



**EngenderHealth**  
for a better life

# **Child Safeguarding Policy**

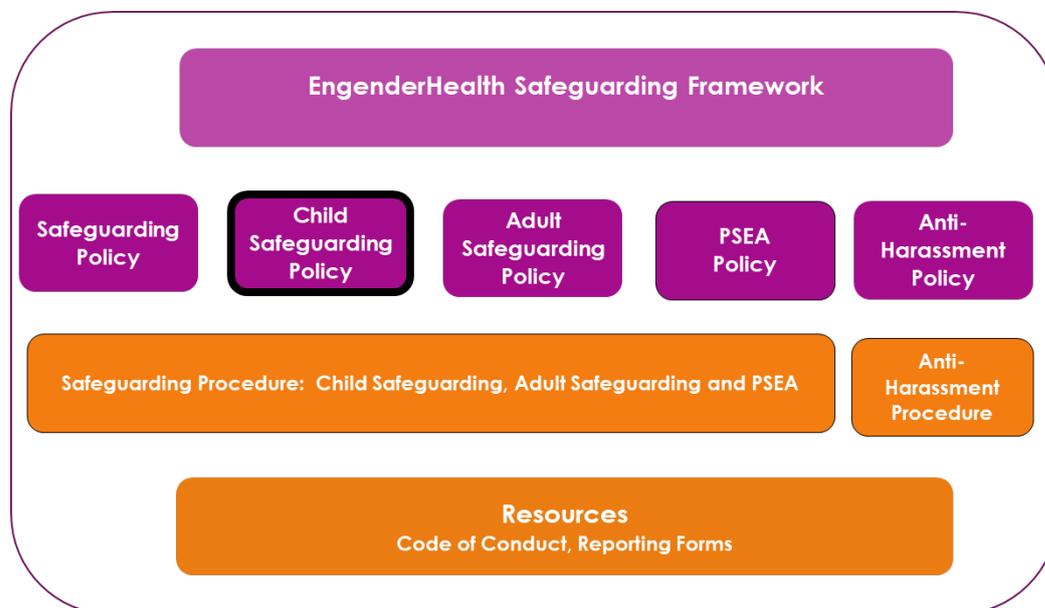
## **January 2019**

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## Safeguarding Framework

This document is part of EngenderHealth's Safeguarding Framework that consists of this policy, procedures and resources.



## Policy Introduction

### *EngenderHealth Principles, Commitments & Values*

Engender Health recognizes that all children have the right to protection from abuse and exploitation as outlined in the United Nations Convention of the Rights of the Child (UNCRC) safeguarding irrespective of ability, ethnicity, faith, gender, sexuality, and culture. The Safeguarding Policy outlines how EngenderHealth will ensure that all children and vulnerable adults that staff come into contact with or have an impact on, will be safeguarded and not put at risk of harm.

EngenderHealth adheres to the definition of safeguarding as outlined by the Keeping Children Safe Coalition:

“Child safeguarding is the responsibility that organizations have to make sure their staff, operations, and programs do not harm children, that is they do not expose children to the risk of harm and abuse, and that any concerns the organization has about children's safety within communities in which they work, are reported to the appropriate authorities.”<sup>1</sup>

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<sup>1</sup> Keeping Children Safe Coalition: [www.keepingchildrensafe.org.uk](http://www.keepingchildrensafe.org.uk)

## Accountability Statement

EngenderHealth takes this policy very seriously, and the mandate for safeguarding children comes from EngenderHealth's Executive Team (ET) and Board of Directors.

The Child Safeguarding Policy applies to all EngenderHealth staff members and associates who must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. Where required by law or local practices, EngenderHealth or Country Offices may enhance the standards as set out in this policy. This commitment will be evidenced through signing the policy and the Code of Conduct. Training in this policy is mandatory for all EngenderHealth staff, associates, and partners.

The Board of EngenderHealth is ultimately accountable for this policy. The CEO, ET and directors of EngenderHealth are responsible for its implementation. It is the responsibility of all representatives of EngenderHealth to raise any concerns regarding sexual exploitation and abuse. EngenderHealth takes all concerns and complaints seriously and will initiate a comprehensive investigation of complaints that are in violation of this policy and take disciplinary and possibly legal action as warranted.

## Policy Approach

This policy details how EngenderHealth achieves its child safeguarding obligations and applies to all staff, associates and partners regardless of their location.

## Safeguarding Principles and Practices

### *Safeguarding Principles*

This policy aims to ensure that EngenderHealth staff, associates and partners are:

- Skilled, confident, understand, and accept how to meet their child protection and safeguarding responsibilities.
- Well supported in operating within the Code of Conduct and safeguarding principles.
- Working positively with children and communities in ways that enhance the achievement of EngenderHealth's overall program goals and commitments.

**The policy is informed by the United Nations Convention of the Rights of the Child (UNCRC) and the following principles:**

1. A child is defined as anyone under the age of 18 years.
2. All children have equal rights to protection from abuse and exploitation.
3. Each child has a fundamental right to life, survival, and development.

4. All children should be encouraged to fulfil their potential, and inequality and discrimination should be challenged.
5. Children will be assured the right to express their views freely and this will be given 'due weight' in accordance with their age and level of maturity. EngenderHealth will not discriminate. The child will be treated with respect irrespective of gender, nationality or ethnic origin, religious or political beliefs, age, physical or mental health, sexual preference and gender identity, family, socio-economic and cultural background, or any history of conflict with the law.
6. Everybody has a responsibility to support the care and protection of children.
7. EngenderHealth has responsibilities to children who come into contact with us. No child must come to harm because of their engagement with EngenderHealth as participant in an EngenderHealth program or as part of any EngenderHealth fundraising or advocacy campaign.
8. These particular responsibilities extend to those individuals or organizations who are associated with EngenderHealth. Therefore, **everyone** working for or associated with EngenderHealth's work must be aware of and adhere to the provisions of this policy.
9. EngenderHealth will create a safe environment for children in all aspects of its work whether fundraising or program implementation, where all are respected, protected and empowered as their capacities evolve to contribute actively to the development of safeguarding measures within EngenderHealth.
10. EngenderHealth is committed to working in a transparent and open way, and all reports of concerns regarding safeguarding will be taken seriously. EngenderHealth ensures that the confidentiality of any child involved in a safeguarding concern is maintained.
11. EngenderHealth works within the framework of international law to ensure safeguarding. In cases where national law does not follow international safeguarding conventions, international law and best practice will be followed.

### *Do No Harm Approach*

As part of its safeguarding procedures, EngenderHealth is committed to adopting a Do No Harm approach in its programming and will ensure that:

1. The operating context including political dynamics, gender norms and social norms are understood.
2. The program adheres to international best practice on effective and ethical development practice.

Through the Do No Harm approach, programs will seek to avoid negative impacts and maximize positive impacts of their interventions.

### *Responsibilities*

The information below is fully outlined in the Code of Conduct; however, it is repeated in the Child Safeguarding Policy to ensure that all staff, volunteers, associates, and partners are aware of their responsibilities under this policy.

#### **EngenderHealth staff, associates, and partners agree to:**

1. Respect a child's right to privacy and maintain confidentiality when required.
2. Help children to take part in decision making and maintain a culture of communication.
3. Use non-violent and positive behavior at all times.
4. Inform children and their communities of their right to report any concerning situations.
5. Plan activities in a way to minimize the risk of harm.
6. Never abuse and/or exploit a child or act/ behave in any way that places a child at risk of harm.
7. Report any safeguarding concerns.
8. Respond to a child who may have been abused or exploited in accordance with this safeguarding policy.
9. Cooperate fully and confidentially in any investigation of concerns or allegations of safeguarding.
10. Contribute to building an environment where all are respected and encouraged to discuss their concerns and rights.
11. Always treat children in a manner that is respectful of their rights, integrity, and dignity, considers their best interests, and does not expose them to, or place them at risk of, harm. For example: when taking images/pictures during visits, interacting with children or generating stories of children, ensure that this is done in a manner consistent with the appropriate EngenderHealth's policies and procedures. This includes obtaining permission from the child and their parents/guardian for any photographs or video.
12. Never make any contact with a child or family members associated with EngenderHealth's work that is not supervised by another member of EngenderHealth Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails and letters.
13. Comply with the behaviors detailed in EngenderHealth's Global Code of Conduct.
14. Only arrange visits to meet with children in a protected space as chosen by the EngenderHealth's Country Office. This may include in their homes with the consent of the child's family and on the advice of the Country Office staff who always accompany the visit.

### **EngenderHealth staff, associates, and partners will never:**

1. Engage in any form of sexual relations with anyone under 18 years old, regardless of the legal age of sexual consent, the law and local customs. Mistaken belief in the age of the child is not a defense.
2. Exchange money, employment, goods or services for sexual favors, or subject the child to any other kind of humiliating, degrading or abusive behavior.
3. Touch children, or use language, or make suggestions in an inappropriate manner, to provoke, harass, or degrade the child/vulnerable adult.
4. Exploit or discriminate.
5. Be under the influence of drugs or alcohol while at work.
6. Work with or transport a child alone without the authorization of a manager unless absolutely necessary for the safety of the child.
7. Take part in any inappropriate physical, verbal or sexual behavior.
8. Maintain contact with children and their families via social networks.
9. Allow concerns, allegations, or suspicions of safeguarding to go unreported.

### *Definitions under the Safeguarding Policy*

It is imperative that all staff are aware of child abuse and safeguarding and understand the working definitions of abuse. Child abuse may be a deliberate act, or it may be failing to act to prevent harm. Child abuse consists of anything which individuals, institutions or processes do, or fail to do, intentionally or unintentionally, which harms a child, or damages their prospect of safe and healthy development into adulthood. It can include emotional, physical, and sexual abuse, as well as neglect.

The following definitions are also followed within this policy:

In line with the UNCRC, for the purposes of this policy, **a Child** is defined as any person under the age of 18 years (UNCRC Article 1).

**Child abuse** is defined as all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child, and includes any actions that result in actual or potential harm to a child.

Abuse can happen anywhere and at any time, but research shows that the perpetrators of abuse are likely to be known and trusted by the child. The most commonly defined types are:

**Physical:** Violence towards or deliberate injury of a child.

**Neglect:** Persistent failure to meet a child's basic physical and psychological needs.

**Sexual:** Using a child for sexual stimulation or gratification.

**Emotional:** Behavior which attacks a child's self-esteem.

**Child sexual exploitation:** Children in exploitative situations and relationships receive something such as gifts, money, or affection as a result of performing sexual activities, or others performing sexual activities on them.<sup>2</sup>

The UN Convention on the Rights of the Child (1989) requires states to protect children from abuse.

**Child protection and safeguarding** is defined in this policy as the responsibilities and preventative and responsive measures and activities that EngenderHealth undertakes to protect children ensuring that no child is subject to child abuse as a result of their association with EngenderHealth staff, their contact with EngenderHealth associates and partners, and/or their participation in any EngenderHealth activity, including our projects and programs.

'Child protection' is an element of Safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm.<sup>3</sup>

#### **Harm**

Psychological, physical and any other infringement of an individual's rights.

**EngenderHealth staff** refers to individuals who receive a regular salary for work in any part of EngenderHealth Inc., including all Country Offices, Field Offices, Headquarters, and any other location where EngenderHealth operates.

**EngenderHealth associates** refers to a range of paid and non-paid individuals who have committed to work with or support EngenderHealth. It includes volunteers, interns, and consultants and contractors.

**EngenderHealth managers** refers to EngenderHealth staff who have responsibility for line managing or supervising the work of EngenderHealth staff or EngenderHealth associates.

**EngenderHealth partners** refers to staff and/or representatives of partner organizations and local governments when operating in partnership agreement with EngenderHealth.

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<sup>2</sup> Oxfam Child Safeguarding Policy 2018

<sup>3</sup> <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

## Child Safeguarding Policy

In order to keep children safe, EngenderHealth will utilize the following policies.

Expected behaviors related to the Safeguarding Policy are fully outlined in the Code of Conduct.



### *Risk Assessment*

EngenderHealth will conduct child safeguarding risk assessments in all areas of work. As per the safeguarding standards, the key elements of risk assessments will be:

1. Establishing the context, scope and setting where the work is being conducted.
2. Identifying the potential impact on, or contact with children
3. Identifying and analyzing the potential risks of that impact or contact.
4. Evaluating the risks in terms of likelihood and the seriousness of impact.
5. Implementing strategies to minimize or prevent risk.
6. Reviewing and revising risks and preventative measures.
7. Communicating and consulting the risks and preventative measures.

## Minimizing and Addressing Risks

The types of risks that EngenderHealth faces may vary according to the context and child. For example, in some instances EngenderHealth may work with girls who are older than 18, but are vulnerable to gender-based violence (GBV) including but not limited to sexual abuse, intimate partner violence, transactional sex, forced marriage and others. In addition, EngenderHealth will provide SRHR services to adolescents under the age of 18. Any safeguarding related to these activities, will be monitored on a case by case basis.

Strategies to prevent or minimize risk will include:

1. Ensure that safeguarding is embedded within the organizational culture.
2. Clear roles and responsibilities in relationship to safeguarding are established at all programming levels.
3. Capacity building and training on safeguarding is delivered to all staff.

EngenderHealth is committed to ensuring that activities do not put vulnerable populations and children at risk and will put measures into place to mitigate this risk.



### Safe Recruitment

EngenderHealth has developed robust procedures to ensure that child safeguarding is at the heart of all recruitment for staff and associates. Recruitment and selection guidelines integrate safeguarding children considerations into all stages of the process. These stages are fully outlined in the Safeguarding Policy.



### Education/Training

In order for EngenderHealth to meet its commitments to child safeguarding, it is essential that everyone associated with the organization has clear education and training. All EngenderHealth staff, associates, and partners will:

1. Be provided with the Child Safeguarding Policy on induction. They will be required to sign that they have read and understood the policy as well as the Code of Conduct.
2. Have orientation on child protection and safeguarding when they begin work.
3. Be made aware of the Safeguarding Committee and how to reach them in the event of a question or concern.
4. Providing staff with refresher training annually.

In addition, the Child Safeguarding Committees in each location and management will have specialized safeguarding training relevant to their roles and responsibilities.



### *Safe Program Design*

Child Safeguarding will be considered at every stage of program development and implementation. Staff and associates who work directly with children must be supervised on a regular basis and safeguarding will be reviewed regularly throughout the program cycle. SRHR services will continue to be offered to adolescents and any safeguarding concerns will be monitored on a case by case basis.



### *Communications Guidelines*

EngenderHealth's safeguarding policy is a publicly available document. All staff, associates, partners, and communities will be made aware of this policy and how to raise a concern.

EngenderHealth will work with their Communications Department to ensure that all media and communication:

1. Is respectful of the Child Protection and Safeguarding Policy.
2. Keeps the safety and dignity of children as paramount.

Any photographs or communications material will only be obtained with the permission of the child and their parent/guardian, and any pictures or videos will be strictly for professional use.



### *Online Protection*

EngenderHealth will ensure that staff have education and awareness around the appropriate use of technology including the internet, mobile phones and social media in relationship to safeguarding. All staff, associates, and partners will adhere to EngenderHealth's IT policy.



### *Reporting & Responding to Concerns*

EngenderHealth recognizes that there are two possible ways that a safeguarding incident may arise:

1. Concerns related to potential, actual, or suspected abuse of a child or safeguarding by the family or community. Such incidents will be managed at the country level and the Safeguarding Committees will offer guidance. Any management will conform to international law.
2. Concerns that involve a staff member, associate or partner. These incidents must be reported to the Safeguarding Committee, appropriate management staff, and to headquarters. Any concerns will be investigated, and appropriate actions taken.

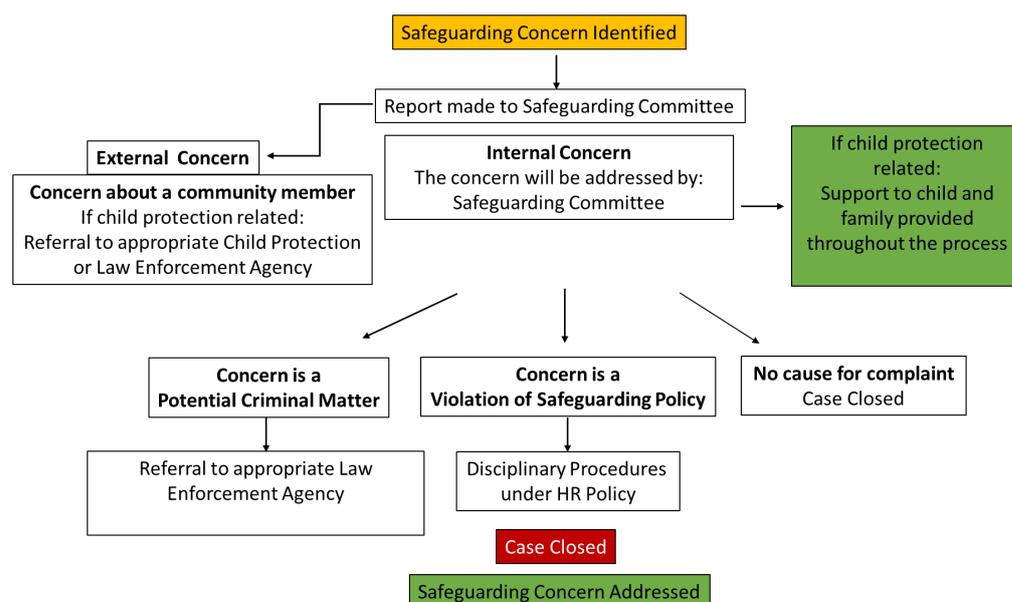
## Reporting Framework, Investigation and Follow-up

EngenderHealth takes the Safeguarding Policy very seriously, and to that end, EngenderHealth has **zero tolerance** for any violation of this policy. Concerns and reports may be received from a number of sources. Any concerns or reports will be sent to the Safeguarding Committee, and it is responsibility of all of us to do so.

The Safeguarding Procedures document outlines the steps in reporting, investigation and follow-up.

The Safeguarding Committee is responsible for receiving reports, investigations and follow-up related to violations of this policy. The Safeguarding Committee will identify how investigations should be managed systematically in line with the safeguarding policy, and will gather evidence and interview relevant parties to establish the probable facts. All concerns and reports will be taken seriously, investigated, and addressed immediately.

The following image outlines the Reporting Framework:



Local contacts with child protection agencies and law enforcement should be identified in advance by each EngenderHealth Country Office to enable the involvement of outside agencies when needed. Each Safeguarding Committee is responsible for uploading and regularly updating this information in the intranet. Any decision to refer a report or concern to an outside agency will be made within the legal framework of the country and in consideration of the best interests of the child involved, and in consultation with the Safeguarding Committee. EngenderHealth will also follow disciplinary procedures, which may result in disciplinary action, termination of employment and/or referral to the appropriate law enforcement agency or legal authority.

If a legitimate concern about suspected safeguarding is raised, which proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations of safeguarding.

Once the incident is closed, EngenderHealth will then make recommendations on improving the policies and practices that may have enabled the breach of safeguarding to occur, as well as on how to rebuild community trust, and on what help should be provided to minimise the harm to victims.

All incident reports will be maintained in a secure location in a manner consistent with applicable data protection guidelines.

### *Confidentiality*

Any EngenderHealth staff, associate, or partner who raise safeguarding concerns will be protected as far as possible from victimisation, or any other detrimental treatment, if they come forward with serious concerns, provided that they have followed the procedures, and provided that concerns are raised in good faith.

The subject of the complaint (alleged perpetrator) and all witnesses must cooperate fully and openly with internal and statutory investigations and hearings. Their confidentiality will be protected, and information which could identify them will be shared on a 'need to know' basis only. EngenderHealth will take strong action against anyone who knowingly broadcasts confidential information about the case.

### *Anonymous Reporting*

In addition to the Reporting Framework outlined above, EngenderHealth maintains a third-party secure reporting system through EthicsPoint to ensure that all staff, associates, partners, and vendors have recourse in the event of possible misconduct. Reports may be submitted anonymously for investigation via [www.ethicspoint.com](http://www.ethicspoint.com), or by calling the U.S. hotline at +1-866-739-4117, or the country number found at the same webpage. As referred to in EngenderHealth's whistle-blowing policy, all disclosures will be treated in confidence.

### *Safeguarding Committee*

A Safeguarding Committee has been established at the HQ level as well as in each field location. The Safeguarding Committee will be responsible for informing and training all staff in safeguarding, PSEA, and harassment policies and procedures. They will also be responsible for receiving and investigating any safeguarding complaints. Full details regarding the Committee are outlined in the Safeguarding Policy.



## *Safeguarding Management*

Safeguarding leadership is everybody's responsibility, but the Executive Team has a special responsibility to articulate and model safeguarding leadership of which we can all be proud. EngenderHealth therefore follows its "leadership credo" to convey the standards by which we should be held accountable and to which we will hold one another.

All leadership staff will be provided with safeguarding training and will be responsible for championing child protection within the organization. Managers will also ensure that all new staff members and associates receive a copy of the Child Protection and Safeguarding Policy and sign the Code of Conduct prior to beginning employment. They will also ensure with the support of the Country Offices that any partners adhere to the safeguarding policies.

Country Offices will put local procedures in place that are consistent with the global Safeguarding Policy. Any local procedures will be developed with the assistance of local advisors and the procedures will be accessible to staff in EngenderHealth's intranet, but also made available to associates, partners, and communities, including children and families EngenderHealth is working with, in local languages and child-friendly formats, where possible.

By adhering to these principles, we can ensure that safeguarding is held at the heart of all we do, and embedded at all levels of the organization.



## *Implementation & Review*

All staff have a responsibility to ensure that the safeguarding policy is implemented. Headquarters and each country program will conduct a safeguarding self-audit annually and will then develop a plan of action to address any gaps. The monitoring of adherence to this policy is made through the **mandatory** tracking of the Safeguarding Policy Implementation Standards and EngenderHealth's Code of Conduct by all parts of EngenderHealth.

EngenderHealth commits to completing a Self-Audit tool and revising the policy every two years to ensure compliance with international standards, and updated legislation as well as considering lessons learnt. Please see Annex 1 for the self-audit tool.

## **Annex 1: Child Protection Self-Audit Tool**

This self-audit tool has been developed as a way of measuring where EngenderHealth is in relation to meeting the standards on making children and vulnerable adults safe, and where to improve.

The checkpoint questions below are designed to draw out the minimum requirements that all agencies committed to protecting children and vulnerable adults should be striving to meet. However, depending on the nature of EngenderHealth's work with children and vulnerable adults and the context, environment and conditions we work in, some of the checkpoints may seem more relevant than others.

There are six statements/standards within each area. Read each statement and decide whether each statement is:

A: In place

B: Partially done

C: Not in place

Tick the A, B or C box as appropriate.

<b>CHILD AND VULNERABLE ADULT PROTECTION SELF AUDIT</b>				
<b>Children and Vulnerable Adults EngenderHealth</b>		<b>A</b>	<b>B</b>	<b>C</b>
1	EngenderHealth and its local partners are very clear about its responsibility to protect children and vulnerable adults and makes this known to all who come into contact with them.			
2	EngenderHealth staff's and local partners' behaviour towards children and vulnerable adults suggests that they are committed to protecting children and vulnerable adults from abuse.			
3	There is good awareness of the UN Convention of the Rights of the Child (UNCRC) or other children's rights instruments and this is seen as a basis for child protection in the organisation.			
4	Managers and senior staff ensure that children and vulnerable adults are listened to and consulted and that their rights are met.			
5	EngenderHealth and its local partners make it clear that all children and vulnerable adults have equal rights to protection.			
6	EngenderHealth and its local partners manage children's and vulnerable adults' behaviour in ways which are non-violent and do not degrade or humiliate children/vulnerable adults.			

<b>Policies and Procedures That Help Keep Children and Vulnerable Adults Safe</b>		<b>A</b>	<b>B</b>	<b>C</b>
1	EngenderHealth and its local partners have a written child and vulnerable adult protection policy or some clear arrangements to make sure that children are kept safe from harm.			
2	The policy or arrangements are approved and endorsed by the relevant management body (e.g., senior management board, executive, committee).			
3	The policy or arrangements must be followed by everyone.			
4	There are clear child and vulnerable adult protection procedures in place that provide step-by-step guidance on what action to take if there are concerns about a child's safety or welfare.			
5	There is a named child and vulnerable adult protection person/s with clearly defined role and responsibilities.			
6	The child and vulnerable adult protection procedures also take account of local circumstances.			

<b>Preventing Harm to Children and Vulnerable Adults</b>		<b>A</b>	<b>B</b>	<b>C</b>
1	There are policies and procedures or agreed ways of recruiting staff and for assessing their suitability to work with children and vulnerable adults, including where possible police and reference checks.			
2	There are written guidelines for behaviour or some way of describing to EngenderHealth staff and local partners what behaviour is acceptable and unacceptable especially when it comes to contact with children and vulnerable adults.			
3	The consequences of breaking the guidelines on behaviour are clear and linked to organisational disciplinary procedures.			
4	Guidance exists on appropriate use of information technology such as the internet, websites, digital cameras, etc., to ensure that children and vulnerable adults are not put at risk.			
5	Where there is direct responsibility for running/providing activities, including residential care, children and vulnerable adults are adequately supervised and protected at all times.			
6	There are well-publicised ways in which staff can raise concerns, confidentially if necessary, about unacceptable behaviour by other staff or representatives.			

<b>Implementation and Training</b>		<b>A</b>	<b>B</b>	<b>C</b>
1	There is clear guidance to staff, local partners and other organisations (including funding organisations) on how children and vulnerable adults will be kept safe.			
2	Child and vulnerable adult protection must be applied in ways that are culturally sensitive but without condoning acts that are harmful to children/vulnerable adults.			
3	There is a written plan showing what steps will be taken to keep children and vulnerable adults safe.			
4	All members of staff and associates in EngenderHealth, and its local partners have training on child and vulnerable adult protection, which includes an introduction to the organisations' child and vulnerable adult protection policy and procedures where these exist.			
5	All members of staff, associates, and local partners are provided with opportunities to learn about how to recognise and respond to concerns about child and vulnerable adult abuse.			
6	Work has been undertaken with all local partners to agree good practice expectations based on these standards.			

<b>Information and Communication</b>		<b>A</b>	<b>B</b>	<b>C</b>
1	Children and vulnerable adults are made aware of their right to be safe from abuse.			
2	Everyone in EngenderHealth and the local partners know which named staff member has special responsibilities for keeping children and vulnerable adults safe and how to contact them.			
3	Contact details are readily available for local child and vulnerable adult protection resources, safe places, national authorities and emergency medical help.			
4	Children and vulnerable adults are provided with information on where to go to for help and advice in relation to abuse, harassment and bullying.			
5	Contacts are established at a national and/or local level with the relevant child protection/welfare agencies as appropriate.			
6	Staff members with special responsibilities for keeping children and vulnerable adults safe have access to specialist advice, support and information.			

<b>Monitoring and Review</b>		<b>A</b>	<b>B</b>	<b>C</b>
1	Arrangements are in place to monitor compliance with child and vulnerable adult protection measures put in place by the organisation.			
2	Steps are taken to regularly ask children/vulnerable adults and parents/carers their views on policies and practices aimed at keeping children/vulnerable adults safe the effectiveness of these.			
3	The organisation uses the experience of operating child and vulnerable adult protection to influence policy and practice development.			
4	All incidents, allegations of abuse and complaints are recorded and monitored.			
5	Policies and practices are reviewed at regular intervals, ideally at least every three years.			
6	Children/vulnerable adults and parents/carers are consulted as part of these reviews of safeguarding policies and practices.			

Audit tool adapted from Keeping the Children Safe: <http://keepingchildrensafe.org.uk/toolkit2>