



## Safeguarding policy

<b>Owner</b>	Foundation for Labour and Employment Promotion
<b>Version</b>	1
<b>Approved by FLEP Board</b>	May 23 <sup>rd</sup> , 2024
<b>Review Schedule</b>	Biannually

This safeguarding policy sets out FLEP's approach to preventing and reducing harm to adults at risk and children when they are in contact with members of the FLEP Staff.

The policy aims to:

- Promote and prioritize the safety and wellbeing of adults at risk and children.
- Provide assurance to parents, caregivers, and other parties that FLEP takes reasonable steps to manage risks and keep adults at risk and children safe.
- Ensure that everyone understands their roles and responsibilities in respect of safeguarding and is provided with the necessary information, training, and support on safeguarding matters.
- Prevent the employment of individuals in work with adults at risk and/or children where they have been barred from such work or are deemed by FLEP to pose an unacceptable risk to vulnerable groups.
- Ensure that appropriate action is taken in the event of any allegations or suspicions regarding harm to adults at risk or children arising from contact with members of the FLEP Team.

The Safeguarding Policy also seeks to manage effectively the risks associated with activities and events involving adults at risk and children by:

- Integrating safeguarding reviews into the biannual FLEP risk assessment process, which involves identifying risks to FLEP and means of reducing or eliminating these.
- Implementing the required actions identified by the FLEP risk assessment process and reviewing the effectiveness of these on a regular basis.
- Ensuring that the appropriate basic disclosure checks are conducted, depending on eligibility, for any individuals starting or moving into work which involves working with adults at risk and/or children.
- Requiring new FLEP staff involved in working with adults at risk and/or children to familiarize themselves with the content of this policy.



This policy requires that any suspicions and allegations involving harm to adults at risk or children are referred to the FLEP Board to determine what action, if any, must be taken. This will enable each situation to be investigated thoroughly, whilst treating the parties involved fairly and with sensitivity. It will also ensure that suitable steps are taken because of any investigations, which may include contacting the police and/or fulfilling the legal duty to refer information to the relevant local authorities as required. The procedure for managing suspicions and allegations aims to strike a balance between the need to protect adults at risk and children from abuse and the need to protect FLEP staff from false allegations.

## **1. Application and definitions**

This safeguarding policy sets out FLEP's approach to preventing and reducing harm to adults at risk and children when they are in contact with members of the FLEP staff.

- Harm is understood to include violence and threats of violence, as well as exploitation and harassment.
- A child is any person under the age of 18. FLEP does not typically work with children, but there may occasionally be circumstances where the children of informal workers are involved in or present during FLEP activities.

FLEP staff may encounter children and adults at risk in a wide range of situations. These include, but are not limited to:

- Field visits, particularly to workers' homes and communities
- Workshops or training requiring travel and/or overnight accommodation
- Group delegations to regional and global forums

This policy applies whenever there is direct unsupervised contact between FLEP staff. As far as possible without endangering the quality of work, individuals are asked to not have direct unsupervised contact with adults at risk or children while carrying out their FLEP work, unless it is clearly necessary (e.g. an informal worker leader request a private meeting). In most cases, FLEP expects that its representatives will conduct work in groups of 2 or more people. FLEP staff are advised against such activities as private late-night conversations during events – in these instances, multiple FLEP people (at least 2) should be present.



## **2. Focal Point**

The FLEP Focal Point for all safeguarding issues and concerns, including interpretation and application of this policy and related FLEP policies, is the FLEP Director.

## **3. Awareness of Policy**

All FLEP staff will be asked to sign that they have received a copy of, and read and understood the terms of, the FLEP Safeguarding Policy for Adults at risk and Children when they sign their initial contracts. FLEP staff will be reminded of the policy provisions at the annual FLEP Team Retreat, with time provided for questions on policy application and adherence.

## **4. Assessment Process**

- 4.1 The risk assessment is a formal discussion conducted by the FLEP staff directly responsible for the planned activity. The purpose of the risk assessment process is to enable FLEP to identify, mitigate and remove any potential risks relating to contact with adults at risk and/or children.
- 4.2 It can also be prompt to consider alternative working practices, such as minimizing occasions where an individual is alone with a child or vulnerable adult and considering whether the activity could be supervised or observed by others.

## **5. Screening Check Process**

Once the key duties and responsibilities of a position are determined and employment contract are finalized, one of the required actions must be to identify which screening checks,

- 5.1 To consider if any required checks should be treated as essential before employment to the individual working directly with adults at risk and/or children
- 5.2 To consider if the new person recruited to the role should not be able to start work until the check is completed

For positions identified as requiring unsupervised direct contact with adults at risk and/or children, appropriate screening and checks must be completed. The closest international equivalent is a police certificate of the kind typically required for immigration purposes – this is known in many countries as a criminal record check. The requirements for such a screening check should be indicated in the employment contract, with successful candidates asked to provide proper relevant screening documentation (e.g. a police certificate) at their own cost before an employment contract is signed.



## **6. Reporting Mechanism**

Concerns for the safety and wellbeing of adults at risk and/or children could arise in a variety of ways and in a range of situations. For example, an adult at risk or child may report or show signs of abuse, someone may hint that a vulnerable adult or child is at risk, or someone may witness abuse or harm

- 6.1 It is important that the recipient of any complaint or accusation that a vulnerable adult or child has been or is being abused/harmed listens carefully without making or implying any judgment as to the truth of the complaint or accusation.
- 6.2 To ensure that all the details of an allegation are captured for any future investigation, a detailed record should always be made at the time of the matter being raised.
- 6.3 It is impossible to promise complete confidentiality when a concern is raised, or an accusation made. This is because FLEP owes a duty of care to its staff that cannot be fulfilled unless FLEP acts based on information that may have been provided in confidence. The duty of confidentiality must be weighed against the duty of care, in case of potential or actual harm to an individual. However, at all stages, only those people who need to be made aware of an incident or concern, whether internal or external to FLEP, should be informed.
- 6.4 Where an individual suspects or is informed that an adult at risk or child has been, is being or could be harmed because of taking part in a FLEP activity/event or through contact with FLEP staff, it is not the responsibility of that person to decide whether abuse or harm has taken place. Instead, the individual aware of these suspicions or allegations must contact the FLEP Director immediately for guidance and assistance with the action that must be taken. If circumstances make this impossible, the Chairperson of FLEP must be contacted.

When a complaint of abuse or harm is reported, the FLEP Director will carefully consider the information available and decide on the appropriate course of action in line with this policy, and the procedure for raising grievances.



## **7. Data Protection**

7.1 All risk assessment documentation, records of relevant discussions and/or rainings, personnel files, criminal record checks or other screenings, and any documentation regarding allegations of abuse or harm must be retained for a minimum of five years after the individuals concerned have left FLEP.

7.2 Information about any allegations or suspicions of abuse or harm must be shared on a need-to-know basis only.

7.3 Documentation related to allegations or suspicions must be stored in a secure place which is only accessible to those with appropriate knowledge of the suspicions/allegations.

7.4 Where it is necessary for anyone contracted by FLEP to take photographs or video images of children, written consent must be obtained from parents before these images are taken. Written consent forms, or other formal means of consent (e.g. witnessed verbal agreement), should also be obtained from adult informal workers for the use of photos and videos containing their images. FLEP staff should not take photos of adults at risk and/or children without first explaining their prospective use and seeking consent, as noted above. This includes photos taken on personal cameras or smartphones.

## **8. Roles and Responsibilities**

The FLEP Director was designated as a safeguarding person. As such, s/he takes overall ownership of the policy and will promote the importance of safeguarding within FLEP.

It is the responsibility of the FLEP staff leading on the recruitment of a position, or the implementation of any activity or event which involves directly working with adults at risk and/or children to:

- 8.1 Identify if and where the safeguarding procedure is applicable to a particular role, activity, or event.
- 8.2 Ensure that any FLEP staff working with adults at risk and children is familiar with the contents of the policy and its application before any new or substantially changed activity/event.
- 8.3 Ensure implementation and review of any actions identified as necessary during the risk assessment.
- 8.4 Identify whether individuals recruited or involved in an activity or event require a formal screening, and, where applicable, ensure that this is carried out in accordance with FLEP procedures. All FLEP staff working directly with adults at risk and children should be familiar with this policy.



Every individual who becomes aware of any suspicions or allegations regarding harm to adults at risk and/or children is required to report this immediately, as laid out under the Reporting section of this policy.

## **9. Policy Ownership and Status**

The Safeguarding Policy is owned by FLEP. It will be biannually periodically reviewed and updated, in consultation with the FLEP Board to ensure compliance with relevant legislation and internal changes.

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