



Safeguarding People Policy

Caribbean Natural Resources Institute

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CANARI Safeguarding People Policy

1. Introduction

The purpose of this policy is to protect people, including partners and beneficiaries¹, from any harm² that may be caused due to them coming into contact with CANARI. This includes harm arising from the:

- conduct of CANARI staff, volunteers, interns, consultants, Associates and Elected Partners
- conduct of CANARI's downstream partners including mentors and small grantees
- design and implementation of CANARI's projects and activities

This policy is meant to inform staff, volunteers, interns, consultants, Associates and Elected Partners of CANARI as well as downstream partners, of their responsibilities in relation to safeguarding.

This policy is different to CANARI's Code of Conduct which is signed by all employees and which speaks to workplace bullying and harassment. Procedures for dealing with workplace bullying and harassment are likely to be different due to legal and statutory differences in handling workplace incidents.

It should be noted that CANARI staff are not expected to *investigate* incidents. Staff are expected to understand what constitutes a breach of this Safeguarding People Policy and to report any incidents that are made known to them in an immediate and confidential manner, following the steps outlined in this policy.

2. Safeguarding people

- 2.1.** Safeguarding, for the purpose of this policy, means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, exploitation, abuse, discrimination and neglect. For CANARI, safeguarding means protecting people, including beneficiaries and all stakeholders, from harm that may arise from coming into contact with CANARI's staff, volunteers, interns, consultants, Associates and Elected Partners, and downstream partners.
- 2.2.** Safeguarding applies consistently and without exception across CANARI's programme of work, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation, abuse, discrimination and neglect and having mature, accountable and transparent systems for response, reporting and learning when risks materialise.
- 2.3.** CANARI is committed to safeguarding and will under no circumstances tolerate bullying, harassment³, harm, exploitation (including sexual exploitation⁴), abuse (including sexual abuse⁵),

¹ Beneficiaries in this policy refer to someone who directly receives goods or services from CANARI's programme of work. Note that misuse of power can also apply to the wider community that CANARI serves and can also include exploitation by giving the perception of being in a position of power.

² Including psychological, physical and other infringement of an individual's rights. Psychological harm refers to emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

³ Harassment includes that of a physical, verbal, racist, sexual or other nature. Harassment may include actions, language (written or verbal) or objects that create an intimidating, discriminatory or hostile work environment.

⁴ The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

⁵ The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

discrimination (including racial discrimination) or neglect of anyone the Institute has contact with.

- 2.4. CANARI believes that everyone it comes into contact with, regardless of age, gender identity, race, religion, nationality, marital status, ability, sexual orientation, ethnicity, or socioeconomic background has the right to be protected from all forms of harm, exploitation, abuse, discrimination and neglect. CANARI will not tolerate harm, exploitation, abuse, discrimination and neglect by staff, volunteers, interns, consultants, Associates or Elected Partners.
- 2.5. CANARI commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

3. Prevention

3.1. CANARI's responsibilities:

- Ensure all staff, volunteers, interns, consultants, Associates and Elected Partners have access to, are familiar with, and know their responsibilities within this policy.
- Incorporate appropriate safeguarding standards to CANARI's "downstream partners" including (but not limited to) organisations and small and medium enterprises (SMEs) that may receive small grants from CANARI and individuals such as mentors who are trained by CANARI to provide capacity building support to beneficiaries of CANARI projects. Staff should ensure that downstream partners are clear on CANARI's safeguarding policy which should be annexed to small grant agreements, mentor agreements and other such documents.
- Design and undertake all its projects and activities in a way that protects people from any risk of harm that may arise from their coming into contact with the Institute. This includes the way in which information about individuals in CANARI's projects is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff, volunteers, interns, consultants, Associates and Elected Partners, and downstream partners.
- Ensure staff, volunteers, interns, consultants, Associates and Elected Partners, and downstream partners receive training on safeguarding at a level commensurate with their role in the Institute.
- Follow up on reports of safeguarding concerns promptly and according to due process.

3.2. Staff, volunteers, interns, consultants, Associates and Elected Partners, and downstream partners responsibilities:

Child⁶ safeguarding

CANARI staff, volunteers, interns, consultants, Associates and Elected Partners, and downstream partners must not subject a child to physical, emotional or psychological harm, exploitation, abuse, discrimination and neglect of any kind, including but not limited to:

- Engaging in sexual activity with anyone under the age of 18
- Sexually abusing or exploiting children

⁶ A child refers to a person below the age of 18.

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- Engaging in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding

CANARI staff, volunteers, interns, consultants, Associates and Elected Partners, and downstream partners must not subject an adult, especially an at-risk adult⁷, to bullying, harassment, or physical, emotional or psychological harm, exploitation, abuse, discrimination and neglect of any kind.

Additionally, CANARI staff, volunteers, interns, consultants, Associates and Elected Partners, and downstream partners are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding People Policy
- Report any concerns or suspicions regarding safeguarding violations by a CANARI staff, volunteer, intern, consultant, Associate, Elected Partner, or downstream partner to the appropriate staff member

4. Procedures for dealing with safeguarding reports

Receiving a report

- 4.1. Reports of a breach of CANARI's Safeguarding People Policy can reach CANARI through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If a staff member hears something in an informal discussion or chat that they think is a safeguarding concern, they should report this to the appropriate staff member in the organisation.
- 4.2. If a safeguarding concern is disclosed directly to a member of staff, the person receiving the report should bear the following in mind:
 - Listen
 - Empathise with the person
 - Ask who, when, where, what, **but not why** (the report should be received without judgement)
 - Repeat/ check your understanding of the situation
- 4.3. Staff are not expected to, nor should they, do an investigation of the incident.
- 4.4. The person receiving the report should then document the following information, using an Incident Report Form (see Annex 1).
- 4.5. The person receiving the report should forward this information to CANARI's HR Manager **immediately and within 24 hours**.

⁷ Sometimes also referred to as vulnerable adult. A person who is or may be in need of care 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.

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- 4.6. Due to the sensitive nature of safeguarding concerns, **confidentiality must be maintained** during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.
- 4.7. If the reporting staff member is not satisfied that CANARI is appropriately addressing the report, they have a right to escalate the report to the Executive Director, the Partnership's HR Committee, or to an external statutory body. The staff member will be protected against any negative repercussions as a result of this report. See CANARI's Whistleblowing Policy.

Assessing how to proceed once a report is made

- 4.7. HR Manager has responsibility for determining whether it is possible to take the report forward by considering if:
 - the reported incident(s) represent a breach of safeguarding policy
 - there is sufficient information to follow up this report
- 4.8. If the reported incident does not represent a breach of CANARI's Safeguarding People Policy, but represents a safeguarding risk to others (such as a child safeguarding incident), the HR Manager should refer the report through the appropriate channels (eg. local authorities) if it is safe to do so.
- 4.9. If there is insufficient information to follow up the report, and no way to ascertain this information (for example if the person making the report did not leave contact details), the report should be filed in case it can be of use in the future, and look at any wider lesson learning that CANARI can take forward.
- 4.10. If the report raises any concerns relating to children under the age of 18, **expert advice should be sought immediately.**
- 4.11. If the decision is made to take the report forward, the HR Manager should ensure that they have the relevant expertise and capacity to manage a safeguarding case. **If this expertise does not exist in-house, immediate assistance should be sought**, through external capacity if necessary.
- 4.12. Clarify what, how and with whom information will be shared relating to this case. Confidentiality should be maintained at all times, and information shared on a need-to-know basis only. Decide which information needs to be shared with which stakeholder – information needs may be different.
- 4.13. The HR Manager should check CANARI's obligations on informing relevant bodies when receiving a safeguarding report. These include (but are not limited to):

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- Contractual obligations outlined in project contract agreements and / or specific funder policy documents (if the incident occurred under a specific project activity or by downstream partners under a specific project)
- Statutory bodies

4.14. Some of these may require you to inform them when you receive a report, others may require information on completion of the case, or annual top-line information on cases. When submitting information to any of these bodies, think through the confidentiality implications very carefully.

Appointing roles and responsibilities for case management

4.15. CANARI's HR Manager is the point person for handling safeguarding cases within the Institute.

4.16. If the report alleges a serious safeguarding violation, the HR Manager may wish to hold a case conference. This should include:

- Person who received the report (such as the focal point, or manager)
- Executive Director and/ or Programmes Director (once neither of these persons are implicated in the case)
- Partnership's HR Committee

4.17. The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders (see below).

5. Ensuring support is provided to the survivor where needed/ requested

5.1. CANARI's HR Manager should ensure that appropriate support is provided to the survivor(s) of safeguarding incidents. Note that this should be provided as a duty of care even if the report has not yet been investigated. Support could include (but is not limited to) seeking support that is provided by professionals in the areas of:

- Psychosocial care or counseling
- Medical assistance
- Protection or security assistance (for example being moved to a safe location)

5.2. All decision-making on support should be led by the survivor.

5.3. The CANARI HR Manager and all other members of CANARI are not in positions to provide support to the survivor(s) directly, but rather should seek professional services as outlined above.

6. Assessing any protection or security risks to stakeholders

- 6.1. For reports relating to serious incidents: undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case, and develop a mitigation plan if required.
- 6.2. Continue to update the risk assessment and plan on a regular basis throughout and after the case as required.

7. Deciding on next steps

- 7.1. CANARI's HR Manager (with advice from persons consulted in the case conference as relevant) decides the next steps. These could be (but are not limited to):
 - No further action (for example, if there is insufficient information to follow up, or the report refers to incidents outside CANARI's remit)
 - Investigation is required to gather further information
 - Immediate disciplinary action if no further information needed
 - Referral to relevant authorities
- 7.2. If the report concerns associated personnel (for example, consultants), the decision-making process will be different. Although associated personnel are not staff members, CANARI has a duty of care to protect anyone who comes into contact with any aspect of its programme of work from harm. CANARI cannot follow disciplinary processes with individuals outside the Institute, however, decisions may be made for example, to terminate a contract with another organisation based on the actions of their staff.
- 7.3. If an investigation is required and CANARI does not have internal capacity, identify resources to conduct the investigation. Determine which budget this will be covered by.

8. Making a decision on outcome of investigation report

- 8.1. CANARI's HR Manager makes a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for staff misconduct.
- 8.2. If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities *unless this may pose a risk to anyone involved in the case*. In this case, CANARI's HR Manager together with other senior staff and the HR Committee will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

9. Concluding the case

- 9.1. All decisions made resulting from the case should be documented clearly and confidentially.

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- 9.2. All information relating to the case should be stored confidentially in a private folder on CANARI's electronic server (accessible by the HR Manager and Executive Director only) in accordance with CANARI's policies and local data protection laws.
- 9.3. Anonymised data relating to the case should be recorded to feed into the Institute's reporting requirements (for example, serious incident reporting to CANARI's Partnership, safeguarding reporting to funders), and to feed into learning for dealing with future cases.
- 9.4. If a case is referred to another authority, it is considered closed on CANARI's end.

Contact details

Concerns regarding a breach in CANARI's Safeguarding People Policy should be reported immediately to CANARI's HR Manager at kathryn@canari.org or by calling +1 (868) 638-6062.

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Annex 1 – CANARI Safeguarding Incident Report Form

CANARI Safeguarding Incident Report Form

Name of person making the report:	
Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above:	
Name(s) of alleged perpetrator(s):	

Description of incident(s):

Dates(s), times(s) and location(s) of incident:

Report submitted by: Name: Signature:	Report received by (CANARI HR Manager or another senior staff member as per the Safeguarding People Policy guidelines): Name: Signature:
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