

Paper Airplanes Adult Safeguarding Policy

EIN 81-4278267

<https://www.paper-airplanes.org/>

1. Purpose

The purpose of this policy statement is:

- to protect adults accessing Paper Airplanes' (PA) programmes from any harm as a result of PA services.
- Support 'adults at risk' who use PA's programmes to make their own informed safeguarding decisions where appropriate and act in the necessary ways when an adult is not able to protect themselves.
- to provide all PA personnel, as well as PA students, with the overarching principles that guide our approach to adult protection and the procedures put in place to fulfill our commitment to adult safeguarding.

2. Scope

This policy applies to anyone working on behalf of PA, including senior managers and the board of directors, paid staff, volunteers, and students (this policy refers to them as 'PA personnel').

3. Policy Statement

Our mission statement: *"to bridge gaps in language, higher education, and professional skills training for conflict-affected individuals. By harnessing virtual learning technology and the benefits of peer-to-peer connections, we seek to provide a means of pursuing educational and employment opportunities."*

PA works across many different countries with conflict-affected individuals, providing one-to-one online lessons. PA currently has six programmes: Youth Exchange, English, Turkish, Women in Tech, Citizen Journalism and Student Advising. This policy applies currently to the English, Turkish, Women in Tech, Citizen Journalism and Student Advising programmes.

We will not tolerate abuse in any of its form and will work with the relevant authorities to prevent abuse, end abuse that is occurring and support 'adults at risk' experiencing abuse.

We understand that:

- in order to fulfill our mission, safeguarding practices must be incorporated throughout PA.
- people have the right to make their own informed safeguarding decisions as adults.
- information empowers people in all stages of a safeguarding issue and PA will work to provide information on relevant services for PA students in the relevant local languages.

We recognize:

- all individuals, regardless of race, sexuality, gender, disability, religious belief or age, have the right to live their lives free from abuse, with dignity and rights.

- our organizational responsibility to safeguard ‘adults at risk’ and to cultivate a culture that aims to prevent abuse in the first place.
- the ‘*Do no harm*’ principle and are committed to not inadvertently exposing any individual in contact with PA activities to additional harm or abuse.
- that our process should be as empowering as possible, giving the adult as much control and choice as possible for the actions and pace of the process.
- where it is not possible for an adult to make safeguarding decisions, PA should work in the ‘best interests’ of the individual who lacks the capacity to make the decision at that time, prioritizing the dignity, safety and well-being of the individual.
- that all PA personnel should uphold the highest standards of conduct and ethics.
- the 5 adult safeguarding principles for putting your safeguarding mechanisms into practice: survivor-centred, accessible, ‘do no harm’, impartial and just and flexible. (*BOND, 20 core elements: a toolkit to strengthen safeguarding report-handling*)
- That in order to fulfill our responsibility, collaboration with local partners ‘on the ground’ is key, particularly in conflict-affected or fragile states.

This is an international policy which establishes the minimum standards and guidelines for safeguarding adults that come into contact with PA personnel. This policy has been written and will be applied according to the following guiding documents and legal frameworks:

Guiding Documents and Legal Frameworks

- The Universal Declaration of Human Rights, 1948
- UN Convention on the Rights of Persons with Disabilities, 2010
- Minimum standards in Education: Preparedness, Response, Recovery, International Network for education in emergencies, 2012
- Minimum Operating Standards for Protection from Sexual Exploitation and Abuse
- UN General Assembly, The right to education in emergency situations: resolution/adopted by the General Assembly, 27 July 2010,
- Secretary general’s bulletin on the special measures for protection from sexual exploitation and sexual abuse, October 2003
- IASC Six Core Principles relating to sexual exploitation and abuse, Inter-Agency Standing Committee, September 2019
- The Core Humanitarian Standard on Quality and Accountability, 2014
- Inter Agency Guidelines for Case Management & Child Protection, 2014
- BOND, 20 core elements: a toolkit to strengthen safeguarding report-handling, 2019
- Contextual Safeguarding, CS Network
- Arab Charter on Human Rights, Arab League of Nations, 2004
- Department of Health No secrets: guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse. London: DH, 2000.
- Safeguarding Vulnerable Groups Act 2006
- The Care Act, 2014
- Making Safeguarding personal: A toolkit for responses, 2015
- The Data Protection Act, 2018

- The Human Rights Act 1998

Supporting documents:

- Child Safeguarding policy
- Risk assessments
- Staff Code of conduct
- Student Code of Conduct
- Service Mapping Document
- Complaints Policy

4. Designated Safeguarding Officers

Position	Named Person	Contact Details
Safeguarding Officer	Gabrielle Wimer	gabby@paper-airplanes.org C: +962 07 9017 8624 S: gabby.wimer
Child Safeguarding Officer	Rania Ahmed	rania@paper-airplanes.org

See Appendix 1 for the roles and responsibilities of the Designated Adult Safeguarding Officer.

5. Definitions

An **adult** is anyone who is 18 years old or older. *UN Convention of the Rights of the Child*

Abuse: the violation of an individual’s human and civil rights by any other person or persons. *Department of Health No secrets: guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse.*

There are many different types of abuse, see the definitions below:

(*DH No Secrets*):

- Physical abuse:** including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

- B. **Sexual abuse:** including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.
- C. **Psychological abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- D. **Financial or Material abuse:** including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- E. **Neglect and acts of omission:** including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- F. **Discriminatory abuse:** including racist, sexist, acts, acts based on a person's disability, and other forms.
- G. **Modern slavery:** Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

See Appendix 2 for signs of abuse.

Adult safeguarding: the responsibility of the organization to follow the 'Do no harm' principle and ensure their operations or programmes do not expose 'adults at risk' to further harm or exploitation. In addition to this, to follow up and respond to safeguarding concerns or disclosures from 'adults at risk' in line with international guidance and the organisation's policies. (based of BOND definition)

According to U.K. legislation an '**adult at risk**' is an individual "who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation". *The 1997 Consultation Paper Who decides?, issued by the Lord Chancellor's Department*

In this policy document we use the term 'adult at risk' to recognize that it is circumstance, rather than characteristic of an individual that puts them at risk as terminology such as 'vulnerable adult' suggests. However, we also apply legislation for 'vulnerable adults' to 'adults at risk'.

There is not a universal definition of 'adult at risk' or 'vulnerable adult'. According to British legislation, being a conflict-affected individual does not necessarily mean that they are considered 'at risk'.

However, PA believes that someone who has been forced to flee their home may be less likely able to protect themselves from harm due to a variety of factors, for example lack of support network, unfamiliarity with the health and police authorities, cultural adjustments or previous traumatic experiences. An individual currently residing in a conflict-affected country is also less likely able to protect themselves potentially due to weak health and police authorities, political instability or traumatic experiences.

PA uses the Inter Agency definition of **vulnerability**: “physical, social, economic and environmental factors that increase susceptibility of a community or individuals to difficulties or hazards that put them at risk as a result of loss, damage, insecurity, suffering and death.” *Inter Agency Guidelines for case management and child protection*

We use the above definition of vulnerability to define an **adult at risk** as “someone over the age of 18 who, for physical, social, economic, environmental factors that increase susceptibility of a community or individuals to difficulties or hazards that put them at risk as a result of loss, damage, insecurity, suffering and death.”

We recognise the extent the individual is ‘at risk’ depends on circumstance and this will be taken into account when dealing with a safeguarding concern. Some people may be more ‘at risk’ than others, which is often due to power imbalance or intersections of vulnerability.

Relevant vulnerability factors include:

- Socio-economic background
- Poverty
- Natural disaster
- Mental health
- Physical/intellectual disability
- Gender
- Sexuality
- Migration status
- Religion
- Ethnic background

We recognize there is a power imbalance between PA personnel and PA students. We try to identify and minimise safeguarding issues for ‘adults at risk’ through risk assessments, a culture of listening and sharing information on relevant services (legal, health and safety) to PA students.

6. Best practice on how to respond if an adult at risk discloses to you

- Respond in a calm manner, try not to appear shocked.
- Allow them to talk without interruption and do not ask leading questions, use the TED approach (Tell me what happened, explain or describe).

- Treat the comments seriously and provide reassurance that they were right to tell you and you believe them.
- Be aware of potential misunderstandings or use of different terminology because of language or cultural differences.
- Ask their permission to share the concern/disclosure with the Designated Safeguarding Officer. Confidentiality is important and information should only be shared with consent wherever possible.
- However, you should not promise to keep it a secret. **Sharing information is necessary if another person is at risk of harm, local legislation requires you to do so, and/or the adult is not capable of making the decision themselves.** In these cases the confidentiality principle is overridden.
- Information should only be shared on a 'need to know' basis and in the '**best-interests**' of the individual.
- Let them know what will happen next and why. Reassure them that they will be in control of the decision making process as much as possible.
- Make a full record of what you remember has been said, heard and seen and immediately (using the Incident Report Form provided in Appendix 4). If possible, listen whilst the individual is speaking and write down your report immediately after. It is important to record exactly what the individual said and the time of disclosure.
- Avoid delay and contact the Designated Safeguarding Officer to discuss the matter. Do not discuss the matter with anyone else.
- If you have a concern about suspected abuse or neglect has not been explicitly disclosed:
 - Make a full record of what you remember has been said, heard and seen.
 - Do not seek to investigate the concern yourself but report your concerns to the Designated Safeguarding Officer immediately (at most within 24 hours).

7. Procedure if abuse is suspected/disclosed

a) First steps:

- Immediately inform the Designated Safeguarding Officer, in a confidential manner.
- Complete the Incident Report form in Appendix 4 with basic information, dates and times and give to the Designated Safeguarding Officer.
- The Designated Safeguarding Officer will notify the Executive Director and liaise with the Managing Director to investigate and respond to the safeguarding issue.
- The needs of the adult at risk for protection and support will be assessed and a fact-finding process will take place.
- The sociocultural norms in the location where the individual resides will be taken into account and each case will be contextualised.
- In all cases, the individual will be given the necessary information on relevant services, advice and support throughout the process.
- Use the flowchart found in Appendix 3 to aid the decision-making process.

b) The individual is in immediate danger:

- Where the individual concerned is in **immediate danger**, contact the emergency services or other relevant services in the state.
- Factors to be taking into account when considering an intervention (*No secrets Act*):
 - the vulnerability of the individual;
 - the nature and extent of the abuse;
 - the length of time it has been occurring;
 - the impact on the individual; and
 - the risk of repeated or increasingly serious acts involving this or other vulnerable adults.
- If it is deemed that the **authorities do not have the capacity to provide protection or reporting to the authorities may put the individual in question at further risk**, PA will inform partners 'on the ground' and services in other sectors in that state. The relationship and reporting procedure will be established and understood by all parties. The Designated Adult Safeguarding Officer can use the Service Mapping document to indicate the partners and organizations 'on the ground' for PA to contact.
- The decisions should be taken **case-by-case** and the reporting process, whether to the official authorities or to services in other sectors 'on the ground', needs to be done with the aim of not putting the individual in danger or made vulnerable by the very action of reporting harm or abuse.

c) The individual is not in immediate danger:

- Where the individual concerned is not in immediate danger, talk to them about the safeguarding issue and attempt to make a plan of action. The individual is the decision maker and PA will act as a support person. Each case is guided by the individual's particular needs and circumstances.
 - Preeminence should be given to the individual's understanding of the facts and their words should be used.
 - The individual should be believed.
 - It should be discovered what the person wants.
 - The assessment should be a joint activity between the person and Designated Safeguarding officer. A mutual agreement on assessment should be agreed.
- Where the individual concerned is unable to make decisions for themselves, PA will act in their best interests to promote their dignity and well-being. However, PA will always aim to enable a person to participate in the decision making process to the greatest extent possible, reflecting their wishes and feelings throughout the process. The presumption of capacity is always in favor of the person who will be affected by the decision. (*Making Safeguarding Personal*)
- If there is a language barrier between PA and the individual, the ability of the individual to make decisions with the support of PA is limited. PA will use translations to try to provide support to the individual and will provide information about local services in the individual's language.
- All investigations are confidential. All actions taken are written up by the Designated Safeguarding officer and reports are confidentiality stored.

d) Safeguarding issue relating to PA personnel:

- Where the safeguarding issue is an internal concern, relating to PA activities or personnel, and does not violate national or international law then PA's internal safeguarding procedures will apply and the individual in question may face disciplinary action and the individual will be given support.
- Where the safeguarding issue is an internal concern, relating to PA activities or personnel, and does violate national or international law then the PA personnel in question may:
 - face disciplinary action by PA.
 - be suspended from PA or working with children or 'adults at risk'.
 - be reported to local authorities for further investigation.
 - face criminal investigation in the state they reside in.
 - be referred to the Disclosure and Barring service (DBS) about the incident by PA if they are British.
 - reported to partners 'on the ground', if deemed necessary.
- The decision to report to the authorities should be:
 - based on the wishes of survivors.
 - informed by any formal or informal binding legislation, including mandatory reporting requirements.
 - informed by a risk assessment covering all parties to an incident.
 - done on a case-by-case basis.
 - discussed with and be agreed upon by members of the senior management team.

(BOND 20 core elements: a toolkit to strengthen safeguarding report-handling)

8. Allegations against staff or volunteers/Whistleblowing procedures

- PA has a zero-tolerance policy for any conduct that is exploitative or abusive. Violation of this policy can be grounds for disciplinary action. For alleged abuse that may also constitute criminal conduct, the accused may be subject to criminal prosecution.
- Any concerns for the welfare or safety of an adult, particularly 'adults at risk', from a member of staff or volunteer need to be reported immediately. Any behavior that seems inappropriate should be reported to their direct supervisor immediately.
- If a member of staff reports on another member of staff for concerns of abuse of an adult, the whistleblower will be supported as necessary. It is important to reassure the individual that, if the report was done in good faith, no negative action will be taken against them.
- Any allegation by an 'adult at risk' must be taken seriously, responded to swiftly and referred to the Designated Safeguarding Officer. PA offers an anonymous whistleblowing mechanism available for students.
- All discussions will be recorded in writing by the direct supervisor and a plan of action subsequently put in place.
- If there is alleged abuse, the relevant Programme Manager, Managing Director, Executive Director and Designated Safeguarding Officers will need to reconsider the individual's contact with children and 'adults at risk' at PA.

- The individual who has been accused will receive the necessary support. If the individual is asked to take leave from their duties at PA during the investigation, this suspension does not imply guilt but protects all parties while the investigation is undertaken.
- Every effort should be maintained to keep confidentiality for all individuals involved, particularly whilst the case is still being investigated.
- After the results of the investigation, PA may wish to take disciplinary action against the staff member. If the investigation results in the termination of the individual's involvement at PA or contact with children and adults at risk PA will need to:
 - Report the individual to DBS, if the individual is British.
 - Report to the relevant authorities.

9. Prevention-Recruitment

- All PA personnel will be familiar with and sign PA's Staff Code of Conduct. All PA personnel are fully aware of the repercussions of failure to comply with the Staff Code of Conduct.
- All PA students will also be familiar with and sign PA's Student Code of Conduct. All PA students are fully aware of the repercussions of failure to comply with the Student Code of Conduct.
- Safeguarding requirements are clearly indicated in the job description. All PA personnel have clear role descriptions and the reporting structure is understood.
- As stated in the definition section, it is not clear if all PA students fit in the British DBS category of an 'adult at risk'. However, it is possible they do fulfill this definition, for example having a mental health issue or physical disability. Their conflict-affected circumstances means there is an increased likelihood of this and overall increased vulnerability. The circumstances of each adult that PA works with will not be known or be expected to disclose. Therefore, PA asks all British volunteers to complete an **enhanced DBS check** under the assumption that the student could be classed at 'adult at risk'.
- PA personnel from other countries need to complete and sign a self-disclosure form.
- If appropriate during the interview the candidate will be asked safeguarding related questions to draw out their attitudes and values.

10. Prevention-Training

- All PA personnel will undergo induction safeguarding training and relevant training for working with 'adults at risk.' Regular refresher training will be available for all staff.
- Records of training provided to staff on safeguarding should be kept by the Designated Safeguarding Officer and the training provided to PA personnel will be evaluated annually and updated accordingly.

11. Communication of the Adult Safeguarding Policy

- Our policy will be publicly accessible on our website and shared with PA partners.

- The Designated Safeguarding Officer will work with the Executive Director, Managing Director and, Programme Managers to decide the best forms of communicating any safeguarding updates to PA personnel which the Programme Managers will circulate.

12. Use of Media

- PA personnel should never take inappropriate photos or films of students. All media taken should be relevant to PA work. Before taking the photo or film consent from the individual must be taken.
- Media where the location of an 'adult at risk' can be determined should never be taken and geotagging of images should be disabled.
- If students submit media (video, photos, quotes) they and their guardians (if under 18) will need to sign and submit a [media release waiver](#) to Paper Airplanes

13. Advice and Support

- PA will liaise with and seek advice from partners and experts in this field. PA will develop and maintain relationships with agencies that offer advice and training in safeguarding.
- Information of the services available in all the countries PA works in will be gathered by service mapping exercises and be accessible for each state in the Service Mapping Resources. The following services will be gathered: safety, health, mental health, and legal. Particular consideration for the countries where they lack capacity to provide these services will be given. PA will assess the environment of protection and perception of refugees in each state.
- The Designated Safeguarding Officers will receive advice and support from students, staff and experts where needed.

14. Implementation and Review

- It is mandatory that the Paper Airplanes Code of Conduct, be read and signed by all PA personnel.
- PA will carry out risk assessments for each of the programmes annually and review the Service Mapping Document annually also. These risk assessments will inform the policies and procedures.
- This policy will be reviewed at least once every three years using a self-auditing tool. Where possible PA will use an external auditor to review the policies.
- Wherever possible, PA will ask for feedback and advice from current and past students on safeguarding.

This policy was agreed on:

5 July 2020

This policy will be reviewed on:

5 July 2021

Signed by:

Gabrielle Wimer | Managing Director

A handwritten signature in black ink, reading "Gabrielle Wimer". The signature is written in a cursive, flowing style.

Appendix 1: Designated Safeguarding Officer- Role and Responsibilities:

The Adult Safeguarding Officer will complete the necessary training on safeguarding and adult protection and will refresh their training regularly.

Responsibility:

- Act as a source of support, advice and expertise for staff on all safeguarding issues.
- Liaise with the Health and Social Services or other organizations deemed necessary if a concern about an adult or a case arises, making the necessary referrals.
- Coordinate and manage all safeguarding issues.

Role:

- Act as a point of contact with any external partners on safeguarding issues.
- Liaise with the Executive Director and Managing Director to investigate and respond to a concern.
- Ensure each member of staff has access to and understands the relevant data protection legislation and regulations and PA's adult protection policy and procedures, especially new and part time staff.
- Understand the importance of information sharing, within the organization and with any safeguarding partners.
- Able to keep detailed, accurate, secure written records of concerns and referrals.
- Have the relevant information available about services from other sectors.
- Support and advise an individual during a safeguarding issue and make a protection plan together.
- Encourage a person-centred culture of curiosity, scrutiny and listening.
- Ensure the organization's policies, procedures and training are reviewed regularly and publicly available.

Appendix 2: Signs of Abuse (from NHS)

Physical abuse:

- History of unexplained falls or injuries
 - Unexplained marks
 - Bruising of varying ages
 - Unexplained burns
- Changes in the individual's behaviour

Sexual abuse:

- Change in sexual behaviour
- Over or inappropriate sexualised behaviour
- Unusual difficulty walking or sitting
- Pain to the abdominal, genital or anal areas
- Sexually transmitted diseases
- Recurrent urinary tract infections
- Pregnancy

Psychological abuse:

- Appearing very withdrawn, tearful agitated
- Being anxious
- Lacking confidence or presenting with low self esteem
- There may be evidence of self abuse

Financial abuse:

- Unexplained withdrawals from bank or building society accounts
- Reluctance to pay for goods and services from the person in control of the funds
- Items from the home disappear
- Bills not being paid
- Unexplained disappearance of financial documents

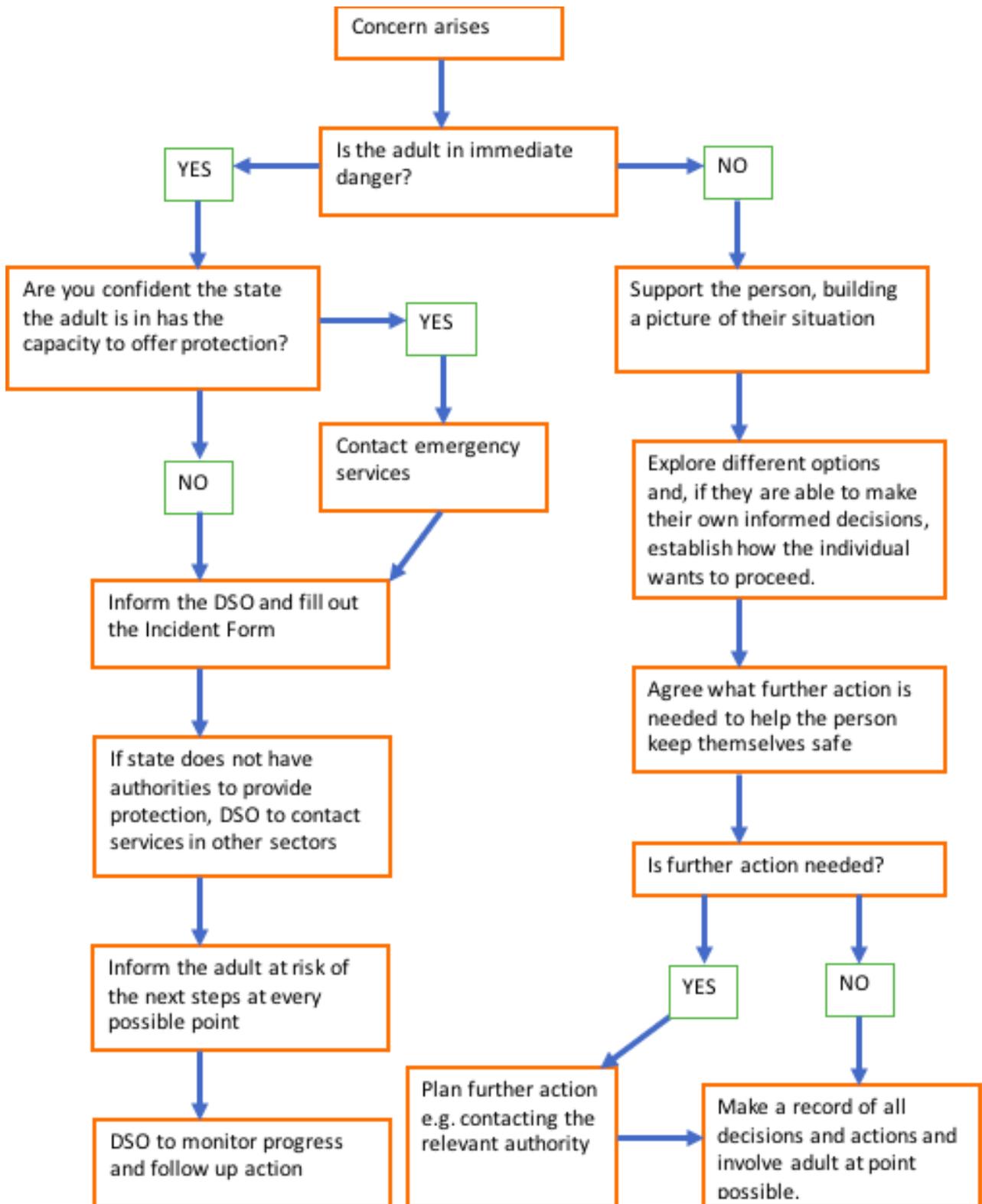
Neglect:

- A poor physical condition
- Unexplained weight loss
- Poor hygiene
- Lack of food and heating
- An unkempt appearance

Discriminatory abuse:

- A change in an individual's behaviour such as being withdrawn, anxious and/or fearful.
- There may be a tendency to isolate themselves and a reluctance to go out.

Appendix 3: Flowchart for adult safeguarding procedure



Appendix 4: Safeguarding Incident Form

Name of person making the report:	Email:
Name of adult:	Date:
Details of the disclosure/concern:	
Please indicate: Are you recording... <ul style="list-style-type: none">- A disclosure made directly to you by the adult?- A disclosure or concerns from a third party?- Your own concerns?	
If you are reporting a disclosure or concern from a third party, please provide their contact details here:	
Date and time of the disclosure:	
Date and time of the incident:	
Details of the incident or concerns. Include time/date of incident.	

Who have you spoken to about your concern? (please specify)

Direct supervisor/ PA Adult Safeguarding Officer/Any others

Action to be taken (to be completed by Safeguarding Officer)

Signed:

Date: