

# Transform Trade

**POLICY AND PROCEDURE**

**SAFEGUARDING  
POLICY**

## TRANSFORM TRADE POLICY AND PROCEDURE

### SAFEGUARDING POLICY

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## B. INTRODUCTION

This policy applies to the work of Transform Trade incorporating Traidcraft Exchange (operating as Transform Trade), local offices and Traidcraft Exchange Services India Private Limited.

Transform Trade recognises that both children and some adults can be vulnerable and may be subject to harm or abuse. It is never acceptable for anyone to be abused. All abuse involves the abuse of an individual's rights. Transform Trade is fully committed to safeguarding the welfare of all children, young people and vulnerable adults and recognises its responsibility to take all reasonable steps to promote safe practice and to protect children and vulnerable adults from harm, abuse and exploitation. Transform Trade acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse. This is particularly important to us as a values-led organisation.

All children and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from all forms of abuse.

This policy states what Transform Trade will do to minimise the risks, promote good practice and take necessary steps to ensure the safety of both children and vulnerable adults using our services and/or premises.

This policy covers all children and vulnerable adults who come in contact with Transform Trade whether in the UK or overseas. However we recognise that it can be difficult or challenging to apply this policy in different countries and local contexts. When working overseas we will therefore work with local staff and local partner organisations to develop a common understanding of safeguarding issues, and develop procedures which are appropriate to the local context.

### Definitions

Please note that throughout this document the following terms apply:

- **Safeguarding** is the protection of everyone's right to be safe and protected from abuse.
- **Abuse** is a violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, sexual, verbal or psychological; it may be an act of neglect or an omission to act or it may occur when a vulnerable person is persuaded to enter into financial or sexual transaction to which he or she has not consented or cannot consent; it may be an abuse of power.
- **Vulnerable individual** refers jointly to children and vulnerable adults.
- **Child or Children** refers to anyone under the age of 18, but this policy notes that this may differ in other countries<sup>1</sup>.

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<sup>1</sup> The *UN Convention on the Rights of the Child* defines a 'child' as a person below the age of 18, unless the laws of a particular country set the legal age for adulthood younger. The Committee on the Rights of the Child, the monitoring body for the Convention, has encouraged States to review the age of majority if it is set below 18 and to increase the level of protection for all children under 18.

- **Vulnerable adults** are people who are over 18 years of age who are considered vulnerable according to the particular activities that are being undertaken at the time, regardless of how often they are undertaken. For example, a vulnerable adult could be someone who:
  - has a physical or sensory disability
  - has a learning disability
  - has mental health problems
  - is older
  - is disadvantaged or potentially vulnerable due to their life circumstances

We also note that in the context of Transform Trade’s work, vulnerability could also arise as a result of power imbalances between beneficiaries or producer groups and Transform Trade’s staff.

- **Staff** refers to all those persons to whom this policy applies and includes all Transform Trade and Traidcraft Exchange staff plus other individuals that Transform Trade engages to carry out work on our behalf such as agency workers, volunteers, consultants, researchers, photographers etc. ‘Staff’ does **not** refer to Transform Trade Fair Traders, speakers, nor the staff of partner organisations implementing Transform Trade projects, though such organisations are expected to apply good practice safeguarding standards and procedures to their work (see section E).
- **Regulated activity**
  - **Statutory Guidance** detailing what constitutes regulated activity in the UK can be found via the DBS website.
  - **Regulated activity** relating to Children involves:
    - Teaching, training, instructing, caring for or supervising Children; or,
    - Providing guidance/advice on well-being to Children and vulnerable adults; or,
    - Driving a vehicle only for Children.
 And
    - Happens frequently (once a week or more often)
 Or
    - Happens intensively (on 4 or more days in a 30-day period, or overnight, even once)
 And
    - The individual is unsupervised
 Or
    - The activity involves supervising someone who would otherwise be in a Regulated Activity.
  - **Regulated activity** relating to adults, involves:
    - Healthcare for adults provided by, or under the direction or supervision of a regulated health care professional.
    - Personal care for adults involving hands-on physical assistance with washing and dressing, eating, drinking and toileting; prompting and supervising an adult with any of these tasks because of their age, illness or disability; or teaching someone to do one of these tasks.
    - Social work - provision by a social care worker of social work which is required in connection with any health services or social services.

- Assistance with an adult's cash, bills or shopping because of their age, illness or disability arranged via a third party.
- Assisting in the conduct of an adult's own affairs under a formal appointment, e.g. By virtue of an enduring power of attorney.
- Conveying (transporting) adults for reasons of age, illness or disability to, from, or between places, where they receive healthcare, personal care or social work arranged via a third party
- **Barred person** is someone that is listed as being barred from working in regulated activity. The lists are managed by the Disclosure and Barring Service.
- **DBS** is the UK Non-Departmental Public Body called the Disclosure and Barring Service (DBS).
- **Designated person** is a member of Transform Trade staff to whom people can talk about safeguarding matters. Transform Trade's designated person in the UK and for senior management purposes will be the CEO and the Senior Human Resources and Operations HR Manager. We recognise the importance of locally designated individuals for staff who are not based in the UK. Locally based designates will be:
  - Country Director, Bangladesh
  - Finance and Administration Manager, East Africa Regional Office
  - Business Head, India

## Objectives

The specific objectives of this policy are to ensure that:

- Vulnerable individuals who use our services or premises are not abused and that Transform Trade's working practices minimise the risk of such abuse.
- The welfare of a vulnerable individual is recognised as paramount and to ensure they are provided with appropriate safety and protection whilst working with/visiting Transform Trade;
- All staff understand their legal and moral responsibility to protect vulnerable individuals from harm, abuse and exploitation
- All suspicions and allegations of abuse are taken seriously and responded to swiftly and appropriately;
- All staff are able to make informed and confident responses to specific safeguarding issues;
- There is a thorough and clearly defined method of recruiting and selecting staff, which is consistently applied; and
- Transform Trade keeps up-to-date with legal and good practice developments relating to the welfare and protection of vulnerable individuals.

## Review Date:

This policy will be reviewed annually, or earlier as required. This policy was last reviewed in October 2020.

## Cross Reference:

Equality and Diversity,  
Recruitment and Selection,  
Managing Conduct,  
Whistleblowing

Overseas Travelling with Transform Trade.

### **C. RESPONSIBILITIES**

There will be a specific management process adopted in order to facilitate the implementation of the Safeguarding Policy and Procedures.

Although the Transform Trade Boards have overall responsibility to ensure the implementation of the Safeguarding Policy, there will be designated individuals to whom people can talk about safeguarding matters. The Senior Management responsibility for the implementation of this Safeguarding policy will be the CEO supported by the Senior Human Resources and Operations Manager.

The responsibilities of the CEO will include:

- Promoting awareness and implementation of the policy throughout the organisation.
- Monitoring implementation of the policy and reporting annually to the Board.
- Maintaining knowledge of best practice and statutory requirements.
- Reporting information, as appropriate to relevant bodies.

Transform Trade will maintain open lines of communication where understanding abuse and listening and responding to concerns are the main priority. Transform Trade will create an atmosphere of support and encouragement for those who feel it necessary to report concerns. Transform Trade will continue to promote a positive environment for giving and receiving feedback.

Managers will reflect the organisation's core principles and values, upholding a professional approach toward safeguarding issues and demonstrating awareness of matters of abuse.

In addition to formal Performance Review meetings, staff may utilise regular one to one meetings to discuss general safeguarding matters with their line manager. These meetings will allow managers to provide ongoing support and monitoring to those staff who work directly with vulnerable individuals. Should staff have concerns which they do not feel able to discuss with their line manager, they may speak with their line managers' line manager, or Transform Trade's designated person.

### **D. RECRUITMENT AND SELECTION OF STAFF**

Transform Trade recognises that careful recruitment makes an important contribution to the protection of vulnerable individuals. Transform Trade will ensure that all reasonable steps are taken so that unsuitable people are prevented from working with vulnerable individuals.

#### **1. Authority to Recruit**

Where a role includes (or is likely to include) regulated activity or work with vulnerable individuals, then this will initially be highlighted in the 'Authority to Recruit form'. The Recruiting Manager and authorising Senior Management Team member will not submit the

role for advertising without first (working with the HR team where necessary) ensuring the following:

- **The job description** has been assessed in order to identify:
  - whether it would be classed as exempt under the Rehabilitation of Offenders Act 1974, and whether it would be eligible for a DBS check, and the level of any such check.
  - Whether the role's involvement with vulnerable individuals requires a specific skillset, level of experience or other selection criteria requirement.
  - Where necessary, the job description document has been amended to include these requirements.
- **Advertisement text** for jobs or secondment opportunities (both internally and externally advertised) clearly state that relevant screening will take place for anyone who is given a conditional offer.

The HR team will not progress advertisement of roles without receipt of fully completed authority to recruit paperwork.

## **2. Application**

We will ask at application stage for details of any convictions, as allowed under legislation in force.

## **3. Interview**

Shortlisted candidates will undergo a standardised interview process, which, where a role involves work with vulnerable individuals, will additionally include:

- Specific questions at interview on safeguarding and the candidate's commitment to, and respect for, safeguarding policies, practices and procedures as well the applicant's motivation for working with vulnerable individuals.
- Heightened attentiveness by the interview panel to anything suspicious in employment history (including gaps).
- The requirement for the potential member of staff to substantiate their qualifications.
- The requirement for the potential member of staff to provide evidence of identification, by the means of specified documentation **in advance of** commencement of employment.

## **4. Pre-Employment Checks**

Where a role involves work with vulnerable individuals, successful candidates will be subject to heightened pre-employment checks as follows:

- The requirement to provide a minimum of two referees (not including family members) that can be verified by telephone and who are able to provide a written reference.
  - The existence of the referees will be confirmed.
  - A specific question will be included in the reference pro-forma about the candidate's suitability to work with vulnerable individuals.
- The requirement for the potential member of staff to undergo (in the UK) a Disclosure and Barring check through the DBS, or (for overseas roles) an equivalent local 'good conduct' or similar formal check, as available. In the absence of available checks, Transform Trade will seek additional information from an expanded number of

referees. These processes do not guarantee that an individual is safe to work with vulnerable individuals. Transform Trade will use the information from a DBS check alongside information from the recruitment process in order to assess the individual's suitability and assess any potential risk regarding the appointment. *N.B. Transform Trade may use the services of an Umbrella Body compliant with the DBS Code of Practice (which can be accessed by [this internet link](#)) to administer the checks on our behalf.*

Information arising from DBS or equivalent international checks will be assessed in line with policy on the Recruitment of Ex-offenders as noted in Transform Trade's Recruitment and Selection Policy; and the DBS Code of Practice.

## **5. Induction**

All staff will undergo a thorough induction during an initial probationary period which will include an opportunity to familiarise him or herself with Transform Trade's Safeguarding Policy.

The new member of staff will be required to read, understand and accept compliance with Transform Trade's Safeguarding Policy and guidelines as part of their terms and conditions of employment. This process will include signing a Statement of Commitment to the policy, guidelines and associated Safeguarding Code of Conduct. [**Annex 2**].

## **E. OUR WORK WITH THIRD PARTY ORGANISATIONS OR INDIVIDUALS**

Individual supporters, Transform Trade Fair Traders, speakers and other individuals who undertake activity of their own accord by way of supporting Transform Trade's work are not covered by this policy. Wherever possible, in guidance or other event materials, Transform Trade will encourage individuals to the high safeguarding standards it expects, however this policy acknowledges that these individuals and their actions fall outside of Transform Trade's direct control.

Whilst partner organisations are not directly covered by this policy, identification and selection of partner organisations will include appropriate due diligence checks to enable partner organisations undertake effective and robust approach to safeguarding and the protection of vulnerable individuals.

Where an assessment of a partner organisations' safeguarding policy and practice identifies weaknesses, a risk assessment should be undertaken before taking decisions on the implications to the (potential) partner relationship. Where appropriate, an improvement plan may be agreed.

Transform Trade will continue to require high safeguarding standards throughout the partnership agreement. In cases where these standards are found to fall below an acceptable level, Transform Trade may take action to terminate the partnership agreement.



## **F. WORK EXPERIENCE PLACEMENTS**

It will not always be necessary for Transform Trade to carry out a DBS (or international equivalent) check for staff who will be involved in hosting work experience placements, but this may vary depending on circumstances. Where a member of staff has a specific designated responsibility for supervising a student, particularly if the student is under 16, is a vulnerable student for any reason (e.g. a student with special educational needs) or where the supervisor will spend a substantial amount of time alone with the student, the school or college may ask for Transform Trade to carry out a check. However, it is unlikely that schools and colleges would ask an employer to conduct a check on staff who are simply working alongside the student.

Where a staff member has been disqualified from undertaking regulated activity, the law requires that they must raise this if they are requested to take part in supervising students on work experience.

The following precautions should be taken, as a matter of good practice, when preparing and hosting a work experience placement:

- Work experience placements should be structured so that one student is not working routinely or one to one with a staff member where supervision of work experience placements is not part of their normal duties.
- The location(s) for all aspects of the work experience placement should be agreed well in advance and should not be changed at short notice and without consent.
- Work experience students should not be left alone to work unsupervised.
- Work experience students should not have unsupervised access to the Internet.
- Transform Trade staff should avoid being alone or in an enclosed room with a student.

Under health and safety legislation, Transform Trade owes a duty of care to work experience students, just as they do to any employee. Employers' existing workplace risk assessments may already cover the risks that work experience students may be exposed to. Transform Trade's existing employer's liability insurance will cover young people, but line managers should generally check this on a case by case basis.

## **G. EDUCATION AND TRAINING**

Staff who will have direct contact with vulnerable individuals in the UK or overseas and their managers will be fully trained in Transform Trade's behaviour protocols and guidelines and will be provided with clear guidelines on who to contact in the event of any concerns.

All staff with regular contact with vulnerable individuals are expected to take part in safeguarding awareness training in order to help staff to:

- Analyse their own practice against established good practice, and to ensure that their practice is likely to protect them against false allegations;
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse;
- Respond to concerns expressed; and

- Work safely and effectively with vulnerable individuals.

This training may be provided by a voluntary organisation (for example NSPCC, or by a local statutory agency). Transform Trade undertakes to ensure that such training is available for staff as part of their induction programme as they commence the new role.

## **H. BEHAVIOUR PROTOCOLS**

In order to reduce the likelihood of abuse taking place, staff will adhere to the Safeguarding Code of Conduct, as included in Annex 3 of this policy. The Code of Conduct includes guidance on appropriate and expected standards of behaviour for adults towards vulnerable individuals, and also of vulnerable individuals towards other vulnerable individuals.

The Code shall be easily accessible on Transform Trade's MyHRToolkit system for all Transform Trade staff and our Sharepoint intranet for all organisational representatives. Organisational representatives will promote copies of the Code of Practice in all situations where the organisation is responsible for bringing vulnerable individuals into contact with adults.

The Code of Conduct should be interpreted in a spirit of transparency and common sense, with the best interests of the vulnerable individual as the primary consideration.

When working internationally, staff must understand and respect the local norms around physical contact between vulnerable individuals and adults.

## **I. COMMUNICATION GUIDELINES**

Access to printed and electronic personal information about vulnerable individuals should be restricted to the minimum number of people who need to know within the organisation.

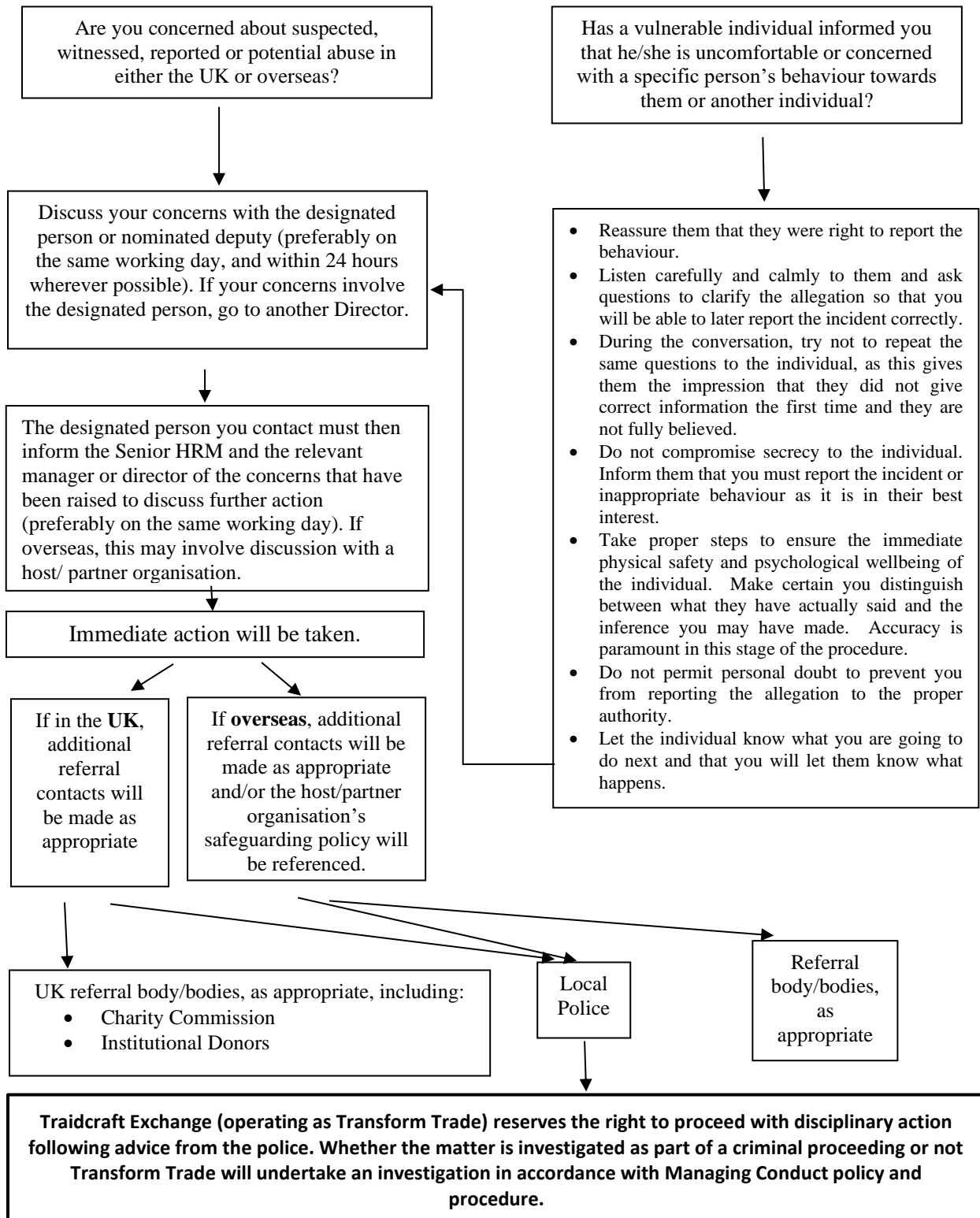
Everyone has a right to be accurately represented through both words and images. Transform Trade's portrayal of any vulnerable individual must not be manipulated or sensationalised in any way.

To the greatest possible extent, Transform Trade should acquire informed consent/the permission of the individual, their guardian and/or NGO responsible for the individual in order to use the image for publicity, fundraising, awareness raising or other purpose (which should be made clear to the individual or organisation giving consent).

Transform Trade has a duty of care to communicate to schools, youth groups etc that Transform Trade Fair Traders and speakers are not covered by this policy and therefore may not have undertaken a Disclosure and Barring check through the DBS.

## J. RESPONDING TO ALLEGATIONS OR SUSPICIONS

There is a process for reporting and reacting to witnessed, suspected or alleged abuse and/or violation of the Safeguarding Policy:



### **1. Allegations from a Vulnerable Individual**

When a vulnerable individual informs you that he/she is uncomfortable or concerned with a specific person's (adult or child) behaviour towards them or another vulnerable individual, the following steps must be taken:

- Reassure them that they were right to report the behaviour.
- Listen carefully and calmly to them and ask questions to clarify the allegation so that you will be able to later report the incident correctly.
- During the conversation, try not to repeat the same questions to the individual, as this gives them the impression that they did not give correct information the first time and they are not fully believed.
- Do not compromise secrecy to the individual. Inform them that you must report the incident or inappropriate behaviour as it is in their best interest.
- Take proper steps to ensure the immediate physical safety and psychological wellbeing of the individual. Make certain you distinguish between what they have actually said and the inference you may have made. Accuracy is paramount in this stage of the procedure.
- Do not permit personal doubt to prevent you from reporting the allegation to the proper authority.
- Let the individual know what you are going to do next and that you will let them know what happens.

### **2. Allegations from Another Source**

Transform Trade must take all appropriate steps within its power to protect the vulnerable individual in question from further harm. If the concerns involve immediate harm, the member of staff must act without delay, as inaction may place the vulnerable individual in further danger. If a member of staff knows any information about the maltreatment of a vulnerable individual, it is their responsibility to tell someone.

All staff must therefore act immediately and report suspicions, however uncertain, to the designated person (or nominated deputy) in accordance with the Reporting Procedure outlined above.

### **3. Types of Action**

The designated person (or nominated deputy) may in turn seek guidance on further action in the local context (if overseas) or from local social services and the police (if in the UK).

#### *Action in the UK:*

The designated person (or nominated deputy) will usually seek the advice of social services, police, or other appropriate source in deciding whether a formal referral is necessary. If it is suspected that a crime has been committed the designated person will contact the Police. Police and social services reporting procedures will then be followed.

If Transform Trade dismisses or removes someone from regulated activity (or would have done had they not already left) because they harmed or posed a risk of harm to vulnerable groups, they will make a referral to the DBS. N.B. A referral should not be made when an allegation is first made. Transform Trade will first undertake an investigation and evidence

gathering in order to establish if the allegation has foundation. Without evidence or information for the DBS to consider, many allegations will be quickly closed down as there will be no basis on which the DBS can proceed.

If it is decided that external reporting is not appropriate, then there must be a clear rationale for that decision which must be recorded. The decision not to report must be approved by an Executive Director.

#### *Action Overseas:*

The designated person (or nominated deputy), in communication with the Senior HR and Operations Manager, will seek the advice of local social services, legal advisors, police, or other appropriate source in deciding whether a formal referral is necessary. If it is suspected that a crime has been committed the designated person will contact the Police. Local police and/or social services reporting procedures will then be followed.

Should allegations arise in connection with a host or third party organisation, or whilst a member of Transform Trade's staff is being hosted by or is visiting a third party organisation, further communication with the host or third party organisation may be considered appropriate. The purpose of this will usually be to ensure that the host or visiting organisation is aware of the concerns raised. It may also be to seek further clarification of the host or third party organisation's Safeguarding Policies and procedures.

If it is decided that external reporting is not appropriate, then there must be a clear rationale for that decision which must be recorded. The decision not to report must be approved by the CEO.

#### *Reporting*

A list of internal and external potential contacts for reporting purposes is included in Annex 3.

#### **4. Violation of the Policy**

If an allegation of a violation of the safeguarding policies, guidelines, principles or practices is made concerning a named individual from a verifiable source against any member of staff, they may be suspended from all activity and association with Transform Trade pending the outcome of an impartial investigation. During this time, staff will continue to receive full pay.

If following the investigation it is decided that there is a case to answer against a member of staff, disciplinary action under the Managing Conduct policy will be recommended.

Transform Trade will also take other action, which may be appropriate under the circumstances. This may mean for example for:

- Volunteers – ending the relationship with Transform Trade
- Partners – withdrawal of funding and/or support
- Contractors – termination of contract

Depending on the nature, circumstances and geographical location of the case, Transform Trade will also consider involving authorities such as the police to ensure the protection of vulnerable individuals and adherence to the law where this is appropriate.

## **5. Maintaining Records**

Transform Trade has a standardised system for reporting incidents, concerns and referrals, which ensures that such information is stored securely.

Transform Trade's Human Resources Department will retain a copy of allegations made, and action taken.

Where investigated, the investigation report will be retained in the member of staff's personal file. The record will contain details of the allegation, how it was followed up, investigated, resolved and what, if any, action was taken. The record will be maintained on the member of staff's personal file for the duration of their employment with Transform Trade, even where it was determined there was no case to answer.

Managers have a particular responsibility in maintaining the confidentiality of these records and must ensure that their records, or any information they contain, are made available only to relevant parties.

## **6. Monitoring**

The Transform Trade Boards will be provided with an annual report to allow them to verify the effectiveness of this policy and which includes:

- Data regarding any incidents, allegations or investigations
- Where appropriate, a summary of actions undertaken
- Summary data relating to Safeguarding training provided.

**Transform Trade reserves the right to vary the terms of the policy if the needs of the organisation change, or other circumstances deem it necessary.**

## **ANNEX 1: ROLES THAT REQUIRE A DBS (OR LOCAL EQUIVALENT) CHECK**

The Protection of Freedoms Act 2012 has reduced the number of positions requiring checks by amending the scope of regulated activity in relation to vulnerable individuals to exclude many of those whose work is of an occasional or temporary nature.

Statutory Guidance detailing what constitutes regulated activity can be found via the [Department for Education Website](#) [DBS website](#).

Transform Trade roles which will require a DBS or Local Equivalent Check are:

- NO CURRENT ROLES HAVE BEEN IDENTIFIED.

## ANNEX 2: SAFEGUARDING CODE OF CONDUCT

The Code of Conduct should be interpreted in a spirit of transparency and common sense, with the best interests of the vulnerable individual as the primary consideration. Staff must familiarise themselves with the local norms around physical contact between vulnerable individuals and others.

### Minimising risk situations:

- **Try to:** avoid placing yourself in a compromising or vulnerable position; be accompanied by a second adult whenever possible; meet with a vulnerable individual in a central, public location whenever possible; immediately note the circumstances of any situation which occurs which may be subject to misinterpretation; keep in mind that actions, no matter how well intended, can always be subject to misinterpretation by a third party.
- **Try not to** be alone with a single child or vulnerable individual, including in the following situations; in a car (no matter how short the journey); overnight (no matter where the accommodation); in your home or the home of a vulnerable individual. Do not show favouritism or spend excessive amounts of time with just one individual.

### Sexual behaviour:

- **Do not:** engage in sexual intercourse with vulnerable individuals; allow sexually provocative games or conversations (face to face or otherwise) with vulnerable individuals to take place; kiss, hug, fondle, rub or touch a vulnerable individual in an inappropriate or culturally insensitive way; sleep in the same bed as a vulnerable individual; do things of a personal nature that an individual could do for him/herself, including bathing, dressing and grooming and do not encourage any crushes by a vulnerable individual.

### Physical behaviour:

- **Do not: initiate any physical contact.**
- **Try not to** engage in any physical contact, even if initiated by the vulnerable individual. If a situation necessitates, e.g. shaking hands in greeting, holding hands, wait for this to be initiated by the vulnerable individual.

### Psychosocial behaviour:

- **Do:** be aware of the power balance between an adult and a vulnerable individual (child or adult), and avoid taking any advantage this may provide.
- **Do not:** use language that will mentally or emotional harm; suggest inappropriate behaviour or relations of any kind; act in any way that intends to embarrass, shame, humiliate, or degrade; encourage any inappropriate attention-seeking behaviour, such as tantrums; show discrimination of race, culture, age, gender, disability, religion, sexuality, or political persuasion.

### Peer abuse:

- **Do:** be aware of the potential for peer abuse; develop special measures/supervision to protect younger and especially vulnerable children and vulnerable adults; avoid placing children and vulnerable adults in high-risk peer situations (for example unsupervised mixing of older and younger children and vulnerable adults).



- **Do not:** allow children and vulnerable adults to engage in sexually provocative games with each other.

**Physical environment:**

- **Do:** develop clear rules to address specific physical safety issues relative to the local physical environment of a project (for example for projects based near water, heavy road traffic, railway lines).

**STATEMENT OF COMMITMENT**

I [INSERT NAME] have read and understood the standards and guidelines outlined in Transform Trade’s Safeguarding Policy and Code of Conduct.

I agree with the principles contained therein, accept the importance of implementing safeguarding policies and practices and abiding by the Safeguarding Code of Conduct while working for Transform Trade.

.....  
**(Print Name)**

.....  
**(Job Title)**

.....  
**(Signature)**

.....  
**(Date)**

## ANNEX 3: CONTACT DETAILS

### Internal:

Internal: Safeguarding Responsibility	Name	Job Title	Contact Email
Organisational Designated Individual		Senior HR and Operations Manager	
Organisational Designated Individual (Exec & Board Level)		CEO	
Bangladesh Designated Individual		Country Director, Bangladesh	
India Designated Individual		Business Head, India	
East Africa Designated Individual		Finance and Administration Manager	
Safeguarding Inbox		Monitored by designated individuals only	<a href="mailto:safeguarding@traidcraft.org">safeguarding@traidcraft.org</a>

### External:

Organisation / Individual	When to contact	Contact Information
Charity Commission, UK	If you're unhappy about how the charity deals with your complaint.	<a href="https://www.gov.uk/complain-about-charity">https://www.gov.uk/complain-about-charity</a> Main Switchboard: 0844 248 2658
	If you need to make a serious complaint that a charity is harming individuals:	<a href="https://forms.charitycommission.gov.uk/raising-concerns/">https://forms.charitycommission.gov.uk/raising-concerns/</a> Main Switchboard: 0844 248 2658
DBS	Referrals should be made to DBS when an employer or organisation believes a person has caused harm or poses a future risk of harm to vulnerable groups, including children	<a href="https://www.gov.uk/government/collections/dbs-referrals-guidance--2">https://www.gov.uk/government/collections/dbs-referrals-guidance--2</a>
UK Police	If you suspect illegal activity, but there is not an immediate risk of harm	Call 101
	In an emergency	Call 999
Institutional Donors		Necessary contact information to be provided by project lead.