

Migrant English Project policies and procedures (updated 20th May 2022)

This document is intended for use by teachers and volunteers only

This document contains the Migrant English Projects four policies and accompanying procedures for making sure that everyone at MEP is safe, treated fairly and with respect, and knows what to do if there is a problem.

These policies should be read after first reading MEP’s Statement of Principles and Basic Rules at <http://mepbrighton.com/about-us/>

The four policies are: Equality and Human Rights; Safeguarding; Health and Safety; Confidentiality and Whistleblowing.

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1. Equality and Human Rights policy

Policy title:	Equality and Human Rights
Policy date:	13 December 2021
Review due:	Every 12 months by MEP at general meeting
Who this policy applies to:	All members (volunteers and service users) and visitors to MEP

Introduction

The aim of this policy is to ensure equal and fair treatment for all volunteers and people using our services and not to discriminate on grounds of race, colour, nationality, ethnicity, religion or belief, sex, gender assignment, marriage and civil partnership, pregnancy and maternity, responsibilities for dependants, sexual orientation, age, social class, criminal history, disability, HIV status, or age.

This policy is also important because the people who come to MEP may have escaped from violent situations and experienced hardship or trauma. They may be reluctant to go to officials, including the police, when they have a problem. So we need to make sure that MEP is a place where people are safe and are treated with respect, and where we all know what to do and who can help us if there is a problem.

Statement of general policy	Action / Arrangements
1. MEP aims to provide a safe and welcoming environment for all members (volunteers and service users) through safe recruitment practices	<ol style="list-style-type: none"> 1. All volunteers will complete an application form and provide details of two referees. 2. At least one reference will be taken up before a new volunteer is invited to join MEP 3. All new volunteers will attend an induction session that will include briefing them about confidentiality, protection issues and MEP's Statement of Principles
2. Volunteers are selected on the basis of their experience, personal attributes, qualifications, and commitment to our values. We do not discriminate on the basis of a criminal record. However, we provide services for vulnerable people and put their interests first.	<ol style="list-style-type: none"> 1. We ask applicants to disclose any unspent convictions in their application form. However applicants are not asked to disclose information about spent convictions. We will only consider an applicant's criminal record if we feel that s/he may pose a risk to our users. MEP will always review the individual circumstances of the case and explain any decision to the applicant. 2. Selection criteria relating to volunteer positions will not discriminate by asking for inappropriate qualifications or experience.
3. MEP aims to ensure our services are accessible to anyone who needs them regardless of: race,	<ol style="list-style-type: none"> 1. Provide training to relevant members of MEP around diversity and equal opportunities. 2. Consider where we are hosting our activities and whether these locations are accessible to people with

Statement of general policy	Action / Arrangements
<p>colour, nationality, ethnicity, religion or belief, sex, gender assignment, marriage and civil partnership, pregnancy and maternity, responsibilities for dependants, sexual orientation, age, social class, criminal history, disability, HIV status, or age,</p>	<p>differing needs. When possible, we will offer lifts to people with mobility issues to improve accessibility.</p> <ol style="list-style-type: none"> 3. When planning activities, consider their accessibility and appropriateness for different groups. 4. Ensure that materials, communication and venue are accessible to as wide a spectrum of the community as possible; considering a diverse range of needs and backgrounds: <ol style="list-style-type: none"> a) Keep written and spoken language clear and simple and avoid over-complicated terms, jargon, abbreviations and initials. b) Distribute our information as widely as possible; recognising that many people do not have access to the internet, i.e. display information at community and voluntary organisations and advertise through groups who provide services to certain sections of the community to ensure that we are reaching individuals and communities that we might not reach otherwise. c) When required, access interpretation and translation services to ensure everyone is adequately informed of all aspects of these policies and procedures.
<p>4. MEP will not tolerate any form of discrimination, harassment, bullying and abuse (see definitions below) from any volunteers, students or service users of MEP.</p>	<ol style="list-style-type: none"> 1. The 'Basic Rules' document outlines the behaviour expected from volunteers and service users. 2. The Whistleblowing policy and procedure provides a clear avenue for volunteers and service users to raise concerns about malpractice. 3. All volunteers have a personal responsibility for the practical application of this policy and will be briefed during their induction to ensure they are aware of the avenues available to report concerns and breaches of this policy.
<p>5. MEP believe that when there are problems or misunderstandings between members, it is important to resolve them quickly. MEP will therefore support anyone who needs mediation.</p>	<ol style="list-style-type: none"> 1. MEP encourages all members to try to resolve problems and misunderstandings with other members between themselves in a friendly way. 2. If problems arise between people that are not resolved or escalate, the Complaints and Whistleblowing procedure should be followed (see below). 3. Ensure all members are informed of this policy via the Basic Rules Document.

Definitions of Discrimination, Harassment, Bullying or Abuse:

Discrimination occurs when a person is treated less favourably than someone else because of a particular characteristic or characteristics. For example, it is discrimination if you treat someone less favourably because they are from another country, are a woman or disabled.

Harassment may be defined as unwanted and unwelcome behaviour that causes distress to the person it is directed against. It may be repeated or persistent, or it may happen on just one occasion.

Bullying is usually repeated, aggressive behaviour that causes physical or mental harm or distress to another person.

Abuse is a violation of an individual's human and civil rights by any other person or persons, through a single act, repeated acts or an act of neglect. Abuse may be physical, verbal or psychological.

Behaviour that comes into these categories includes, but is not limited to: unwelcome sexual advances like suggestive comments and touching; display of pornographic, racist or other offensive materials; racist or sexist remarks or jokes and other offensive language; personal insults and spreading rumours; verbal and written harassment by letter; telephone or e-mail; cyber bullying – sending abusive text or images by email, twitter etc; aggressive behaviour or threats; indecent or sexual assault; any act of violence; human trafficking and forced labour.

2. Child and Vulnerable Adult Safeguarding policy

Policy title:	Child and Vulnerable Adult Safeguarding
Policy date:	13 December 2021
Review due:	Every 12 months by MEP at general meeting
Who this policy applies to:	All members (volunteers and service users) and visitors to MEP

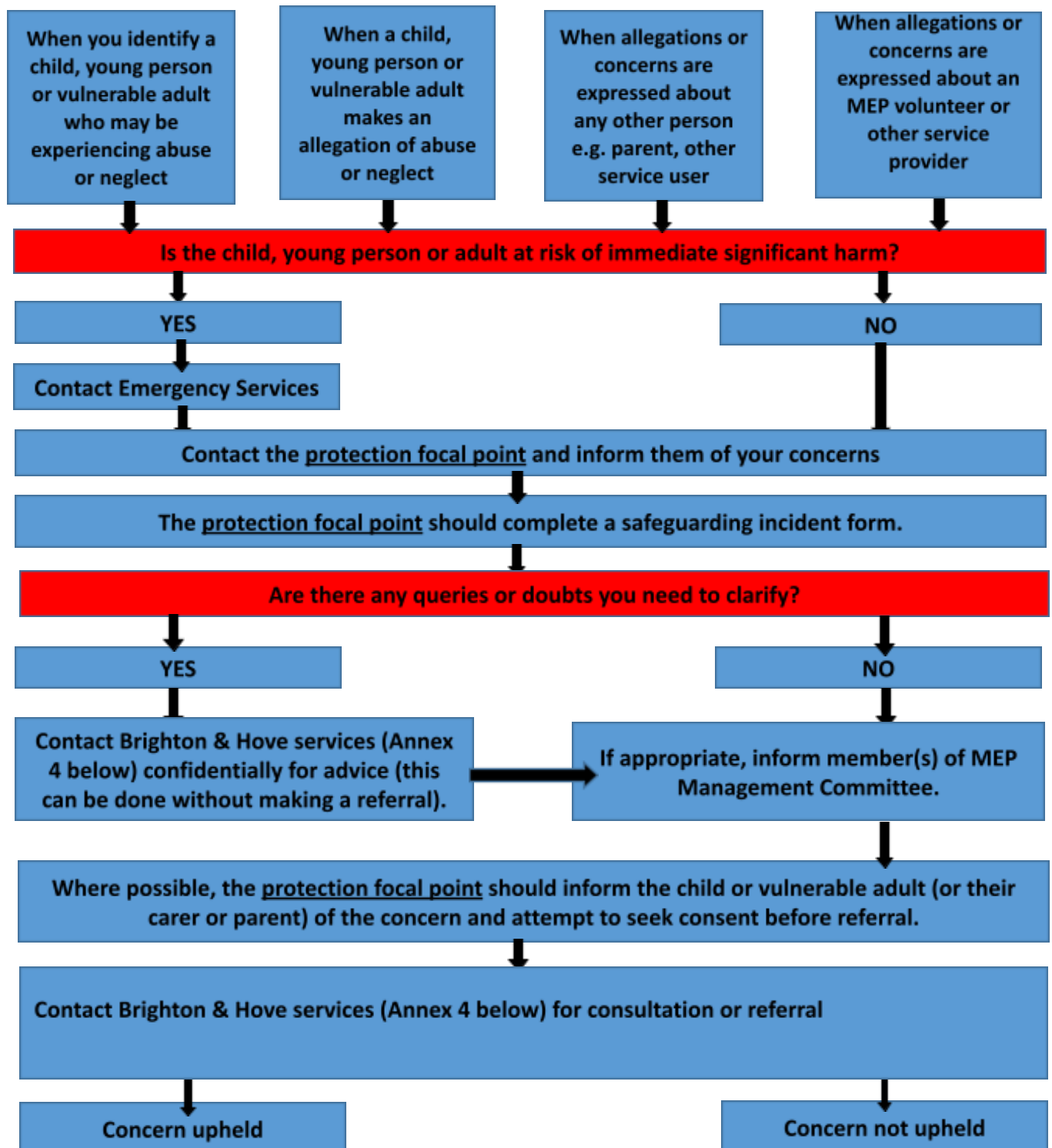
Prevention policy	Action
1) Ensure that safe recruitment procedures are in place and that all volunteers are suitable for their position.	<ol style="list-style-type: none"> 1. All volunteers will complete an application form and at least one reference will be taken up before a new volunteer is invited to join MEP. 2. All volunteers are asked for DBS (Disclosure and Barring Service) certificates and MEP arranges DBS checks for volunteers who do not already have one.
2) Ensure all volunteers fully understand and follow MEP's ethos and working practices, and their responsibility to ensure that all children and vulnerable adults coming to MEP are safe from harm.	<ol style="list-style-type: none"> 1. All new volunteers will attend a thorough induction including a briefing on all MEP policies and procedures, our statement of principles and what we expect of volunteers as well as what we can offer them (explained in the 'Information for volunteers' document' available on the MEP website). 2. Before starting at MEP, volunteers will be asked to sign a declaration form confirming that they have read all four MEP policies as well as the 'Information for volunteers document' and agree to comply with the requirements in these documents. 3. The 'Information for volunteers' document will be reviewed on a yearly basis (or sooner if required). 4. A log will be kept of all those who have signed their policies and a record of when these should be reviewed (once a year). 5. The 'Information for volunteers' document and all four policies will be published on MEP's website and made available at MEP's welcome desk.
3) Ensure activities are conducted in a safe and secure manner for all children and adults.	<ol style="list-style-type: none"> 1. All MEP members must read the Health and Safety, Equality and Human Rights and Confidentiality and Whistleblowing Policies and ensure they report potential risks to safety to the Protection Focal Point.
4) Ensure that the privacy of all those who come to MEP is respected. Photos will not be	<ol style="list-style-type: none"> 1. MEP will not take photographs of students or their children without prior completion of a consent form.

taken of adults or children without written consent.	2. A log will be kept with this information.
5) MEP is an adult-focused organisation and not a service for children. All children (under 18s) attending MEP <u>must be accompanied, and supervised</u> at all times by a parent or legal guardian.	<ol style="list-style-type: none"> 1. Ensure everyone coming to MEP is informed of the responsibilities of parents and legal guardians for supervising their children. 2. Display signs reminding everyone that children are the responsibility of their parent or legal guardian and cannot leave the room without them (including trips to the toilet). 3. Refer anyone under the age of 18 wishing to study English to the appropriate services for children (See Useful contacts on MEP website).

Intervention policy	Action
1) MEP will prioritise the safeguarding of children and cooperate with social services when necessary. All information about members and their children at MEP will be protected by a confidentiality procedure and will only be shared in line with strict guidelines.	1. Refer to Confidentiality and Whistleblowing Policy and see Safeguarding guidelines below.

Response policy	Action
1) MEP will ensure that there is a clear pathway for volunteers to report, record and monitor concerns.	4. Procedures for managing protection concerns are developed and reviewed on a yearly basis (or sooner if required).
2) Any concern or allegation of abuse or exploitation will be referred in line with this policy.	5. Procedures are communicated to all volunteers through induction and displayed at the welcome desk and on the website. 6. A volunteer who regularly attends MEP will be identified as Protection Focal Point. Their names should be clearly displayed and updated on the safeguarding procedure.
3) All volunteers at MEP have a responsibility to ensure they are able to recognise safeguarding concerns and deal with them appropriately.	1. All volunteers will read and confirm in writing that they will comply with MEP policies.

2.1 Child and Vulnerable Adult Safeguarding Quick View Procedure



3. Health and Safety

Policy title:	Health and Safety
Policy date:	13 December 2021
Review due:	Every 12 months by MEP at general meeting
Who this policy applies to:	All members (volunteers and service users) and visitors to MEP

Statement of general policy	Action / Arrangements
1) To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities	<ul style="list-style-type: none"> All volunteers will be fully briefed on Health and Safety procedures as part of their induction. This will be compulsory before starting with MEP. Further risk assessments for outings etc., should be carried out by a volunteer at MEP and recorded before the outing takes place.
2) To provide adequate training to ensure volunteers are competent to do their work	<ul style="list-style-type: none"> All volunteers will be fully briefed on Health and Safety procedures as part of their induction. This will be compulsory before starting with MEP.
3) To implement emergency procedures – including evacuation in case of fire or other significant incident. You can find help with your fire risk assessment (see https://www.gov.uk/workplace-fire-safety-your-responsibilities)	<ul style="list-style-type: none"> Emergency procedures including fire, to be clearly displayed and fire exits labelled. Everyone must ensure exits and walkways to be kept clear at all times. MEP Health and Safety Procedures to be clearly displayed at welcome desk. First-aid box and accident book are available. Accidents and ill health at work reported under RIDDOR: (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) (see www.hse.gov.uk).
4) To engage all volunteers and service users in ensuring MEP is a healthy and safe environment to work in and that all risks are quickly identified and addressed.	<ul style="list-style-type: none"> All volunteers should approach the Protection Focal Point with any Health and Safety concerns in the first instance. All volunteers at MEP should be aware of hazards and familiarise themselves with the Health and Safety Procedures and suggest updates and amendments where needed.
5) To ensure that the risk of transmission to users and volunteers during any epidemic or pandemic	<ul style="list-style-type: none"> MEP will ensure adequate ventilation and spacing during meetings and sessions

Statement of general policy	Action / Arrangements
(including Covid 19), is minimised	<ul style="list-style-type: none"> ● All volunteers will wash their hands and wear masks on entry to MEP and wear visors provided during lessons ● Volunteers will ask users to sanitize their hands and wear a mask or visor where possible
6) To minimize the risk of volunteers and users becoming infected with any epidemic or pandemic disease, including Covid 19, which is current at any particular time	<ul style="list-style-type: none"> ● All volunteers are required to be fully vaccinated in accordance with Government recommendations unless they are unable to for medical reasons ● Users are not required to be vaccinated but volunteers will make every effort to make available to them up-to-date Government guidance and information through such means as will enable them to make informed choices. ● Volunteers will update users on any significant changes to NHS recommendations as and when needed

3.1. Risk Assessment and Health and Safety Procedures

Fire

- All new volunteers should familiarise themselves with fire exits and the whereabouts and operation of fire extinguishers at the induction.
- To ensure swift evacuation a clear walkway must be maintained through the centre of the building.
- Do not attempt to tackle a fire yourself
- If you discover a fire, shout “FIRE!” to alert others in the building and if possible activate the fire alarm via the nearest call point. You will need to call 999 and ask for the fire brigade.
- Evacuate the building

Aggressive visitors

- Volunteers need to make sure that there is someone on the welcome desk to meet visitors. If you are having trouble with someone who wants to come in, close the door and ask another volunteer to come and help you.
- If you have any difficulties with anyone at MEP, stay calm and get someone else’s attention.
- If you feel that there is a genuine threat from the visitor either to themselves, or anyone else on the premises call the police.

Broken equipment and new hazards

- All volunteers at MEP need to be aware of hazards such as trailing cables, loose carpets, obstructions, broken kettles, broken glass, etc.
- If you become aware of a hazard you should attempt to rectify the problem if you feel you can do so safely, otherwise it should be reported to the Protection Focal Point.

Lone Working

- As a rule there should always be at least two people in the building. However where it is unavoidable the individual in question should notify another volunteer that they will be working alone including dates and times. They should also ensure they keep the main door locked and their mobile phone on their person at all times.

Accidents

- All accidents, injuries, and cases of ill-health requiring attention must be written in the accident book. Even if it's just a cut requiring a plaster!
- Under RIDDOR 2013, (Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations) certain injuries and occurrences should be recorded and reported to the Health and Safety Executive (HSE). <http://www.hse.gov.uk/riddor/index.htm>

4. Confidentiality and Whistleblowing

Policy title:	Confidentiality and Whistleblowing
Policy date:	13 December 2021
Review due:	Every 12 months by MEP at general meeting
Who this policy applies to:	All members (volunteers and service users) and visitors to MEP

Statement of general policy – Confidentiality	Action
1) MEP will ensure that any information volunteers share with MEP will be treated confidentially.	<ol style="list-style-type: none"> 1. All personal data, including names, contact details, criminal record and DBS checks will be: <ol style="list-style-type: none"> a) Stored securely e.g. in a locked cabinet or drawer at the home of a nominated member of MEP or password protected for confidential electronic information including emails. b) Adequate, relevant and not excessive c) Kept for no longer than is necessary
2) MEP will ensure that the privacy of service users is protected and that any information they share with MEP is treated confidentially.	<ol style="list-style-type: none"> 1. All service users will be asked only to disclose their first names. 2. Service users should not be asked to disclose personal information. 3. If a service user discloses personal information to anyone it will be treated confidentially in line with this policy. 4. Volunteers will be briefed at induction about what constitutes confidentiality, and asked to sign a declaration confirming that they will comply with this confidentiality policy.
3) Confidentiality may be broken by MEP when: <ul style="list-style-type: none"> ● It is deemed that the person to whom the information relates is a risk to themselves (as in a threatened suicide) or others (as in abusive or criminal activity). ● The person to whom the information relates, gives their consent. 	<ol style="list-style-type: none"> 1. See Whistleblowing and Child and Vulnerable Adult Safeguarding Policy.

Statement of general policy - Whistleblowing	Action
<p>1) MEP is committed to the highest standards of openness, probity and accountability. In line with that commitment, MEP upholds the rights of any volunteer, student or service user who has serious concerns about any wrongdoing within the organisation to come forward and express their concerns.</p>	<p>1. Develop and display a Complaints and Whistleblowing procedure to enable volunteers and service users to share their concerns (see below).</p>
<p>2) MEP will ensure that those who raise concerns of suspected serious malpractice are protected from dismissal, victimisation or any other detrimental treatment by MEP, provided they follow this policy.</p>	<p>1. Any report of misconduct must be made confidentially and in line with this policy. 2. Records must be kept confidentially 3. Information will only be shared on a “need to know basis”.</p>

4.1. Complaints and Whistleblowing Procedure

1. All volunteers, students and service users are encouraged to report in good faith (that is, without malice):
 - a. any problems they may be experiencing with another member of MEP which they cannot resolve alone, or
 - b. any genuine concerns or suspicion they have of inappropriate behaviour or malpractice which is happening at MEP or which involves MEP volunteers, service users, associated organisations or visitors. Inappropriate behaviour or malpractice could mean:
 - criminal and illegal activity (e.g. child abuse, human trafficking, fraud or corruption);
 - activity which constitutes a danger to health and safety or to the environment;
 - discrimination, harassment, and bullying;
 - the cover up of any of the things listed above; or any attempt to prevent an individual from raising their concerns.
2. Concerns may be raised orally or in writing and should include full details and, if possible, supporting evidence.
3. Concerns should be reported to:
 - a. the Protection Focal Point, or;
 - b. a member of MEP's management committee if you feel unable to raise your concern through the Protection Focal Point;
 - c. police and/or social services in the case of allegations of violence, abuse, illegal or criminal activity (see Annex 4 contacts below).
4. The Protection Focal Point or Management Committee must:
 - a. Ensure this procedure is explained to the person making the complaint and that they are fully aware of what will happen next and their rights.
 - b. Ensure that any person who, in good faith, raises concerns in line with this policy is protected from victimisation and other detrimental treatment.
 - c. Ensure that any person accused of alleged of inappropriate behaviour is fairly treated at all times and where appropriate has the right to put their own account of events forward at the earliest opportunity.
 - d. Base their actions on considerations of safety and well-being of any person implicated by the allegation and assess whether there are any immediate risks to adults or children.
 - e. Keep a record of their decision and the reasons for it – whether it is to share information with relevant agencies or not. If sharing information, then record what has been shared, with whom and for what purpose.
 - f. Ensure that the information shared is necessary for the purpose for which they are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (e.g. electronic documents should be password protected. Where appropriate pseudonyms should be used instead of names).

5. Depending on the type of allegation there are several options available to the group receiving the allegation:
 - a. Contact the relevant agencies for advice and if necessary referral (e.g. to police, adult social services, etc – see Annex 4 contacts below).
 - b. Investigate the allegations thoroughly and fairly and report back with evidence, conclusions and recommendations: For example, internal or external mediation, referral to authorities.
6. Confidential material relating to any complaint must be kept in a locked cabinet or draw at the home of a nominated member of the protection group and destroyed after one year if the incident is resolved informally, or handed to the appropriate authorities if it turns into a legal or criminal case.

Annex 1. Safeguarding Incident Form

CONFIDENTIAL

<p>Name of Protection Focal Point:</p> <p>Location:</p> <p>Date and time report received:</p>
<p>Report given to Protection Focal Point by:</p> <p>Name (as above):</p> <p>Position/occupation:</p> <p>Address / Contact Information:</p> <p>Relationship to Child:</p> <p>Date of suspected incident / incident:</p>
<p>Details of individual who is the subject of concern</p> <p>Name: _____ Sex: _____</p> <p>Age: _____ Date of birth (if known): _____</p> <p>Address/contact information (if known): _____</p> <p>Ethnicity: _____</p> <p>Languages spoken: _____</p> <p>Any other information about the child or the child's family and background: _____</p>
<p>Has an allegation been made against someone? YES / NO</p> <p>If yes, please complete with as much information as is known:</p> <p>Name (keep real name confidential – use a pseudonym): _____</p> <p>Sex: _____ Age: _____</p> <p>Address/contact information (if known): _____</p> <p>Occupation/employment details: _____</p> <p>Relationship to subject of complaint: _____</p> <p>Current location of alleged perpetrator: _____</p> <p>Other Information: _____</p>

Details of concern/incident: what, who, where when. Describe any sequence of events as they happened if possible:

Who else knows about the concern/incident?

a) authorities (give names, positions and contact details where possible)

b) family members and or other individuals including MEP volunteers (give full names and contact details if possible)

Actions taken and/or analysis by Protection Focal Point

Decision(s) made by the Protection Focal Point for further action

Referral details if applicable (including nature of referral, person or organisation referred to and date):

Signed off by (name and signature of the Protection Focal Point):

Date:

Annex 2. Photography and Video Consent Form

It is MEP's policy that when we are planning to use an image of an adult or child (photograph or video) for MEP materials, consent must be obtained from the adult or child's parent or legal guardian. The purpose of this form is:

- To provide information for the person giving consent so they can make an informed decision.
- To be clear about how images will be used and what the consent applies to.

Note: A child (anyone under the age of 18 years) can give their own consent if they are old enough to understand. However, a parent or legal guardian must also sign the form on their behalf (see below).

Declaration of Consent

1. I, (insert name) give MEP permission to use any photographs or videos shot during MEP activities which contain my image, for any purposes in relation to MEP's work. These could include: the right to use them in any advertisements and other publicity materials, direct mail, books, newspapers, magazine articles, television programmes and internet publications throughout the world. If there are other reasons please explain here:
.....
.....

I understand that I do not have any rights of ownership or other claim over the images.

2. I understand that if I wish the image to be identified with a false name I will specify below.
3. I understand that MEP will keep all the images and use them for such period as it considers appropriate, and may move them into its image archive once they are no longer needed.
4. I wish for the image to be identified with a false name YES/NO (delete as applicable)

Signed Date

To be signed by a parent / guardian if this consent relates to a child (anyone under 18 years old):

I, (insert name) the parent(s)/guardian(s) of:

(insert child's name) hereby give MEP permission to use any photographs or videos shot during MEP activities which contain my child's image, for any purposes in relation to MEP's work as described above and understand points 1 -5 above.

Signed Date

Annex 3. Training Courses for Volunteers

Volunteers are encouraged to attend training (mostly free) in areas such as health and safety, child protection and first aid. Any volunteers that attend training (or have already done so) are asked to let MEP know so we can keep a record of who has experience in particular areas. If you wish to attend one of these trainings on behalf of MEP, please contact the MEP admin at mepbrighton@googlegroups.com

Course	Provider	Contact
Introduction to Safeguarding and Child Protection	Safety Net	https://www.safety-net.org.uk/
First Aid	British Red Cross	https://www.redcrossfirstaidtraining.co.uk/where-we-train/
Health and Safety at Work	IOSH	http://www.iosh.co.uk/Training.aspx
First aid for the public	British Red Cross	http://www.redcrossfirstaidtraining.co.uk/Courses/First-aid-public-courses.aspx
Fire Marshall Courses	St John's Ambulance	https://www.safety-net.org.uk/
Food Hygiene – level 1 and 2		https://www.brighton-hove.gov.uk/business-and-trade/food-safety/book-food-safety-training

Annex 4. Important Contacts

For Police, Fire or Ambulance: Tel 999 (emergency) or 101 (if it is not an emergency)

Brighton & Hove Safeguarding Children Partnership (BHSCP): Tel (01273) 290400,
email: FrontDoorForFamilies@brighton-hove.gov.uk

Brighton & Hove: Help for an adult at risk of abuse or neglect: Monday to Friday, 9am to 5pm, phone the Access Point on 01273 29 55 55,
email hascsafeguardinghub@brighton-hove.gov.uk

Brighton & Hove Local Authority Designated Officer (LADO): Tel 01273295643 Email
Darrel.clews@brighton-hove.gov.uk

Safety Net: Tel (01273) 411613 / www.safety-net.org.uk

NSPCC: www.nspcc.org.uk

For details of other organisations and resources, see [Useful organisations](#) on MEP website