

Education for All Ltd

Safeguarding Policy

SAFEGUARDING & CHILD PROTECTION POLICY

1.1 INTRODUCTION

1.2 Education For All Morocco Ltd (EFA) is committed to actively promoting the safeguarding and child protection of children and young people. As our charitable objects are to provide educational opportunities for children and young people, their safeguarding and child protection is paramount.

1.3 This policy covers all individuals directly associated with Education For All including trustees, Managing Director, Operations Coordinator, all other employees, volunteers, those with partnership agreements and individuals and entities not directly associated with EFA, but who provide services such as donors, consultants, contractors, suppliers, visitors, and trainees. Any breach of this policy may result in disciplinary action, a termination of contract and / or a referral to a relevant authority which may lead to criminal prosecution.

1.4 The policy is non-contractual and does not form part of a contract of employment and may be adapted or amended at any time. EFA may (acting reasonably and depending on the circumstances of each case) adapt, vary, or depart from the application or implementation of this policy and procedure, including any time limits, to reflect the circumstances of each case and to reflect general principles. Any such adaptations, variations or departures from this policy must be agreed in advance by the Trust Board.

1.5 EFA actively promotes the wellbeing of children and young people and seeks to safeguard them from all forms of harm and abuse (physical, emotional, sexual, neglect, exploitation) and harassment. We understand we work in a trauma informed context and recognize that some children and young people will be at greater risk and may need greater support. Some children and young people, may be particularly vulnerable and require additional support e.g. those who lack capacity, are disenfranchised, or face additional barriers to their own safety and interests either through a mental, physical, circumstantial cause or due to their own experiences of being harmed or exploited. Whilst all children and young people have the same rights to protection, safeguarding and opportunities, EFA adapts its safeguarding practice to ensure full compliance with Morocco law.

1.6 The terms **child safeguarding** and **child protection** are often used interchangeably. For the purposes of this policy: **safeguarding** is primarily concerned with the active promotion of the welfare of children and young adults, to enable them to lead fulfilled lives and have the best possible life outcomes. This often involve curriculum developments, early interventions, links with external agencies (where possible) in response to medical issues,

SEND requirements etc. **Child Protection** is more frequently involved with the need to report to an external agency because of an immediate threat of or actual harm to a child.

1.7 There are four main elements to our Safeguarding and Child Protection approach:

1.7.1 Prevention e.g. actively promoting a safe culture, in terms educational and pastoral opportunities for students to fulfil their potential.

1.7.2 Protection e.g., following agreed procedures in terms of the recruitment of staff, ensuring risks are mitigated, and all staff, volunteers etc are suitably trained to actively promote a safeguarding culture and know how to respond appropriately to any safeguarding concerns

1.7.3 Supporting students, their parents, staff, and where appropriate specific interactions for those who may be at risk of harm (considering considerations of culture, disability, legal compliance, history).

1.7.4 Working with parents, expert agencies, staff, professionals in Morocco and the UK to offer expert research-based advice and information.

1.8 The recruitment of all trustees, Managing Director, Operations Coordinator, staff and volunteers, partnership agreement staff must follow all safer recruitment protocols and undertake an effective induction process including appropriate safeguarding training.

1.9 This policy provides a high-level summary of EFA's approach to safeguarding and child protection. For a more detailed understanding of our approach at an operational level the policy should be read alongside the policies.

1.9.1 Code of Conduct

1.9.2 Safeguarding & Child Protection Protocols for Staff

1.9.3 Safer Recruitment & Induction Policy

1.9.4 Managing Allegations

1.9.5 Donation Acceptance and Refusal Policy

1.9.6 Data Protection Policy

1.9.7 Gender Equality Policy

1.9.8 Human Trafficking and Modern Slavery Policy

1.9.9 Social Media Policy

1.9.10 Volunteer Policy

1.9.11 Visitor Policy

1.9.12 Health & Safety

1.10 When developing this policy EFA considered the principles established by the UK's Children Acts 1989, 2004, Education Act 2002 (section 157), Children and Families Act 2014, Sexual Offences Act 2003, Equality Act 2010, Working Together to Safeguard Children (2018) & Keeping Children Safe in Education (2023). Other guidance used to shape policy and practice includes; What to do if you are worried a child is being abused March 2015, Guidance for Safer Working Practice for Adults who Work with Children and Young people in Education Settings (October 2015), Child sexual exploitation: Definition and a guide for practitioners DE 2017, Prevent Duty Guidance: for England and Wales June 2015. The United Nations Convention on the Rights of the Child 1991.

1.11 TRUSTEE & MANAGING DIRECTOR RESPONSIBILITIES

1.12 To name a suitably qualified Safeguarding Trustee and ensure their identity, contact details and duties are well publicized (EFA website and in all partnership projects).

1.13 To provide the name, contact details and safeguarding duties of the Managing Director for reporting purposes and ensure that they are well publicized (EFA website and in all projects).

1.14 To actively promote the delivery of a robust approach to safeguarding in all EFA partnership projects.

1.15 To inform everyone who participates in EFA activities and people with whom we work, about the standard of behaviors they can expect from our staff and representatives and how to raise concerns.

1.16 Ensuring all staff and representatives are aware of this policy and expectations on the prevention, reporting and response to allegations of all forms of abuse as defined within this policy.

1.17 Ensure all trustees have sufficient safeguarding knowledge to be able to provide strategic challenge; to test and assure themselves that the safeguarding policies and procedures described in Partnership Agreement are being implemented effectively, by arranging appropriate training.

1.18 To ensure the Managing Director and Operations Coordinator has sufficient safeguarding knowledge to be able to ensure that the safeguarding aspects of the EFA Code of Conduct and partnership agreements are being efficiently and effectively implemented, and to be able to report effectively to the trustees.

1.19 To ensure that the Trust Board is made aware of any proven incident or allegation (anonymized where appropriate) which has implications for the safeguarding, staff behaviour policy or procedures.

1.20 PARTNERSHIP AGREEMENTS

1.21 Education For All chooses to:

1.22 Only work with partners, individuals, groups', or organizations who adopt similar principles to prevent exploitation and abuse in their own policies. These must include clear obligations requiring their staff and representatives to be suitable to work with Education For All, demonstration of their commitment to actively promote the wellbeing of children and young people, maintain safeguarding compliance and to act robustly when reports of breaches are received.

1.23 Where partners, individuals, or organizations do not have their own written policies, or do not meet Education For All's BSO standard, they must formally agree within the partnership agreement to implement the standards in EFA policies.

1.24 If a partner aspires to this but lacks the necessary knowledge and / or expertise, EFA may provide specialist advice and support within its partnership agreements to support the development of effective safeguarding culture in all EFA projects. The overarching objective being to ensure that all Education For All partnerships are designed with the intention of maximising the safeguarding and wellbeing of children and young people.

1.25 All EFA's partnership agreements include terms that allow for effective oversight and scrutiny of a Partner's safeguarding and child protection arrangements and allow for any failure of the partner to do all they can to prevent, report and respond appropriately to allegations of sexual exploitation and abuse, to constitute grounds for EFA to terminate their partnership.

1.26 If there are any concerns about any partner's compliance with or observance of any of the agreed standards, the person with responsibility for any partnership agreement must contact the Managing Director or in their absence, the Operations Coordinator within 48 hours.

1.27 Employees who manage partnership agreements between EFA and

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partners, individuals, or organizations which brings the latter into contact with people with whom we work (including holding data and/or working with images of people with whom we work, particularly children) must ensure that the partnership agreement includes an obligation on the part of the partner to maintain robust and effective safeguarding arrangements, which accord with this policy.

1.28 MANDATORY INCIDENT REPORTING AND RESPONDING

1.29 It is the duty and the responsibility of all staff and representatives to report any allegations, concerns or inappropriate behaviour and breaches of this policy. While staff are obligated to report safeguarding concerns, nothing in this policy should be read as compelling or requiring a victim/survivor of abuse to disclose their own experiences of abuse or exploitation against their wishes.

1.30 All staff and representatives must be aware that any allegation of abuse or exploitation of children, or young people made against them will be robustly investigated.

1.31 Staff must report any allegations and concerns about other staff, partnership agreement staff, volunteers etc. to the Managing Director within 24 hours, either by email or phone. This duty to report and share information includes concerns related to incidents of abuse or exploitation that might have occurred in the past, however long ago or concerns where the identity of those involved is unknown.

1.32 If the allegation is a safeguarding or child protection concern about the Managing Director, Nominated Safeguarding Trustee or Chair of Trustees should be informed within 24 hours.

1.33 It is essential that confidentiality is maintained at all stages of the reporting process when dealing with safeguarding concerns. Information relating to the concern and subsequent incident management will be shared on a need-to-know basis only and should be always kept secure. A breach of confidentiality related to a safeguarding incident or complaint may result in disciplinary action.

1.34 Staff must report any allegations and concerns about other staff, partnership agreement staff, volunteers etc. to the Managing Director within 24 hours, either by email or phone. This duty to report and share information includes concerns related to incidents of abuse or exploitation that might have occurred in the past, however long ago or concerns where

the identity of those involved is unknown.

- 1.35** If any individual feels unable to raise a concern through the usual reporting processes under this policy (for instance because they feel their concern has been previously raised and not acted upon), they should raise their concern(s) in accordance with the EFA Whistleblowing Policy either through a Named Person listed in the Whistleblowing Policy or via the website Whistleblowing service.
- 1.36** EFA recognizes that the decision to report a concern can be difficult or potentially unsafe. We will support those who raise concerns and will not tolerate the harassment, bullying or victimisation of staff for doing so, regardless of whether the concern is upheld. No staff member or representative reporting a legitimate concern under this policy will have their continued employment or involvement and opportunities for future promotion or training prejudiced as a result. Any victimisation will be treated as a disciplinary offence.
- 1.37** All concerns about the welfare of children and young people will be reported in accordance with statutory guidance to the relevant agency. In other jurisdictions, reports will be made to the relevant authorities, unless to do so would place people at an unacceptable risk of additional harm.
- 1.37.1** Where appropriate, EFA will report safeguarding concerns to the Charity Commission and will meet its obligations to report such incidents to donors.
- 1.37.2** By consideration of referral to law enforcement authorities for criminal investigation, where appropriate to do so.
- 1.37.3** By consulting with an appropriate UK Local Safeguarding Partnership, or equivalent expert organisation such as the NSPCC or ISS (CIC).
- 1.37.4** By an internal EFA investigation, in accordance with this policy and (if relevant) disciplinary procedures, should a referral to statutory agencies be inappropriate, internal action may be recommended by the statutory agency concerned or at the conclusion of an investigation by a statutory agency. Such an investigation may result in dismissal, ending of voluntary roles and/or the termination of partnership agreements or other forms of relationships.
- 1.37.5** EFA will comply with its legal obligations to refer individuals to the relevant barring authorities should there be evidence that an

individual has harmed a child or placed a child at risk of harm.

1.37.6 These arrangements also apply to any representative or staff of any partner agency with whom EFA has agreed safeguarding protocols.

1.78 The Managing Director will commission and oversee all investigations into safeguarding concerns, including alleged breaches of this policy, and will issue guidelines to ensure that all investigations are conducted with a victim/survivor centred approach. Where an allegation relates to the breach of this policy by the Managing Director, the Chair or Vice Chair of Trustees will make appropriate arrangements for an investigation.

1.79 In all cases suitably trained independent investigators will be commissioned to conduct any investigations.

1.80 Where a member of staff or representative leaves EFA prior to the commencement or completion of a safeguarding investigation and any subsequent disciplinary process, the process will continue, and a clear outcome will be recorded.

1.81 We recognise that reporting can be challenging and difficult for those who have been subject to abuse, neglect, or exploitation. EFA will seek to ensure that the reporting of safeguarding incidents is a process that should not create additional distress for victims/survivors.

1.82 Victims/survivors have the right to decide whether they wish to be involved in any investigation. Where a victim/survivor does not wish to participate in an investigation, EFA will assess the situation and consider whether an investigation should be undertaken.

1.83 DEFINITIONS

DEFINITIONS	
Child:	Every human being below the age of 18 irrespective of the age of the majority.
Child Protection	
Child abuse:	Or maltreatment constitutes all forms of physical and/or emotional ill treatment, sexual abuse (all sexual activity with a child is considered child abuse), neglect, or negligent treatment or commercial or other exploitation, resulting in actual or

	potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Child abuse can occur online and/or through the use of social media.
Domestic (coercive) abuse	Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.
Emotional abuse	Any type of abuse that involves the continual emotional mistreatment of a child. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.
Financial Abuse	Theft or financial exploitation for another’s gain, such as Modern Slavery, deception to obtain or use funds, the purchase of unwanted or unnecessary goods or services, or coercion to make donations.
Child Sexual Abuse	Forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. This may involve physical contact, including assault by penetration or non-penetrative acts. They may include non-contact activities, such as involving children looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). The actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions.
Physical Abuse	Actions that lead to physical harm or injuries including potential physical

	harm. Examples are being pushed, punched, kicked, bitten, spat at, burnt, restrained, or being struck with objects. There may be single or repeated incidents.
Psychological abuse	The regular and deliberate use of a range of words and non-physical actions used with the purpose to manipulate, hurt, weaken or frighten a person mentally and emotionally; and/or distort, confuse or influence a person's thoughts and actions within their everyday lives, changing their sense of self and harming their wellbeing.
Child Exploitation:	The use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.
Neglect	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.
(Sexual) Harassment	<p>Unwanted conduct which is either related to a relevant protected characteristic (race, gender etc), or is of a sexual nature, where the conduct has the purpose or effect of violating the victim's dignity or creating an environment that is intimidating, hostile, degrading, humiliating or offensive. Harassment is unlawful under the Equality Act 2010.</p> <p>Unwelcome sexual advances (without touching). It includes requests for sexual favours, or other verbal or physical behaviour of a sexual nature, which may create a hostile or offensive environment.</p>

(An imbalance of) Power	Having influence, authority, or control over people and/or resources.
Abuse of Power	<p>Improper behaviour by someone with more power (or someone in a position of trust) for their own benefit or satisfaction and to the detriment of a person with less power, e.g., someone in a junior role or in a position which is dependent on EFA funding.</p> <p>Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.</p>
Transactional Sexual Activity:	The exchange of money, employment, goods, or services for sex or sexual/sexualised activity, including 'sexual favours. Education For All does not make any judgement of those who experience such transactions but recognises the inherent unequal power dynamic and so prohibits staff from exchanging money or anything else for such contact.
Vulnerable Adult/Person	

1.84 POLICY REVIEW

1.85 This policy is owned and evaluated by the Board of Trustees and is reviewed annually.