



Safeguarding Policy

1. Introduction

MAP is a charity whose vision is a future where all Palestinians can access an effective, sustainable and locally-led system of healthcare, and the full realisation of their rights to health and dignity.

Through MAP's programmes in the West Bank (including East Jerusalem), Gaza, and Lebanon, it delivers projects directly and works with trusted and experienced local partners to achieve this vision. MAP's programmes, designed and delivered by Palestinians with support from across the organisation, provide access to essential health services and build local knowledge and skills to address Palestinian health problems.

The purpose of this policy is to protect people, particularly children and vulnerable adults, from any harm that may be caused during the course of MAP's work, in particular relating to:

- the conduct of staff or personnel associated with MAP including volunteers, contractors and partners.
- engagement with activities which are funded by MAP or otherwise closely connected to MAP.

MAP believes that everyone we come into contact with, (including our staff and volunteers) regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. MAP has a zero tolerance policy towards all forms of abuse within the workplace, towards all people including MAP staff, Partners, the communities we work with and associates. Abuse includes sexual, physical, emotional abuse and neglect, harassment, bullying including cyber-bullying. MAP recognizes that abuse comes as a result of power imbalances. It is particularly important to recognize power imbalances within the workplace, and try to mitigate against risks of safeguarding abuses.

Considering the nature of MAP's work, this policy lays out its commitments for safeguarding and informs MAP staff, volunteers, contractors and Partners of their responsibilities in relation to safeguarding. This policy sets out the steps MAP will take to ensure its compliance with the Charity Commission's guidance on and international humanitarian and development sector best practice safeguarding and people protection, and focuses on safeguarding children and vulnerable adults.

This policy does not cover policies relating to harassment and bullying, whistleblowing or anti-terrorism, which policies we have signposted to under the heading Linked Policies, below.

1.1 Children

- 1.1.1 MAP believes that all forms of abuse and exploitation of children (defined as anyone under the age of 18) are unacceptable. Safeguarding the health, safety and wellbeing of children, whether direct or indirect beneficiaries, is an integral component of all

MAP programmes and MAP is committed to preventing child abuse and neglect from taking place. The possibility that staff, trustees, volunteers, contractors, donors or Partners might abuse children is one that MAP takes seriously.

1.1.2 MAP is committed to the primacy of the rights of children as set out in the UN Convention on the Rights of the Child (1989). These can be summarised as the 3Ps:

- Protection from abuse, exploitation or exposure to danger.
- Provision of care including shelter, food and safety, health care and education.
- Participation, including the right to be given information and to express themselves.

This Safeguarding Policy is concerned with the first element – protection – but the importance of the provision of care and participation of children will inform all MAP programmes.

1.1.3 All staff and representatives must be aware of their individual responsibility to promote the safeguarding of children and recognise where risks of abuse and exploitation may arise within our programmes. The training described below will address the nature and extent of responsibility for safeguarding of children for all groups of staff, volunteers and Partners.

1.2 Vulnerable adults

A vulnerable adult is any person who is aged 18 years or over who, because of their needs for care and support is unable to protect themselves from either the risk of or the experience of abuse or neglect. Whether an individual is a vulnerable adult or not is something which can change with their circumstances and is not fixed. A vulnerable adult may have a mental illness, a learning disability, a physical disability, be frail or be otherwise in need of additional assistance to protect themselves from harm or exploitation, for example, due to social factors such as poverty, unemployment, displacement or lack of services or support.

MAP has a similar zero-tolerance approach to all forms of abuse and exploitation of all adults, and particularly pays attention to vulnerable adults. The above principles in 1.1.1 and 1.1.3 apply equally to all vulnerable adults.

1.3 Sexual exploitation of adults

MAP will not tolerate any form of sexual exploitation of adults. Sexual exploitation is defined as an actual or attempted abuse of someone's position of vulnerability, differential power or trust, to obtain sexual favours, including but not only, by offering money or other social, economic or political advantages. It includes trafficking and prostitution. The principles outlined in 1.1.1 and 1.1.3 above apply in this context too.

2. Scope

This policy applies to all those who work with MAP or on its behalf, including:

- All staff of MAP whether they work on a full-time or part-time basis or are employed internationally or nationally.

- Persons employed on short-term contracts, such as consultants, researchers, evaluators etc.
- Trustees, patrons and volunteers.
- Visitors to MAP's programmes including donors, celebrities, politicians, journalists etc.
- Local Partners who do not yet have their own safeguarding policy and with whom MAP has agreed that they must adhere to MAP's policy until they implement their own safeguarding policy within a reasonable timescale. See 7 (Safeguarding and Partner) below for more details.

3. How MAP ensures children and adults are safeguarded within our work

MAP takes seriously its responsibility to safeguard children and adults and has the following strict procedures to minimise the risk of harm to all community members we work with:

- 3.1 All trustee, staff, volunteer and consultant recruitment will be conducted in accordance with this policy and will prioritise the safeguarding of children and adults. Safeguarding responsibilities will be made explicit in all stages of the recruitment process, from advertisement and job description to interview. All staff, volunteers, trustees, suppliers, and consultants engaged by MAP, where appropriate, will be required to:
 - 3.1.1 Sign a declaration acknowledging their understanding and acceptance of this Safeguarding Policy and Safeguarding Code of Conduct (attached at Schedule 1). (The Safeguarding Code of Conduct also applies to anyone who visits MAP projects, including, but not limited to, journalists, celebrities and corporate sponsors – see 5 (Safeguarding Code of Conduct) below for more detail.)
 - 3.1.2 Complete a declaration of criminal convictions, providing details of any criminal convictions or cautions, in accordance with the relevant legislation.
 - 3.1.3 Declare any previous allegations, investigations, proceedings or disciplinary hearings that relate to the care, safety or harm to children or adults.
 - 3.1.4 Satisfactorily complete the appropriate criminal records checking process (whether in the UK or overseas) – for more details, see 3.2 below.
 - 3.1.5 Provide appropriate referees to MAP, although MAP reserves the right to contact any former employer or similar for a reference and/or safeguarding check through the Misconduct Disclosure Scheme, consider any gaps in work history, and check qualifications and certifications, and, where appropriate, confirm a person's right to work in the UK, or in the relevant regional overseas office, as appropriate.
 - 3.1.6 When interviewed for their role, be asked about their motivation for working with MAP.
- 3.2 Criminal records checks – when MAP engages trustees, staff, consultants or volunteers it will:
 - a) Assess whether a role is eligible for a standard, enhanced or enhanced (with a check of the barred list) DBS check (or equivalent criminal records check overseas) and, if so, carrying out the highest level of those checks for which the role is eligible; and

- b) where a role is not eligible for a standard, enhanced or enhanced (with a check of the barred list) DBS check, MAP will carry out a risk assessment to identify relevant risk factors, including, (1) whether the post-holder may have any contact with children or at-risk adults and (2) the nature, length and frequency of the contact and whether the contact would be supervised or unsupervised, in order to determine whether it would be appropriate to require a basic DBS check for the role.

MAP also commits to:

- a) Developing a zero tolerance approach exploitation, abuse and harassment, and a 'safety culture' within MAP that creates and maintains protective environments. MAP is committed to taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.
- b) Ensuring MAP representatives are fully cognisant of safeguarding issues and receive training on this policy and are aware of their responsibilities to report safeguarding concerns and of who to go to report such concerns (see paragraph 4 below).
- c) Taking appropriate and proportionate action if the policy is not complied with.
- d) Maintaining adequate insurance in relation to MAP's activities and the people involved, to the extent that it is reasonably available.
- e) Carrying out appropriate due diligence on any Partners, which may include ensuring they have appropriate controls and safeguarding measures in place, meet any applicable international standards in carrying out their activities, and integrating safeguarding and onward reporting requirements in MAP's partnership agreements, taking account of the Charity Commission's relevant guidance.
- f) Ensuring that safeguarding concerns are addressed promptly and through the appropriate channels.
- g) Reporting safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, within the principles of a survivor-centred approach, and in accordance with best practice. MAP will fully risk assess such reporting to ensure that making a report is not likely to cause further harm to the individual(s) to whom harm has (actually, allegedly or potentially) already been caused.
- h) Ensuring that its privacy policy remains suitably updated so that it is clear that, in keeping with MAP's zero tolerance policy, it will report wrongdoing on the part of MAP representatives and Partners to appropriate authorities, will share such information (for example, with the police/other authorities) as may be necessary to protect individuals from harm, within the principles of a survivor-centred approach, and will provide fair and accurate references, which appropriately reflect MAP's experience and interaction with MAP representatives and Partners.

4. Training

- 4.1 All MAP staff (including consultants) and trustees will complete the required training within the timeframes stipulated and undertake refresher training every two years. This

training will be designed to help them recognise abuse and exploitation and understand where risks may arise. It will clarify their own responsibilities and help them meet their safeguarding obligations under this Safeguarding Policy and Safeguarding Code of Conduct.

- 4.2 MAP volunteers will complete the required training prior to attending a mission to MAP projects. Subsequently, volunteers employed by the NHS will submit evidence of completing their annual mandatory NHS safeguarding training and must undertake the required refresher training every five years. For volunteers recently retired, they must undertake refresher training every two years.
- 4.3 Staff, volunteers and trustees shall not be permitted to visit MAP's projects unless they have completed the training required of them and provided a certificate of successful completion.
- 4.4 In addition to the online training, MAP programme staff will receive more comprehensive, contextualised case-based safeguarding training during their induction period. It is the responsibility of the safeguarding lead and regional overseas office Safeguarding Focal Points (Directors of Operations) to ensure this is delivered. Refresher training will be delivered every two years.
- 4.5 The training will emphasise the requirement on all staff, volunteers, trustees and MAP supporters to report suspected abuse, and clarify how the responsibilities for investigation will be assigned.

5. Safeguarding Code of Conduct and Breaches of this Policy and Code of Conduct

- 5.1 MAP has a Safeguarding Code of Conduct that is mandatory for all those working with MAP or on its behalf to follow. Consultants, evaluators, researchers, and those visiting MAP's programmes are required to read it, understand it, and sign it to implement it within their work with MAP. The Code of Conduct gives clarity on acceptable and unacceptable behaviour in the company of children and adults.
- 5.2 Failure to follow this Safeguarding Policy and the Safeguarding Code of Conduct will be treated as a very serious matter and will be treated as a potential cause for disciplinary action (in the case of employees of MAP) or termination of the relationship by other means. Breaches by trustees may result in their removal from office. Breaches by Partners may result in the termination of the relationship in accordance with the relevant partnership agreement.

6. Safeguarding children and adults involved in communications or media work

- 6.1 MAP seeks to ensure that children and adults are not harmed by supporting our communications and media work.
- 6.2 MAP communications should use pictures that are decent and respectful. We recognise there are times when children or adults are victims, for example of war or conflict, but presenting the reality of such a situation should never be done at the expense of the child or adult's dignity.

- 6.3 Appropriate written or verbal consent should be sought from the child (and his/her parent(s)/guardian(s)) or adult (or his/her legal representative).
- 6.4 The safety of the child or adult will remain fundamental to MAP's work and information that could be used to trace the child (or the child's family) or adult will not be used on MAP's website or in any other form of communication.

7 Safeguarding and Partners

- 7.1 "Partner" means any organisation which receives funding from MAP, which collaborates with MAP to deliver any of its programmes or activities, or which is otherwise associated with MAP's name and brand. This policy is intended to work alongside the equivalent policies of MAP's Partners, where appropriate. MAP expects that the principles and approaches already shared with Partners mean that they will fully support the values and commitments set out in this policy and compliance with this will be a condition in the written grant agreement.
- 7.2 MAP recognises the importance of its Partners maintaining robust and effective safeguarding arrangements for children and adults. This is reflected in all partner agreements.
- 7.3 MAP programme staff will undertake an assessment of all partner agencies and their capacity and procedures in relation to safeguarding. A safeguarding action plan will be developed in collaboration with the partner and monitored on a regular basis. MAP will support capacity building and training as appropriate, but at least every two years.
- 7.4 Partners without an appropriate safeguarding framework will not be eligible to work in partnership with MAP, unless they provide MAP with plans to illustrate how they will develop and implement safeguarding arrangements within a reasonable timescale. MAP support will be given as appropriate and feasible. The partner must always adhere to MAP's Safeguarding Code of Conduct or their own equivalent document.
- 7.5 Partners not committed to implementing their own safeguarding procedures within agreed time frames will not be considered for partnership with MAP. In exceptional circumstances, where a prospective partner/Partner does not have its own safeguarding policy in place for the time being, MAP may agree with that Partner that they must adhere to MAP's policy until they implement their own safeguarding policy within a reasonable time frame.
- 7.6 MAP will take all necessary steps to ensure that there is a culture of openness and trust. MAP will encourage the Partner to highlight safeguarding issues and reassure the partner that this will not necessarily compromise the Partner's relationship with MAP.
- 7.7 MAP will ensure that each Partner has appointed a member of staff who will be responsible for promptly reporting to MAP's Safeguarding Focal Point (or, if they are unavailable, another appropriate person) any safeguarding concerns that arise in, or relevant the context of the partnership.
- 7.8 If an allegation of abuse of a child or adult is reported to a Partner organisation and appropriate actions are not taken, then MAP will consider suspension of the partnership agreement pending further investigation.

8 Roles and responsibilities

- 8.1 The Board of Trustees and Senior Management Team (SMT) have special responsibilities in relation to the oversight and implementation of MAP's safeguarding mechanisms. Directors and Programme Managers have safeguarding responsibilities incorporated into their job descriptions and one annual objective relates to their safeguarding responsibilities, to be reviewed during annual appraisals. There are Terms of Reference for Safeguarding Focal Points (Directors of Operations) – see **Schedule 2**.
- 8.2 The **trustees** of MAP have ultimate responsibility for ensuring that MAP protects from harm all those who come into contact with it. The trustees have oversight of MAP's safeguarding and linked policies and oversee MAP's handling of safeguarding reports. The trustees also have responsibility for deciding whether any serious incident reports need to be made to the Charity Commission in relation to safeguarding incidents.
- 8.3 MAP has a **Safeguarding Trustee**, who is suitably qualified in safeguarding matters. The appointment of a Safeguarding Trustee will not detract from the fact that all the trustees share collective responsibility for safeguarding within MAP.
- 8.4 MAP's **Safeguarding Lead** will always be a suitably qualified/experience member of MAP's SMT.
- 8.5 MAP also has a **Deputy Safeguarding Lead** who is a Head of/senior programme manager level and has training on safeguarding. The Deputy Safeguarding Lead will function as the Safeguarding Lead in the absence of the Safeguarding Lead.
- 8.6 **Safeguarding Focal Points** are the MAP Directors of Operations in each of Gaza, Lebanon and West Bank. Local staff in those offices should report any concern to them immediately. The relevant Safeguarding Focal Point will then inform the Safeguarding Lead in UK and the two will work together to manage concerns. The Safeguarding Focal Points also have a responsibility to ensure the local programmes teams are implementing capacity building work on safeguarding with local Partners. If the safeguarding concern relates to the Safeguarding Focal Point, local staff should report the concern to the Safeguarding Lead in the UK.
- 8.7 **Every individual** who becomes aware of any suspicions or allegations regarding harm to children or vulnerable adults is required to report this immediately to the Safeguarding Focal Point/Safeguarding Lead (as appropriate).
- 8.8 The primary responsibility for oversight of safeguarding mechanisms within MAP lies with the SMT, directly accountable to the Board. MAP's SMT is responsible for the implementation of this Safeguarding Policy across all areas of MAP's operations and ensuring that all records of recruitment, training and investigations of suspected/alleged abuse are compiled for reporting to the Board on a quarterly basis. In addition, an Annual Safeguarding Report, summarising the previous year's safeguarding actions, will be presented to the Board at their first meetings each year.
- 8.9 The SMT has the primary responsibility to ensure that this Safeguarding Policy and Safeguarding Code of Conduct are up to date and fit for purpose. This Safeguarding Policy and Safeguarding Code of Conduct will be reviewed at least every year and

following any significant safeguarding incident or change in legislation/sectoral guidelines.

8.10 Contact details for these individuals can be found in 11 below.

9. Reporting and investigating alleged or suspected abuse

- 9.1 All those working with MAP or on its behalf must follow the procedures for reporting suspected or alleged abuse of children or adults.
- 9.2 Should anyone working with MAP or on its behalf receive any information about, or observe, actual or suspected abuse regarding any area of MAP work he or she must immediately inform the relevant MAP Safeguarding Focal Point, or Safeguarding Lead.
- 9.3 Where a member of staff or a representative considers that the MAP reporting procedure cannot be safely used or has been exhausted and risks to children or adults remain, they are entitled/expected to use the MAP Whistleblowing Policy.
- 9.4 Whenever a MAP Safeguarding Focal Point receives a report of suspected/alleged abuse the relevant DoP, Safeguarding Lead, Chief Executive Officer and Safeguarding Trustee will discuss the report and agree whether and how to conduct an appropriate investigation. This decision will then be reported to the Board Chair and, if a serious concern has been raised, the Charity Commission and other statutory agencies such as the police, as appropriate. Subsequent actions will follow MAP's "Organisational Response to Safeguarding Concerns" and "Region-Specific Investigation" algorithms.

10. Reporting serious incidents to the Charity Commission and other external bodies

- 10.1 MAP is committed to reporting all relevant incidents to the Charity Commission for England and Wales via a serious incident report, in accordance with the Charity Commission's [serious incident reporting guidance](#).
- 10.2 MAP will also report incidents to other regulatory bodies and government departments or funding bodies, where appropriate. Where there is evidence that criminal activity may have taken place, or concerns have been raised in relation to a child or vulnerable adult, MAP will report to the relevant police and/or safeguarding authorities as appropriate, taking appropriate account of the Charity Commission's guidance in this respect.
- 10.3 Decisions to report to external authorities (including reports to local law enforcement agencies outside of the UK) will be fully risk assessed and anonymisation/pseudonymisation considered when necessary.
- 10.4 Reporting will not be avoided on the basis that it may harm MAP's reputation or give rise to litigation and any concerns in relation to data protection will not act as a barrier to reporting, although they will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.
- 10.5 If a Partner reports a safeguarding incident to MAP (via the relevant Safeguarding Focal Point or otherwise), the matter will be referred to the Safeguarding Lead. If necessary, further information will be sought about the incident, for example the Partner may be

asked to clarify various details. The Safeguarding Focal Point will monitor the situation, keeping in touch with the Partner and will keep a record of the action taken by both MAP and the Partner to resolve the situation. Depending on the nature of the incident, it may be reported to the trustees and/or Charity Commission. The next steps will depend upon the nature of the incident and the Partner's response to it, but they may include suspending the partnership agreement immediately until more information is provided.

11. Linked policies

This Safeguarding Policy and Safeguarding Code of Conduct should be read alongside the following linked policies:

- Bullying & Harassment Policy
- Whistleblowing Policy
- Grievance Policy
- Complaints Policy
- Data Protection Policy
- Equality, Diversity and Inclusion Policy

12. Contacts

The **Safeguarding Lead** is:

Name:	Sameer Sah
Direct:	+44 (0) 203 869 1320
Mobile:	+44 (0) 744 216 3699
Email:	sameer.sah@map-uk.org

If the Safeguarding Lead is unavailable for any reason, or the concern relates to the Safeguarding Lead, it must be reported to the Deputy Safeguarding Lead.

The **Deputy Safeguarding Lead** is:

Name:	Melanie Coyne
Direct:	+44 (0) 203 869 1319
Mobile:	+44 (0) 7900 364166
Email:	Melanie.Coyne@map-uk.org

The **Safeguarding Trustee** is:

Name:	Muna Abbas
Direct:	

Mobile:	+44 (0) 7584 437307
Email:	

The **Gaza Safeguarding Focal Point** is:

Name:	fikr@map-uk.org
Direct:	+970 (0) 82 821 355
Mobile:	
Email:	fikr@map-uk.org

The **Lebanon Safeguarding Focal Point** is:

Name:	Wafa Dakwar
Direct:	+961 1 850602 or +961 1 850603
Mobile:	+961 71674635
Email:	wafa.dakwar@map-uk.org

The **West Bank Safeguarding Focal Point** is:

Name:	Aisha Mansour
Direct:	+970 (0) 22 959 369
Mobile:	
Email:	aisha.mansour@map-uk.org

Publishing this policy

MAP will ensure that this policy is always publicly accessible on its website.

Review

MAP is committed to reviewing this policy and good practice regularly. This policy will be reviewed by the trustees at least annually or when an incident occurs that highlights a need for change – whichever occurs first.

Date of latest policy review: 30th June 2025

This policy will be next reviewed no later than: 30th June 2026

Schedule 1 – Safeguarding Code of Conduct



Safeguarding Code of Conduct

Children

Keeping children safe is a top priority in everything we do. We have a zero-tolerance approach to all forms of child abuse and exploitation by any of our representatives. It applies to all of MAP's staff, trustees, volunteers, consultants or partners. It also applies to anyone who visits MAP projects, including, but not limited to, journalists, celebrities and corporate sponsors.

A child is anyone under the age of 18 – wherever you are

- **Do** treat all children with dignity and respect
- **Do** respect a child's right to personal privacy
- **Do** ensure that any photographs of children used for communications respect the child's dignity and privacy, and have the consent of the child and/or parent/guardian
- **Do** plan MAP activities with children to have more than one adult present; or be within sight or hearing of another adult
- **Do** ensure that there are separate sleeping areas for MAP representatives and children with whom they are working
- **Do** tell your colleagues where you are and what you are doing when you are working with children
- **Do** treat all children according to their needs, do not show favouritism
- **Do** remember someone might misinterpret your actions, even if you mean well
- **Do** allow children to talk about their concerns
- **Do** ensure that programme feedback from beneficiaries, including children, is collected and reviewed
- **Do** assess programmes for possible unrecognised dangers to children
- **Do** make sure that anyone who works with MAP is made aware of this code of behaviour
- **Do** take all allegations, concerns and suspicions of abuse seriously and report them
- **Do** challenge attitudes and behaviours that contravene this code of behaviour
- **Do not** trivialise child abuse
- **Do not** engage in any form of sexual activity with anyone under the age of 18, with or without consent, and regardless of the age of consent or custom locally
- **Do not** take part in inappropriate physical, verbal or sexual behaviour with or in the presence of children (including online or via mobile phones)
- **Do not** physically, sexually or emotionally harm, or threaten to harm a child
- **Do not** send private messages to children you've met through MAP, for example private messaging on social media
- **Do not** drink alcohol or use harmful substances when working with children and never supply alcohol or harmful substances to a child
- **Do not** do things of a personal nature for a child that they can do for themselves, or ask a child to do anything of a personal nature for you

- **Do not** place children in unsafe situations
- **Do not** engage in relationships which could be an abuse of trust, for example a sexual relationship with a beneficiary family member
- **Do not** rely upon your good reputation to protect you from any complaints or allegations
- **Do not** allow concerns, allegations or suspicions of abuse to go unreported
- **Do not** engage in coercive or controlling behaviour, designed to harm, punish or frighten a child, or make them dependent by isolating them from sources of support, or exploit them for personal gain

WHAT DO I DO IF...?

1. A child tells you that they are being abused or exploited, or you suspect they may be, you must:

- Ensure the child is not in immediate danger
- Allow the child to speak without interruption and accept what they say
- Be understanding and reassuring but do not give your opinion
- Do not promise to keep secrets, but do say you need to tell someone who can help
- Write careful notes of what was said, using the actual words wherever possible
- Contact a MAP Safeguarding Focal Point immediately (either the regional Director of Operations or UK Director of Programmes)

2. There is a concern, complaint or allegation about an adult or yourself involving a child, you must:

- Ensure the child is not in immediate danger
- Write careful notes of what you witnessed, heard or were told
- Contact a MAP Safeguarding Focal Point immediately (either the regional Director of Operations or UK Director of Programmes)

REMEMBER

It is your duty to report – DO NOT investigate

Ensure you know who your MAP Safeguarding Focal Point is

If you're in the UK and you believe a child to be at immediate risk of significant harm contact the Police by dialling 999

If you're in any doubt about what to do contact your MAP Safeguarding Focal Point

Vulnerable Adults

MAP has a similar zero-tolerance approach to all forms of abuse and exploitation of vulnerable adults. A vulnerable adult is any person who is aged 18 years or over who, because of their needs for care and support is unable to protect themselves from either the risk of or the experience of abuse or neglect. Whether an individual is a vulnerable adult or not is something which can change with their circumstances and is not fixed. A vulnerable adult may have a mental illness, a learning disability, a physical disability, be frail or be otherwise in need of additional assistance to protect themselves from harm or exploitation, for example, due to social factors such as poverty, unemployment, displacement or lack of services or support. All the principles outlined above apply to vulnerable adults, and the reporting mechanism for any concerns is also identical to that outlined above.

Sexual Exploitation of Adults

MAP will not tolerate any form of sexual exploitation of adults. Sexual exploitation is defined as an actual or attempted abuse of someone's position of vulnerability, differential power or trust, to obtain sexual favours, including but not only, by offering money or other social, economic or political advantages. It includes trafficking and prostitution. The reporting mechanism for any concerns is identical to that outlined above.

I undertake to discharge my duties and to regulate my conduct in accordance with the requirements of this Code of Conduct and to comply with MAP's safeguarding policy and procedures.

Name:

Signature:

Date:

Terms of Reference for Safeguarding Focal Points

1. Background

MAP believes that all forms of abuse (sexual, physical, and emotional abuse and neglect) and exploitation of children and vulnerable adults by MAP staff and related personnel are unacceptable. They are a gross violation of human rights and an abuse of a position of power over a vulnerable population. Safeguarding the health, safety and wellbeing of children and adults, whether direct or indirect beneficiaries, is an integral component of all MAP programmes and MAP is committed to preventing abuse, exploitation and neglect from taking place and take all steps necessary to safeguard those within our operations.

2. Purpose

MAP's Senior Management Team is responsible for the implementation of MAP's Safeguarding Policy and procedures across all areas of operation. The purpose of the Safeguarding Focal Point is to have a designated senior staff member in each office who coordinates the implementation of MAP's safeguarding policy and procedures. MAP's Directors of Operations (DoOs) in Gaza, West Bank and Lebanon are MAP's safeguarding Focal Points, working closely with MAP's Safeguarding Lead in the UK office.

3. Scope of Work

Key roles and responsibilities of Safeguarding Focal Points include:

Prevention

Internal

- Fostering a culture among staff that recognises the importance of safeguarding across all MAP's operations.
- Ensuring all new programme staff receive MAP's full case-based safeguarding training within a reasonable timeframe, and complete refresher training every two years.
- Ensuring all non-programme staff have completed the online *Kaya Safeguarding Essentials* training course, and complete refresher training every two years.
- Effectively communicate Safeguarding policies and reporting channels to all staff. Work with human resource staff to ensure all staff sign MAP's Safeguarding Code of Conduct and that screening for past safeguarding/sexual abuse and exploitation (SEA) violations is a regular part of the recruitment process.
- Ensure MAP staff are aware of MAP's Whistleblowing and Dignity at Work policies.

External

- Support programme staff to ensure all implementing Partners have completed the relevant MAP-recommended safeguarding training (or equivalent), complete refresher training every two years, and signed MAP's Safeguarding Code of Conduct (or their own equivalent).
- Support programme staff to develop safeguarding risk assessments and action plans with implementing partners and follow up on these as part of ongoing capacity building.

- Support programme managers and other staff to ensure programmes and operations integrate safeguarding/PSEA measures into all activities.
- Ensure MAP facilitates awareness-raising campaigns with affected populations and local communities on the definition of safeguarding, the standards of conduct expected of staff and related personnel of MAP and our Partners, and the various mechanisms for raising allegations or concerns, including contact details.
- Support the establishment of community-level complaints mechanisms that facilitate reporting of safeguarding concerns by programme participants, service recipients, and other community members.

Reporting allegations of Safeguarding incidents

- Develop and maintain regional algorithms for reporting and investigating safeguarding concerns. Ensure the development of internal procedures for staff and other personnel to report safeguarding incidents safely and confidentiality.
- Receive reports of safeguarding allegations and related information and coordinate the response with MAP's Safeguarding Lead. Once a safeguarding allegation is received, the following steps should be taken:
 - a. To discuss immediately with MAP's Safeguarding Lead, CEO and Safeguarding Trustee to agree next steps.
 - b. If required to lead the preliminary investigation of the allegation, as per the regional algorithm, to determine if referral to the appropriate agency for a full, formal investigation is required and ensure the right support is offered to the survivor.
 - c. Ensure all other internal/external steps are taken, as per the regional and organisational algorithms; with ongoing support from MAP's Safeguarding Lead, CEO and Safeguarding Trustee.
- Report concerns or issues with safeguarding implementation to MAP's Safeguarding Lead.

Response to Safeguarding allegations

- Oversee the development of local support packages of survivors of SEA/safeguarding incidents, including service mapping and developing referral pathways for survivors.
- Once a complaint is received, coordinate MAP's response with MAP's Safeguarding Lead, including referral of SEA survivors for immediate, professional assistance and referral of the case for further investigations to an external organisation with expertise. The Safeguarding Focal Point is **not** responsible for conducting their own investigation.

Other responsibilities

- Coordinate MAP's safeguarding activities with relevant organisations, including inter-agency initiatives/mechanisms, as appropriate (such as the oPt PSEA network).
- Participate in periodic reviews of MAP's Safeguarding policies and procedures.
- Development of annual safeguarding reports detailing any safeguarding incidents, safeguarding training conducted for MAP staff and with Partners, and with collating progress on action plans with Partners including risk mitigation

measures. The Annual Safeguarding Report is to be completed and submitted to MAP's Safeguarding Lead before the end of January of the following year.

- Provide MAP's Safeguarding Lead with updates on any safeguarding development work ahead of each quarterly Programme Advisory Panel meeting.

Annexes to be read in conjunction with this Terms of Reference:

- MAP's Safeguarding Policy (including Safeguarding Code of Conduct)
- MAP's Whistleblowing Policy
- MAP's Dignity at Work Policy
- MAP's Data Protection Policy
- MAP's Equality, Diversity and Inclusion Policy