Safeguarding Policy

Purpose

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

- The conduct of staff or personnel associated with Hockey Mentors
- The design and implementation of Hockey Mentor's programmes and activities

The policy lays out the commitments made by Hockey Mentors and informs staff and associated personnel[1] of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Hockey Mentor's Anti Bullying and Harassment Policy[2]
- Safeguarding concerns in the wider community not perpetrated by Hockey Mentors or associated personnel

What is safeguarding?

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect[3]

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 in the glossary below.

Scope

- All staff contracted by Hockey Mentors
- Associated personnel whilst engaged with work or visits related to Hockey Mentors, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians

[1] See 'Scope' for definition of associated personnel
[2] Some NGOs are now including workplace bullying and harassment in their safeguarding portfolio, as it relates to harm caused by coming into contact with our staff or programmes. However accompanying procedures for dealing with workplace bullying and harassment are likely to be different, due to legal and statutory differences in handling workplace incidents
[3] NHS 'What is Safeguarding? Easy Read' 2011

Policy Statement

Hockey Mentors believes that everyone we come into contact with, 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. Hockey Mentors 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 and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

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

Prevention

Hockey Mentors responsibilities

Hockey Mentors 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 [NGO]. 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 organization
- Follow up on reports of safeguarding concerns promptly and according to due process

Staff responsibilities

Child safeguarding

Hockey Mentors 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

Hockey Mentors staff and associated personnel must not:

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

Protection from sexual exploitation and abuse

Hockey Mentors staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, Hockey Mentors staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by an Hockey Mentors staff member or associated personnel to the appropriate staff member

Enabling reports

Hockey Mentors 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 Hockey Mentor's Disclosure in the Workplace (Whistleblowing) Policy.

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

How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their 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. For example, this could be a senior manager or a member of the HR Team.

In relation to non-staff members, any person who wish to make a complaint or has any concerns regarding safeguarding can communicate such concerns to the Safeguarding Focal Point of Contact listed below via email. All communication pertaining to safeguarding complaints and concerns will be recorded in the safeguarding register held by the CEO of Hockey Mentors.

Safeguarding Focal Point -

Jack Childs (temporary) – jack@hockeymentors.org

Response

Hockey Mentors will follow up safeguarding reports and concerns in accordance with the following process:

- Once a concern or complaint is raised and received in writing, the Safeguarding Focal Point will acknowledge receipt of the concern/complaint within 3 working days of receipt of the concern or complaint via email.
- Within 5 working days from acknowledgment of the concern and complaint by Hockey Mentors, the safeguarding focal point officer will either via email or telephone contact the parties concern of the said complaint and the facts surrounding the concern/complaint.
- Withing 7 days thereafter the safeguarding focal point officer will provide an update on the procedure to be adopted to investigate the complaint and/or concern. This may entail a written response setting the time management of such investigations and such interim measures that will be undertaken to safeguarding persons involved in the investigation.
- Within no more than 30 days from the date of the complaint/ concern – Hockey Mentors will communicate will invite all parties concern to meet to discuss the findings and appropriate proposed resolution to the matter.
- In the event the incident or concern raised requires the resources and immediate attention of external resources all parties will be informed of such requirements within 3 days of the receipt of such complaint or concern.
- The safeguarding focal point will communicate in writing the final decision on the matter within one month of the commencement of any and all investigations to all parties concern.
- All communications relating to any and all concerns and complaints will be stored electronically for a period of 5 years.
- Hockey Mentors will apply appropriate disciplinary measures to staff found in breach of policy.
- Hockey Mentors 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.

Confidentiality

It is essential that confidentiality in 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.

Associated policies

Please see Policies posted on the website.

Glossary of Terms

Beneficiary of Assistance

Someone who directly receives goods or services from Hockey Mentors's programme. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

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[4]

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 programme, 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 materialize. Those systems must be survivor-centered and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the center 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 incudes 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.