SAFEGUARDING PEOPLE POLICY

January 2025

Damaris Villanueva, Global Safeguarding Officer

TO REPORT A SAFEGUARDING CONCERN, YOU CAN CONTACT:

- In-country DSL or Focal Point at info@spedalsk.dk Lena Hagelskjær Kristensen
- National Board Safeguarding Lead/Trustee at lt@spedalsk.dk Leif Thuesen
- Global Designated Safeguarding Officer at DSO@leprosymission.org
- Global Fellowship Board at safeguarding@leprosymission.org
- Safecall external independent reporting channel at https://www.safecall.co.uk/file-a-report/[1]

[1] The information you provide to Safecall and agree that they can share will be sent to the Global Designated Safeguarding Officer who will decide on the most appropriate course of action.

THE LEPROSY MISSION

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1. Purpose

1.1 The purpose of this policy is to contribute to TLM's vision of *leprosy defeated, lives transformed* by protecting all individuals who come into contact with TLM through its work, from any form of harm or abuse. It confirms the responsibility of staff and representatives to safeguard people, especially children and adults at risk, in all areas of TLM's work.

1.2 This policy covers protection from sexual exploitation, abuse and harassment (commonly referred to as PSEAH) as well as other safeguarding harms.

This includes harm to people arising from:

- The conduct of staff or representatives associated with TLM
- The design and implementation of TLM's programmes and activities.

This is outlined in more detail in TLM's Code of Conduct which all staff and representatives sign up to.

This policy does not cover:

- Safeguarding concerns in the wider community not perpetrated by TLM or representatives
- Safeguarding the organisation's assets from financial risks like fraud, bribery and corruption

2. Scope

2.1 This is a **global policy**. It applies to all staff across the TLM Fellowship and to representatives whilst engaged with work or visits related to TLM's work, including but not limited to: volunteers, interns, Board members, consultants, contractors, programme visitors, and all who represent or associate with TLM in any way. TLM's partners will also sign up to this policy if they do not have an adequate policy of their own.

2.2 This policy is **applicable to all areas of our work** and seeks to ensure that safeguarding people is prioritised in **every area of work** at TLM.

3. Safeguarding people

3.1 Safeguarding people is the responsibility that organisations have to ensure their staff, representatives and programmes do no harm. Safeguarding people includes safeguarding against the risk of harm, abuse, exploitation and harassment that may be caused by the organisation through its behaviour, activities, projects and programmes, both directly and indirectly.

4. Policy statement

4.1 At TLM we are committed to the safeguarding and wellbeing of all individuals with whom we come into contact, including the people in communities where we work, staff, representatives and partners. This is an expression of TLM's values of compassion, justice, integrity, inclusion, humility and collaboration, and our Christian belief that all people are created by God in His likeness (Genesis 1:26, 27). We therefore believe that every adult and child should be treated with respect and dignity.

4.2 At TLM, we believe all people have a right to live their lives free from harm and any abuse of power, regardless of age, gender, sexuality, sexual orientation, disability, religion or ethnic origin. We recognise that there are unequal power dynamics across the organisation and in relation to those we serve, and that some people might exploit their position of power for personal gain. TLM will follow up on all reports of abuse of power committed by its staff, representatives or partners.

4.3 TLM will not tolerate its staff, representatives or partners engaging in, or being subjected to, **any** form of exploitation or abuse. TLM has a **zero-tolerance** policy towards inaction against all forms of harm and abuse, and seeks to ensure that staff and representatives **do no harm** while working for or with TLM. TLM will follow up on all reports of exploitation and abuse committed by its staff, representatives or partners.

4.4 TLM commits to supporting victims; improving safeguarding capacity; preventing, reporting, responding to and learning from harm and abuse.

4.5 TLM endorses and commits to International Standards on Safeguarding and Human Rights.

5. TLM's approach to safeguarding

5.1 **Safeguarding is everyone's responsibility.** At TLM we commit to:

- **Prevent** harm and abuse as much as possible
- **Report** concerns of harm and abuse when they arise
- **Respond** appropriately to all concerns of harm and abuse
- **Learn** in order to continuously improve our prevention, reporting and response

6. Prevention

TLM will:

6.1 Actively encourage a **culture** where:

- Every individual is treated with dignity and respect
- Every individual is able to participate meaningfully in decisions that affect them
- Power imbalances are identified and discussed honestly. Where power imbalances are abused, this is acknowledged and dismantled
- The potential for harm is proactively anticipated and mitigated
- Speaking up at all levels is actively invited, welcomed and leads to change
- Harm, when it occurs, is met with accountability, repair, healing and closure

6.2 Identify and mitigate **safeguarding risks** at global, Member, project and activity level, recognising particular risks that may relate to factors such as age, gender and disability

6.3 Operate safer **recruiting practices** to ensure all staff, contractors, Board members and volunteers are appropriate for their roles and do not pose a risk to others

6.4 **Design and implement** activities, programmes and projects which ensure that children and adults at risk are protected from risk of harm

6.5 Conduct robust **due diligence with all of TLM's partners** regarding their safeguarding policies and procedures and provide support where needed

6.6 Ensure adequate **human and financial resourcing** of safeguarding

7. Reporting concerns

7.1 TLM will ensure that safe, appropriate and accessible means of reporting safeguarding concerns are available and known to all staff, representatives, partners and the communities in which we work.

7.2 Anyone can raise a concern or complaint. An individual can raise a complaint even if they have no evidence other than their own experience, recognising that harassment, exploitation and abuse usually occur away from the public eye and therefore it can be difficult to produce evidence (e.g a witness).

7.3 **What to do if someone comes to you with a disclosure**

People may indicate in different ways that they or someone else is being harmed. If someone comes to you with this information you should:

- Reassure them that they were right to report the behaviour
- Listen carefully and ask clarifying questions to ensure you report the incident accurately but do not make assumptions or offer alternative explanations
- Do not make promises, especially of secrecy. Keep confidentiality by being open and honest about the fact that you must report your concerns to the appropriate person. Explain to them what you are going to do with the information provided
- In an emergency situation, ensure the immediate safety and well-being of the person
- After the conversation, share the report with the relevant person, according to the process below. Do not attempt to investigate or resolve the matter yourself
- Do not allow personal doubts to prevent you from reporting an allegation

7.4 **Whom to report concerns to**

TLM staff and representatives must report safeguarding concerns at the earliest opportunity and, as far as possible, within 24 hours to any of the following:

- Safeguarding Focal Point (when applicable) NA
- Designated Safeguarding Lead at info@spedalsk.dk Lena Hagelskjær Kristensen
- National Board Safeguarding Lead/Trustee at lt@spedalsk.dk Leif Thuesen

- Global Designated Safeguarding Officer (DSO@leprosymission.org)
- Global Fellowship Board (safeguarding@leprosymission.org)
- Safecall external independent reporting channel at https://www.safecall.co.uk/file-a-report/[2]

Reporting safeguarding concerns is mandatory. This relates to concerns about anyone experiencing harm, but in particular reporting the abuse of a child or an adult at risk. Reporting is strongly encouraged and failure to do so may lead to appropriate disciplinary action.

Staff and representatives who raise a concern in good faith are protected under TLM's Whistleblowing Policy and Procedures.

7.5 **Reporting and TLM's person-centred approach**

In line with the TLM Code of Conduct, if anyone has concerns that any individual has been or is at risk of being abused, exploited, or harmed in any way they must report this immediately in line with the reporting procedures outlined above.

As part of our person-centred approach, victims can choose if, when, and how to make a report and express whether they want TLM to take formal action. There may be occasions where TLM has a duty of care to respond even if the victim does not want to take action. This will be managed on a case by case basis, following clear risk assessments, and the safety and wellbeing of the victim will be paramount throughout.

TLM is committed to taking a person-centred and trauma informed approach to responding to safeguarding concerns. TLM will offer support and, where necessary, reparations, to victims of harm caused by staff or representatives and/or refer them to suitable support services.

[2] The information you provide to Safecall and agree that they can share will be sent to the Global Designated Safeguarding Officer who will decide on the most appropriate course of action.

There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations to how a historical concern can be addressed but TLM will take every reasonable measure to address the concern. TLM will ensure that the safety, dignity and rights of the victim are respected at all times.

8. Responding to concerns

8.1 TLM has zero-tolerance to inaction and will follow up on all safeguarding reports and concerns according to policy, procedure, and legal and statutory obligations.

8.2 We are committed to reporting any incidents to the appropriate regulatory bodies and government departments, as required. Where there is evidence that criminal activity may have taken place we will report to the relevant police and/or child protection authorities if it is safe to do so. We acknowledge that in certain situations there may be a mandatory requirement to report to the police.

8.3 We are committed to carrying out robust internal investigations that protect the rights of all involved, with a particular focus on the victim/complainant and the subject of the concern, ensuring that the wellbeing of all is protected.

8.4 TLM will apply appropriate disciplinary measures to staff, volunteers and contractors found in breach of the Code of Conduct or any related policy as well as any temporary measures to ensure each case comes to conclusion without undue interference.

8.5 TLM is committed to fair treatment of everyone involved in a safeguarding concern, including victims, witnesses and subjects of concern.

8.6 It is essential that confidentiality is maintained at all stages of the process when responding to safeguarding concerns. Information relating to the concern and subsequent case management will be shared on a need to know basis only and will be kept secure at all times. Any breaches of confidentiality will be dealt with seriously and could result in disciplinary action.

8.7 More details on how TLM responds to safeguarding concerns are set out in our Global Safeguarding Procedures.

9. Learning

9.1 At TLM we are committed to learning from safeguarding concerns so that we can continuously improve our practice. A learning review will follow each case and designated persons will be responsible to follow up on any actions that can improve the case at hand before it is closed and safeguarding overall in the medium and long term.

10. Adoption and implementation of this policy

10.1 This policy, the accompanying Procedures and the Code of Conduct set **the standards expected by TLM Fellowship Members, their staff and representatives.** However, it is understood that each Member Country is different and they may contextualise and/or expand on its requirements in their country context in a manner that is consistent with global standards. In the event of discrepancy between country and global standards, the higher standard will apply.

10.2 The **Safeguarding People Procedures supports the implementation of this policy and** sets out the main steps for TLM Members to undertake:

- Signing of the Code of Conduct by all TLM staff and representatives.
- Prevention: safe people; safe programmes; safe use of images and personal data; safe fundraising
- Reporting safeguarding concerns
- Responding to safeguarding concerns
- Learning from safeguarding concerns
- TLM safeguarding responsibilities

10.3 **Responsibility for the implementation of this policy** lies with all staff and representatives, particularly managers, Country Leaders, and Boards. They will be supported by the Global Safeguarding Advisor situated at TLM International Office and the in-country Designated Safeguarding Leads and Safeguarding Focal Points. The Global Designated Safeguarding Officer (DSO) facilitates the response and due reporting of safeguarding case management across the Fellowship.

11. Monitoring this Policy

11.1 **Global Level:**

- Safeguarding will be included in the organisational Risk Register with clear risk owner and mitigating measures in place. The TLMI Board will review this register at least annually.
- Safeguarding will be included as a standing item on the agenda of the TLMI Board and the Designated Safeguarding Trustee and Global Designated Safeguarding Officer (DSO) will provide a report on the implementation of the policy, any concerns that have arisen, and the outcome of any investigations.

11.2 **Member Level:**

- Safeguarding will be included in the organisational Risk Register with clear risk owner and mitigating measures in place. The local TLM Board will review this register at least annually.
- Safeguarding will be included as a standing item on the agenda of the local TLM Board and the Designated Safeguarding Lead (DSL) will provide a report on the implementation of the policy, any concerns that have arisen and outcome of any investigations.
- For countries without a local TLM Board, all aspects of safeguarding policy implementation, will be included in the quarterly reports submitted to the Global Fellowship Board by the DSO.

12. Breach of this Policy

12.1 Anyone found to have breached this Policy will face appropriate action from TLM according to the limit of our authority. The consequences may amount to one or more of the following (this is not an exhaustive list):

- Disciplinary action, which could amount to dismissal for staff
- Termination of engagement for Board members, volunteers, and other representatives.
- Termination of contract for Consultants/contractors

- Suspension/withdrawal of funding/support and ending the relationship with TLM for Members, Partners and Suppliers
- Matters reported to law enforcement and other agencies (where is it appropriate to do so)

13. Revision

13.1 The Safeguarding Policy will be reviewed every three years to ensure compliance with international standards and updated legislation, as well as incorporating lessons learned.

13.2 The Procedures may be updated more frequently if internal or external circumstances significantly change and to ensure high standards of practice.

14. Key information which relates to this policy

14.1 Glossary of terms used in TLM Safeguarding People Policy

14.2 Types and Signs of Harm and Abuse

14.3 International Standards on Safeguarding and Human Rights

14.4 Safeguarding Incident Reporting Form

15. Related policies

Ansvarligheds- og adfærdskodeks I TLM-Danmark oktober 2026
Safeguarding Code of Conduct
Safeguarding People Procedures
Bullying and Harassment Policy
Whistleblowing Policy and Procedures
Privacy and Data Protection Policy

Version Control

Date	Version	Summary of Changes	Reviewed by
2008	1.0	First edition – Child Protection Policy	-
April 2018	2.0	• Review and update • Title changed to Safeguarding Policy	Jannine Ebenso, Head of Quality Assurance
November 2020	3.0	• Review and update • Title changed to Safeguarding Children and Vulnerable Adults Policy 2020	Damaris Villanueva, Head of People and Safeguarding
January 2025	4.0	Review and update: • Language simplified from previous version • Terminology change: *vulnerable adult* replaced by *adult at risk* • Annexes linked as separate documents in order to keep the policy short • Policy restructured to follow safeguarding cycle: prevention, reporting, response, learning • Explicit reference to Protection from Sexual Exploitation, Abuse and Harassment (PSEAH), in line with increasing legal / regulatory requirements for this in several TLM countries • Definitions of harm and abuse in separate document – updated based on consultation • Increased focus on survivor or victim centred approach • Introduced zero tolerance to inaction on safeguarding concerns • International DSO telephone number has been removed • Additions to Procedures document: - Additional guidance on Global Fellowship management of high level safeguarding cases - Links to new TLM resources on safeguarding risk assessment safeguarding investigations - Increased possibility and expectation for contextualisation by Members	Damaris Villanueva, Head of People and Safeguarding Review led by: Julia Kragulj, Global Safeguarding Advisor

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