



# Policies

KAFEL AID



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## Conflict of interest policy

All staff, volunteers, and trustees of Kafel Aid will strive to avoid any conflict of interest between the interests of Kafel Aid on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

The purpose of this policy is to protect the integrity of the Kafel's decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of volunteers, staff and trustees.

In the course of meetings or activities, trustees will disclose any interests in a transaction or decision where there may be a conflict between the Kafel's best interests and the trustees' best interests or a conflict between the best interests of two organisations that the trustee/s is/are involved with. Hence decision must be taken to eliminate such conflict with appropriate manner.

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## Safeguarding policy

Kafel Aid is a registered charity that works to improve the lives of Eritrean refugees in Sudan, Yemen and UK. We believe that every individual who gain access to our vocational training services should be treated with dignity and respect. Kafel Aid is committed to safeguarding trainees coming into contact with the charity, regardless of gender, ethnicity, disability, sexuality or beliefs.

Safeguarding is everyone's responsibility and all employees and trustees who, during the course of their employment have direct or indirect contact with vulnerable refugees, or who have access to information about them, have a responsibility to safeguard them.

This policy applies to anyone employed directly or indirectly by Kafel Aid and includes trustees, staff, volunteers, trainees and consultants. This policy is available to stakeholders and should be implemented as good practice.

Charity trustees are responsible for ensuring that those benefiting from or working with their charity are not harmed in any way through contact with it. This policy has been approved and endorsed by the Board of Trustees.

### The policy requires to:

1. ensure that Kafel Aid has **safe recruitment policy** in checking the suitability of trustees, staff and volunteers to work with trainees.
2. ensure **safe environments**, checking the suitability of training courses providers in Sudan, Yemen and UK, ensure services are provided in safe environments and that sufficient safeguards are in place.
3. build a **culture** that values and respects refugees and modelling appropriate conduct in line with British values.

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# Investment policy

## Introduction

1.1 Kafel Aid is a registered charity in England established mainly to support vocational education within the Eritrean refugees in Sudan, Yemen and UK to enable them to depend on their skills and competency to make their livelihood.

1.2 The financial objective of Kafel is to at least maintain the real value of the assets whilst generating a stable and sustainable return to fund Vocational education and other programs to alleviate poverty within Eritrean refugees.

1.3 Kafel Aid trustees are responsible of decision-making on investment matters.

## 2. Investment Objectives

2.1 The Charity seeks to produce the best financial return within an acceptable level of risk.

2.2 Kafel Aid adopts a total return approach to investment, generating the investment return from income and capital gains or losses. It is expected that if in any one year the total return is insufficient to meet the budgeted grant making expenditure, in the long term the real value of the Kafel Aid will still be maintained in accordance with the investment objective above.

2.3 Kafel Aid relies on the investment return to fund grant making. However, grants are generally one off awards and the number and value of these may vary depending on circumstances. The trustees understand that this is likely to mean that investment will be concentrated in real assets and that the capital value will fluctuate.

2.4 Kafel Aid's assets should be diversified by asset class, by manager and by security. Asset classes could include cash, property, structured products, commodities and any other asset that is deemed suitable for the Kafel Aid.

2.5 Kafel Aid is expected to exist in perpetuity and investments should be managed to meet the investment objective and ensure this sustainability.

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# Cash Handling Policy

## Scope of the Policy

This policy is to ensure the safe handling of cash receipts. The policy is aimed at ensuring all staff and volunteers know and are confident about handling any cash received. The policy is in accordance with the requirements of the Charity Commission.

### The term “cash” used in this policy includes:

- Notes and coins
- Cheques and vouchers
- Bank orders and credit card receipts

## Policy Statement

- The policy is designed to provide the internal controls needed in this area for the protection of the charity, staff, volunteers and the trustees who are themselves fundamentally responsible for control of the charity’s activities and funds.
- All cash handled by staff and volunteers, must be dealt with so as to ensure its safe custody and mitigate against loss whether through fraud, misappropriation or mistake. This is part of the obligation of trustees and staff to ensure that all assets are used for the benefit of the charity in order to efficiently perform its charitable activities.

## Procedure

### Income in Person

Where requested, a signed, duplicate, pre-numbered receipt / acknowledgement can be given to the person who delivered the cash. The copy of the receipt should remain in the receipt book.

### Fundraising events and Other Cash Collections/Donations

Events planned and organised by staff and volunteers of Kafel Aid should seek to ensure that the trustees and executive director inform staff and volunteers of the need for right and legal procedures in order to keep the event under Kafel Aid direction and control.



Staffs present at any fundraising event on behalf of Kafel Aid must ensure (as far as possible within their control) that the following procedures are carried out:

- Where possible the person collecting on behalf of Kafel Aid should be authorised by the charity's trustees or the executive director.
- When possible, cash collected will be placed in sealed envelopes, bags or buckets and signed over the seal by 2 responsible individuals. For safety, cash must not be counted on site.
- The member of staff/volunteer will ensure that the cash collected is banked as soon as possible.
- Cash must be counted by two people, one of whom must be a staff member, and the count details checked and approved by an authorised staff of Kafel Aid.
- All donated cash should be sorted and counted at Kafel Aid office.

### **Box and Bucket Collections**

- The deliverer of the box should, where possible, ensure that the box is secured in a safe place (e.g. attached to the lead of a cash till) rather than leaving it to the recipient of the box to secure it correctly.
- Boxes/buckets must be opened by two people and the cash must be counted by two people, normally with a member of staff present. The count details checked and approved by an authorised staff.
- Boxes/buckets must be returned to Kafel Aid unopened and all cash sorted and counted at Kafel Aid office.

### **Banking**

- Cheques/cash should be paid into the bank as soon as reasonably practicable. Wherever possible cash/cheques totalling in excess of £1000 should be banked and not left on site overnight.
- The Bank should be reconciled regularly, identifying any standing orders, direct debits, credit/debit card receipts.
- Duties for the recording, reconciliation and banking of cash should be monitored monthly and checked to ensure that all cash received has been paid into the bank.

### **Under no circumstances should:**

- Cheques/cash be put on desks
- Cheques/cash be left on/in workstations
- Cheques/cash be left unattended



When banking or collecting cash the safety of staff is paramount. Staff and volunteers should on no account put themselves into situations of danger, and should give up/not seek

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# Paying staff policy

## INTRODUCTION

Kafel Aid Charity is committed to ensuring a proper balance between:

- (i) paying our staff and others who work for us fairly so that we attract and retain the best people for the job; and.
- (ii) careful management of our charity funds. In so doing we will ensure the greatest effectiveness in delivering our charitable objectives and meeting the needs of our beneficiaries.

## STAFF SALARIES

When determining the salary for a new post, we will collect information about comparable roles in other organisations, preferably within the voluntary sector. We will use this information to benchmark our own salaries, normally aiming to set it at a level that appears to represent the market average. We will also seek advice from colleagues within other organisations when we know they employ people in similar roles.

Each year, the trustees will determine whether the salary points for all staff should be adjusted for the forthcoming financial year beginning 5<sup>th</sup> April, to reflect changes in the cost of living.

The trustees will determine the appropriate increase in the salaries in the context of:

- (i) The charity's financial situation
- (ii) The charity's performance
- (iii) Cost of living adjustments made in recent years

## PAYMENTS TO TRUSTEES

Kafel Aid trustees are not paid for their work as a trustee.



## HOW DECISIONS ARE MADE

The executive director along with one trustee will be responsible for formal consideration of remuneration matters takes place annually to:

- (i) determine and keep under review the salary banding of all staff, using such market comparators as it deems suitable and taking account of the nature of the posts being considered
- (ii) determine and review the remuneration package of the Executive Director
- (iii) determine any annual percentage 'cost of living' change in the payroll
- (iv) determine whether there should be any exceptional consolidated or nonconsolidated pay awards or salary increases for any staff (v) review pension arrangements.

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# Volunteer Management Policy

Kafel Aid relies greatly on the unpaid work of volunteers and values their contribution highly to implement its projects in aiding needy people.

Volunteers are individuals who are willing to give their time and service of their own free will for no financial gain but instead embracing the charity objectives.

## **Purpose**

The purpose of this policy is to ensure that volunteers working for the Kafel Aid participate in a manner that is safe, significant, fulfilling and appreciated in order to deliver charity's humanitarian projects.

## **Policy**

All volunteers shall be treated with respect and with gratitude for their contribution.

Executive director is committed to providing good volunteer management to volunteers within the office and those who volunteer off-site

Volunteers shall carry out duties assigned by the management of the organisation

Executive director should ensure that volunteers obtained enough training before starting work.

All volunteers shall be as far as possible protected from harm and shall be relieved of liability for acts performed in the discharge of their volunteer functions.

## **Procedures**

### **Recruitment**

All volunteers are subject to the screening, approval and probationary procedures before they employed.

Recruitment of volunteers shall take into account the Kafel's commitment to cultural diversity and anti-discrimination.



Executive director in cooperation with the trustees should recruit volunteers

### **Induction**

All volunteers shall be offered appropriate information and training to discharge their functions and successful completion of this training shall be a condition of carrying out these functions

### **Supervision**

All volunteers shall receive appropriate supervision in the exercise of their functions

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# Complaints handling policy

## Introduction

Kafel Aid is a company limited by guarantee incorporated in England. It is also a registered Charity No.1159082, the headquarter is in Birmingham. Kafel Aid employs a number of paid staff and relies greatly on the help and availability of a large number of volunteers.

## Definition of a Complaint

A complaint is a written or verbal expression of dissatisfaction, whether justified or not, about an individual acting on behalf of Kafel Aid, or about policies and procedures.

## Who Can Make a Complaint

Complaints may come from any person or organisation who has a legitimate interest in Kafel Aid.

## Complaints Handling Policy

### Our policy is:

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint;
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint
- To ensure that the relevant people at Kafel Aid know what to do if a complaint is received
- To ensure that all complaints are investigated impartially and in a timely manner
- Any person complained about has the right to know the details of any allegations against them
- To ensure that complaints are, wherever possible, resolved and that relationships are repaired
- To gather information which helps us improve what we do.



## **Data Protection and Confidentiality**

To process a complaint, Kafel Aid will hold personal data about the complainant, which the individual provides and which other people give in response to investigating the complaint. We will hold this data securely in accordance with the Data Protection Act 1998 and only use it to help address the complaint.

## **Responsibility**

Overall responsibility for the policy and its implementation lies with executive director and the trustees.

## **Complaints Handling Procedure**

### **Stage One**

If an individual has a complaint against the charity for any reasons they should speak to director and the director should resolve it in well-respected manner.

### **Stage Two**

If the response given at Stage One does not satisfactorily resolve the complaint, the complaint can be put in writing to trustees by making clear what aspects of the response the complainant is not satisfied with. He/she should do this within 28 days of receipt of the Stage One response.

### **Stage Three**

Trustees should investigate the facts of the complaint or delegate a suitably senior person to do so.

Ideally complainants should receive a definitive reply at each stage within four weeks. If this is not possible because, for example, the investigation has not been completed, a progress report should be sent with an indication of when a full reply will be given. Whether the complaint is upheld or not, the reply to the complainant should describe the action taken as a result of the complaint.

### **The decision of the trustee is final.**

A written complaint should be addressed to Kafel Aid 162-164 High St. Birmingham B12 0LD. Alternatively, the complaint can be submitted through



our website: [www.kafelaid.org](http://www.kafelaid.org) or emailed direct to [director@kafelaid.org](mailto:director@kafelaid.org). Kafel Aid will send an acknowledgement within 10 business days from the receipt of a Stage Two complaint.

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# E-Safety Policy

## Roles and Responsibilities

e-Safety is a crucial aspect of our practices within the organisation, Therefore the chairperson and governing body have the highest responsibility to ensure that the policy and practices Hanadi Terro. All members, staff, volunteers and service users and/or potential service users and their parents, guardians, carers must be made aware of who holds this post. It is the duty of the e-Safety coordinator to be updated on current issues and guidance through organisations such as Child Exploitation and Online Protection Command (CEOP); they must use this knowledge to update staff, volunteers and governing bodies.

### Writing and Reviewing the E-Safety policy

Our e-Safety policy has been agreed by the trustee's board. The policy and its implementation are reviewed annually.

## E-Safety Skills Development for Staff and Volunteers

- Every member of staff and volunteer receive constant information and training on e-Safety issues through the e-safety coordinator at staff meetings and volunteers' training.
- New members of staff and volunteers should receive information on Kafel Aid's 'Acceptable Use Agreement' as part of their induction.
- Every member of staff must be made aware of individual duties relating to the safeguarding of children within the context of e-Safety and they must know what to do in the event of misuse of technology by any member of Kafel Aid's service users.
- Our e-safety coordinator should attend e-safety training courses at least once a year.

## Children and Young Persons

- Children and young persons must tell a member of staff or volunteer immediately if they receive explicit or offensive/harmful emails and/or content.
- They will be educated in the effective use of the Internet, including the skills of knowledge location, retrieval and evaluation, as well as what is acceptable and what is not; thus, they will be given clear objectives for Internet use.
- Children and young persons must not reveal their personal details or the personal details of others via email, or arrange to meet anyone without specific permission.

Children and young persons should be advised on online security and should be encouraged to set passwords, deny access to unknown individuals and be instructed how to block unwanted communications



- They will be advised on the possible consequences of placing personal photos on any social network space.
- They will be made aware of the dangers of meeting strangers from online communications and the importance of how to report concerns to a safe adult.

### **Social Networking**

- Kafel Aid should block and/or filter access to social networking sites and newsgroups unless a specific use is approved.
- The sending of abusive or inappropriate text messages, e-mails and content is prohibited
- The organisation will work with an ICT consultant to provide online support, taking reasonable steps to ensure adequate levels of security for the type of the service we provide, check apps, websites and tools prior to using them with children.
- This should include checking the results of searches, and being vigilant in advice; they will also guide us in ensuring that we avoid new threats to online security. This will ensure that filtering systems are as effective as possible.

## Managing Internet Access

### Information system security

- Kafel Aid's ICT system's capacity and security will be reviewed regularly
- The contact details published on the website should be Kafel Aid's address, email and telephone number.
- Staff or children/young persons' personal information will not be published.
- The safeguarding officer and the e-safety officer (or nominee) will take editorial responsibility and ensure that content is accurate and appropriate.

### Publishing Children's Images and Photographs

- Written permission from parents or carers will be required before photographs of children are published on Kafel Aid's website.
- Parents/carers may withdraw permission, in writing, at any time.
- Photographs including children will be selected carefully and will not enable any individual child to be clearly identified.
- Children and young persons names will not be used anywhere on the website or blog in association with photographs.



## Managing emerging technologies

- Emerging technologies will be examined for users' benefit and a risk assessment will be carried out before use is allowed.
- The use of portable media such as memory sticks and CD ROMS will be closely monitored to identify potential sources of computer viruses.
- Virus protection will be installed and updated regularly.
- Security strategies will be discussed with the ICT consultant.
- Protecting Personal Data; personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998.

## Assessing Risks

Kafel Aid will take reasonable precautions to prevent access to inappropriate material

- The organisation should audit ICT use to determine if the e-safety policy is adequate and ensure that the implementation of the policy is appropriate.

## Responding to E-Safety Incidents/Complaints

- Complaints of Internet misuse will be taken very seriously and will be dealt with by the governing body.
- Complaints of a child protection nature need be dealt with in accordance with our child protection procedures.
- Complaints regarding staff misuse will be referred to the chairperson
- Parents wanting to complain about e-safety issues should use the established Organisation Complaints Procedure.
- Children and parents will be informed of this complaints procedure.
- Meetings will be held with the Police Youth Crime Reduction Officer to establish procedures for handling potentially illegal issues.
- Complaints or concerns regarding our e-safety policy should be made to the e-safety officer coordinator and/or safeguarding lead officer.

## Inappropriate Materials

All users will be made aware of the procedures for reporting accidental access to inappropriate materials. The breach will be immediately reported to the e-safety coordinator or the Designated Safeguarding Officer.

- Deliberate access to inappropriate materials by any user will result in the incident being logged, in the first instance, and then forwarded to the e-safety co-ordinator.



- Depending on the seriousness of the offence, an investigation will be carried out by the governing body. Staff and volunteers are aware that negligent use or deliberate misconduct could lead to disciplinary action. In case of serious incident, it will be reported to the police.

## Parents, Carers and Guardians and the E-Safety Policy

- Parents/carers are required to make a decision as to whether they consent to their child joining online activities, thus allowing them access to the Internet.
- Parents are encouraged to look at Kafel Aid's e-safety policy, which is also available in Tigray, Tigrinya and Arabic.

## Communication of Policy

### Children and Young persons

- Rules for Internet access will be posted in all networked rooms.
- Children and young persons will be informed that Internet use will be monitored.

### Staff

- Every member of staff and volunteer will be informed about and given access to our eSafety Policy.
- They must be aware that Internet traffic can be monitored and traced to the individual user
- Discretion and professional conduct is vital.

### Parents

- Parents' attention will be drawn to Kafel Aid's e-Safety Policy throughout our induction days.
- Leaflets about this will be made available, and this information will also be found on our website in English, Tigray, Tigrinya and Arabic.

## E-Safety Rules

- Network access must be made via the user's authorised account and password, which must not be given to any other person.
- All Internet use must be appropriate to research. Copyright and intellectual property rights must be respected.



- Anonymous messages and the forwarding of chain letters are not permitted.
- Users must be careful not to reveal personal information via email, personal publishing, blogs or messaging.
- Kafel Aid's ICT systems may not be used for private purposes, unless an individual has been given specific permission.
- Use for personal financial gain, gambling, political activity, advertising or illegal purposes is not permitted.

## Staff and volunteers Information Systems Code of Conduct

- To ensure that staff and volunteers are made fully aware of their professional responsibilities when using information systems, they are asked to sign this code of conduct:

*Staff and volunteers should consult Kafel Aid's e-safety policy for further information and clarification.*

- *The information systems are organisation property; it is a criminal offence to use a computer for a purpose not permitted by its owner.*
- *I will ensure that my information systems use will always be compatible with my professional role.*
- *I understand that the organisation's information systems may not be used for private purposes, without specific permission from the nominated person.*
- *I understand that the organisation may monitor my information systems and Internet use to ensure policy compliance.*
- *I will respect the system security and I will not disclose any password or security information to anyone other than an appropriate system manager.*
- *I will not install any software or hardware without permission.*
- *I will ensure that personal data is kept secure and is used appropriately, whether in Kafel Aid's premises, taken off the organisation premises or accessed remotely.*
- *I will respect copyright and intellectual property rights.*
- *I will report any incidents of concern regarding children's safety to the e-Safety Coordinator or the Safeguarding officer.*
- *I will ensure that any electronic communications with the users are compatible with my professional role.*
- *I will promote e-safety with children and/or young persons in my care and will help them to develop a responsible attitude to system use and to the content they access or create.*



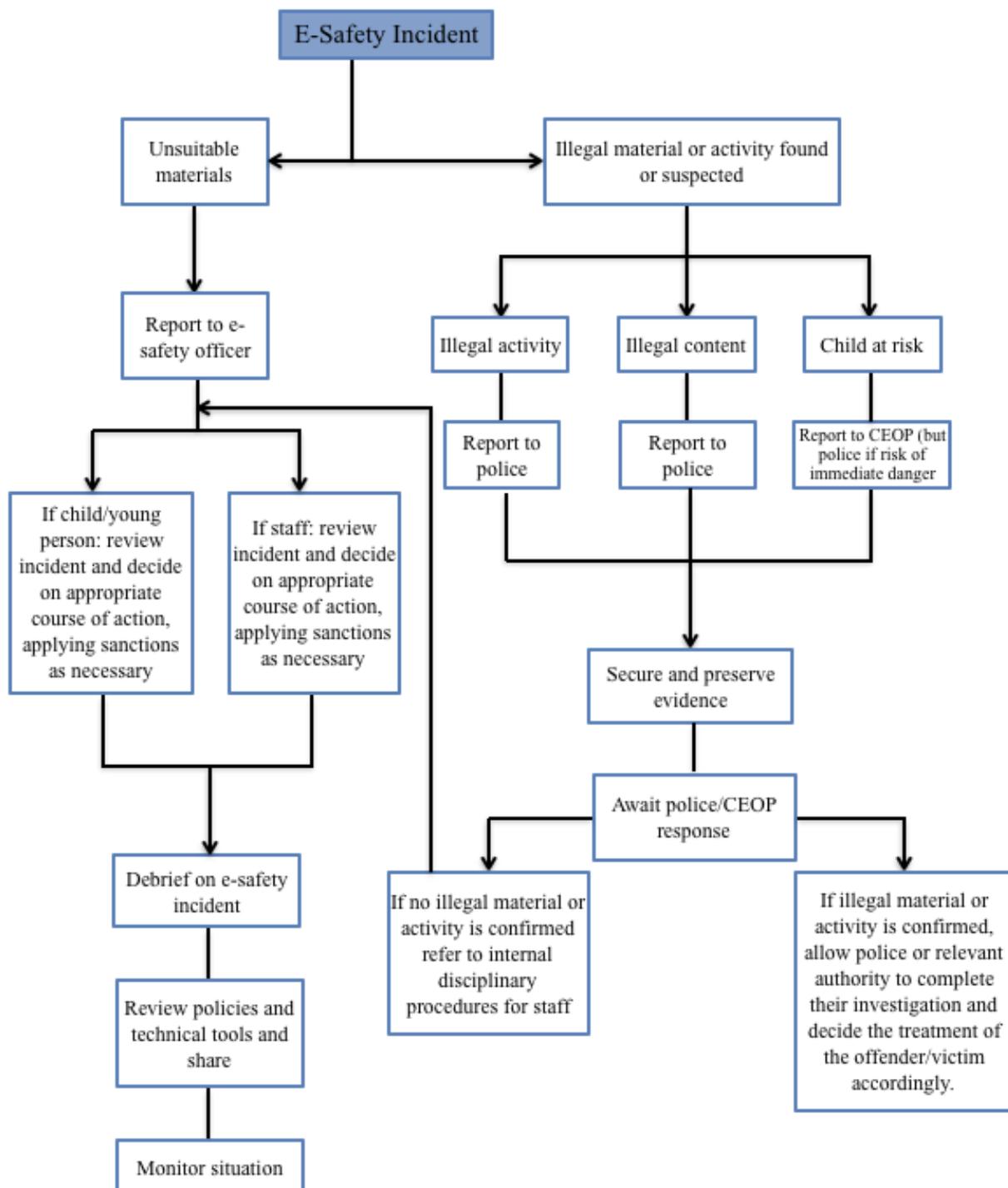
## Children and Young persons with additional needs

Staff and volunteers must be aware that some children and young persons may need additional teaching including reminders, prompts and further explanation to reinforce their existing knowledge and understanding of e-safety issues.

- Where a child and/or young person has poor social understanding, careful consideration will be given to group interactions when raising awareness of e-safety.
- Internet activities are planned and well-organised for children and young people.

## Monitoring and review

- This policy is implemented on a daily basis by our staff and volunteers, subcontractors and all the users of our services; it is monitored on an annual basis by the e-Safety Coordinator.
- This must also be revised, as required in line with new legislation, guidance or feedback from service users
- The approach may be updated to ensure that there is appropriate consultation with all relevant stakeholders, including children, young people and their families.
- This policy is the governing body's responsibility and they will review its effectiveness annually.
- They will do this during reviews conducted between the e-Safety Coordinator, Designated Safeguarding Officer Coordinator.
- Ongoing incidents will be reported to the full governing body.



### Change Record:

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18/04/2020	17/04/2022 or after a significant change in operations or a significant incident, whichever is sooner	Executive Director	The Trustees on 09/05/2020



# Child Safeguarding Policy & Procedure

## Introduction

Kafel Aid is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all children and young people involved in kafel Aid in accordance with the Care Act 2014.

Kafel Aid's safeguarding policy and procedures apply to all individuals involved in the organisation.

## 1. Purpose

**1.1** The purpose of a Child Safeguarding Policy and Procedure is to ensure that appropriate action is taken when a child and a young person, up to the age of 18 years, is suspected of either being abused or at risk from parents, guardians, carers, adult visitors, other responsible adults or other young people.

**1.2** Kafel Aid's Child Safeguarding Policy recognises that the safety and protection of children is paramount and has priority over all other interests. The purpose of this policy is to protect any children or young persons who receive our services. It also includes the children or child relatives of adults who may be receiving our services. Whilst delivering services to children may not form part of our core business, we recognise that everyone working with children has a responsibility for keeping them safe and we have a statutory duty to ensure robust procedures are in place.

**1.3** This policy refers to all children up to 18 years of age (including the unborn) regardless of nationality, culture or religion). The term 'children' will be used throughout this policy to refer to children and young persons.

## 2. Principles

The guidance given in the policy and procedures is based on the following principles:

- All children regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- The rights, dignity and worth of all children and young persons will always be respected.
- We recognise that ability and disability can change over time, such that some children may be additionally vulnerable to abuse, in particular those with care and support needs



- We all have a shared responsibility to ensure the safety and well-being of all children and young persons and will act appropriately and report concerns.
- All allegations will be taken seriously and responded to quickly in line with Kafel Aid Safeguarding Policy and Procedures.

## The six principles of safeguarding

The Care Act 2014 sets out the following principles that should underpin our safeguarding policy:

- **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.  
  
“I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens.”
- **Prevention** – It is better to take action before harm occurs.  
  
“I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help.”
- **Proportionality** – The least intrusive response appropriate to the risk presented.  
  
“I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed.”
- **Protection** – Support and representation for those in greatest need.  
  
“I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse  
  
“I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”
- **Accountability** – Accountability and transparency in delivering safeguarding.  
  
“I understand the role of everyone involved in my life and so do they.”

## 3. Legislation

The practices and procedures within this policy are based on the principles contained within the UK legislation and Government Guidance and have been developed. They take the following into consideration:



- The Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- The Equality Act 2010
- The Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- The Human Rights Act 1998
- The Data Protection Act 1998

## 4. Scope

**4.1** The following roles may be affected by this policy:

- All staff
- Volunteers
- Anyone working on behalf of our organisation
- Senior Management including Directors
- Students, Trainees, Apprentices, Work Experience
- Contractors
- Agency Staff

**4.2** The following people may be affected by this policy:

- Service Users
- Children

**4.3** The following stakeholders may be affected by this policy:

- Family
- Commissioners
- External health professionals
- Local Authority
- NHS

It's essential that everyone who works with d/Deaf and disabled children understands how to protect them against people who would take advantage of their increased vulnerability.

## 5. Objectives

**5.1** The objective of Kafel Aid is to have a coordinated approach to child protection and to ensure that Kafel Aid procedures dovetail with policies and procedures published by the National and Local Safeguarding authorities.



5.2 To ensure that the voice of the child is heard and that a child-centred approach is taken.

## 6. Definitions

To assist working through and understanding this policy a number of key definitions need to be explained:

### Children or young person

- Under the Children Acts 1989 and 2004 respectively, a child (or young person) is anyone who has not yet reached their 18th birthday. The fact that a child has reached sixteen years of age, lives independently or is in further education, is a member of the armed forces, is in hospital, in prison or in a Young Offenders Institution does not change his or her status or entitlement to services or protection under the Children Act 1989

**Child safeguarding** is protecting a child's right to live in safety, free from abuse and neglect.

### 6.1 Staff

- Employment context: A person working under the control or direction of another, under a contract of employment in return for a wage or salary

**6.2 Volunteer** • The Disclosure and Barring Service (DBS) defines a 'volunteer' as: "A person who is engaged in any activity which involves spending time, unpaid (except for travelling and other approved out of pocket expenses), doing something which aims to benefit someone (individuals or groups) other than, or in addition to close relatives

**Staff and volunteer awareness:** it is important that the staff are aware of the policies as a part of their training. Briefings will be carried out regularly to update members of staff on any changes made to the policy.

### 6.3 Safeguarding

- Safeguarding is a term which is broader than 'child protection' and relates to the action taken to promote the welfare of children and protect them from harm. Safeguarding is everyone's responsibility. Statutory guidance says that safeguarding means:
  - Protecting children from maltreatment
  - Preventing impairment of children's health or development
  - Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
  - Taking action to enable all children to have the best outcomes



#### **6.4 Controlling behaviour**

- Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

#### **6.5 Coercive behaviour**

- Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This definition, which is not a legal definition, includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group

#### **6.6 Child Sexual Exploitation**

- Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology

#### **6.5 Safeguarding Partners**

- Local Safeguarding Children Boards (LSCBs) are being replaced by “Safeguarding Partners.” Under the new legislation, three safeguarding partners (Local Authorities, Chief Officers of Police, and Clinical Commissioning Groups) must make arrangements to work together with relevant agencies (as they consider appropriate) to safeguard and protect the welfare of children in the area

#### **6.6 Contextual Safeguarding**

- Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extrafamilial abuse can undermine parent-child relationships

#### **6.7 GDPR**

- The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union (EU)



- The GDPR forms part of the data protection regime in the UK, together with the new Data Protection Act 2018 (DPA 2018). The main provisions of this applied like the GDPR, from 25 May 2018

## 6.8 Abuse

- Abuse is a violation of child's human and civil rights by another person or persons.

## 6.9 Child abuse

- Child abuse are children who may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their daily lives.

Abuse can take a variety of different forms, including:

## 6.10 Types of Abuse and Neglect

There are different types and patterns of abuse and neglect, and different circumstances in which they may take place. The Care Act 2014 identifies the following as an illustrative guide and is not intended to be exhaustive list as to the sort of behaviour which could give rise to a safeguarding concern:

**Self-neglect** – this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

**Modern Slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Domestic Abuse and coercive control** – including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence. It can occur between any family members.

**Discriminatory Abuse** – discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act.

**Organisational Abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Physical Abuse** – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

**Sexual Abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the child, young person or h as not consented or was pressured into consenting.



**Financial Abuse** – including theft, fraud, internet scamming, coercion in relation to an child, young persons.

**Neglect** – including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

**Emotional or Psychological Abuse** – this includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

**Not included in the Care Act 2014 but also relevant:**

**Cyber Bullying** – cyber bullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

**Forced Marriage and Honour Based Abuse/Violence** – forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry. The forced marriage of children occurs when they do not have the capacity to consent to the marriage.

Forced marriages of children must be regarded as a child protection issue. Kafel Aid should not contact the parents in this situation and should make a referral direct to the Safeguarding Team and follow local reporting procedures.

**Female Genital Mutilation (FGM)** – Staff/volunteers has a responsibility to report concerns if a Service User who has had FGM or of any female children who are at risk of FGM, they must discuss this with the Safeguarding team.

**Mate Crime** – a ‘mate crime’ as defined by the Safety Net Project as ‘when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.’ Mate Crime is carried out by someone the victim knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.



**Radicalisation** – the aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

## 7. Policy

### 7.1 Statement of Intent

Kafel Aid recognises the vulnerability of children and believes that it is always unacceptable for a child or young person to experience abuse of any kind. It fully supports the principle that the welfare of the child is paramount and accepts the United Nations Declaration of the Rights of the Child. Kafel Aid understands that children can be under threat, and/or abused by parents/family, other children and young people, carers, staff and others and that everyone who works with children has a responsibility for keeping them safe. Kafel Aid will ensure that it works in partnership with other agencies, children and their families so that children and families receive the right help, at the right time and with everyone who comes into contact with them, understanding that they all have a role to play in identifying concerns, sharing information and taking prompt action. Additionally, Kafel Aid believes that all children, regardless of ethnicity, gender, culture, sexual orientation, disability, faith or religious belief, have a right to equal protection from all types of harm or abuse.

**7.2** Kafel Aid recognises that deaf and disabled children and those with complex health needs are at increased risk of abuse. Furthermore, it understands that some children have increased vulnerability because of the impact of previous experiences, their level of dependency, their communication needs, or other issues and that threats can take a variety of different forms including sexual, physical and emotional abuse, neglect, exploitation by criminal gangs and organised crime groups, trafficking, online abuse, sexual exploitation and the influences of extremism leading to radicalisation. All necessary steps will be taken to ensure that the rights of all children are respected and that opportunities for abuse to occur are minimised in accordance with our disability policy.

**7.3** Kafel Aid will seek to keep children and young people safe by:

- Empowering children, listening, respecting and responding in a compassionate but effective way
- Ensuring a child-centred approach to service planning and delivery and keeping the child in focus when making decisions about their lives
- Ensuring that all staff read and understand this policy
- Providing child protection training to staff to enable them to recognise signs of abuse and follow appropriate procedures when dealing with child protection concerns • Adopting safe staff recruitment, selection and vetting procedures
- Sharing information about child protection and good practice with staff, volunteers, parents, carers and relevant agencies
- Requiring all staff to follow the reporting and recording procedures in every case of suspected abuse or disclosed abuse
- Ensuring that all staff with responsibility for, or contact with children, will be provided with appropriate policies, guidance, training and support to enable them to implement this policy



- Providing effective management and support systems for all staff so that staff know who to contact within Kafel Aid in the event of child protection concerns arising
  - Working within the relevant Local Safeguarding Partners' guidance and procedures
  - Ensuring policy and practice remains current and up to date and dovetails with local procedures
- People affected by this service should be aware of the following:
- You have a right to equal protection from all types of harm or abuse

#### **7.4 Information Sharing and Confidentiality**

Good communication is essential for any organisation. In Kafel Aid, every effort will be made to assure that any concerns that individuals have will be listened to and taken seriously.

It is the responsibility of the management staff to ensure that information is available to, and is exchanged between, all those involved in this organisation and its activities.

Children have a right to information, especially information that could make their life better and safer. Kafel Aid will act to ensure that they have information about how, and with whom, they can share their concerns, complaints and anxieties.

When sharing information, staff will be sensitive to the level of understanding and maturity, as well as to the level of responsibility of the people with whom they are sharing.

We understand that some information is confidential and should only be shared on a strictly need-to-know basis. Kafel Aid will ensure that staff follow the guidelines: [Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) (July 2018).

Kafel Aid will ensure that staffs understand that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

#### **7.5 Safe Recruitment**

Kafel Aid will take on a consistent and rigorous process of safe recruitment in order to ensure that those recruited are well qualified. This includes ensuring that safe recruitment and selection procedures are adopted which deter, reject or identify people who might abuse children or are otherwise unsuitable to work with them. Kafel Aid will not sub-contract to any organisation which has not been part of a safe recruitment process.

Kafel Aid will ensure that the level of DBS check required for the role will be confirmed. The recruiting manager will ensure that clearance is obtained before the applicant begins employment. As an employer of staff in a 'regulated activity', Kafel Aid has a responsibility to refer concerns to the Disclosure and Barring Service in accordance with the Safeguarding Vulnerable Groups Act 2006. Concerns must be reported by the managers to the local District Council Child Protection Team.



## **7.6 Best Practice**

Kafel Aid will adhere to HM Government's 'Working Together to Safeguard Children (2018)' and will follow, within the scope of its role and responsibilities, NICE guidance NG76 and CG89 in addition to other best practice documents cited in this policy and procedure.

## **7.7 Accountabilities and Responsibilities**

Individual staff has a responsibility to report and record any concerns, not to make decisions as to whether abuse has or has not occurred. An investigation into child abuse can only be undertaken by the Designated Safeguarding team. Doing nothing is not an option. If we know or suspect that a child is being abused, we will do something about it and ensure that our work is properly recorded.

### **7.7.1 The Leadership Team at Kafel Aid will:**

- Be responsible for the effectiveness of this policy and related procedures and for ensuring that sufficient resources are available to support its implementation
- Appoint a nominated Individual to ensure that this policy is agreed, implemented and reviewed within the governance framework
- Delegate responsibility for ensuring that this policy is integrated into the governance structure of Kafel Aid and reviewed
- Appoint a designated Safeguarding Officer(s) to undertake a lead role for safeguarding, including being involved in Serious Case Reviews with Local Safeguarding Partners and agreeing action plans for shortfalls or improvements in process, working with the local operational team
- The Safeguarding Lead will review concerns identified, standardise process and learning and report to the committee responsible for reviewing safeguarding incidents, ensuring that the trustees are informed

### **7.7.2 The director will:**

- Notify the designated Safeguarding Officer, if it is someone other than themselves, of any safeguarding concerns
- Notify the designated Safeguarding Officers of the outcome of any safeguarding meetings not attended by the Lead
- Ensure that they remain up to date on child protection processes in their own locality • Contact DBS in line with statutory reporting requirements

### **7.7.3 All managers are responsible for:**

- Ensuring that all staff/volunteers are aware of their responsibilities in accordance with this policy and associated documents
- Monitoring compliance with this policy within their area of responsibility
- Providing support to staff/volunteers involved in any children welfare incidents
- Ensuring that staff/volunteers complete approved safeguarding training



- Ensuring that the services provided are compliant with Kafel Aid safeguarding and child protection processes as well as the local Safeguarding Partners processes • Notifying the Designated Safeguarding Officer of any safeguarding concerns
- Notifying the Designated Safeguarding Officer of the outcome of any safeguarding meetings not attended by the Designated Safeguarding Officer

## 7.8 Safeguarding Disabled Children

Disabled children are at high risk of abuse, and that the presence of multiple disabilities appears to increase the risk of both abuse and neglect. A child could be considered to be disabled if he or she has significant problems with communication, comprehension, vision, hearing or physical functioning. A failure to recognise disabled children's human rights can lead to abusive situations.

Kafel Aid will

- Ensure that its services will readily seek the views of children, parents and other professionals in reviewing their practice.
- Pay particular attention to promoting a high level of awareness of the risks of harm, to high standards of practice, and to strengthening the ability of children and families to help themselves.
- Enable disabled children to make their wishes and feelings known with respect of their care and treatment.
- Make sure that all disabled children know how to raise concerns and give them access to a range of adults with whom they can communicate. This could mean using interpreters and facilitators who are skilled in using the child's preferred method of communication
- Ensure that there is an explicit commitment to and an understanding of disabled children's safety and welfare among all staff, volunteers and service users.
- Develop the safe support services that families want, and a culture of openness and joint working with parents and carers on the part of services

## 8. Procedure

### 8.1 Recognising Children who May Need Early Help

Kafel Aid should ensure that staff understand that they should be alert to the potential need for early help as stated in 'Working Together to Safeguard Children' (2018) for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer



- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups • Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
  
- Is a privately fostered child

Additionally, staff/volunteers should be aware of any new or emerging threats which include online abuse, grooming, sexual exploitation and radicalisation as well as having the ability to identify symptoms and triggers of abuse or neglect.

## **8.2 Local Procedures**

All members of staff, including contracted or agency staff working with children, will familiarise themselves with the local child safeguarding procedures, guidelines and policies and work within them. Kafel Aid will ensure that all staff within Kafel Aid are aware and understand their local child protection policies and their localised reporting procedures for the local District Council. Kafel Aid should identify a member of staff responsible for safeguarding.

## **8.3 Responding When a Child Discloses Abuse**

Keep the following considerations in mind when talking to a child who is disclosing abuse:

- Help the child feel comfortable
- Reassure the child that it is not their fault. Let them know that they have not done anything wrong
- Do not react with shock, anger, disgust. Be calm
- Do not force a child to talk. Give the child time. Let him/her talk to you at their own pace
- Do not force a child to show injuries
- Use terms and language that the child can understand
- Do not 'interview' the child
- Ask appropriate questions
- Do not ask 'why' questions
- Do not teach the child new terms or words. This is important in relation to the court and law
- Find out what the child wants from you
- Be honest with the child
- Confirm the child's feelings. Be supportive



- Remember that the safety of the child is most important. Keep in mind that a child might be further abused if they report that they have spoken to someone about the abuse. If you feel that the child is in danger, you must act immediately

#### **8.4 Reporting Concerns**

- If the child requires immediate medical attention call an ambulance and inform the control room staff that there is a child protection concern
- Call 999 if in immediate danger
- Report incident/concerns to the relevant line manager who will support you to complete a report form
- Report to the local safeguarding partners

#### **8.5 Raising concerns**

- If at any point a member of staff/volunteers have concerns about the safety and or wellbeing of a young person they should raise these with the Designated Safeguarding Officer to ensure that a risk assessment can be discussed and any mitigation pulled together to ensure people are kept safe.
- Staff/volunteers and members should also feel comfortable and confident to raise any concerns with the local Safeguarding authorities.

#### **8.6 Whistleblowing**

It is important to remember that safeguarding is everyone's responsibility, and a culture should be promoted where staff are able to raise concerns and whistleblow without fear

#### **8.7 What to do if you have a concern, or if someone raises concerns with you.**

- It is not your responsibility to decide whether or not a child, young person has been abused. It is, however, everyone's responsibility to respond to and report concerns.
- Always place the child or young person's welfare and interests as the paramount consideration.



- Make safeguarding personal using a person-led and outcomes-focused approach. Staff must talk with the child, young person at risk about how best to respond to their safeguarding situation in a way that enhances their involvement, control and choice throughout the safeguarding process.
- Listen carefully and actively to the person.
- If you are concerned someone is in immediate danger, contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.
- If you have concerns and or you are told about possible or alleged abuse, poor practice or wider welfare issues you must report this to the Euro Arab Foundation H S.
- It is important when considering your concern that you keep the person informed about any decisions and action taken, and always consider their needs and wishes.

## 8.8 How to respond to a concern

- If an employee/volunteer believes a child or young person to be at immediate risk of harm or abuse, and/or a criminal offence is taking place, they must take immediate steps to protect that person by calling 999.
- Employees must then contact the Safeguarding Officer to let them know what has happened and to take advice on next steps.
- Make a note of your concerns.
- Make a note of what the person has said using his or her own words as soon as practicable. Complete an Incident Form and submit to Kafel Aid Designated Safeguarding Officer.
- Describe the circumstances in which the disclosure came about.
- Take care to distinguish between fact, observation, allegation and opinion. It is important that the information you have is accurate.
- Be mindful of the need to be confidential at all times. This information must only be shared with the Designated Safeguarding or Safeguarding Officer and others on a need-to-know basis.
- If the matter is urgent and relates to the immediate safety of a child or a young person at risk then contact the emergency services immediately.

## 8.9 Procedures

What to do if you have concerns about a child

You may have concerns about a child because of something you have seen or heard, or a child may choose to disclose something to you. If a child discloses information to you, you should:

- Do not promise confidentiality, you have a duty to share this information and refer to Children's Social Care Services.
- Listen to what is being said, without displaying shock or disbelief.



- Accept what is said.
- Reassure the child, but only as far as is honest, don't make promises you may not be able to keep *eg: 'Everything will be alright now', 'You'll never have to see that person again'.*
- Do reassure and alleviate guilt, if the child refers to it. For example, you could say, *'You're not to blame'.*
- Do not interrogate the child; it is not your responsibility to investigate.
- Do not ask leading questions (*eg: Did he touch your private parts?*), ask open questions such as *'Anything else to tell me?'*
- Do not ask the child to repeat the information for another member of staff.
- Explain what you have to do next and who you have to talk to.
- Take notes if possible or write up your conversation as soon as possible afterwards.
- Record the date, time, place any non-verbal behaviour and the words used by the child (do not paraphrase). • Record statements and observable things rather than interpretations or assumptions.
- Whatever the nature of your concerns, discuss them with your manager or a designated member of staff. See the diagram below for the process to follow.

### **8.10 Management of Allegations Against People in Positions of Trust**

When working with children and families, Kafel Aids s have clear policies for dealing with allegations against people working with children. Kafel Aid will make a clear distinction between an allegation, a concern about the quality of care or practice or a complaint. An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

If an allegation arises it should:

- Be reported immediately to the Designated Safeguarding Officer within Kafel Aid, provided that the allegations have not been made against him/her.
- In these cases, the Child Protection Officer will hold discussions to determine the outcome of this, depending on whether or not there is enough evidence to support the allegations. Allegations that appear to be less serious must still be assessed by someone independent of the organisation.
- Be addressed as quickly as possible with a consistent and a fair and thorough investigation. Where it appears that a criminal offence may have been committed, the Police should be contacted immediately by the appropriate Senior Manager
- The District Council's Children's Social Care Team must be informed within one working day of all allegations that come to the attention of Kafel Aid or that are made to the Police regarding an employee or someone in a position of trust working with, or on behalf of, or who is known to



Kafel Aid who may have caused harm to a child. It is the responsibility of the trustees to ensure that the local Council Children's Social Care Team is notified

### *8.11 Allegations Involving a Members of Staff / Volunteer*

Kafel Aid is committed to having effective recruitment and human resources procedures, including checking all staff and volunteers to make sure they are safe to work with children and young people. Where appropriate, key staff involved in recruitment processes will undertake Safer Recruitment Training.

However, there may still be occasions when there is an allegation against a member of staff or volunteer. Allegations against those who work with children, whether in a paid or unpaid capacity, cover a wide range of circumstances

All allegations of abuse of children by those who work with children or care for them must be taken seriously. All reports of allegations must be submitted within one working day to The Child Protection Officer.

The following procedure should be applied in all situations where it is alleged that a person who works with children has:

- Behaved in a way which has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates that he/she is unsuitable to work with children.

The allegations may relate to personal behaviour at work, at home or in another setting.

The Designated Safeguarding Officer will discuss- Unless he/she is the one who the allegation is made against- the matter to determine what steps should be taken and where necessary obtain further details of the allegation and the circumstances in which it was made. The discussion should also consider whether there is evidence/information that establishes that the allegation is false or unfounded, whether a referral to the Local Safeguarding Partners is required and/or whether disciplinary action is appropriate.

Some allegations will be so serious as to require immediate referral to the Police and the Local Safeguarding Partners, but common sense and judgement must be applied in deciding on what action to take.

If the allegation is not patently false and there is cause to suspect that a child is suffering or is likely to suffer Significant Harm, the Child Protection Officer will immediately refer the matter to the Local Social service the Supporting Families Division and ask for a Strategy Discussion/Meeting to be convened straight away.

Some allegations may be less serious and at first sight might not seem to warrant consideration of a police investigation or the local Safeguarding Partners. However, it is important to ensure that even apparently less serious allegations are followed up and examined objectively by someone independent of the organisation. Consequently, the Designated Safeguarding Officer should be informed of all allegations that come to the employer's/volunteer's attention and appear to come within the scope of this procedure so that he or she can consult Police and social care colleagues as appropriate. Where such allegations are made, consideration must be given to the following three strands:

- The police investigation of a possible criminal offence;



- Enquiries and assessment by Children's Social Care Services as to whether the child is in need of protection or services;
- Consideration by an employer of disciplinary action in respect of the individual.

### 8.12 Referral to DBS

If Kafel Aid removes an individual (paid worker or unpaid volunteer) from work in regulated activity with children (or would have, had the person not left first) because the person poses a risk of harm to children, it must make a referral to the Disclosure and Barring Service to consider whether to add the individual to the barred list. Where an individual is a registered practitioner such as a Registered Nurse, they should also be referred to their Registered Body, such as the Nursing and Midwifery Council, irrespective of whether they were working as a registered practitioner for Kafel Aid.

## 9. Consent and Information Sharing

Workers and volunteers within the Organisations should always share safeguarding concerns in line with the Organisation's policy, usually with their safeguarding lead or welfare officer in the first instance, except in emergency situations. As long as it does not increase the risk to the individual, the worker or volunteer should explain to them that it is their duty to share their concern with their safeguarding lead or welfare officer.

The safeguarding lead or officers will then consider the situation and plan the actions that need to be taken, in conjunction with the child, young person or adult at risk and in line with the organisation's policy and procedures and local safeguarding adults board policy and procedures.

Individuals may not give their consent to the sharing of safeguarding information with the safeguarding adult for a number of reasons. Reassurance, appropriate support and revisiting the issues at another time may help to change their view on whether it is best to share information.

If they still do not consent, then their wishes should usually be respected. However, there are circumstances where information can be shared without consent such as when the adult does not have the capacity to consent, it is in the public interest because it may affect other people or a serious crime has been committed. This should always be discussed with your safeguarding lead.

If someone does not want you to share information outside of the organisation or you do not have consent to share the information, ask yourself the following questions:

- Is the child, young person or adult placing themselves at further risk of harm?
- Is someone else likely to get hurt?
- Has a criminal offence occurred? This includes theft or burglary of items, physical abuse, sexual abuse, forced to give extra money for lessons (financial abuse) or harassment.



- Is there suspicion that a crime has occurred?

If the answer to any of the questions above is 'yes' - then you can share without consent and need to share the information.

When sharing information there are seven Golden Rules that should always be followed.

1. Seek advice if in any doubt
2. Be transparent - The Data Protection Act (DPA) is not a barrier to sharing information but to ensure that personal information is shared appropriately; except in circumstances whereby doing so places the person at significant risk of harm.
3. Consider the public interest - Base all decisions to share information on the safety and well-being of that person or others that may be affected by their actions.
4. Share with consent where appropriate - Where possible, respond to the wishes of those who do not consent to share confidential information. You may still share information without consent, if this is in the public interest.
5. Keep a record - Record your decision and reasons to share or not share information.
6. Accurate, necessary, proportionate, relevant and secure - Ensure all information shared is accurate, up-to-date and necessary, and share with only those who need to have it.
7. Remember the purpose of the Data Protection Act (DPA) is to ensure personal information is shared appropriately, except in circumstances whereby doing so may place the person or others at significant harm.

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 introduce new elements to data protection management, superseding the Data Protection Act 1998. It places a greater significance on organisations being transparent and accountable in relation to their use of data. All organisations handling personal data need to have comprehensive and proportionate arrangements for collecting, storing, and sharing information.

Where Kafel Aid needs to share special category personal data, Kafel Aid should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that permits sharing information without consent.

Information can be shared legally without consent if Kafel Aid is unable to or cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk

Kafel Aid should ensure that staff working with children and young people have read and understand the 'Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)' and understand that GDPR should not be a barrier to sharing information. Kafel Aid should ensure that staff follow the 7 Golden Rules for information sharing.

1. Staff/Volunteers should be open and honest with the children/ young persons (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
2. Seek advice from the safeguarding team, the governance body if in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.



3. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. As under the GDPR and Data Protection Act 2018, you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. Base your judgement on the facts of the case and be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared
4. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the child/young person and others who may be affected by their actions.
5. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (e.g. secure e-mails, password protect and see full document for more examples).
6. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## 10. Referral

As in all cases, concerns that a child in danger of sexual exploitation should be discussed with the designated safeguarding officer, and a decision made as to whether there should be a referral to Children's Social Care.

The wishes and feelings of the child or young person should be obtained when deciding how to proceed, but Staff /volunteers should be aware that perpetrators may have groomed the child's responses and that the child may be denying what is happening.

Where a member of staff is fearful of losing the engagement of a child or young person by reporting their concern to Children's Social Care, the Designated Safeguarding officer should discuss this with Children's Social Care to agree a way forward. Any decision not to share information or refer a child should be recorded with a full explanation of the rationale behind that decision and the prevailing circumstances at that time.

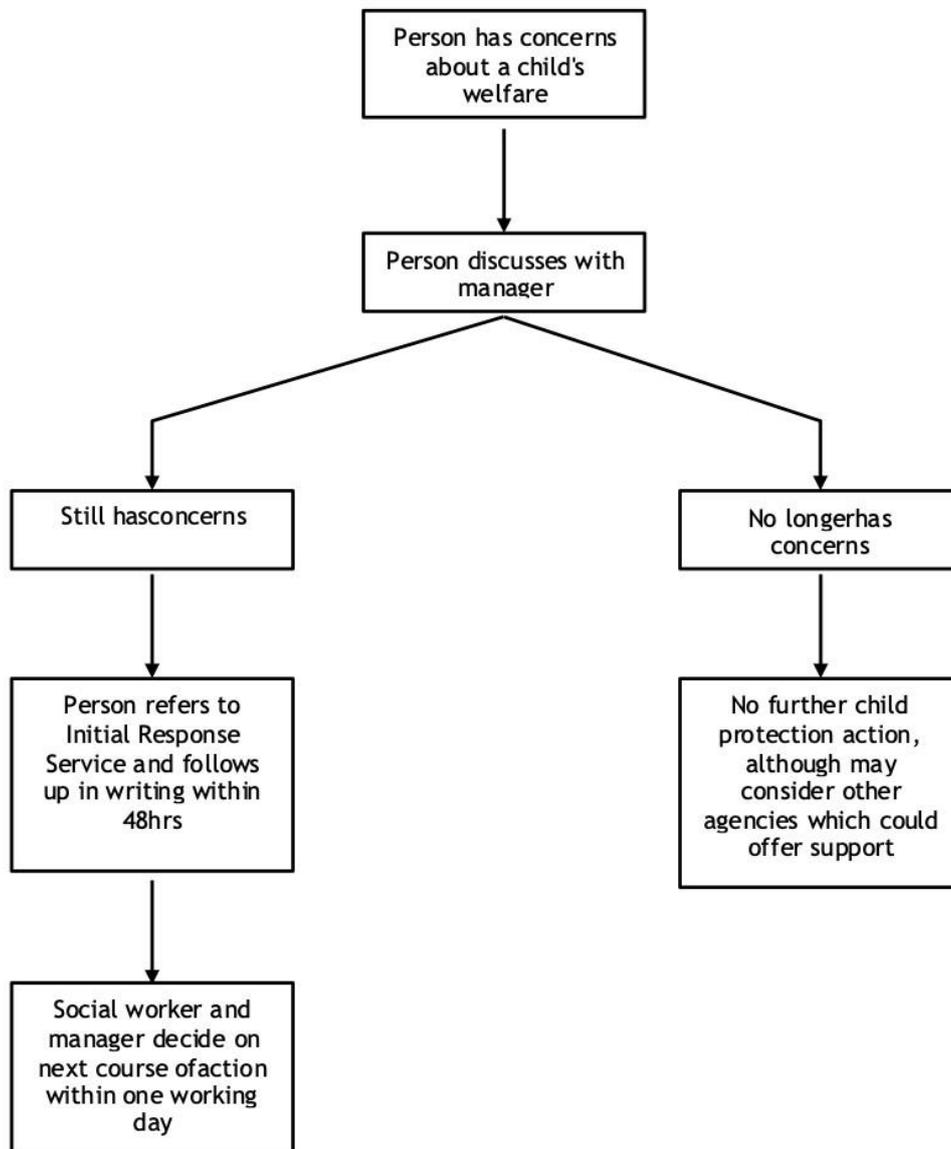
A child or young person who is suspected of suffering or being at risk of suffering sexual exploitation will be a child who may be a Child in Need under the Children Act 1989 and should be referred to Children's Social Care using the relevant local child protection referral procedures.

The Local Safeguarding Partnership will consult and share information concerning incidents or suspicions of sexual exploitation within 24 hours. A decision should be made whether a criminal offence has been committed against a child or young person.

The child's needs and circumstances should be carefully assessed, including issues of ethnicity, gender, culture, disability, religion and sexual orientation.



## Process Chart Where There Are Concerns About A Child's Welfare





## 11. Training

Safeguarding Children and Young People should be included within mandatory induction and include familiarisation with child protection responsibilities and the procedures to be followed should anyone have any concerns about a child's safety or welfare.

## 12. Reviewing the policy and procedure

Reviewing the policy and procedure is essential and will happen annually by the means of checking telephone numbers, details of personnel, and reviewing changes made in local or national policy.

### KAFEL AID - DBS Disclosures (Check)

No	Surname	Forename	Dept.	DBS ID Number	Certificate Number	Date of Issue
1	Terro	Hanadi	Volunteer	P0001YOASRW	000948835312	15/10/2019
2	Nawaf	Hasna	Volunteer		001532321603	06/06/2016
3	Saleh	Abdulhakim	Management		001553333898	18/11/2016
4	Said Ibrahim	Asia	Volunteer		001589167809	27/09/2017

#### Name of the Designated Safeguarding Officer:

Asia Said Ibrahim  
077 66 507 457

Abdulhakim Saleh  
078 522 34763  
director@kafelaid.org

## Change Record

Date of Change:	Changed By:	Comments:
18/04/2020	Director	Policy approved by the Trustees



# COUNTER-TERRORISM AND ANTI MONEY LAUNDERING POLICY

## 1. Policy Statement

**1.1** KAFEL AID and its staff are committed to the highest standards of anti-money laundering (AML), including anti-fraud, anti-corruption and taking measures to mitigate against financial crime. We abide by and adheres to all applicable laws and regulations regarding AML in all jurisdictions where it conducts its activities. We have developed and implemented a comprehensive set of measures to identify, manage and control all AML risks. We understand that the money laundering regulations and legislation place a responsibility upon KAFEL AID employees to combat money laundering with regard to a wide area of financial transactions, including possessing, or in any way dealing with, or concealing, the proceeds of any crime.

## 2. Purpose

**2.1** This purpose of this policy is to ensure that KAFEL AID complies with the obligations and requirements set out by UK legislation, regulations and rules regarding AML. This includes ensuring that we have adequate systems and controls in place to mitigate against any risk posed to the organisation and its Donors. This policy is also in place to ensure that all employees know and understand their obligations with regards to our anti-money laundering measures and the consequences of non-compliance in this area. KAFEL AID will do everything possible to protect its staff and Donors from being exposed to money laundering and will comply with the guidance and rules laid out in Money Laundering Regulations 2007, The Proceeds of Crime Act 2002 and the Terrorism Act 2000. Any actual or suspected acts of money laundering will be reported to the NCA and where applicable to regulatory requirements, an MLRO will be appointed to oversee all aspects of the anti-money laundering functions.

## 3. Scope

**3.1** The policy relates to all staff (meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with KAFEL AID in the UK or overseas) within the organisation and has been created to ensure that staff deal with the area that this policy relates to in accordance with legal, regulatory, contractual and business expectations and requirements. Failure of any staff member to adhere to the guidance and objectives laid out in this policy, may lead to disciplinary action.

## 4. What Is Money Laundering



**4.1** Money laundering is the term used to describe the process or act of disguising or hiding the original ownership of money that has been obtained through criminal acts such as terrorism, corruption, or fraud. Such monies are then moved through legitimate businesses and sources to make it appear 'clean'.

**4.2** KAFEL AID operates under and complies with the below laws, Acts and regulations with regards to our Anti-Money Laundering policy and procedures:

- The Proceeds of Crime Act 2002 (POCA)
- Serious Organised Crime and Police Act 2005 (SOCPA)
- The Terrorism Act 2000, as amended by the:
- The Anti-Terrorism, Crime & Security Act 2001
- Terrorism Act (Amendment) Regulations 2007
- The Terrorism Act 2006
- The Bribery Act 2010
- The Money Laundering Regulations 2007
- The FCA Handbook
- The Joint Money Laundering Steering Group (JMLSG)

## 5. Objectives

**5.1** To prevent financial crime and money laundering within our organisation, KAFEL AID aims to meet the below objectives:

- The reporting and detection of suspected money laundering to the NCA via a SAR
- All staff are trained and must remain vigilant for the signs of money laundering
- No payment of cash will be accepted by the organisation if it exceeds £2000.
- Due diligence and Donor identification procedures will be followed by all staff and at all times
- Frequent risk assessment and audits of all AML and terrorist financing controls and systems
- To appoint a Money Laundering Reporting Officer with sufficient knowledge and seniority as to complete the tasks and objectives laid out in this document
- Maintain Donor identification procedures in all circumstances
- Implement procedures to enable the reporting of suspicions of money laundering
- Maintain record keeping procedures
- Utilise an employee screening program to ensure due diligence

**5.2 Anti-Bribery & Anti-Corruption:** KAFEL AID operates a zero-tolerance policy with regards to bribery and corruption, we have a structured Anti-Bribery & Corruption Policy in place with our intent and objectives in this area and also realise that impact that bribery and corruption have on the money laundering requirements. As bribery and corruption are often associated with organised crime and/or money laundering, we are committed to applying high standards of honesty and integrity throughout our organisation and ensure that all staff operate in accordance with the intent.



## 6. Procedures

**6.1** KAFEL AID adheres to and complies with the principles of the Know Your Partner policy which aims to prevent financial crime and money laundering through Donor identification and due diligence. All partners/donors who are new to the organisation will undergo procedural due diligence checks prior to opening an account, as laid out below:

**6.2** Identification: Proof of who an individual or business is will be gained and recorded on a New Partner Application. 2 forms of ID are required with the person/business name on and 1 form of ID with the trading/home address. Acceptable forms of ID can include:

- Individual – Drivers Licence, Passport, Bank Statement, Utility Bill
- Business – Director/Proprietor ID, Certificate of Incorporation, Organisation Registration Number & Registered Office, Utility Bill, Supplier Invoice, Bank Statement

**6.3 Due Diligence Checks:** For businesses, credit and organisation background checks will be performed prior to account acceptance, details of which will be kept on file as evidence of due diligence and anti-money laundering checks. Due diligence checks are obligatory in the UK when a single transaction exceeds £15,000 or where doubt exists about the identity or reliability of the partner.

**6.4 Monitoring & Auditing Due Diligence:** At KAFEL AID the Compliance Officer is responsible for ensuring that due diligence checks, and anti-money laundering measures are being completed and are fit for purpose. Regular monthly audits are completed on due diligence forms, organisation checks and partner ID to ensure that staff are carrying out the due diligence and AML processes in accordance with this policy and legal requirements.

## 7. Measures to Prevent Money Laundering

There are certain measures and controls that can be implemented and carried out to help prevent against money laundering. KAFEL AID carries out such measures in the course of its daily work activities and is committed to preventing any aspect of financial crime.

**7.1** Donor Identification Procedures – as set out in clause 5 of this policy, Donor ID and due diligence is performed on all new partners and where legal or regulatory standards require it.

**7.2** Due Diligence Questionnaire – this questionnaire acts as an application form for new partners and asks detailed questions about the business/person for purposes of performing due diligence checks. Partners are also expected to provide accompanying documents where applicable such as Certificate of Incorporation, Data Protection Certificate and Regulatory Body Membership etc.

**7.3** Traceable Transactions – all transactions carried out by are KAFEL AID recorded in such a manner that their original origin can be traced should the need arise.



**7.4** Records Management – all documents, accounts and transactions associated with Donors/partners will be retained as per the legal or statutory retention periods, which currently stands at ‘Close of Account +5 Years’.

**7.5** Reporting – Where required, an MLRO will be appointed and is responsible for monitoring all anti-money laundering measures and raising SAR’s when needed. All documents relating to money laundering reporting, business transactions, Donor identification and partner due diligence are retained for a minimum of 5 years.

We will ensure that the below minimums are met with regards to the information disclosed on any reports:

- Full details of the people involved
- Full details of the nature of their/your involvement
- The types of money laundering activity involved
- The dates of such activities
- Whether the transactions have happened, are ongoing or are imminent
- Where they took place
- How they were undertaken
- The approx./exact amount of money/assets involved;
- What has given rise to the suspicion

Using all of the information available at the time, the MLRO to make an informed decision using sound judgment as to whether there are reasonable grounds for knowledge or suspicion of money laundering and to enable them to prepare their report for the National Crime Agency (NCA), where appropriate.

**7.6** Ongoing Due Diligence – the partner engagement team is responsible for the ongoing due diligence checks for the life of the Donor/partner account, ensuring that all information is kept up-to-date and that no adverse information has arisen since the last monitoring check was performed.

Such checks are to be performed on all existing, active partners on a rolling annual basis.

## **8. Training**

**8.1** KAFEL AID has implemented a comprehensive Anti-Money Laundering and Financial Crime training program to ensure that all staff, in particular individuals responsible for transaction processing and/or initiating and/or establishing relationships, undergo AML knowledge, competency and awareness training. Our training methods and sessions are tailored to the organisation to ensure that staff are aware of the different possible patterns and techniques of money laundering that could occur in their everyday duties and roles.

## **9. Responsibilities**



**9.1** KAFEL AID will appoint an MLRO where regulatory or legally required and will comply with all UK legislation and regulations regarding the prevention and mitigation of money laundering.

**9.2** KAFEL AID will ensure that all staff are provided with the time, resources and support to learn, understand and implement processes and actions to prevent money laundering and will be expected to be vigilant at all times with respect to any acts of suspected financial crime. Any suspicions re to be reported to the Compliance Officer immediately.

**9.3** The Compliance Officer will ensure that any actual or suspected case of money laundering is detailed on a Suspicious Activity Report (SAR) and is reported to the National Crime Agency (NCA) with immediate effect.

## **10. MONEY LAUNDERING REPORTING OFFICER (MLRO)**

### **10.1 10.1 NOMINATED REPORTING OFFICER**

NAME: Omar Hassen Mohammed

POSITION: Admin

EMAIL: admin@kafelaid.org

### **10.2 10.2 DEPUTY REPORTING OFFICER**

NAME:

POSITION: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

EMAIL: \_\_\_\_\_

TEL: \_\_\_\_\_

<b>Updated on</b>	<b>Next review</b>	<b>Updated by</b>	<b>Approved by</b>
22/04/2020	21/04/2022 or after a significant change in operations or a significant incident, whichever is sooner	Executive Director	The Trustees on 09/05/2020



**Template: SUSPICIOUS ACTIVITY REPORT (SAR)**

Reported to: \_\_\_\_\_

Reported by: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

URGENT: YES/NO

Details of Suspected Activity:

(Please include all details of the incident and continue on a separate sheet if needed.)

Details of Suspected Business/Individual:

(Please include all details of business/person, including account number.)

Reported to SOCA: YES/NO

Date Reported: \_\_\_\_\_

Case Number: \_\_\_\_\_

Reported by: \_\_\_\_\_



# Anti-Bribery & Anti-Corruption Policy

## 1. What does the policy cover?

**10.1** This anti-bribery policy exists to set out the responsibilities of Kafel Aid and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

**10.2** It also exists to act as a source of information and guidance for those working for Kafel Aid. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## 2. Policy statement

**2.1** Kafel Aid is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Kafel Aid has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

**2.2** Kafel Aid will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

**2.3** Kafel Aid recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

## 3. Who is covered by the policy?

**3.1** This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

**3.2** In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.



**3.3** Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

## 4. Definition of bribery

**4.1** Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

**4.2** A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

**4.3** Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

**4.4** Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the executive director.

## 5. What is and what is NOT acceptable

**5.1** This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

### 5.2 Gifts and hospitality

Kafel Aid accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (*e.g.* a voucher or gift certificate).
- f. It is appropriate for the circumstances (*e.g.* giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.



- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a certain excessive value, as pre-determined by the executive director (usually in excess of £100).
- k. It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the executive director.

**5.3** Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the executive director, who will assess the circumstances.

**5.4** Kafel Aid recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

**5.5** As good practice, gifts given and received should always be disclosed to the executive director. Gifts from suppliers should always be disclosed.

**5.6** The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the executive director should be sought.

#### 5.7 Facilitation Payments and Kickbacks

Kafel Aid does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

**5.8** Kafel Aid does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

**5.9** Kafel Aid recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for the payment.
- c. Create a record concerning the payment.
- d. Report this incident to your line manager.

#### 5.10 Political Contributions

Kafel Aid will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.



## 5.11 Charitable Contributions

Kafel Aid accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

**5.12** Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

**5.13** We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the executive director.

## 6. Employee Responsibilities

**6.1** As an employee of Kafel Aid, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

**6.2** All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

**6.3** If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the executive director.

**6.4** If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Kafel Aid has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

## 7. What happens if I need to raise a concern?

**7.1** This section of the policy covers 3 areas:

- a.** How to raise a concern.
- b.** What to do if you are a victim of bribery or corruption.
- c.** Protection.

**7.2** How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Kafel Aid, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the executive director, the director, or the Head of Governance and Legal.

**7.3** Kafel Aid will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.



#### **7.4 What to do if you are a victim of bribery or corruption**

You must tell your executive director as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

#### **7.5 Protection**

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Kafel Aid understands that you may feel worried about potential repercussions. Kafel Aid will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

**7.6** Kafel Aid will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

**7.7** Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

**7.8** If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the executive director immediately.

## **8. Training and communication**

**8.1** Kafel Aid will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

**8.2** Kafel Aid 's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

**8.3** Kafel Aid will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

## **9. Record keeping**

**9.1** Kafel Aid will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.



## 10. Monitoring and reviewing

**10.1** Kafel Aid 's executive director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

**10.2** Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

**10.3** Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the executive director.

**10.4** This policy does not form part of an employee's contract of employment and Kafel Aid may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

Updated on	Next review	Updated by	Approved by
18/04/2020	17/04/2022 or after a significant change in operations or a significant incident, whichever is sooner	Executive Director	The Trustees on 09/05/2020