshot of others, unless absolutely necessary and pre-approved by a supervisor.
Use Appropriate Language: Use clear, respectful, and appropriate language, avoiding derogatory, suggestive, or overly familiar terms.	Discriminate: Show favouritism, exclusion, or discrimination based on gender, ethnicity, disability, or beliefs.

Build Empowerment: Encourage and respect the voices and views of children and vulnerable adults.

Initiate Physical Contact: Initiate physical contact (hugs, holding hands, sitting on laps) unless it is a necessary, professional action (e.g., first aid) and the person has agreed.

4.2 Specific Guidelines for Working with Children

- Avoid doing anything of a personal nature for a child that they can reasonably do for themselves (e.g., dressing, bathing).
- Be aware of the potential for peer abuse (bullying or victimisation among children) and implement supervision measures to mitigate this risk.
- Never encourage crushes, inappropriate behaviour, or suggest relations of any kind.

4.3 Use of Images and Media

All digital media is produced and published in accordance with the [Ethical Photography Guidelines](#) and adhere to the following principles:

- **Consent is Mandatory:** All photographs, videos, or case studies featuring people at risk (including children or vulnerable adults) must be taken with the prior, informed, written or verbal consent of the individual and their parent/guardian/authorised representative.
- **Dignity and Safety:** Images must be respectful and dignified. Individuals must be adequately clothed, and poses must not be sexually suggestive.
- **Confidentiality:** Images or stories that could place the individual at risk of harm or render them vulnerable must not be shared. Information is limited to those staff who require it to perform their duties.

5. Implementation and Prevention Measures

5.1 Safe Recruitment

BV shall implement rigorous procedures to ensure all Representatives are suitable to work with vulnerable people:

- **Vetting:** Comprehensive background checks (including police or DBS checks, where legally permissible and applicable to the role) will be mandatory for all posts involving direct contact

with people at risk (including children or vulnerable adults) according to the classification described in the [Safeguarding Risk Assessment for Job Position](#).

- **References:** At least two professional references must be secured and one must specifically inquire about suitability to work with people at risk, if applicable.
- **Induction:** All new Representatives must receive an induction on the Safeguarding Policy and Code of Conduct.

5.2 Training and Awareness

All Representatives must complete regular, mandatory safeguarding training appropriate to their role and level of contact with people at risk. This training will cover:

- The Policy and Code of Conduct.
- Recognising signs and indicators of abuse.
- The correct reporting procedure.
- Local legal obligations regarding mandatory reporting.

6. Reporting Procedure and Response

6.1 What to Report

Anyone who observes, suspects, or receives an allegation or a concern of abuse, exploitation, neglect, or any breach of the organisation's policies, by a BV Representative, has a duty to report it immediately.

All reports must be made in good faith and should never be used for individual motives or be vexatious. Although you do not need proof of your suspicions, any amount of evidence provided can really help an effective investigation to all reports made.

For concerns related to the behaviour of a staff member of an organisation partner of Blue Ventures, it is encouraged to use the reporting mechanism or the partner organisation.

Should these be unsatisfactory, inappropriate or inadequate, reporters can raise concerns via BV reporting mechanism. Blue Ventures will treat these reports seriously and confidentially and will apply the following three pronged approach:

- BV will not directly investigate behaviour of staff of partner organisations
- BV will offer recommendations and support to the reporter and victim/survivor according to its capacity

- Any report could be shared with the senior management of the partner organisation and trigger a review of compliance of Safeguarding clauses and have an impact on the partnership agreement.

6.2 Reporting Channels

Concerns should be raised via the dedicated channel on the reporting platform [WhistleB/blueventures](#).

This is managed and monitored by the Concern Coordination Group (CCG), which operates according to its dedicated [CCG Term of Reference](#) and is split into three different branches: HR, Finance and Safeguarding.

Every report will be treated seriously and confidentially and ONLY be seen by selected members of the specific function you're reporting to.

6.3 Handling a Disclosure

If a person at risk (child or vulnerable adult) discloses abuse to a BV Representative:

1. **Remain Calm:** Listen carefully without interruption, judgment, or bias.
2. **Do NOT Promise Secrecy:** Explain clearly that the information must be escalated via the dedicated reporting channels and shared with the relevant CCTG branch.
3. **Record Facts:** Record exactly what was said, using the individual's own words, the date, time, and location, as soon as possible after the disclosure.
4. **No Investigation:** Do not investigate the claim yourself or ask leading questions.

6.4 Investigation and Response

The CCTG will manage all reported incidents with strict confidentiality and integrity, following a process that includes:

1. **Immediate Action:** Prioritising the immediate safety and protection of the individual concerned.
2. **Confidential Investigation:** Conducting a prompt, fair, and thorough investigation, referring to BV policies, national laws, and taking external professional advice where necessary.
3. **Disciplinary Action:** Any Representative found to have breached this policy will face immediate disciplinary action, up to and including immediate dismissal and termination of contract, and referral to the appropriate national or international legal authorities.

7. Protection for Whistleblowers

In accordance with the UK Public Disclosure Act 1998 which gives employees protection from suffering a detriment of having their contract terminated for “whistleblowing”, Blue Ventures protects all Representatives in any country unless national law exceeds this act, who report concerns in good faith from retaliation, harassment, or detriment. Any malicious or vexatious reports, however, may lead to disciplinary action against the reporter.

8. Policy Review and Governance

This policy is governed by the Blue Ventures Board of Trustees. It will be formally reviewed and updated at least annually, or immediately following any significant changes in legislation or organisational learning from a reported incident.