



Accountability Policy

1. Introduction

Three Wishes' Accountability policy is one of its four safeguarding standards, the others being Safeguarding, People and Partnerships and Risk Management. Each standard has policies within them. Together, they represent a comprehensive safeguarding framework. Three Wishes' policies are available on its website.

Our work is guided and supported by a safeguarding framework which is made up of a number of policies and which is consistent with professional best practice, compliant with the law and relevant regulations, and which reflects the nature of our work. Our intention is to promote the development of a safeguarding culture that prioritises the safety and well-being of our staff¹ and beneficiaries and those who come into contact with us through our work.

Typically, 'accountability' is defined as *'the quality or state of being accountable; an obligation or willingness to accept responsibility for one's actions'*². Three Wishes believes that implementing robust standards for accountability using effective controls and oversight contributes to foster good safeguarding practice.

Just as Three Wishes recognises and accepts its responsibility to account upwards – for example to its donors, supporters, and the general public via the Charity Commission – we also recognise that we are accountable to the communities we support through the work that we fund through our partners, and that this can only be realised if beneficiaries are engaged in a dialogue with those who work to support them.

We therefore require our partners to engage with and support the development of community safeguarding structures, where this is appropriate, and to support and facilitate the inclusion of beneficiaries in safeguarding work that is done in their name. This is explained in more detail below.

Three Wishes also commits to monitor and review all elements of our safeguarding standards to ensure both upward and downward accountability.

2. Purpose

This accountability policy is to ensure that:

1. Lines of safeguarding accountability are clear to all Three Wishes' stakeholders.
2. Learning from practical case experience is used to inform and improve Three Wishes' suite of safeguarding standards and policies.
3. Regular internal reviews are carried out, lessons are learnt, and appropriate action is taken.

3. Positive Governance and Accountability

We regard accountability as a mutually reinforcing dynamic, comprising, on the one hand, system change and improvement that is driven by accountability to the people being served, and, on the other, by enabling the empowerment of the people being served to take increasing ownership of their own change. This is of fundamental importance to challenge the systemic imbalance within traditional models of humanitarian assistance.

4. Upward safeguarding accountability

Upward accountability is the relationship between charities and their donors, governing bodies and regulatory bodies. It reflects a set of obligations by charities to report and to be held accountable.

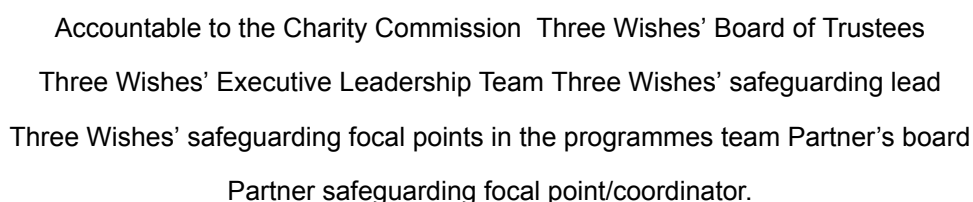
¹ Staff: Employees and trustees, freelance workers (self-employed and agency staff); volunteers, interns and secondees.

² Webster's dictionary definition of "Accountability".

Three Wishes funds the work of partners. It ensures that clear lines of reporting and accountability are in place to ensure that safeguarding incidents are dealt with appropriately, and that the procedures set out in Three Wishes' safeguarding framework are followed.

5. Procedures for upward safeguarding accountability

The chart below illustrates the reporting line from our implementing partners through Three Wishes' safeguarding focal points, safeguarding lead and to the board of trustees' responsibility to the Charity Commission.



Three Wishes' executive leadership team ensures that Three Wishes' donors are informed of any safeguarding concerns reported to us. The Board of Trustees is responsible for reporting to the Charity Commission.

6. Accountability of Three Wishes

Three Wishes' Safeguarding Lead will report all safeguarding matters to the designated trustee at board level. Three Wishes' trustee with designated safeguarding responsibilities is responsible for ensuring that the Three Wishes board of trustees is fully informed of the situation and will recommend the appropriate course of action to it. Three Wishes will independently report to its donors any safeguarding incident that it determines is a reportable serious incident, or which the Three Wishes' board otherwise determines should be notified to donors.

At the operational level, Three Wishes' Executive Leadership Team (ELT), through its Safeguarding Lead is responsible for ensuring a working environment and culture conducive to the implementation of all aspects of its safeguarding framework standards. The implementation strategy of Three Wishes' safeguarding framework and subsequent reviews will be presented by the ELT to the Three Wishes board of trustees for approval.

Three Wishes' Safeguarding Lead is accountable for identifying the training, support and resource required to implement Three Wishes' safeguarding framework effectively and for reporting on this to the Executive Leadership Team for its consideration. This will include ensuring that staff are appropriately trained in conducting thorough due diligence of potential partners, ensuring memoranda of understanding (MOUs) between Three Wishes and partners reflect safeguarding responsibilities and consequences for non-compliance, and ensuring that Three Wishes' monitoring and evaluation frameworks incorporate safeguarding. The trustees will ensure that partner agreements reflect safeguarding responsibilities and consequences for non-compliance.

The ELT is responsible for earmarking or securing adequate resources in relation to the effective implementation of the safeguarding framework and any further strategy in relationship to safeguarding set by the board. The ELT will ensure that the Safeguarding Lead delegates responsibility for implementing the safeguarding framework to appropriate members of staff within Three Wishes, including country level safeguarding focal points.

All managers are accountable for ensuring that all staff under their supervision have received safeguarding training and that safeguarding is a standing agenda item in all supervision meetings. All staff are accountable for following the procedures for reporting safeguarding concerns, making appropriate records, and observing the code of conduct expectations.

The Director of Programmes is responsible for ensuring that partners are assessed in accordance with Three Wishes' due diligence framework and are adequately trained and resourced to fulfil their safeguarding obligations, and that a capacity building package is in place if needed and if resources are available.

The role and responsibilities of our key safeguarding officers can be seen in **Schedule 1**.

7. Bottom-up safeguarding accountability

Bottom-up accountability refers to processes by which organisations are held accountable by the communities they support. Bottom-up accountability is characterised by a more complex dynamic of relationships between charities, their implementing partners, and the beneficiaries/communities whom they support.

Three Wishes recognises the complexity of this relationship. It commits to transparent engagement with partners based on an agenda of common purpose built on mutual trust, designed to enable the achievement of agreed contractual outcomes determined in the partnership agreement.

Moreover, we believe that an informed, empowered and engaged community is fundamental to a meaningful safeguarding accountability structure. Whilst the reporting process remains 'bottom up', i.e., from the community to the Charity Commission, the process depends upon the engagement of an informed and empowered beneficiary community. Three Wishes recognises that many of our beneficiaries are often vulnerable, transitory, and disempowered and that this exposes them to significant safeguarding risks. We also acknowledge problems of delivering genuine, sustained community engagement for us and our downstream partners.

Notwithstanding this, we require our implementing partners to embrace and deliver the principle of community engagement with the people they support. Requirements are situation dependent and to be agreed by Three Wishes and each partner. For example, where Three Wishes grant funds to its partners to engage in community development work, we require partners to demonstrate a community engagement strategy, details of which may be seen in the People and Partnership policy. For those whom we fund via payment of receipts – i.e., where we pay for the one-off supplies or services – we require our partners to:

- Provide evidence of a needs-assessment process and the nature and degree of engagement of the community in this process.
- Evidence of a priority beneficiary selection process.
- Provide receipts and to account for expenditure in an agreed fashion.
- Monitor the success of the distribution of goods and services and to share findings with Three Wishes.

Three Wishes' support for the capacity strengthening of our implementing partners and the partners' work with beneficiary communities will be determined following the findings of a due diligence assessment.

8. Procedures for bottom-up safeguarding accountability



8.1 Monitoring and Lesson Learning

Three Wishes monitors our compliance with the safeguarding framework, and the safeguarding practices of our partners, in a number of ways:

- We will apply our safer recruitment policies and train our staff appropriately and we expect the same from our partners.
- Three Wishes' Programmes team will monitor partners' compliance with the safeguarding standards that have been agreed with us.
- Three Wishes will schedule meetings with beneficiaries and their representatives during monitoring visits.
- Three Wishes will undertake periodic reviews of partners' compliance with safeguarding standards.
- A safeguarding update will be included in all scheduled reports by Three Wishes to its trustees.
- Three Wishes will review annually its safeguarding standards and associated policies and present them for approval to the trustees of Three Wishes.

Schedule 1: Designated Officers Roles and Responsibilities

1. Three Wishes Safeguarding Lead Board

1.1 Trustee Role and Responsibilities

1.1.1 Role

The Three Wishes board trustee with responsibility for safeguarding assumes three main sets of duties related to safeguarding in addition to their wider responsibilities as a board trustee.

1.1.2 Responsibilities

1.1.2.1 Strategic

- Consider the organisation's strategic plans and make sure they reflect safeguarding legislation, regulations specific to Three Wishes activities, statutory guidance, and the safeguarding expectations of the Charities Commission.
- Work with the Safeguarding Lead to regularly review whether the measures the organisation has put in place are creating a safer culture and keeping people safe.
- Check the organisation's risk matrix reflects safeguarding risks properly and plans sensible measures to take, including relevant insurance for trustees' liability.
- Make sure there is space on the agenda for safeguarding reports and help the trustees understand and challenge those reports.

1.1.2.2 Effective policy and practice

- Make sure there is an annual review of safeguarding policies and procedures and that this is reported to the board of trustees.
- Oversee the monitoring that Three Wishes has in place to see whether policies and procedures are effective.
- Call for audits of qualitative and quantitative data (either internal or external) when they are needed.
- Ensure that the learning from case reviews locally and nationally, is incorporated to improve Three Wishes' policies, procedures, and practices.
- Oversee safeguarding allegations against staff or volunteers, together with the Safeguarding Lead.
- Be a point of contact for staff, volunteers, or partners if someone wishes to complain about a lack of action in relation to safeguarding concerns.

1.2.2.3 Creating the right culture

- Champion safeguarding throughout the organisation.
- Attend relevant safeguarding training events and conferences.
- Support the trustees in developing their individual and collective understanding of safeguarding.
- Attend meetings, activities, projects to engage with staff, volunteers, and beneficiaries to understand safeguarding on the ground.

- Work with the chair, the ELT, the Safeguarding Lead, and communications team in order to manage all serious safeguarding cases.
- Report serious incidents to donors as required.
- Support regular safeguarding updates for staff, volunteers, and beneficiaries.
- Identify ways of gathering the views of staff, volunteers, and partners in relation to safeguarding and share these with the board.

1.1.2 Support from the chair

The chair of the board of trustees should make sure that the trustee with safeguarding responsibility has the required knowledge, skills, and experience or is supported to develop these.

This can include:

- Setting up regular meetings together with the trustee for safeguarding responsibility, and the designated safeguarding lead.
- Making sure the trustee with safeguarding responsibility is allocated enough time at meetings to provide full and detailed reports on safeguarding.
- Encouraging the trustee with safeguarding responsibility to take part in local and national partnerships that can help them keep up to date with safeguarding messages, trends, and priorities.

2. Safeguarding Lead

The Safeguarding Lead acts as the main source of support, advice, and expertise for safeguarding at Three Wishes. The Safeguarding Lead advises and supports the Executive Leadership team in developing and establishing Three Wishes' approach to safeguarding. This should be explicit in the role-holder's job description described below in the broad areas of responsibility and activities related to the role.

2.1 Key Responsibilities:

- Play a lead role in maintaining and reviewing Three Wishes' strategy for safeguarding.
- Coordinate the distribution of policies, procedures, and safeguarding resources throughout Three Wishes.
- Ensure safeguarding is integrated in key operational processes, partner due diligence, monitoring, evaluation.
- Advise on training needs and development, providing/facilitating training where appropriate.
- Report all serious safeguarding incidents to the trustee with safeguarding responsibilities and agree process for managing these.
- Provide safeguarding advice and support to focal points, staff, and volunteers.
- Manage safeguarding concerns, allegations or incidents reported to Three Wishes.
- Advise/support HR with any investigation of safeguarding allegations involving Three Wishes personnel.

- Liaise with HR to facilitate support for Three Wishes staff who are victim/survivors including sign posting to appropriate services.
- Facilitate support for partner capacity building and investigation of safeguarding concerns where appropriate.
- Manage referrals to key safeguarding agencies (e.g., social services or police) of any incidents or allegations of abuse and harm.
- Provide regular reports of safeguarding activity for the board of trustees.

The Safeguarding Lead should be given the time, funding, training, resources, and support to provide advice and support to other staff on safeguarding matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so and to conduct safeguarding investigations where appropriate.

3. Human Resource Team

The human resource team is responsible for ensuring appropriate systems and processes are in place for safer recruitment and supporting the safeguarding lead in implementing and managing safeguarding.

- Ensure appropriate systems and processes are in place to support safer recruitment.
- Together with the safeguarding lead ensure all staff and volunteers receive safeguarding training and sign the organisation's code of conduct.
- Provide/sign post staff and volunteers to sources of support to maintain well-being.
- Support the safeguarding lead to manage safeguarding allegations against staff and volunteers.
- Facilitate the provision of support to any victim making a report and to the person against whom an allegation has been made.
- Facilitate the alleged victim to access psychosocial support.
- Facilitate/conduct an internal safeguarding investigation with the safeguarding lead where necessary.
- Maintain proper records on all cases referred to him/her in a secure and confidential manner.
- Keep up to date on current developments regarding provision, practice, support services, legal obligations/requirements, and policy. This will include attending safeguarding training.

4. The Safeguarding Focal Point's Role - Three Wishes Programmes Team

Our Programmes team, by virtue of having a close working relationship with our partners, are most likely to receive initial safeguarding disclosures from staff and volunteers of our partners, beneficiaries, or other concerned parties. With this in mind we require each regional team to have one person allocated as a Safeguarding Focal point. This role will involve additional responsibilities highlighted below and will be supported by Three Wishes' Safeguarding Lead.

4.1 Key Responsibilities

- Coordinate the implementation of Three Wishes' safeguarding framework in the country in which you are working / responsible for with your respective team members.

- Ensure that Three Wishes' safeguarding framework, including reporting pathways for raising concerns, is visible for team members at country offices/workspaces being used.
- Be a first point of contact for implementing partners, staff, and volunteers to refer safeguarding concerns or complaints and document all concerns.
- Report all safeguarding concerns to Three Wishes' Safeguarding Lead for further support.
- Store safeguarding records in a secure place.
- Refer all media queries in relation to safeguarding to the Safeguarding Lead (via safeguarding@3wishes.org).
- Signpost implementing partners to safeguard resources and training in consultation with the safeguarding lead.
- Provide logistical support for in-country safeguarding investigations, related to Three Wishes staff.
- Engage communities and partners in the implementation of appropriate reporting mechanisms between Three Wishes, beneficiaries, and the grantee.
- Support programmes officers with safeguarding compliance for partners.
- Meet with the Safeguarding Lead on a monthly basis to share specific safeguarding issues and highlight any support required.

In addition to the mandatory safeguarding annual refresher training that will be delivered to all Three Wishes employees, the safeguarding focal point will receive additional training for working in their specific context, as well as training for implementing security and risk management planning.

The safeguarding focal point is accountable to the Safeguarding Lead for their safeguarding responsibilities.

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Next Review: August 2027