



FEI SAFEGUARDING POLICY

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Date agreed: October 2022

Date to be reviewed: October 2024 - * Updates must be made in line with any expansion of FEIs activities that would involve increased interaction with individuals that may be at risk of harm.

FEI is committed to safeguarding our wider community, any volunteers and our staff, as every adult and child should be safe from harm including abuse, injury and neglect. We have a responsibility to take action if we know, or suspect, an individual is at risk of harm.

Purpose

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries, from any harm that may be caused due to their coming into contact with Face Equality International. This includes harm arising from:

- The conduct of staff or personnel associated with FEI
- The design and implementation of FEI's activities

Glossary of Terms

Child

A person below the age of 18

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding



In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care 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.

Examples of abuse:

- Physical



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- Domestic
- Psychological/emotional
- Financial/material
- Modern slavery
- Discriminatory
- Organisational or institutional
- Neglect or acts of omission
- Self-neglect

FEI will always appoint a Trustee with designated responsibility (currently Charlotte Venter) and the relevant training to be the Safeguarding Lead.

Charlotte's professional role as a Headteacher of a high school means that she is most suited to being the Trustee responsible for Safeguarding, with the CEO as the secondary.

REPORTING

Any concerns about welfare must be raised with the Safeguarding lead for any involved partner organisation and/or the lead Trustee for consultation as appropriate. Staff members and volunteers of FEI should not take action before discussing next steps unless in very rare cases where urgent intervention is required to prevent significant harm, such as calling the emergency services.

Any allegations of abuse against a member of FEI staff or volunteer should also be reported immediately to the Safeguarding Lead Trustee. It is imperative that all staff and volunteers are aware of their duty to report any allegations or suspicions of abuse as soon as is reasonably possible, which will usually be within 24 hours.

DIGITAL SAFEGUARDING

The majority of FEI's current activity and engagement with individuals is online.

We have a responsibility to protect and promote the safety and wellbeing of members of our community, including through our online presence. Digital safeguarding means: 'the protection from harm in the online environment through the implementation of effective technical solutions, advice and support and procedures for managing incidents'.

As volunteers and staff of FEI it is our responsibility to raise concerns and report any safeguarding incidents that happen online. FEI is committed to the safeguarding and protection of all participants, volunteers, staff and users of our digital services and social media channels, and we apply the same safeguarding principles to FEI's activities whether they are offline or online.

This means protecting our participants, volunteers and staff from online harms such as:

- Online bullying and harassment such as offensive, intimidating, malicious, insulting behaviour and abuse of power which humiliates or denigrates the other person. This can be known as 'trolling' when the user deliberately starts



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quarrels or upsets people by posting inflammatory or off-topic messages in an online community. Online harassment can be related to personal characteristics of an individual

- Discrimination and abuse on the grounds of any protected characteristics. The content of a website can also be illegal when it threatens or harasses a person or a group of people. If this is posted because of hostility based on protected characteristic, it can be considered a hate crime,
- Cyberstalking (the repeated use of electronic communications to harass or frighten someone, for example by sending threatening communications)
- Impersonation and hacking (Impersonation is where a user pretends to be someone else online, often by taking photos from social media to build a fake profile. This is sometimes known as “catfishing”)
- Disinformation and misinformation (acts of spreading knowledge that is incorrect)
- The oversharing of personal information
- Sexual exploitation and grooming online
- Sharing of illegal and inappropriate imagery

This part of the policy covers all FEI activities which take place online, activities that take place over web-meetings provided by FEI, as well as activities on proprietary and third party (non-FEI affiliated) service providers, including digital platforms, and devices.

'Digital platforms' includes social media websites and apps such as Facebook, Twitter, Instagram and YouTube, but also software and apps such as Microsoft Teams, WhatsApp, SharePoint, and emails. 'Devices' include computers, smartphones and tablets.

FEI's digital safeguarding principles

- All staff interacting with potentially vulnerable individuals must adhere to policies, have relevant training and have DBS checks
- Ensure our projects, activities, programmes and campaigns support all of our participants, volunteers and staff to stay safe online
- Use best practice digital safeguarding for technical solutions, processes and procedures
- Help our staff and volunteers to support participants in being effective online
- Take best practice action when a digital safeguarding incident occurs
- Support and train staff and volunteers in digital safeguarding where necessary
- Maintain links with key organisations to raise awareness and refer and report incidents.
- Risk assess projects, initiatives, programmes, activities, services and campaigns to make sure digital safeguards are in place.

To put these principles into practice, our staff and volunteers must:



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- Ensure that social media accounts are set up and used responsibly, by using disclaimers to make it clear that their views, thoughts and opinions are personal and not reflective of FEI policies, procedures and guidance.
- Follow all community guidelines and terms and conditions set out by third party social media providers, including age restrictions.
- Only set up social media accounts with FEI emails as official accounts and only with the permission of their manager i.e. in a communications role.
- Ensure that all digital communications with participants are on a professional level and only carried out using official FEI emails/channels.
- Make sure that technical solutions are in place to reduce access to illegal or inappropriate content on devices owned or used by FEI. These could be filtering or monitoring software, such as parental controls.
- Ensure the correct permissions are in place before taking and using photographs on mobile devices.
- Make sure that they have parent or carer permissions before contacting a young person under 13 years of age, even if they've contacted you first.

Digital Safeguarding Procedures

If an incident happens in a group meeting or a participant raises an issue at an online meeting, you should contact the Safeguarding Trustee for support. FEI will only share information with other agencies where there are significant concerns, or a potential crime has been committed.

Staff must agree to use any laptop or any device owned by FEI safely, securely, and responsibly. Staff can use personal devices for FEI business. If you are using FEI's equipment, you must not share, download, print or distribute anything that is illegal, defamatory, obscene, indecent, pornographic, offensive, discriminatory, sexual or violent. Or any content that may cause harassment, alarm or distress. You must not use the equipment to cause harassment, alarm or distress to others.

Staff must keep other people's personal information safe online. This includes details that might be stored on your phone or laptop. Make sure that all devices, including mobile phones, are password protected. If you are asking for personal information by email, you should only use an FEI email address.

Virtual group meetings may require a group contract and consent form. Consult with the Safeguarding Trustee when necessary.

Our social media channels must reflect the values we uphold as an organisation and staff are expected to demonstrate them in all online activities. Terms and conditions must be checked for any apps used to communicate, including privacy settings and age limits.

If you need to message young participants digitally, you must avoid one-to-one contact between a volunteer and a young member and where possible any one-to-one contact with a child or young person. Participants may want to speak privately in a virtual group meeting,



but this is advised against and you should avoid it. If a young participant does message you during a virtual meeting, you should tell them that it cannot be a private conversation. Then you or they can add someone else to the chat.

If a young person contacts you on a channel that is not age appropriate, for example using WhatsApp when they're under 16, you must move the conversation to a more appropriate platform, and copy someone else in. Do not forget to reply to the young member, as no response might impact their safety, health and wellbeing.

IN-PERSON SAFEGUARDING

When meeting individuals in person in any jurisdiction, it is imperative to maintain the highest standards of Safeguarding. In reality, this entails ensuring FEI staff are protected adequately when meeting others, such as in public places rather than in private homes or secluded areas.

FEI staff should follow basic safety guidance such as knowledge of emergency numbers, and should be accompanied by an in-country chaperone from a member organization or project partner when carrying out FEI work. Partnership agreements and project outlines must be inclusive of safeguarding practice and procedure.

Furthermore, should a member of the FEI team become concerned about the safety and welfare of any individual, they should first raise this with the member organisation, to identify any safeguarding steps needed which are specific to partner's own policies and procedures. In certain cases, it may be necessary to alert the relevant authorities to provide protection.

FEI's in-person safeguarding principles

- All staff interacting with potentially vulnerable individuals must adhere to policies, have relevant training and have DBS checks
- Ensure our projects, activities, programmes and campaigns support all of our participants, volunteers and staff to stay safe
- Build in best practice safeguarding processes and procedures into partnership agreements and project plans with other organisations
- Take best practice action when a safeguarding incident occurs
- Maintain links with key organisations to raise awareness and refer and report incidents
- Responsibility for safeguarding must be shared as they children, young people, and adults can only be protected effectively when all the relevant agencies and individuals accept responsibility and co-operate with one another.
- FEI has a responsibility to inform organisations we work with, adults and children and young people, and their parents and/or carers as appropriate, of its duty to follow up any safeguarding concerns and report suspected cases of harm when disclosed or observed.



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- Risk assess projects, initiatives, programmes, activities, services and campaigns to make sure safeguards are in place.

To put these principles into practice, our staff and volunteers must:

- Uphold a culture at FEI where allegations of abuse in whatever form will be investigated thoroughly and if substantiated and carried out by a member of staff, will result in disciplinary action and reporting to DBS and or the relevant authorities in in country.
- If FEI is delivering an activity specifically adults, or children and young people at risk through another organisation, or in partnership, then it will ask for proof that the organisation has an appropriate policy and procedures in place
- No FEI member of staff or volunteer or trustee should be alone with a child or young person at risk without alerting others to the reason, in the first instance their line manager (in the case of trustees the Safeguarding Lead, Chief Executive or Chair), or if not immediately available another appropriate manager or member of staff.
- Members of staff, volunteers and trustees must not use inappropriate language or behaviour.
- All allegations of abuse against a worker/volunteer/trustee, however minor, are reported to the Safeguarding Lead.
- Parent, carer or next of kin consent (where appropriate) and contact details to be recorded for all children and young people at risk interacting with FEI.
- Safeguarding also means reducing the risk of injury. Therefore, we will carry out appropriate risk assessments before undertaking events/activities that will be attended by adults or children or young people at risk. This will include balancing the danger of injury against the benefits for participants.
- When undertaking events/activities we will arrange for appropriate first aid cover and other health and safety measures e.g. fire-fighting.

Confidentiality and Consent

Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share it must be explicit and freely given.

There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk. Where a decision to share information without consent is made, a record of what has been shared should be kept.

POLICY BREACH

Any breach of this policy by staff will be managed under the staff disciplinary procedure.

Any illegal activity would be progressed via the police.



Any unsuitable/inappropriate activities, for example cyber-bullying would be banned and could lead to criminal prosecution.

There are some activities that are legal but FEI believe to be inappropriate in a work context, these include but are not limited to - pornography, promotion of any kind of discrimination, threatening behaviour, any other information which breaches the integrity of the ethos of FEI or brings the charity into disrepute.

October 2022