

CarbonCare InnoLab Safeguarding Policy

(Revised and Implemented in August 2020)

1. Purpose

The purpose of this policy is to protect people, particularly children¹, at risk adults² and beneficiaries of our programmes from any harm that may be caused due to their coming into contact with CarbonCare InnoLab Limited (CCIL). This includes harm arising from:

- The conduct of staff or personnel associated with CCIL
- The design and implementation of CCIL's programmes and activities

The policy lays out the commitments made by CCIL, and informs staff and associated personnel³ of their responsibilities in relation to safeguarding. This policy does not cover safeguarding concerns in the wider community not perpetrated by CCIL or associated personnel.

2. What is safeguarding?

Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. In the civil society sector, CCIL understands it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff, associated personnel or programmes. Further definitions relating to safeguarding are provided in the glossary below.

3. Scope

This policy applies to the staff and associated personnel who have in contact with children or vulnerable adults from their job duty includes regular and possibly unsupervised contact with children or at risk adults, including;

- All board members and staff contracted by CCIL (CCIL Staff)
- Associated personnel whilst engaged with work related to CCIL, including but not limited to the following: consultants, interns, volunteers, partners and contractors (Associated Personnel)

¹ See 'Glossary of Terms for definition of children

² See 'Glossary of Terms for definition 'at risk adults'

³ See 'Scope' for definition of associated personnel

4. Policy Statement

CCIL believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. CCIL has zero tolerance to any abuse, neglect and exploitation by staff or associated personnel.

This policy will address child and youth safeguarding and adult safeguarding.

CCIL commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

5. Prevention

CCIL responsibilities

CCIL commits to:

- Ensure all CCIL Staff have access to and are familiar with their responsibilities within this policy;
- Design and undertakes all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with CCIL. This includes the way in which information about individuals in our programmes is gathered and communicated;
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel;
- Require a Sexual Conviction Record Check (SCRC) from CCIL Staff whose job duty includes regular and possibly unsupervised contact with children or at risk adults;
- Require CCIL Staff and Associated Personnel who may come into contact with children and vulnerable adults through our activities to sign a statement of commitment of CCIL's Safeguarding Policy;
- Ensure CCIL Staff receive training on safeguarding at a level commensurate with their role in the organization; and
- Follow up on reports of safeguarding concerns promptly and according to due process.

CCIL Staff and Associated Personnel responsibilities

Child safeguarding

CCIL Staff and Associated Personnel must not:

- Engage in sexual activity with anyone under the age of 18 related to any CCIL programme or activity.
- Sexually abuse or exploit children including the use or transfer of child pornography.

- Curse/ swear around children, use insults, unkindly tease them, or speak and behave in ways that may frighten or shame them.
- Use physical punishment, humiliation, fear or threat in discipline and behavior management.
- Subject a child to physical, emotional or psychological abuse, or neglect.

Adult safeguarding

CCIL Staff and Associated Personnel must not:

- Sexually abuse or exploit at risk adults.
- Curse/swear around risk adults, use insults, unkindly tease them, or speak and behave in ways that may frighten or shame them.
- Use physical punishment, humiliation, fear or threat in discipline and behavior management.
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect.

Additionally, CCIL Staff and Associated Personnel are obliged to:

- Understand and comply with CCIL Safeguarding Policy Framework.
- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Be alert to risk of danger or harm to children or vulnerable adults.
- Learn to recognise and respond to the signs of child abuse.
- Treat children and vulnerable adults equally.
- Report any concerns or suspicions regarding safeguarding violations by an CCIL Staff or Associated Personnel to the designated safeguarding officer (See “How to report a safeguarding concern” below).

6. Enabling reports and how to report safeguarding concern

CCIL provides safe, appropriate, accessible means of reporting safeguarding concerns to staff and the communities we work with.

CCIL’s Personnel Policies contain whistle-blower clause to protect any staff reporting concerns or complaints through formal whistle-blowing channels or upon their request. Confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information and report relating to the concern will be treated with strict confidentiality and the identity of the whistle-blower will not be disclosed without his/ her consent before or after investigation, except on a “need-to-know basis” within the Organisation’s management structure. All documents and communications will be printed for record at locked cabinet. The record will be kept for 7 years.

CCIL Staff

CCIL Staff should alert and report to the Designated Safeguarding Officer (DSO) of any suspected or actual safeguarding concerns. The DSO will judge the seriousness of such allegations or suspicions. CCIL Staff should report to Board Chairman directly if DSO is implicated in the concern. If staff have any genuine concerns about safeguarding, CCIL encourages and supports them to communicate these without fear of reprisals and in the knowledge that they will be protected from victimization or dismissal.

Associated Personnel and External Sources

CCIL accepts complaints from Associated Personnel and external sources such as members of the public, partners and official bodies. Associated Personnel and external sources can report to their main contact point at CCIL by written letter, email or phone. The coordinated CCIL’s staff will report to DSO directly. If the main contact point at CCIL is implicated in the concern, they can report to the supervisor of the subordinate. The supervisor will report to DSO. If DSO is implicated in the concern, the staff of CCIL will report to Board Chairman directly.

Details are listed in Disclosure of Workplace Malpractice and Whistle-blowing Clause under CCIL’s Personnel Policies.

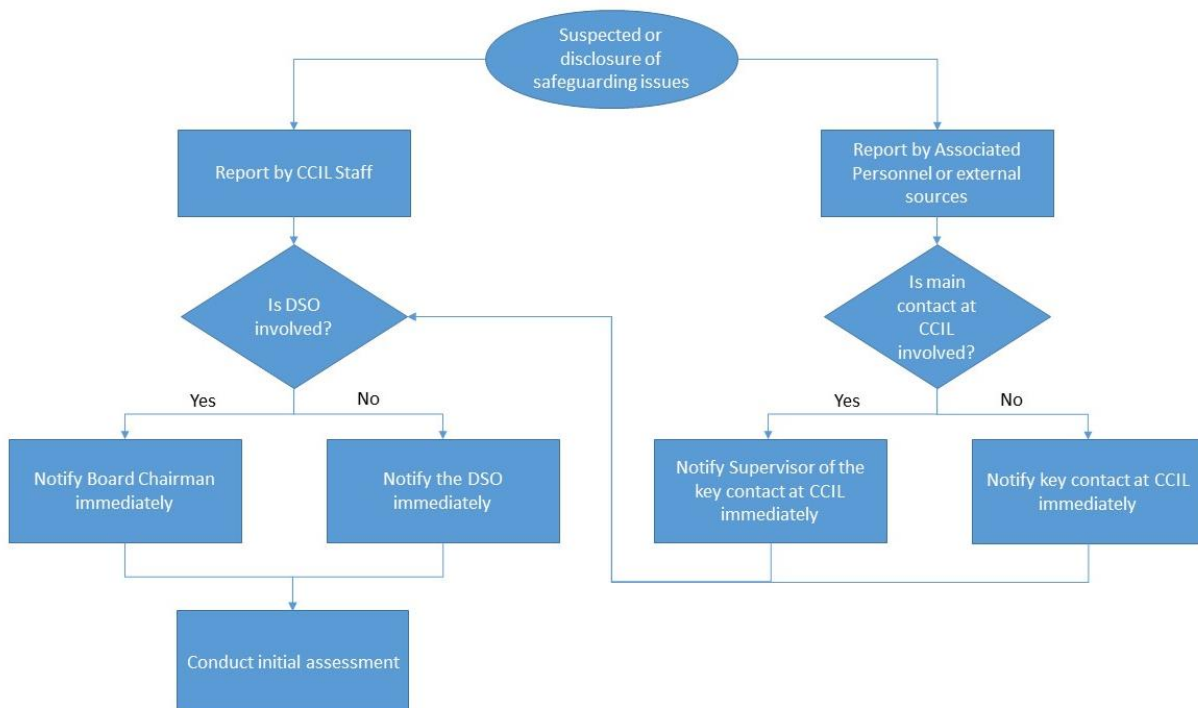


Figure 1 Flow Chart of Safeguarding Reporting

7. Response

CCIL implements Four-Rs approach to respond safeguarding concerns, which are Response, Record, Report, Referral.

RESPONSE: Prompt response is required if CCIL Staff and Associated Personnel recognise the signs of abuse to children and vulnerable adults.

RECORD: CCIL Staff and Associated Personnel is required to record the observations in an incident report for follow-ups, such as what did it happen; When did it happen; What was going on; Who was around. The report summary will be provided to corresponding parties, including victims.

REPORT: CCIL Staff and Associated Personnel should report Safeguarding concerns to DSO. DSO, or Board Chairman (if DSO is implicated in the concern) will respond within 48 hours after receiving the safeguarding referral. The enquiry or complaint requests will be documented.

REFER: DSO will decide if immediate risk of harm to the children or vulnerable adults. Refer to NGO partner, Social Welfare Department or Police without delay if needed.

CCIL reserves the right to dismiss and suspend the staff and/or associated personnel who found in breach of policy.

CCIL offers support to survivors of harm caused by CCIL Staff or Associated Personnel. Decisions regarding support will be led by the survivor.

Notifications will be shared with different stakeholders, including CCIL's boards and funders. Immediate actions will be conducted to protect the victims as well we prevent further escalation of the incident.

8. Risk assessment

Potential risks of harm to child and vulnerable adults whilst accessing activities in CCIL are identified below:

Key Risk	Likelihood of harm happening	Risk Minimization
Recruitment of inappropriate staff	Low	Sexual Conviction Record Check (SCRC) requirement at recruitment <u>Safeguarding interview questions</u> Safeguarding commitment statement <u>at job appointment</u>

Unqualified or untrained staff in role	Low	Safeguarding commitment statement and training
Unqualified or untrained associated personnel such as consultants, interns, volunteers, partners and contractors	Low	Sexual Conviction Record Check (SCRC) requirement at recruitment
Lack of awareness of “Risk of harm” with members and visitors	Low	Safeguarding commitment statement and annual training
Unauthorised photography and videography	Medium	Photo disclaimer and consent

9. Monitoring and Evaluation

CCIL will review the Safeguarding policy and procedures in January every year according to framework below:

Elements	What do we need to know to assess effectiveness?	Indicator	Who should take the responsibility for measuring this?	How should we monitor/collect the relevant information?	What happens to the information once it is collected?
Recruitment	Have background check with previous employer and police reference checks been conducted satisfactorily before post has been offered? CCIL will seek personal consent, it is	Consent from CCIL Staff. Police reference check filed in personnel file, time taken documented	Admin officer	Review of personnel files	DSO
Reporting and reaction processes	Are reporting and reaction processes standardized, clearly outlined and made available to all representatives	These processes are clearly documented and understood by all children, vulnerable adults, employees, advisors,	Community team	Regular questions to different groups of employees	DSO

	to include reporting and storing information	volunteer, interns, etc.			
Overall implementation	Do children and vulnerable adults feel safe in the activities organized by the organisation?	In a randomly distributed questionnaire, children indicate feeling safe in 5/5 specified areas	Community team	Questionnaire	DSO

10. Designated Responsible Safeguarding Officer

The DSO is Chong Chan Yau, Co-founder and CEO of CCIL. In his absence, Alissa Tung, Programme Director of CCIL will be the DSO.

DSO responsibilities

- Overseeing the referral of any cases of suspected abuse or allegations of the same;
- Providing advice and support to staff on safeguarding issues;
- Maintain records on safeguarding referrals, complaints or concerns raised;
- Keeping central confidential files;
- Providing an out of hours contact point in exceptional circumstances;
- Ensuring appropriated safeguarding procedures and all relevant updates are put in place for staff;
- Ensuring safeguarding policy and procedures are kept up-to-date;
- Implementing and reviewing policy and procedures to ensure that these remain effective and legally compliant
- Contributing to case reviews and implementing any resulting action plans.

11. Associated policies

- Personnel Policies Clauses 82 to 85 - Sexual Harassment Clause
- Personnel Policies Clauses 91 to 98 - Disclosure of Workplace Malpractice and Whistle-blowing Clause

12. Glossary of Terms

At risk adult

At risk adults are adults with a learning disability, mental health difficulties, an illness, age, physical disability, in need of care, or who are in other ways not able to protect themselves against abuse, significant harm or exploitation. Sometimes also referred to as vulnerable adult.

Beneficiary of Assistance

Someone who directly receives goods or services from CCIL's programmes and activities. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18.

Harm

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

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Sexual abuse

The term 'sexual abuse' means the involvement of a child in sexual activity (e.g. rape, assault) which is unlawful, or to which a child is unable to give exploitation and abuse of a child. (e.g. production of pornographic material).

Sexual Conviction Record Check (SCRC)

The Sexual Conviction Record Check (SCRC) is an administrative scheme operated by the Hong Kong Police Force to enable employers of persons undertaking child-related work and work relating to mentally incapacitated persons (MIPs) to check whether eligible applicants have any criminal conviction records against a specified list of sexual offences.

Sexual exploitation

Utilization of one's position with the possession of differential power that renders a child vulnerable. It includes sexual acts which may be rewarded or apparently attractive to the child.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.