

THE ROLL BACK ANTIMICROBIAL RESISTANCE INITIATIVE SAFEGUARDING POLICY

1. Principles and Commitments

The Roll Back Antimicrobial Resistance Initiative (RBA Initiative) maintains safeguarding is at the heart of its vision, mission, and values. RBA Initiative considers that it is unacceptable for anyone, young or older, to experience abuse or exploitation and that safeguarding children, young people and adults at risk and protecting them from harm is everyone's responsibility. It looks to all those it works with to share this commitment and align to these Safeguarding principles.

RBA Initiative fosters a culture of Safeguarding where everyone feels comfortable to challenge behaviour that does not align with this or other RBA Initiative policies and to report concerns. RBA Initiative is committed to preventing and responding to harm of those we intend to assist.

This Safeguarding Policy document sets out RBA Initiative's approach to preventing, reporting, and responding to safeguarding incidents. Key procedures are detailed in annex to the Policy. The principles in this Policy have been drawn from key international and regional instruments such as the International Standards for Keeping Children Safe and the UN Convention on the Rights of the Child (1989). RBA Initiative is a registered Non-Governmental Organization in Tanzania and is, as such, required to comply with the laws of the United Republic of Tanzania.

2. Who is protected under this Policy?

While everyone without exception has the right to protection from abuse regardless of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion, belief, the focus of this policy is to protect children, young people and adults at risk from harm. These categories are not mutually exclusive.

Children: the UN Convention on the Rights of the Child defines a Child as anyone under 18 years of age, irrespective of the laws and customs in their country of residence.

Young people: RBA Initiative works with young people aged 14 - 35 years of age. Young people are considered by RBA Initiative to be any individuals who are within this age range.

Adults at Risk: An adult is at risk if they require protection or may be in need of protection by reason of age, illness, mental or other disability, and/or who lives with economic dependence, a conflict environment, or cultural constraints. Being at risk can be a transient state, due to changes in environment, capacity, or resources. Risk may be temporary or more permanent and pervasive.

3. Who does this Policy apply to?

The Policy applies to:

- a) RBA Initiative Representatives: including staff, volunteers, Board members, consultants, interns, and contractors.
- b) RBA Initiative Visitors: those who visit RBA Initiative work /projects with RBA Initiative's knowledge and consent (including, but not limited to, donors, journalists, or supporters).

4. Definitions of Safeguarding and Abuse

Safeguarding is action taken to promote the welfare of children, young people and adults at risk and protect them from harm.

Abuse is when a person harms a child, young person, or adult at risk. Abuse may be perpetuated by people who know the child, young person, or adult at risk, by people in organisations that work to

support them, or by institutions. Abuse includes the actual harm done, the likely harm as a result of actions, as well as the deliberate failure to prevent harm.

Types of abuse include:

- physical abuse (hitting, shaking, burning, inducing illness, etc);
- Emotional abuse (threatening, ridiculing, degrading, humiliating, or discriminating treatment, etc.);
- bullying and cyberbullying;
- sexual abuse and exploitation including all forms of sexual activity under unequal or coercive conditions, the exchange of benefits (including food and money) for sexual favours and grooming, etc.;
- sexual harassment, which is unwanted conduct of a sexual nature;
- neglect, where basic needs physical and psychological needs are not met (not providing a safe environment, adequate supervision, etc.); and
- Commercial exploitation, including child and people trafficking.

5. Roles and Responsibilities

Safeguarding is the responsibility of all those working within and for RBA Initiative. All RBA Initiative staff have the responsibility to ensure that all RBA Initiative Representatives, visitors, partners and beneficiaries are made aware of this Safeguarding Policy. Regular safeguarding due diligence, risk assessment and risk mitigation must be incorporated into RBA Initiative's systems and processes.

The Safeguarding Lead is the Chief Executive Officer, who has overall responsibility for ensuring the implementation of this policy and to whom safeguarding concerns should be reported. The Designated Safeguarding Officer (DSO) is the RBA Initiative Project Coordinator who will deputise for the Safeguarding Lead.

The RBA Initiative Board has ultimate accountability for safeguarding. The Board must always act in the best interests of those who RBA Initiative's work is intended to support and assist. The board will appoint a designated safeguarding board member.

6. Safeguarding Code of Behaviour

RBA Initiative will look to all RBA Initiative Representatives and Visitors to observe the RBA Initiative Code of Conduct in their professional and personal behaviour, including conduct related to safeguarding. They will:

- Create and maintain an environment that prevents abuse, including sexual exploitation, sexual abuse, bullying and harassment. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment;
- treat everyone with dignity and respect;
- plan and organise events in a manner which reduces risk;
- report any concern or suspicion regarding abuse, including sexual exploitation or sexual abuse, without delay in accordance with this Safeguarding Policy;
- not engage in any type of sexual relationships with any person under the age of 18 regardless of the age of majority. Mistaken belief in the age of a child is not a defence;
- not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes any exchange of assistance that is due to beneficiaries of assistance;

- not use the organisation’s computers or other equipment to view, download, create or distribute inappropriate material, including but not limited to pornography);
- not use email, the internet or social media to bully, abuse, harass or coerce others;
- not take advantage of a position of power to enter into a relationship with a beneficiary or another member of staff;
- not use behaviour which could in any way be deemed exploitative or abusive;
- not spend time alone with children or adults at risk, away from others, in a secluded area or behind closed doors, including on car journeys unless it is absolutely necessary, and with parental or guardian consent where required; and
- not use language, make suggestions or offer advice, which is inappropriate, offensive or abusive.

7. Raising Awareness

When RBA Initiative Representatives begin working with RBA Initiative, and Visitors visit an RBA Initiative activity, they should expect to see, abide by this Safeguarding Policy. The policy will be available in English and Swahili language.

Partners, communities, and all beneficiaries and participants in RBA Initiative programs and activities should be made aware of this Safeguarding Policy, and how to report a concern. Poster or picture formats may be produced, and complaints and suggestion boxes made available to participants.

This safeguarding policy is available and can be accessed in the organization’s official website. Briefing or training regarding this policy to new staff or volunteers will be conducted.

8. Working with Children, Young People and Adults at Risk

RBA Initiative will consider safeguarding risk when organising any programme, activity, or event, during the planning, implementation, and evaluation phases. A risk assessment, using a risk assessment tool, will be done before new events or activities are undertaken. RBA Initiative will ensure appropriate safeguarding risk mitigations are in place.

Participation in all programming and events will be done with the informed consent of the children, young people and adults at risk. Information on the objectives, location, duration and content of the activity are shared before informed consent can be obtained. For children under 18 years old, informed consent from the guardian must be obtained.

9. Communications and Digital Safeguarding

RBA Initiative is committed to respecting the rights of children, young people and adults at risk featured in its online communications, the correct handling of data, and enabling a safe online environment for all users. The following principles will be upheld:

Informed Consent: RBA Initiative will only publish stories, images, audio or video where informed written consent has been received. Informed consent is sought from the child, if of an age and maturity to provide consent, and the guardian or responsible adult if the child is under 18 years. RBA Initiative will ensure individuals know how content featuring them is being used and shared, disclose any potential risks, and ensure individuals are aware of their rights so that informed consent can be given. Refusal of consent to use stories, images, audio or video should never be a barrier to participation in an RBA Initiative event or programme.

Third parties supplying content will be required to demonstrate that they have acquired consent from those featured.

Protection of users' and contributors' privacy and data: RBA Initiative protects the privacy of others and adheres to data protection laws in relation to any personally identifiable information that is collected, stored, used, or shared. When referring to children, young people and adult at risks, only first names and non-identifiable locations used to protect identities. In sensitive cases, a name can be changed to protect an individual's identity and will be footnoted with the following: "Names have been changed in order to protect the identities of those involved."

Responsible use of technology and content placement: RBA Initiative will take steps to ensure that its social media content is responsibly placed and does not appear alongside undesirable advertising content.

Trustworthy content and transparent user journeys: RBA Initiative is committed to sharing content that does not mislead viewers and is factually accurate.

Platform moderation: RBA Initiative will monitor and moderate its social media and network management platforms and report or remove harmful or offensive comments. Such content may include, but is not limited to, abuse, bullying, harassment, or impersonation of any kind. Reports will be made to the relevant social media channel and escalated to relevant authorities if appropriate.

Official communications channels: When working with children and young people connected with RBA Initiative, only official (not personal) email accounts and social media will be used.

10. Reporting and Responding to a Safeguarding Concern

The guiding principle in responding to any concerns around safeguarding is that the protection and welfare of the child, young person or adult at risk should always come first. No child, young person or adult at risk should be put at more risk by any action during an investigation of a concern or allegation.

Safeguarding incidents include concerns or allegations about an individual child, young person, or adult at risk or between beneficiaries and can be against RBA Initiative Representatives, Visitors, or beneficiaries (while participating in RBA Initiative activity/ supported work).

Whoever is notified of a safeguarding concern or incident should always take it seriously. Those making reports of concerns or an allegation about a safeguarding incident DO NOT need to decide whether abuse has taken place. They DO need to pass on at the earliest to the RBA Initiative Safeguarding contacts any information about a safeguarding incident which they identify, or which has been raised with them. No individual should attempt to deal with a safeguarding incident alone.

Safeguarding incident reports will always be acted upon and investigated swiftly. The Safeguarding Lead will ensure that the victim / survivor is kept up to date of the progress of any investigation and provided with feedback at the end of the investigations. RBA Initiative may offer support to victims and survivors in relation to safeguarding breaches in relation to work carried out by RBA Initiative Representatives. See **Annex 3** for procedure to follow to respond to a concern.

All parties must maintain confidentiality in safeguarding incidents. The sharing of information, which could identify a child, young person or adult at risk or an alleged perpetrator is on a 'need to know' basis. Any information offered in confidence to RBA Initiative may need to be shared with relevant trusted authorities, or may legitimately be shared to protect the child, young person, or adult at risk. If the individual(s) concerned, do (es) not want their case brought to the attention of the authorities, the concern must be noted and the reluctance for reporting must be communicated to the RBA Initiative Safeguarding Lead. The Safeguarding Lead will assess the related safeguarding risks in these circumstances before deciding on a course of action.

11.Safe Recruitment and Management of Staff and Volunteers

Safeguarding considerations should be considered at all stages of the recruitment and staff management processes. RBA Initiative operates strict procedures to ensure it recruits only those staff, volunteers or other representatives who are suitable to work with children, young people, and adults at risk.

11.1 Advertisement: All adverts state that RBA Initiative is an equal opportunities employer and that its recruitment and selection procedures reflect our commitment to Safeguarding.

11.2 Interview: For roles, which involve working directly with children, young people and adults at risk, the interview will include a discussion of the individual's previous work with children, young people and adults at risk, with questions designed to explore the person's approach, attitude and experience.

11.3 Recruitment checks and references: Where roles involve working directly with children, young people and adults at risk, or indirectly such as handling imagery and personal data, RBA Initiative obtains a police record check. RBA Initiative always asks for and takes up references and will stipulate in a reference if someone has been disciplined in connection with a breach of this Safeguarding Policy. Reasons for leaving previous employment will be checked with the most recent employer.

11.4 Induction: All new RBA Initiative Representatives will have a mandatory induction on joining or commencing work for RBA Initiative that covers the Code of Conduct and this Safeguarding Policy.

11.5 Training: All RBA Initiative Representatives will receive mandatory safeguarding training consistent with their job roles and responsibilities including as part of their induction, and subsequent refresher training.

11.6 Disciplinary actions: RBA Initiative will apply appropriate disciplinary measures to any staff found in breach of this and other relevant policies. During investigation, alleged perpetrators may have their duties changed or may be asked to take paid leave.

12.Monitoring and Review of this Safeguarding Policy

Safeguarding risks, statistics and updates will be reviewed and assessed every month by the RBA Initiative Senior Management Team and every six months by the RBA Initiative Board. Safeguarding is a standing item at all Board meetings. The Board will receive reports on all investigations and the outcome within the confines of confidentiality.

RBA Initiative will report annually on their safeguarding approach, practices, and experience. RBA Initiative is committed to reviewing its policy and good practice on an annual basis, or sooner if there is a change in legislation or learning from an incident. The Board has agreed this Policy and will review it regularly, and as required, to ensure it always remains fit for purpose. Board members and staff are responsible to ensure RBA Initiative complies with this Policy and for making Safeguarding a priority.

Annexes

Annex 1: [RBA Initiative contacts for reporting a Safeguarding Incident](#)

Annex 2: [Safeguarding Incident Report Form](#)

Annex 3: [Procedures upon report of a safeguarding incident](#)

Annex 4: [Consent Form](#)

Annex 1: Contacts for reporting a Safeguarding Incident.

- All Safeguarding incidents or concerns should be reported to the Safeguarding Lead via safeguarding@rbainitiative.or.tz or at +255764616008 (text or call, will be active out of office hours) and to the Safeguarding Officer via +2557660909094 or a designated safeguarding board member via +255757468795
- Having your details helps RBA Initiative to follow up but if you want to be anonymous you can submit information relating to a Safeguarding incident or concern via the following web form: <https://rbainitiative.or.tz/safeguarding>

Annex 2: Safeguarding Incident Report Form

Form for completion by RBA Initiative staff member, volunteer or other representative, or partner organisation.

If the individual concerned is in immediate danger, or needs urgent medical treatment, call emergency services

Section A – To be completed by the individual reporting the concern.

Please remember that all information in this report must be kept confidential and must not be revealed to anyone except the relevant RBA Initiative Safeguarding contact. You will be informed of the next actions which need to be taken.

Part 1 – Form completed by

Name	
Position	
Date	
Email address	
Contact number	

Part 2 – Cause for concern

Does the incident involve a RBA Initiative staff member? If so please include their name and role.	
Does the incident involve someone else? If so please include their name, role and organisation or relationship as relevant.	
Detail below an account of your concern and how it came to your attention including date, time and place of any incident(s) and anyone else who was present. REMEMBER: It is never an individual's responsibility to resolve a case. No leading question should be asked, and all reports should be factual and objective. DO NOT speak to or alert the alleged perpetrator to the fact of the report and/or concern, and if put under any pressure or difficulty, speak to the RBA Initiative Safeguarding Lead immediately.	

Part 3 – Details of victim/survivor/complainant of a safeguarding incident

Name	
------	--

Date of birth	
Gender	
Date and time of incident occurring.	
Observations of child, young person or adult's words, emotional state, any physical evidence, other relevant information.	
Were other people involved or aware?	
Have parents or carers been contacted/informed? Have other agencies been contacted/informed?	
Is the victim/ survivor/ complainant willing for it to be reported to their parent/ guardian/ carer and/or local authorities? Did the individual concerned express any further views?	
Is there anything that upon receiving or observing the disclosure or allegation you have said or done already?	

I understand that in making this report RBA Initiative may have to inform authorities, in a confidential manner and only if necessary, for the safety of the child, young person, vulnerable adult, the staff member, the partner, or to meet obligations to donors or under national law.

Signed _____

Dated _____

Section B – To be completed by the Safeguarding Lead or Safeguarding Officer

Part 1 – Action Log

Detail here all actions taken (add lines as needed)

Action	Person responsible	Timeframe	Status update (including information and date)
1.			
2.			

Part 2 – External Agencies contacted

Police (Yes/No) Name and contact number Details of any advice received	
Social Services (Yes/No) Name and contact number Details of any advice received	
Local Authority (Yes/No) Name and contact number Details of any advice received	
Parent/ Guardian/ Carer contacted? (only if appropriate)	
Other organisations contacted (add as needed) Name and contact number Details of any advice received	

Part 3 - Outcome

Was the incident reported to any statutory body? (Include details, adding lines as needed)
What are the material lessons learnt?

Annex 3: Safeguarding Incident Report Form

CONSENT FORM-RBA INITIATIVE

Before filling this form you will be given explanation about this exercise.

The information you've provided here may be used by RBA Initiative and its stakeholders, on social media and other online platforms to encourage more efforts on containing antimicrobial resistance.

I give permission to RBA Initiative to use the information and content provided.

Name and signature

Full Name

Signature.....

Date signed Mobile phone:-----

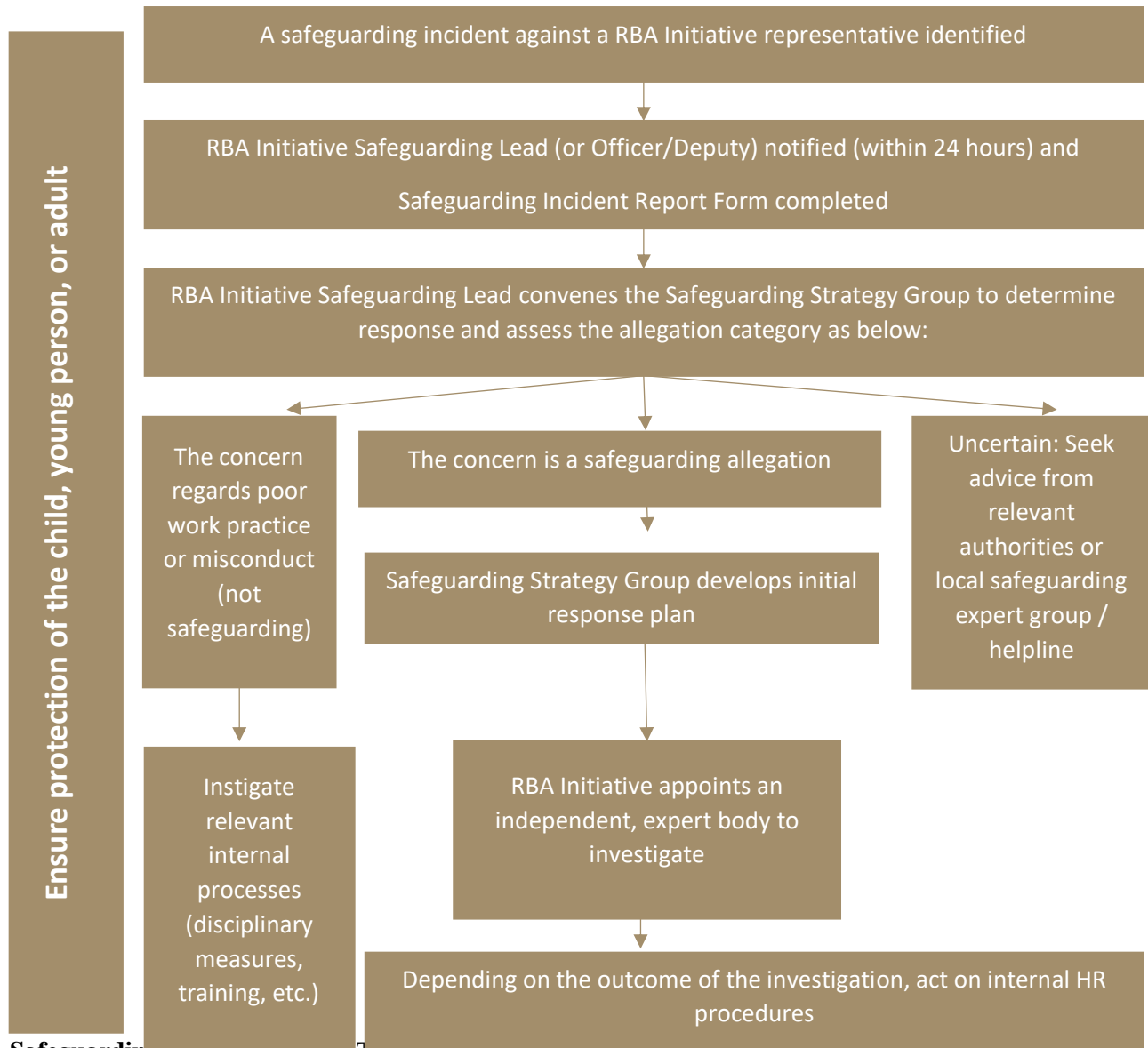
Parent/ Guardian name and signature (if under 18)

Full Name Signature.....

Mobile phone of guardian/parent-----

Annex 4: Procedures upon report of a safeguarding incident

The following allegation management process will apply in instances where there are safeguarding allegations or concerns that a RBA Initiative Representative or visitor or other partner has harmed or may have harmed a child, young person, or adult at risk.



Safeguarding Strategy Group. The Safeguarding Strategy Group meets face to face or virtually to determine the approach to manage the allegation. The members of the safeguarding strategy group as follows: Safeguarding Lead, Safeguarding Officer, Safeguarding Board member, and appointed staff member/members. The safeguarding lead can co-opt another person to participate in the meeting when it is needed.

Determining a safeguarding incident. A safeguarding incident is defined as follows if the allegations concerns a person or person(s) who:

- a) Behaved in a way that has harmed a person, may have harmed a person, or might lead to a person being harmed;
- b) Possibly committed or is planning to commit a criminal offence against a person or related to a person; or
- c) Behaved towards a person in a way that indicates s/he is or would be unsuitable to work with children, young people and/or adults.

The Safeguarding Strategy Group will assess, based on the information they have, to determine if the incident is a safeguarding incident or concerns other types of misconduct or poor practice and then follow the appropriate internal procedures to address this. All decisions and reasons for decisions, including there being no need to take safeguarding action, must be recorded and kept separate from an individual's file but cross-referenced to it.

Making an initial response plan. If it is agreed that it is a safeguarding incident, the Safeguarding Strategy Group must make an initial plan which considers the following:

- a) the immediate safety of the children, young people or adult(s) at risk involved, for example those that are the subject of the safeguarding allegation or others the individual has contact with through work or family;
- b) what information to share with the individual(s) who is the subject of the safeguarding allegation;
- c) Whether any immediate decision should be taken about suspension of the individual (either from paid work or volunteering) subject to the allegation, pending further enquiries and/or investigation. The act of suspension does not indicate a person's guilt. An individual must not be suspended automatically without careful thought. Suspension should be considered in any case where:
 - there is cause to suspect a child/young person/adult is at risk of significant harm;
 - the allegation warrants investigation by the police;
 - the allegation is serious enough be grounds for dismissal; or
 - there are concerns that the person about whom the allegations are made may put pressure on or interfere with potential witnesses;
- d) if any records need to be secured or 'locked down', or any work equipment be removed from the individual who is the subject of the allegation (e.g. laptop, mobile phone, iPad) if the concerns relate to their online behavior being abusive e.g. grooming a person with the intent to abuse or exploit them;
- e) what other information is required;
- f) identifying who else is aware of the safeguarding allegation and who has been spoken to;
- g) whether advice should be sought from the local statutory authorities (i.e. children's or adult services and police) or local safeguarding experts. If safe, the incident can be reported to the police or the children's or adult services. Where formal systems either don't operate or are inadequate or unsafe, the Safeguarding Strategy Group may have to conduct the investigation themselves or appoint an independent body to do this;
- h) arrangements to support the person who is the subject of the safeguarding allegation, the person who raised the allegation and the alleged victim(s); and
- i) a plan around the management of information both internally and externally.

Support for victims of safeguarding incidents. Upon receipt of a safeguarding incident report RBA Initiative will put in place a process to ensure that the victim / survivor is removed from harm's way, in

as far as this is reasonably possible, and will ensure that no child, young person or adult is put at more risk by any action that may be taken at any stage including during an investigation of a concern or allegation. RBA Initiative may offer support to victims and survivors, including referral to health, psychological support and legal services.

Information for the accused person(s). The Safeguarding Lead is responsible for ensuring that the person who is the subject of the allegation is:

- informed of the allegation against them (if agreed by the local authority/police), notified of the processes that will follow and signposted to support should they require it;
- and provided with feedback at the end of any investigation, clarifying the outcome and any implications for their employment or volunteering.

Outcomes of an investigation. The Safeguarding Strategy Group will need to maintain oversight over any external or internal investigations and determine the necessary actions once the outcomes of any investigation are completed.

Step 1: At the end of an investigation the following terms should be used when recording the outcome of a safeguarding allegation:

- Substantiated: there is sufficient evidence to prove the allegation
- False: there is sufficient evidence to disprove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and that there has been a deliberate act to deceive
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.

Cases in which an allegation was proven to be false, unsubstantiated, or malicious should not be included in employer references. RBA Initiative will not use a 'settlement agreement' with any person in respect of safeguarding incidents. This is where the individual subject to the allegation agrees to resign, the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in future references.

Step 2: The Safeguarding Strategy Group will formally review the outcome and determine if any further action is required by RBA Initiative. The range of options open will depend on the circumstances of the case and will need to consider the result of any police investigation or trial, any investigations in respect of the child/young person/adult victim(s), as well as the different standard of proof required in disciplinary and criminal proceedings. Options could include reintegration the RBA Initiative Representative, instigation a disciplinary process, or alerting other known employers of the individual concerned.

Step 3: If an allegation is determined to be false or malicious, the Safeguarding Lead must consider if any further action is required. Deliberate false or malicious allegations, or the leaking or misuse of confidential information whether false or not, are serious disciplinary offences and will be investigated in accordance with RBA Initiative's Disciplinary Policy.

Step 4: At the end of the process of managing an allegation, the Safeguarding Lead and Safeguarding Officer are responsible for the identification of any lessons learned. This learning may have implications for the safeguarding policy and procedures and/or training. This learning must be shared with the Lead board member for Safeguarding.

Record keeping and retention. Full records of the allegation, decisions, actions, and outcomes must be kept securely with restricted access to them. RBA Initiative will keep a safeguarding incident log in

which all reports will be kept confidentially and securely, with password protected access. Safeguarding records should distinguish between fact, opinion, and hearsay.

The duration for which safeguarding records should be kept is detailed below. At the conclusion of the periods listed - and before any records are destroyed - legislation should be reviewed to ascertain whether there is a requirement to keep records for a longer period.

- For incident where the victim is a child, 15 years from the date of reporting.
- For incidents where the victim is a young person or adult at risk who is 18 years old or over, 7 years from the date of reporting.
- For concerns or incidents involving a RBA Initiative staff member, 15 years from the date of reporting.
- For concerns or incidents involving a RBA Initiative Representative who is not a staff member, or a Visitor, 7 years from the date of reporting.

When safeguarding allegation concerns a RBA Initiative Visitor, beneficiary or other external partner. In instances where the allegation is against an external individual or individuals without a contractual relationship, such as RBA Initiative visitors or RBA Initiative activity / event participants, the procedures will require some adaption as internal employment process (e.g. disciplinary actions, training) will not be possible.

A formal referral to statutory services (children's services and police, if a crime may have been committed) or external child or adult protection agencies can be carried out. Any referral made to statutory services/ external agencies should be followed up after three working days to check that action has been taken.

The Safeguarding Lead (or Officer) must record all actions taken, decisions and outcomes. The Safeguarding Lead (or Officer) should also consider if there is any additional support that RBA Initiative can provide for the child or adult at risk or signpost to other support services in the locality.