SAFEGUARDING PEOPLE PROCEDURES

2025

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THE LEPROSY MISSION

leprosymission.org

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Introduction

These Procedures should be read together with the Safeguarding People Policy 2025 as they outline steps to be taken by TLM Members and Affiliates to implement that Policy together with other aligned organisational policies. The following sections will guide the Members and serve them as an implementation manual.

This TLM Fellowship Procedures document covers all areas of safeguarding. Not all sections will be relevant to every TLM Member. At the beginning of each section is a statement indicating whether the section is **relevant to all Members, most relevant to Implementing Countries or most relevant to Supporting Countries**. TLM Members will, in coordination with the Global Safeguarding Advisor, include the sections relevant to their situation and will provide local contextualisation.



Sections marked with this icon indicate where **local context** should be added.

This Procedures document is structured according to the Safeguarding Cycle:

1. **Prevention**: prevent harm and abuse as much as possible
2. **Reporting**: report concerns of harm and abuse when they arise
3. **Response**: respond appropriately to all concerns of harm and abuse
4. **Learning**: learn in order to continuously improve our prevention, reporting and response

1. PREVENTION

1.1 Prevention: TLM Code of Conduct

All Members need this section

All staff and representatives will be required to sign and abide by the **Safeguarding Code of Conduct** as a condition of their engagement with TLM.

The Code of Conduct represents the **minimum standards** and these standards must not be removed but may be added to depending on country context.

1.2 Prevention: Safe People

All Members need this section

Safeguarding is integrated into all selection, recruitment, on-boarding and other HR processes through the full life cycle of all staff and representatives.

Safer Selection and Recruitment

Hiring managers, in collaboration with HR personnel, will ensure that:

- A Role Risk Assessment is conducted resulting in a risk rating (low, medium or high risk) for each role. According to the assessed risk level, the appropriate mitigation measures will be put in place. The Line Manager and HR will review the role risk assessment at least once every three years OR when there is a significant change to a role.
- All **job descriptions and job postings** must **state** that **TLM has zero-tolerance** for abuse and exploitation of all people and that successful candidates are expected to understand and comply with the Safeguarding policy and other related policies. Suggested wording for each role risk level can be found in the Role Risk Assessment.
- All **job descriptions and job postings must detail responsibilities**, including:
    a. The qualifications and experience required, and any additional criteria if working directly with children and/or adults at risk,
    b. what background checks and references will be required for this role; and
    c. the competencies and qualities that the applicant should be able to demonstrate when in direct and/or indirect contact with children and adults at risk. These will be assessed during the selection process.

- **Candidates selected for an interview** will be sent copies of the TLM Safeguarding Policy and Code of Conduct together with the invitation for the interview.
- At least one member of the panel or, where possible, all members of the **recruitment panel** must have had training in safeguarding and will undertake the responsibility to include specific, standardised Safeguarding questions in interviews (examples can be obtained from DSO@leprosymission.org or the HR Hub). Hiring managers should pay particular attention to gaps in an individual's employment history and frequent changes of employment.
- All **candidates selected for an interview** will be required to provide proof of identity (passport, driver's license, original ID documents) and certificates to prove professional qualifications at the time of interview. Permission should be sought to take a copy based on national data protection regulations. Upon conditional offer of employment, successful candidates will be required to provide originals of these documents to be checked against these copies. The HR personnel responsible should confirm the documents are genuine, original, and unchanged, and belong to the candidate who has provided them.
- Prior to commencing work or within the first week, all new staff and representatives will be required to read and **sign** the **Code of Conduct** and to submit a completed **Self-declaration of criminal and disciplinary record**. Signed copies will be kept with HR records.
- Successful candidates in **medium** or **high-risk roles** will be required to undertake a **mandatory police background check** (appropriate to the role, responsibility, and access) for their current country of residence, and all other countries they have resided in within the last 5 years. The application process for criminal records checks, police background checks or 'Certificates of Good Character' varies from country to country.
- HR will obtain a minimum of **two (2) professional references,** covering a total of at least three years of employment if possible, for all prospective staff and representatives (e.g. from the individual's current line manager, human resources department, previous line manager) along with a **character reference.** Referees will be asked if they have any concerns regarding the candidate's previous conduct, particularly with children and vulnerable adults. References from family members or friends will not be accepted.
- In addition, references should be verified **in person or by phone** by the recruiting manager or the HR personnel responsible when:
    a. They are not provided through an official organisation email address or channel

b. There is a reason for concern
c. There is incomplete information
d. There is something unclear
e. There is a refusal to follow the reference form provided

Safe on-boarding and other HR processes

- All new hires as staff or representatives will go through an **on-boarding process**. All staff and representatives must have a **mandatory safeguarding orientation** within two weeks of them starting or as soon as it is reasonable and this should be recorded on their HR personnel file
- The **end of probation** review with the individual's Line Manager will include a discussion of the commitment and understanding of the staff or representative to following TLM safeguarding requirements
- Mandatory **refreshers** will be provided to staff and representatives annually
- Safeguarding policy compliance, adherence, briefings, and Safeguarding role risk assessment reviews and learning will be incorporated in formal and informal **line management meetings**, including at **appraisal**
- Safeguarding questions will also be incorporated at **exit interviews**

1.3 Prevention: Safe Programmes

Safe programmes refers to all activities, projects, programmes and services of all sizes, run across the Fellowship. This also includes hospitals, VTCs, research centres, fundraising activities and any other operations that TLM runs.

1.3.1 Safeguarding Risk Assessment

This section is most relevant for Implementing Countries

Safeguarding risk assessment applies always but in particular whenever our projects or activities bring us into contact with children or adults at risk through direct or indirect provision of goods and or services.

TLM staff and representatives will conduct a Safeguarding Risk Assessment prior to any project, programme, event or fundraising activity that brings us into contact with children or adults at risk or when general safeguarding risk may be identified. A mitigation plan, with related budget lines, will be produced to address each risk identified. It is crucial to monitor this risk assessment

and mitigation plan regularly (e.g. for projects, as part of the mid-year and annual reporting process) and update it as more information is gathered or circumstances change. More information on safeguarding risk assessment can be found in the Safeguarding Risk Assessment Guide.

1.3.2 Feedback and Complaints Mechanisms

This section is most relevant for Implementing Countries

Accountability to all and in particular to children, people at risk, and communities in which TLM works in is an essential component of good programming. TLM will provide **accessible and context-specific feedback and complaints mechanisms** through which people can raise concerns or complaints.

This includes:

- Involving programme participants, children and adults at risk in the design of these mechanisms to make sure they are appropriate to age, gender, local culture and language as well as being accessible.
- Informing programme participants, children, adults at risk and their families in a context-specific way about the Safeguarding Policy and expected behaviour of staff and representatives under the Code of Conduct.
- Provision of suitable and accessible mechanisms such as complaint boxes, confidential sessions, hotlines, confidential email addresses and safe areas for children and adults at risk, including people with disabilities, to access.

1.3.3 Safe Working with Partners

This section is most relevant for Implementing Countries

TLM Partners[1] should have also appropriate safeguarding policies, procedures and code of conduct which will be examined before entering into a partnership agreement. An initial **Partner**

[1] TLM's definition of partners includes local governments. While we cannot compel them to sign TLM's policies or code of conduct, we should make sure, as a minimum, that government officials we engage with are aware of it and understand its content.

Assessment and regular **Partner Audits** will be carried out**,** which will include safeguarding as part of the due diligence process of a prospective or current partner organisation.

When a partner does not have appropriate safeguarding standards, they should abide by TLM's policy, procedures, and the Code of Conduct until such time they have their own. In the event of a discrepancy between policies and procedures, the higher standard will apply.

Where needed, TLM will **support its partner organisations** to develop safeguarding policies of their own and support training of their staff in safeguarding.

All **partnership agreements** will contain clear guidance on safeguarding and a code of conduct. The authorised representative of the partner organisation must sign TLM's Code of Conduct which will form part of the terms and conditions of the partnership agreement. The wording to be inserted into partnership and contractual agreements for recipients of TLM funding or services will follow this guideline:

I) TLM Denmark seeks to work with partner organisations who share its commitment to the protection of children and adults at risk.

II) TLM Denmark and the partners: TLM Trust Bangladesh, TLM Ethiopia, TLM Nigeria, TLM Nepal, "Banglabørn" and "Partners" will ensure that:

- they have adequate policies and procedures in place to safeguard all those involved in, or impacted by, their activities from all forms of harm, abuse, exploitation and harassment[2]
- their safeguarding policies and procedures are fully implemented and that on-going compliance is monitored to address any potential or actual breaches in an appropriate and timely manner
- all staff, volunteers and other representatives of the organisation are fully aware and understand the safeguarding policies, procedures and requirements and are provided with appropriate training and guidance to ensure that they can comply
- there are accessible and appropriate mechanisms for programme participants, staff and others to report safeguarding concerns and that all safeguarding

[2] If the partner does not have policies and procedures that meet minimum standards, they should adopt TLM's until they have developed their own, and this should be stated in the partnership agreement.

reports are taken seriously and receive a rigorous and timely response that ensures the safety and well-being of all those impacted

- if, in delivering the activities, they work with other implementing partners, service providers or other third parties, they will ensure that they also comply with minimum safeguarding standards

III) In the event that TLM Denmark or one of the partners fails to comply with these agreements, either partner has the right to pause or terminate the partnership agreement and withdraw any associated funding.

1.4 Prevention: Safe use of Images and Personal Data

All Members need this section

TLM has a duty of care to the people and communities it works with to ensure that published images and personal data do not increase the risk of any harm to anyone. Therefore, any depiction of any person using their image or personal information in TLM publications and social media, should protect their identity, preserve their dignity, and be accurate, balanced, and fair.

The following is how to safeguard everyone, particularly children and adults at risk, from the risk of harm, abuse, exploitation and harassment.

- People should **always be portrayed with dignity**. People should always be fully clothed (no partial or full nudity) and photos should not be sexually provocative. If there is doubt about the appropriateness of using a particular image, staff should seek guidance from their Designated Safeguarding Lead.
- Any **depictions or publications** featuring children and adults at risk **must be assessed** to ensure that there is no risk of harm that may occur to them because of access, storage or publication. No personal information that could put a child or adult at risk of harm should be stored or posted in TLM's public-facing media (social media, websites, publications or press releases). The assessment of appropriate material should be made at the content gathering phase.



- *Some risks may not be immediately obvious. For example, women being photographed in a women's group without veils – who would typically be seen veiled in public.*

- Any **non TLM staff media personnel, journalist or photographer** gaining access to children and adults at risk at projects supported by TLM must be fully briefed by a Designated Safeguarding Lead prior to the trip and provide a police check from their

country of residence that is not more than a year old (renewed annually) that is clear of criminal convictions against children and adults at risk. They should sign the Safeguarding Code of Conduct prior to the trip. A risk assessment should also be carried out prior to the trip to ensure mitigation measures are put in place to prevent any risk of harm to children, adults at risk and any other person. As with other visitors to TLM programmes and activities, they should be accompanied by a local TLM member of staff or local partner at all times.

- Before **photographs of any subject**, particularly children or adults at risk, are taken and images used for publicity, fundraising or marketing purposes, written or recorded informed consent must be obtained and documented on TLM's Informed Consent form.
- Informed consent means that TLM has provided the subject with a reasonable knowledge of the risks involved, potential consequences and available alternatives. **Informed consent is valid for 5 years**, after which time it must be renewed if TLM wishes to continue to use photos or personal information of that subject. A disclaimer must be included that explains that although TLM may remove pictures or videos from our digital platforms we cannot control where or who may have saved these externally.
- **In the case of all children**, permission from their parent or guardian must be obtained on the Informed Consent form. For those between the ages of 12 and below the age of 18, their consent should be obtained as well on the Informed Consent form. Children aged 7-11 shoud be asked "do you want your picture taken?"
- **Signed informed consent** forms should be filed in a secure location (preferably ResourceSpace) and paper copies destroyed.



- **Real names MUST NOT be used for children.** Always use pseudonyms in images and stories about children. In the rare exception where it is thought that there is a justification for real names of children to be used and full consent has been obtained, this must always be approved by the global DSO prior to use.
- **Real names may be used for adults, but not in high-risk situations (e.g. when the use of their real name may put the adult at risk by facilitating identification).** The **informed consent** form gives them the **option** to use their real name or a pseudonym.
- **Third parties** requesting the use of visuals or other materials belonging to TLM should be required to agree in writing to Safeguarding conditions included in the Safeguarding Policy and Procedures regarding the proper use of the materials. Wherever possible, images should be accompanied by captions that are relevant to the image.

- TLM may use **photos and stories provided by its partners** as long as safeguarding provisions have been used in obtaining full informed consent from the subject. The photos and stories should be relevant to TLM programmes and operations.

1.5 Prevention: Safe fundraising and people at risk

This section is most relevant for Supporting Countries

TLM staff and representatives will conduct a Safeguarding Risk Assessment prior to any fundraising event or activity that brings us into contact with children or adults at risk. A mitigation plan will be produced to address each risk identified.

The Leprosy Mission recognises that **some supporters may be at risk** in the context of how TLM interacts with them, because of their personal circumstances. This might be because they are in a vulnerable circumstance (for example have a medical condition, or are experiencing a stressful time), have particular language or communication needs, do not have the mental capacity to make a financial decision, or just need more time, help and patience to make a decision about whether to donate.

All of us operating on behalf of The Leprosy Mission - whether staff or representatives - need to take extra care when accepting funds from people who are potentially vulnerable, and who might require additional care and support to make an informed decision before making a gift or donation. TLM must do all it can to ensure that a person making a donation is aware of what they are doing, and the amount being donated.

If you do have any concerns about the vulnerability of a person who gives you a donation (whether by phone, in person or via post), please refer to Safeguarding Supporters at Risk document.

TLM must always treat every donor with the utmost respect, and it is essential that it responds to any situation sensitively.

1.6 Prevention: Safe working with suppliers

All Members need this section

TLM Suppliers should be able to demonstrate that they comply with all statutory guidance for their sector and that they have well-managed arrangements in place to protect children and adults at risk. TLM will reserve the right to not engage or discontinue a contract of services with a

supplier if it is known that they are not committed to safeguarding or they do not meet minimum standards. This is also a part of what is generally known as responsible procurement.

2. REPORTING

2.1 Reporting: The need to be alert

All Members need this section

Staff and representatives, especially those who have direct or indirect contact with children and adults at risk, should always:

- Be alert to potential indicators of abuse, neglect, exploitation or harassment and recognise that a child or adult at risk may be in need of help
- Be alert to the possible risk that TLM or its representatives may pose to children and adults at risk because of the culture of trust
- Be able to respond appropriately to safeguarding concerns
- Ensure their behaviour complies with the Safeguarding Code of Conduct

2.2 Reporting: Receiving disclosures – general staff response

All Members need this section

People may indicate that they or someone else is being harmed in several ways. 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 no make promises, especially of secrecy. Be 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 that the immediate safety and well-being of the person are secured

- After the conversation, share the report with the relevant person, according to the process in section 2.3. Do not allow personal doubts to prevent you from reporting an allegation and do not attempt to investigate or resolve the issue yourself.

2.3 Reporting: How to Report

All Members need this section

If the concern involves a staff or representative of TLM, or is connected to TLM's operations or activities, there are various reporting options available:

- Firstly, you should use **your nearest most appropriate safeguarding contact** among one of the following:
    a. **The Safeguarding Focal Point** of the project (if applicable) (contact details should be prominently displayed at the project location) NA
    b. **The Designated Safeguarding Lead (DSL)** at info@spedalsk.dk Lena Hagelskjær Kristensen (contact details should be in the staff handbook and prominently displayed at the country office and project locations)
    c. **The Global Designated Safeguarding Officer** at DSO@leprosymission.org or UK mobile no. +447775490823
- Alternatively at **Board level,** you can report to one of the following:
    a. **Safeguarding trustee in the country** (if applicable) at lt@spedalsk.dk Leif Thuesen
    b. **Global Safeguarding Trustee at** Safeguarding@leprosymission.org
    c. Lastly, TLM has an **independent hotline**[3] that can be used if none of the above seems appropriate to your concern: **file a report at** https://www.safecall.co.uk/file-a-report/
- When **the victim may need medical attention**, you must **seek to facilitate this** immediately by contacting the nearest and most appropriate medical service following your country guidelines and **must** inform as soon as possible the appropriate safeguarding appointed person nearest to you as per the options shown above

[3] 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.

- Channels for reporting safeguarding concerns are to be displayed at TLM project offices in-country. This must include how to report concerns raised by staff, representatives, partners, programme participants and/or community members

3. RESPONSE

This section refers to actions taken by **designated safeguarding personnel**, in accordance with the Reporting and Response Flowchart, after a concern has been raised.

3.1 Response: Safeguarding incident report form

All Members need this section

All Safeguarding concerns should be recorded on the Safeguarding Incident Reporting Form.

- Regardless of the channel in which the concern was raised, a copy of this form should be sent under confidential cover to the named Designated Safeguarding Lead as soon as possible and ideally within 24 hours. The Designated Safeguarding Lead must immediately inform the Global Designated Safeguarding Officer, who will support the coordination of the response
- Electronic copies of the forms must be saved in a protected drive and paper copies are access-restricted and kept securely under lock and key
- Safeguarding Incident Reports should always be kept confidential i.e. only shared with those who need to know

3.2 Reporting to authorities

All Members need this section

If the alleged matter is considered a **criminal offence in your country**, a report may be made to the **local law enforcement agency** if it is safe to do so. Reports are usually made by the victim(s) and/or their families or care-givers. Alternatively, TLM can do so with the victim's consent if they are able to provide such consent and/or if such reporting is mandatory in your country. Any decision by TLM not to report a possible crime against a child or adult at risk and/or where reporting is legally mandatory, must be based on risk and is a high level decision that must be confirmed by the local and international Board as well as by the Global DSO and must be well justified and documented.



All Members should add information here about national legislation and regulations relating to reporting safeguarding concerns to authorities and regulators.

***Implementing Countries** should add a link to their up-to-date:*

"Ansvarligheds- og adfærdskodeks I TLM-Danmark oktober 2026".

3.3 Response: After the report is raised – Internal response.

All Members need this section

In all cases, the first priority is to secure the immediate safety of the victim and to ensure that any immediate medical needs are met.

The DSL or the Global DSO (depending on the channel in which the concern has been raised) will inform each other of any concern that has come up **immediately**. All concerns are also sent to the Safeguarding Trustee at the national and global levels.

The roles of different designated personnel in the internal response process are outlined in the following table.

Local DSL:

- Works with the support of the DSO/safeguarding advisor in the implementation of the planned agreed response
- Develops a risk assessment with the support of the DSO/safeguarding advisor
- Registers (Safeguarding Incident Register) and follows up the case at the country level from beginning to end
- Reports to the Local Board (when in place) and to the DSO on progress
- Responds to queries that may be raised by regulators or funding bodies

National Safeguarding Board Trustee:

- Communicates with the Board when their involvement is required (ideally this trustee should have received training on managing investigations)
- Supports the DSL in defining the planned response to a concern
- Ensures that learning from the case takes place at the Board level

Global DSO:

TLM respects the autonomy of Members. However, in order for TLM to be compliant with donor and regulators' requirements for international oversight on safeguarding, and to assess the interrelated risk associated with all Members of the Global Fellowship, the DSO must:

- Be made aware immediately of all safeguarding concerns across the Global Fellowship
- Agree on the planned response
- Agree to the approach of an internal or external investigation if this is required
- Agree to the timing and content of reports and updates to donors, regulators and the media
- Agree to the case closure

Global Fellowship Board trustee:

- Communicates with the Global Fellowship Board and provides quarterly updates on Global Safeguarding
- Supports the DSO on the right approach for concerns raised and helps assess immediately the risks to the Global Fellowship and the mandatory reporting obligations
- Ensures that learning from the case takes place at the Global Fellowship Board level

More guidance on internal response and investigations procedures can be found in TLM's Conducting Safeguarding Investigations and Managing Safeguarding Investigations manuals.

3.4 Response: People-centred approach

All Members need this section

TLM will take a people-centred approach to ensure that all individuals involved in a safeguarding case are treated with fairness, respect and dignity. In particular TLM will prioritise the rights, needs, and wishes of victims by creating a supportive environment in which the victim's rights are respected and in which the victim is heard and treated with dignity and respect. TLM will promote the victim's recovery and their ability to identify and express needs and wishes, as well as to reinforce their capacity to make decisions about possible interventions.

All actions will be risk-assessed, and decisions taken with the best interest of the victim(s) using the following criteria where the victim has a right to:

- be treated with dignity and respect instead of being exposed to victim-blaming attitudes
- express their wishes regarding the course of action in dealing with the abuse instead of feeling powerless
- privacy and confidentiality instead of exposure
- non-discrimination based on age, disability, ethnicity, sexuality or sexual orientation, status, language, religion

- receive appropriate and comprehensive information to help them make their own decisions instead of being told what to do.

As part of our people-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.

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.

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.

TLM Members will maintain up-to-date lists of referral pathways to trusted and accessible services available in each location where TLM activities are implemented, for victims of harm and abuse.



All Members should add information about Referral Pathways.

3.5 Response: Global Fellowship Accountability Committee (GFAC)

All Members need this section

A **Global Fellowship Accountability Committee (GFAC)** is a temporary committee that may be formed when concerns are raised regarding the conduct of a Country Leader, a Designated Safeguarding Lead or a member of a TLM Member Board, or when the level of the concern(s) raised is very significant and could result in significant impact to the Global Fellowship.

A GFAC, comprising representatives of the Global Fellowship Board, the local Board and any other relevant bodies, is convened with the approval of the International Director and the Global Fellowship Board Chair in consultation with the Global DSO.

The role of the GFAC is to:

- Oversee and monitor the accountability to the Global Fellowship and the potential impact in cross member relationships through the different stages of the case management until its closure
- Ensure due process is followed and review the impact of the findings of an investigation report in high-level cases while making recommendations on the next appropriate steps
- Serve as a sounding committee when complex decisions need to be made

More details of the terms of reference for the GFAC can be found here: GFAC Terms of Reference.

3.6 Response: Variations related to case complexity and Member type

All Members need this section

The process of case management response will vary depending on whether the concern relates to a TLM Member with its own Board, or a TLM Member without its own Board, and depending on the complexity or severity of the case.

Members with Boards	**Members without Local Boards**
• The DSL must escalate all safeguarding concerns to the TLM Global DSO and the Safeguarding Trustee on the local Board immediately • The DSO must escalate any concern to the Global Fellowship Board Safeguarding Trustee who has oversight of all cases • In most cases, the planned response and, if required, the investigation will be led by the local board Safeguarding Trustee, in-country DSL and Country Leader, with the agreement of the DSO and the local Board Safeguarding Trustee. The Safeguarding Advisors will support cases when necessary or required. The DSL will advise the DSO of the planned response and send regular updates to the DSO. The DSO will need to agree to the case	• The DSL must escalate all safeguarding concerns to the TLM Global DSO immediately • The Global Fellowship Board acts as a proxy Board for these countries and therefore the Global Fellowship Board Safeguarding Trustee is notified also immediately to assess both the in-country and global risk of the concern • In all cases, the investigation team will be appointed by the DSO in consultation with the International Director and Safeguarding Trustee, who will work with the in-country team to develop a planned response • Investigations will be led by the DSO/Global Safeguarding Advisor, in-country DSL and Country Leader, with the DSO providing regular updates to the Global Fellowship Board Safeguarding Trustee. The DSL will send regular updates to the DSO and the DSO will need to

closure with the local board when the time comes • In a limited number of cases, the GFAC will be formed. This could include: ○ Where the subject of concern is a Board member or a board member is involved, or the process undertaken by the Board on a case has been queried ○ Where the scale, severity or complexity of the concern poses a significant risk to the Global Fellowship ○ Where there is a conflict of interest	approve case closure with the GF safeguarding trustee when the time comes • In a limited number of cases, the GFAC will be formed. This could include: ○ Where the scale, severity or complexity of the concern poses a significant risk to the Global Fellowship ○ When a Global Fellowship Board member or the International Director is the subject of a concern ○ Where there is a conflict of interest

4. LEARNING

All Members need this section

TLM is committed to learning from safeguarding concerns so that we can continuously improve our practice and prevent escalation and/or repetition of incidents. A Safeguarding Case Learning Review will be completed at the end of each case, with input from all individuals who have been involved in managing the case. The learning review includes learning recommendions and designated persons 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.

5. TLM SAFEGUARDING RESPONSIBILITIES

All Members need this section

Safeguarding is **everyone's responsibility.**

All staff and representatives at TLM have a responsibility to safeguard children and adults at risk in all aspects of their work regardless of their position or role.

Everyone must commit to creating a postive environment where people feel safe and supported and everyone must comply with the requirements of the Safeguarding People Policy and Procedures and the Safeguarding Code of Conduct.

However, there are assigned persons at TLM whose responsibility and authority go beyond this:

5.1 Boards (Global and Local)

All Members need this section

- Ensures a culture of safeguarding that respects and protects children, adults at risk, staff and representatives is cultivated in the organisation, led by the Board and senior leadership
- Ensures that there are robust policies and procedures in place
- Ensures that safeguarding is a standard agenda item at every Board meeting and monitors safeguarding issues at each Board meeting
- Reports serious incidents to the relevant regulatory bodies and local authorities
- Every TLM Board will appoint a Designated Safeguarding Trustee

5.2 Designated Safeguarding Trustee (Global and Local)

All Members need this section

There is a Designated Safeguarding Trustee through whom safeguarding concerns can be brought to the Board. The Designated Safeguarding Trustee:

- Receives data (in a confidential way) from the Global Designated Safeguarding Officer (DSO) and or the Designated Safeguarding Lead (DSL) on compliance with this Policy, Procedures, and Code of Conduct, as well as challenges to managing safeguarding risks in the organisation
- Receives direct reports of safeguarding concerns from their country when the relevant individuals have chosen this option
- Works closely with the Global DSO, Country Leader and the country DSL and meets regularly with the DSL for updates on the safeguarding register
- Together with the DSL, submits a confidential report to each Board meeting
- Ensures that safeguarding is a standard agenda item, raises matters in a confidential manner, and responds to questions from the Board

5.3 Country Leader

All Members need this section

- Sets an example with their leadership
- Ensures that the DSL role and, when relevant, the Safeguarding Focal Point(s) are allocated in-country to the appropriate person(s)
- Ensures that safeguarding is appropriately resourced in-country
- Ensures that the DSL has the appropriate resources, flexibility, and authority to perform their role effectively and, if necessary, that they have the autonomy to reallocate or delegate their other responsibilities when emerging urgent needs related to safeguarding require their attention and action
- Facilitates and promotes the relationship between the DSL, the Designated Safeguarding Trustee in-country, and the Global DSO
- Ensures that the Senior Leadership Team fulfil their safeguarding responsibilities and that the organisation remains compliant to its safeguarding obligations and best practice standards, outlined in the Safeguarding People Policy and Procedures

5.4 All Managers

All Members need this section

- Set an example in their leadership and management
- Promote the Safeguarding Policy, Procedures, and Code of Conduct, and are accountable for its implementation
- Manage risks, prevent and report any safeguarding concerns
- Include safeguarding in team meetings when appropriate (within confidential guidelines), in one-on-one supervisory and line management discussions, and during performance appraisals
- Incorporate safeguarding into regular internal and external programme and organisational evaluations and assessments
- Participate in promoting safe recruitment, selection, on boarding, and HR practices

5.5 Global Designated Safeguarding Officer (DSO)

All Members need this section

TLM has appointed a Global Designated Safeguarding Officer (DSO) from within the International Senior Leadership Team with authority to **oversee the implementation of the Safeguarding Policy and Procedures across the Global Fellowship.**

The DSO works closely with the Global Designated Safeguarding Trustee on the Global Fellowship Board and the Designated Safeguarding Leads from each Member around the Global Fellowship.

The DSO has a global remit and when not available or on leave, there is an identified Deputy DSO.

The DSO supports and monitors the following matters:

- Ensures that the Global Fellowship is compliant with safeguarding legislation and good practices
- Develops, implements and monitors appropriate safeguarding policies and processes
- Ensures that learning from concerns and incidents is incorporated into policy and processes
- Coordinates safeguarding support and training for Members and Affiliates (in collaboration with the safeguarding advisors and DSLs)
- Keeps the TLMI Board fully informed of all safeguarding concerns or incidents
- Manages safeguarding investigations of serious incidents
- Ensures that serious incident reports from around the Global Fellowship are submitted to the Charity Commission of England and Wales
- Receives quarterly safeguarding reports from the Designated Safeguarding Leads (DSL) and summarises them for the TLMI board

5.6 Designated Safeguarding Lead (DSL)

All Members need this section

Each Member and Affiliate, the TLM Shop, and the International Office has a **Designated Safeguarding Lead (DSL).** There should also be a Deputy DSL to support the DSL when they are on leave or otherwise unavailable. The DSL reports directly to the **Country Designated Safeguarding Trustee or to the Board Chair in regards to their safeguarding responsibilities.** The Country Leader should also be part of the direct reporting line, if they are not involved in the

concern raised. For Members without a local Board, the DSL will report to the Country Leader in regard to their safeguarding responsibilities.

The DSL:

- Oversees the implementation of all areas of the Safeguarding People Policy and Procedures in-country and ensures that safeguarding systems and processes are in place and functional
- Is part of the DSL network and receives support from the Global Designated Safeguarding Officer
- Keeps up to date with international and national safeguarding best practice, as well as local laws, policies and procedures
- Advises and supports management and staff on safeguarding policy and processes to ensure safeguarding is integrated throughout the organisation
- Receives reports about all safeguarding concerns, logs them, and informs the DSO of all reports received at the earliest opportunity (and in all cases within 24 hours)
- Collaborates and may lead in the response plan to safeguarding concerns, in agreement with the Global DSO
- Coordinates, supports and advises local Safeguarding Focal Points
- Prepares and submits quarterly safeguarding reports to the Board with a copy sent to the Global DSO
- Prepares safeguarding reports for donors according to their requirements

5.7 Safeguarding Focal Point

This section is most relevant for Implementing Countries

In countries with multiple locations / thematic areas in which TLM operates, there will be location or thematic specific **Safeguarding Focal Points**. Their role includes:

- Supporting the DSL to implement this Safeguarding Policy and Procedures
- Assisting DSLs to meet the training needs of field-based staff and local partners in organisational Safeguarding
- Raising awareness among staff and partners in their project or field location of their responsibility to report all safeguarding concerns
- Receiving safeguarding concerns and escalating them immediately to the DSL
- Making recommendations for enhancing safeguarding prevention and reporting

- Supporting DSL in providing safeguarding briefings to visitors such as consultants, evaluators, visitors, and other relevant people
- Communicating regularly with the DSL in-country and providing them with timely safeguarding activity reports when requested
- Assisting in bringing beneficiary feedback, complaints mechanisms, and risk assessments, to the project/community level



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