

# SAFEGUARDING POLICY

Internal & External Policy

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## 2 Scope

This Policy applies to:

- All staff contracted by Ethical Tea Partnership (ETP)
- Associated personnel whilst engaged with work or visits related to ETP, including but not limited to the following: consultants; volunteers; contractors; programme visitors including ETP members, journalists, celebrities and politicians

## 3 Purpose

The purpose of this policy is to protect programme participants, particularly children and at-risk adults<sup>1</sup>, from any harm that may be caused due to their coming into contact with ETP or partner staff. This includes harm arising from:

- The conduct of staff or personnel associated with the organisation and its activities;
- The design and implementation of programmes and activities.

The policy lays out the commitments made by ETP, and informs staff and associated personnel<sup>2</sup> of their responsibilities in relation to safeguarding.

### What is safeguarding?

The UK's Safeguarding Vulnerable Groups Act 2006 defines safeguarding as 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.

Further definitions relating to safeguarding are provided Glossary – Annex 1.

## 4 Policy Statement

ETP believes that everyone we encounter, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. ETP will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding [as appropriate]: child safeguarding, adult safeguarding, and protection from sexual exploitation, abuse and sexual harassment. These key areas of safeguarding may have different policies and procedures associated with them.

ETP commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

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<sup>1</sup> People reached through ETP's programmes

<sup>2</sup> See 'Scope' for definition of associated personnel

## 4.1 Prevention

### 4.1.1 ETP Responsibilities

ETP will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with ETP. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to due process.

### 4.1.2 Staff Responsibilities

#### *Child safeguarding*

ETP staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

#### *Adult safeguarding*

ETP staff and associated personnel must not:

- Sexually abuse or exploit at-risk/vulnerable adults
- Subject an at-risk/vulnerable adult to physical, emotional or psychological abuse, or neglect

#### *Protection from sexual exploitation and abuse*

- In a work context and in particular during work visits, ETP staff and associated staff must not exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to recipients of assistance.
- ETP staff and associated staff must, under no circumstances, engage in any sexual relationships with recipients of assistance, since they are based on inherently unequal power dynamics

Additionally, ETP staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of ETP's Safeguarding Policy. For

Ethical Tea Partnership is a private company limited by guarantee, incorporated in England and Wales.

Registered number 7014678      Tel: +44 (0) 2035 596340

Registered office: The Green House, 244-254 Cambridge Heath Road, London, E2 9DA

[www.ethicalteapartnership.org](http://www.ethicalteapartnership.org)

example ensuring that there are no interactions alone with children, that interactions are held in safe spaces to minimize exposure to risk.

- Report any concerns or suspicions regarding safeguarding violations by an ETP staff member or associated personnel to the appropriate staff member

## 4.2 Reporting

ETP will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by ETP's Whistleblowing Policy (Draft).

ETP will also accept complaints from external sources such as members of the public, partners and official bodies.

### 4.2.1 How to report a safeguarding concern

ETP will nominate a Safeguarding Focal Point for each country.

Staff members who have a complaint or concern relating to safeguarding should report it immediately to the Safeguarding Focal Point [as appropriate] or line manager. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member or the whistleblowing and safeguarding email [confidential@ethicalteapartnership.org](mailto:confidential@ethicalteapartnership.org). The following staff have access to the email:

- Executive Director
- Operations Lead

## 4.3 Response

A survivor centred approach will be taken throughout. ETP will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

Fact finding will be carried out to establish if an investigation can be carried out. Survivors will decide if an investigation should be conducted. ETP can conduct an investigation itself or using a third-party investigator. This should be concluded within a reasonable timeframe (around 4 weeks).

ETP will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see **Complaints Handling Procedure Code 3.4 - Draft**).

ETP will apply appropriate disciplinary measures to staff found in breach of policy.

## 5 Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

## 6 Policy review

Policy will be reviewed annually.

## Annex 1 – Glossary of terms

- **Programme participant:** Someone who directly receives goods or services from ETP's programme. Note that misuse of power can also apply to the wider community that the organisation serves, and also can include exploitation by giving the perception of being in a position of power.
- **Safeguarding:** Safeguarding is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children and vulnerable adults, and that is that they do not expose them to the risk of harm and abuse.
- **ETP Staff Member or contractor:** directly employed or contracted by ETP
- **ETP Associated Personnel:** Anyone who comes into contact with a child or vulnerable adult as a result of ETP work but who is not employed by ETP, including but not limited to: partner employees; consultants; volunteers; contractors; freelancers, programme visitors including journalists.
- **Child:** A person below the age of 18 -UN Convention on the Rights of the Child.
- **Non-Associated Personnel:** People not employed directly through ETP or its partner organisations and contractors.
- **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, interrogation, excessive pressure to 'perform' or pose for cameras, excessive repeat interviews around emotionally disturbing experiences, and isolation.
- **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.
- **Survivor:** A 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.
- **At-risk adult/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.

*Note that due to issues of poverty, marginalisation and relative lack of power, most people we work with in international programmes can be classed as vulnerable.*