



SAFEGUARDING & CHILD PROTECTION POLICY

Note: This document includes policy and procedures for Safeguarding, including Child Protection and Prevention of Sexual Exploitation and Abuse, and is therefore an elaboration of related policy statements made in AIDE's Code of Conduct.

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PART 1 – THE POLICY

1.1 Introduction

Africa Institute for Development and Equity (“AIDE”) We offer Technical Assistance as well as Design, Review, or Implement Development Projects--based on the Client's or Partner's needs and defined Scope of Work.

We work in and have strong technical experience the areas of:

- Health Systems Strengthening
- Private Sector Development
- Security and Justice Sector Strengthening
- Human Capital Development
- Access, Equity, and Empowerment
- Peacebuilding and Conflict Prevention
- Performance Based Financing
- Community Development

Through our work, AIDE staff and affiliates may engage children and youth, as well as adults who may be unable to protect themselves for a variety of reasons (see definitions below). These groups face particular risks of discrimination, neglect, abuse, and exploitation by those in positions of trust and power over them. AIDE recognizes that we have a responsibility to ensure our staff, partners, operations, and programs do not expose these vulnerable groups to harm.

This Safeguarding and Child Protection Policy reflects *AIDE’s* commitment to keeping children, youth, and vulnerable adults safe from harm and abuse. It puts in place measures to build a safe environment for the children, young people, and vulnerable adults who come into contact with *AIDE* , as well as *AIDE* affiliates themselves. The Policy clearly addresses all areas of the safeguarding continuum: prevention, identification, reporting and response.

This Policy is one of several to be read in conjunction with *AIDE’s* Code of Conduct, the overarching ‘parent’ policy, which lays out a framework for ethical conduct across the organization. As such, all policies and procedures applying to compliance with and investigations around violations of the Code of Conduct also apply to Safeguarding and Child Protection, including reporting and investigation guidelines. The policy builds on best practices and standards in the safeguarding field and is a collection of Policies from International Agencies and Local Agencies—mainly CORDAID, SFCG, CRS, CAFOD, and TROCAIRE.

1.2 Purpose & Scope

AIDE’s Safeguarding Policy aims to protect children, young people, and vulnerable adults who come into contact with our organization, and our partners from physical, sexual, and emotional abuse, neglect, and exploitation. This policy aims to prevent, identify, and respond to safeguarding concerns, ensuring accountability at all times. *AIDE* has a zero-tolerance policy towards sexual misconduct, harassment, exploitation, or abuse of any kind.

The Safeguarding Policy applies to **everyone associated with AIDE** - including, but not limited to:

- All permanent and temporary members of staff
- Community-based staff or incentive workers (i.e., Community Observers, Community Case Workers)
- Volunteers, interns, and fellows
- Consultants
- Translators

- *AIDE's* Board of Directors
- Invited visitors (including donors/ funders; media/ journalists)
- Partner organizations (i.e., local NGOs, Government Ministries, etc.)
- Third-party contractors (i.e., suppliers, builders, etc.)
- Members of research bodies, academic institutions, and associates.

The umbrella term '*AIDE affiliates*' will be used to refer to all people associated with *AIDE* . Safeguarding and Child Protection is everyone's responsibility at *AIDE* .

TERMS AND DEFINITIONS

Safeguarding:¹ The organizational responsibility to take all reasonable steps to prevent harm from occurring as a result of *AIDE* staff, operations, and programs; to protect people, especially children, youth, and vulnerable adults, from the risk of harm that may be caused by coming into contact with *AIDE*; and to respond appropriately when harm does occur.

Child Protection:² Actions that individuals, organizations including *AIDE* , countries and communities take to protect children from acts of violence, abuse, neglect, and exploitation. This is an important part of safeguarding and includes programs implemented by *AIDE* or our partners to prevent, respond to, and resolve abuse experienced by children.

Child: Every human being below the age of 18. This policy applies equally to children regardless of their background, age, class, gender, geography, ethnicity, race, religion, ability, or sexual orientation.

Youth or Young People: "Youthhood" is a transitional period that overlaps with adolescence and adulthood and its precise definition varies between geographies and organizations. This policy primarily refers to individuals aged 15-25 years ("adolescence" through "early youth") recognizing that young people have distinct safeguarding needs for consideration, separate from the needs of younger children and vulnerable adults.

Vulnerable adult: A person who by reason of disability, age, gender, social and economic status, illness, or the context they are in, may be unable to take care of or to protect him or herself against abuse, harm, or exploitation.³

¹ Definition adapted from "Safeguarding and Child Protection Policy," Voluntary Service Overseas, p.2.

² The United Nations Convention on the Rights of the Child outlines in Article 19 children's rights for protection from "all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual violence."

³ Definition adapted from "[Safeguarding and Child Protection Policy](#)," Voluntary Service Overseas; "[Safeguarding Policy Templates](#)," bond (UK network for organisations working in international development).

ABUSE: TYPES AND DEFINITIONS

Abuse is the violation of a person's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial, or sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in *actual or potential harm* to the health, survival, development, or dignity of

a person, and especially a child, young person, or vulnerable adult. Abuse can be a single act or repeated acts and can be unintentional or deliberate.⁴ It may take place through physical, verbal, or digital interactions.

KEY RECOGNIZED TYPES OF HARM and ABUSE:⁵

- 1. Physical abuse:** Actual or potential physical harm perpetrated by another person, adult, or child.
This may involve hitting, slapping, shaking, poisoning, burning or other physical acts.
- 2. Emotional or psychological abuse:** Persistent emotional maltreatment that impacts negatively on a person's emotional and psychological development. This can occur in-person or online, including constant criticism, solitary confinement, and isolation, degrading treatment, belittling, humiliation, bullying (including cyber bullying), threats, discrimination, ridicule, or other non-physical forms of hostile or exclusionary treatment.
- 3. Sexual Harassment:** A continuum of unacceptable and unwelcome behaviors and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favors and sexual, verbal, or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating⁶.
- 4. Neglect:** Persistent failure to meet a vulnerable person's basic physical and/ or psychological needs - which is likely to result in serious impairment in his or her overall healthy development. This includes the failure to properly supervise and protect children, youth, and vulnerable adults from harm as well as provide adequate nutrition, shelter, and safe living conditions.
- 5. Sexual Abuse:** Forcing or enticing a vulnerable person to take part in sexual activities that he or she does not fully understand and has little choice but to consent to. This may include rape, oral sex, penetration, masturbation, kissing, rubbing and inappropriate touching. Sexual abuse also encompasses the involvement of children in the viewing or production of sexual images, witnessing sexual activities and the encouragement of children, youth, or vulnerable adults to behave in sexually inappropriate ways.
- 6. Exploitation:** This encompasses - but is not limited to - commercial and sexual exploitation: Commercial or other exploitation of a child refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labor that violates international standards or local law or that is dangerous and might harm their health, development, or education, including recruitment of children in to armed groups. Sexual exploitation, meanwhile, is a form of exploitation

⁴ Adapted from "Safeguarding and Child Protection Policy," Voluntary Service Overseas, p. 2;

⁵ Adapted from Keeping Children Safe. (2014), "Understanding Child Safeguarding, a Facilitators Guide," page 25.

⁶ UK Department for International Development: Guidance against Sexual Exploitation and Abuse and Sexual Harassment in the aid sector (2019)

<https://www.gov.uk/guidance/safeguarding-against-sexual-exploitation-and-abuse-and-sexual-harassment-seah-in-the-aid-sector>

and sexual abuse that involves any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.⁷ It involves children, youth, or vulnerable adults being engaged in any sexual

activity in exchange for money, gifts, food, accommodation, school fees, exam marks, or any other material needs (e.g., child prostitution, the trafficking of children, youth or vulnerable adults and the exploitation of and creation and dissemination of sexually explicit videos and pictures).

THE FOLLOWING PRACTICES CAN ALSO CONSTITUTE ABUSE:

Traditional Harmful Practices: Practices based on cultural beliefs and values that have harmful consequences for children, youth, or vulnerable adults e.g., witchcraft, early or forced marriage, female genital mutilation.

Digital abuse: Information and communication technologies can expose children, youth, and vulnerable adults to harm through exposing them to harmful material, sharing their personal information, and facilitating risky behavior. Some of these risks include exposure to violent or unwelcome sexual content, misinformation, cyberbullying and online harassment, surveillance, harvesting of their personal information, violation of privacy, scams, etc.

1.3 Statement of Commitment

AIDE is committed to the equal protection of *all people* from harm, abuse, neglect, and exploitation. We recognize that children, young people, and vulnerable adults have particular safeguarding needs, and we are committed to protecting them from harm that arises from coming into contact with our staff, operations, or programs. We are committed to the following core principles throughout safeguarding prevention, identification, reporting, and response:

1. **Equal Rights:** All children, youth, and vulnerable adults *without discrimination* have the right to be protected from exploitation, violence, abuse, and neglect.⁸⁹
2. **Everyone's responsibility:** All **AIDE affiliates** have a duty of care and responsibility to prioritize the safety and wellbeing of children, youth, and vulnerable adults when we come into direct or indirect contact with them.
3. **Mandatory, confidential reporting:** Any suspected violation or any violation of the Safeguarding Policy must be reported immediately to the HR Manager and/or Ethics & Safeguarding Focal Point. Confidentiality will be maintained throughout the entire procedure, as much as is feasible.
4. **Zero tolerance:** AIDE will not tolerate any form of abuse and will take all necessary measures to meet our duty of care and take action where we believe there is risk of harm or actual harm.
5. **Best Interest of the Child, Youth, or Vulnerable Adult:** All decisions and actions that affect children, youth, or vulnerable adults will be in accordance with their best interests.
6. **Do No Harm:** Our responsibility to minimize harm or exposure to harm for children, youth, and vulnerable adults that may inadvertently result from our programs or operations, including throughout the safeguarding reporting and response process.

⁷ UK Department for International Development: Guidance against Sexual Exploitation and Abuse and Sexual Harassment in the aid sector (2019)

<https://www.gov.uk/guidance/safeguarding-against-sexual-exploitation-and-abuse-and-sexual-harassment-seah-in-the-aid-sector>

⁸ As outlined in the UN Convention on the Rights of the Child, Articles 2 and 19 ([see summary here](#)), [UN Security Council Resolution 2250 \(summary here\)](#) and [U N Security Council Resolution 2535](#), UN Convention on the Rights of Persons with Disabilities [Article 16](#), and the [UN Voluntary Compact on Preventing Sexual Exploitation and Abuse](#)

⁹ As outlined in the UN Convention on the Rights of the Child, Article 3 ([see summary here](#))

7. **Risk Management:** AIDE ensures that risks are identified and minimized from the planning stage through to the implementation stage of activities.
8. **Transparency:** All children, youth, and vulnerable adults who met *AIDE* (as well as their caregivers and communities, as appropriate) should understand their rights to safety and protection, risks they face in participating, what behavior is not permitted by *AIDE* affiliates, and how to report and address concerns that may arise. Information must be disseminated in an appropriate manner respecting age, language, ability, literacy, and community.
9. **Participation:** *AIDE* recognizes that all children, youth, and vulnerable adults have the right to express and have their views taken seriously in all matters affecting them. *AIDE* also recognizes that meaningful participation enhances the wellbeing, development, and protection of children and youth. *AIDE* thus encourages children, youth, vulnerable adults, and their communities to speak openly about their interactions with *AIDE* affiliates and each other, empowers them so they are able to better protect themselves, and helps them to take part in decisions which concern them according to their age and level of maturity.
10. **Honoring Dignity:** AIDE and its affiliates must always treat the people we come into contact with- including children, youth, and vulnerable adults- with dignity and respect for their inherent worth and value as human beings.

1.4 Prevention

AIDE responsibilities

AIDE will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programs, activities, and operations in a way that protects people from harm that may arise from meeting *AIDE* . This includes the way in which information about individuals in our programs is gathered and communicated.
- Implement safeguarding procedures when recruiting and managing staff and other affiliates
- Ensure **every office** with programs or strategic priorities engaging children, youth, or vulnerable adults *assigns and trains an Ethics & safeguarding focal point, develops a process for safeguarding reporting and response based on applicable local legislation, procedures (including existing interagency protocols), and available services, and produces a summary in local languages and accessible formats for staff, affiliates, and program participants.*
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization.
- Monitor safeguarding trends and developments across the organization on a regular basis at the country, regional, and global levels
- Conduct a safeguarding self-audit every two years

For every project that meets children, youth, or vulnerable adults, *AIDE* will:

- Ensure project design and donor budget include safeguarding measures (outlined below)
- Assign and train an Ethics & Safeguarding Focal Point in each project office
- Assess safeguarding risks and capacities during project startup and identify mitigating measures, including developing or updating a referral list of support needed (e.g., safety, medical, mental health, and psychosocial, legal, basic needs)
- Require all partners to have their own appropriate safeguarding policy (which prohibits, prevents, and outlines appropriate reporting and response measures for the types of abuse above) or adapt *AIDE*'s and include safeguarding training as necessary in partner capacity building plans.
- Ensure safeguarding reporting and response procedures align with donor and existing interagency protocols
- Create a confidential complaint mechanism for feedback from participants and their communities throughout the project, aligned with local safeguarding reporting and response procedures developed by the country office

- Train all staff and affiliates involved in the project on safeguarding as well as reporting and response procedures
- Inform all partners, vendors, participants & communities of safeguarding commitments and procedures in local language(s)
- Gather feedback from participants on safeguarding efficacy and staff conduct during M&E
- Ensure all internal or external project communications uphold the core principles of Best Interest, Do No Harm, Honoring Dignity, and Participation. This includes securing written, informed consent in advance of any portrayal of participants in communications and defining appropriate communications by and between staff and participants.

Note: These safeguarding measures should be included in project design and donor budgets.

AIDE Staff & Affiliates

All AIDE staff and affiliates who meet children, youth, and vulnerable adults, both in our professional and private lives **should always:**

- Be aware of indicators of abuse, violence, neglect, or exploitation related to the categories of abuse above.
- Be aware that many of the children and youth, and some adults we work with may be particularly at risk, including unaccompanied and separated children, children and youth formerly associated with armed groups, persons with disabilities, and child-headed households.
- Treat all children, youth, and vulnerable adults with dignity and respect regardless of their race, gender, language, religion, opinions, nationality, ethnicity, origin, disability, sexuality, sexual orientation, gender identity, or other status.
- Be aware of possible risks AIDE affiliates, operations, or programs may pose to children, youth, and vulnerable adults, and the need to prevent these risks. (*See details on Safeguarding Risk Assessments below*).
- Ensure the best interest of the child, youth, or vulnerable adult is always prioritized above any other objectives.
- Avoid being placed in a position where they are alone with a child or children, youth, or vulnerable adult(s) with whom they come into contact as part of their work with AIDE without prior authorization of their manager, unless necessary and the child, youth, or vulnerable adult is in danger.
- Ensure all AIDE staff, affiliates and partners comply with the AIDE Safeguarding & Child Protection Policy, which must be read in conjunction with all other Policies, including the AIDE Code of Conduct.
- Comply fully with host country and local welfare and protection laws for children, youth, and vulnerable adults, including those in relation to child labor or with international standards, whichever gives greater protection.
- Comply with donor and best practice safeguarding standards.
- Disclose any convictions or investigations related to abuse (physical, sexual, emotional, or psychological, neglect, or exploitation) to which they are subject.
- Report any concerns or suspicions regarding safeguarding violations to the HR Manager / Ethics & Safeguarding focal point immediately and no later than 24 hours.

AIDE staff, affiliates or partners **must never** :

- Engage in any form of abuse, exploitation, or neglect, or put a child, youth, or vulnerable adult *at risk* of abuse or exploitation.
- Hit or physically assault or abuse children, youth, or vulnerable adults.
- Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years, regardless of the age of consent or custom locally. (Mistaken belief in the age of a child is not a defense).
- Engage in any form of sexual activity with participants.
- Participate in trafficking of persons, procuring commercial sex acts or using forced labor in the performance of a project.

- Develop, encourage, or fail to take action on relationships with children, youth, or vulnerable adults which could in any way be considered exploitative, inappropriate, sexual, or abusive.
- Spend excessive time alone or stay alone overnight with children, youth, or vulnerable adults benefiting from *AIDE* programmes who are not part of their family, whether in their house, *AIDE* office, or elsewhere.
- Condone or participate in behavior of children, youth, or vulnerable adults which is unsafe, illegal, discriminatory, or abusive.
- Act in ways to belittle, degrade, humiliate, shame, or perpetrate any other form of emotional abuse - whether through verbal or digital contact.
- Discriminate against or show preferential treatment towards particular participants.

- Expose children, youth, or vulnerable adults to inappropriate content including pornography, extreme violence, or otherwise inappropriate imagery.
- Agree with a child, youth, or vulnerable adult to keep a secret which has implications for their safety or the safety of other young people or vulnerable adults.
- Take or share photos or videos of children, youth, or vulnerable adult participants that are degrading, victimizing, or inappropriate, or do not have their informed consent, or are not strictly professional and approved accordingly.
- Place themselves in a position where they are vulnerable to allegations of misconduct.

Note: The above is not an exhaustive list. AIDE staff, representatives or partners should never exhibit any behavior or actions that may be experienced or perceived as abusive.

1.5 Reporting and Response

Identifying safeguarding concerns

As a staff, affiliate, or partner of *AIDE*, you may encounter various safeguarding concerns in the course of your work. Such concerns may include:

- A child, youth, or vulnerable adult disclosing to you or someone else that he or she has been abused.
- A child, youth, or vulnerable adult exhibiting concerning behavior e.g., overly sexualized behavior, crying, shaking.
- A child, youth, or vulnerable adult with an injury which is inconsistent with their explanation.
- Witnessing inappropriate behavior by an *AIDE* staff or affiliate towards a child, youth, or vulnerable adult.
- Receiving an allegation that an *AIDE* staff, affiliate, or partner is abusing a child, youth, or vulnerable adult.
- Witnessing abuse within another organization or within the wider community in which you work.

Note: All forms of abuse- emotional, physical, sexual, neglect and exploitation- are safeguarding concerns.

Receiving a disclosure from a child, youth, or vulnerable adult¹⁰

If a safeguarding concern is disclosed directly to you, observe the following good practices, using the acronym *LIVES* :

- **Listen** closely, with empathy, and without judging.
- **Inquire about needs and concerns** (emotional, physical, social, and practical, etc.).

¹⁰ Adapted from “Dealing with Safeguarding Reports,” bond, https://www.bond.org.uk/sites/default/files/bond_safeguarding_dealing_with_reports_procedure.pdf and the *Global PSEA Standard Operating Procedures and those on Inter-Agency Cooperation in Community-Based Complaint Mechanisms, endorsed by the IASC Principals in June 2016*

- **Validate**, by showing that you understand and believe him/her. Assure them that it is not their fault. Ask only relevant questions required to gain a clear understanding of the complaint (who, what, where, when, *not why*).
- **Ensure the safety** of the child, youth, or vulnerable adult is not at risk from further harm and assess their needs for immediate assistance (e.g., medical assistance for serious injuries).
- **Support** the individual by discussing next steps and helping him/her connect to the Ethics & Safeguarding focal point or other immediate assistance as needed. You must:
 - Explain that all *AIDE* staff and people connected to the organization are required to make a report when they become aware of a complaint or concern. *Reassure them that all information will be kept private and only shared on a need-to-know basis.*
 - Report to the appropriate staff member (see below)

Reporting safeguarding concerns

AIDE will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities with whom we work.

As outlined in the Code of Conduct, *AIDE* urges staff and affiliates to report any suspected safeguarding violations **without fear of retribution**. If an affiliate is uncomfortable reporting activity he/she believes to be improper through the reporting structure outlined below, or is not satisfied with the response received, such concerns may be reported on a confidential basis directly to the HR Department or Labor Commission..

AIDE will also accept complaints from external sources such as members of the public, partners, and official bodies. *AIDE* will also ensure there is a confidential feedback mechanism (e.g., a comment/complaint box) available for children, youth, and vulnerable adults who may not be comfortable voicing their concerns aloud to *AIDE* affiliates.

How to report a safeguarding concern:

- Report all safeguarding and child protection concerns immediately, within no more than 24 hours, to the Ethics & Safeguarding focal point or to supervisor, senior management, or any member of the HR department. That person is instructed to report to HR who will move forward with all follow-on actions and communication, as dictated in *AIDE*'s Investigation Guidelines. *If you are not comfortable reporting to these staff members (for example, if you feel your report won't be taken seriously or if that person is implicated in the concern) you may report to HR, or the Head of the Institution.*
- Ensure confidentiality is respected throughout, particularly that of the child, youth, or vulnerable adult and the alleged perpetrator, to ensure the vulnerable person is placed at no further risk of or actual harm. Information should only be shared on a need-to-know basis.
- *AIDE* staff, affiliates and partners also have a responsibility to report external cases of abuse of vulnerable people, either to the Ethics & Safeguarding focal point for advice or to the relevant authorities.
- Ensure the child, youth, or vulnerable person is safe and receives necessary medical attention if they are suffering from a serious injury.

Note: Training on what to do and what not to do if a child, youth, or vulnerable adult makes a disclosure, will be included in Safeguarding & Child Protection Training.

Response to Safeguarding Concerns

All incidents will be investigated and remain confidential, with information shared only on a need-to-know basis. This is essential to ensure both the child, youth, or vulnerable adult and alleged perpetrator are not placed at risk of harm, and to prevent the spread of misinformation or falsehoods.

AIDE must ensure appropriate psychological first aid to the child, youth, or vulnerable adult and persons involved, provided by the Ethics & Safeguarding Focal Point. *AIDE* will also ensure no further harm to the child, youth, or vulnerable person during the investigation, by interviewing them only once to minimize further traumatization and distress and by ensuring the interviewer is trained in age- and developmentally- appropriate interviewing techniques for survivors of abuse. *AIDE* will also ensure that the child, youth, or vulnerable adult and persons involved take part in decisions concerning them, according to their age and level of maturity.

If found to be in breach of the *AIDE* Safeguarding & Child Protection Policy, *AIDE* will take any action deemed necessary, including:

- **Disciplinary actions**, which may include performance management processes, dismissal or criminal investigations conducted by appropriate authorities externally (if the allegation is of a criminal nature).
- **Providing assistance for the victim** and taking immediate steps to protect and support the child, youth, vulnerable adult, or other persons involved, as appropriate.
- **Preventing that such incidents do not occur again**, for example, by implementing corrective actions and reviewing the safeguarding policy and guidelines to prevent future incidents.

Confidentiality

Confidentiality must be maintained during all stages of the disclosure and reporting process. The name of the child/ren, youth, or vulnerable adult associated with the allegation of abuse, in addition to details of the allegation itself, as well as the identity of the alleged perpetrator of abuse, will be kept confidential to the highest possible degree. Any breach in confidentiality could have serious repercussions for both the vulnerable person, and the alleged perpetrator and his/her organization including threats, reprisals and attacks, and reputational damage.

All reports/ records will be documented in a secure, locked, and fireproof place with limited access. If sent via email, the Incident/ Concern Reporting Form should be sent in a password protected file, with the password sent via phone to ensure a greater level of security, to the HR Manager/ Ethics & Safeguarding Focal Point. Ethics & Safeguarding focal points will maintain incident logs in a secure database maintained by HR. Information will only be shared on a need to know basis to relevant parties.

1.6 Policy modifications and review

Modifications: *AIDE* is committed to continuously reviewing and updating our policies and procedures. Therefore, this Safeguarding Policy and Guidelines is subject to modification as required to respond and adapt to changing circumstances. Any amendment or waiver of any provision must be approved by the VP HR & Admin.

Self-Audit: *AIDE* should conduct a self-audit every two years, involving all relevant staff. The aim of an audit is to review and provide a snapshot of what *AIDE* are doing to keep children, youth, and vulnerable adults safe, how well we are doing it, the levels of awareness of safeguarding measures within *AIDE*, and what safeguarding improvements we need to focus on. Suggested updates to policy and procedures will be reviewed after every audit.