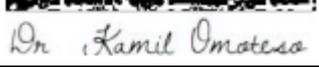


## Policy: Safeguarding

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Date approved by Board of Directors:	Jan 05 2021	Signature: 	Print name: Dr Mohamed Ashmawey
Date approved by Board of Trustees:	Jan 09 2021	Signature: 	Print name: Dr Kamil Omotesa

### Revision History & Summary of Changes

Revision History Summary of changes and justification	Changes reviewed & approved by	Date of review & approval	Date effective
Version 1- <ul style="list-style-type: none"><li>Creation of Handbook</li></ul>		Jan 05 2021 Jan 05 2021	Jan 05 2021

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# Safeguarding

## 1. Policy Statement

1.1. Human Appeal takes a 'zero-tolerance' approach to abuse and exploitation of vulnerable people, and holds clear recognition that vulnerable people are at the heart of our work. We also recognise that safeguarding is everyone's responsibility and that we have an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we work, and those within the communities we seek to help, as well as our own people who may become vulnerable.

1.2. Safeguarding is the responsibility that Human Appeal has, to ensure that our employees and volunteers, partners, vendors, operations and programmes do no harm to children, young people or vulnerable adults (together referred to as 'vulnerable people' under this policy); that they do not expose them to the risk of abuse, harm, neglect, exploitation or discrimination; and that any concerns the organisation has about the safety of vulnerable people within those communities in which we work, are dealt with and reported to the appropriate authorities.

1.3. Safeguarding is also the responsibility that the organisation has for protecting its employees and volunteers when they are vulnerable, for example, when ill or they become at risk of harm or abuse.

1.4. Child protection is a core part of, but not separate to, safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or other acts, influences or omissions. It also includes measures and structures designed to prevent and respond to abuse.

1.5. Over recent years, there has been increasing recognition of the way in which children, young people and vulnerable adults can be at risk of abuse, harm, neglect, exploitation or discrimination by those who are in positions of trust and power over them, including where an organisation is providing humanitarian relief to vulnerable people. Consequently, like any other humanitarian relief or development organisation, we must be proactive to ensure that no harm results from our work activities nor from the contact with beneficiaries and stakeholders that our employees, volunteers and other representatives have in relation to their work on behalf of Human Appeal.

1.6. The humanitarian work that Human Appeal is engaged in requires many employees, volunteers and others working for and on behalf of Human Appeal to engage with children, young people and vulnerable adults, either directly or indirectly, in the provision of that relief work and in the establishment of self-sustaining development programmes, as a means of bettering the lives of those vulnerable people.

1.7. Human Appeal applies the following key principles to protect vulnerable people:

1.7.1. Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

1.7.2. The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.

1.7.3. We will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or vulnerable adult is at risk or respond with appropriate rigour when a vulnerable person has actually been harmed.

1.7.4. We will ensure that employees and volunteers are inducted in our Safeguarding Standards and procedures as a key part of the recruitment and on boarding process, and receive regular briefings and refresher training to maintain their awareness of the subject matter.

1.7.5. We will ensure that all partner organisations are informed of how Human Appeal manages safeguarding and take all reasonable steps to ensure that they operate in compliance with our safeguarding standards. When working with or through partners or subcontracted agencies, Human Appeal will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.

1.7.6. We recognise that an element of safeguarding risk will always exist within our work, and while we may never be able to totally remove this, we need to do all we reasonably can to reduce it or limit its impact. We require our people to maintain their awareness and watchfulness for signs of any safeguarding issue, and to raise it within our reporting procedures so that responsive action can be taken.

1.7.7. We respect confidentiality and have a responsibility to protect sensitive personal data. Information should only be shared and handled on a 'need to know' basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.

1.8. Human Appeal seeks always to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. We recognise that there are many different ways of thinking, and taking care of vulnerable people and making sure they are protected. It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work. As an international organisation, we endorse the United Nations Convention on the Rights of the Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and it's Article 19 which accords equal rights to protection for children from abuse. Every child matters everywhere in the world. Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

## **2. Policy Objectives**

2.1. To provide clarity to everyone who works for, on behalf of, or in partnership with Human Appeal on how they should engage with children, young people and vulnerable adults.

2.2 To help us make sure that employees, volunteers and other representatives who will interact with children, young people and vulnerable adults, are themselves protected and supported in such activity.

2.3. To help us to have a common, shared understanding of safeguarding issues, develop good practice across the diverse and complex areas in which we operate and thereby increase accountability in this crucial aspect of our work; and,

2.4. To equip our people to recognise safeguarding issues and to be able to respond appropriately.

## **3. Definition of Terms**

3.1. Abuse – a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult, or by failing to act to prevent harm. Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

3.2. Child Exploitation – can include forced marriage, domestic servitude such as cleaning, childcare, cooking, forced labour in factories or agriculture, criminal activity such as pickpocketing, begging, transporting of drugs, selling stolen property or forgeries, or bag theft

3.3. Child Sexual Exploitation (CSE) – a type of sexual abuse in which children are sexually exploited for money, power or status. Children of young people may be tricked into believing that they are in a loving, consensual relationship. They may be invited to parties and given drugs or alcohol, or they may be groomed online. Some children and young people are trafficked into or within a country for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

3.4. Discriminatory abuse – abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

3.5. Financial or material abuse – includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

3.6. Harm – The Children Act 1989 defines 'harm' as "ill-treatment or the impairment of health or development". 'Development' means physical, intellectual, emotional, social or behavioural development; 'health' means physical or mental health; and 'ill treatment' includes sexual abuse and forms of ill-treatment which are not physical.

3.7. Neglect – the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

3.8. Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

3.9. Psychological abuse – includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person’s developmental capability. It may involve bullying (including cyberbullying), or the exploitation or corruption of a vulnerable person.

3.10. Sexual abuse – involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

3.11. Child – anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

3.12. Vulnerable adult – a person, 18 years of age and above, who by reason of disability, age, gender, social and economic status, or illness, or the context they are in, may be unable to take care of or to protect him or herself against abuse, harm or exploitation. A person over age 18 years “who is or may be in need of community care services by reason of mental or other disability or illness.”

3.13. Young people – individuals generally aged 15 to 25 years; that whilst spanning both categories of ‘children’ and ‘adults’, also recognises young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

3.14. Vulnerable person/people – for the purposes of this policy this is an umbrella term which covers children, young people and vulnerable adults.

3.15. Beneficiary – someone in receipt of assistance. Alternatively referred to as a member of the affected population, person we seek to assist, person affected by crisis or rights holders.

3.16. Case Management – following the appropriate policies and procedures to determine the outcome of a report or an investigation of any safeguarding complaint.

3.17. Child Protection – the prevention of, and response to abuse, neglect, exploitation or violence against a child (and refers to a subset of children’s rights). It also describes the work being undertaken to strengthen laws, policies and systems that are designed to protect children.

3.18. Code of Conduct – an agreement on rules or behavioural performance for a group or organisation. Human Appeal has its own internal Code of Conduct that applies to all staff, and any failure to observe that Code of Conduct may result in disciplinary action being taken, up to and including dismissal.

3.19. Complainant – an individual making a complaint, including a survivor of sexual exploitation, abuse or harm, or someone becoming aware of some wrongdoing or concerned about some possible wrongdoing.

3.20. Complaint Mechanism or Procedure – processes which allow and encourage individuals to report a complaint or concern that is, or could be, a breach of Human Appeal’s policies or Code of Conduct. A mechanism could include an internal post-box, a whistleblowing policy, or a designated focal point.

3.21. Confidentiality – the restriction of access to, and dissemination of, information. Confidentiality helps to create an environment in which people are more willing to disclose or provide information, and this helps to build trust in the system and the organisation.

3.22. Disclosure – the moment when a child, young person or vulnerable adult tells a responsible adult about the abuse they have suffered or are suffering.

3.23. Protection from Sexual Exploitation and Abuse (PSEA) – a term used by the UN and NGO community to refer to measures taken to protect children, young people and vulnerable adults from sexual exploitation and abuse by their own staff, representatives and associated personnel.

3.24. Safeguarding Complaint – a specific concern raised by someone who has witnessed or experienced a failure by Human Appeal or its representatives to meet its values, Code of Conduct or organisational policies, and/or been alerted to such malpractice by others.

3.25. Whistleblowing – an organisational policy which aides and supports staff in reporting specific concerns or suspicions of misconduct or malpractice by colleagues.

3.26. Staff – In the context of this Policy, the term ‘Staff’ shall be taken to include employees, volunteers, trustees and other others such as freelance personnel who are engaged by Human Appeal in its work.

## **4. Scope**

4.1. This policy applies to all staff working for Human Appeal, encompassing Trustees, Directors, employees, freelancers, volunteers and also those persons working for contractor and partner organisations on behalf of Human Appeal.

4.2. This policy demonstrates how Human Appeal will meet its legal obligations and reassure volunteers, employees, partners and members of the public:

- on what they can expect Human Appeal to do to protect and safeguard vulnerable people;
- that they are able to safely voice any concerns through an established procedure;
- that all reports of abuse or potential abuse are dealt with in a serious and effective manner;
- that there is an efficient and robust recording and monitoring system in place;
- that employees, volunteers, subcontracted agencies and partners receive appropriate induction on safeguarding;
- that a rigorous ‘safe’ recruitment procedure is in place; and,
- that specific, safeguarding-focused procedures are in place that apply to those that work or have contact with, either directly or indirectly, children, young people or vulnerable adults.

4.3. This policy constitutes Human Appeal’s global policy. Whilst it is recognised that local legislation may vary from country to country, this policy identifies our minimum standards and may exceed the requirements of local legislation. Any development of local policy will be based on this Policy.

## **5. Roles and Responsibilities**

5.1. Everyone within the scope of this Policy will:

- read, understand and adhere to the this Safeguarding Policy;
- strive to promote our zero-tolerance approach to discrimination, sexual harassment and abuse in all working environments;
- strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty;
- place the safety and welfare of vulnerable people above all other considerations;
- report any concerns they may have about the welfare of a child or other vulnerable person;
- report any concerns they may have about the behaviour of a Human Appeal representative in relation to safeguarding;
- in a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why; and where possible ensure that another adult is in sight and that the child or young person knows another adult is around.

5.2. No-one working with Human Appeal will:

- sexually harass, assault or abuse another person;
- physically harass, assault or abuse another person;
- emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade;
- condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe;
- develop, encourage or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive;
- act in ways that may be violent, inappropriate or sexually provocative;
- agree with a child to keep a secret which has implications for their safety or the safety of other young people.

5.3. Trustees – hold ultimate accountability for safeguarding as an integral part of the cultural environment within Human Appeal that embodies safeguarding. They will at all times have an appointed safeguarding executive on the board.

5.4. The Chief Executive Officer - holds responsibility for the existence and implementation of this Policy, and he/she delegates authority for its implementation in any country with the Country Director or Head of Mission of that country, and to the Director of People & Culture in the UK.

5.5. Managers – Managers at all levels are responsible for ensuring employees, volunteers, consultants, visitors and partner organisations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

5.6. P&C Department – are responsible for maintaining the validity of this policy and ensuring that it is reviewed periodically to ensure that it remains valid, as well as managing any disciplinary process involving a safeguarding issue.

#### 5.7. Safeguarding Lead

5.7.1. Human Appeal has an appointed UK (head office based) designated person who will lead on child protection and child safeguarding concerns across Human Appeal including its overseas operations. The Safeguarding Lead is responsible:

- for ensuring that HA safeguarding arrangements are maintained as appropriate and robust, including input to this Policy and its review, and ensuring its periodic review and updating, along with associated procedures;
- for ensuring that country offices have local policy and procedures in place to deal with safeguarding concerns, including direct complaints;
- for informing and liaising with any external authority/organisation that should be involved in any safeguarding matter, including where a criminal act is alleged within the UK, the Police;
- in the case of a safeguarding issue involving a child, for being the point of contact for the parents or guardian of the child;
- in the case of a vulnerable adult, for being the point of contact of a carer if one is appointed for that vulnerable person;
- for managing the process initiated to deal with any safeguarding issue, to a proper conclusion, including the associated record-keeping.

5.8. Country Child Protection Lead – each Country Director/Head of Mission will designate a staff member from within the Country team to take the lead role for child protection and safeguarding within the operations of that country.

## 6. Policy Provisions

### 6.1. Staff Recruitment:

6.1.1. Human Appeal will ensure that robust processes are in place to manage their recruitment and selection, taking due cognisance of the role an individual will fulfil within Human Appeal (risk assessment), so that appropriate including reference checks and DBS screening checks can be applied, so as to ensure, as far as is possible, that personnel who may realistically pose a safeguarding risk are not engaged.

### 6.2. Staff Training:

6.2.1. Human Appeal will design and implement training interventions to build staff knowledge of the safeguarding subject, to ensure that they understand the position of Human Appeal as regards safeguarding, hold a sufficient level of knowledge and understanding of the subject, and can exercise their personal obligations in respect of safeguarding whilst engaged by Human Appeal. Staff will receive periodic refresher training to ensure that their knowledge remains current and relevant.

### 6.3. Risk Assessment:

6.3.1. Risk assessment in respect of safeguarding shall form an integral part of governance within the organisation, and in particular a formal risk assessment should form part of any project governance or where an operational aspect of the organisation's work involves vulnerable people.

### 6.4. External Stakeholders including Donors:

6.4.1. Human Appeal will ensure that its approach to safeguarding is clearly and visibly stated so as to be accessible to any external stakeholder, including its donors, so they can be clear about where, as an organisation, HA stands on the matter of safeguarding, and how it will meet its obligations.

#### 6.5. Partner Selection and Supervision:

6.5.1. Pre-qualifying and other selection criteria will be applied to the choice of partner organisations such as local/country partners and suppliers, to ensure that such organisations apply sufficient emphasis on their own approach to safeguarding, and Human Appeal can be reasonably assured of their approach prior to their appointment and engagement.

6.5.2. Human Appeal will apply appropriate arrangements for the ongoing monitoring and review of partner performance to ensure HA of their ongoing safeguarding compliance commitment and obligations.

#### 6.6. Designated Safeguarding Lead:

6.6.1. Human Appeal will appoint a Safeguarding Lead, ensuring that all staff members are made aware of the named person and the process for reporting any concern to the Safeguarding Lead. The Safeguarding Lead will:

- be responsible for ensuring that the Safeguarding Policy is regularly reviewed and maintained as fit-for-purpose and that safeguarding is promoted openly across the organisation;
- ensure that each country in which HA operates has a designated Country Child Protection Lead; and that each country adopts this Policy to recognise local requirements, and ensures it has the processes in place to manage safeguarding in accordance with this Policy;
- oversee the safeguarding training across the organisation to support the implementation of this Policy and ensure that safeguarding is properly embedded in the culture and values of the organisation;
- ensure that robust reporting mechanisms are in place for any person to readily identify how to make a Safeguarding Complaint and submit such a Complaint;
- be the recipient of any Safeguarding Complaint and ensure that there is robust recording and investigation of any complaint, to establish the facts, and deal with the matter in a manner that satisfies the objectives of this Policy;
- lead the learning process and implementation of such derived learning, from any safeguarding incident;
- act as the focal point for advice and assistance to others within Human Appeal on matters of safeguarding;
- make referrals to, and liaise with, external agencies and authorities to enable safeguarding matters to be properly dealt with.

#### 6.7. Organisation Behaviour:

6.7.1. All beneficiaries, including children, young people and vulnerable adults, are to be treated with respect by staff, recognising their right to personal privacy.

6.7.2. Staff should not spend time alone with children or vulnerable adults, instead activities should be planned so that more than one person is present or, at least, with other people within sight and hearing.

6.7.3. Inappropriate physical contact with children, young people and vulnerable adults should be avoided, especially that which is forbidden or advised against in Islamic teaching.

6.7.4. Project activities should be planned and organised so that safeguarding risks are minimised.

6.7.5. Staff must not make racist, sexist or other discriminative remarks, especially in front of vulnerable people.

6.7.6. Staff must take care not to show favouritism towards particular children or young people.

6.7.7. Sexual relationships between project workers and beneficiaries are strongly discouraged as such relationships are based on inherently unequal power dynamics, and would undermine the integrity of Human Appeal's work to help vulnerable people.

6.7.8. Staff must take care not to put themselves in a position either by their words or actions where their intentions could be misinterpreted.

6.7.9. Staff must always be aware that their actions may be misinterpreted, no matter how good their intentions are, so must consider how others will perceive their actions.

6.7.10. Any requirement to apply a sanction such as through the disciplinary procedure must be carried out in such a way as to avoid humiliation, through applying a considered and sensitive approach to such matters.

6.7.11. Whilst safeguarding matters will always be dealt with in a confidentiality manner, information will be shared as is deemed necessary, taking account of the need to balance the interests of all concerned as well as protect the organisation.

6.7.12. Staff should be guided in all things, by the values of Human Appeal.

#### 6.8. Safeguarding Complaints:

6.8.1. Any staff member can raise a concern about the behaviour or conduct of another individual where it appears to fall short of the requirements of this Policy, such that safeguarding lies at its heart. In fact, our approach to safeguarding is that it mandatory for any staff member to report concerns, suspicions, allegations or incidents which indicate abuse or potential abuse or exploitation of vulnerable people, or where there is a suggestion that this Policy has been breached. That does not require the staff member to make any decision about whether or not the abuse has actually taken place; having grounds to reasonably believe that abuse has occurred or that there is a real threat of abuse occurring is enough to raise a Safeguarding Complaint. If in doubt, then the staff member should have a confidential discussion, in person or via telephone, with the Safeguarding Lead.

6.8.2. To ensure that any safeguarding complaint can be readily made, a number of channels have been created by which a Safeguarding Complaint, regardless of where the complaint is originating geographically, can be submitted directly to HA's Safeguarding Lead.

- Email – [speakout@humanappeal.org.uk](mailto:speakout@humanappeal.org.uk)
- Telephone – 07933994407
- In the Human Appeal Head Office – mailboxes can be found in toilets which allow Safeguarding Complaints to be posted (anonymously if necessary)

6.8.3. A Complainant in a country operation may raise the matter directly with the designated Country Child Protection lead in that country.

6.8.4. Alternatively, in the absence of the Safeguarding Lead, or if the person making the disclosure feels more comfortable with such an approach, then any safeguarding complaint or concern may be raised with a senior manager of the organisation, and that individual has an obligation to deal with the matter sensitively and confidentially.

6.8.5. A person who makes a complaint in relation to a safeguarding issue is recognised as making a protected disclosure (whistleblowing) and is protected from discrimination or victimisation in relation to having made such a disclosure. However, where such a complaint is proven to have been made in bad faith, then no such protection will exist.

6.9. Recognising a Safeguarding Concern:

6.9.1. A safeguarding concern or issue itself may come to light through a number of channels.

- A child, young person or vulnerable adult may make an allegation directly.
- A vulnerable person may make a comment which seems to suggest the existence of a safeguarding issue.
- A vulnerable person may display atypical signs of physical abuse.
- A person may behave in such a way that suggests there are abuse issues involved.
- A staff member may behave in such a way that he/she is not suitable for working with vulnerable people.
- An act or acts of abuse may be witnessed.
- A staff member may become aware of, or hear a rumour of abuse.

**6.9.2. Appendix 1 provides some assistance in the recognition of signs and symptoms of abuse.**

6.10. Sexual Exploitation:

6.10.1. Human Appeal adheres to the core principles of the United Nations' Task Force on Preventing Sexual Exploitation and Abuse in Humanitarian Crises 2002 in their application to project implementation in relation to children, families and communities, and must apply irrespective of whether or not there is an emergency situation.

- Sexual exploitation and abuse, when proven, is an act of Gross Misconduct which will result in termination of employment.
- Sexual activity with a child or a vulnerable adult is prohibited by Human Appeal, regardless of the criminality of the offence taking account of the age of majority or consent as defined by local laws. A mistaken belief regarding child's age will not be accepted as a defence.
- Any exchange of money or benefit in return for provision of sex or sexual favours or any other form of humiliating, degrading or exploitative behaviour are strictly prohibited, and will be dealt with under the Human Appeal Disciplinary Policy.

6.11. Child Protection – National and Local Guidance on Safeguarding:

6.11.1. Human Appeal has a statutory responsibility that governs its contact with children within its work, so as to safeguard and promote the welfare of children (section 11 of the Children Act).

6.11.2. There is a substantial amount of information that provides sound guidance as to the application of safeguarding to children, notably:

- The Children Act 1989;
- The Children Act 2004;
- Every Child Matters;
- Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children (HM Government, 2010);
- Human Rights Act (1998);
- Criminal Justice & Courts Services Act (2000); and,
- The Protection of Children Act (1999).

6.12. Social Media:

6.12.1. It must be recognised that the use of social media has the potential to actually create exploitative situations regardless of good intent, particularly through use of photographs, videos, or articles where particular individuals are personally

identified, and in particular where that individual is a child, young person or vulnerable adult, and where individual permission for any depiction to be used in such requires an even more diligent approval process.

6.12.2. Whilst it is natural to use depictions of human suffering within the publicity materials related to the work of Human Appeal, as they relate to the purpose of the organisation, care must be taken that such depictions themselves are not exploitative of a vulnerable person, and that permissions are obtained based on having given full information to those about the intended use of the depictions involving them, including the parents or guardian of any child.

6.12.13. When the use of social media involves a child, young person or vulnerable adult, then reference must be made to the HA Social Media Policy for full guidance.