

SAFEGUARDING POLICY

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1. Policy

The Fair Cobalt Alliance works in communities around the world and many of our stakeholders that we engage within our projects are marginalised, vulnerable groups. In addition, we are conscious that our work may impact on communities, and we therefore are committed to identifying and minimising negative impact by ensuring that we engage responsibly with those communities and groups, many of which may be vulnerable.

This policy sets out firstly how the organisation will manage recruitment for job roles that involve working with vulnerable groups and how it will manage matters arising during employment where it is believed that vulnerable groups could be, or have been, placed at risk.

The policy also explains the responsibilities of members, staff and volunteers in relation to the safeguarding of vulnerable groups and the procedure that should be followed when reporting an allegation of abuse to any such individual.

2. Purpose and scope for this policy

This policy applies to all members, staff and volunteers engaged by the organisation. It is the responsibility of everyone working on behalf of the organisation to report any allegations of abuse.

Our policy is to:

- uphold the right of everyone to live free from abuse and the fear of abuse.
- undertake due diligence for each project to ensure the communities and people we engage with are not exposed to harm by the work that we do.
- liaise effectively with appropriate agencies and bodies regarding the reporting of abuse or suspected abuse.
- train our workforce to look out for abuse and ensure the risk of abuse or harm is minimised.

3. Who is covered by this policy?

This policy applies to those working at all levels and grades, including members, senior managers, officers, trustees, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as staff in this policy).

4. Who is responsible for this policy?

The Steering Committee have overall responsibility for the operation of this policy. They will ensure that adequate resources are available for the effective implementation of this Policy.

It is the responsibility of everyone working for or on behalf of the organisation to report any allegations of abuse.

Any safeguarding concerns should be reported to the Steering Committee.

5. Recruitment

We will make it clear to candidates when recruiting for a role that the work is likely to involve engaging with marginalised and vulnerable groups and that candidates would therefore have a responsibility to adhere to this policy.

Before we employ a candidate, we will require the candidate to provide a satisfactory Enhanced Disclosure with a relevant barred list check from the Disclosure and Barring Service, or to undertake an equivalent process in their home country. The purpose of this check is to confirm that the candidate is suitable to perform this work and is not barred from doing so.

We will make any offer of employment conditional upon satisfactory background checks, including satisfactory criminal record and barred list checks. We reserve the right not to employ a candidate where these conditions are not satisfied (see our Vetting Policy for further details).

6. If any members or staff obtains a conviction or is added to a barred list

If a member or staff is added to a barred list during employment and or engagement or obtains a criminal conviction, this may bring their suitability for continued employment and or engagement into question.

In such circumstances we would undertake a full investigation and the staff member may be subject to our disciplinary process. We reserve the right to re-deploy or dismiss where continued employment cannot be supported.

7. Reporting allegations of abuse

All staff, and any volunteers engaged on behalf of the Company, must be vigilant at all times to risks of abuse towards the vulnerable groups that they work with. This may include behaviour from other members of staff and stakeholders.

Abuse is a violation of an individual's civil or human rights by another person. This can be a single act or multiple acts and it may occur in a variety of ways. Abuse of an individual may be verbal, physical or psychological. It may occur from a deliberate act or a failure to act.

Abuse may also occur when an individual is persuaded to do something that he or she has not consented to, or is unable to consent to, or where the individual is exploited by another person.

Abuse can include, but is not limited to, behaviours in the following groups:

- Physical – slapping, hitting, kicking, deliberately injuring, restraining
- Sexual – actual physical sexual abuse or harassment, threats of such abuse
- Financial or material – withholding of money/wages/items, fraud, financial blackmail or exploitation.
- Discrimination – on the basis of a characteristic such as sex, race, religion or belief, sexual orientation, disability
- Neglect – failure to fulfil basic needs, failure to ensure an individual's safety or deliberately exposing them to harm.
- Emotional or psychological – lack of help, care, love, encouragement, being ridiculed, derided, intimidated or coerced.

If you believe or suspect that a vulnerable individual has been subjected to abuse, you must refer the matter to your manager or Company Trustee immediately. We will take all allegations of abuse seriously and where the suspected abuse is being perpetrated by a member of staff or volunteer of TIF and appropriate investigation will take place. Where the suspected abuse is being carried out by a third party, an appropriate individual will be advised (e.g. senior manager within a third party stakeholder organisation, or other local authority/social services equivalent).

When reporting an allegation of abuse, it is important to provide as much detail as possible, including the name of the person who has been subjected to abuse, the nature of the abuse, the dates and times of any specific incidents and details of any evidence or other witnesses that may be available.

8. Investigation

We will investigate all complaints of alleged or suspected abuse by a member, staff or volunteer, fully, in accordance with the disciplinary procedure.

We may consider it necessary to inform the local Police or other relevant authorities of allegations under investigation.

9. Suspension

We reserve the right to suspend a member or staff on full pay pending investigation into an allegation of abuse and pending any resulting disciplinary proceedings.

10. Disciplinary action

Where we have reason to believe that an allegation of abuse by a member of staff has foundation, we will arrange a disciplinary meeting with the individual. This could result in a decision to take disciplinary action against the employee, up to and including dismissal.

11. Duty to refer information

Where the employee is a UK National, we are legally required to refer certain information about an individual to the Disclosure and Barring Service.

This duty applies where:

- (a) An employee is dismissed because they have harmed, or may harm a child or adult.
- (b) we have suspended a member of staff and have reason to believe that they have engaged in relevant conduct or have harmed or may harm a child or adult or have received a caution or a conviction for a relevant criminal offence.

- (c) The staff member resigns in circumstances where there is a suspicion that they harmed, or may harm, a child or vulnerable adult. This may, for example, arise where an employee resigns before disciplinary action is taken by the organisation.

12. Support for those who report abuse

All those making a complaint or allegation or expressing concern should be reassured that:

- They will be taken seriously and that they will have alleged incidents recognised and taken seriously.
- Their comments will usually be treated confidentially, but their concerns may be shared with the appropriate authorities if they or Elijah are at significant risk.
- They will be involved in any process as appropriate.
- They will receive information about the outcome as appropriate.

13. Guidance

It is not your responsibility to decide whether an individual is being abused but you must fulfil your obligation and requirements to act on any concerns.

- If an individual makes a disclosure of abuse to you, do not dismiss or make light of the concerns being raised.
- Do not promise you will not tell anyone; explain that you may have to
- Allow the individual to speak without interruption, accepting what is said.
- Do not investigate but record the individual's words in their language. Be supportive but only ask questions to identify what they are telling you. Do not ask leading questions.
- Do not pass judgment on the disclosure or those involved.
- Advise that you will try and help and support but you must pass this information on

- Record all information as soon as possible and within 24 Hours. Make detailed notes of what you have seen/heard but do not delay in passing on the information.
- Refer the matter on to your line manager or a Steering committee.
- Under no circumstances 'gossip' about the information given to you. The information should only be shared with those involved in managing the situation.
- Do not jump to conclusions, speculate, make accusations or assumptions.

14. Policy review

This Policy will be reviewed at least every two years. The next formal review will therefore take place in June 2025. This Policy may be reviewed earlier should there be a legislative or other significant need.