



Risk Management and Policies

Safe Place Policy

This forms part of the Fèisean nan Gàidheal policy portfolio

Date Approved	04/03/2022
Purpose	To lessen the risks to participants under the age of 18 and vulnerable adults, and to outline for staff and volunteers the procedure for responding to reports of abuse or neglect.
Summary	The policy outlines how Fèisean nan Gàidheal implements its arrangements for the protection of children and vulnerable adults attending or participating in its events. It also raises awareness of possible risks to children and vulnerable adults in respect of abuse or neglect and sets out the responsibilities of the PVG Officer - a necessary appointment within each member Fèis.

1. Purpose and Principles

Young people and vulnerable adults deserve to feel safe and secure while participating in activities organised, or funded, by Fèisean nan Gàidheal. Fèisean nan Gàidheal will take all reasonable measures to engage participants in caring, challenging, empowering, fun, inclusive, entertaining and inspiring experiences. We will strive to ensure the safety and well-being of all participants, members, organisers and tutors and protect them from physical, sexual and emotional abuse, or neglect. Fèisean nan Gàidheal's role extends to advising Fèisean how they can do likewise and, in certain cases, obliging them to do so through conditions of funding and membership.

The Safe Place policy deals, in particular, with prohibited behaviour so that a safe, inclusive and welcoming environment can be maintained in which everyone can participate in an atmosphere of respect and tolerance. It is supplementary and complementary to other policies and supporting documents Fèisean nan Gàidheal has in place to protect young people and vulnerable adults, namely our PVG Policy (which includes a Code of Good Behaviour and Good Practice), Whistleblowing Policy, Access Policy and our Equalities, Diversity & Inclusion Plan, all accessible on the organisation's website.

This Safe Place policy applies to activities organised in-person or online, or funded, by Fèisean nan Gàidheal. 'Volunteers' includes trustees, committee members, promoters or other unpaid helpers. 'Staff' includes Fèisean nan Gàidheal employees, any employee of a Fèis and freelance contractors including those engaged as tutors, leaders, supervisors or performers. 'Participants' means any young person or vulnerable adult taking part in activities and audience members attending events.

In committing to the participation in their activities by young people and vulnerable adults, volunteers and staff should recognise that special consideration must be applied to issues of recruitment, training, and review of their work.

The key principles of our Safe Place policy are as follow:

- Volunteers and staff are expected to take particular care in ensuring their behaviour is welcoming and inclusive.
- Disruptive or discriminatory behaviour, perpetrated by anyone, which prevents others participating or enjoying participation in activities is not acceptable and should be dealt with promptly.
- All volunteers, staff and participants are expected to demonstrate friendliness, civility and courtesy.
- Anyone asked to cease harassing or stop other unwelcome behaviour is expected to comply immediately. Harassment will be treated equally whether it takes place online or in-person.

2. Prohibited Behaviour

Harassment, discrimination, abuse or inappropriate behaviour of any kind will not be tolerated. This could include, but is not limited to:

- The consumption of alcohol while underage or the using of drugs at any time while in the care of, employed or contracted by, Fèisean nan Gàidheal or a Fèis.
- Discriminatory speech including offensive verbal comments related to age, gender, sexual orientation, gender identity or expression, disability, physical appearance, race, ethnicity, political affiliation or religion.
- Threatening behaviour including deliberate intimidation, stalking, unwelcome following, inappropriate photography/filming, unwelcome or violent physical contact, sustained disruption of events or any other verbal or physical conduct intended to threaten, coerce or intimidate.
- Unwelcome sexual attention or advances, suggestive comments or gestures, inappropriate requests for sexual favours or other verbal or physical conduct of a sexual nature.
- Persistent intrusion into the private lives of those who choose to participate in activities.

Those who engage in prohibited, or other inappropriate, behaviour should be in no doubt that, where it is reported, it will be acted upon. Some of the above behaviour could lead to criminal charges being brought against the perpetrator and everyone should be mindful of the potential consequences, especially the adverse effect such behaviour has on the victim.

3. Preventative Action

In the spirit of providing a welcoming and safe place for individuals and groups to work and participate in activities, Fèisean nan Gàidheal aims to prevent incidents of inappropriate or prohibited behaviour occurring. We will put in place a range of actions to raise awareness of what constitutes inappropriate and prohibited behaviour:

- We will ensure policies and procedures are fit for purpose and that volunteers, staff, participants and parents/ carers are aware of them.
- We will ensure, through conditions of funding, that Fèisean are clear they must adhere to Fèisean nan Gàidheal's policies, appoint a PVG Officer and have safeguarding measures in place.
- We will encourage all volunteers, staff and participants who witness inappropriate or prohibited behaviour to speak out at the time and defend the victim.
- We will make clear to all volunteers, staff and participants through communications, training and, where applicable, conditions of funding or contract, that unacceptable behaviour will always be challenged and the perpetrator dealt with.
- We will ensure, through contracts we issue, that staff are directed to relevant policies and the Code of Good Behaviour and Good Practice and that it is clear inappropriate behaviour could lead to instant termination of the contract and, possibly, further action. We will provide a model contract for Fèisean which includes the same.
- We will encourage all Fèisean to talk directly with volunteers, staff and participants about acceptable/ unacceptable behaviour in pre-Fèis briefing meetings so that everyone is clear how they should behave, the Fèis PVG Officer is identified and participants, in particular, are clear about the procedure for reporting incidents of harassment or abuse.

4. Corrective Action

If preventative measures fail and there is concern about the conduct of an individual, or a complaint received, action should be taken appropriate to the situation. Under no circumstances should any individual volunteer, staff member or participant attempt to deal with the problem alone.

If a young person or vulnerable adult is at risk, it is crucial that individuals share their concerns - no matter how small - with the PVG Officer (either within the Fèis or Fèisean nan Gàidheal) or another person, such as a supervisor, nominated as a responsible person in the absence of the PVG Officer.

Participants, volunteers and staff should be able to share, in confidence, with the PVG Officer or another responsible person, concerns they may have about a colleague's behaviour. Volunteers or staff should talk to their manager/organiser if they become aware of anything that makes them feel uncomfortable. Concerns about an inappropriate staff/volunteer relationship with young people or vulnerable adults must always be reported directly to the PVG Officer or other a responsible person nominated in their absence. Participants, volunteers and staff should never engage in malicious gossip about others.

While it may be difficult to express concerns about colleagues, it is important such concerns are communicated and that those sharing concerns have confidence they are safe to do so. Anonymity can generally be guaranteed to the individual raising the issue except where that individual is the victim of abuse or inappropriate behaviour and circumstances dictate the police or social work personnel may need to be involved.

5. Review

This policy shall be reviewed by the Board of Fèisean nan Gàidheal every three years as per our policy review schedule, or more often if necessary. Updates will be published on the organisation's website and, if applicable, members informed when revisions have been made.