



Safeguarding Policy

Introduction

Embrace is committed (a) to ensuring that all possible steps are taken to prevent abuse, exploitation or harm occurring to any child or adult at risk with whom we have a connection and (b) to acting promptly and appropriately when a concern is raised or identified.

This policy provides guidance to all Embrace staff, trustees, volunteers and supporters on issues to do with the well-being and safeguarding of all with whom we come into contact, and especially any children and adults at risk. In order to ensure that we meet best practice standards, including in the development of this policy and associated codes of conduct and reporting procedures, Embrace the Middle East is an associate member of Keeping Children Safe. We also benefit from the advice and support of Thirtyone: eight (formerly CCPAS).

The policy covers the measures required to prevent harm to children and adults at risk and the steps which we will take should harm be suspected, witnessed or reported. Notwithstanding that our ability to control the activities of overseas partners is limited we are committed to working with partners to improve and maintain safeguarding procedures and to protect and promote the well-being of their beneficiaries at all times.

Definitions

The WHO provides the following definition, which while referring specifically to children can equally be applied to adults at risk:

'Child maltreatment, sometimes referred to as child abuse and neglect, includes all forms of physical and emotional ill-treatment, sexual abuse, neglect, and exploitation that results in actual or potential harm to the child's health, development or dignity. Within this broad definition, five subtypes can be distinguished – physical abuse; sexual abuse; neglect and negligent treatment; emotional abuse; and exploitation.'¹

A more detailed explanation of the five subtypes can be found in **Appendix 1**.

For the purposes of this policy:

- 'child' refers to those under the age of 18 years, in accordance with the United Nations Convention on the Rights of the Child.
- Adults at risk refer to those aged 18 years or over; Who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. This definition is taken from The Care Act 2014

The policy is split into three main sections:

- Awareness
- Prevention
- Reporting & Response

¹ http://www.who.int/topics/child_abuse/en/

Awareness

Embrace will equip all representatives of the charity to understand their safeguarding responsibilities and obligations under this policy:

Training & Development

- Employees, trustees and volunteers will receive appropriate training in safeguarding awareness and related issues as related to their role at least once every two years.
- Employees who have access to personal information about the children and adults at risk at the projects with which we work will be trained in, and become fully conversant, with data protection guidelines and practices regarding the confidentiality of such information (see Embrace the Middle East's data security and acceptable use policies).
- Employee adherence to these safeguarding and data protection guidelines and practices is the responsibility of all staff, with the safeguarding officer, also Chair of the Safeguarding Committee, providing overall leadership within the charity for best practice, and assuming responsibility, with the support of the CEO and SLT, for monitoring compliance.
- The CEO is responsible to the trustees for ensuring that all Embrace policies and practices support and facilitate the charity's safeguarding priorities and practice as set out in this policy.

Prevention

Management

- The chair of the charity's Safeguarding Committee is the designated safeguarding officer. The deputy chair is her/his second. She/he, supported by, and reporting to, the CEO, is responsible for overseeing the implementation of this safeguarding policy.
- All Embrace staff, trustees and volunteers will be made aware that they can talk to the safeguarding officer, or any member of the Safeguarding Committee, about safeguarding issues (or to the CEO if concerns relate to the safeguarding officer).
- The trustees of Embrace have the responsibility of assuring themselves that issues related to the protection of children and adults at risk are adequately managed and that appropriate safeguards and procedures are in place.

Recruitment processes

1. Self-declaration forms will be required from all new employees and volunteers prior to recruitment, and renewed every three years.
2. All roles, paid or unpaid, with access to beneficiaries or beneficiary records and/or children and adults at risk will be required to undergo an appropriate DBS or basic disclosure check at the point of recruitment. This will include:
 - CEO & Directors
 - HR manager
 - Programmes and Partnerships Managers
 - Regional Managers
 - Supporter care manager
 - Supporter care administrators

3. The appropriate level at which UK citizens can be checked is defined by law and Embrace will always apply for the highest level of legally obtainable check as advised by its disclosure check providers. These checks will be completed before any activity with or related to children or adults at risk is commenced and renewed in line with current guidance or a minimum of every three years, whichever is the lesser.

In addition to the above, on appointment and re-appointment all trustees will be required to undergo a standard level DBS check, or a basic disclosure if this is not possible.

4. All staff, trustees and volunteers of Embrace will be required to understand and, as proof of understanding, sign the charity's relevant Code of Conduct and Ethics, governing appropriate behaviours including a commitment to protect and uphold the dignity and safety of all people with whom they come into contact, at all times.

Overseas travel

All visitors to Embrace partners overseas are required to undergo a visit orientation prior to travel. This includes a dedicated section on Embrace's approach to safeguarding. Visitors must be familiar with our safeguarding and associated policies (e.g. Acceptable Use and Social Media policies) and sign an acknowledgement stating they have read, understood and will abide by these policies. They are also required to understand prior to travel, and as proof of understanding, sign a Code of Conduct undertaking to protect the dignity and safety of all peoples at all times and especially children (under the age of 18) and adults at risk. A range of prohibited behaviours are spelt out in the Code of Conduct.

In addition to these requirements overseas volunteers undertaking roles at facilities that support children and adults at risk will be checked at the highest level legally obtainable, as advised by the charity's safeguarding advisors.

Correspondence and record keeping

In the UK, we keep limited information about children and adults at risk for sponsorship purposes in both hard and soft copy format. Hard copies will be kept in cabinets which are locked when not in use. Soft copies are accessed via our database which is password protected. All information passed to sponsors will be edited to remove data, which could render a child or adult at risk contactable directly.

Marketing activities (including trading)

The use of photographs in any form of media is subject to prior permission having been granted by the beneficiary or a responsible adult. Unless specifically agreed, names of individuals will be changed to preserve anonymity. All communications will comply with our Communications about Children & Adults at risk guidelines (see **Appendix 2**)

We will ensure as far as possible that the goods sold in our catalogue are manufactured without the use of child labour and in conditions which meet with minimum welfare requirements.

Partner policies and procedures

Embrace requires all partners to have, or be working, with an agreed timeline, towards a written safeguarding policy which lays down the actions that will be taken if abuse is discovered. Where a partner's operations permit any kind of beneficiary access to the internet or e-mail, the partner must have a responsible use policy to include measures to

prevent children and adults at risk from exposure to inappropriate images or communication with other internet users.

Partners must demonstrate a commitment to the ongoing training, care and development of their staff in relation to safeguarding. Embrace, in conjunction with an internationally recognised safeguarding support adviser, will provide capacity building for partners to raise levels of child and adults at risk protection and safeguarding.

Embrace grant agreements for projects which involve child or other sponsorship state:

- The partner must not facilitate any meetings between sponsors and sponsored children.
- The partner must obtain parental permission for a child's personal information, including photographic images, to be passed on to sponsors, and then only following anonymisation.

We recognise that in each of the countries in which we work the laws relating to the welfare of children and adults at risk differ, as does the definition of vulnerability and the application of protective laws. Nevertheless, we encourage all our partners to put in place appropriate protection policies for their beneficiaries and require evidence of such policies, or steps in place to develop such policies, and the operational capacity and commitment to enforce them, before grant funding can be awarded.

Reporting & Response

All staff and representatives of Embrace are made aware of their responsibility to uphold this policy.

All staff and trustees are required to understand and commit to the charity's Code of Conduct and Ethics, including to protect and uphold the dignity and safety of all people with whom they come into contact, at all times. Separate codes of conduct must be agreed and signed by all volunteers and occasional visitors to Embrace Partners, who are accompanied at all times by a member of Embrace staff.

A safeguarding committee (see **Appendix 3**) will meet three times a year to monitor compliance with, and advise on improvements to the charity's Safeguarding Policy, and as required (where possible within 24 hours) to consider any allegations of abuse, disclosures or serious incident reports. Each team within the charity will have at least one representative (safeguarding focal point) serving as a member of the Committee. The Chair of the committee will be the charity's designated safeguarding officer.

If any member of staff or volunteer suspects abuse, or if a child, young person or adult at risk makes a disclosure, or if a person external to Embrace reports a suspicion or allegation relating to Embrace staff, volunteers or activities, including activities carried out in partnership with Embrace by other organisations, the following steps should be taken:

- Avoid any delay.
- Record what you have seen or heard using the Embrace Incident report form and/or Information gathering form.
- Pass the report to the designated safeguarding officer within 24 hours (if the safeguarding officer is implicated the CEO or Chair trustees for the Charity should be informed).

The designated safeguarding officer will see that the Safeguarding Committee meets as soon as possible (ideally within 24 hours) to consider the report. However, if urgent action is

required to protect children this should be done immediately. No staff member, trustee or volunteer will prejudice their own standing or position within Embrace by responsibly reporting potential or suspected abuse of a child or adult at risk.

Embrace will take prompt and appropriate action in response to all allegations or suspicions of abuse that come to its attention, in accordance with the procedures set out below:

1. Reported allegations or incidents will be brought to the attention of the safeguarding officer or members of the Safeguarding Committee (safeguarding focal points). If the safeguarding officer is implicated then the CEO or Chair of Trustees of the Charity should receive the report. If the CEO is implicated the Chair of the safeguarding Committee will report directly to the Chair or Deputy Chair of Trustees.
2. He/She will ensure that a record (Embrace Incident or Disclosure Form) of the nature and grounds of the allegation signed and dated by the person who is making the report has been completed. This document will form the basis of any consideration of follow-up action to be taken by the Safeguarding Committee. Any actions or decisions taken as a result of the allegation and the Committee's deliberations will be recorded and kept in a secure place.
3. Embrace's safeguarding officer will inform the police or social services of an abuse allegation or disclosure, where the allegation is found upon preliminary enquiry by the Committee to have possible substance.
4. Subsequent to this, Embrace's designated safeguarding officer will also inform the Chair of Trustees.
5. In the event of an employee, trustee or volunteer being implicated in the allegation, the chief executive officer or chair of trustees will take any interim disciplinary action necessary, pending the outcome of any police investigation.

Where suspicion of abuse at an Embrace supported project the following additional procedure will also be followed

1. Embrace's designated safeguarding officer will consult with the Director of Programmes and Partnerships or the Chief Executive.
2. The matter will then be raised with the principal or director of the project concerned, and if appropriate, with the local Board of Trustees, for further investigation and action, as necessary, at the local level.
3. The principal or director of the project, or a representative of the local Board of Trustees, would then be expected to inform Embrace of the outcome of the investigation within an agreed time-frame.

Supporting Policies

Other policies support and inform our safeguarding responses. These include but are not limited to:

- Codes of Conduct and Ethics
- Vulnerable Supporter Policy
- Acceptable Use policy
- Data Protection policy
- Whistleblowing Policy
- Staff Handbook

Policy prepared by:	Tim Livesey
Effective from:	December 2018
Policy approved by:	Board of Trustees
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Definitions

The WHO (World Health Organisation) distinguishes the abuse or maltreatment of a child under five into sub-categories. We will use these definitions which were agreed by the WHO in 1999:

- **Neglect.** The inattention or omission on the part of the caregiver to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes, or has a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.
- **Physical.** Physical abuse of a child is that which results in actual or potential physical harm from an interaction or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power, or trust. There may be single or repeated incidents.
- **Emotional.** Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential, and in the context of the society in which the child dwells. There may also be acts toward the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, patterns of belittling, denigrating, scape-goating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.
- **Sexual.** Child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to the inducement or coercion of a child to engage in any unlawful sexual activity; the exploitative use of a child in prostitution or other unlawful sexual practices; the exploitative use of children in pornographic performances and materials.
- **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 labour and child prostitution. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development.

Guidelines on Communications about Children & Adults at Risk

The following standards apply to all Embrace communications:

- Where it is necessary to use case studies to highlight the work of Embrace, names of children and adults at risk will be changed on collection of case studies.
- Within its fundraising and publicity materials, Embrace needs to use text and imagery from its partners. Embrace recognises that in doing so it has a responsibility to respect the rights of individuals at all times. Every individual has the right to be accurately represented through both words and imagery. Portrayal of individuals must not be manipulated or sensationalised in any way, but provide a balanced depiction of their life and circumstances. They must be presented as people with their own identity and dignity preserved. This applies equally to written, photographic and filmed materials.
- Where individuals are victims, their dignity must be preserved. Embrace will depict a balance between victimisation and empowerment by using tools such as 'before' and 'after' photos.
- People must, wherever possible, give their own accounts, rather than have others speak on their behalf. People's ability to take responsibility and action for themselves should be highlighted.
- Embrace will avoid the following:
 - Language and images that could possibly degrade or victimise or shame children and adults at risk.
 - Making generalisations which do not accurately reflect the nature of the situation.
 - Discrimination of any kind.
 - Using pictures out of context (these should be accompanied by an explanatory caption and be relevant to any accompanying text).
- In images, individuals should not be depicted in any poses that could be interpreted as sexually provocative.
- Partner and beneficiary delegated authority must be given before taking photographs, except under exceptional circumstances where this may not be possible or desirable.
- Embrace will acquire informed consent from the individual, the individual's guardian and/or the NGO responsible for the individual before using any image, experience or story for publicity, fundraising, awareness raising or other purpose. The purpose must be made clear to the consent giver.

Individuals or organisations that request the use of Embrace resources, such as photographs, will be required to sign an agreement with the organisation as to the proper use of such materials.

Terms of Reference for Safeguarding Committee and Focal Points

Constitution

The Safeguarding Committee and departmental focal points have been established by a resolution of Embrace the Middle East's Board of Trustees and will be known as the "Safeguarding Focal Points" (SFP) and "Safeguarding Committee".

Purpose

To identify and embed appropriate policies and procedures for Embrace the Middle East (Embrace) staff, trustees, volunteers and collaborating third parties in order to safeguard and promote the welfare, dignity and rights of all children, young people and adults at risk we encounter in every aspect of our work; as enshrined in the Human Rights Act 1998 and the 1989 United Nations Convention on the Rights of the Child.

Roles and Responsibilities

Safeguarding Focal Points (SFP)

Ultimate responsibility for safeguarding within Embrace rests with the Trustees. SFPs are appointed with the agreement of the Trustees (advised by the CEO) to receive and act as first responders in relation to any concerns raised within the organisation, or by third parties, relating to the possible abuse of a child or adult at risk or any related improper conduct, recording and responding to those concerns in accordance with Embrace's safeguarding policy. Each department will have an SFP within their team to ensure easy and timely communication of any concerns.

SFPs will:

- Act as a focal point to receive information about safeguarding concerns.
- Act appropriately to deal with those concerns, ensuring that all referrals of child and adult at risk concern or possible abuse are dealt with in accordance with standard procedure taking into account any relevant and appropriate age sensitivities.
- Ensure that all information is recorded on the incident/disclosure forms and where appropriate referred to the Safeguarding Committee within 24 hours.
- Provide overall support to the wider imbedding of policies and procedures to safeguard children and adults at risk within their teams.
- Upon receiving a concern or allegation of abuse they will implement the approved procedures, create a case file and convene the safeguarding committee if necessary. All original documents/records should be collected and placed in this case file. If it is not necessary to convene the committee then they will make a report on the incident at the next scheduled meeting.

Safeguarding Committee

The Safeguarding Committee will provide support to the charity's designated SFPs, advise the CEO and Trustees on all safeguarding policies and practices within the charity, and acting as the delegated authority ensuring that all safeguarding concerns and reports are acted upon in a timely manner in line with charity's policies, the Trustees responsibilities and all statutory guidelines.

Their role will be to:

- Lead on assessing safeguarding risks within the organisation, including its programmes, projects and partners. Where appropriate the committee may seek advice from third parties on the basis of relevant expertise and knowledge within the bounds of statutory confidentiality.
- Consult with local agencies whenever necessary and gather up-to-date information about service provision.
- Ensure that referral pathways for safeguarding responses are up to date and fit for purpose.
- To decide the correct course of follow-up action when safeguarding reports are made including:
 - Reporting to local or other relevant external authorities if the matter is criminal in nature.
 - If needed, identifying a plan of action which may include support services to the victim(s) and their families.
 - Appointing and delegating the investigation to an Investigating Officer if the matter is in breach of Embrace's Policy and therefore requires further investigation. Alternatively an investigation may be carried out by an external agency.
 - Monitoring the progress of the investigation and providing guidance as appropriate. Any report should be completed within 3 weeks and fed back to relevant parties and to the Trustees.
 - Liaising with F&M and CEO to decide if a press release is necessary and if so then consult on its contents.
 - Making recommendations arising from the outcome of the investigation and based on what is in the best interest of the victim(s).
 - Log the complaint and follow the correct reporting procedures.
 - Hold all records and information regarding safeguarding concerns in accordance with the law and GDPR.
 - Disclose concerns (if legally permitted) to prospective employer(s) or organisations that may engage the alleged perpetrator in the event that they are discharged for breaching this or any other policy.
- Committee members must disclose any potential conflict(s) of interest with regard to any safeguarding concern, or report, prior to the committee convening for a review.

If the committee makes a referral to statutory services in the UK, they should implement the following procedure:

- If the child or adult at risk in question is deemed to be at immediate risk contact the emergency services.
- Make a child or adult at risk protection referral to the statutory services <https://www.bucksfamilyinfo.org/kb5/buckinghamshire/fsd/service.page?id=VLifPWe7Yul> (Buckinghamshire – if it relates to an offense in another county contact that local authority)
- Follow the advice from the statutory services, place a written record of these consultations in the case file.
- Request in writing a receipt from the statutory services of the referral and request to be kept informed of their progress.
- If a concern refers to member of staff, volunteer or is the result of failed policy implementation an internal investigation should be conducted.

Membership & Appointment

The Chair of the committee will be an SFP appointed by the Trustees (advised by the CEO) and will act as the safeguarding “*named person*” for Embrace. The Vice Chair will act as the “*named person’s*” deputy. In the event of the relevant team SFP being unavailable incidents should be reported directly to the Chair of the Safeguarding Committee. All SFPs will sit on the Safeguarding Committee for the duration of their service.

Attendance and frequency of meetings

For the purposes of decision making, a quorum is 3 people.
The committee will meet three times per year.
The committee will also convene as necessary in the event of a concern or safeguarding incident occurring.

Agenda and Papers

Where possible, the agenda and papers will be issued to members one week before the meeting.

Reporting/Accountability

The committee will report to the Board of Trustees six monthly with the following information:

- The number of concerns raised or incidents reported in the preceding period
- Any referrals made to statutory or emergency services
- Any action points or improvements regarding current policy or procedures.

Action points from each meeting of the committee will be made available to relevant parties.

Membership of Safeguarding Committee:

1 x Finance representative
1 x IT representative
1 x P&P representative
2 x F&M representative