

## Safeguarding and Welfare Policy

---

### Policy Statement

Amala Education (Amala) is committed to and has a responsibility to safeguard the welfare of all community members of Amala, as well as others who come into contact with us, from harm. We have a zero-tolerance approach to any harm or exploitation of a child or a young person by our staff, volunteers, representatives or partners in face-to-face and online environments.

It is Amala's policy to create and proactively maintain an environment that prevents and deter any actions and omissions, whether deliberate or unintentional, that place children and young people at risk of any kind of abuse. Amala strives through awareness, good practice, and training, to minimise the risks to children and young people and to take positive steps to help protect children and young people who are the subject of any concerns, and to ensure appropriate action is taken if harm occurs.

### Policy Rationale

Amala believes that a child, young or vulnerable person should never experience abuse of any kind, and recognises the right of all people - regardless of age, disability, gender, race, religion, belief, sex, sexual orientation or gender reassignment - to be treated with dignity and respect and equal protection from all types of harm and abuse.

Amala's Safeguarding and Welfare Policy is aligned to the United Nations Convention on the Rights of the Child, 1989 (CRC), relevant national laws including the Safeguarding of Vulnerable Groups Act 2006 in the UK, recommendations of Keeping Children Safe that set the standards for safeguarding in humanitarian organisation as well as international good practice.

Amala expects all individuals, groups, organisations and companies affiliated with its community to act with integrity and to take responsibility for keeping students safe. This policy is binding for all who have contact with the Amala community including staff, students, volunteers, trustees, consultants, partners, visitors, contractors, companies, parents and significant adults either in face-to-face or online settings.

### Definitions and Clarifications

**Safeguarding** is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children/young people, that they do not expose children/young people to the risk of harm and abuse, and proactive measures that organisations take to protect students from maltreatment.

#### Safeguarding and Welfare Policy

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

**Abuse** is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. Abuse can also result from the behaviour of those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.

Abuse can take a number of forms, including the following:

- Physical abuse
- Sexual abuse
- Psychological / Emotional abuse
- Neglect
- Peer on peer abuse

**Appendix 1** of this Policy details the different types of abuse and recognising indicators that abuse might be present.

**Child/Young Person:** Amala defines a child as any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood. At Amala, we use the term ‘child’ to refer to anyone under the age of 18, and the term ‘young person’ to define any student over the age of 18. We have a duty of care to all Amala students regardless of their age, and this Policy aims to protect all Amala students as well as children and young people who come into contact with our organisation.

## **Safeguarding Roles Throughout Amala**

Safeguarding is everyone’s responsibility and is embedded in Amala’s culture and all aspects of operations, including but not limited to recruitment, budgeting, classroom and online learning, learning outside the classroom, risk management and communications.

There are key roles with specific responsibilities for safeguarding which can be found in Appendix 4.

## **Amala Safeguarding Principles**

Amala commits to taking all reasonable measures to mitigate risks and protect children and young people on our programmes from harm. The aim of our safeguarding procedures are to prevent and respond to children and young people at Amala experiencing, or at the risk of, abuse, neglect, violence and exploitation.

The following principles underlie all safeguarding processes at Amala:

**Best Interests of the Child/Young Person:** The term “best interests of the child/young person” refers to a student’s physical and emotional safety, as well as their right to be treated with dignity and respect. At Amala, the best interests of the child/young person

### **Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

provide the basis for all decisions and actions taken with regard to safeguarding and pastoral care.

**Creating a safe and caring environment for all community members to thrive:** Amala recognises that safeguarding children and young people is the responsibility of all members of our community including staff, students, volunteers, trustees, consultants, partners, visitors, contractors, companies, parents and significant adults.

Through this shared commitment, Amala aims to create an environment where everyone feels safe and is able to share concerns related to issues within or outside of Amala learning centres.

Amala proactively works to prevent harm and abuse through our learning programmes, creating an open and safe organisational culture, offering appropriate pastoral care and raising awareness of safeguarding with parents and other significant adults.

Amala is committed to ensuring, through our recruitment and selection of volunteers and paid staff, that all people who work in our learning centres are suitable to work with children and young people. In keeping with this expectation, applicants for positions at Amala must be willing to undergo safeguarding protection screening including checks with past employers.

The Amala Safeguarding Code of Conduct and Team Code of Conduct clearly details the organisation's expectations of how adults should behave in their interactions with children and young people.

**Confidentiality:** Amala has a duty to manage sensitive information in a respectful and professional manner. Staff must keep information about suspected or reported safeguarding concerns and incidents strictly confidential. Only staff who are directly involved in managing the specific case shall be privy to this information.

Regardless of the duty of confidentiality, any member of staff who has reason to believe that a child/young person may be suffering harm, or be at risk of harm, has a duty to forward this information without delay, to a Designated Safeguarding Lead.

It is important to recognise that Amala works within a context of local and international child protection and safeguarding laws and we will share relevant safeguarding concerns with others who need to know including statutory agencies. Wherever possible, confidential information will not be passed to statutory agencies without the consent of the owner. There may be times, however, when disclosing confidential information without consent is necessary to safeguard a child/young person because the information suggests that there is a risk to others. If this is the case, information will be passed to the appropriate statutory agency by the Safeguarding Lead, making it clear that consent has not been sought and

#### **Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

why, or that consent has been refused. The reasons for the disclosure without consent must be recorded and stored securely by the Safeguarding Lead.

## Reporting & responding to concerns

Amala staff and volunteers are required to immediately report any concerns of possible or actual harm, including abuse, exploitation, and neglect and policy non-compliance, or risk of such, resulting from action or inaction by anyone covered by this policy.

The primary goal of any safeguarding response is to prevent and respond to children and young people experiencing or at risk of, abuse, neglect, violence, and/or exploitation.

The document *Responding to Safeguarding Concerns* will detail the procedures for reporting, investigating and responding to safeguarding concerns regarding an Amala student whilst the document *Responding to Safeguarding Concerns Against Amala Staff* will detail the procedures for investigating and responding to safeguarding concerns related to Amala staff, trustees, contractors, or volunteers.

We are committed to reporting any incidents to the appropriate regulatory bodies (including the UK Charity Commission), relevant funding government departments or other funding bodies, as required. Where there is evidence that criminal activity may have taken place we will report to the relevant police and/or safeguarding authorities as appropriate.

## Responding to Allegations or Concerns regarding Peer on Peer Abuse

Any report of possible peer on peer abuse will always be investigated and managed through the safeguarding system. This is to ensure an immediate response in order to minimise potential harm to a child/young person. Amala will create designated procedures for responding to allegations or concerns regarding peer on peer abuse.

## Related Procedures and Practices

**Record Keeping:** All student safeguarding files should be entered and stored safely. Safeguarding Leads are responsible for ensuring all documents are complete and factual.

**Professional And Personal Conduct Of Staff:** Amala has a duty to ensure that professional behaviour applies to relationships between staff and students, and that all members of staff and volunteers know what constitutes appropriate behaviour and what it means to act with integrity. The Amala Team Code of Conduct and the Safeguarding Code of Conduct details Amala's expectations about staff behaviour around children and young people.

**Safer Recruitment:** Amala applies best practice standards in the recruitment and screening of staff, and will take all reasonable steps to ensure that it engages the most suitable and appropriate people to work with children/young people. All prospective staff and volunteers who have contact with students are required to undergo appropriate background screening

### Safeguarding and Welfare Policy

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

checks before working with Amala. Amala' will create and implement the document *Safer Recruitment Procedures*.

**Safeguarding for students:** Amala provides a safeguarding induction that includes online safety for all students and makes it clear how and to whom concerns and incidents can be reported.

**Staff Safeguarding Training:** Amala will ensure that all staff receive regular and systematic safeguarding training, including online safety. All new members of staff, consultants and volunteers will receive an induction to Safeguarding, which will give an overview of abuse as well as explaining the systems for reporting concerns. During induction staff will receive a copy of the Safeguarding Policy, Safeguarding Code of Conduct and the Team Code of Conduct and will be required to sign it. All documents will be available on Amala's central Knowledge Management System Slab.

**Digital and Online Safety:** Amala is committed to creating a safe digital learning space through the curriculum, learning material, working with staff and students and developing policies and procedures. Like all safeguarding concerns, online safeguarding concerns should be reported immediately to the Safeguarding Lead.

Amala has a Data Protection Policy which governs the collection, use and disclosure of personal data.

## Related Policies

Whistleblowing Policy

Complaints Policy

Staff Code of Conduct

Student Code of Conduct

Staff Safeguarding Code of Conduct

Disciplinary Policy and Procedures

Data Protection Policy

## Review

This Policy and related procedures are reviewed and updated at least annually with the needs of all students in mind and in light of the specific risks facing the Amala students.

### Safeguarding and Welfare Policy

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

## Appendix 1 – Recognising the signs of abuse

It can often be difficult to recognise abuse. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further. Someone can abuse a child/young person by actively inflicting harm or by failing to act to prevent harm.

Abuse can take place within a family, in an institutional or community setting, by telephone or online on the Internet. Abuse can be carried out by someone known to the person or by a complete stranger. If you are worried about a child/young person it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

The list below is not an exhaustive list of abuse and its indicators. There could be other forms of abuse we have not discussed in this policy.

The issues pertaining to online safety are detailed in Appendix 2.

### A. Children

Physical Abuse	<p>Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Any injuries not consistent with the explanation given for them</li> <li>• Injuries which occur to the body in places which are not normally exposed to falls, bumps, etc</li> <li>• Injuries which have not received medical attention</li> <li>• Reluctance to change for, or participate in, games or swimming</li> <li>• Finger marks or multiple bruising</li> <li>• Bruises, bites, cuts, scratches, burns, fractures, etc. which do not have an accidental explanation</li> <li>• Flinching or evidence of pain/discomfort during normal activity</li> </ul>
Emotional Abuse	<p>Emotional abuse is the emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless, unloved or inadequate or causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age or developmentally inappropriate expectations. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.</p>

#### Safeguarding and Welfare Policy

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

	<p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging</li> <li>• Nervousness, frozen watchfulness</li> <li>• Obsessions or phobias</li> <li>• Sudden under-achievement or lack of concentration</li> <li>• Inappropriate relationships with peers and/or adults</li> <li>• Attention seeking behaviour</li> <li>• Running away/stealing/lying</li> </ul>
<p>Sexual Abuse</p>	<p>Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not they are aware what is happening. This may involve physical contact, including penetrative (e.g. rape, buggery) or non-penetrative acts or non-contact activities, such as involving children in looking at, or the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Any allegations made by the child concerning sexual abuse</li> <li>• Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play</li> <li>• Sexual activity through words, play or drawing</li> <li>• Child who is sexually provocative or seductive with adults</li> <li>• Inappropriate bed sharing arrangements at home</li> <li>• Unexplained bruising around or bleeding from the genital area</li> <li>• Stained or bloody underclothing</li> <li>• Unexplained difficulties in walking</li> </ul>
<p>Neglect</p>	<p>Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failure to protect a child from physical harm or danger, or failure to ensure access to appropriate medical care or treatment.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Persistent hunger</li> <li>• Weight loss</li> <li>• Poor hygiene</li> <li>• Dress inappropriate to weather or activities</li> </ul>

**Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

	<ul style="list-style-type: none"> <li>Physical problems and medical needs that are not attended</li> </ul>
Peer on Peer Abuse	<p>In addition to being harmed by adults, it is also recognised that children and young people can be exploited, bullied and / or harmed by their peers who are the same or similar age.</p> <p>Peer on peer abuse is most likely to include, but may not be limited to:</p> <ul style="list-style-type: none"> <li>Bullying (including cyberbullying, prejudice-based and discriminatory bullying)</li> <li>Abuse in intimate personal relationships between peers</li> <li>Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)</li> <li>Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);</li> <li>Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse</li> <li>Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party</li> <li>Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)</li> <li>Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm</li> <li>Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).</li> </ul>
Organised Abuse	<p>Organised or multiple abuse may be defined as abuse involving one or more abusers and a number of related or non related abused children and young people. The abusers concerned may be acting in concert to abuse children/young people, sometimes acting in isolation, or may be using an institutional framework or position of authority to recruit children for abuse.</p> <p>Indicators include:</p>

**Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023



	<ul style="list-style-type: none"> <li>• Series of complaints from different parents about the same staff/situations/issues</li> <li>• Records regularly being mislaid/poor record keeping</li> <li>• Controlling relationships</li> <li>• Children/activities being visited regularly by “associates” of staff</li> </ul>
--	--

**B. Young people and adults**

Physical Abuse	<p>Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Injuries not consistent with falls or offered explanations</li> <li>• Unexplained loss of hair in clumps</li> <li>• Cuts that are not likely to be explained by self-injury</li> <li>• Finger-marks</li> <li>• Flinching or evidence of pain/ discomfort during normal activity</li> </ul>
Psychological abuse	<p>Psychological abuse is any pattern of behaviour by another that results in harm and may include insults, humiliation, ridicule, bullying, threats, enforced isolation, interference in relationships and contact between consenting adults, coercion, lack of privacy or choice, denial of dignity.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Signs of strain within a relationship and/ or tension when a particular person is present</li> <li>• Indicators that an individual acts differently when a third person is present than at other times</li> <li>• Suggestions of refusal to allow a choice eg to eat or not eat more or less of particular foods, to dress according to preference</li> <li>• Signs of withdrawal or fear or other changes to emotional state</li> <li>• Signs of unexplained sleep or weight loss</li> </ul>
Sexual Abuse	<p>Sexual Abuse is any sexual activity involving but carried out without the informed consent of an adult at risk. Sexual abuse may include sexual intercourse, inappropriate touching, offensive or suggestive language,</p>

**Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

	<p>‘voyeuristic’ behaviour and exposure to the suggestive or sexually explicit activities of others, including films, photographs, images etc.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Unexplained bruising around or bleeding from the genital area;</li> <li>• Stained or bloody underclothing</li> <li>• Unexplained difficulties in walking</li> <li>• Reluctance of the person to be alone with an individual known to them</li> <li>• Unusual and inappropriate sexualised language</li> </ul>
Financial or material abuse	<p>Financial abuse is the misappropriation of funds (savings or income) or property of an adult at risk. This may include exploitation, theft or fraudulent use of money, misuse of property or possessions and incurring financial liabilities on behalf of an adult at risk without their informed consent.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Unexplained shortage of money despite a seemingly adequate disposable income</li> <li>• Unexplained withdrawals from savings accounts</li> <li>• Unexplained disappearance of financial documents for example bank statements, receipts for non-routine expenditure</li> <li>• Loss of personal possessions</li> </ul>
Neglect and acts of omission	<p>Neglect may be deliberate or by default where the abuser is not able to provide the care and support needed or may not recognise the need for the care and support to be given. The abuser may also be neglecting themselves.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Persistent hunger and / or weight loss</li> <li>• Poor hygiene</li> <li>• Dress inappropriate to weather or activities</li> <li>• Denial of religious or cultural needs</li> <li>• Physical problems and medical needs that are not attended to</li> </ul>

**Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

<p>Discriminatory abuse</p>	<p>When the adult at risk is harassed or discriminated against because of their age, race, gender, sexuality, religion, disability, culture etc</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Signs of strain within a relationship and/ or tension when a particular person is present</li> <li>• Signs of withdrawal or fear or other changes to emotional state</li> <li>• Unexplained outbursts</li> <li>• Out of character discriminatory language, behaviour</li> </ul>
<p>Organisational abuse</p>	<p>Where neglect and poor professional practice impact on care. It can occur when poor communication, systems, practice and norms mean the care received is below that what should be expected.</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Medication errors</li> <li>• Poor record keeping</li> <li>• Complaints from service users and their family</li> <li>• Loss of personal possessions / clothing</li> <li>• Controlling relationships between staff and service users</li> </ul>
<p>Self Neglect</p>	<p>Where the adult at risk is neglecting to care for their own personal hygiene, health or surroundings</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Hoarding</li> <li>• Poor personal hygiene</li> <li>• Unexplained weight loss</li> <li>• Wearing the same clothes for a number of days</li> <li>• Physical problems and medical needs that are not attended to</li> </ul>
<p>Modern Slavery</p>	<p>Includes forced labour, debt bondage, sexual exploitation, criminal exploitation and domestic servitude</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• Not being allowed to travel alone or make decisions</li> <li>• Lack of personal possessions</li> <li>• Reluctance to seek help</li> <li>• Poor levels of nourishment, dress and energy</li> </ul>

**Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

Domestic violence	<p>Includes controlling, coercive or threatening behaviour and / or violence between people who are or have been intimate partners or family members</p> <p>Indicators include:</p> <ul style="list-style-type: none"> <li>• 'Honour' based violence</li> <li>• Female genital mutilation (FGM)</li> <li>• Forced marriage</li> <li>• Signs of strain within a relationship and/ or tension when a particular person is present</li> <li>• Signs of withdrawal or fear or other changes to emotional state</li> </ul>
-------------------	---

## Appendix 2 - Online Safety

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young people with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

### Safeguarding and Welfare Policy

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

## Appendix 3 - Safeguarding Code of Conduct towards people in the communities we work in

The Amala Safeguarding Policy is aligned with the United Nations Convention on the Rights of the Child. Safeguarding is everyone's responsibility, and Amala expects all individuals affiliated with our organisation, including volunteers, staff and representatives, to act with integrity and to take responsibility for keeping students safe by complying with this Code of Conduct. This includes the following:

- To actively work to protect children and young people by reading, understanding and complying with the Amala's Safeguarding and Welfare Policy and all related policies and procedures
- To maintain the rights of others by always acting fairly and honestly, and by treating people with dignity and respect and promoting democracy, mutual respect and tolerance.
- To consider children and young people's health, safety and wellbeing, and their best interests paramount
- To work and communicate openly and in an open environment and to take steps in order to avoid situations that could be misinterpreted. This applies to both in-person and online environments.
- To develop relationships with all stakeholders which are based on equality, trust, respect and honesty.
- To understand that students must give their permission to have their photographs taken, or to be filmed or recorded. Where students have given permission, students must still only be identified with any of the two following identifiers: first name and nationality, or age.
- To take responsibility for their own use of technologies making sure that they use technology - including social media - responsibly, safely and legally.
- To report any matter, incident or concern which causes you to believe that a vulnerable person is at risk, or is likely to be at risk (including online), of harm and / or which breaks the standards of this Code of Conduct.

### Children

1. Amala Personnel shall treat every child with dignity and respect regardless of differences of ethnicity, religion, age, ability, gender, sexual orientation, class and economic circumstances.
2. Amala Personnel shall not engage in any act of child abuse, physical or sexual; child trafficking or exploitation; child labor; child pornography, violence against children; or commit any act in violation of national laws on children's rights, whether engaging in Amala official business or during personal time.

#### **Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

3. Amala Personnel shall not make suggestions to clients or offer inappropriate or offensive advice that could be considered abusive. Amala Personnel shall not commit any form of psychological abuse, such as verbally or physically intimidating, threatening, humiliating, degrading, shaming, blaming or coercing a child.
4. Amala Personnel shall not hire children as house help or cause the employment of any child in any business, including home, commercial or entrepreneurial business establishments, agriculture, fishing and the like, unless the child is involved in a vocational training program under the supervision of a qualified organisation. This restriction shall not apply to Amala Personnel giving part time or occasional work to a child where such work does not take place during normal school hours and where such work is not unlawful under both the laws in effect in the relevant jurisdiction and in the UK.
5. Amala Personnel shall not give personal gifts or cash to assisted children and shall not show favouritism to assisted children.
6. Amala Personnel shall not develop relationships with assisted children and/or assisted children's families outside of the scope of Amala-related duties.
7. Amala Personnel shall not have an assisted child visit their place of residence unless part of an Amala sponsored activity involving multiple assisted children and multiple Amala Personnel.
8. Amala Personnel shall not use any Amala issued electronics (computer, phone, etc.) or any Amala resources whatsoever to access any pornography from the internet, forward pornographic emails, or gain opportunities for sexual encounters. The main communication tool between Amala Personnel and Amala students is the Aula platform. Where a personal email account or telephone is used to make contact with students, this must only be in relation to the student's learning experience with Amala.
9. Amala Personnel/approved visitors are always responsible for the interaction between an adult and a child even when it appears that a child is acting in a provocative manner. It is the responsibility of the adult to set appropriate boundaries that protect the best interest of the child.

## Adults

1. Amala Personnel shall not use their position with the community to exploit members of the community whether for personal gain or otherwise and whether, physically, emotionally or financially.

### **Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

2. Amala Personnel shall not use illegal drugs, alcohol to excess or otherwise behave in a manner likely to bring disrepute to Amala.
3. Amala Personnel shall not engage in or condone the use of prostitutes or offer any inducement to / coerce any member of the community into providing sexual favours.

**Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

## Appendix 4 - Safeguarding Roles and Responsibilities

<b>Safeguarding Roles and Responsibilities</b>
<p><b>All Amala team members and volunteers</b></p> <ul style="list-style-type: none"> <li>● Read, understand and comply with this Safeguarding and Welfare Policy</li> <li>● Read, understand and comply with the Safeguarding Behaviour Code of Conduct and the Team Code of Conduct</li> <li>● Receive and report any safeguarding concerns immediately to Designated Safeguarding Lead</li> <li>● Engage in regular safeguarding training as provided by Amala</li> </ul>
<p><b>Global Safeguarding Lead (Co Executive Director)</b></p> <ul style="list-style-type: none"> <li>● Oversees and holds Amala accountable for implementing the Safeguarding and Welfare Policy</li> <li>● Provides advice and support for staff on safeguarding</li> <li>● Coordinates ‘support team’ following allegations or disclosures of abuse</li> <li>● Monitor the overall trend of safeguarding concerns and report annually to the Board of Trustees on the implementation of Amala’s policies and procedures</li> <li>● Ensure that all staff, consultants, volunteers and partners working for and with Amala are aware of their safeguarding duties, have read the safeguarding policies and will adhere to them at all times</li> <li>● Offer advice and support to staff and trustees working with Amala to enable them to understand and fulfil their responsibilities.</li> <li>● Oversees Communications Policies related to safeguarding</li> </ul>
<p><b>Designated Safeguarding Lead</b></p> <ul style="list-style-type: none"> <li>● Responds to disclosures of abuse or other safeguarding concerns</li> <li>● Maintains records ensuring confidential storage and transfer of information as required</li> <li>● Be familiar with legislation and statutory guidance in the country they work in</li> <li>● Manages the referral and support process for in-country cases</li> <li>● Oversee risk management in the areas of safeguarding and student safety for learning and activities that take place outside Amala’s centres.</li> <li>● Keeps the Global Safeguarding Lead informed of all significant safeguarding matters</li> <li>● Raises matters of safeguarding and ensures that safeguarding is embedded into organisational procedures and every-day decision making.</li> </ul>

**Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023



### Programme Coordinators and Managers

- Ensure due regard to premises design, layout and designation comply with best practices in safeguarding and child protection.
- Implement and maintain a registration system for visitors, including alumni, that ensure they are authorised, supervised by Amala staff at all times and aware of appropriate behaviour with Amala students and staff.
- Ensure that contractors and providers that have direct or indirect contact with students are background checked in line with Amala's guidelines and that they follow Amala's safeguarding policy and procedures.
- Promotes the visibility of safeguarding via signages in learning centres.

### Learning Leads

- Ensures that students have appropriate safeguarding induction and learn how to stay safe and keep each other safe including in an online environment.

### People, Culture and Operations Coordinator

- Ensures that Amala adheres to best *safer recruitment practices*
- Supports investigations of safeguarding allegations against Amala staff
- Supports disciplinary action when necessary
- Ensure all adults who have direct or indirect contact with Amala students are suitable to work with children and young people, agree to abide by Amala's Safeguarding and Team Code of Conducts and have basic safeguarding awareness.
- Ensures online safety is incorporated into the organisation's use of IT.

### Communications Coordinator

- Promotes the visibility of safeguarding via relevant internal and external communication channels, such as the website, signages and brochures.

### Designated Trustee Lead on Safeguarding

- Oversees safeguarding in Amala
- Understanding the Amala's safeguarding requirements and responsibilities  
Ensuring the risk register includes safeguarding risks and measures to mitigate

#### Safeguarding and Welfare Policy

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023

risks and is reviewed by the Board/Owner;

- Meeting regularly with Amala's Global Safeguarding Lead (SL) to review and support their work;
- Overseeing a safeguarding implementation plan;
- Supporting the the Global Safeguarding Lead and Chair of the Board in managing allegations of abuse;
- Ensuring findings and recommendations from external safeguarding reviews, safeguarding self-assessment exercises and inspections are taken account of in the strategic planning and the safeguarding implementation plan;

**Safeguarding and Welfare Policy**

**Policy Owner:** Global Safeguarding Lead (Mia Eskelund Pedersen)

**Approved by:** Amala Board of Trustees

**Effective from:** 26 November 2020

**Revision cycle:** Annual

**Last revision:** 9 March 2023