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**Reviewed by:** Benoit Lallemand  
**Date of next review:** June 2021

**Signed off by:** Benoit Lallemand,  
Secretary General  
**Date:** 03/02/2021  
**Endorsed by the Board** of Finance  
Watch on 03/02/2021  
**Designated Safeguarding Officer**  
**(DSO):** Samuel Bossart,  
Head of Operations & Projects

# Safeguarding Policy

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## Principle statement

Finance Watch understands 'safeguarding' to mean taking all reasonable steps to prevent harm that arises from coming into contact with our staff or programmes delivered directly or through partners – particularly sexual exploitation and abuse. Safeguarding includes taking steps to protect people, especially children and adults at risk, from that harm by responding appropriately when harm does occur.

Safeguarding encompasses protecting those defined as being at risk from maltreatment, preventing impairment of their health or development, and ensures they grow up in safe circumstances. Risk assessment done by Finance Watch shows a low level of safeguarding risks as we neither directly work with children nor vulnerable adults. Nevertheless, we aim to ensure that none of our actions will be harmful either directly or indirectly for children and vulnerable adults.

All children and adults at risk – regardless of their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages, indigenous status, or migration status – shall be treated with respect and dignity, have the right to equal protection from all types of harm or abuse and must be able to live free from fear of abuse, neglect and exploitation.

The best interests of children and adults at risk shall be central in all decisions and actions relating to safeguarding, as Finance Watch will not tolerate any form of harm to children and adults at risk within its working environment.

We want to create a safe environment with clear guidelines to ensure safeguarding procedures are followed at all times and child & vulnerable adults protection measures are implemented when considered necessary. We also expect all our stakeholders to abide by these or similar safeguarding principles.

Overall responsibility for Child and Vulnerable Adults Safeguarding at Finance Watch is held by the Designated Safeguarding Officer (DSO).

## Aims and scope

The policy aims to:

- provide protection for children and young people that could be affected by Finance Watch's actions
- provide staff with guidance on procedures that they should adopt in the event that they suspect a child or vulnerable adult may be experiencing harm, or be at risk of harm.

The policy applies to all staff, including Finance Watch interns, members of its Board of Directors, consultants engaged and members.

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### Objectives

Finance Watch will seek to safeguard children and vulnerable adults by:

- Valuing, listening to and respecting them;
- Adopting child & vulnerable adults' protection guidelines through procedures and a code of conduct for staff and members;
- Recruiting staff safely, ensuring all necessary checks are made;
- Sharing information about child protection and good practice with staff and members;
- Sharing information about concerns with agencies who need to know; and
- Providing effective management for staff through supervision, support and training.

### Roles and duties

Finance Watch defines children and adults at risk as:

- Children under the age of 18, irrespective of the age of adulthood in the country where they live;
- Persons over the age of 18 who, for any reason Finance Watch – for example their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages, indigenous status, or migration status – may be more likely to be adversely affected by a Finance Watch project, or may be unable to protect themselves from significant harm or exploitation.

Safeguarding children and vulnerable adults is the responsibility of everyone.

When children or vulnerable adults are involved in organised activities and are to any extent under the care and/or control of one or more adults, the adult(s) have a duty of care to ensure their safety and welfare.

All staff, including managers, members of the Board of Directors, consultants and members of Finance Watch have a duty to promote the welfare and safety of children and vulnerable adults.

Staff, members of the Board of Directors, consultants and members of Finance Watch may receive disclosures of abuse and/or observe children or vulnerable adults who display the behaviours we identify with being at risk of abuse. This policy will enable any staff member, member of the Board of Directors, consultants or member of Finance Watch to make informed and confident responses to specific child protection issues.

All child and vulnerable adults' protection concerns should be acted upon **immediately**. Any person concerned that a child or a vulnerable adult might be at risk or is actually suffering abuse should tell the Designated Safeguarding Officer (DSO). It is the responsibility of the DSO to make him/herself available for consultation by staff members, members of the Board of Directors, consultants and members of Finance Watch, children and their families.

In the event of the DSO being unavailable, any concerns should be brought to the attention of the Secretary General of Finance Watch.

### Recognising signs of abuse

We are aware that many children and vulnerable adults are the victims of different kinds of abuse and that they can be subjected to social factors that have an adverse impact upon their lives.

It often can be difficult to recognise abuse. The signs listed in these guidelines are only indicators and many can have reasonable explanations. Children and vulnerable adults may behave strangely or seem unhappy for many reasons, as they move through the stages of childhood or their families experience changes. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further.

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Someone can abuse a child or a vulnerable adult by actively inflicting harm or by failing to act to prevent harm leading to neglect. Abuse can take place within a family, in an institutional or community setting, by telephone or on the Internet. Someone known to a child or a vulnerable adult or a complete stranger can carry out abuse.

If you are worried about a child or about a vulnerable adult it is important that you keep a written record of any physical or behavioural signs and symptoms and notify the DSO at the earliest opportunity. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

### Physical Abuse

Physical abuse can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, and suffocating. It can also result when a parent or carer deliberately causes the ill health of a child or a vulnerable adult in order to seek attention; this is called fabricated illness, or Munchhausen's Syndrome by Proxy.

Symptoms that indicate physical abuse include:

- Bruising in or around the mouth, on the back, buttocks or rectal area
- Finger mark bruising or grasp marks on the limbs or chest of a small child
- Bites
- Burn and scald marks; small round burns that could be caused by a cigarette
- Fractures to arms, legs or ribs in a small child
- Large numbers of scars of different sizes or ages

### Emotional Abuse

Emotional abuse happens when a child's or vulnerable adult's need for love, security, praise and recognition is not met. It usually co-exists with other forms of abuse.

Emotionally abusive behaviour occurs if a parent, carer or authority figure is consistently hostile, rejecting, threatening or undermining. It can also result when children and vulnerable adults are prevented from social contact with others, or if developmentally inappropriate expectations are imposed upon them. It may involve seeing or hearing the ill-treatment of someone else.

Symptoms that indicate emotional abuse include:

- Excessively clingy or attention-seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness; a 'frozen watchfulness'
- Despondency
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

### Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, causing damage to their health and development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a child or a vulnerable adult from harm or danger, or failing to access appropriate medical care and treatment when necessary. It can exist in isolation or in combination with other forms of abuse.

Symptoms of physical and emotional neglect can include:

- Inadequate supervision; being left alone for long periods of time
- Lack of stimulation, social contact or education

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- Inadequate nutrition, leading to ill-health
- Constant hunger; stealing or gorging food
- Failure to seek or to follow medical advice such that a child's life or development is endangered
- Inappropriate clothing for conditions

## Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. This may include physical contact, both penetrative and non-penetrative, or involve no contact, such as watching sexual activities or looking at pornographic material. Encouraging children or vulnerable adults to act in sexually inappropriate ways is also abusive. The age under which any sexual activity – contact or non-contact – with a child is a crime varies per country.

Symptoms of sexual abuse include:

- Allegations or disclosure
- Genital soreness, injuries or discomfort
- Sexually transmitted diseases; urinary infections
- Excessive preoccupation with sexual matters; inappropriately sexualized play, words or drawing
- A child who is sexually provocative or seductive with adults
- Repeated sleep disturbances through nightmares and/or wetting

Older children and young people may additionally exhibit:

- Depression
- Drug and/or alcohol abuse
- Eating disorders; obsessive behaviours
- Self-mutilation; suicide attempts
- School/peer/relationship problems

Some members of our network hold beliefs that may be common within particular cultures but which are against the law. Finance Watch does not condone practices that are illegal or harmful to children or vulnerable adults. Examples of particular practices are:

- Forced Marriages. No faith supports the idea of forcing someone to marry without their consent. This should not be confused with arranged marriages between consenting adults.
- Under-age Marriages.
- Female Genital Mutilation (FGM). This is against the law yet we know that for some in our communities it is considered a religious act and a cultural requirement. It is also illegal for someone to arrange for a child to go abroad with the intention of having her circumcised.
- Ritualistic Abuse. Some faiths believe that spirits and demons can possess people (including children or vulnerable adults). What should never be condoned is the use of any physical violence to get rid of the possessing spirit. This is abuse and people can be prosecuted even if it was their intention to help the child or vulnerable adult.

### Procedure in the event of an allegation/disclosure

All complaints, allegations or suspicions will be taken seriously.

This procedure must be followed whenever an incident regarding safeguarding is suspected, observed or reported, including disclosures made by young people.

Finance Watch commits to report any violations of local laws to the relevant authorities.

It is important to remember that the person who first reports an incident/suspicion/disclosure is not responsible for deciding whether abuse has occurred. This is a task for the professional child protection agencies, following a referral from the DSO.

### Responding to an allegation/disclosure

In the event of an incident or disclosure:

#### **DO**

- Make sure the individual is safe;
- Assess whether emergency services are required and if needed call them;
- Take precautions to preserve forensic evidence, if necessary;
- Speak to your manager for support and guidance;
- Inform parents/carers if appropriate, and if this does not put the young person involved at increased risk;
- Listen;
- Offer support and reassurance;
- Ascertain and establish the basic facts, recording them as outlined below;
- Explain areas of confidentiality; and
- Explain the reporting process to the person making the allegation;
- Remember the need for ongoing support.

#### **DON'T**

- Ignore the allegation – if you are unsure what to do consult the DSO or refer to this policy;
- Confront the alleged abuser;
- Be judgmental, dismissive or voice your own opinion;
- Investigate or interview beyond that which is necessary to establish the basic facts;
- Ask leading questions, assume information or elaborate in your notes; and
- Make promises.

Remember confidentiality – all information must be recorded and stored in accordance with the Data Protection Policy. Information is shared on a 'need to know' basis.

A full record must be made as soon as possible (on the same working day) detailing the nature of the allegation/incident/suspicion and any other relevant information.

This **incident report** must include:

- the date, the time, the place where the incident/alleged incident happened;
- your name and the names of any others present;
- the name of the complainant and, where different, the name of the young person;
- the nature of the alleged incident;
- a description of any injuries observed; and
- the account of the allegation/incident, making careful notes, in the exact words of the person making the allegation, and obtain agreement on them.

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Please note it is important to quickly and accurately record the incident/allegation.

Any suspicion, allegation or incident regarding safeguarding must be reported to the DSO on the same working day where possible.

If the DSO is unavailable, contact the Secretary General.

If you believe the child or young person to be in immediate danger, contact the appropriate local agencies yourself.

### **Allegations made against staff**

Organisations need to be aware of the possibility that allegations may be made against members of their staff. Allegations will usually be that some kind of abuse or inappropriate behaviour has taken place.

Finance Watch is less concerned by this particular issue, as its staff does not work with direct beneficiaries or with vulnerable adults or children. Nevertheless, Finance Watch seeks to minimise the risk of this happening by following safe recruitment guidelines for all staff, and ensuring all staff are aware via their induction, training and on the job supervision of safeguarding issues and how to behave professionally and appropriately while at work.

Where an allegation or complaint is made by one staff member against another, Finance Watch will apply a 'whistle-blowing' framework protection.

Every individual in the workplace is protected from victimisation where they raise genuine concerns about malpractice.

In the event of an allegation being made, it should be brought to the notice of the DSO immediately. (in cases where the allegation is made against the DSO, the complainant should approach the Chair of the Board of Directors).

The procedure is initially the same as outlined above in regards to recording and reporting the allegation/incident/suspicion.

Once an incident has been reported, irrespective of any investigation by the police, Finance Watch will do the following:

- Follow the procedure outlined in the Working Rules. Where necessary the alleged abuser will be suspended from work until the outcome of any investigation is clear.
- The DSO must consider whether the person has access to children or vulnerable adults anywhere else and whether those organisations or groups need to be informed. Be aware that confidentiality and privacy shall be maintained at all stages of the process.
- All incidents should be investigated internally after any external investigation has finished, to review organisational practice and put in place any additional measures to prevent a similar-type incident happening again.

### **Safe recruitment**

The application of rigorous procedures for the recruitment of any staff who come into contact with children and young people, both directly and indirectly, can reduce the likelihood of safeguarding issues. As said, this is less the case at Finance Watch, as its staff does not work with direct beneficiaries or with vulnerable adults or children.

Finance Watch uses the following procedures for the recruitment of staff.

#### **Recruitment: paid work – external applicants**

- Clear person specifications and job descriptions are created for each role;
- All posts are advertised;

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- An information pack about the job is sent to any interested parties;
- Shortlisted candidates are invited to face-to-face interviews conducted by a small panel of interviewers; and
- Finance Watch is working towards introducing a transparent scoring system for shortlisting and interviewing.

### Recruitment: paid work – internal applicants

It happens that participants are invited to interview for available roles without these roles being externally advertised. They are not shortlisted and will have already ascertained that they have the suitable skills and characteristics for the role. These applicants will attend an interview.

### Successful Applicants

Finance Watch will make sure all successful applicants who are offered a position will have:

- A formal induction meeting where they are made aware of policies and processes;
- An agreed job description; and
- A proof of identity.

### Good practice

The DSO must refresh regularly his/her knowledge on safeguarding issues. He/she trains also the staff on a regular basis, at least once a year.

The Board of Directors receives regularly updates on safeguarding risks, at least once a year, and each time an incident is reported.

### Contacts

Designated Safeguarding  
Officer  
[samuel.bossart@finance-watch.org](mailto:samuel.bossart@finance-watch.org)

Chair of the Board of Directors  
[Chair@finance-watch.org](mailto:Chair@finance-watch.org)  
0032 2 880 04 46

Child Focus Belgium  
<https://childfocus.be/fr>  
In an emergency dial 112

## About Finance Watch

Finance Watch is an independently funded public interest association dedicated to making finance work for the good of society. Its mission is to strengthen the voice of society in the reform of financial regulation by conducting advocacy and presenting public interest arguments to lawmakers and the public. Finance Watch's members include consumer groups, housing associations, trade unions, NGOs, financial experts, academics and other civil society groups that collectively represent a large number of European citizens. Finance Watch's founding principles state that finance is essential for society in bringing capital to productive use in a transparent and sustainable manner, but that the legitimate pursuit of private interests by the financial industry should not be conducted to the detriment of society. For further information, see [www.finance-watch.org](http://www.finance-watch.org)



**Finance Watch**

Finance Watch  
Rue Ducale 67 b3  
1000 Bruxelles  
T: + 32 (0)2 880 0430  
[contact@finance-watch.org](mailto:contact@finance-watch.org)

[www.finance-watch.org](http://www.finance-watch.org)