



## SAFEGUARDING POLICY AND PRINCIPLES

### I. Introduction

FrameWorks Institute and FrameWorks UK are related public purpose organizations with a shared mission of advancing the nonprofit sector's communications capacity by identifying, translating, and modeling relevant scholarly research to frame the public discourse on social problems. The organizations carry out this mission working individually and collaboratively in the United States, the United Kingdom, and a number of other countries around the globe.

Both organizations (hereinafter collectively referred to as "FrameWorks") have a responsibility to protect children, young people, and vulnerable adults who take part in research, events or other activities either hosted by FrameWorks or in which FrameWorks participates. This policy sets out the procedures by which FrameWorks carries out this responsibility in accordance with the applicable laws of the US and the UK.<sup>1</sup>

When work takes place in countries other than the US and the UK, FrameWorks personnel are responsible for adhering to the requirements of The International Child Safeguarding Standards<sup>2</sup> and to the principles and procedures set out in this policy insofar as they are applicable.

### II. Definitions

#### A. "Harm"

1. For work performed in the United States, the term "harm" incorporates the definitions of "child abuse" and "negligent treatment" as contained in Chapter 132 of

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<sup>1</sup> FrameWorks Institute is a 501(c)(3) public charity incorporated in the State of Delaware with its principal place of business in Washington DC. This policy is governed by the laws of the United States and the District of Columbia for work performed in the United States.

FrameWorks UK Research & Communications, company number 13134288, is a company limited by guarantee registered in England and Wales. This policy is governed by the laws of the United Kingdom for work performed in the United Kingdom.

<sup>2</sup> <https://www.keepingchildrensafe.global/accountability/>

Title 42 of the US Code and Chapters 13 and 23 of the Code of the District of Columbia (see Appendix A). The term further incorporates the definitions of “abuse” and “neglect” applicable to vulnerable adults contained in Chapter 35 of Title 42 of the US Code and Chapter 19 of the Code of the District of Columbia (see Appendix A).

2. For work performed in the United Kingdom, the term “harm” incorporates the definitions of “harm” as contained in the Children Act of 1989 (see Appendix A).

B. “Child” is defined as an individual under the age of 18, consistent with the laws of the United States and United Kingdom, and the United Nations Convention on the Rights of the Child.

C. “Young person” is defined as an individual aged 15 to 24 years old, as recognized in the United Nations Convention on the Rights of the Child, who may have particular safeguarding needs and require distinct consideration than a child or vulnerable adult.

D. “Vulnerable adult”

1. For work performed in the United States, the term “vulnerable adult” incorporates the definition of “vulnerable adult” as contained in Chapter 9A of Title 22 of the Code of the District of Columbia (see Appendix A).

2. For work performed in the United Kingdom, the term “vulnerable adult” incorporates the definitions of “adult in need of care and support to ensure well-being” in the Care Act of 2014 (see Appendix A).

E. “FrameWorks personnel” is defined as

1. Employees of FrameWorks Institute and FrameWorks UK;
2. All people acting on behalf of and representing FrameWorks as contractors and/or consultants; and
3. Members of the Boards of Directors of FrameWorks Institute and FrameWorks UK.

F. “Sensitive issues” in research are defined with reference to the types of threat identified by Lee (1993):<sup>3</sup>

1. Intrusive threat. Where the research covers matters that are private, stressful, or sacred, or otherwise deeply emotional. For instance, conversations about religious beliefs, sexual practices, abuse, experiences of racism, mental health, death.

2. Threat of sanction. Where the research might solicit information that is stigmatizing or incriminating in some way. For instance, if conversations could reveal

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<sup>3</sup> Lee, R. M. (1993). *Doing research on sensitive topics*: Sage Publications Inc; Dickson-Swift, V., James, E. L., & Liamputtong, P. (2008). *Undertaking Sensitive Research in the Health and Social Sciences*: Cambridge University Press [https://assets.cambridge.org/97805217/18233/excerpt/9780521718233\\_excerpt.pdf](https://assets.cambridge.org/97805217/18233/excerpt/9780521718233_excerpt.pdf)

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illegal behaviors like gambling or drug addiction, or involvement in a breach of human rights such as human trafficking. Includes research that might expose participants to derogation as a result of taking part in it. For instance, taking part in a study that would identify participants as being LGBTI.

3. Political threat. Where participation in the research could lead to repercussions from powerful individuals or groups who feel their interests are threatened. For instance, investigating policing in Northern Ireland or whistleblowing corporate malpractice.

### III. Principles

In order to uphold its responsibilities to children, young people and vulnerable adults, FrameWorks commits to the following principles:

1. No child, young person or vulnerable adult must suffer harm, intentionally or unintentionally, as a result of their engagement, association or contact with FrameWorks.
2. All children under the age of 18 need to be protected from all forms of violence.
3. The human rights of children, young people and vulnerable adults will be respected and applied to all irrespective of any personal, social or cultural characteristic or other aspect of their background or identity. Inequality, exclusion, and discrimination will not be tolerated.

### IV. Practice

FrameWorks does not routinely work directly with children or vulnerable adults, although we do sometimes work with these populations as research participants or communications messengers. However, personnel often interact with research participants or other stakeholders without knowledge of their age and/or life experience and so should assume that they may interact with such individuals in *any* research project or activity. Accordingly, this policy and guidance applies to FrameWorks personnel in all situations.

In order to safeguard children, young people and vulnerable adults, FrameWorks will:

- Make this policy publicly accessible by posting it on the FrameWorks website.
- Inform all research participants during the consent process of their rights as human research subjects and explain the measures taken by FrameWorks' researchers to ensure their safety and wellbeing.
- Provide this policy to research participants as part of the informed consent process described above. In cases where the subject matter of the research is itself sensitive,

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FrameWorks will inform participants of the potential for harm prior to obtaining their consent to participate.

- Ensure personnel are aware of their safeguarding responsibilities and that they should adhere to the practices within this policy.
- Assess the risks in all activities involving children, young people or vulnerable adults, taking account of their ages.
- Recruit, manage and deploy personnel with training, guidance, supervision, and support appropriate to their role at FrameWorks.
- To safeguard the welfare of personnel, personnel may elect not to work on certain topics if they are not comfortable doing so.

In addition, FrameWorks routinely seeks Institutional Review Board (IRB) review for projects that specifically recruit children, young people or vulnerable adults or for research on sensitive issues. This ensures that our research methods are externally vetted and meet safeguarding as well as broader ethical requirements.

When we do work with children, FrameWorks will abide by the Society for Research in Child Development's ethical standards for research with children.<sup>4</sup> Informed consent will be obtained from parents or legal guardians. In addition, personnel will respect the child's freedom to choose to participate in the research or not by giving the child the opportunity to give or not give assent to participate as well as to choose to discontinue participation at any time.

Additionally, FrameWorks will seek to ensure that children are accompanied to the research site by a responsible adult. Where this is not possible, FrameWorks will ensure that at least two FrameWorks personnel are present and will obtain written consent from the child's parent/guardian/carer. Where possible, personnel will obtain and record of two emergency contact details for the child, as well as any medical or other relevant details. Personnel who are assigned to or might otherwise participate in any work involving children have an affirmative duty to inform FrameWorks in advance if they are disqualified from working with children.

#### IV. Process for situations involving potential harm

In a situation where FrameWorks personnel become aware of potential harm to a child, young person or vulnerable adult, the following process should be followed.

A. If FrameWorks personnel are concerned about a safeguarding issue, they should document the concern as soon as it is raised, preferably using available report templates, and speak to either their direct supervisor or the safeguarding lead as soon as possible, but no later than 24 hours after first learning of the issue.

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<sup>4</sup> <https://www.srcd.org/about-us/ethical-standards-research-children>

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B. All safeguarding incidents must be reported to the safeguarding lead by the personnel involved and/or their direct supervisor.

C. If a child, young person or vulnerable adult confides in FrameWorks personnel and describes harm to themselves, personnel should contact the safeguarding lead immediately. And, wherever appropriate, a report will be made by the safeguarding lead to the relevant authorities without delay.

D. If, in their interactions with a child, young person or vulnerable adult, FrameWorks personnel suspect that the child, young person or vulnerable adult is subject to harm or is otherwise in distress, they should raise their concerns with the safeguarding lead.

E. In the event of an incident or allegation being reported to a direct supervisor or the safeguarding lead under this policy, FrameWorks will keep a dedicated log of all written and oral statements, along with a record of relevant telephone conversations.

F. In the event of an incident or allegation arising under this policy, all personnel will ensure that they comply with any applicable requirements in the jurisdiction in which the incident or allegation occurred for reporting the potential harm to relevant authorities. For work performed in the United States, FrameWorks personnel must consult with Senior Vice President of Operations to determine the applicable laws of the state where the child, young person or vulnerable adult lives, whether reporting is mandatory, and the appropriate process for making a report, whether mandatory or not.

As a matter of principle, any decisions to make a report to relevant authorities of potential harm to a child, young person or vulnerable adult will be made insofar as possible with their participation and in their best interest, giving full consideration to how such decisions will affect them.

G. If a legitimate concern about potential harm to a child, young person or vulnerable adult is raised by FrameWorks personnel but proves to be unfounded upon investigation, no action will be taken against the reporter. However, in cases of false accusations, appropriate disciplinary action will be taken pursuant to FrameWorks' personnel policies.

## V. Process for policy violations by FrameWorks personnel

FrameWorks takes seriously the responsibility for safeguarding of children, young people and vulnerable adults, and will take appropriate action in response to any breaches of this policy by FrameWorks personnel. A suspected breach will be investigated in accordance with FrameWorks' personnel policies and/or the terms of any contractual agreements. A violation of this policy may lead to severing the relationship of such personnel with FrameWorks, including the termination of contractual and partnership agreements. Violations may be reported to relevant authorities for investigation under appropriate circumstances.

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## VI. Review of Policy

FrameWorks will review its safeguarding policy on an annual basis. Updates will be considered by the Chief Executive Officer of FrameWorks Institute and the Executive Director of FrameWorks UK, and the respective boards of each organization will assess safeguarding practice annually.

Our lead staff member responsible for safeguarding policy and practice in the United States is Eskedar Getahun, Chief of Staff. Our lead staff member responsible for safeguarding policy and practice in the United Kingdom is Kate Stanley, Executive Director.

Our lead Board Member with oversight of safeguarding in the United States is Paula Tyler, Board Chair. Our lead Board Member with oversight of safeguarding in the United Kingdom is Sally Bacon, Board Chair.

## Appendix A

### Applicable portions of laws in the United States:

[T]he term “child abuse” means the physical or mental injury, sexual abuse or exploitation, or negligent treatment of a child;

[T]he term “negligent treatment” means the failure to provide, for reasons other than poverty, adequate food, clothing, shelter, or medical care so as to seriously endanger the physical health of the child;

[T]he term “child abuse” shall not include discipline administered by a parent or legal guardian to his or her child provided it is reasonable in manner and moderate in degree and otherwise does not constitute cruelty.

42 U.S.C. §13301

For vulnerable adults:

The term “abuse” means the willful--

(A) infliction of injury, unreasonable confinement, intimidation, or cruel punishment with resulting physical harm, pain, or mental anguish; or

(B) deprivation by a person, including a caregiver, of goods or services that are necessary to avoid physical harm, mental anguish, or mental illness.

The term “neglect” means--

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**(A)** the failure of a caregiver (as defined in paragraph (18)(B)) or fiduciary to provide the goods or services that are necessary to maintain the health or safety of an older individual; or

**(B)** self-neglect.

The term “[self-neglect](#)” means an adult’s inability, due to physical or mental impairment or diminished capacity, to perform essential self-care tasks including—

**(A)** obtaining essential food, clothing, shelter, and medical care;

**(B)** obtaining goods and services necessary to maintain physical health, mental and behavioral health, or general safety; or

**(C)** managing one’s own financial affairs.

42 U.S.C. §3002

The term “abused”, when used with reference to a child, means:

(i) infliction of physical or mental injury upon a child;

(ii) sexual abuse or exploitation of a child; or

(iii) negligent treatment or maltreatment of a child.

The term “abused”, when used with reference to a child, does not include discipline administered by a parent, guardian or custodian to his or her child; provided, that the discipline is reasonable in manner and moderate in degree and otherwise does not constitute cruelty.

The term “negligent treatment” or “maltreatment” means failure to provide adequate food, clothing, shelter, or medical care, which includes medical neglect, and the deprivation is not due to the lack of financial means of his or her parent, guardian, or other custodian.

D.C. Code §16-2301

"Vulnerable adult" means a person who is 18 years of age or older and has one or more physical or mental limitations that substantially impair the person's ability to independently provide for his or her daily needs or safeguard his or her person, property, or legal interests.

D.C. Code §22-932

For vulnerable adults:

“Abuse” means:

**(i)** The intentional or reckless infliction of serious physical pain or injury;

**(ii)** The use or threatened use of violence to force participation in “sexual conduct,” defined in [§ 22-3101\(5\)](#);

(iii) The repeated, intentional imposition of unreasonable confinement or threats to impose unreasonable confinement, resulting in severe mental distress;

(iv) The repeated use of threats or violence, resulting in shock or an intense, expressed fear for one's life or of serious physical injury; or

(v) The intentional or deliberately indifferent deprivation of essential food, shelter, or health care in violation of a caregiver's responsibilities, when that deprivation constitutes a serious threat to one's life or physical health.

"Neglect" means:

(i) The repeated, careless infliction of serious physical pain or injury;

(ii) The repeated failure of a caregiver to take reasonable steps, within the purview of his or her responsibilities, to protect against acts of abuse described in paragraph (1)(B) of this section;

(iii) The repeated, careless imposition of unreasonable confinement, resulting in severe mental distress; or

(iv) The careless deprivation of essential food, shelter, or health care in violation of a caregiver's responsibilities, when that deprivation constitutes a serious threat to one's life or physical health.

D.C. Code §7-1901

#### **Applicable portions of laws in the United Kingdom:**

"Harm" means ill-treatment or the impairment of health or development including, for example, impairment suffered from seeing or hearing the ill-treatment of another.

- "Development" means physical, intellectual, emotional, social or behavioural development.
- "Health" means physical or mental health.
- "Ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical.

Section 1 of the Children Act of 1989

"Well-being", in relation to an individual, means that individual's well-being so far as relating to any of the following—

(a) personal dignity (including treatment of the individual with respect);

(b) physical and mental health and emotional well-being;

(c) protection from abuse and neglect;

(d) control by the individual over day-to-day life (including over care and support, or support, provided to the individual and the way in which it is provided);

(e) participation in work, education, training or recreation;

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- (f) social and economic well-being;
- (g) domestic, family and personal relationships;
- (h) suitability of living accommodation;
- (i) the individual's contribution to society.

“Adult” means a person aged 18 or over.

Sections 1 and 2 of the Care Act of 2014 (as amended)