

# UWS GLOBAL CHILD PROTECTION AND SAFEGUARDING POLICY

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## 1. Introduction

United World Schools (UWS) is a non-profit organisation on a mission to achieve Zero Education Poverty, striving to ensure that every child achieves basic proficiency in reading, writing, and numeracy skills by the age of 14. Operating collaboratively with governments, civil society, and stakeholders, UWS employs a holistic 5-pillar approach around Access, Quality, Inclusion, Sustainable Communities, and Strengthened Systems. Our commitment is deeply rooted in prioritising children and vulnerable adult's rights, well-being, and safety across all aspects of our operations and activities, extending to all UWS schools across Cambodia, Myanmar, Nepal, and Madagascar.

Recognising the inseparable link between protection and safety and our core mission, UWS places effective child protection and safeguarding (CPS) at the forefront of our values. This Global CPS Policy serves as a beacon, outlining a universal framework of CPS principles, guidelines, and practices for all UWS Stakeholders. This policy is underpinned by the provisions enshrined in the United Nations Convention on the Rights of the Child<sup>1</sup> (UNCRC), the UN Convention on the Rights of People with Disabilities (UNCRPD), and other relevant international and national laws related to CPS.

Complemented by implementation procedures and tools, the policy aims to ensure the safety and protection of children and vulnerable adults across our global programmes, establishes a consistent and comprehensive approach to CPS globally, declares the unacceptability of any harmful behaviour and compels UWS Stakeholders to align with our commitment, fosters secure school environments, and to safeguard UWS Stakeholders and the reputation of UWS. In doing so, the policy designates all UWS Stakeholders as duty bearers in protecting children and vulnerable adults, embodying our unwavering dedication to their safety, protection and well-being across all UWS countries and contexts.

## 2. Scope and Application

This policy applies to all children and vulnerable adults who are involved with, come into contact with, or are impacted by UWS' work, programmes, and activities. This extends to both direct involvement and activities conducted by third parties on behalf of UWS.

All UWS Stakeholders, regardless of their direct involvement with children or vulnerable adults, such as UWS Trustees, Staff, Associates, School Staff/Teachers, School Management Committees, Volunteers, Visitors, Suppliers, Contractors, and related parties, are subject to the provisions outlined in this policy.

It is mandatory for UWS Staff to read this Global CPS Policy and the Inclusive Education Policy (Section 12), sign a commitment statement endorsing its principles and procedures (Appendix A), and adhere to them at all times. Violations may result in disciplinary actions. Country Human Resource (HR) Departments are tasked with ensuring that all Staff sign the commitment statement upon commencement of employment with UWS and then annually thereafter.

The policy extends protective measures to all children and vulnerable adults in contact with UWS programmes and Stakeholders, including expectations for Stakeholder behaviour within and outside official capacities. UWS Global and National Management Teams can take action for

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<sup>1</sup> [UNCRC Summary.pdf \(unicef.org.uk\)](https://www.unicef.org.uk/uncrc-summary)

misconduct beyond organisational operations, superseding other UWS policies and those of partner organisations in cases of conflict.

Programme and Fundraising Managers are responsible for disseminating the external version of this policy to partners, contractors, associates, and grantees. They must obtain a signed commitment to the policy's principles and procedures and conduct CPS risk assessments and due diligence for any work involving children and vulnerable adults, whether directly or indirectly.

This policy outlines the overarching CPS framework, principles, and standards applicable to all UWS activities worldwide. While recognising contextual differences, UWS emphasises the need for national leadership and contextualisation to ensure the policy's effective, appropriate, and proportionate application in diverse and evolving settings. UWS acknowledges that, owing to variations in legal statutes and contextual factors, certain practices and procedures may necessitate adaptation from one country to another, detailed within Section 10.

### 3. Guiding Principles and Commitments

**Promote, Prevent, Protect:** UWS is dedicated to promoting, protecting, and preventing harm to the well-being of children and vulnerable adults. Through prioritising the incorporation of their needs into all aspects of our work, we actively manage risks to prevent abuse and harm, championing their welfare and ensuring a proactive approach that underscores our commitment to their safety and flourishing.

**Child-Centred and Trauma-Informed Approach:** UWS acknowledges its profound responsibility when engaging with individuals in vulnerable situations, prioritising the welfare and best interests of children and vulnerable adults in all circumstances.

**Inclusive Participation:** Valuing the perspectives of children, vulnerable adults, and communities, UWS consistently seeks consultation and feedback to promote safe and inclusive school environments.

**Vigilance and Awareness:** UWS is committed to swift responses to safeguard all individuals at risk, recognising the role of parents or guardians in advocating for their children's rights.

**Collective Responsibility for CPS:** CPS is a shared responsibility across the organisation, with high standards, training, and supervision to ensure staff possess necessary safeguarding skills. Breaches prompt immediate investigation and possible disciplinary action.

**CPS as a Golden Thread:** UWS embeds comprehensive CPS practices across organisational functions, holding high standards through effective due diligence and continuous monitoring, reporting, and review by Stakeholders globally.

**Cultivating a Culture of CPS Excellence:** At every level, UWS is committed to fostering an internal culture characterised by accountability, openness, transparency, and continuous learning to ensure the safety and well-being of all involved.

### 4. Key Definitions

**Child:** In line with the UNCRC, a child is defined as any person under the age of 18. This definition applies to all of UWS' work, regardless of whether the legal age varies in any country or legal context.

**Vulnerable Adult:** A vulnerable adult is defined as any person aged 18 or over who is at risk of abuse or neglect due to their specific needs for care and support (NHS England). Vulnerable adults may include those 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, sex, gender identity, sexual orientation, disability, mental health, caste, religion, health, and age (based on World Health Organisation definition of vulnerable groups).

**Child protection and safeguarding:** In this policy, the term Child Protection and Safeguarding (CPS) serves as an umbrella term encompassing measures to ensure the well-being, safety, and rights of children and vulnerable adults. The following definitions clarify the nuances within this overarching concept:

- **Safeguarding:** Safeguarding refers broadly to an organisation's responsibility to ensure the safety of all individuals, encompassing children, vulnerable adults, and its own staff.
- **Child Safeguarding:** Child Safeguarding specifically pertains to an organisation's responsibility to proactively prevent harm or abuse to children through the implementation of effective policies, strategies, and practices.
- **Child Protection:** Child Protection is a crucial aspect of the child safeguarding process, focusing on the prevention and response to violence, exploitation, and abuse of children in all contexts. It involves actions taken by the organisation to address concerns about a specific child being at risk of significant harm in various settings, such as contact with staff, partners, programs, services, activities, or unrelated risks around the school.
- **Vulnerable Adult Safeguarding:** Vulnerable Adult Safeguarding comprises policies, procedures, and actions implemented to protect adults at risk of abuse, neglect, or harm due to factors such as age, disability, illness, or other vulnerabilities. The primary goal is to ensure the well-being, dignity, and rights of individuals who may be unable to adequately protect themselves in certain situations.

**Abuse:** refers to any intentional act or failure to act that results in, or has the potential to result in, significant physical, emotional, or sexual harm to a child or vulnerable adult. This includes but is not limited to physical violence, emotional maltreatment, sexual exploitation, neglect, or any other form of maltreatment. Abuse encompasses actions that violate the rights of the child as outlined in the UNCRC.

**Harm:** involves any detrimental effect on a child/vulnerable adult's physical, emotional, psychological, or social well-being. Harm can result from various factors, including abuse, neglect, exploitation, violence, or exposure to inappropriate content. It encompasses the negative consequences that hinder the healthy development and overall welfare of an individual.

Additional abuse and harm definitions and indicators are detailed in Section 6.

The term **UWS Stakeholders** is used as an umbrella term to include UWS Trustees, UWS Staff, UWS Associates, UWS Visitors, School Management Committees, UWS School Staff and Teachers, which are each defined as:

- **UWS School Staff/Teachers:** UWS schools are staffed by a range of support staff and teacher types including assistants, community, volunteer, librarian, private, government, government contract teachers, working at a UWS school whether directly employed by UWS or the Government. Where definition between UWS School staff is required for policy implementation, clarity will be provided on the staff affected.

- **School Management Committees:** Local community bodies responsible for the school's development, established in partnership with local governments.
- **UWS Staff:** includes any paid employee of UWS, including those employed as interns or on fixed term contracts.
- **UWS Associates:** individuals that support the work of UWS in a voluntary capacity, or as an external consultant. This includes but is not limited to UWS Board of Trustees, UWS Advisory Council, UWS volunteers.
- **UWS Visitors:** individuals who visit UWS projects including but not limited to international and local donors and partner organisations.

**UWS Partners:** refers to a Third Party which enters into a formal agreement with UWS, including corporates, school partners, implementing or collaborating partners.

## 5. Key Roles and Responsibilities

All UWS Stakeholders are essential contributors to the effective safeguarding of individuals and must comprehend their respective responsibilities within the scope of their roles. It is imperative for them to recognise their duty to report any concerns related to CPS.

The successful implementation and monitoring of this policy require the specific involvement of various UWS groups and individuals at all levels, including executive, global, country, and local. This Management Structure outlined, and visually represented in the diagram below, is specifically designed to support the reporting and response procedure for cases of concern outlined in Section 8.

All UWS staff are responsible for timely and accurate reporting and escalation of concerns. Line Managers, CPS Leads, Country Directors, and Management/Leadership Teams globally bear accountability in this regard.

### Executive and Global Level

#### Board of Trustees:

- Assume ultimate responsibility for CPS at UWS, placing the safeguarding of staff and children/vulnerable adults at the forefront as a governance imperative.
- Provide governance oversight, strategic direction, and approval for the global implementation of CPS policies, ensuring alignment with the organisation's mission and values.
- Review and endorse CPS policies, fostering a fair, open, and positive culture that actively encourages the reporting of concerns.
- Receive quarterly progress updates and concerns from the Global CPS Lead and Executive Chair, maintaining a transparent and informed approach to CPS implementation at the global level.

#### Board of Trustees CPS Lead:

- Providing valuable feedback on the implementation of the CPS policy, ensuring the Board's insight contributes to continuous improvement.
- Collaborate monthly with the Global CPS Lead to guarantee the effective global implementation of CPS policies
- Act as the central point of contact for concerns related to the Global CPS Lead, Executive Chair, or Global Leadership Team.

- Stay informed about CPS concerns from the Global CPS Lead and the Executive Chair, and provide consultation and support to address reported high and critical severity concerns, ensuring a swift and appropriate response.
- Lead the Board-level policy review, ensuring a comprehensive examination and enhancement of CPS policies to meet evolving standards and challenges.

**Executive Chair:**

- Provide executive oversight for the CPS policy on a global scale, actively working to integrate CPS principles into the organisational culture.
- Promptly notify the Board of Trustees CPS Lead of high and critical severity CPS concerns
- The Executive Chair is informed about high and critical severity CPS concerns by the Global CPS Lead within 24 hours, and provides consultation and support to respond to any reported concerns.
- Stay informed about high and critical severity CPS concerns by receiving reports from the Global CPS Lead within 24 hours.
- Offer consultation and support to the Global CPS Lead and Country Directors, ensuring swift and appropriate responses to reported high and critical severity concerns.

**Global Leadership Team:**

- Hold executive oversight responsibilities, setting the standard for staff through exemplary leadership practices.
- Maintain a comprehensive understanding of key CPS considerations and concerns.
- Regularly engage with the Global CPS Lead and Executive Chair to ensure alignment with global CPS strategies and procedures.
- Ensure strict adherence to the CPS policy within their respective teams, leading by example in embedding CPS principles into daily operations and fostering a CPS-oriented organisational culture.

**Global CPS Lead:**

- Develop and implement a cohesive and effective global organisational CPS strategy. Ensure alignment of CPS efforts across all levels of the organisation for a unified approach.
- Inform and educate staff and partners worldwide about the CPS policy, and support key personnel at global and country levels to enable them in fulfilling their CPS duties effectively.
- Receive immediate notifications regarding all CPS concerns globally and offer timely support to National CPS Leads, Country Directors, Executive Chair, and/or Board of Trustees CPS Lead for effective responses.
- Collaborate with the Marketing and Communications Team and Fundraising Team to integrate Safe Communications guidance and Visitor Guidelines into the organisation's practices.
- Facilitate partnerships to ensure a comprehensive and integrated approach to CPS.
- Conduct regular training sessions for staff on CPS principles, fostering a culture of awareness and responsibility. Provide ongoing support and resources to enhance the capacity of CPS Leads, enabling them to effectively recognise and respond to CPS issues.
- Conduct monthly meetings with National CPS Leads to monitor the implementation of national plans, assess response effectiveness, and enhance staff capacity.

- Regularly reports to the Executive Chair, Board of Trustees CPS Lead, and produces quarterly reports for the Board of Trustees.
- Immediately escalate and report high and critical severity CPS concerns to the Executive Chair and the Board of Trustees CPS Lead, ensuring swift and decisive action.

#### **Operations CPS Lead:**

- Drive the integration and promotion of a global organisational culture in alignment with CPS principles as outlined in the policy. Foster an environment that prioritises and upholds CPS values across all Operations and People functions.
- Coordinate the implementation and promotion of Safe Recruitment Guidelines globally. Provide support to country staff to address local variations in the guidelines to ensure consistent and safe recruitment practices across diverse contexts.
- Collaborate closely with and reporting to the Global CPS Lead to ensure seamless coordination and alignment of efforts.

#### **Country and Local Level**

##### **Country Directors:**

- Hold responsibility for the leadership and operationalisation of the CPS policy within their respective countries. Lead by example, actively promoting robust CPS practices among staff and ensuring strict adherence to policy procedures.
- Appoint suitable National and Regional CPS Leads, ensuring widespread awareness among country staff regarding the contact details of CPS Leads and the CPS Management Structure.
- Advise and support National CPS Leads in responding to concerns within the country, fostering collaboration with partners, and promptly reporting to local and national authorities as mandated by local law.
- Regularly engage with National CPS Leads and Senior Management Teams to maintain a comprehensive understanding of key CPS considerations and concerns spanning all departments.
- Report to the Global CPS Lead and Executive Chair on systemic concerns impacting effective CPS implementation. Additionally, promptly communicate high and critical severity CPS concerns or incidents within 24 hours of receiving a report or concern.

##### **Senior Management Teams:**

- Direct management and operations at the country level, overseeing the effective implementation of the CPS policy within their designated departments and teams.
- Embed CPS principles seamlessly into daily operations, fostering a culture where safeguarding is an integral part of every aspect of work.
- Conduct proactive risk assessments to identify potential CPS concerns, addressing them promptly and efficiently.
- Immediately report on CPS compliance and incidents to the Country Director and National CPS Lead, ensuring swift response and resolution.

##### **National CPS Leads:**

- Central figures in country offices, playing a crucial role in driving national awareness and implementing best practices. Provide expert oversight, coordinate CPS implementation, and ensure effective policy application across UWS schools and departments.

- Train and mentor Regional CPS Leads and Senior Management Teams to foster a culture of vigilance and adherence to CPS principles among all staff. Empower Regional CPS Leads to oversee measures in their areas and provide tailored training for unique challenges.
- Deliver CPS training for country staff, Regional CPS Leads, and new staff during induction to ensure a well-equipped team with the latest knowledge and skills in CPS.
- Facilitate communication channels to keep Regional CPS Leads informed about developments, protocols, and best practices through monthly meetings. Use monthly meetings as a platform for sharing knowledge, insights, challenges, and concerns in and around schools.
- Conduct initial assessments and follow escalation and reporting guidelines in response to CPS concerns in-country. Ensure timely collaboration with local authorities and CP agencies, guaranteeing a consistent application of CPS principles and procedures.
- Report on CPS implementation and compliance progress in regular meetings with Country Directors and the Global CPS Lead. Input concerns, key actions, and learnings into the Global Cause for Concern Tracker, maintaining ongoing updates and escalating issues when necessary.
- Report to local and national authorities in line with national legislation to ensure legal compliance in CPS efforts.
- Actively contribute to CPS audits and lead quarterly monitoring activities.

#### **Regional CPS Leads:**

- Regional CPS Leads serve as key CPS focal points for their respective regional areas and amongst Local CPS Focal Points regarding any CPS concerns, escalating issues and concerns to the National CPS Lead immediately, within 24 hours.
- Coordinate and deliver training to Field Staff such as Education Officers, School Mobilisers, Fellows, to effectively implement and monitor the CPS policy and procedures across all schools within their respective regional area.
- Support responses to concerns and follow-up monitoring, at the direction of the National CPS Lead. Keep the National CPS Lead informed of updates on concerns in real-time.
- Ensure proper recording and storage of all activities related to UWS' response to CPS incidents/concerns with respect for confidentiality within the UWS regional office.

#### **Local CPS Focal Points:**

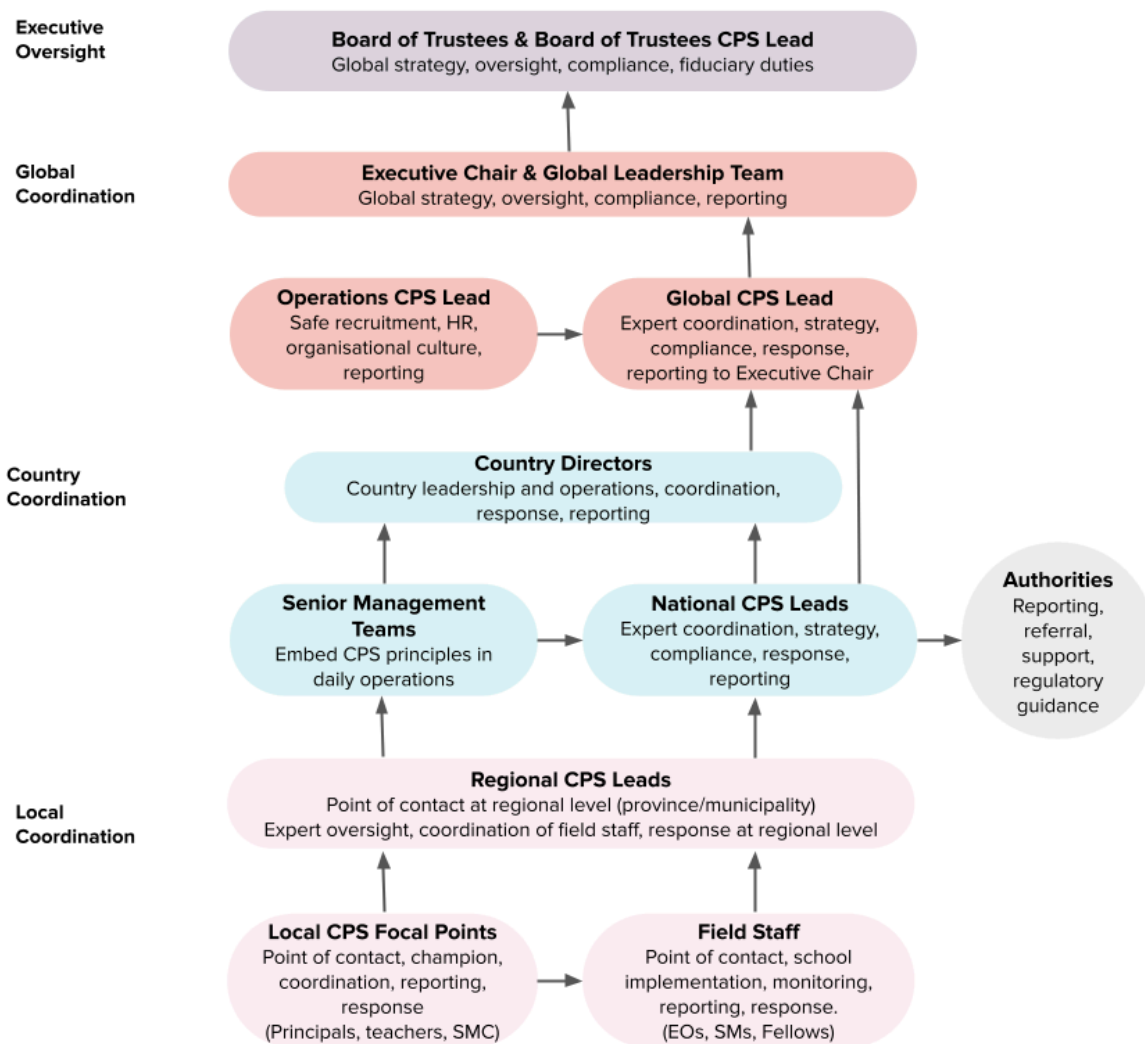
- Comprising the Principal, a School Management Committee member, and/or a Mother's Group member, our Local CPS Focal Points consist of trusted and caring adults deeply embedded and active in both the community and school life.
- Empowered with the crucial task of implementing and enforcing the CPS policy, they report CPS concerns from children, staff, and stakeholders, to UWS Field Officers or Regional CPS Leads, ensuring a secure and supportive environment.
- These committed individuals actively raise awareness about CPS and children's rights, serving as passionate advocates for CPS principles within the local community, fostering a culture of understanding, reporting and protection.
- Local CPS Focal Points play a pivotal role in mobilising local resources and working hand in hand with the community to create an environment where children's rights are safeguarded with care and commitment.



- Recognising their key role, Local CPS Focal Points are instrumental in ensuring the continuity of CPS practices within UWS schools during transitions to government and local ownership. Their dedication becomes a cornerstone for maintaining high CPS standards.

The Management Structure below coordinates CPS processes, aligning with reporting and response procedures. Arrows signify reporting lines, depicting information and responsibility flow. The structure ensures accountability for global and country staff in monitoring, reporting, and addressing concerns, with cases moving through based on severity.

### UWS CPS Management Structure



### 6. Identifying Abuse and Harm

It is essential for all UWS Stakeholders to acknowledge and comprehend various forms of abuse and harm. This understanding should encompass the intersectionality of factors such as disability, gender, caste, religion, language, and other vulnerabilities. Given UWS' engagement with children and vulnerable adults facing multiple risks, it is imperative for UWS Stakeholders to remain vigilant and aware of potential signs of abuse and harm from any source. Recognising these signs is vital

for identifying potential victims, prompting effective intervention, and seeking adequate assistance from appropriate authorities and support services to enable UWS to safeguard those impacted.

In countries where UWS operates, diverse customs and legislations influence interpretations of 'abuse,' thereby shaping responses from statutory bodies and approaches to child protection concerns. While tailored responses may be necessary, it is crucial to adhere to the definitions of abuse and harm outlined in this policy and procedures to maintain a unified CPS approach.

The following are key categories of abuse and harm. UWS Stakeholders must familiarise themselves with these terms, along with their definitions and indicators, and approach with professional curiosity and concern for the well-being of individuals involved in UWS activities.

**Child Abuse:** encompasses all forms of harm and abuse including sexual and physical abuse, neglect, and commercial or other exploitation. This may occur in both online and in-person environments, leading to actual or potential harm to the child's health, survival, development, or dignity.

**Adult Abuse:** A single or recurring act, or the absence of necessary actions, lack of appropriate actions, taking place within a relationship where there is an expectation of trust. This conduct leads to significant harm or distress to an individual aged 18 or above who is in a vulnerable situation. Adult abuse includes physical and sexual abuse, as well as neglect and exploitation that may result in either potential or actual harm. Indicators: Unexplained injuries; Behaviour changes, withdrawal, anxiety; Poor hygiene, malnutrition, untreated health issues; Sudden financial status changes; Humiliation, bullying, psychological distress signs; Restricting social interactions, Loneliness or dependence; Failure to provide necessary medical care, untreated illnesses.

**Child-on-Child Abuse:** Any harmful or abusive behaviour between children, where one child inflicts physical, emotional, or sexual harm upon another. This includes actions such as bullying, harassment, physical violence, emotional harm, or engaging in inappropriate sexual behaviours.

**Neglect:** Refers to a persistent failure to meet physical and/or psychological needs, likely resulting in serious harm to health, development, and well-being. Neglect can span various dimensions, including health, education, emotional development, nutrition, shelter, and safe living conditions. Identifying neglect often involves examining the context, available resources, and intentionality before definitively categorising behaviour as neglectful. Indicators: Poor hygiene, malnutrition, untreated health issues, frequent illnesses, lack of appropriate clothing, inadequate supervision. Given its complexity, neglect remains challenging to identify and necessitates vigilance and regular documentation of observable signs, such as a child being frequently dirty or unfed or disclosing being left unsupervised.

**Exploitation:** The use or attempted use of a power imbalance or a relationship of trust to coerce, manipulate, or deceive a person for sexual, monetary, political, social, or personal gain.

Encompasses sexual exploitation, commercial exploitation (including forced labour and child labour), and trafficking. Victims of exploitation may not always perceive themselves as experiencing abuse or harm, and may even appear to consent. Thus, the appearance of consent does not diminish the risk or the actual harm experienced by the child or vulnerable adult. Indicators: Forced labour, deprivation of education, low school attendance, engagement in illegal activities. Signs of coercion, control, or manipulation.

**Physical Abuse:** Actual or potential physical harm perpetrated by another person, including

hitting, shaking, poisoning, burning, scalding, drowning, suffocating, kicking, pushing, biting, pinching, force-feeding, or deliberately causing illness. Indicators: Unexplained injuries, bruises, fractures, physical discomfort. Frequent injuries with inconsistent explanations. Fearful/ defensive behaviour.

**Sexual Abuse:** involves forcing, coercing, or enticing a child or vulnerable adult into sexual activities, with potential manifestations ranging from physical contact to non-physical acts such as rape, inappropriate touching, showing pornographic images, taking inappropriate photos, exposing body parts, or engaging in any behaviour intended for the perpetrator's sexual gratification.

- **Sexual Harassment:** is a type of sexual abuse encompassing unwelcome sexual advances, requests for sexual favours, or any other behaviour of a sexual nature that may reasonably be expected to cause offense or humiliation, even if it involves a single incident. The scope of sexual harassment and abuse extends across various relationships, including those between children, between children and adults, and between adults, regardless of gender.

Indicators of sexual abuse and harassment: Unexplained sexual knowledge, sudden behavioural changes, physical signs of trauma (bruising, bleeding, pain). Fear/aversion to specific individuals/places.

- **Sexual Exploitation:** a type of sexual abuse, is 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. It can be perpetrated by various individuals, including the public, online, schools, government authorities, or other NGOs. Encompasses instances where a UWS Stakeholder solicits sex in exchange for entitlements within a UWS programme or activity.

Indicators: Significant age discrepancies in relationships, controlling behaviours, isolation from support networks, expressions of fear or anxiety, engaging in age-inappropriate sexual activities, financial dependency, limited personal belongings, a history of abuse, signs of physical harm. Online indicators (explicit material/grooming.)

UWS is committed to upholding the standards outlined in United Nations (UN) and other international standards on preventing sexual exploitation and abuse, including the Inter-Agency Standing Committee core principles on Protection from Sexual Exploitation and Abuse.<sup>2</sup>

**Emotional Abuse:** The persistent emotional maltreatment or ill treatment of a child or vulnerable adult, resulting in harm to their sense of self, well-being, or development. Acts include conveying to children that they are worthless, unloved, or inadequate. Encompasses acts like humiliation, ridiculing, bullying, threatening, scaring, isolating, and other non-physical forms of hostile or rejecting treatment. Some level of emotional abuse may be present in all types of abuse scenarios, even when occurring in isolation. Indicators: Sudden changes in behaviour, withdrawal from activities, fearfulness, anxiety, changes in self-esteem or self-worth. Difficulty forming trusting relationships.

**Online Abuse:** Encompasses various forms of harm facilitated by technology like computers, tablets, and mobile phones. It includes bullying, cyberbullying, emotional abuse, coercion for

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<sup>2</sup> [IASC Six Core Principles | IASC / PSEA \(interagencystandingcommittee.org\)](https://www.un.org/en/development/desa/population/publications/pdf/interagency/interagency_standards_on_prevention_of_sexual_exploitation_and_abuse.pdf)

sexual content, sexual abuse, exploitation. Online platforms can be misused to build relationships for abusive purposes, including grooming.<sup>3</sup> Indicators: Sudden aversion to technology, withdrawal from online activities, changes in online behaviour, decline in mental health.

**Commercial exploitation** entails the exploitation of a child/ vulnerable adult in work or other activities for the benefit of others, to the detriment of the child/vulnerable adult's physical or mental health, education, moral, or social-emotional development. This includes but is not limited to child labour. Indicators: Engagement in inappropriate work; Signs of harm, exhaustion, emotional distress; Absence of education; Hindered moral or social development; Non-compliance with child labour laws; Unsafe environments; Benefit without concern for well-being; Evidence of social isolation or neglect.

**Child Labour:** The unjust and illicit exploitation of a child's labour or resources for personal benefit, encompassing activities that impact physical, emotional, and educational well-being. Indicators: Forced labour; Deprivation of education; Low school attendance; Engagement in illegal activities; Signs of harm, exhaustion, emotional distress;

**Child Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of a child for the purpose of exploitation. A child is considered trafficked if moved within a country or across borders, whether by force or not, with the intent to exploit the child. Indicators: controlled living conditions, signs of coercion or deception, signs of physical or emotional distress.

**Discrimination:** details treating individuals unfairly based on characteristics such as ethnicity, caste, language, religion, gender, or disability. Indicators: Exclusion, biased treatment, denial of opportunities, differential treatment based on personal characteristics. Changes in behaviour or performance.

**Peer Bullying:** refers to a pattern of persistent and deliberate aggressive actions, intentional infliction of harm, or intimidation directed at an individual by their peers. This behaviour is characterised by its repetitive nature, creating an environment where the targeted person experiences a sustained sense of vulnerability and distress. Indicators: Changes in behaviour, emotional distress, unexplained injuries, social withdrawal, decline in academic performance and attendance, fear of attending school.

**Abandonment:** refers to the act of deserting or relinquishing someone or something, often implying a lack of responsibility or care. Indicators: The individual is left alone without any adult supervision or support; Absence of stable living environment, Lack of emotional involvement or concern for the well-being of the person; Lack of financial support or resources; Individual is isolated or left in isolation, lacking necessary connections and relationships.

**Orphan:** An orphan is a child who has lost both parents, either due to death, abandonment, or other circumstances, and is left without a legal guardian. Orphans are considered vulnerable, facing potential challenges in terms of emotional well-being, education, and social integration. Indicators: the absence of one or both biological parents; no legal guardian to provide care, support, and decision-making authority; may be placed in orphanages, foster care, or other institutions for upbringing and care

**Child Marriage:** characterised by any marriage where at least one party is under 18 years of age, is a human rights violation. Forced marriage, a subset of child marriage, occurs when one or both

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<sup>3</sup> [Preventing online harm and abuse | NSPCC Learning](#)

parties have not personally expressed full and free consent to the union. Both are a form of exploitation and can involve trafficking or movement of individuals for the purpose of exploitation.<sup>4</sup>

Child marriage is often associated with early and frequent pregnancy, higher maternal morbidity and mortality rates and represents significant threats to the lives and futures of girls, impacting their agency, disrupting education, and making them more vulnerable to violence, discrimination, and abuse. Indicators: Sudden marriage, withdrawal from education, signs of distress or trauma in the child.

**Child Pregnancy:** The occurrence of pregnancy in a child, often associated with exploitation or abuse. Indicators: Physical changes, emotional distress, withdrawal from usual activities and education.

**School-Related Gender-Based Violence (SRGBV):** Acts or threats of sexual, physical, or mental violence occurring in and around school, directed against a student because of gender. While affecting both boys and girls, SRGBV may disproportionately impact girls due to deep rooted gender stereotypes and unequal power relationships.

Indicators: Disproportionate impact on girls; Changes in behaviour; Unexplained injuries; Decline in academic performance; Isolation and social withdrawal.

**Corporal Punishment:** encompasses the deliberate application of physical force, resulting in pain or discomfort, with the intention of instilling discipline or administering punishment. Within the realm of corporal punishment, there are distinct manifestations of abuse:

- Physical Abuse within Corporal Punishment: involves the use of physical force causing pain or discomfort as a means of discipline. This can include actions such as spanking, hitting, ear pulling, pushing, or other forms of physical coercion.
- Emotional Abuse within Corporal Punishment: Encompasses behaviours like favouritism, humiliation, verbal degradation directed at specific students, or the misuse of corporal punishment as a tool for control rather than genuine discipline.

Indicators of Corporal Punishment may manifest in both perpetrators (typically teachers) and victims:

- Perpetrators: Frequent reliance on physical force for disciplinary purposes; Lack of remorse or adequate justification for excessive disciplinary actions; Avoidance of open communication with parents or guardians regarding disciplinary measures.
- Victims: Unexplained injuries that coincide with the use of corporal punishment; Fearfulness or avoidance of authority figures, particularly those administering discipline; Sudden and notable shifts in behaviour, such as increased aggression or withdrawal from social interactions and school activities.

**Parental abuse** refers to any form of mistreatment or harm that a child experiences by their parents, guardians or caregivers. This can encompass various types of abuse, including physical, emotional, sexual, or neglectful behaviour. Refer to indicators for physical, emotional, sexual abuse and neglect.

**Health and safety** refers to the measures and practices of ensuring the overall well-being, physical safety, and emotional security of children and vulnerable adults. This includes preventing injuries and sickness, promoting hygiene, and providing a secure learning environment in and

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<sup>4</sup> [Child and forced marriage, including in humanitarian settings | OHCHR](#)

around school Indicators: In school: infrastructure issues eg. structural deficiencies, unsafe construction, poorly maintained facilities; inadequate sanitation and hygiene facilities and practices in schools; frequent injuries or sickness. Around the school: students' unsafe living conditions; lack of access to medical care; Insufficient or inadequate sanitation facilities; lack of clean water access.

**Natural Disaster:** Refer to events of immense destructive force caused by natural phenomena, giving rise to a heightened risk of abuse and exploitation. This can manifest as a consequence of the vulnerabilities exacerbated by these disasters, particularly affecting individuals and communities who are ill-equipped to cope with the aftermath. Indicators: Insufficient emergency preparedness; Increased risks during crises (a discernible escalation in the vulnerability of populations during emergencies, such as increased exposure to physical harm, displacement, or loss of essential services, which can create an environment conducive to abuse); Signs of trauma or distress during and after emergencies.

**Emergencies:** Emergency situations within the context of this policy encompass instances of abuse that occur during crises, intensifying existing vulnerabilities. Indicators: Absence of comprehensive emergency plans; Insufficient resources and inadequate training; Exposure to additional dangers due to lack of evacuation plans, medical assistance, or proper shelter. Behavioural changes, increased anxiety, or difficulty coping with the aftermath of a disaster.

#### **Consideration for Intersectionality and Specific Vulnerabilities:**

- **Disability:** Ensure that responses account for the unique vulnerabilities and challenges faced by individuals with disabilities, including recognising abuse and providing appropriate support.
- **Gender:** Acknowledge the specific forms of abuse that individuals may face based on their gender, addressing issues such as gender-based violence and discrimination.
- **Cultural Sensitivity:** Recognise the influence of cultural factors in shaping experiences of abuse and tailor responses accordingly to respect cultural differences.
- **Socioeconomic Status:** Consider the impact of socioeconomic factors on vulnerability to abuse and ensure that responses are accessible and equitable for all socio-economic backgrounds.
- **Language Barriers:** Be aware of language barriers that may hinder communication about abuse and ensure that information and support are available in multiple languages.
- **Caste and Religion:** Recognise the potential for discrimination based on caste or religion and ensure that practices are inclusive and do not perpetuate biases.
- **Geographic Considerations:** Address challenges faced by individuals in different geographic locations, including increased vulnerability during natural disasters or emergencies.

## **7. Prevention**

UWS is committed to ensuring, through awareness and good practice, that all staff and associates prioritise the safety and wellbeing of children and vulnerable adults and use appropriate measures to minimise any risk our activities may pose. UWS embraces the “do no harm” principle and uses the following practices and procedures to prevent harm across all our work.

## 7.1. Operations

- **Policy:** UWS' CPS Policy aligns seamlessly with the UWS Inclusive Education Policy, emphasising the delivery of inclusive education to vulnerable children. Rooted in national safeguarding laws and policies, this commitment extends to adhering to international best practices in child and vulnerable adult safeguarding, even if it entails adopting higher safeguarding protocols than mandated nationally.
- **People:** Child and vulnerable adult safeguarding is a top priority for all UWS Stakeholders, with a collective responsibility for children's wellbeing. Senior executives and managers hold ultimate responsibility, transcending traditional hierarchies. All Stakeholders must champion child safeguarding and report concerns regardless of position.
- **Procedure:** Every child protection concern is treated seriously, prioritising the child's best interests and guided by the 'do no harm' principle. Programmes empower children to express opinions (UNCRC Article 12) and undergo systematic risk assessments, particularly for vulnerable children. Specific initiatives address 'at-risk' groups, ensuring equitable treatment and preserving cultural practices within policy standards.
- **Accountability and Monitoring:** UWS consistently monitors and reviews safeguarding measures, learning from internal and external practices detailed in Section 11.

## 7.2. Code of Conduct

Managers globally must inform their teams about the Global CPS Policy and reporting procedures, promptly addressing any non-compliance. Failure to comply may lead to disciplinary action, including termination. All staff, associates, and partners should be familiar with the UWS Code of Conduct (Appendix C), and leadership/management roles have an added responsibility to model positive behaviour, encourage reporting, and support CPS integration.

UWS upholds high expectations for Stakeholder behaviour. All UWS Stakeholders must read, sign, and adhere to the Code of Conduct upon joining, including employees, volunteers, teachers, and School Management Committees. Line Managers are responsible to monitor that all direct reports have read and signed the policy and Code of Conduct on induction. The Code of Conduct undergoes an annual review, available in multiple languages, and is distributed within each UWS school.

Visitors must read and sign Visitor Guidelines (Section 12) and the Code of Conduct upon arrival to ensure safe and respectful conduct. Due to challenges in conducting criminal record checks, visitors interacting with children must be accompanied by a UWS staff member with CPS training.

## 7.3. Safe Recruitment

Preventing inappropriate individuals from securing roles of trust with children and vulnerable adults is fundamental to UWS' approach. We implement the UWS Safe Recruitment Guidelines to mitigate this risk (Section 12). Procedures include ensuring staff undergo relevant background and criminal record checks for their roles, addressing employment gaps, and utilising competency-based interviewing, especially for positions involving direct contact with children. Recruiting staff must collaborate with and follow the guidance of Country HR departments, overseeing the safe recruitment process and necessary checks under UWS guidelines.

#### **7.4. Learning, Induction, and Training**

UWS is dedicated to fostering a supportive environment that promotes a culture of awareness and responsibility within our organisation. In order to facilitate learning, crucial information regarding CPS is easily accessible to all staff through our dedicated UWS Google Drive. As part of the onboarding process, every staff member undergoes mandatory CPS and Code of Conduct induction training upon joining UWS. This thorough training equips individuals with the necessary knowledge and skills to uphold our commitment to safeguarding children and vulnerable adults.

National CPS Leads in each country are responsible for delivering specialised induction training to country staff, visitors, and volunteers. Global staff and the Board of Trustees undergo induction training through an online video training and assessment, overseen by the Global CPS Lead.

In order to maintain accountability and monitor adherence to CPS standards, both Global and National CPS Leads conduct periodic spot checks and pre- and post-training assessments. These assessments serve as proactive measures to assess compliance levels and identify areas for improvement. Through these periodic checks, we consistently uphold a high standard of vigilance.

In cases of non-compliance, the severity of sanctions is determined based on the nature and extent of the violation. Sanctions may range from additional training to, in extreme cases, termination. We believe in a fair and proportional approach to address non-compliance, prioritising the safety and well-being of children and vulnerable adults as our top priority.

#### **7.5. Safer Programming and Risk Management**

Safe programming is integral to our commitment to 'do no harm' for children and vulnerable adults. It involves assessing the impact of our work, intended and unintended, ensuring safety throughout all stages. All activities with children and vulnerable adults, by UWS or partners, undergo a comprehensive risk assessment during project design. Identified risks are managed throughout the project cycle, including design, delivery, monitoring, evaluation, and exit. This applies to all events led by UWS or partners involving children and young people. UWS aims to provide a safe physical environment, adhering to health and safety measures and considering local contexts. Accessible and child-friendly reporting, response, and feedback mechanisms are ensured.

UWS oversees a centralised risk register, complemented by country-specific National Risk Registers supervised by Country Directors. CPS is monitored through National Child Safeguarding Risk Registers, overseen by the Country Director, Senior Management Team, and the National CPS Lead in each country. Effective risk management follows outlined measures and the UWS Risk Management Policy (appendices).

Key risk areas include schools, children's homes, communities, communications, donor trips, data storage, and disaster risk management. Incident reporting is crucial for addressing these risks promptly, investigating thoroughly, and taking appropriate actions.

UWS implements stringent procedures, including secure school site selection, disaster risk management protocols, safe recruitment, training, and comprehensive background checks. Local community partnerships are integral, significantly contributing to safe programme designs and emphasising robust community buy-in when establishing schools.

**Disaster Risk Management:** UWS integrates a comprehensive disaster risk management process into its programming and across all UWS schools. This involves proactive planning, identification



of potential hazards, and mitigation strategies. Emergency response protocols are established to address unforeseen disasters, safeguarding the well-being of children and vulnerable adults. Regular drills and training sessions including children, teachers and local communities in schools and communities ensure preparedness at all levels, reinforcing our commitment to ensuring the safety and resilience of those we serve.

**Health and Safety Measures:** UWS places a paramount emphasis on health and safety measures to create a secure environment for all stakeholders involved in its initiatives. This includes stringent adherence to health and safety protocols during project implementation and within UWS schools, with a focus on minimising potential health risks. UWS ensures that all educational facilities comply with both UWS' and national health and safety standards relevant to their specific contexts. Regular health and safety inspections are conducted, addressing concerns such as sanitation, hygiene, and infrastructure maintenance. Furthermore, UWS prioritises the health and well-being of its staff, partners, and beneficiaries by providing access to necessary health resources, training on health and safety protocols, and implementing measures to prevent the spread of diseases.

**Safe Construction:** UWS prioritises safety during construction, maintenance, and repair, emphasising CPS risk assessment at the design phase and throughout project management. Building Managers and staff play a crucial role, conducting thorough risk assessments addressing child and vulnerable adult safety concerns. They implement preventive measures in line with national building safety protocols. Children are prohibited from being involved in construction activities. Contractors must have access to the CPS risk assessment and adhere to UWS protocols.

## **7.5. Safe Communication Guidelines**

These guidelines are designed to ensure UWS Stakeholders responsibly and safely communicate within a respectful environment that upholds ethical practices, behaviours, and inclusive values, guided by the overarching principle of 'do no harm'. All UWS Stakeholders, including Staff, Visitors, Partners, Contractors, Volunteers, and others involved in collecting and writing communications content are required to read and sign the Global CPS Policy and Code of Conduct and adhere to this guidance.

**Informed Consent and Responsible Portrayal:** Explicit consent is mandatory before featuring any individual, be it a child or an adult, in any communication. Parental/guardian/carer consent is specifically required for children and vulnerable adults, as indicated in the UWS Consent Form<sup>5</sup>. Portraying individuals responsibly involves avoiding stereotypes and highlighting children as active participants in their educational journey.

**Upholding Children's Rights:** Communications should consistently reflect UWS' commitment to maintaining a safe and inclusive educational environment. A rights-based approach, aligned with the UNCRC, UNCRPD, and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), advocates for the education, protection, and participation of children.

**Dignity, Privacy, and Anonymity:** UWS is committed to safeguarding sensitive or identifiable information, with access restricted in compliance with legal standards and best practices. Upholding the privacy and anonymity of individuals, especially children, is of utmost importance. Explicit informed consent, facilitated by the UWS Consent Form, is vital for ethically sharing stories.

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<sup>5</sup> The UWS Consent Form is currently under review.

Specific details, including full names, addresses, contact information, family details, birthdates, sensitive personal histories, school information, identifiable photographs, visuals, biographical information, and demographic details, should not be shared without explicit consent. Transparency and respect for personal boundaries are paramount, and information must be safely stored.

**Ethical Conduct Expectations:** Adherence to expectations ensures communication integrity, responsibility, and alignment with UWS's mission, policies, and the UWS Code of Conduct. This includes assessing risk to ensure activities 'do no harm', promoting accuracy and truthfulness, respecting diversity and inclusion, maintaining transparency, and openness.

**Inclusive and Safe Language:** Language use should align with the UNCRC, UNCRPD, and UNDRIP in terms of sensitivity. Upholding dignity and respect involves using empowering language, employing inclusive terminology, and avoiding offensive language. Additionally, consideration for accessibility in communication, such as providing alternative formats and respecting indigenous cultural protocols, is essential.

## **7.6. Due Diligence for Partners, Contractors, and Visitors**

UWS is dedicated to conducting thorough due diligence to ensure the suitability and safety of partner organisations and contractors involved in projects and programmes, irrespective of funding sources. When collaborating with partners engaged in direct or indirect activities with children or vulnerable adults, a comprehensive CPS due diligence assessment will be carried out. This involves a meticulous review of the partner to confirm the presence of appropriate safeguarding procedures. The assessment establishes clear lines of responsibility and reporting between all parties involved, ensuring partners are aware of their obligation to report all CPS concerns to UWS. In instances where partners lack adequate policies and procedures, UWS will actively assist in developing suitable guidelines and practices. UWS encourages partners to undertake their own due diligence on UWS CPS and commits to complying with any requests.

UWS is committed to ensuring that UWS Partners and Visitors adhere to elevated standards in preventing harm to children. All UWS Partners will receive this policy, and agreements with them will include a provision stipulating that partners without a child safeguarding policy must either adhere to the UWS policy or develop their own as a condition for the partnership. While enforcing the UWS policy with external partners may not always be feasible, we reserve the right to choose not to collaborate, impose specific conditions, or terminate partnerships based on a comprehensive assessment of partners' safeguarding policies and implementation. UWS expects strict adherence to the UWS Code of Conduct and Visitor Guidelines (appendices) by any UWS Stakeholder, Partner, or donor visiting schools, reinforcing these principles.

UWS anticipates rigorous safeguarding policies within our Partner School community fundraising activities where it is likely that UWS staff members will have contact with Partner School students through in-person and online events and assemblies. If not feasible or if policies are inadequate, agreements will ensure schools conform to the UWS policy or develop their own as a contractual obligation. UWS staff may only visit partner schools after a Disclosure and Barring Service (DBS) or criminal record check, adhering consistently to the school's visitor guidelines and code of conduct. Virtual interactions between UWS Stakeholders, Staff and Partner School students must be supervised by a teacher or another UWS staff member. During visits, UWS staff must be aware of the school partner's CPS Policy and know the channels for reporting any abuse. If the concern involves a UWS Stakeholder, it must be reported to both systems.

## 7.7. Safeguarding During Emergencies

Recognising the possibility of external factors rendering our established support and reporting systems impractical, we understand that emergency or crisis scenarios pose additional threats to the safety and welfare of children. In such instances, we are committed to taking every possible measure to fulfil our duty of preventing harm and ensuring that children under our care feel secure, protected, and content. Consequently, it is imperative to underscore the importance of thorough risk assessment and mitigation strategies in emergency situations, seamlessly integrated into National CPS Risk Registers.

Specifically, if adjustments to Reporting and Responding to Concerns protocols (Section 8) are deemed necessary based on the circumstances, such modifications will be made following a meticulous risk assessment to ensure actions are aligned with the best interests of the children involved. Whenever deemed appropriate and safe, supplementary interventions supporting children's well-being, such as awareness campaigns and community engagement, should be implemented.

## 7.8. Whistleblowing Policy

UWS acknowledges that a robust CPS framework is rooted in a culture of accountability and vigilance. Any concerns related to misconduct, especially those posing a potential risk to children and vulnerable adults, must be reported promptly. UWS Stakeholders and partners are urged to utilise the secure and confidential channels specified in the Whistleblowing Policy (Section 12) if they find it challenging to report a concern through the standard reporting protocols.

## 8. Reporting and Responding to Concerns

This section succinctly details the duties of UWS Stakeholders in promptly reporting concerns, including the reporting process, response protocol, and support mechanisms, ensuring a timely and coordinated effort. It emphasises a commitment to continuous learning, improvement, and the protection of individuals involved in UWS programmes.

### 8.1. When to Report a Concern

It is the responsibility of all UWS Stakeholders to promptly report any observed, suspected, or disclosed child and vulnerable adult protection and safeguarding concerns **within 24 hours**. This encompasses the following situations:

- Concern or evidence that a child and/or vulnerable adult is currently experiencing or is at risk of harm or abuse, whether from a family member, a member of the public, another NGO staff member, a government authority staff member, or a UWS Stakeholder or Staff member.
- Concerns about the conduct of UWS Stakeholders or Staff members.
- Concerns about the conduct of staff/associates within UWS Partners, external agencies, government/authorities or NGOs.

### 8.2. How to Respond to a Disclosure or Incident

UWS Staff members should be well-prepared to respond if children or vulnerable adults disclose abuse or they witness an incident and follow these guidelines:

- **If there is an immediate risk of harm or if there is an emergency, immediately contact the police, children’s services or other emergency services in line with local law, unless doing so would increase the risk of harm.**
- Acquaint yourself with the indicators of abuse and approach the situation with professional curiosity and empathy. Listen attentively, allowing the individual to dictate the pace of the conversation, maintaining a calm and supportive demeanour. Acknowledge the individual for sharing their concerns and refrain from passing judgement or assigning blame.
- Pose open-ended questions to clarify concerns and assess risks, avoiding leading questions. Emphasise that confidentiality cannot be guaranteed, and the necessity of reporting must be explained. Reassure the individual that reporting will be handled with sensitivity, and they will be kept informed to the extent possible.
- Never retain concerns privately, withhold concerns or attempt independent investigations; report them promptly to a CPS Lead, relevant Line Manager, UWS Staff Member within 24 hours, following the guidance in Section 8.3.

### **8.3. How to Report a Concern**

It is crucial for UWS Stakeholders to promptly report any concerns to a CPS Lead, relevant Line Manager or a UWS Staff member within 24 hours. Immediately upon observing, suspecting, or having a concern disclosed, the individual must:

#### **1. Complete the UWS Cause for Concern Form (Part 1) immediately**

If the form is not available or accessible, reports can be submitted verbally, in writing or through other communication methods, including verbal, written, sign language, visual submissions and other methods. Individuals are encouraged to utilise the secure and confidential channels specified in the Whistleblowing Policy (Section 12) if they find it challenging to report a concern through the standard reporting protocol.

#### **2. Submit the completed Cause for Concern Form or Report**

We encourage individuals to submit the Cause for Concern form or report via other communication methods **immediately and within 24 hours** to an appropriate CPS Lead, relevant Line Manager or UWS Staff Member, or email to [childprotection@uwsglobal.net](mailto:childprotection@uwsglobal.net).

Stakeholders in and around UWS schools including community members, parents/guardians, School Management Committees and students, can report to a Local CPS Focal Point or relevant UWS Staff member working at the school, such as Education Officers, School Mobilisers, Fellows, or a relevant Regional CPS Lead, whose contact information is made available to them.

In incidents or concerns involving these individuals, reporting should go directly to the Global CPS Lead, Country Director or Executive Chair. If reaching the designated person is not feasible, staff should approach the next most senior person.

If there is ongoing concern for the safety of a child/vulnerable adult or if the concern has not been addressed seriously by UWS staff, concerns should be escalated to the Executive Chair or Board of Trustees CPS Lead immediately and within 24 hours.

### **8.4. Response Protocol**

The protocol below establishes a systematic approach UWS Staff must follow in handling initial reports. The outlined steps and responsibilities aim to ensure a harmonised and time-sensitive

approach to managing CPS concerns across all levels of our organisation. The five principles guiding our approach are: survivor-centred, accessible, do no harm, flexible, impartial, and just.

### Step 1. Initial Report

Immediately, within 24 hours:

- The UWS Staff member receiving the submitted report should immediately share the Cause for Concern Form (Appendix D) or report to the National / Global CPS Lead, within 24 hours.
- If there is an immediate risk of harm or if there is an emergency, immediately contact the police, children’s services or other emergency services in line with local law, unless doing so would increase the risk of harm.

### Step 2. Initial Assessment and Intervention Plan

Within 24 hours upon receipt:

- The National / Global CPS Lead will conduct the CPS Concern Risk Assessment Tool (Appendix E) to assess the level of risk and potential impact on the child/ vulnerable adult.
- The National/Global CPS Lead develops an intervention plan, documenting this in CPS Concern Risk Assessment Tool (Appendix E).

### Step 3. Determine Concern Severity

Using the Severity scores from the Concern Risk Assessment Tool, the National/Global CPS Lead assesses the severity of the concern by referring to the guidance provided in the table below. Subsequently, they implement the appropriate response based on the severity level as indicated in the guidance.

Threshold & Scoring Criteria	Response Guidance
<b>Mild Severity</b>	
<p>No immediate or apparent threat to the child/adult’s safety, well-being, or rights. The situation does not require urgent intervention or immediate protective measures.</p> <p><i>Scoring: No immediate danger (0 points) No or minimal harm anticipated (0). Minimal impact or resilient coping (0). Strong protective factors (0)</i></p>	<ul style="list-style-type: none"> <li>- Standard protocols and training may be sufficient for addressing concerns.</li> <li>- Provide guidance and support to involved parties, emphasising preventive measures and awareness.</li> <li>- Document and track any observed changes in the child's behaviour or situation over time.</li> </ul>
<b>Medium Severity</b>	
<p>Some risk to the child/ vulnerable adult’s safety; requires attention and intervention, but not immediate crisis response.</p> <p><i>Scoring: Some risk of danger or</i></p>	<ul style="list-style-type: none"> <li>- Timely intervention and monitoring are essential to prevent escalation.</li> <li>- Consult with relevant professionals, specialists, or authorities for insights and guidance.</li> <li>- Consider involving additional support services, such as</li> </ul>

<p><i>concerns (1-2 points). Moderate harm with potential impact (1-2). Moderate impact with potential long-term effects (1-2). Some protective factors (1-2)</i></p>	<p>counselling or educational resources.</p> <ul style="list-style-type: none"> <li>- Conduct regular check-ins with the child, caregivers, involved parties to assess progress and changes in the situation.</li> </ul>
<p><b>High Severity</b></p>	
<p>Significant risk to the child/ vulnerable adult’s safety; urgent intervention needed to prevent harm.</p> <p><i>Scoring: Immediate risk requiring urgent action (3-4 points). Significant harm likely (3-4). Significant impact with likely long-term consequences (3-4). Moderate protective factors (3-4).</i></p>	<ul style="list-style-type: none"> <li>- Urgent measures are necessary to mitigate risks and ensure the child/adults immediate safety.</li> <li>- Immediately report to- and seek advice from- the Global CPS Lead, Board of Trustees CPS Lead and Executive Chair.</li> <li>- Conduct an in-depth investigation, collaborating with local authorities and child protection specialists.</li> <li>- Implement protective measures and support services for the child, adult and involved parties.</li> <li>- Establish a clear communication plan to keep Stakeholders informed and engaged throughout the intervention process.</li> <li>- Conduct regular check-ins with the child, caregivers, and involved parties to assess progress and changes in the situation.</li> </ul>
<p><b>Critical Severity</b></p>	
<p>Imminent and severe risk to the child/ vulnerable adult’s safety; requires emergency response to prevent immediate harm.</p> <p><i>Scoring: Immediate danger requiring emergency response (5+). Severe harm imminent (5+). Severe impact with immediate intervention required (5+). Limited or absent protective factors (5+)</i></p>	<ul style="list-style-type: none"> <li>- The child is in immediate and severe danger, and there is an urgent need for emergency response.</li> <li>- Immediately report to- and seek advice from- the Global CPS Lead, Board of Trustees CPS Lead and Executive Chair.</li> <li>- Immediate removal or separation from the source of harm may be necessary to ensure the child/adult's safety.</li> <li>- Involve law enforcement and child protective services urgently.</li> <li>- Activate emergency support services and initiate crisis intervention measures.</li> <li>- Conduct regular check-ins with the child, caregivers, and involved parties to assess progress and changes in the situation.</li> <li>- Conduct debriefings with all involved parties after the emergency response to assess the effectiveness of interventions and ensure the well-being of the child and caregivers.</li> </ul>

**Step 4. Escalation**

Immediately, within 24 hours following initial assessment:

- The National/Global escalates the concern according to the Concern Severity, following the guidelines above.
- Documents all concerns in Global Cause for Concern Tracker, with automatic reporting to the Global CPS Lead and Country Directors.
- In high and critical cases, the Country Director / Global CPS Lead informs the Executive Chair and Board of Trustees CPS Lead via email within 24 hours.
- The UWS Executive Chair reports high and critical CPS incidents to the Board of Trustees.

### **Step 5. Consultation & Collaboration**

Within 24 hours following initial assessment:

- Global CPS Lead offers expertise on assessment and intervention, documenting details in Part 3 of Cause for Concern Form within 24 hours.
- In high and critical cases, consult the Executive Chair and Board of Trustees CPS Lead for expert advice on the initial assessment, emergency response plan, and intervention plan.

### **Step 6. Involvement of Local Authorities and Government-Related Cases**

- Collaborate with local child protection authorities when a CPS concern arises, following local laws and procedures.
- Oversight of reporting and case transfers by the National CPS Lead and Country Director, complying with local law mandates.
- The transfer of case management responsibility to local authorities may happen under the following circumstances:
  - Legal mandate requiring involvement of local authorities,
  - Severity of the case surpasses UWS' effective capacity.
  - Child or vulnerable adult's best interests are better served by local authorities due to jurisdiction or cultural considerations.
- In cases involving government-affiliated individuals eg. government teachers:
  - Prompt reporting of alleged perpetrators who are government teachers or registered with the government to the relevant education or regulatory body.
  - Collaborate with government agencies for a coordinated approach, adhering to legal requirements and protocols.
- Maintain open communication and cooperation with local child protection agencies and relevant government entities throughout the case management process.
- Share relevant information and updates with both local child protection agencies and government bodies for a coordinated and collaborative approach.

### **Step 7. Disciplinary Process**

Within 24 hours following initial assessment:

- UWS Staff, Volunteers, or Associates accused of abuse face immediate, unbiased suspension. Suspension from duties involving contact with children and vulnerable adults during formal investigation until UWS disciplinary action is taken.
- Contracts may be terminated immediately pending formal investigation outcomes by the Country Director/Executive Chair.
- The Country Director/Executive Chair reports criminal accusations to relevant authorities in both the individual's country of operation and their country of residence.
- For allegations against government teachers in UWS schools, National CPS Lead reports to and collaborates with the Local Education Authority and the Department/Ministry of Education. UWS reserves the right to act independently in case of delays.

### **Step 8. Formal Investigation, if necessary**

24 hours following Initial Assessment:

- Key stakeholders, including the National/Global CPS Lead, Country Director, Executive Chair, Board of Trustees CPS Lead, and relevant authorities, collaborate to decide on the need for a formal investigation, considering specific case circumstances.
- Initiate a formal investigation promptly if the Initial Assessment indicates severity, potential risks to the involved child/vulnerable adult, case complexity, and legal compliance. This

includes high and critical severity cases.

- Upon identification of seriousness, potential harm, or complexity, UWS shifts from initial response to a structured formal investigation, led by the National CPS Lead in collaboration with the Country Director and relevant authorities.
- Appoint an investigator or team with child protection expertise, define a comprehensive scope and terms of reference aligned with local laws, and develop an approved investigation plan with key stakeholders, including the Global CPS Lead, Country Director, Executive Chair, Board of Trustees CPS Lead, and relevant authorities.
- Ensure preservation of evidence with measures for integrity, confidentiality, and protection of involved parties.
- Conduct structured interviews, collaborate with law enforcement, and provide regular updates to stakeholders while adhering strictly to legal requirements.
- Compile a comprehensive report, sharing findings with key stakeholders.
- Determine disciplinary actions in consultation with legal advisors, HR, and leadership, communicating decisions promptly and taking necessary organisational steps.
- Maintain meticulous records securely, adhering to legal and organisational requirements.
- Provide support to survivors, witnesses, and staff involved in the investigation, ensuring access to counselling and resources for recovery and well-being.

### **Step 9. Implement Response**

Within 72 hours of initial assessment and 24 hours for high/critical severity concerns:

- Provide support for children/vulnerable adults, including external referrals when needed.
- National CPS Leads handle in-country cases with support from Country Director and Global CPS Lead. Global CPS Lead manages global-level reports with support from Board of Trustees CPS Lead and Executive Chair.

### **Step 10. Documentation**

Ongoing, updated as new information emerges or progress is made:

- The National/Global CPS Lead maintains a detailed log including interventions, responses, and changes, recorded in the Global Cause for Concern Tracker.

### **Step 11. Follow-up Monitoring**

Ongoing throughout the process; and following case closure;

- National/Global CPS Lead leads a case review meeting, involving relevant stakeholders in reassessing safety concerns, updates risk assessment based on evolving information, and adjusts interventions for ongoing safety.
- Provide feedback to the initial reporter.

### **Step 12. Case Closure**

- Case closure occurs when the individual is no longer at significant risk and existing harm has been addressed.
- The decision is made by the National CPS Lead and Country Director, with confirmation from the Global CPS Lead. Advisory input is sought from the Executive Chair and Board of Trustees CPS Lead for high and critical severity cases.
- Closure may happen when the case is referred to protection agencies actively investigating and taking remedial actions.

### **Step 13. Learning**

Continuous learning throughout the process and after case closure:



- Reflection and identify improvement areas with involved parties
- Protocols updated if necessary based on reflections
- CPS Lead inputs learnings in Global Cause for Concern Tracker
- Learning process facilitates identification and response to emerging patterns, guiding improvement of safeguarding measures and knowledge.

### **8.5. Historical or Non-Recent Abuse Disclosures**

The terms "historical abuse" or "non-recent abuse" pertain to accusations of mistreatment that transpired during the victim's childhood and are disclosed when the individual is now an adult or still a child, often long after the abuse took place. UWS must respond to allegations of historical/non-recent abuse with rigorous standards similar to current abuse allegations. This includes potential persistence by perpetrators, providing support to the individual, and the possibility of legal proceedings if sufficient evidence is collected.

### **8.6. Allegations Involving UWS Staff, Associates, and Government Teachers**

If there is reason to suspect a UWS staff member or associate poses a risk to a child or vulnerable adult, report promptly to the National/Global CPS Lead, Country Director, Executive Chair, or Board of Trustees CPS Lead within 24 hours. The Whistleblowing policy safeguards those concerned, even if concerns prove unfounded.

In abuse accusations against a UWS Staff member, Volunteer or Associate, an immediate, unbiased suspension from duties involving contact with children or vulnerable adults is mandated. This suspension lasts until a formal investigation concludes, leading to UWS disciplinary action. Pending investigation outcomes, UWS may terminate contracts immediately. This policy extends to violations beyond the individual's UWS work. Individuals can appeal decisions following UWS' disciplinary policy. UWS reports criminal accusations to relevant authorities in both the UWS Stakeholder's country of operation and their country of residence.

Government teachers undergo the same training as UWS staff. In the case of allegations against government teachers working in UWS schools, the National CPS Lead collaborates with the Local Education Authority and the Department/Ministry of Education to investigate and take necessary action. UWS reserves the right to act independently in the case of delays.

UWS respects statutory inquiries by government protection agencies/law enforcement, offering resources, support, advice, and oversight. Cases remain open until UWS ensures risks are eliminated, and appropriate support is provided. Closure does not end UWS' involvement if continued interaction is anticipated. UWS does not participate in formal investigations conducted by government protection agencies and/or law enforcement, but rather supports these processes. UWS remains committed to working collaboratively to ensure the safety and well-being of all children and vulnerable adults involved in our programmes.

### **8.7. UWS Support for Staff and Associates**

Staff addressing safeguarding and child protection concerns, especially those responding to abuse disclosures, will receive debriefing opportunities. Discussions on emotions and feelings related to the situation are also encouraged. These sessions will involve the Global Leadership Team and Global CPS Lead for global staff, and the Country Director and National CPS Lead for country staff. UWS may offer a referral to external trauma-informed counselling services if requested. UWS prioritises confidentiality, safeguarding staff from potential backlash.

Whistleblower protections cover those reporting concerns, and any retaliation is strictly prohibited, subject to disciplinary action.

## 9. Promoting Awareness

UWS actively promotes widespread awareness of our Global CPS Policy by disseminating it among all Stakeholders during induction, translated into local languages. Key safeguarding personnel ensure their roles are known and accessible and CPS information is available on the UWS Google Drive, with updates shared through internal reports. UWS cultivates a collective responsibility for CPS through education, training, and heightened awareness, involving diverse stakeholders and forming collaborative partnerships to establish a robust support network.

- **Staff Training:** Mandatory induction training for UWS Staff, Associates, and Volunteers ensures understanding and adherence to CPS policy and procedures within the first week, with regular refresher sessions for child-facing staff to reinforce principles and provide updates on best practices. Additionally, all staff members are required to complete a simple online test to confirm their comprehension of the policy, serving as an ongoing assessment tool for continuous awareness. For child-facing staff, annual testing is implemented to ensure a continual understanding of the policy's intricacies.
- **Teacher and School Leadership Training:** UWS provides induction and refresher programs for school staff, emphasising practical CPS policy implementation. We conduct pre-assessments to gauge participants' knowledge and skills, followed by post-assessments to measure program effectiveness and identify areas for improvement, ensuring a culture of CPS proficiency.
- **Empowering Children:** Age-appropriate educational programmes and annual consultations empower children in CPS decisions. Child-friendly CPS posters with hotline numbers are displayed in classrooms.
- **Engaging Parents, Guardians and Community:** UWS communicates the CPS policy to parents and the community through annual meetings, workshops, and campaigns, providing information on reporting options and awareness sessions for a secure environment at home and in school.
- **Collaborative Partnerships:** UWS collaborates with local authorities to strengthen child protection systems at the country and local level, aligning with regulations for an effective approach to safeguarding children.

## 10. Application of this Global CPS Policy in (Insert Country Name Here)

Given the diverse legal, social, and cultural contexts across different countries, the protocols for legal reporting and reaction are contingent upon specific circumstances and vary amongst the countries UWS operates. It is strongly encouraged to adhere to the high standards set forth by UWS' Global CPS Policy. However, any national adaptations or variations should be clearly documented and justified in the table provided below, aligning with National CPS Risk Registers.

Prior to travelling to a country, Staff, Associates and Visitors are required to familiarise themselves with the local procedures outlined. The National CPS Lead takes the lead, supported by the Senior Management Team and the Country Director to conduct a comprehensive country analysis, subject to an annual review.

**CPS Country Context Form**

<b>Country Office</b>	
<b>Date Completed</b>	
<b>National CPS Lead Name and Contact Details</b>	
<b>Country Director Name and Contact Details</b>	
<b>Other Authors/Contributors</b>	
<b>Summary of Legislation and Government Guidance</b> pertaining to the welfare/ safeguarding/protection of children and vulnerable adults, including aspects of disability, mental health, trafficking, exploitation, etc.	
<b>Implementation/ Enforcement Analysis:</b> Extent of implementation/ enforcement of relevant legislation and government guidance, highlighting barriers or issues.	
<b>Authorities and Organisations:</b> Listing government agencies, local authorities, and organisations with legal authority for safeguarding, including those related to disability, mental health, trafficking, etc.	
<b>Victim Support Services:</b> Details of health, welfare, and other services available for safeguarding response, victim support.	
<b>Alternative Care Arrangements:</b> Legislation, services, authorities, or organisations related to institutions, residential care, foster care, kinship care, or other alternative care arrangements.	
<b>International Conventions:</b> Details of international conventions on welfare/ safeguarding/protection that the country is a signatory to. Include analysis of the extent of implementation or links to such information.	
<b>Law Enforcement Position:</b> Local police/statutory service position on investigating criminal offences against children and vulnerable adults.	

<b>Legal Age of Consent:</b> Legal age of consent for children and legislation covering this, along with information on consent for adults with disabilities or reduced capacity	
<b>Harmful Practices:</b> Identification of harmful practices such as early marriage and pregnancy, etc., locations where prevalent.	
<b>Attitudes and Behaviours:</b> Observation of attitudes, beliefs, or behaviours in the country and communities that may cause harm.	
<b>Community-Based Mechanisms:</b> Details of informal or community-based justice and safeguarding mechanisms.	
<b>NGOs and Protection Services:</b> Information on NGOs and organisations providing protection or prevention services.	
<b>Professional Networks/Alliances:</b> Details of professional networks/ alliances involved in safeguarding, rights, and protection.	
<b>Additional Relevant Information:</b> Any other pertinent information not covered above but relevant to safeguarding in the specific context.	
<b>National Adaptations and Justification:</b> Any local adaptations or variations should be clearly documented and justified and align with National CPS Risk Registers.	

## 11. Accountability and Monitoring

This policy places a strong emphasis on accountability and ongoing enhancement through a systematic approach. Regular assessments, self-audits, monitoring mechanisms, and comprehensive reviews, including spot checks, form the foundation of our proactive strategy.

- UWS mandates strict adherence to the Global CPS Policy for all UWS Stakeholders. Annually, UWS Staff reaffirm their dedication to this policy and the accompanying Code of Conduct.
- The Executive Chair, the Board of Trustees CPS Lead, and Global CPS Lead engage in periodic evaluations of policy effectiveness, presenting an annual report to the Board of Trustees.
- Recommendations for policy changes are meticulously considered, drawing input from the Board of Trustees CPS Lead, Global Leadership Team, Country Directors, Senior Management Teams, and National CPS Leads to prioritise continuous accountability and improvement.

- Under the guidance of the Global CPS Lead, standardised self-audit and reporting structures are overseen. This includes annual self-audits for country offices, generating action plans based on identified strengths and areas for development.
- Bi-annual case reviews, led by the Global CPS Lead, inform policy revisions, emphasising a commitment to learning from incidents and analysing reporting patterns.
- At the school level, quarterly monitoring is conducted, with programme managers promptly addressing identified gaps. This aligns with National CPS implementation plans, with progress reported to the Board of Trustees every three months.
- During monthly school visits, UWS Education Officers, School Mobilisers and Fellows prioritise CPS dialogue with Local CPS Focal Points, parents, Principals, teachers, School Management Committees, and Mother's Groups. This proactive approach fosters open communication, awareness, transparency, and collaborative efforts to identify, prevent, and address potential CPS concerns within the school community.
- Annual consultations with UWS Stakeholders are conducted to ensure policy clarity. Prompt actions are taken to address any ambiguity, particularly in cases involving UWS Staff or Stakeholders.
- High and critical severity cases, involving UWS Staff or Stakeholders, undergo careful review to apply appropriate organisational learning, treating incidents as 'near misses' and incorporating insights into future policies.
- Regular spot checks complement ongoing monitoring efforts to ensure continuous adherence and effectiveness.

## 12. Related Policies, Guidance, Resources

- [Safe Recruitment Guidelines](#)
- [Reference form for Community Teachers](#)
- [UWS Visitor Guidelines](#)
- [UWS Whistleblowing Policy](#)
- [UWS Risk Management Policy](#)
- [Inclusive Education Policy](#)

Please contact [childprotection@uwsglobal.net](mailto:childprotection@uwsglobal.net) if you are unable to access the links or if you would like the Nepali, Burmese, Malagasy, French, or Khmer versions.

## Appendix A: Statement of Commitment to CPS

### Self-Disclosure:

Any information provided will be treated confidentially, securely stored, and handled in accordance with relevant data protection legislation and guidelines. All disclosed information will be carefully evaluated by HR Departments and National/Global CPS Leads in each country for its relevance to the UWS role and will be used solely for the purpose of safeguarding children, young people, and vulnerable adults.

Have you, a close family member, or someone in your household ever been identified by any children’s services department, police, or court as posing a risk or potential risk to children or vulnerable adults?	YES	NO
Have you ever been subject to an inquiry or investigation by any organisation, employer, or entity due to concerns about your conduct toward children or vulnerable adults?	YES	NO
Have you ever undergone disciplinary proceedings or been requested to leave employment or volunteer work due to inappropriate behaviour toward children/vulnerable adults or being deemed a risk to them?	YES	NO
Kindly provide additional information for any questions where you answered yes.		

### Commitment to Safeguarding and Child Protection:

“I, \_\_\_\_\_[name]\_\_\_\_\_, confirm having reviewed and comprehended the standards and protocols detailed in UWS’ Global Child Protection and Safeguarding Policy and UWS Code of Conduct. I endorse the principles contained therein and commit to adopt and advocate for the procedures and practices.

I affirm my commitment to promptly inform UWS within 24 hours if I, a close family member, or a member of my household is subsequently investigated by any agency or organisation concerning concerns about behaviour toward children/vulnerable adults. I understand that UWS may share the information provided on this form with relevant parties when necessary for safeguarding purposes. In alignment with organisational procedures, I also agree to UWS verifying any disclosed information with agencies, authorities, or organisations capable of providing pertinent information.

I acknowledge that any actions contrary to the principles of this policy and supporting documents, whether in the course of employment or in my private life, may be regarded as gross misconduct. I commit to promptly disclose any charges, convictions, or other outcomes related to offences against child/vulnerable adult exploitation and/or abuse, occurring before or during my association with UWS.

Moreover, I commit to immediately report any concerns or allegations related to child/vulnerable adult safeguarding in accordance with UWS procedures outlined in this policy. I declare that the information provided is accurate and complete to the best of my knowledge.”

\_\_\_\_\_ (Print name)

\_\_\_\_\_ (Job title / role)

\_\_\_\_\_ (Signature)

\_\_\_\_\_ (Date)

Please submit the completed form to the HR department in your country.

## Appendix B: Key CPS Contact Details

Role	Name	Contact Details
Board of Trustees CPS Lead (UK)	Olivia de Groot	<a href="mailto:oliviadegroot@yahoo.co.uk">oliviadegroot@yahoo.co.uk</a>
Executive Chair (UK office)	Peter Taylor	<a href="mailto:ptaylor@uwsglobal.net">ptaylor@uwsglobal.net</a>
Global CPS Lead (country office)	Ellie Wilson	<a href="mailto:ellie@uwsglobal.net">ellie@uwsglobal.net</a> <a href="mailto:childprotection@uwsglobal.net">childprotection@uwsglobal.net</a>
Operations CPS Lead (UK office)	Roxy Jafarifar	<a href="mailto:rjafarifar@uwsglobal.net">rjafarifar@uwsglobal.net</a>
Cambodia National CPS Lead (country office)	Sreynak Hun	<a href="mailto:sreynak.hun@uwsglobal.net">sreynak.hun@uwsglobal.net</a>
Nepal National CPS Lead (country office)	Avinash Jha	<a href="mailto:avinash@uwsglobal.net">avinash@uwsglobal.net</a>
Myanmar National CPS Lead & Myanmar Officer in Charge (country office)	Patrick Eai Hsu	<a href="mailto:patrick@uwsglobal.net">patrick@uwsglobal.net</a>
Madagascar National CPS Lead (country office)	Edward Tsitohery	<a href="mailto:edward.tsitohery@uwsglobal.net">edward.tsitohery@uwsglobal.net</a>
Cambodia Country Director (country office)	Sokha Mok	<a href="mailto:smok@uwsglobal.net">smok@uwsglobal.net</a>
Nepal Country Director (country office)	Surya Karki	<a href="mailto:surya@uwsglobal.net">surya@uwsglobal.net</a>
Madagascar Country Director (country office)	Karine Le Gallo-Razafindrazaka	<a href="mailto:karine.legallo@uwsglobal.net">karine.legallo@uwsglobal.net</a>



## Appendix C: UWS Code of Conduct

These guidelines, established by UWS, ensure exemplary conduct and acceptable behaviour in engagements with children, vulnerable adults, and community members. All Stakeholders, including staff, associates, volunteers, teachers, School Management Committees, and other school-community groups, must read and sign during induction, consistently adhering to the Code of Conduct.

While not exhaustive, this list articulates minimum standards. Upholding overarching principles of good practice is imperative for staff and associates, recognising their responsibility and, in some cases, legal duty for the safety of those they engage with.

This Code embodies UWS's commitment to promoting the rights of children and vulnerable adults, setting expectations for Stakeholder responsibilities, and establishing practice and behaviour standards. Adherence is crucial to maintaining the integrity of UWS and safeguarding the well-being of all involved in UWS' activities.

### **Promoting Rights:**

UWS affirms the rights of children and vulnerable adults to:

- Prioritise their health, safety, and wellbeing, with a focus on their best interests.
- Have their welfare and development actively promoted, safeguarded, and supported for the realisation of their full potential.
- Be valued, respected, and understood within the context of their culture, gender, religion, ability, sex, ethnicity, caste, and language.
- Have their views listened to, considered carefully, and be encouraged to participate in decisions affecting them.

To ensure the respect of these rights, UWS Stakeholders must:

- Foster a safe work environment by treating everyone, including children, vulnerable adults, members of the wider community, and colleagues, with respect, equity, dignity and fairness while maintaining professional boundaries consistently.
- Ensure that their work is conducted safely, without causing harm to anyone, by incorporating CPS principles into their activities as appropriate.
- Report any CPS concerns promptly to a designated CPS Lead or Line Manager.
- Disclose any criminal record or caution to their UWS Line Manager or Education Officer through the self-disclosure form in Appendix A.

### **Practice and Behaviour Standards**

UWS adopts a strict policy of zero tolerance for any instances of bullying, harassment, sexual exploitation, abuse, or any form of maltreatment. This policy applies universally, encompassing actions directed at children, vulnerable adults, colleagues, or any other individuals.

### **All UWS Stakeholders MUST:**

- Report concerns or incidents promptly within 24 hours to a UWS staff member, CPS Lead, or relevant Line Manager.
- Respond promptly to concerns or allegations of abuse.
- Uphold the integrity and reputation of UWS through professional and personal conduct aligned with UWS' mission and principles.

- Behave in a manner that avoids unnecessary risks to safety, health, and well-being.
- Be aware of situations that may present risks and manage them appropriately.
- Plan and organise events and work to minimise risks.
- Be visible when working with children and vulnerable adults, as far as possible. Ensure that another adult is present when working in the proximity of children whenever possible.
- Foster a culture of openness to enable the raising of issues or concerns.
- Establish a sense of accountability among staff to prevent poor practice or potentially abusive behaviour from going unchallenged.
- Engage in positive ways of managing children's behaviour, avoiding physical punishment or degrading treatment.
- Provide enthusiastic and constructive feedback rather than negative criticism.
- Offer advice and support to children and vulnerable adults on how to keep themselves safe.
- Ensure that visitors to the school sign in and follow the Visitor guidelines.
- Treat all data/photos/incidents involving children as confidential and store them securely.
- Comply with all relevant local legislation, including labour laws regarding child labour.
- Strive to be an excellent role model.
- Conduct observations and interviews with staff to assess awareness of the organisation's concern for child safeguarding and key documents.
- Prioritise children's and vulnerable adults' best interests in decision-making, involving them in decisions about activities, policies, and processes when possible.

#### **UWS Stakeholders MUST NEVER:**

- Physically assault or abuse children and vulnerable adults in any way.
- Take part in any form of harmful conduct or establish a sexual or romantic relationship with anyone in the community where UWS operates, irrespective of their age.
- Exchange or attempt to exchange money, employment, goods, or services for sexual acts, with a strict prohibition against staff and associates buying sex.
- Misappropriate UWS goods/aid for personal use, distribute them to unauthorised recipients, or attempt to exchange them for sexual favours or monetary gain, such as bribes.
- Use computers, mobile phones, video cameras, cameras, or social media inappropriately, or exploiting or harassing children or accessing child exploitation material.
- Develop relationships with children and vulnerable adults that could be deemed abusive, exploitative, or for personal gain.
- Act in ways that may place a child or vulnerable adult at risk of harm or abuse.
- Use inappropriate, discriminatory, or sexually provocative language.
- Condone or participate in illegal, unsafe, or abusive behaviour of children.
- Act in ways intended to shame, humiliate, belittle, or degrade children or vulnerable adults, or perpetrate any form of emotional abuse.
- Discriminate against, show differential treatment, or favour particular children or vulnerable adults to the exclusion of others.
- Sleep in the same room or bed as a child or vulnerable adult with whom they are working.
- Consume alcohol, smoke, or be under the influence of illegal substances while responsible for children and/or vulnerable adults or at a UWS school (including in the evenings when they may be called upon in an emergency).

- Discuss confidential information in front of children/vulnerable adults.
- Be “friends” with children/vulnerable adults on personal social media or use a personal phone to contact them. Professional boundaries should be maintained at all times.
- Show or encourage children/vulnerable adults to search for or watch sexually explicit or violent content online.
- Hire children for domestic or other labour that interferes with education or places them at risk.
- Form relationships with children outside the school or the function of their role (e.g., inviting unaccompanied children into their home).
- Speak negatively about a child’s physical or learning disability.
- Use their position of power to intimidate, bully, threaten, discriminate against, or undermine.
- Show favouritism or develop an unprofessional relationship with UWS students.
- Use any information about children for personal gain or share information without approval from their line manager.
- Take pictures of children without asking their permission first.
- Take inappropriate photos of children, including sexually explicit photos or photos of children in a state of undress.
- Share pictures of children on personal social media accounts.
- Ignore concerns raised by a child, vulnerable adult, or by someone on their behalf.
- Invite unaccompanied children into their home unless they are at immediate risk of injury or physical danger.
- Sleep close to unsupervised children unless necessary, with supervisor permission and another adult present if possible.
- Involve children and vulnerable adults in any construction, maintenance and repair activities. This is strictly prohibited.

“I \_\_\_\_\_[name]\_\_\_\_\_ acknowledge that I have read and agree with the UWS Global Child Protection and Safeguarding Policy and commit to abiding by the aforementioned Code of Conduct. I understand that any breaches will be reported, and appropriate action will be taken in line with the policy.”

\_\_\_\_\_ (Print name)

\_\_\_\_\_ (Job title / role)

\_\_\_\_\_ (Signature)

\_\_\_\_\_ (Date)

Please submit the completed form to the HR department in your country.

## Appendix D: UWS Cause for Concern Form

The UWS Cause for Concern Form is a critical tool for reporting and managing CPS concerns within the organisation. The reporting process involves three key parts: Part 1 is completed by the individual first aware of the concern and is then forwarded to a UWS Staff member, relevant Line Manager, or CPS Lead. The National/Global CPS Lead conducts an Initial Risk Assessment and inputs to Part 2, while the Global CPS Lead completes Parts 3 and 4.

Anonymous reporting is facilitated through the Whistleblowing policy. The form is available in multiple languages and can be completed in the preferred language of the reporter. This comprehensive approach emphasises transparency, inclusivity, and effective management of CPS concerns within the UWS community.

<b>Part 1: Reporting Person's Section</b>	
Your Name	
Your Position	
Date	
Your knowledge of and relationship to the child/ Vulnerable adult	
Child/Vulnerable adult Name	
Child/Vulnerable adult Gender	
Child/Vulnerable adult Grade	
Child/Vulnerable adult Current Address	
Child/Vulnerable Adult Date of Birth/Age	
Date and Time, of any incident observed/ reported	
Location and School Name	
Describe the nature of the safeguarding concern/allegation. <i>Clearly articulate the incident, providing a factual and objective account of what was witnessed, heard or reported. Include relevant observations like visible injuries and emotional state. If there is immediate concern, state reasons why. Continue on a separate sheet if needed.</i>	

Immediate actions taken so far following receipt of the concerns	
Condition of child/adult following the incident	
School staff or parent/guardian contacted? Date & time.	
Have you reported this to a CPS Lead within 24 hours? Verbally/writing?	
<b>Part 2: CPS Lead's Comments and Actions following Initial Assessment</b>	
Name	
Date	
Role/Position	
Concern Code	
Additional Comments	
Action recommended or already undertaken by the CPS Lead	
Has the threshold for referral to local child protection agencies, police or other relevant bodies been met? Provide the reasoning.	
Are there concerns that referring the case to other agencies is not in the child / vulnerable adult's best interests?	
If the threshold has been met, but there are concerns that a referral is not in the child/ vulnerable adult's best interest, please immediately refer to the UWS Global CPS 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/vulnerable adults best interests based on the information at hand.
What is the risk if you do not refer the case to the child protection agency? What negative outcomes for the child/vulnerable adult 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 do not refer the case to the child protection agency?	
Risk Factors/Additional Vulnerabilities	
Protective Factors	
Severity Level	
Initial assessment score	
Any other comments	
Date and Time of referral and discussion with Global CPS Lead	
Date and Time Country Director informed, if relevant	
Insert Link to initial assessment and additional case notes/records	

**Part 3. Global CPS Lead Comment and Actions**

Name	
Date	
Escalation Level	
Comments and Actions	
Insert Link to additional case notes/records	
Date Case Closed	
Closure Summary and Explanation	
<b>Part 4. Case Closure</b>	
Date case closed	
Closure Summary and Explanation	

## Appendix E: CPS Concern Risk Assessment Tool

This tool comprehensively evaluates risk factors related to the safety and well-being of children and vulnerable adults after receiving a cause for concern report. It assesses impact, risks, severity, and recommends immediate and preventive interventions. The National/Global CPS Lead conducts the initial risk assessment within 24 hours of receiving the report. The completed tool integrates into the Global Cause for Concern Tracker, with details entered in Part 2 of the Cause for Concern Form by the National/Global CPS Lead. Collaborating with experts is essential for high and critical severity cases to ensure a thorough risk assessment and the formulation of an effective intervention plan

**Name:**

**Role/Position:**

**Date completed:**

**Incident ID:**

Category & Factors	Assessment Notes	Score	Threshold (Scoring)
<b>Background Information</b>			
<b>Child/Adult Information:</b> Age; Gender; Developmental Stage			No specific concerns (0 points); Mild concerns (1-2 points); Significant concerns (3-4 points); Severe concerns (5+ points)
<b>Family and Living Arrangements:</b> Caregivers; Siblings; Living Conditions			Stable and supportive (0 points); Some concerns (1-2); Moderate concerns (3-4); High instability or risk (5+)
<b>Educational and Social Context:</b> School attendance; peer relationships; Community support			Positive and supportive (0 points); Some concerns (1-2); Significant challenges (3-4); High risk or absence of support (5+)
<b>Risk Factors</b>			



<p><b>History of Concerns:</b> Previous CPS reports/ interventions; Past incidents or allegations; Patterns of concerns.</p>			<p>No history or minimal concerns (0 points); Some history or isolated incidents (1-2); Repeated incidents/concerning patterns (3-4); Ongoing and severe concerns (5+)</p>
<p><b>Caregiver Capacity:</b> Caregiver's understanding of child development; Availability and capability to provide adequate care; Mental health and well-being of caregivers.</p>			<p>Adequate and supportive (0 points); Some concerns (1-2); Moderate capacity challenges (3-4); Significant challenges or incapacity (5+)</p>
<p><b>Environmental Factors:</b> Neighbourhood/community safety; Exposure to violence or substance abuse; Access to support services</p>			<p>Safe and supportive environment (0 points); Some concerns (1-2); Unsafe or challenging environment (3-4); High risk or absence of support services (5+)</p>
<p><b>Behaviour and Wellbeing:</b> Child/adult's Behavioural changes or concerns; Emotional well-being; Physical Health</p>			<p>Stable and positive (0 points); Mild concerns or changes (1-2 points); Moderate concerns or significant changes (3-4); Severe concerns or immediate risks (5+)</p>
<p><b>Severity Indicators</b></p>			
<p><b>Immediate Danger:</b> Presence of immediate threats; Risk of harm to the child in the next 24 hours; Need for emergency intervention</p>			<p>No immediate danger (0 points); Some risk or concerns (1-2); Immediate risk requiring urgent action (3-4) Immediate danger requiring emergency response (5+)</p>

<b>Level of Harm:</b> Severity and potential impact on the child; Likelihood of harm occurring; Level of distress experienced by the child			No or minimal harm anticipated (0 points); Moderate harm with potential impact (1-2); Significant harm likely (3-4); Severe harm imminent (5+)
<b>Impact on Child/Adult:</b> Emotional and psychological impact, Long-term effects, Resilience and coping mechanisms			Minimal impact or resilient coping (0 points); Moderate impact with potential long-term effects (1-2); Significant impact with likely long-term consequences (3-4); Severe impact with immediate intervention required (5+)
<b>Protective Factors:</b> Availability of a support system; Positive coping mechanisms; Engagement in community and school activities			Strong protective factors (0 points); Some protective factors (1-2); Moderate protective factors (3-4); Limited or absent protective factors (5+)
		<b>TOTAL SCORE:</b>	<b>Mild Risk:</b> 0 - 10 points; <b>Medium Risk:</b> 11 - 20; <b>High Risk:</b> 21 - 30; <b>Critical Risk:</b> 31+.
		<b>SEVERITY LEVEL:</b>	Mild, medium, high, severe

<b>Professional Consultation, if necessary</b>	
Input from mental health professionals	
Consultation with child protection specialists	
Collaboration with educators or healthcare providers	

<b>Documentation and Monitoring</b>	
Comprehensive recording of assessment details	
Inclusion of relevant case history and previous interventions	
Ensuring all legal and ethical standards are met	
Regular follow-up schedule	
Procedures for ongoing assessment and reassessment	
Mechanisms for updating the risk assessment tool	
<b>Recommendations and Action Plan</b>	
<b>Interventions and Recommendations</b>	
Based on the risk assessment, outline specific interventions required	
Recommendations for immediate actions	
Collaboration plan with relevant professionals, agencies/local authorities	
<b>Urgent Intervention Plan</b>	
Immediate actions required to address imminent	

risks	
Emergency response plan detailing steps for urgent intervention	
Coordination with emergency services and law enforcement if needed	