

Implementation Requirements for Safeguarding Policy of the International Award Foundation

The Duke of Edinburgh's International Award China

June 2023
Version: 2.0



Version control

Version	Date	Author	Notes
1.0	Feb 2020	China NAO	
2.0	June 2023	China NAO	Includes updated Code of Conduct

Relevant Policies and documentation

1. International Licence agreements
2. Serious Incident Reporting Policy
3. Code of Conduct
4. Whistleblowing policy
5. Fundamental, Operational Principles and Code of Practice
6. Memorandum of Understanding (MOU) International Award Association (IAA)

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1 Keeping those involved with the Award safe from harm

The Duke of Edinburgh's International Award (hereinafter referred to as the "Award") is an international award granted by the Duke of Edinburgh's International Award Foundation (hereinafter referred to as the "Foundation"). Shanghai Enshaw Technology Group Co., Ltd. is the official agency of the Duke of Edinburgh's International Award in mainland China (excluding the Hong Kong Special Administrative Region, Macau Special Administrative Region, and Taiwan of the People's Republic of China, hereinafter the same) and has obtained an exclusive, transferable license for the relevant intellectual property rights from the Duke of Edinburgh's International Award Foundation to sublicense the relevant intellectual property rights to carry out its business. In this "Implementation Requirements for the Safeguarding Policy of the International Award Foundation" (hereinafter referred to as "this Document"), Shanghai Enshaw Technology Group Co., Ltd., Beijing Intaward International Culture Development Co., Ltd., and their affiliated companies are collectively referred to as "China NAO" or "we".

China NAO requires all licensed Award delivery partners in Mainland China (referred to as "Award Delivery Partners", including but not limited to National Award Centers (NAC), Award Centers (AC), Open Award Centers (OAC), and Recognized Activity Providers (RAP) to comply with and implement the Foundation's safeguarding policy (including any amendments and supplements made by the Foundation from time to time) as well as this Document.

1.1 The Foundation has a zero-tolerance policy towards harassment or exploitation of Award participants, their communities, Award Delivery Partners, partner organisations, staff, or volunteers, and we are committed to adhering to the highest possible standards of protection measures.

1.2 The Foundation licenses Award operators worldwide. Each year, more than one million young people participate in the Award activities across over 130 countries and territories. These young people are supported by nearly 200,000 adults who mentor Award participants (including children, young people, and vulnerable adults) through their Award journey, empowering them to develop and support their communities. Keeping Award participants, and those they engage with, safe from harm is the Awards number one priority.

1.3 The Foundation's safeguarding policy aims to provide guidance on governance, management, and implementation for all Award activities worldwide. It stipulates the required standards and methodology for protecting those who come into contact with the Foundation and ensuring that children, young people, and vulnerable adults involved in the Award activities are protected and safe from harm. This is the policy that Award operators must adhere to. This Document sets forth the specific requirements for China NAO in Mainland China to implement the Foundation's safeguarding policy, which Award Delivery Partners in China must also comply with.

1.4. All Award Delivery Partners are committed to:

- I. Ensuring the interests and well-being of children, young people and vulnerable adults are taken into account, in all our considerations and activities, wherever in the world those may be.
- II. Respecting the rights, wishes and feelings of the children, young people and vulnerable adults with

whom we, our licensees and associated organizations' work.

III. Taking all reasonable practicable steps to protect children, young people and vulnerable adults from neglect, physical, sexual and emotional abuse and to promote their health, wellbeing and human rights.

IV. Promoting the welfare of children, young people and vulnerable adults and their protection within a position of trust.

1.5 The Safeguarding Policy of the Foundation has been developed based on guidance and support materials produced by the UK Government's Department for International Development, UK Charity Commission and the International Keeping Children Safe Standards. This Document is developed to implement the Foundation's safeguarding policy in accordance with the relevant requirements of Mainland China's laws.

1.6. The potential for abuse, harm and violence exists in all countries and all sectors. While we work to mitigate risk and minimize harm, when things go wrong, we expect Award Delivery Partners to be judged on the following:

- I. the measures Award Delivery Partners have in place to prevent abuse or misconduct from occurring;
- II. the manner in which Award Delivery Partners respond to an incident of abuse or misconduct; and
- III. the actions Award Delivery Partners take to reduce the risk of the incident being repeated.

1.7. As a registered charity in the UK, the Foundation is obliged by UK law to report to the UK Charity Commission any serious incident, accident or potential claim that may have an adverse impact on the Award. As the licensed National Award Operator, China NAO has an obligation to accept and handle complaints and reports from Award Delivery Partners in accordance with the provisions of this Document.

2. Definitions and principles of safeguarding

2.1 Safeguarding refers to protecting all people and the environment from all harm, unintended or otherwise. In the context of the Award, it specifically refers to preventing and responding to harm caused by sexual exploitation, abuse, harassment or bullying of any kind. Children, young people and vulnerable adults are at particular risk of harm from exploitation, harassment or abuse and the safeguarding policy of the Foundation therefore focuses on these groups.

2.2 The aim of the safeguarding policy of the Foundation, and connected policies and licence agreements, is to minimize the likelihood and impact of these actions on Award beneficiaries and on those working or volunteering for and with the Foundation and/or China NAO, Award Delivery Partners.

2.3 The purpose of the safeguarding policy of the Foundation is to enable all children, young people and vulnerable adults to have the best outcomes from their Award experience, regardless of sex, age, disability, sexual orientation, race, religion or gender reassignment.

2.4 The UK Government Department for International Development defines child safeguarding to specifically encompass all forms of harm including physical abuse, sexual abuse, online abuse, child sexual exploitation, neglect and negligent treatment, emotional abuse and commercial exploitation. It covers all children but those who have additional vulnerabilities (for example, children with disabilities,

unaccompanied children, refugees, victims of trafficking/modern slavery) will require additional safeguarding considerations.

2.5 Based on the UN' s guidance, in safeguarding terms a child is defined as any person below the age of eighteen years. In accordance with Mainland China's laws and following the UN's guidance this Document also defines a child as a person under the age of 18.

2.6 Based on the UK Charity Commission' s definition, a vulnerable adult (or 'adults at risk') means any person aged 18 or over who is or may be in need of care and support (e.g. health care, relevant personal care or social care) and is experiencing or is at risk of abuse or neglect and, as a result of those care and support needs, is unable to protect themselves from either the risk or experience of neglect or abuse. In the context of the Award, it is important to note that typically (but not exclusively) vulnerable adults would only be engaged in the Award as beneficiaries where Award participants are volunteering their time to support them.

2.7 In the context of the Award, to ensure we can have the highest standards of safeguarding processes and protocols, all children, young people and vulnerable adults should be protected on the basis of the DIFD child safeguarding definition.

2.8 Award participants are aged between 14 and 24. For the purposes of the Award, all Award participants are considered to be either a child or young person when considering how they should be treated in regard to contact with adults.

2.9 Almost 200,000 adults are engaged in Award related activities that bring them into contact, regularly or from time to time, with children, young people and vulnerable adults. These "Adults in the Award" include paid staff and volunteers acting as Award Leaders, Adventurous Journey Supervisors, Award Assessors (or equivalent titles) and volunteers in a range of different roles. In the context of the Award, an 'adult' volunteer or paid employee is defined as anyone over the age of 16.

2.10 Award participants may engage with children, young people and/or vulnerable adults during the course of their Award. In this case, an Award participant, even if aged under 16, must adhere to the standards of conduct described in this policy and expected of an adult engaged in Award related activity.

2.11 It is important to note that a child, young person or vulnerable adult may occupy the role of Award participant and Adult in the Award concurrently.

2.12 Award delivery partners' approach to safeguarding are underpinned by the following principles:

- Everyone has a responsibility for safeguarding
- Do no harm
- Act in the best interests of the child/young person/vulnerable adult
- All children, young people and vulnerable adults shall be treated equally, irrespective of race, gender, religion/or none, sexual orientation or disability
- Safeguarding should be embedded in all of our activities as an organisation

3 Safeguarding framework

3.1 The Foundation's approach to maintaining a safe, positive and empowering environment for youth development is encompassed in a safeguarding framework comprising six core areas. This framework is based on guidance from the UK Department for International Development and includes the requirements as stipulated by the Award's international licence agreements. The framework and principles outlined within it are aligned with the UN Convention on the Rights of the Child (UNCRC).

3.2 The framework sets out the key responsibilities and requirements for any licensed Award Operator and can be summarized in the following graphic:



1. General safeguarding and child safeguarding

Safeguarding shapes the approach, practice and culture of the Foundation and all licensed Award Operators, ensuring a comprehensively safe environment for all people who come into contact with the Award, including adults, children, young people and vulnerable adults. All Award Delivery Partners should be able to demonstrate:

- I. Safeguarding policy/policies
 - o Must have a child protection policy and/or a vulnerable adults policy in place.
 - o If not overt in the policy, must also have bullying, sexual exploitation and harassment and abuse policies. These may be 'stand-alone' policies or part of the organization's overall HR Manual.
- II. Serious Incident Reporting policy, and associated mechanisms
- III. Appropriate safeguarding training with the applicable laws and regulations in mainland China.
- IV. A Safeguarding Register
- V. Appropriate investigation processes
- VI. A disciplinary process
- VII. Adoption and use of the Due Diligence Framework (see Appendix 2)
- VIII. Due diligence conducted on downstream partners or funders

2. Whistleblowing

Whistleblowing allows concerns to be raised and resolved at the appropriate level. All Award Delivery Partners should be able to demonstrate:

- I. Whistleblowing policy
- II. Appropriate training policy for understanding the process
- III. A complaints process. Award Delivery Partners must attempt to resolve complaints amicably through negotiation with the complainant. If the Award Delivery Partners are unable to resolve the complaint through amicable negotiation with the complainant, they should report to China NAO. The email address for receiving complaints is ceo@intawardchina.cn, and they should assist China NAO in resolving the complaint with the complainant through amicable negotiation.
- IV. Commitment to no reprisals

3. Human resources

Recruitment and vetting processes should support recruitment of the right people, and on-going safeguarding training should be provided for all staff and volunteers. All Award Delivery Partners should be able to demonstrate that all that all paid staff, Award Leaders, Adventurous Journey Supervisors, and Award Assessors (or equivalent titles) must:

- I. Have clear job descriptions; including an identified risk level for each role
- II. Have competency-based selection procedures for roles working directly with children/young people
- III. Be 18yrs+
- IV. Be trained, including mandatory safeguarding and whistleblowing training at point of induction
- V. Be appropriately vetted (according to mainland China's standards)
- VI. Be aware of and committed to the vision and values of the International Award
- VII. Be compliant with mainland China's child protection guidelines and health & safety legislation
- VIII. Conduct ongoing safeguarding and whistleblowing training for staff

4. Risk management

A risk management framework must set out the Foundation and Award Operators' approach to risk identification and assessment. All Award Delivery Partners should be able to demonstrate:

- I. Risk management policy; with safeguarding as a distinct risk category
- II. Risk assessments conducted on downstream partners
- III. Adoption and use of the Due Diligence Framework (see Appendix 2, below)
- IV. Risk register, with safeguarding as a distinct category; maintained and regularly reviewed. It should include mitigating actions and identifiable owners for each risk.
- V. Process for escalation of safeguarding risks
- VI. Oversight by a designated senior staff member of the organization [Designated Safeguarding Lead]

5. Code of Conduct

A Code of Conduct describes the ethics and behaviours required of all individuals, to ensure a robust safeguarding environment. All Award Delivery Partners should be able to demonstrate:

- I. Adoption of the Award Code of Conduct (see Appendix 1, below – this is a minimum) by all staff, volunteers and, where applicable, children/young people/vulnerable adults.
- II. An operating environment that supports Adults in the Award to adhere to the standards of the Code of Conduct, as a minimum.

6. Governance and accountability

Award Delivery Partners' Board has ultimate responsibility for the safeguarding of its Award participants, staff and volunteers. It is vital that the Board is independent in its safeguarding decision making. All Award Delivery Partners should be able to demonstrate:

- I. A designated safeguarding lead at Board level
- II. Evidence of regular engagement between the designated safeguarding lead and the management of the organization; evidence of regular reporting could be a standing agenda item in meetings, or through the regular updates to the risk register

4 Code of conduct and re-committing on a three-year cycle

4.1 The Foundation has published a Code of Conduct with regard to safeguarding, see Appendix 1. It describes what behaviours the Foundation expects of individuals and the organizations to which they belong.

4.2 All Adults in the Award, regardless of appointment or role, are expected to adhere to this Code of Conduct (or a variation of) and treat it as a description of a minimum standard of behaviour, recognising that further standards may be required by the legislation in mainland China or policies set by China NAO or its Award Delivery Partners.

4.3 Every Adult in the Award, and every Award participant working with children, young people and vulnerable adults, should be provided with a copy of the Code of Conduct as part of their induction to the Award.

4.4 It is recommended that, as a minimum, all Adults in the Award, re-sign the Code of Conduct and where appropriate take a refresher version of the e-learning safeguarding guidance on a three-year cycle.

4.5 Organizations that work with Award participants should have appropriate policies and procedures in place to ensure, as a minimum, that they allow adults to comply with the Code of Conduct.

During each license review, Award Delivery Partners should provide China NAO with evidence of policies and procedures that comply with the Foundation's safeguarding policy, Code of Conduct, and the requirements of this Document.

5 Safeguarding due diligence

5.1 Award Delivery Partners should conduct due diligence when selecting organisations and individuals with whom to partner with to deliver Award activity.

5.3 Appropriate due diligence should be carried out under the principle of proportionality. A risk assessment should be conducted to establish appropriate levels of due diligence.

5.4 The due diligence framework (Appendix 2) shall be used to structure safeguarding due diligence assessments, alongside and in addition to existing licence requirements.

6 Reporting procedures

6.1 For Award Delivery Partners to respond to any actual, suspected, or alleged incidents of exploitation, abuse, harassment, or bullying:

I. In the first instance, the incident should be reported to the appropriate law enforcement authorities, should that be appropriate .

II. Award Delivery Partners should take necessary immediate actions to remove any actual or alleged victim from the threat of imminent (further) harm.

III. If applicable, the incident of concern should also be reported in accordance with the Serious Incident Reporting Policy and associated procedures to China NAO.

6.2 Any contravention of the Safeguarding Policy, or any of the elements of the Safeguarding Framework, should be reported to the highest person in charge of the Award Delivery Partners, and copied to China NAO's Operations team via email: operations@intawardchina.cn.

6.3 If the incident is serious (as defined by the Serious Incident Reporting Policy), it should be reported to China NAO via email: ceo@intawardchina.cn.

7 General complaints

7.1 The Safeguarding Policy, as well as the associated Serious Incident Reporting Policy and serious incident reporting procedure, are independent from and not affected by the Foundation's complaints procedure. If a stakeholder wishes to make a complaint to the Foundation regarding the handling of a safeguarding concern or the response to a concern, the complaints procedure should be pursued independently of the Serious Incident Reporting procedure.

7.2 The complaints procedure is as follows:

First, Award Delivery Partners must attempt to resolve complaints amicably through negotiation with the complainant. If the Award Delivery Partners are unable to resolve the complaint through amicable negotiation, they should report to China NAO (the email address for receiving complaints is ceo@intawardchina.cn), and assist China NAO in resolving the complaint with the complainant through amicable negotiation. If both the Award Delivery Partners and China NAO are unable to resolve the complaint through amicable negotiation, the Foundation's complaint process should be followed.

8 Further information

8.1 For more information or to discuss any aspect of this Document, please contact China NAO's Operations team at the following email address: operations@intawardchina.cn.

Appendix 1. Code of Conduct

It is the policy of The Duke of Edinburgh's International Award to safeguard the welfare and well-being of the young people who participate in the Award, by protecting them from abuse, from neglect and from physical, sexual and emotional harm.

All adults engaged with the Award have a duty to report concerns or suspicions and a right to do so in confidence and free from harassment.

The Code of Conduct is applicable to in-person, online, social media and virtual situations.

ALWAYS:-

- ALWAYS treat everyone with respect
- ALWAYS provide the example you wish others to follow
- ALWAYS plan activities that involve groups of three or more - or at least which are within sight or hearing of others
- ALWAYS respect everyone's right to personal privacy
- ALWAYS provide access for young people to talk to others about any concerns they may have
- ALWAYS encourage young people and adults to feel comfortable and caring enough to point out attitudes or behaviour they do not like
- ALWAYS avoid situations that compromise or are unacceptable within your relationship of trust with young people
- ALWAYS remember that someone else might misinterpret your actions, no matter how well intentioned
- ALWAYS recognize that caution is required even in sensitive moments, such as dealing with bullying, bereavement, or abuse

NEVER:-

- NEVER permit abusive youth peer activities (e.g. bullying)
- NEVER have any inappropriate physical or verbal contact with others
- NEVER jump to conclusions about others without checking facts
- NEVER exaggerate or trivialise child-abuse and child protection issues
- NEVER show favouritism to any individual

- NEVER make suggestive remarks or gestures, even in fun
- NEVER believe “it could never happen to me”

If you are concerned

1. Tell your Manager or another person in authority immediately.
2. Write careful notes of what you witnessed, heard or were told.
3. Include the time and date and full names of those involved.
4. Pass your notes to your Manager or another person in authority as soon as possible.

What to do if ...

If an award participant tells you they are being neglected, mistreated, or abused, you must:

1. Ensure they can speak without interruption, and accept what they say.
2. Be understanding and reassuring – do not give your opinion.
3. Tell them you will try to help but must pass the information on.
4. Write careful notes of what was said using the actual words.
5. Include the time and date and full names of those involved.
6. Tell your Award Leader or another person in authority immediately.

Appendix 2. Due diligence framework

The following template may be used to structure an Award delivery partner's due diligence procedures in relation to safeguarding generally, and to child safeguarding specifically. A risk assessment should inform whether some or all of the areas listed are required.

DUE DILIGENCE ON GENERAL SAFEGUARDING	SPECIFIC DUE DILIGENCE ON CHILD SAFEGUARDING These questions are based on the International Keeping Children Safe Standards.
Safeguarding	Child Safeguarding
Do you have a safeguarding policy?	Does the organisation have a written child protection (safeguarding) policy to which all staff and associates, including partners, are required to adhere?
Does the policy include a statement of your commitment to safeguarding, including a zero tolerance statement on bullying, harassment and sexual exploitation and abuse?	Is the policy clear that all children have equal rights to protection and that some children face particular risks and difficulties in getting help, because of their ethnicity, gender, age, religion, disability or sexual orientation?
Do you keep a detailed register of safeguarding issues raised and how they were dealt with? Do you treat historical allegations separately and differently from current disclosures?	Is the definition of a child in the policy any person under the age of 18?
Does your recruitment policy include a criminal background check on candidates? In particular, specifically where the programme would involve working with children or vulnerable adults.	Has the policy been publicised and communicated to children and caregivers?
Do you share your safeguarding policy with partners?	Does the policy address safeguarding children from harm through misconduct by staff, volunteers, associates and others, from poor practice, and from its operational activities?
Do you have a designated senior safeguarding officer who reports regularly to the senior leadership and Board?	Does the organisation have internal processes to address child protection concerns appropriately?
Do you provide mandatory training on safeguarding to new trustees/staff/volunteers within a suitable and appropriate timeframe of them joining your organisation?	Has the organisation conducted a mapping exercise of local child protection services and child safeguarding risks? For example, if a serious child protection (safeguarding) issue is reported, does the organisation know when this

	should be reported to relevant authorities (e.g. police, social welfare)?
Do you provide regular (mandatory refresher training on safeguarding to staff/volunteers?	
Whistleblowing	
Do you have a whistleblowing policy which protects whistle-blowers from reprisals and includes clear processes for dealing with concerns raised and by whom and the timelines involved?	Do staff and volunteers know how to report a child safeguarding concern?
Do you provide mandatory training on whistleblowing to new trustees/staff/volunteers within a suitable and appropriate timeframe of them joining your organisation?	Are there child-friendly reporting mechanisms in place with clear step-by-step guidance on how to report safely and where to get help?
	Is there a mechanism to report anonymously?
	Are staff and volunteers trained in receiving disclosures and allegations from children and able to communicate in a child friendly manner with children, especially when conducting
	Are investigation procedures appropriate for children (so that children are not re-traumatised by the process and the 'every action should be in the best interest of the child' principle is upheld)
HR, Recruitment and Selection	
Do you have different levels of recruitment and security checks commensurate with safeguarding requirements of the role?	Does the organisation designate key people at different levels (including senior level) as "focal points" with defined responsibilities to champion, support and communicate on child safeguarding and for effective operation of the child safeguarding policy?
Does your recruitment process consider and evidence the level of safeguarding risk in a job role?	Do recruitment processes have child safeguarding checks in place? Recruitment adverts, interviews and contracts all outline a commitment to child safeguarding and make clear staff roles and responsibilities regarding child safeguarding, such as mandatory reporting?
Does your HR. policy depict a well-planned interview process?	Does staff and volunteers induction and training include specific material on safeguarding needs

	of children, risks, types of abuse and barriers to reporting faced by children?
Do interviewers have the relevant experience and knowledge of current safeguarding practices?	
If the role is for those working directly with vulnerable groups then does your policy include specific questions in the interview that draw out people' s attitudes and values in relation to the protection of children and/or vulnerable adults?	
Do you require up to two references including from previous employers or others who have knowledge of the candidate' s experience and suitability to work with children?	
Does your policy require that background checks should be carried out for all prospective employees?	
Do you make use of probationary periods of employment to ensure suitability once in post?	
Risk Management	
Do you have a risk management policy or framework capturing risk appetite and risk categories including safeguarding?	Are there specific risks and mitigating controls identified to protect children that come into contact with programme staff, operations and downstream partners?
Do you share your risk management policy where it relates to safeguarding risks with your downstream partners i.e. are downstream partners advised on escalation procedures around safeguarding issues?	Are they reflected on programme risk registers with risk owners recorded?
Do you have risk registers for all programmes that feed into an overall organisational risk framework?	
Is there regular senior oversight of your risk register?	
If applicable - are fundraising ideas and external communications risk assessed to ensure no harm is done by the activity? E.g. Fundraising is delivered in the context of	

Codes of Conduct	
Does the organisation have in place a Code of Conduct for staff and volunteers that sets out clear expectations of behaviours – inside and outside the workplace – and what will happen in the event of non-compliance or breach of these standards?	Does the organisation have a Code of Conduct for working with children, including at events, which all staff and associates need to adhere to on taking up employment?
Does the code of conduct prioritise the wellbeing and care of all people including beneficiaries?	
Are all staff and volunteers provided with training on the code of conduct as part of their induction?	
Are there policies and practices for the management of downstream partners and affiliates aligned to the Code of Conduct?	
Governance and Accountability	
Does the governance structure reflect regular review of management of safeguarding issues internally and externally?	Does the governing body understand where the organisation comes into contact with children and the risks involved; and is there a formal system of reporting to the board to track progress and performance on child safeguarding, including information on cases?
Do you have a designated safeguarding officer at board level who is responsible and accountable for safeguarding standards and reporting across the organisation and also includes downstream partners approach to safeguarding?	Are children and care givers consulted in the design, development and monitoring of safeguarding measures? Are beneficiary feedback mechanisms in place and are they tailored towards child-friendly feedback?
Are your beneficiaries actively involved in any of the governance structures of the organisation and/or specifically within programmes which affect them and their communities?	
Do your downstream partners have in place procedures to ensure safeguarding issues are escalated to the Board?	