



LUMOS GLOBAL SAFEGUARDING POLICY FOR CHILDREN AND ADULTS AT RISK

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1. INTRODUCTION

- 1.1 Lumos recognises that the rights of safety and security are aligned with its core mission of ending institutionalisation. Effective and robust safeguarding sit at the heart of our mission and values, and accordingly, Lumos is committed to ensuring the safety and protection of children and adults at risk in all its work. This policy provides a global framework of key principles, guidelines and practices that underpin individual and organisational practice and the implementation of safeguarding across all Lumos offices and contexts. This policy sets out the minimum standards and expectations. It is based on global best practice standards as well as UK and international law.¹

2. SCOPE AND APPLICATION

- 2.1 This policy applies to all children and adults at risk who are involved with, come in to contact with, or are impacted by Lumos' work, programmes and activities. This includes direct work, as well as work carried out by others on Lumos' behalf.
- 2.2 This policy and its contents are applicable to every person who is engaged with Lumos, whether or not they are working directly with children or adults at risk, including trustees, staff, and associates² at all times. All are required to read this policy and sign a statement of commitment to adhere to its principles and procedures (Appendix A).
- 2.3 It is the responsibility of HR (in the UK) or the Designated Safeguarding Lead (DSLs) or HR Focal Point (other countries) to ensure all staff sign the statement of commitment when starting work with Lumos. Project Leads, under (Country) Directors and with guidance from DSLs will be responsible for sharing ~~the external version of~~ this policy with partners, contractors, other associates and grantees, obtaining a signed commitment to its principles and procedures as part of contracts or MOUs as appropriate, as well as undertaking any safeguarding risk assessments and due diligence for work directly or indirectly involving children and adults at risk. Records of commitment to the policy will be stored by in-country HR focal points.
- 2.4 This policy sets out the overall safeguarding approach, principles and standards which must be adopted in all Lumos activities globally. However, Lumos recognises that there are differences in context and that the application of this policy needs to be contextualised to ensure effective, appropriate and proportionate application with partners and in new and changing contexts. Lumos notes that due to differences in statute and context, some practices and procedures may vary and therefore require adaptation from country to country. The specific application of this policy in countries where Lumos operates, including any variations, shall be outlined in the country entries in Section 9.

3. GUIDING PRINCIPLES AND COMMITMENTS

- 3.1 **ALL CHILDREN AND ADULTS AT RISK HAVE THE RIGHT TO BE SAFEGUARDED:** Lumos is committed to ensuring that all children and adults at risk who are involved with our work, programmes or activities, are protected regardless of age, disability, gender, race, religion, sexual orientation, identity, marital or economic status. Lumos is committed to addressing and overcoming barriers, including discrimination and communication, that may prevent effective safeguarding.
- 3.2 **PROMOTE, PREVENT AND PROTECT:** Lumos will promote the welfare of children and adults at risk by advocating for their needs and considering their wellbeing in all aspects of our work, work to prevent abuse

¹ Lumos' work is underpinned by the provisions enshrined in the UN Convention on the Rights of the Child, the UN Convention on the Rights of People with Disabilities and other regionally relevant conventions and declarations including: the European Convention on Human Rights, the African Charter on the Rights and Welfare of Children, the Arab Charter on the Rights of the Child, inter alia. This is the international framework, supplemented by countries' domestic legislation and government guidance, which outlines and supports safeguarding duties and responsibilities.

² Associates, in the context of this policy, are individuals who are consultants or volunteers. The term volunteer includes Lumos trustees, ambassadors, and self-advocates.

from occurring through appropriate risk assessment and management, and seek to protect those who are at risk of or have been abused by responding promptly and effectively to concerns.

- 3.3 **LUMOS IS A CHILD CENTRED AND TRAUMA INFORMED ORGANISATION:** Lumos recognises the great responsibility we hold when we engage with children, adults at risk and/or the systems in which they live and receive care. Lumos seeks to be aware of power imbalances and the ways in which people in vulnerable situations, particularly those who are likely to have experienced trauma, abuse or harm via institutionalisation, will require additional care and support. The welfare and best interests of children and adults at risk is the paramount consideration in any circumstance and Lumos seeks to integrate knowledge about trauma into its policies, procedures and practice.
- 3.4 **PARTICIPATION:** The views, wishes, feelings, input and positive participation of children, adults at risk and other families or communities we serve is of the utmost importance. We strive to always consult and seek feedback to ensure we are promoting safe and inclusive environments and programmes. Active engagement of stakeholders through participatory activities is also a way to increase understanding of the right to be safe from harm and strengthen stakeholders own protective capacities.
- 3.5 **AWARENESS AND VIGILENCE:** Lumos recognises that abuse and harm can happen anywhere and can involve anyone. We are committed to responding quickly and sensitively to ensure that all children and adults at risk are protected.
- 3.6 **SAFEGUARDING IS EVERYONE'S RESPONSIBILITY:** Safeguarding, in all its forms, is both an individual and shared responsibility across the whole organisation. Everyone has a role to play. We hold our staff and associates to high standards and provide regular training to support their safeguarding skill and knowledge. Practice is monitored and reviewed as part of supervision and/or performance management. Poor practice and/or a failure to adhere to this policy is a serious matter that will be promptly investigated and may lead to disciplinary action and/or termination.
- 3.7 **SAFEGUARDING AS A GOLDEN THREAD THROUGH ALL WORK:** Lumos embraces the “do no harm” principle and ensures that high quality, best practice safeguarding, including comprehensive risk assessment and risk management is embedded in all our functions including fundraising, advocacy, communications, evidence and programme design, delivery and reporting. We hold high standards not just for ourselves, but also our associates and partners by ensuring mechanisms are in place for effective safeguarding due diligence and ongoing monitoring, reporting and review of downstream partners.
- 3.8 **BUILDING A CULTURE OF SAFEGUARDING EXCELLENCE:** All individuals and levels of the organisation are committed to promoting an internal culture of accountability, openness, transparency and continuous learning in relation to safeguarding. We recognise that staff safeguarding is linked to effective recognition of and response to safeguarding concerns for children and adults at risk and aim to provide for the safety and wellbeing of all by promoting a culture of speaking up and taking concerns seriously.

4. KEY DEFINITIONS

- 4.1 **Child:** For the purposes of this policy, in line with the UN Convention on the Rights of the Child, a child is defined as any person under the age of 18. This definition applied to all of Lumos’ work, regardless of whether the legal age varies in any country or legal context.
- 4.2 **Adult at Risk:** an adult who is experiencing, or is at risk of, abuse, neglect or exploitation because of being in a position of social disadvantage due to one or more factors. The result is individual, and sometimes collective, vulnerability due to differences in power. These factors include (but are not limited to) poverty, migrant status, sex, gender identity, sexual orientation, disability, mental health, caste, religion, health, and age.³ For Lumos’ work, adults at risk can include self-advocates over the age of 18, as well as other adults (including carers) and young people over the age of 18 Lumos may come in to contact as part of our work in institutions or communities.

³ Based on World Health Organisation definition of vulnerable groups

- 4.3 **Safeguarding:** Safeguarding broadly refers to an organisation’s responsibility to keep people safe, including both children/adults at risk and its own staff.
- 4.4 **Child and Adult at Risk Safeguarding:** a subset of safeguarding that refers to an organisation’s responsibility to ensure they have effective policies, strategies and practices to:
- a. Proactively prevent children/adults at risk from experiencing harm or abuse as a result of contact with the organisation or those carrying out work on its behalf
 - b. Know how to recognise signs of abuse and harm, and ensure any concerns about a child or adult at risk are taken seriously, responded to and reported to the appropriate authorities where necessary.
- 4.5 **Child Protection:** child protection is broad term that overlaps with safeguarding. It can refer broadly to the actions an organisation or authority takes to prevent and respond to abuse. The term can also be used to address a specific concern or instance that a particular child is at risk of significant harm due to her or his contact with staff, partners, programmes, services, activities or via unrelated risks posed in the community. Child protection programming are programmatic initiative and measures desginted to prevent and respond to abuse, neglect, exploitation and other forms of harm against children. It is a key component of broader programmatic areas aimed to ensure children’s rights to well-being, safety and dignity. Safeguarding and child protection programming are not the same, but do overlap. Safeguarding, in the context of Lumos, refers specifically to our organisational responsibilities. Child Protection and Child Protection Programming refer to our wider work and externally facing activities. They overlap where we identify individual or specific cases of harm, abuse or exploitation and must take action to respond and ensure the protection of the individual at risk.
- 4.6 **Harm and Abuse:** harm is any action which may negatively impact a child/adult at risk’s sense of safety or wellbeing. Harm can be caused intentionally and unintentionally. Abuse is harm which is so severe or persistent that it is deemed “significant” and is likely to have a lasting effect on the person’s health or development. Abuse usually happens within the context of a relationship, particularly a relationship where there is a difference in power. Types of abuse and harm are defined and explained further in Section 6 of this policy.
- 4.7 **Child Abuse:** this constitutes all forms of physical and/or emotional ill-treatment, including sexual abuse, neglect, negligent treatment or commercial or other exploitation, whether online or in-person, resulting in actual or potential harm to the child’s health, survival, development or dignity.
- 4.8 **Adult Abuse:** a single or repeated act or lack of appropriate actions, occurring within any relationship where there is an expectation of trust, which causes significant harm or distress to a person in a vulnerable situation age 18 or older. This includes physical and sexual abuse, as well as neglect and exploitation resulting in potential or actual harm.

5. KEY SAFEGUARDING ROLES AND RESPONSIBILITIES

- 5.1 Everyone in Lumos contributes to effective safeguarding and must understand their responsibilities within the context of their role, and their obligation to report Safeguarding concerns. All managers must ensure that their reports are aware of the policy and reporting procedures and address any issues of non-compliance or poor practice. Failure to comply with Lumos Safeguarding Policy is a serious issue and can lead to disciplinary action or termination. All staff, associates and partners should be aware of the following expected responsibilities and standards. Further details can be found in the Appendix C: Guidelines for Working with Children and Adults at Risk and Conduct Within Communities.

Lumos staff, associates and partners must ALWAYS

- Help create a safe work environment by treating everyone (children, adults at risk, members of the wider community and colleagues) with respect and maintaining professional boundaries at all times
- Make sure their work is done in a safe way that will not cause anyone harm e.g embed Safeguarding in their activities as appropriate
- Report any Safeguarding concerns to a Designated Safeguarding Lead or the Global Safeguarding Lead
- Line managers and senior staff have an additional responsibility to role model positive behaviours, encourage reports, and support their teams to embed Safeguarding

Lumos staff, associates and partners must NEVER:

- Engage in any form of abuse, harm, exploitation, violence, coercion or threatening behaviour – or act in a way that makes anyone (children or adults) feel unsafe
- Engage in behaviour that may be considered dangerous, reckless or may place the physical or psychological safety of children or adults at risk.
- Engage in a sexual or romantic relationship with anyone in the community where Lumos/partner is working to deliver aid, regardless if they are over the age of 18.
- Exchange or attempt to exchange money, employment, goods or services for sexual acts. Staff and associates are prohibited from buying sex
- Take Lumos goods/aid for themselves, distribute them to anyone other than those on the distribution list, or attempt to exchange them for sexual favours or money (e.g a bribe)

5.2 The following Lumos groups and individuals will have specific safeguarding responsibilities related to the implementation and monitoring of this policy. Names and contact details of all key safeguarding staff can be found in Appendix B.

5.3 **Board of Trustees:** The Board of Trustees carries the ultimate responsibility for safeguarding at Lumos. Safeguarding both staff and children/adults at risk is a governance priority. The Board of Trustees will promote a fair, open and positive culture and ensure all involved feel able to report concerns, confident they will be heard and responded to. The Board will ensure that appropriate safeguarding policies and procedures are in place and undertake ongoing review and monitoring of safeguarding within Lumos.

5.4 **Nominated Trustee for Safeguarding:** The Nominated Trustee for Safeguarding has responsibility for providing feedback to the Board on the effective implementation of the safeguarding policy, practices and procedures within Lumos. The Nominated Trustee for Safeguarding is part of the Programmes and Safeguarding Committee, and will receive quarterly reports on safeguarding cases and functions to ensure high quality safeguarding and that all learning from individual cases is translated to organisational wide policy and practice changes, where necessary. He/she will provide advice and guidance on complex or high-risk cases and escalate these to the Board as necessary. The Nominated Trustee will act as a key point of contact for the Global Safeguarding Lead and the Chief Executive, as well as be the point of receipt for any safeguarding concerns regarding the Global Safeguarding Lead or Chief Executive.

5.5 **The Safeguarding Working Group (SWG)** is made up of key senior leaders and safeguarding staff and is responsible for monitoring and providing critical advice on the quality and effectiveness of safeguarding for children and adults at risk throughout Lumos. The SWG will meet quarterly to review safeguarding cases, as well as key safeguarding functions/mechanisms including safer recruitment, training, reporting and recording and adherence to legal reporting requirements.

5.6 **Chief Executive:** The Chief Executive exercises organisational oversight regarding Lumos' safeguarding policy, procedures, practice and performance. Together with the Global Safeguarding Lead, the Chief Executive will prepare an annual report for the Board on safeguarding, reviewing practice, effectiveness and highlighting areas for improvement. The Chief Executive will notify the Nominated Trustee for Safeguarding immediately or as soon as possible thereafter, after learning of any safeguarding allegations relating to Lumos staff and/or associates and/or any safeguarding issues/concerns which are likely to impact reputationally on Lumos.

5.7 **Global Safeguarding Lead:** The Global Safeguarding Lead (GSL) is responsible for ensuring a consistent, effective and coordinated organisational approach to child and adult at risk safeguarding. He/she will provide formal and informal consultation and advice regarding individual cases as well as any general safeguarding concerns, in addition to having regular contact with the Designated Safeguarding Leads (DSLs). He/she will support safeguarding training and ensure that effective safeguarding practice is promoted and implemented across all areas of the organisation. The GSL will be the single point of escalation for all safeguarding concerns reported to DSLs and will monitor all ongoing cases, ensuring good practice, legal compliance and high quality, confidential reporting and recording practices. The GSL is responsible for providing quarterly updates to the Safeguarding Working Group and will escalate high level safeguarding concerns immediately to the Chief Executive and/or the Named Trustee for Safeguarding.

- 5.8 **Directors:** All Directors are expected to lead by example and help promote good safeguarding practices amongst staff. They are responsible for ensuring that their staff/reports adhere to the practices and procedures laid out in this policy and that the policy is implemented in line with local procedures and statute. Directors will appoint appropriate Designated Safeguarding Lead(s) and deputise in their absence. Directors will ensure staff are aware of their area's Designated Safeguarding Lead(s) and report to the Global Safeguarding Lead any systemic concerns in their area of work which may impact on effective safeguarding implementation. Directors should liaise regularly with their area's DSL(s) to ensure a good understanding of key safeguarding considerations and concerns.
- 5.9 **Designated Safeguarding Leads:** Designated Safeguarding Leads (DSLs) will be the key safeguarding focal points in their respective country offices, central Lumos functions, or remote programmes/projects and are responsible for promoting awareness of safeguarding and best practice for their area of work in line with this policy. All DSLs must be familiar with Lumos's Global Policy on Safeguarding Children and Adults at risk, as well as related policies and guidance, and help monitor its implementation for their area of work. Country office or remote country programme DSLs should have good knowledge of their country's safeguarding and child protection laws and procedures, ensuring that they are documented and regularly reviewed. Central function and remote programme/project specific DSLs should have good knowledge of safeguarding issues and associated policies and procedures which relate to their area of work. DSLs will receive annual advanced safeguarding training from the Global Safeguarding Lead (GSL) and will provide regular updates regarding safeguarding practice and implementation within their office or area of work. They may also contribute to the delivery of safeguarding training for their respective area, with support from the GSL. DSLs will be the first point of contact for staff regarding any safeguarding concerns and will:
- Make an initial assessment of the concerns and escalate in line with the Guidance on Reporting and Escalation of Safeguarding Incidents and Cases, ensuring all concerns are reported as soon as possible and always within 24 hours.
 - Provide advice and guidance on next steps to staff, with support from the GSL
 - Ensure all activities relating to Lumos' response to safeguarding incidents/concerns are properly recorded and stored
 - Participate in and contribute to safeguarding audits and other monitoring activities that help ensure continuous learning and improvement, at the direction of the GSL
 - Keep their area Director informed of cases and concerns, with respect for confidentiality

6. RECOGNISING ABUSE AND HARM

- 6.1 Customs, culture and national legislation lead to different interpretations of what constitutes 'abuse' and the response undertaken by statutory bodies. Lumos works in countries with varying approaches to responding to safeguarding concerns. Lumos' response must be mindful of the particular circumstances which prevail in the country in which they have occurred, however, **the concepts of abuse as defined in the policy, and the procedures to follow must be adhered to.** Notwithstanding the variations which exist, it is important that staff and associates are clear about what Lumos means by abuse and neglect and the actions it expects staff and associates to take to avoid and respond to these abusive circumstances, consistent with the welfare of affected children/adults at risk. It should be noted that Lumos draws all its definitions of abuse from international conventions, guidance documents and agreed best practices, which have been developed with the participation of many countries across the globe. Section 9 addresses the situation in each of the principal countries in which Lumos is working.
- 6.2 It is important that Lumos staff understand what constitutes abuse and how it can occur. Someone may abuse or neglect a child/adult at risk by inflicting harm, or by failing to prevent harm. Children/adults at risk may be abused in a family, in an institution or in a community setting by those known to them or, more rarely, by others. Abuse can be perpetrated in person or remotely via social media or the internet. Children and adults at risk may be abused by an adult or adults, or another child or children. Remember that anyone can perpetrate abuse and harm, including parents/carers, children and/or young people, wider members of the community or professionals in positions of trust, and it is therefore important that Lumos staff and associates remain vigilant.

- 6.3 **Physical abuse** is actual or potential physical harm perpetrated by another person, adult or child. The harm does not have to result in injury for it to constitute physical abuse. It may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical injury or potential injury to a child or adult at risk.
- 6.4 **Emotional abuse** is the persistent emotional maltreatment of a child/adult at risk that results in harm to their sense of self or wellbeing. Emotionally abusive acts include humiliation, bullying, and other non-physical forms of hostile or rejecting treatment. Some level of emotional abuse is involved in all types of abuse, though it may occur alone.
- 6.5 **Sexual abuse** is forcing, coercing or enticing a child or adult at risk to take part in sexual activities or engage in behaviours for a perpetrator's sexual gratification. This may include, but is not limited to, rape, oral sex, penetration, masturbation, kissing, rubbing or touching. It may also involve showing or producing sexual images or activities or encouraging sexually inappropriate behaviour. Sexual harassment is a type of sexual abuse and encompasses any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment and abuse may occur between anyone. This includes between children, between children and adults and between adults. Both males and females can be either the victim or the offender. Sexual harassment concerns between Lumos staff and associates are addressed through Lumos' Global Harassment and Bullying Policy.
- 6.6 **Neglect:** allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet physical and or psychological needs, which is likely to result in serious impairment to health, development and wellbeing.
- 6.7 **Exploitation** involves the use or attempted use of a power imbalance or relationship of trust to coerce, manipulate or deceive a person for sexual, monetary, political, social or personal gain and is a type of abuse. This can include sexual exploitation and commercial exploitation (forced labour/child labour) and trafficking. Victims of exploitation may not always recognise that they are experiencing abuse or harm and may appear to be "consenting." The appearance of consent or willingness to engage in the exploitative activity does not mean that the child/adult is not at risk or has not experienced harm and abuse.
- 6.8 **Sexual Exploitation** is a type of sexual abuse. It is defined as '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.'⁴ Like other forms of abuse, children and adults at risk can experience sexual exploitation. Sexual exploitation can be perpetrated by members of a local community, individuals online and in person or professionals in institutions, government authorities or other NGOs. Sexual exploitation also includes, , but is not limited to, a Lumos staff member or associate asking a person participating in a Lumos programme or activity to exchange sex for something they are entitled to for free e.g assistance or participation in an activity or programme. Lumos is committed to UN and other international standards on preventing sexual exploitation and abuse, including the IASC core principles on Protection from Sexual Exploitation and Abuse (PSEA)⁵.
- 6.9 **Child trafficking** under international law is "the recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploiting the child."⁶ A child has been trafficked if he or she has been moved within a country, or across borders, whether by force or not, with the purpose of exploiting the child. Children in institutions are at a considerably higher risk of trafficking than their peers raised in families. Orphanage trafficking is the deliberate recruitment of children in to orphanages in order to make profit. In some countries, the pervasive model of orphanage care is a form of trafficking in itself, where orphanages are established and children are recruited purely to make an income from donations.
- 6.10 **Child marriage** is any marriage where at least one of the parties is under 18 years of age. **Forced marriage** is a marriage in which one and/or both parties have not personally expressed their full and free consent to

⁴ <https://www.unhcr.org/uk/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>

⁵ <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-old>

⁶ UNICEF. (2007). Note on the definition of 'Child trafficking' http://www.unicef.org/southafrica/SAF_pressrelease_notetrafficking.pdf

the union. A child marriage is considered to be a form of forced marriage, given that one and/or both parties have not expressed full, free and informed consent. Child and forced marriage (CFM) is a human rights violation and a harmful practice that disproportionately affects women and girls globally, preventing them from living their lives free from all forms of violence. CFM threatens the lives and futures of girls and women around the world, robbing them of their agency to make decisions about their lives, disrupting their education, making them more vulnerable to violence, discrimination and abuse, and preventing their full participation in economic, political and social spheres. Child marriage is also often accompanied by early and frequent pregnancy and childbirth, resulting in higher than average maternal morbidity and mortality rates. CFM may lead to women and girls attempting to flee their communities or commit suicide to avoid or escape the marriage. CFM is a form of exploitation and can involve trafficking or movement of individuals for the purpose of exploitation.⁷

- 6.11 **Institutional abuse** can be defined as abuse or mistreatment by a regime as well as individuals within any building which exists to provide care. Neglect and poor professional practice need to be taken into account. This may be in the form of isolated incidents at one end of the spectrum to pervasive ill-treatment at the other. Abusive actions include unacceptably poor standards of care; lack of response to pressing needs; rigid routines; inadequate staffing and poorly trained staff. It should be noted that children in institutions are at a considerably higher risk of all forms of abuse compared with their peers raised in families. Lumos works to reform child care and protection systems, transitioning away from those based on providing institutional care. Where Lumos is working in an institution or working alongside partners to put a deinstitutionalisation plan into place then it is not appropriate for referral of those children to be made through the safeguarding procedures where there is no aggravating factor other than the general institutional harm which is already being addressed by Lumos. Where other forms of abuse are observed, for example physical or sexual abuse, or where there is immediate significant risk to a child, then these should be reported/referred in accordance with this policy. If staff are ever unsure of whether a practice or circumstances within an institution reach a threshold for reporting, they should always immediately seek advice from the Designated Safeguarding Lead and/or the Global Safeguarding Lead. If staff visit, begin work with or become aware of an institution where there is suspected abuse or significant harm, this should always be recorded and reported in line with this policy.
- 6.12 Many of the children and adults at risk Lumos works with, directly or indirectly, will have one or more risk factors that make them more likely to experience harm and abuse. For example, persons with a history of trauma or abuse, one or more disabilities, living away from home, and/or requiring intimate personal care are all at increased risk of abuse. Information on the signs and symptoms of forms of abuse are available as a resource in the Lumos Safeguarding Hub on Sharepoint, alongside further information about risk factors which may increase the risk of abuse or harm. It is important that all staff and associates familiarise themselves with this information and exercise professional curiosity and appropriate concern regarding the welfare of children and adults at risk in all of Lumos' work.
- 6.13 Online abuse is any type of abuse that happens on the internet or via phone, facilitated through technology like computers, tablets, mobile phones and other internet enabled devices. Online abuse can happen anywhere and can involve anyone. Children and adults at risk can be revictimised or experience further harm when abusive content is recorded, uploaded or shared by others online. This can happen whether the original abuse happened online or in person. Staff and associates should be mindful that children and adults at risk may experience several types of abuse and harm online including bullying/cyberbullying emotional abuse, pressure or coercion to create sexual images (sometimes referred to as "sexting"), sexual abuse and sexual exploitation. It is important to note that children and adults at risk can experience grooming online and that online platforms may be used to build trusting relationships in order to abuse individuals.⁸ Lumos must be mindful of all forms of harm and abuse related to online/digital activity and ensure that any activities done online undergo appropriate risk assessment. Online safety should be promoted via safeguarding awareness raising for digital or online events/activities.

7. PREVENTION

⁷ OCHA: <https://www.ohchr.org/en/women/child-and-forced-marriage-including-humanitarian-settings>

⁸ NSPCC: <https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse>

- 7.1 Lumos is committed to ensuring, through awareness and good practice, that all staff and associates prioritise the safety and wellbeing of children and adults at risk and use appropriate measures to minimise any risk our activities may pose. Lumos embraces the “do no harm” principle and uses the following practices and procedures to prevent harm across all our work.
- 7.2 **Safer Recruitment and Selection:** Preventing unsuitable people from gaining positions of trust with children and adults at risk is a cornerstone of Lumos’ approach. Accordingly, the charity adopts the principles of safer recruitment to minimise this possibility. Information about safer recruitment, including standards and procedures, can be found on Sharepoint. Procedures includes ensuring all staff have appropriate background checks for their roles/responsibilities, that gaps in employment are explained and competency-based interviewing is used, particularly for those posts which will have direct contact with children and/or adults at risk. All staff involved in recruitment of staff or associates shall following the standards set out in the Recruitment, Onboarding and Induction Guidance and the Safer Recruitment Checklist. HR focal points (in country) and outsourced HR in the UK, as well as the Global Safeguarding Lead, shall provide advice and guidance for these processes, as well as regular review.
- 7.3 **Learning, Induction and Training:** Ongoing learning and continuous improvement is an important part of Lumos’ safeguarding framework. Safeguarding information and resources can be accessed by all staff on the Lumos Safeguarding Hub. All staff will undergo mandatory safeguarding induction training. In the UK and for members of the Global Office, this will be provided by the GSL. For country offices, the DSL will provide induction, including to the local context and application of the policy (section 9). All staff are required to have safeguarding refresher training every year. Regular reviews will be undertaken by the Global Safeguarding Lead to identify whether additional safeguarding training is required for individuals and/or teams to support the safe implementation of this policy.
- 7.4 **Safer Programming and Risk Management:** Safer Programming is a crucial element of our child and adult at risk safeguarding approach and commitment to ‘do no harm.’ Safer Programming means considering the impact of our work (intended and unintended), as well as the safety and wellbeing of children and adults at risk from beginning to end for all areas of work. All work involving direct or indirect contact with children and/or adults at risk, whether delivered directly by Lumos or via partners, will undergo a safeguarding risk assessment.⁹ Identified risks will be managed throughout the project or programme cycle, from design to delivery, monitoring, evaluation and exit. This includes all events involving children and young people. Lumos will, as far as possible, provide a safe physical environment for children and adults at risk by applying health and safety measures in accordance with relevant law and regulatory guidance. Lumos will ensure that child/adult at risk friendly and accessible reporting, response and feedback mechanisms are in place for all of our work. At the organisational level, safeguarding risks and mitigations will be regularly reviewed as part of the Programmes and Safeguarding Committee and Audit and Risk Committee responsibilities.
- 7.5 **Use of Images and Stories:** Lumos will always ensure the safe and ethical use of children and adults at risk images and stories. The paramount consideration is to maintain respect for the safety, privacy and dignity of children/adults at risk, their families and communities. Documented informed consent is required before staff capture or use any images or stories relating to children or adults at risk and risks must be carefully assessed. See the Global Ethical Story and Content Gathering Policy for further information.
- 7.6 **Data Protection and Security:** Lumos is committed to protecting sensitive and/or identifying information and ensuring access to this information restricted in line with law and best practice. See Guidelines on Storing and Sharing Data About Children and the Lumos Data Protection Policy for further information.
- 7.7 **Partner Due Diligence:** Lumos is committed to undertaking appropriate due diligence to ensure that any partner organisations we work with for the purposes of projects and programmes are suitable and safe, regardless of whether this work is funded. Wherever Lumos engages with partners who undertake direct or indirect work with children or adults at risk, a safeguarding due diligence assessment shall be completed. This means undertaking a thorough review of the partner to ensure that there are appropriate safeguarding procedures in place and that, as a result of the assessment and the undertaking of partnership work, there are

⁹ Please contact the Global Safeguarding Lead for support on how to complete the safeguarding risk assessment. The template is a guide and can be adapted to suit projects and contexts as appropriate and with guidance from the appropriate DSL. This includes using an expanded or shortened version based on the project and scope of activities.

clear lines of safeguarding responsibility and reporting between all bodies involved. For example, that partners are aware of their responsibility to report all Safeguarding concerns to Lumos. Where a partner does not have sufficient policies and procedures, Lumos will support them to develop the appropriate guidelines and practices. Lumos also welcomes and expects partners to undertake their own due diligence on Lumos safeguarding and will comply with requests. See the Procurement Policy, Due Diligence Policy and the Safeguarding Due Diligence Framework and Guidance for further information.

- 7.8 **Code of Conduct:** Lumos takes an approach of zero tolerance towards all forms of bullying, harassment, sexual exploitation and abuse or any other form of maltreatment, whether towards children, adults at risk, colleagues or anyone else. All Lumos staff and associates are required to adhere to the behaviour standards set out in the Lumos Code of Conduct as well as the Guidelines for Working with Children and Adults at risk (Appendix D), which includes expected behaviour and good practice standards for all engagement with children and adults at risk, both inside and outside of work. The primary consideration should always be the welfare of the child/adult at risk and ensuring we create inclusive, respectful and safe environments for all interactions. Lumos staff should avoid all actions or behaviours which may constitute poor practice or potentially cause harm to children or adults at risk, whether or not this is intentional. Concerns regarding breaches of the Code of Conduct should be taken seriously and immediately reported in line with the guidelines described in this policy.
- 7.9 **Whistleblowing and Related Policies:** Lumos recognises that effective safeguarding of children and adults at risk is underpinned by a culture of accountability and care. Effective whistleblowing procedures are key part of safeguarding at Lumos. All concerns regarding misconduct, particularly those which pose a risk of harm to children and adults at risk, should be reported immediately. Staff and associates are encouraged to use the protected and confidential mechanisms outlined in the Whistleblowing Policy if they feel unable to report a concern via the normal reporting protocols.

8. REPORTING AND RESPONDING TO CONCERNS

- 8.1 Lumos staff and associates have a duty to report all Safeguarding concerns they witness, suspect or are told about. This includes:
- Concern that a child/adult at risk is experiencing or at risk of experiencing any form of harm or abuse. This can be by a family member or member of the public, another NGO staff member, government authority staff member, or Lumos staff member/associate
 - Concerns about the behaviour of other Lumos staff/associates
 - Concerns about the behaviour of staff/associates at other agencies or NGOs
- 8.2 Where an individual working with or for Lumos becomes aware of a situation where a child or adult at risk is suffering or is at risk of harm there is always a need for action. Lumos' responses to safeguarding concerns in relation to an adult at risk should be of the same high standard as those concerns about a child. If you are concerned for the welfare of a child or adult at risk, suspect abuse or harm, have been told by a child/adult at risk that he/she has been or may be harmed or if you are aware of an allegation of harm or risk, **you must always report. There is no minimum threshold for reporting a child or adult at risk safeguarding concern as described in this policy. If you think you are aware of a safeguarding concern, it is always better to report rather than keep concerns to yourself.** It is not the responsibility of staff to investigate or determine the veracity or significance of any allegation or concern, only to report in line with the guidelines set out in this policy. DSLs and the Global Safeguarding Lead are always available to discuss or explore concerns if staff are unsure.
- 8.3 Staff/Partner Safeguarding Concerns and Community Protection Safeguarding Concerns: Lumos recognises that staff or associates may be placed in situations where they are surrounded by children or adults at risk suffering or at risk of harm which may be viewed as the 'norm' in the country or context. All cases of harm or abuse involving or carried out by Lumos staff, associates or partners **MUST ALWAYS BE** immediately reported and are usually more easily identified as a reportable concern. However, community protection concerns (cases of harm or abuse NOT related to or carried out by Lumos staff, associates or partners) may be frequently encountered by staff/associates/partners in the field and it can be harder to understand thresholds of when to report and to whom. This complexity can be further compounded by Lumos' role in working alongside

government protection authorities or others who have direct responsibility for identifying and responding to child/adult protection concerns. To ensure that this is appropriately managed, all staff should report individual cases of harm or abuse (regardless of whether this is a staff/partner concern or a community protection concern) to their DSL. The DSL, alongside the Country Director and with guidance from the GSL, can determine how best to manage these cases, ensuring concerns are documented and shared with the appropriate authorities. The GSL will produce further guidance on distinguishing Staff/Partner Safeguarding Concerns and Community Protection Concerns in 2025 to ensure that both types of safeguarding concerns are being appropriately reported and actioned in all Lumos contexts.

- 8.4 **Responding to a Disclosure:** Often children/adults at risk will disclose their concerns about being abused not to senior staff but to those whom they know and trust. It is important, therefore, that all staff and associates know how to respond if a person discloses abuse or neglect to them or if their general behaviour leads staff to enquire if they are 'alright' and the individual then makes a disclosure. Staff and associates should always respond in a calm, caring and supportive manner. The victim or survivor is never to blame and the person should be reassured that they have done nothing wrong by sharing the concern or abuse. Staff should avoid asking leading questions and let the individual set the pace of the conversation. Never promise confidentiality, but do explain that you have a duty to pass on the information and will do so as sensitively as possible. Record what was said as soon as possible afterwards and report the matter to your DSL as soon as possible and always within 24 hours.
- 8.5 **Historical or Non-Recent Abuse Disclosures:** It is not unusual for individuals to disclose abuse several years after the fact, when they feel they are in a safe space to do so. The term historical abuse, or non-recent abuse as it is sometimes called, refers to any allegations of abuse, which occurred when the victim was a child, and which have been made when the victim is an adult or still a child, but often several years after the abuse took place. Lumos' responses to allegations of historical/non-recent abuse must be of the same high standard as a response to an allegation of current abuse because:
- a. There is a significant likelihood that a person who abused a child/ren in the past will have continued and may still be doing so;
 - b. It is likely that the person disclosing this information may need support - as a trauma informed organisation Lumos will aim to recognise the trauma the individual has experienced, seek to offer support and avoid re-traumatisation;
 - c. Criminal prosecution may be possible if sufficient evidence can be carefully collated.

PROCEDURE FOR REPORTING, RECORDING AND ESCALATION OF A SAFEGUARDING CONCERN

- 8.6 All child/adult protection and welfare concerns should be reported as soon as possible to a Lumos Designated Safeguarding Lead (DSL), a Director in the absence of a DSL, and/or the Global Safeguarding Lead and always within 24 hours (verbally or with confirmation of receipt in writing). If the concern is about or involves one of these people, please report directly to the Chief Executive. Safeguarding concerns can also be reported via the Whistleblowing Policy mechanisms. Staff should not feel inhibited about raising safeguarding issues and if it is not possible to contact the relevant person in the chain of responsibility, they should not hesitate to approach the next most senior person.
- 8.7 It is the role of the DSL to consider the information, provide initial advice and escalate to the Global Safeguarding Lead within 24 hours if the concern is deemed to meet the threshold as defined in the Guidance on Reporting and Escalation of Safeguarding Incidents and Cases. The appropriate Director should also be informed, with respect to confidentiality, and be updated on the progress of any investigation or actions by the DSL. Together, the DSL and the Global Safeguarding Lead will consider the information and advise on next steps, which may include:
- a. Instructing/supporting staff to gather further information. The DSL and Global Safeguarding Lead will provide instruction on completing the Safeguarding Report Form (Appendix E)
 - b. Helping conduct a risk assessment of the situation
 - c. Putting in place measures to mitigate risk or ensure a child/adult at risk is protected
 - d. Determining whether the issue/concern needs to be reported to local law enforcement and/or other statutory agencies. If it is judged that reporting it to local protection services will put the child/adult at greater risk, a risk assessment should be made and on the basis of this the Global Safeguarding

Lead will make a final decision about whether a referral should be made in consultation with the Chief Executive, if appropriate.

- 8.8 It is the reporting person's responsibility to:
- a. Record discussions, actions and report back as instructed.
 - b. Maintain appropriate confidentiality and adhere to guidelines on processing child data/sensitive information
 - c. Share any new information or further concerns in a timely way
 - d. Escalate to the Chief Executive or Named Trustee for Safeguarding if you remain concerned that a child/adult at risk is still at risk and/or the concern has not been addressed seriously by Lumos staff
- 8.9 The Global Safeguarding Lead will judge which cases are sufficiently serious to inform the Chief Executive or Nominated Trustee for Safeguarding. Further information regarding internal and external reporting, as well as escalation of high risk or complex cases can be found in the document Guidance on Reporting and Escalation of Safeguarding Incidents and Cases.
- 8.10 Lumos is committed to ensuring a child/person centred approach when responding to any cases or suspected cases of harm and abuse. This is in line with our commitment to be a trauma-informed organisation, ensuring that Lumos response to any disclosure or concern does not cause the individual child or adult at risk further harm or distress. In line with the child/adult at risks age and level of understanding, they should be kept informed of actions and provided with appropriate support, including external referrals to other agencies or NGOs for specialist support, where necessary.

RECORDING AND CASE MANAGEMENT

- 8.11 The Lumos Safeguarding Report Form gives guidance on how to record concerns (Appendix E) and should be completed by the staff or associate who became aware of the safeguarding concerns within 24 hours. This should be passed to the appropriate DSL for additional comment and then on to the Global Safeguarding Lead within a further 24 hours. The information should be shared securely using the Lumos Safeguarding Hub on Sharepoint, as per the guidelines outlined in the relevant policies¹⁰. It is the responsibility of the Global Safeguarding Lead to ensure all DSLs record safeguarding concerns and related actions in line with best practice, and to keep a central, summary record all incidents/concerns, actions taken and outcomes. A central record of all allegations will allow Lumos to see and respond to any patterns that emerge and will be used to inform the development of any safeguarding improvements and learning.
- 8.12 Cases will be closed following consultation between the Global Safeguarding Lead and the DSL, with input and advice from the Chief Executive, Safeguarding Working Group or Board being included as necessary for higher risk or complex cases. A case should be closed when a child or adult is no longer at risk of or suffering significant harm and any harm that has already occurred has been investigated and steps taken to stop the harm and stop it from happening again. This may occur when a case has been referred to the appropriate protection agencies who are investigating and taking action. It is important to note that, whilst Lumos are not involved in the formal investigation of cases undertaken by government protection agencies and/or police and we must respect the boundaries of these statutory investigations, we may offer resources, support, advice and monitoring and these cases should remain open until the staff member working on the case is satisfied that the intervention has successfully removed the risks to the child or young person and the appropriate support and care has been given. If a case has been closed in relation to the safeguarding concern this does not mean that Lumos will stop working with the case if ongoing contact is planned. In cases where particular instances of abuse have occurred in institutions in which Lumos is working, cases should be closed when the immediate risk to the child is removed due to the provision of additional support, for example, through a therapy team or specialist staff. It is not necessary to keep the case open until the institution is closed down.
- 8.13 Further details regarding recording standards and safeguarding case management can be found on Sharepoint in the Safeguarding Hub or advice sought from the Global Safeguarding Lead.

ALLEGATIONS AGAINST LUMOS STAFF AND ASSOCIATES

¹⁰ [Guidelines on Storing and Sharing Data About Children](#) and the [Data Protection Policy](#)

- 8.14 If a child or adult at risk is believed to be at risk from a Lumos member of staff or associate this should immediately be reported as per the guidelines in this policy, and the Chief Executive or the Named Trustee for Safeguarding informed. Reporting the behaviour of a colleague is usually uncomfortable and staff or associates may be concerned that they are over-reacting or wrong. But it is useful to consider the possible consequences if concerns are well-founded but there is a failure to act. The Whistleblowing policy is designed to protect staff or associates if a genuinely held concern turns out to be mistaken. All staff reporting and receiving concerns about other members of staff should consult the Global Safeguarding Lead or Chief Executive for advice and support through this process, as appropriate.
- 8.15 If an allegation of abuse is raised against a member of staff or associate, the alleged perpetrator must be immediately suspended without prejudice from any duties which involve direct or indirect contact with children or adults at risk until the alleged incident is investigated and concluded. Further information including Lumos responsibilities to the subject of any allegations and procedures for management of staff and associate incidents can be found in the Policy for Managing Allegations Against Staff and Associates.

SUPPORT FOR LUMOS STAFF AND ASSOCIATES

- 8.16 All staff who respond to a child protection concern, particularly those who respond to a direct disclosure of abuse from a child or adult will have the opportunity for debrief and discussion about their responses, and if they wish, the feelings and emotions it has engendered in them. This will be with the Global Safeguarding Lead or the DSL in their lead country. If appropriate and requested a referral could also be made to an external agency for counselling and support, in addition to offering the option of counselling to those who are regularly exposed to child protection cases. The Employee Assistance Program is also available to all staff.

9. APPLICATION OF THIS POLICY IN (INSERT COUNTRY NAME HERE)

- 9.1 This policy sets out the safeguarding approach and standards which Lumos wishes to see adopted in all its activities globally. However, practices and procedures will vary from country to country and the specific application of the Lumos policy including any variations from it shall be set out below. The approach should be to adopt the high standards which this policy implies wherever possible and to be clear about the reasons when it is necessary to depart from it. The country analysis below should be completed by the DSL and reviewed annually.¹¹ There should be an analysis completed for all countries in which Lumos operates regularly, not only where we have offices.
- 9.2 The legal, social and cultural context will vary greatly across countries and consequently, the specific legal reporting and reaction protocols will depend on the particular situation in which the concern arises. Therefore, it is essential that staff and associates familiarise themselves with the local procedures outlined in this section of the policy) before visiting a country. This should be translated in to English and be made available for staff and associates visiting country offices. The country risk assessment and safety procedures completed by Corporate Services prior to travel will outline additional relevant considerations.

Section 9: Safeguarding Country Context Form

Country Office	
Date Completed	
Country Designated Safeguarding Lead Name and Contact Details	
Country Director Name and Contact Details	
Other Authors/Contributors	

¹¹ DSLs to liaise with the Global Safeguarding Lead for guidance and timelines for completing section 9.

<p>Summary and description of legislation and any government guidance governing the welfare/safeguarding/protection of children and adults risk (including all young people, care leavers and other adults whom Lumos works with as part of our programmatic activities). Please list legislation involved in any aspect of prevention or response to abuse, harm, neglect or welfare concerns for these groups</p> <p>In addition to general concerns about harm, abuse and welfare, please consider any additional legislation or details that relates to disability, mental health, mental capacity, trafficking and exploitation, migrant status, gender identity, sexual orientation, health or age for example</p>	
<p>Analysis of extent of implementation/enforcement of legislation and any government guidance described above. Please provide information regarding barriers or problems relating to implementation and enforcement</p>	
<p>Details of any government agencies, local authorities, services or organisations with legal authority for the safeguarding or protection of children and adults at risk (including young people, care leavers and other adults whom Lumos works with as part of our programmatic activities). Please list all involved in any aspect of prevention or response to abuse, harm, neglect or welfare concerns for these groups. Consider government agencies, local authorities or legally designated organisations relating to disability, mental health, mental capacity, trafficking and exploitation, migrant status, gender identity, sexual orientation, health or age</p>	
<p>Please include details of any other health, welfare and other services that may be accessed as part of safeguarding response, including for victim support for both children and adults at risk.</p>	
<p>Details of legislation, services, authorities or organisations relating to institutions, residential care, small group homes, foster care, kinship care or other alternative care arrangements</p>	

<p>Details of legislation, services, authorities or organisations that are involved in supporting care leavers or young people with experience of being in alternative care, institutions or other settings.</p> <p>If there is a legally described age for a care leaver (for example in the UK it is from 18 to 25), please say and list what support they can access or are entitled to</p> <p>If there is no formal support or legal framework to support care leavers, please describe what services, if any, are available</p>	
<p>International conventions on welfare/safeguarding/protection of children and adults at risk, to which the country is a signatory or has ratified. (e.g. UN Convention on Rights of the Child.) Please include an analysis of the extent of implementation or links to such information, if available</p>	
<p>Local police/statutory service position on investigation of criminal assault, exploitation, trafficking abuse or harm against children and adults at risk and likelihood of prosecution of such offences</p>	
<p>Legal age of consent for children in country and legislation covering this. Any other information relating to legal consent for adults with disabilities or individuals with reduced capacity or decision making abilities</p>	
<p>Known harmful practices such as early marriage, female genital mutilation, intimate partner violence/domestic violence, gender based violence, trafficking and exploitation, etc. and details of any locations where this is known/believed to be particularly prevalent</p>	
<p>Attitudes, beliefs or behaviours seen in country that may cause harm to children and adults at risk</p>	
<p>Details of any informal or community-based justice and safeguarding mechanisms and how these function</p>	
<p>Details of NGOs and other organisations who provide protection or prevention services to children and adults at risk.</p>	

Include any local arrangements for dealing with safeguarding issues	
Details of any professional networks/alliances involved in safeguarding, rights and child or adult at risk protection	
Any other relevant information not covered in the areas above but which may be relevant for the safeguarding of children or adults at risk in the specific context	
<p>Details of how Community Protection Safeguarding Concerns shall be managed in line with the Global Safeguarding Policy should be briefly noted here or signposting provided to a secondary document. This should include:</p> <ul style="list-style-type: none"> • Local thresholds • Detailed reporting procedures and referral pathways (internal and external) • How this information shall be documented • How this information is shared with the Global Office and/or captured as part of programmatic activities 	

10. PROMOTING AWARENESS

- 10.1 Lumos actively promotes this policy and its safeguarding procedures to the many people involved with the organisation. The policy shall be made available to all staff, associates and partners in local languages wherever possible. The safeguarding policy has been converted to a child-friendly, accessible version in order to ensure children and adults at risk are aware of our responsibilities and how to report a concern. Those with key safeguarding roles and responsibilities, as outlined in Section 5, will make sure that they are known and accessible within their offices. Safeguarding information and resources are made available to all staff on Sharepoint and updates regarding practice and learning will be shared via internal newsletters.

11. ACCOUNTABILITY AND MONITORING

- 11.1 The Chief Executive will monitor the effectiveness and review the implementation of this policy, considering its ongoing suitability, adequacy and effectiveness. The GSL will make an annual report to the Board of Trustees and advise on any changes which need to be made. Regard will be paid to the views of the Named Trustee for Safeguarding and the Safeguarding Working Group.
- 11.2 Ongoing accountability and improvement in order to build a culture of safeguarding excellence is a key priority for Lumos. In order to help achieve this, audit and reporting structures will be overseen by the Global Safeguarding Lead. This will include annual country and programme audits to assess the effectiveness of safeguarding practice and procedures. All high-risk cases, particularly involving Lumos staff or associates, will be carefully reviewed to ensure appropriate learning is applied organisation wide. This includes incidents that are classified as “near misses.”

12. RELATED POLICIES, GUIDANCE AND RESOURCES

Guidance on the Reporting and Escalation of Safeguarding Incidents and Cases
 Additional Risk Factors and Signs and Indicators of Abuse
 Safer Recruitment Checks Procedure
 Safeguarding Risk Assessment Template
 Global Ethical Content and Storytelling Policy
 Procurement Policy
 Due Diligence Policy
 Safeguarding Due Diligence Framework and Guidance
 Code of Conduct
 Whistleblowing Policy
 Case Recording Guidance and Case Record Template
 Prevention of Sexual Abuse and Exploitation (PSEA) Policy

APPENDIX A: STATEMENT OF COMMITMENT TO SAFEGUARDING

Self-Disclosure

All information you provide will be treated as confidential, kept securely and managed in line with relevant data protection legislation and guidance. All information declared on this form will be carefully assessed to decide whether it is relevant to the Lumos role and will only be used for the purpose of safeguarding children, young people and adults at risk.

Have you, a close family member or member of your household ever been known to any children's services department or police or court as being a risk or potential risk to children or adults at risk?	YES NO
Have you ever been the subject of any investigation by any organisation, employer or body due to concerns about your behaviour towards children or adults at risk?	YES NO
Have you ever been the subject of disciplinary procedures or been asked to leave employment or voluntary activity due to inappropriate behaviour towards children/adults at risk or due to being a risk to children/adults at risk?	YES NO
Please provide further information for any questions where you answered yes.	

Confirmation of declaration (please tick box)	Tick box
Whilst working / volunteering for Lumos, I agree to inform Lumos within 24 hours if I, a close family member or member of my household is subsequently investigated by any agency or organisation in relation to concerns about behaviour towards children/adults at risk.	
I understand that the information contained on this form and any information supplied by third parties may be supplied by Lumos to other persons or organisations in circumstances where this is necessary to safeguard children/adults at risk.	
In accordance with the organisations procedures if required, I agree to Lumos clarifying any information provided on the disclosure with the agencies, authorities or organisations able to provide this information	

Commitment to Safeguarding

"I, _____ [name] _____, have read and understood the standards and guidelines outlined in Lumos' Safeguarding Policy. I agree with the principles contained therein and agree to implement and promote the procedures and practices contained within this document while working or associated with Lumos.

I understand that any actions undertaken solely by, or participated in by me, which materially contravene the principles of this policy either in the course of employment or in my private life, may be considered to be gross misconduct.

I confirm that I will immediately disclose any charges, convictions and other outcomes of an offence that relates to child/adult at risk exploitation and/or abuse, which occurred before or occurs during my association with Lumos. I also confirm that I will immediately report any concerns or allegations relating to child/adult at risk safeguarding in accordance with Lumos procedures as outlined in this policy.

I declare that the above information is accurate and complete to the best of my knowledge.

_____ (Print name)

_____ (Job title / role)

_____ (Signature)

_____ (Date)

Please return completed form to the HR department

APPENDIX B: KEY SAFEGUARDING CONTACTS

PLEASE CONTACT SAFEGUARDING@WEARELUMOS.ORG OR ANGELIQUE.ROBOLD@WEARELUMOS.ORG FOR ANY ENQUIRIES, INCLUDING CONTACT INFORMATION FOR COUNTRY OFFICE SAFEGUARDING FOCAL POINTS/DESIGNATED SAFEGUARDING LEADS FOR LUMOS COUNTRIES (MOLDOVA, UKRAINE, KENYA AND COLOMBIA)

APPENDIX C: GUIDELINES FOR WORKING WITH CHILDREN AND ADULTS AT RISK AND CONDUCT WITHIN COMMUNITIES

These guidelines aim to promote good practice by defining what is and is not acceptable behaviour when working with children, adults at risk, and any members of a community that Lumos is engaging with. All staff and associates shall familiarise themselves with this guidance, as well as adhere to the Lumos Code of Conduct at all times. This list is not exhaustive, but sets out the minimum standards for behaviour. In addition to the general principles of good practice in working with children and adults at risk, staff and associates should recognise that they, as adults, have a responsibility and, in some cases a legal duty, to ensure the safety of the children and adults at risk with whom they work.

Promoting The Rights of Children and Adults at Risk

Lumos believes that children and adults at risk have the right:

- To have their health, safety and wellbeing, and their best interests considered paramount
- To have their welfare and development promoted and safeguarded so they can achieve their full potential
- To be valued, respected and understood within the context of their own culture, religion and ethnicity
- To be listened to and to have their views given careful consideration, and to be encouraged and helped to participate in decisions which affect them

In order to make sure that these rights are respected, Lumos staff and associates should:

- Treat children and adults at risk equitably, with respect, dignity, sensitivity and fairness
- Regard them positively and value them as individuals who have specific needs and rights
- Work with them in a spirit of cooperation and partnership based on mutual respect and trust
- Value their views and take them seriously
- Work with them in ways that enhance their confidence, capacities and capabilities to develop their potential and empower them

Practice and Behaviour Standards

Lumos has a zero-tolerance approach towards all forms of bullying, harassment, sexual exploitation and abuse or any other form of maltreatment, whether towards children, adults at risk, colleagues or any one else. It is important for all staff and associates who are in contact with children and adults at risk to:

- Be aware of situations which may present risk and manage these risks appropriately
- Plan and organise events and work so as to minimise risks
- Be visible in working with children and adults at risk, as far as possible
- Ensure that a culture of openness exists to enable issues or concerns to be raised
- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
- Talk to children and adults at risk about their contact with staff or others and encourage them to raise any concerns
- Promote the use of positive ways of managing the behaviour of children that does not involve physical punishment or other forms of degrading or humiliating treatment
- Give enthusiastic and constructive feedback rather than negative criticism
- Provide advice and support to children and adults at risk on how to keep themselves safe
- Allow the child/adult at risk to initiate any physical contact, such as a hug
- Endeavour to be an excellent role model for all

Staff and Associates MUST NEVER:

- Hit, smack or otherwise physically assault or abuse children and adults at risk
- Engage in a physical/sexual relationship of any form with children or adults at risk
- Develop relationships with children and adults at risk which could in any way be deemed abusive, exploitative or for personal gain
- Act in ways that may place a child or adult at risk of harm or abuse
- Use language that is inappropriate, discriminatory, offensive or abusive
- Behave physically in a manner which is inappropriate or sexually provocative
- Condone or participate in behaviour of children which is illegal, unsafe or abusive
- Act in ways intended to shame, humiliate, belittle or degrade children or adults at risk, or otherwise perpetrate any form of emotional abuse
- Discriminate against, show differential treatment, or favour particular children or adults at risk to the exclusion of others
- Sleep in the same room or bed as a child or adult at risk with whom they are working
- Drink alcohol or be under the influence of illegal substances whilst responsible for children and/or adults at risk (including in the evenings when they may be called upon in an emergency)
- Discuss confidential information in front of children/adults at risk
- Be "friends" with children/adults at risk on personal social media or use a personal phone to contact them. Professional boundaries should be maintained at all times.
- Show or encourage children/adults at risk to search for or watch sexually explicit or violent content online.

APPENDIX D: GUIDE FOR REPORTING A SAFEGUARDING CONCERN

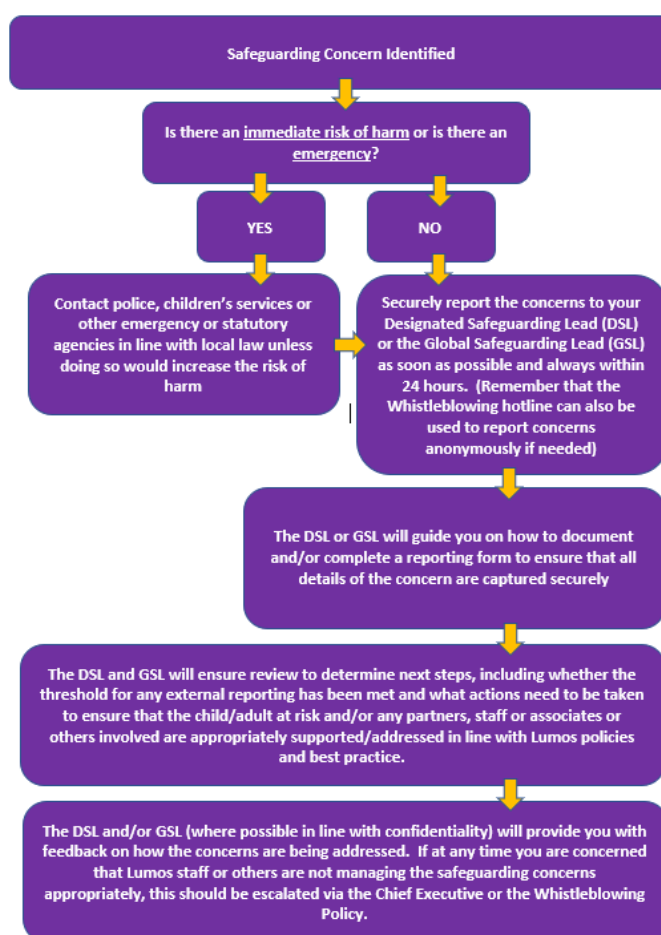
Lumos staff and associates have a duty to report all Safeguarding concerns they witness, suspect or are told about. This includes:

- Concern that a child is experiencing or at risk of experiencing any form of harm or abuse. This can be by a family member or member of the public, another NGO staff member, government authority staff member, or Lumos staff member/associate
- Concern that an adult at risk is experiencing or is at risk of experiencing any form of harm or abuse. This can be by a family member or member of the public, another NGO staff member, government authority staff member, or Lumos staff member/associate
- Concerns about the behaviour of other Lumos staff/associates
- Concerns about the behaviour of staff/associates at other agencies or NGOs

Do not keep concerns to yourself or attempt to investigate on your own. Report concerns as soon as possible to a Designated Safeguarding Lead or the Global Safeguarding Lead, and always within 24 hours.

If a child, adult at risk or other person discloses a safeguarding concern to you, remember the 6 Rs

1. **READY:** familiarise yourself with signs of abuse and exercise professional curiosity and care
2. **RECEIVE:** listen carefully, let the person set the pace, stay calm and be supportive.
3. **REASSURE:** tell them they have done the right thing by sharing the concerns. Do not judge or blame.
4. **RESPOND:** ask open questions to clarify concerns and risk, but do not lead. DO NOT promise confidentiality. Explain that you must report but reassure that it will be done sensitively and the person will be kept informed as much as possible.
5. **REPORT:** never keep concerns to yourself. Report as soon as possible to the DSL, Global Safeguarding Lead or Chief Exec.



APPENDIX E: SAFEGUARDING REPORT FORM

Part 1 of this form should be completed by the person who originally becomes aware of or receives a disclosure about a safeguarding concern. This should be provided to the Designated Safeguarding Lead/Global Safeguarding Lead for Completion of Part 2. The whole document should then be securely sent to the Global Safeguarding Lead in line with the guidance provided in the Guidelines on Storing and Sharing Data About Children and the Lumos Data Protection Policy. Please write as much or as little as you can and don't be concerned about leaving some sections blank if no information is available. Please distinguish carefully between what the victim/survivor/complainant actually said versus any comments or hearsay on the person's account. Use the victim/survivor/complainant's original words as best you can recall them, even if this means using words or expressions that you may find objectionable. In order to best understand the concerns, it is important that language is not sanitised or changed.

PART 1: TO BE COMPLETED BY PERSON WHO BECOMES AWARE OF THE CONCERNS
Your Name:

Your Position:
Your Knowledge of and relationship to the child/young person/adult at risk, if applicable:
Child/Young Person/Adult at Risk Name, if known or applicable:
Child/Young Person/Adult at Risk Current Address, if known or applicable (including institution if appropriate. If unknown, leave blank, to be obtained by the DSL).
Child/Young Person/Adult at Risk Date of Birth, if known or applicable:
Date, Time and Location of any incident observed or reported:
Describe the nature of the safeguarding concern/allegation. Please provide as much information as possible and be clear what is fact, opinion or hearsay. Please include relevant observations (e.g. description of visible bruising, other injuries, child's, young person's or adult at risk's emotional state etc). If you think there is an immediate or urgent risk, please clearly state so and why you are worried. If a disclosure or allegation was made, please record exactly what the child/young person/adult at risk said and what you said (Remember, do not lead the child or young person; record actual details. Continue on a separate sheet if necessary):
Actions taken so far following receipt of the concerns:
Have you reported this to the Designated Safeguarding Lead or Global Safeguarding Lead within 24 hours? Has this been verbally or in writing?
Print name: _____ Date: _____
PART 2: TO BE COMPLETED BY DSL
Additional Comments of Designated Safeguarding Lead or Global Safeguarding Lead:
Action recommended or already undertaken by the Designated Safeguarding Lead or Global Safeguarding Lead:

Has the threshold for referral to local child protection agencies, police or other relevant bodies been met? Please provide the reasoning for this decision.

Are there concerns that referring the case to other agencies is not in the child/adult at risk's best interests?

If the threshold has been met, but there are concerns that a referral is not in the child/adult at risk best interests, please immediately refer to the Global Safeguarding Lead if you have not already done so, and complete the risk assessment below.

Risk assessment if case is NOT to be referred to local child protection agencies:

What is the risk of referring the case to the child protection/other agency? Provide as much explanation or evidence as to how a referral is not in the child/adult at risk best interests based on the information at hand.

What is the risk if you don't refer the case to the child protection agency? What negative outcomes for the child/adult at risk or others could result from a failure to report?

How serious is the risk if you do refer the case to the child protection agency?

How serious is the risk if you don't refer the case to the child protection agency?

Summary of Risk Factors/Additional Vulnerabilities and Protective Factors

Risk Factors/Additional Vulnerabilities:

Protective Factors:

Any Other Comments:

Date and Time of referral and discussion with the Global Safeguarding Lead:

DSL Name:

Date:

Global Safeguarding Lead Comments and Actions

SMM Name:

Date

If escalated to the Chief Executive, Nominated Trustee for Safeguarding or Other, comments and actions to be recorded below:

Insert Link to Any Additional Case Notes/Records on Sharepoint Lumos Safeguarding Hub:

Date Case Closed:

Closure Summary and Explanation:

