

JAMYANG LONDON SAFEGUARDING POLICY

Contents

1.	INTRODUCTION.....	4
1.1.	JAMYANG LONDON DESCRIPTION.....	4
1.2.	OUR COMMITMENT TO SAFEGUARDING.....	4
1.3.	PROTECTING EVERYONE FROM ABUSE	4
1.4.	PEOPLE DESIGNATED FOR PROTECTING FROM ABUSE.....	4
2.	CONFIDENTIALITY	5
3.	PREVENTION.....	5
3.1.	UNDERSTANDING ABUSE.....	5
3.2.	HOW WE MIGHT RECOGNISE SIGNS OF ABUSE	5
3.3.	HOW MIGHT WE BECOME AWARE OF ABUSE	6
3.4.	CLEAR PROVISION OF PUBLIC INFORMATION	6
4.	OUR COMMITMENT TO SAFE PRACTICE	7
4.1.	JAMYANG LONDON IS COMMITTED TO:	7
4.2.	WORKING IN PARTNERSHIP WITH THE FPMT ORGANISATION.....	8
5.	PRACTICE GUIDANCE	8
5.1.	RECRUITMENT OF STAFF, TEACHERS AND VOLUNTEERS	8
5.2.	CODE OF BEHAVIOR FOR STAFF AND VOLUNTEERS	8
6.	RESPONDING TO ALLEGATIONS AND CONCERNS	9
6.1.	RECEIVING, RESPONDING AND REPORTING AN ALLEGATION OR CONCERN 10	
6.2.	ALLEGATIONS AGAINST TEAM MEMBERS	10
6.3.	PROCEDURES FLOW-CHARTS.....	11
7.	CARE AND SUPPORT	14
7.1.	GUIDING PRINCIPLES.....	14
8.	CONTACT INFORMATION.....	15
8.1.	JAMYANG LONDON CONTACT DETAILS	15
8.2.	LOCAL CONTACTS FOR REPORTING ABUSE IF NECESSARY	15
9.	ADDITIONAL INFORMATION AND RESOURCES	15
9.1.	FPMT POLICIES AND GUIDELINES.....	15
9.2.	RESOURCES	16
10.	RECORD OF CONCERN	17
11.	POLICY REVIEW	19

12.	APPENDICES.....	20
12.1.	Safe Recruiting Guideline	20
12.2.	Safe Space Policy.....	22
12.3.	Relating to Individuals with Mental Health Challenges - A Guideline	23
12.4.	Whistleblowing.....	26
12.5.	Training.....	27
12.6.	Safeguarding When Jamyang London Rents Out Its Premises.....	28
12.7.	Response to an Allegation of a Breach of the Ethical Policy.....	29

DATE OF BOARD APPROVAL: **18 November 2023**

DATE OF POLICY REVIEW: **18 November 2024**

1. INTRODUCTION

1.1. JAMYANG LONDON DESCRIPTION

Jamyang London is an FPMT Centre. We strive to fulfil the FPMT mission statement, and our aims are the promotion of wellbeing, meditation and public benefit, in accordance with Buddhist principles, and the preservation of the Buddhist Mahayana tradition. All in positions of authority and leadership in this Centre have signed an acknowledgement to abide by the FPMT Ethical Policy. “Jamyang London” includes all its outreach projects and satellite groups.

1.2. OUR COMMITMENT TO SAFEGUARDING

Jamyang London is committed to protecting people attending the Centre from harm and abuse. We will also ensure that all staff and volunteers work together, in line with this safeguarding policy, and act promptly when dealing with allegations or suspicions of abuse or inappropriate behaviour.

We acknowledge that children, young people and adults can be the victims of physical, sexual and psychological abuse, and neglect. We accept the UN Universal Declaration of Human Rights and the International Covenant of Human Rights, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. We also concur with the Convention on the Rights of the Child, which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse.

1.3. PROTECTING EVERYONE FROM ABUSE

Everyone associated with Jamyang London has a right to be protected from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse.

We use the term ‘safeguarding’ to describe everything we do to keep people safe, protect them from abuse, and act appropriately if anyone has been abused.

Safeguarding is Everybody’s Responsibility

We will work together to prevent and minimise the risk of harm or abuse. If we have concerns that someone is at risk of being abused our first duty is to the individual concerned.

Doing Nothing Is Not an Option

If we know or suspect that someone is at risk, we will respond and ensure our concerns are properly recorded. We will respond according to this policy and other Jamyang London procedures.

1.4. PEOPLE DESIGNATED FOR PROTECTING FROM ABUSE

Each such individual is known as a Safeguarding Officer.

- a) **Francesca Sanchez** – has oversight of Safeguarding, will support the Safeguarding Officers and oversee the development of Safeguarding policy and practice.
- b) **Ven Thubten Drolma** - The Director.
- c) **Jan Andresen** – Deputy Chair of the Board

IF YOU HAVE ANY CONCERNS –TELL THE SAFEGUARDING OFFICER

2. CONFIDENTIALITY

Jamyang London is committed to respecting the right to the confidentiality of everyone at the Centre.

However, sometimes it is necessary to share information to ensure a person's wellbeing. For example, there may be a statutory requirement; or sometimes practical information needs to be shared with the staff and volunteer team. Occasionally, sensitive information may be shared in this way. Such sharing will only include those who need to know and the information necessary to ensure that the person is protected from harm and abuse and that proper processes are followed if they have been harmed.

Staff, volunteers, and teachers who are informed that a person may have been abused or be at risk of abuse or are made aware of circumstances in which someone is at risk, may need to share sensitive information in order to take practical steps to protect the person at risk. These circumstances include:

- If the participant is under 18 and they disclose information that may indicate risk to themselves or other children or young people.
- If an adult discloses non-recent child abuse and it is known that children or young people are currently at risk from the abuser.
- If a staff member, teacher, or volunteer believes that a participant could cause danger to themselves or to others.
- If the participant gives information that indicates that a crime has been committed.
- If the participant gives information that indicates a possible terrorist threat.

Also, refer to 4.2, Working in Partnership with the FPMT Organisation.

In any of these cases, the person at risk will be informed that the disclosure they are making may not be kept confidential. If a decision has to be taken to break confidentiality, it will be done only after consultation with a Safeguarding Officer and the Director. Any disclosure will be shared internally or with external agencies as required while respecting the person's privacy as much as possible.

3. PREVENTION

3.1. UNDERSTANDING ABUSE

Abuse is a violation of an individual's human and civil rights by any other person or group of people.

Abuse may be single or repeated episodes. It is not only harming somebody; it also includes neglect of their basic needs or failure to protect them from harm.

3.2. HOW WE MIGHT RECOGNISE SIGNS OF ABUSE

This section considers the different types and patterns of abuse. This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a concern regarding abuse.

- Physical: including hitting, slapping, pushing, restraining or inappropriate uninvited

touching. Intimate partner violence. Self-harm.

- Psychological and emotional: including harassment, blaming, humiliation, threats of harm or abandonment, intimidation, verbal abuse and coercion.
- Financial: including the illegal or unauthorized use of a person's property, money or other valuables, pressure in connection with wills, property or inheritance. Modern slavery, and human trafficking.
- Sexual: such as forcing a person to take part in any sexual activity without his or her informed consent.
- Discriminatory: including racist or sexist remarks or comments based on a person's age, race, sex, national origin, disability, pregnancy, marital status, sexual orientation, medical condition or illness; and other forms of harassment, slurs or similar treatment. This also includes stopping someone from being involved in other cultural activity, services or support networks.
- Institutional: the collective failure of an organization to provide an appropriate and professional service, especially to vulnerable people. This includes a failure to ensure the necessary safeguards are in place to protect people and maintain good standards of care in accordance with individual needs, including training of staff, supervision and management, record keeping and liaising with other providers.
- Misuse of spiritual authority or power. This can take the form of all of the abuses listed above. Furthermore, all forms of abuse have the potential to cause damage to the individual's emergent spirituality. Holding a spiritual position or role is a trusted position, which involves differing power relationships and imbalances and these need to be recognised to respect the autonomy or rights of the individual. Jamyang trusts this individual teacher who is in a trusted position to uphold safe practice and the values of the organisation at all times.

Some abuse is *spiritual* abuse because of the context in which it occurs, or where it invokes status as a teacher or someone of higher spiritual authority or uses religious teachings to coerce or manipulate people into performing behaviours which meet the needs of the abuser rather than those of the individual concerned. In some cases, it may be well-intentioned rather than malicious but nevertheless is harmful, as it overrides the respect of an autonomous individual's right to make informed choices regarding their own lives and spiritual practices, for example, due to fear, shame, humiliation etc.

3.3. HOW MIGHT WE BECOME AWARE OF ABUSE

Concerns about or evidence of abuse can come to us through:

1. A direct disclosure by the person concerned.
2. A complaint or expression of concern by a staff member, a volunteer, another centre user, a carer or caregiver, a member of the public, or relative.
3. An observation of the behaviour of the person at risk.

3.4. CLEAR PROVISION OF PUBLIC INFORMATION

It is essential that staff, volunteers, and members of the public know who to contact if there are any concerns about abuse at Jamyang London. How to access relevant information, including the relevant policies and reporting procedures, together with who to contact must be available on a suitably placed notice board on the premises, and on the website.

4. OUR COMMITMENT TO SAFE PRACTICE

4.1. JAMYANG LONDON IS COMMITTED TO:

- Identifying abuse.
- Responding effectively to concerns and formal complaints.
- Creating a safe space for everyone at Jamyang London.
- Regularly monitoring and evaluating the effectiveness of our policies, procedures and practices for protecting people.
- Ensuring that our policies, procedures and practices stay up to date with good practice and the law in relation to protecting from harm and abuse.
- Training teachers, staff, trustees, volunteers in Safeguarding practices – see appendix 12.5.

The Centre will use various channels for informing everyone about who are the Safeguarding Officers and how to contact them, along with how to access this policy.

Staff, volunteers and facility users are entitled to respect, and protection from harm and abuse. We aim to give everyone a positive and rewarding experience.

We recognise that Dharma practice can be a powerful experience that brings underlying issues to the surface. In the event that participation in a course brings underlying issues to the surface, or reveals some form of mental or emotional disability, the teacher or Safeguarding Officers may recommend that the course participant seek suitable professional support. We aim to respond empathically in such circumstances.

It is important for staff and students to appreciate the limits of teachers' and volunteers' role, time, and skills. On some occasions we will suggest that suitable professional support is required.

Statutory and legal responsibilities:

There may be serious incidents, involving children under 18 or 'adults at risk of harm'. In these cases, there may be a statutory or legal requirement to inform the local authority and other relevant agencies to ensure protection from significant harm or abuse.

For example, an 'adult at risk' is defined as a person aged 18 years or over, who may require community care services because of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Since the Police, Crime, Sentencing and Courts Act 2022, the definition of 'position of trust' has been broadened to include "sport" and "religion".

'Position of trust' is a legal term defined in the Sexual Offences Act 2003. In section 22 it is explained as an adult "caring for, training, supervising or being in sole charge" of a child under the age of 18.

It is against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent. This means that even though the child may be over the age of consent (16), it is illegal to engage in sexual activity with any 16- or 17-year-old if the person holds a position of trust over them.

We recognise that everyone can be vulnerable at times, due to life events. Therefore, this policy covers not only children and adults at risk, but also everyone at Jamyang London. However, the response to any incident may vary according to the legal and statutory guidance for different groups.

4.2. WORKING IN PARTNERSHIP WITH THE FPMT ORGANISATION

- Jamyang London is committed to working in partnership with the FPMT organisation to develop good practice for preventing harm and abuse. This includes adopting FPMT Inc. policies and attending training provided by FPMT Inc. (International Office).
- Jamyang London will discuss their local context with the Centre Services director at FPMT Inc., in order to consider together where local jurisdiction and practices need to be taken into account and reflected in their policy.
- Jamyang London will inform the FPMT Inc. Centre Services director and their local FPMT regional and/or national coordinator of any allegations of concerns regarding abuse about a board member, director, spiritual program coordinator, and resident teacher, and action taken.
- Jamyang London will inform the FPMT Inc. Teacher Services director and their local FPMT regional and/or national coordinator of any allegations of concern regarding abuse about a registered or Tibetan teacher, and action taken.
- Jamyang London will inform the FPMT International Mahayana Institute (IMI) director of any allegations of concerns regarding abuse about a monk or nun, and action taken.
- Reporting to the relevant individual within the FPMT organization will not indicate failure on the part of Jamyang London but will rather indicate vigilance and a commitment to protecting from harm and abuse.

5. PRACTICE GUIDANCE

5.1. RECRUITMENT OF STAFF, TEACHERS AND VOLUNTEERS

Staff, teachers, introductory class leaders and volunteers at the Centre are in a position of trust. We recognise that it is important that vetting processes are in place to ensure that no one who may pose a risk of abuse or harm is put in such a position.

See more at appendix 12.1

5.2. CODE OF BEHAVIOR FOR STAFF AND VOLUNTEERS

You Must Avoid:

- Spending time alone or making unnecessary physical contact with children or adults at risk.
- Arranging private meetings (one-to-one) of students with teachers anywhere other than in Jamyang London's designated meeting areas or public places. For online one to one meetings between student and resident teacher, a third person will be present.
- Non-consensual touching in general.
- Meeting alone with children and adults at risk associated with Jamyang London, outside of the work environment.
- Investigative questioning after an allegation or concern has been raised. Instead, listen with an open mind in a caring manner. Then record the information and report it to the Safeguarding Officer, who will notify the appropriate authorities if required.

You Should Never (Even in Fun):

- Initiate or engage in sexually provocative conversations or activity.
- Allow the use of inappropriate language to go unchallenged.
- Do things of a personal nature for children or adult at risk that they can do themselves.
- Trivialise or exaggerate child or adult abuse issues.
- Allow any allegations made by a child or adults, students, staff, or volunteers, to go without being reported and addressed.
- Make promises to keep any disclosure confidential from relevant authorities.

Regarding All Your Relationships Within and Around Jamyang London:

- Respect everyone's right to privacy subject to appropriate and proportionate safeguarding considerations.
- Help create a culture in which everyone feels able to report experiences of harmful, uncomfortable attitudes or behaviour.
- Act with discretion with regards to your personal relationships. Ensure your personal relationships do not undermine harmony or impact on your capacity for impartiality.
- Be aware that conflicts of interest can arise, leading to misunderstandings. This can happen particularly where there is an imbalance of power or close personal relationship. Where such potential situations arise, one should discuss this with the Director, and possibly the team as relevant.
- Be aware of the procedures for reporting concerns or incidents and how to contact the Safeguarding Officer.
- Should you find yourself the subject of inappropriate affection or attention from anyone, it is essential to record this, including the date and time, and report it to the Safeguarding Officer.
- Report any concerns to one of the Safeguarding Officers. If they are not available, tell another responsible person at the Jamyang London.
- Maintain appropriate boundaries with others at Jamyang London. Be aware of the scope of your role and when necessary, pass information to those whose role it is to deal with specific matters. Be careful not to give personal or Dharma advice to individuals that goes beyond your expertise or role. Respond with empathy and kindness, rather than being drawn into giving expert advice. If there are concerns that a person might need further help this should be reported to the Safeguarding Officer or Director.
- Study, sign and abide by the FPMT/Jamyang London Safeguarding policy and the FPMT Ethical Policy.

Also see Appendix 12.2 - Safe Space Policy

6. RESPONDING TO ALLEGATIONS AND CONCERNS

Under no circumstances should a team member (paid or volunteer) carry out their own investigation into an allegation or suspicion of abuse.

Suspicious must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.

6.1. RECEIVING, RESPONDING AND REPORTING AN ALLEGATION OR CONCERN

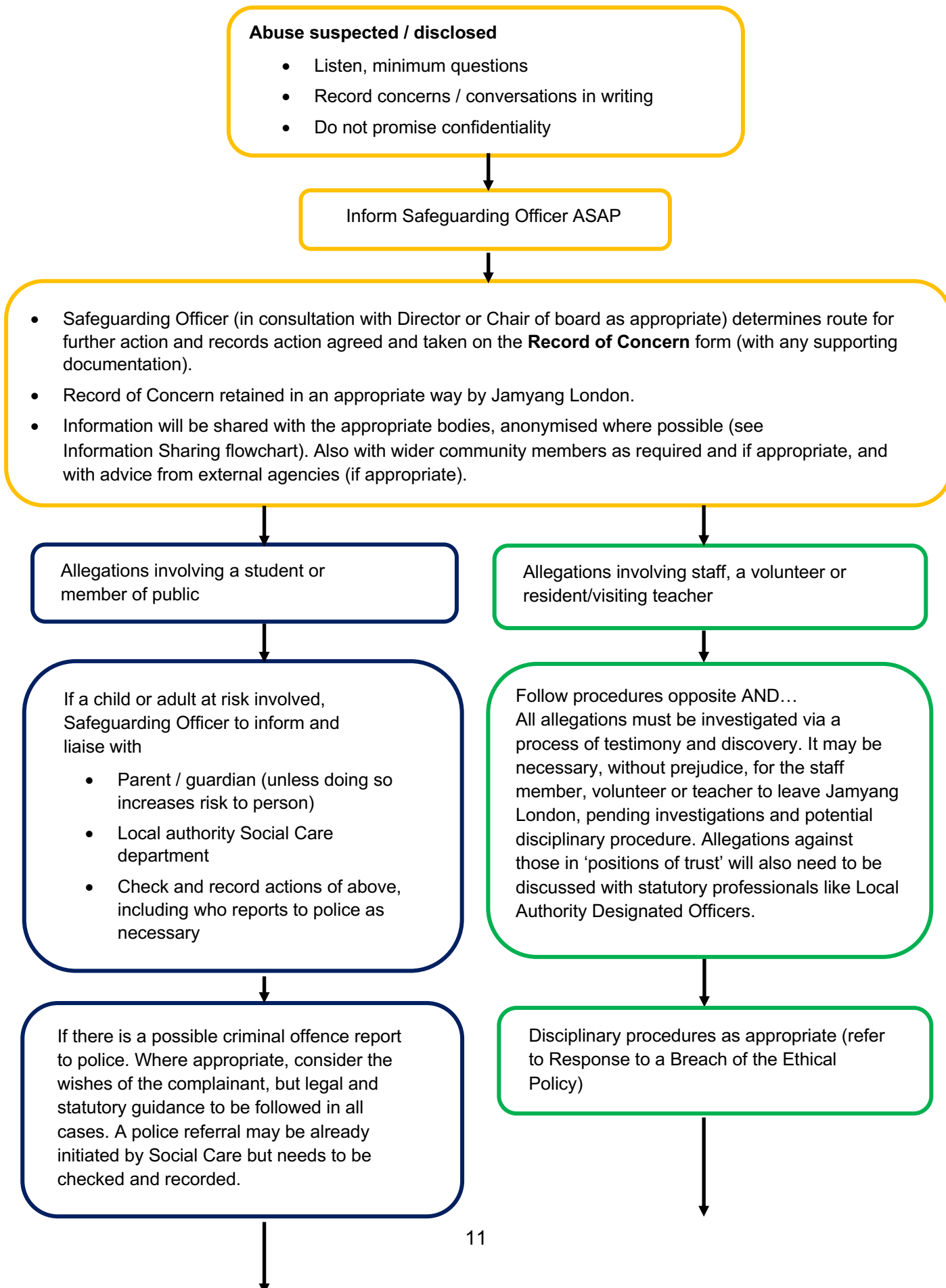
- Never promise unconditional confidentiality.
- Explain that if the person expressing the concern may have been abused or be at risk of abuse you may need to tell someone. Explain the role of the Safeguarding Officer.
- Listen very carefully.
- Only ask questions to clarify your understanding.
- Do not ask searching questions – this could compromise a future investigation.
- Offer reassurance and thank the person for telling you.
- Tell the person you will try to get them the help they need.
- Explain what you will do, e.g., tell the Safeguarding Officer.

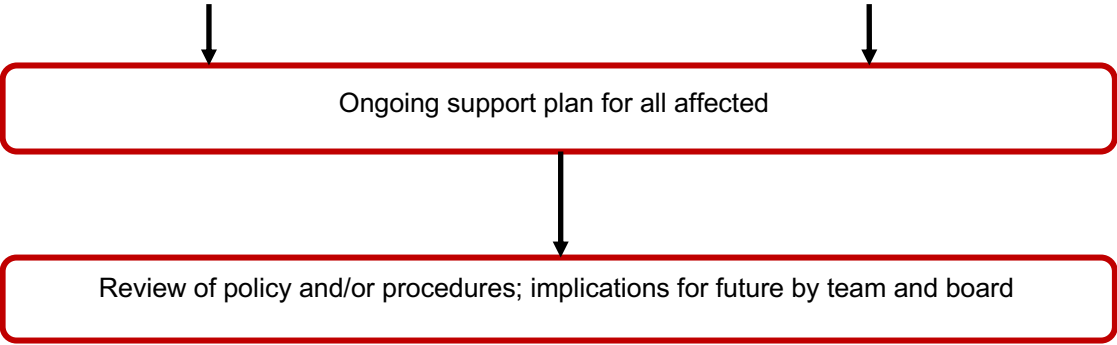
6.2. ALLEGATIONS AGAINST TEAM MEMBERS

If an allegation is made against a team member (whether a volunteer or paid member of staff) whilst following the procedure outlined above, this must be reported immediately to the Safeguarding Officer (unless they are the subject of the allegation) and the Director (unless they are the subject of the allegation) to ensure that the volunteer or paid staff member is subject to any additional appropriate policies and procedures.

All allegations or concerns regarding the Director, Spiritual Program Coordinator, and resident and/or registered teacher/s must also be reported to the Centre Services or Teacher Services director as appropriate at International Office (as explained in 4.2 above), and to the local FPMT regional and/or national coordinator.

6.3. PROCEDURES FLOW-CHARTS





INFORMATION SHARING DURING / FOLLOWING AN INVESTIGATION

Safeguarding Officer shares information as soon as possible in conjunction with Director

- If it is the Director who is the subject of the allegation, this responsibility passes to the Chair of Board.
- Action is taken to fulfil legal and statutory requirements and to protect anyone who may be at risk of being harmed.

Board

- Anonymised information given to enable the board to fulfil their safeguarding responsibilities as required by law.
- Board must also manage and minimize the risk of further incidents happening as far as this is reasonably possible, by supporting any necessary changes to policies, procedures and work practices.
- Inform Insurance company if required.

Director, FPMT regional/national coordinator, and Center Services director if the chair of the board is the subject of the allegation.

Chair of the board, FPMT regional/ national coordinator, and IOF (see 4.2) if the Director, SPC, a board member or teacher is the subject of the allegation

Charities Commission informed in the following circumstances:

- If beneficiaries of the centre (adults or children) have been, or alleged to have been, abused or mistreated while under the care of the charity, or by someone connected with the charity, for example a trustee, staff member or volunteer.
- If there has been an incident where someone has been abused or mistreated (alleged or actual) and this is connected with the activities of the charity.
- If there has been a breach of procedures or policies at the charity which has put beneficiaries at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or adults.
- Harm to your charity's work or reputation

IMI Director if an allegation is made about an ordained Sangha member

Consider what is important and appropriate to share with the wider Centre/ FPMT community.

7. CARE AND SUPPORT

Jamyang London is committed to offering care and support, working with statutory agencies as appropriate, to all those who have been affected by abuse who have contact with or are part of the Jamyang London. This may include the alleged victim and the alleged perpetrator. Support may be needed for the wider community also.

7.1. GUIDING PRINCIPLES

- Prioritise the wellbeing and safety of all who reside, visit or come into contact with Jamyang London.
- Never promise to keep anything reported confidential. It should be explained at the outset that any disclosure will be shared internally or with external agencies as required so as to keep the individual or anyone affected, safe. However, the person's privacy will be respected as much as possible.
- For the purposes of recording, it is important to listen. Questions should be kept to the minimum necessary to understand what is being alleged, and leading questions avoided. (The use of leading questions can cause problems for any subsequent investigation and court proceedings.)
- All those involved should take great care in reaching conclusions and making decisions. Regarding sharing information within the Centre, confidentiality, and privacy of all the individuals concerned should be protected as appropriate and feasible. When the process is complete, consideration should be given to what is appropriately shared with the wider Jamyang London community with a focus on learning and practice development.
- Whatever action you may have to take, and even if the authorities are involved, don't lose sight of the person or persons at the Centre of the concern. Ensure that there is someone to whom they can turn for support after any allegation or investigation. If they give further information, then go through the process of listening and recording as already described.
- When dealing with adults at risk, their wishes, feelings and mental capacity must be taken into account and people should be supported to make their own decisions and encouraged to give informed consent when possible and safety considerations permit.
- Be aware that although the particular individual that has disclosed abuse may now be safe and protected, it is important to think about the potential risk to others from the alleged perpetrator. If the matter is serious, inform the appropriate agencies as required, and also pass information to those who may need be aware in order to protect others.
- It is important to think carefully how best to maximize everyone's rights to privacy as much as is feasible. There will be people with whom information needs to be shared. In many cases this could be anonymised, and the person's name only be shared with those where this is essential. Consider carefully what is shared by email, particularly bearing in mind data protection considerations, and again anonymise where feasible, or encrypt and password protect documents with names of alleged perpetrators and those who have been harmed.
- The Jamyang London needs to make clear decisions to promote the wellbeing and safety of all they come into contact with. However, it is important to maintain equanimity towards all those involved in any allegation and at the same time ensure robust safeguarding procedures. Respect and compassion need to be shown to both the person harmed and the alleged perpetrator, and where appropriate and feasible, care and support given.

8. CONTACT INFORMATION

8.1. JAMYANG LONDON CONTACT DETAILS

- Executive Director (Safeguarding Officer)
- Ven Thubten Drolma, 020 7820 8787 director@jamyang.co.uk

- Safeguarding Officer (Safeguarding Officer)
- Francesca Sanchez, 07983 016583, safeguardingofficer@jamyang.co.uk

- Deputy Board Chair
- Jan Andresen, 07926 157068, janandresen@jamyang.co.uk

- FPMT mandated contacts:
 - UK National Coordinator: Ven. Barbara Shannon, fpmtukcoordinator@gmail.com
 - UK National Safeguarding Officer, Shan Tate, shan.tate@btinternet.com
 - FPMT Centre Services director, Francois Lecointre, francois@fpmt.org
 - FPMT Teacher Services director, Francois Lecointre, francois@fpmt.org
 - IMI director, Venerable Losang Tendar, director@imisangha.org

8.2. LOCAL CONTACTS FOR REPORTING ABUSE IF NECESSARY

Safeguarding children

If you have concerns about the safety or welfare of a child, speak to someone immediately. If you are ever concerned that a child is in immediate danger, please call the police or an ambulance on 999.

Lambeth Safeguarding website:

<https://www.lambethsafeguarding.org.uk/>

<https://www.lambethsaferchildren.org.uk/>

If you are worried about a child, report your concern to 020 7926 3344 or

helpandprotection@lambeth.gov.uk

Alternatively, regarding all the above concerns, call the NSPCC 24-hour child protection helpline on 0808 800 5000.

Safeguarding adults

In an emergency contact the police, telephone 999.

If the person is not in immediate danger, contact the police, telephone 101.

Lambeth Safeguarding website:

<https://www.lambethsafeguarding.org.uk/>

<https://lambethsab.org.uk/>

To report a safeguarding concern, fill in an Adult Safeguarding Concern Form online:

<https://forms.lambeth.gov.uk/ADULTSAFEGUARDINGCONCERN/launch>

9. ADDITIONAL INFORMATION AND RESOURCES

9.1. FPMT POLICIES AND GUIDELINES

Ensure **FPMT Policies and guidelines** are available, understood and followed.

9.2. RESOURCES

- **Thirtyone:eight** <https://thirtyoneeight.org/>

Thirtyone:eight is a UK based safeguarding charity, which is consulted by churches and other organisations. They also advise other faith groups and a wide variety of statutory and third sector organisations with safeguarding concerns. They operate a 9am-5pm advice helpline and also offer training and other resources.

- **An Olive Branch** www.an-olive-branch.org

A USA based organization formed in 2011 as a project of the Zen Centre of Pittsburgh. Growing out of the need for greater understanding and reduction of ethical misconduct on the part of religious leaders, they provide services to organisations in conflict after a teacher has been accused of misconduct. In the USA they promote understanding and healing and work to strengthen organisations' boards and policies to reduce the likelihood of future misconduct. They also have some information and resources available on their website.

- **NSPCC**, Weston House, 42 Curtain Road, London EC2A 3NH

Contact the NSPCC helpline if you're worried about a child, even if you're unsure, contact our professional counsellors for help, advice and support.

Call, 0808 800 5000, or email help@nspcc.org.uk.

- Childline (for under 18s to call). Free and confidential: 0800 1111
- The Disclosure and Barring Service is to help prevent unsuitable people from working with children and vulnerable adults. Referrals are made to the DBS when an employer or an organisation such as a regulatory body, has concerns that a person has caused harm or poses a future risk of harm to children or vulnerable adults.
<https://www.gov.uk/guidance/barring-referrals>
- Charity Commission <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

10. RECORD OF CONCERN

Strictly Private and Confidential

Name of the subject of the report	
Contact information	
Person initiating concern	
Concern or incident (information received)	
Date, time and location	
Any relevant additional information	

<p>Action taken immediately (to be completed by Safeguarding Officer to whom the report was made)</p>	
<p>Follow-up plan (by both safeguarding officers including the Director)</p> <p>State clearly if other agencies and FPMT individuals were required to be contacted and when this was done</p>	
<p>Name: [print]</p> <p>Signature:</p> <p>Date:</p>	

One copy to be retained confidentially by Jamyang London: duration according to legal advice.
 Anonymised copy created by removing identifying details sent to chair of Jamyang London board to confidentially share with other board members.

11. POLICY REVIEW

We are committed to reviewing our policy and good practice annually, or when there are significant changes in the organisation or to its staff/volunteers - whichever occurs sooner. This procedure was last reviewed on:

..... (Date)

Signed:(Name)
[Chair of Jamyang London board]

Date:

12. APPENDICES

12.1. Safe Recruiting Guideline

Leaders, team members, teachers and trustees at Jamyang London are in a position of trust. We recognise it is important that vetting processes are followed when appointing individuals to positions of trust, ensuring that no one who may pose a risk of abuse is put in such a position.

Consequently, our staff recruitment process is as follows:

Recruiting and appointing

- We will prepare a role description for all roles, which will help us decide the level of risk involved and what steps to take when recruiting.
- Jamyang will request a CV or a completed application from applicants.
- We will get to know people before we bring them into the team (team members, volunteers and trustees). We will start with an interview or informal chat so we can form our own opinions, then source two references from others so we can check the opinions that we formed. Interviews for paid roles are conducted by a panel and each candidate is assessed against the role description provided.
- We will check the criminal history of a potential employee or volunteer (disclosure and barring checks). Most Jamyang roles will only be eligible for a Basic DBS Check. We will carry out a basic DBS check for the Senior Leadership Team: Director, Operations Manager, and Spiritual Programme Coordinator and senior teachers.
- For trustees, we also need to make sure that trustees are not disqualified by law from acting as a charity trustee. We will ask all new trustees to check that they are eligible and sign a declaration form. See below for further information.
- For paid roles, successful applicants are provided with a letter of appointment and a contract. For volunteering opportunities, successful applicants are provided with a volunteer agreement as part of their induction.

Induction

- We have a clear and written induction and training process at which successful applicants are required to sign and abide by the FPMT Ethical Policy and Jamyang London Safeguarding policy and training, alongside all other policies for the Centre.
- In addition, trustees, Executive Director and Spiritual Programme Coordinator are required to undertake the FPMT Protection from Abuse training.
- Furthermore, during their period of employment, all staff, whether in paid employment or working as volunteers, are provided with regular supervision and support from their team leaders, including an annual review, as well as regular safeguarding training

All personal records are kept securely.

Check prospective trustees are eligible

<https://www.gov.uk/government/publications/finding-new-trustees-cc30/finding-new-trustees>

You must be at least 18 years old to be a charity trustee (16 if your charity is a company or charitable incorporated organisation (CIO)).

Some people are disqualified by law from acting as charity trustees or holding senior management positions within a charity unless authorised to do so by a waiver from the Charity Commission.

This includes anyone who has an unspent conviction for:

- an offence involving dishonesty or deception
- specified terrorism offences or being a designated person (under specific anti-terrorist legislation)
- a specified money laundering offence
- contravening a Charity Commission Order or Direction
- offences of misconduct in public office, perjury, or perverting the course of justice

Automatic disqualification rules also apply to people who are:

- currently declared bankrupt (or subject to bankruptcy restrictions or an interim order) or have an individual voluntary agreement (IVA) with creditors
- on the sex offenders' register
- [disqualified from being a company director](#)
- removed from a trustee role by either the Commission or the High Court due to misconduct and/ or mismanagement

For more information, see our [Automatic disqualification guidance for charities](#).

It is normally an offence to act as a trustee while disqualified unless the commission has given a waiver. Special provisions apply to charitable companies. Find out more about [disqualifications and waivers of disqualification in the commission's staff guidance](#).

You can ask potential trustees to sign a [declaration form](#) to confirm that all necessary checks have been made and they can legally accept the appointment.

12.2. Safe Space Policy

A safe space policy is all about creating an open and welcoming environment within our centre so that all our members feel able to participate. With this in mind we ask all students, staff, volunteers and visitors to adhere to this policy, and it is mandatory that all official Jamyang activity is carried out in accordance with this policy. This policy also extends to social media and online resources (Facebook, Twitter, Website etc).

Jamyang is committed to operating as a space which is inclusive and supportive in which no forms of discrimination are tolerated. Racism, homophobia, biphobia, sexism, transphobia, disablism or prejudice based on age, physical appearance, body size, ethnicity, nationality, class, gender, gender presentation, language ability, immigration status or religious affiliation is unacceptable and will be challenged.

Safe Space Guidelines

- Be aware of the connotations of your language. Many common expressions use discriminatory language so think before speaking.
- Be aware of the language you use in discussion and how you relate to others.
- Be aware that your experiences are not necessarily the same as everybody else in the room.
- Be aware of any position and privileges you may bring regarding for example your race, your class, your educational status, your gender identity, your ability or your age. Try not to make generalising statements.
- Try to use accessible language, speaking slowly and clearly, and use uncomplicated language, avoid any acronyms and in-jokes.
- Do not make assumptions about anyone's identity and consider the ways that people from global majority groups may be impacted in different ways by the issues you discuss.
- Be aware of gender, pronouns, sexual preference, abilities, ethnic identity, survivor status, or life experiences. A pronoun is how you refer to someone, for example using she or they. Please ask people what their pronouns are if you are meeting them for the first time. Use their correct pronouns, even if the words are unfamiliar to you. If you make a mistake and refer to someone with the wrong pronoun, apologise and move on.
- Do not be derogatory to anyone about these things. Be prepared to challenge hateful, discriminatory, or oppressive language. If you are challenged, do not become defensive, but listen and think and learn.
- Respect each other's physical and emotional boundaries, always get explicit verbal consent before touching someone or crossing boundaries. If a discussion becomes personal, we trust that participants will keep what is said inside the room and behave with kindness and consideration when responding.
- Participants should be considerate of how much they are speaking to avoid dominating the conversation and avoid interrupting other people who are sharing their views. We encourage participants to listen to views which are different from their own but feel confident in expressing opposition in a non-confrontational way.

Should you feel that the policy has been breached and appropriate action was not taken at the time, speak to the event facilitator or Director. All concerns will be taken seriously and dealt with in accordance with our grievance procedure.

12.3. Relating to Individuals with Mental Health Challenges - A Guideline

As students of Tibetan Buddhism, it is our practice to work with our minds, to overcome delusions and attain enlightenment for the benefit of all. The central orientation of FPMT Centres, projects, and services is to offer service to others, and the main Dharma service is to help others to work with their mind, by understanding and engaging with the Buddha's teachings. We can best assist those whose minds are able to make some sense of the teachings, minds that can be trained in a beneficial way.

It is important and helpful to acknowledge that some people who express a wish to work with their minds may actually not be able to do that at a particular time due to mental health challenges. Lama Yeshe used to say, "The Dharma is for healthy people, dear."

How Might Mental Health Issues Be Noticed:

- A person may be known to have mental health issues and may disclose that they are already receiving medical help in the form of medication and / or counselling or psychiatric help.
- A person may not disclose that they have mental health issues, but their behaviour and conversation may be giving cause for concern.

Some things to look for which may indicate that a person is experiencing mental health issues which they haven't disclosed:

- A pattern over time of extreme highs and lows which are often accompanied by insomnia, memory impairment, and sharp changes in mood.
- Poor memory, poor concentration, too much or too little sleep, changes in appetite, failure to meet commitments, lateness, absences, moodiness, angry outbursts.
- The above combined with bizarre or eccentric appearance, lack of hygiene, a high level of suspiciousness, rapid thoughts and speech that are not necessarily connected or directed.
- Making strong connections then turning against the person they were idealizing before; a complete absorption with the self; a strong and unrelenting pattern of passive-aggressiveness (everything's fine but there are lots of side comments or behind the back remarks).
- A pronounced pattern of the person not remembering chunks of time, losing time, even calling themselves different names at different times; a pronounced startle response.
- People being under the influence of intoxicants at inappropriate times. People taking intoxicating substances against the Centre's expressed rules and values may be problematic anyway. It is usually futile to speak with a person who is influenced by substances - best not to allow them into the Centre until they are sober again.

How to Respond to Someone Presenting with Mental Health Issues

In keeping with the Jamyang Safeguarding policy, affiliates should have a clear policy in place so that if staff, including volunteers, feel that someone at the centre presents in a way which suggests they might have a mental health challenge, they know not to engage with the individual regarding this, and to bring their concern to the Director, and/or to the Safeguarding Officer.

The people in those roles are the only ones who should reach out to try to help the person presenting with mental health issues. They should do that by signposting suitable professional

help, ideally supporting the person to reach out for that professional help, and by keeping clear records of such interactions.

An exception could be that if the Director or Safeguarding Officer is not on site and the person is in crisis, which means that they are clearly a danger to themselves or others, or they are not operating in the same conventional reality as you and others at the Centre; whoever is managing the centre at that time should try to get them to a hospital. If this occurs, the Director, and/or Safeguarding Officer should be informed as soon as possible, and ensure that a clear Record of Concern is filled in and kept safely.

The Director and Safeguarding Officer need to know the specific local resources available for providing suitable help for someone experiencing mental health issues. These resources will include hospitals, wellness checks, Social Services, and the police (if appropriate). It may also be helpful to have a list of suggested therapists.

It is helpful for staff at Jamyang London understand why it is so essential that only the Director and/or the Safeguarding Officer should liaise with an individual presenting with mental health challenges. Reasons include that people with mental health issues can often speak 'confidentially' to a number of people and tell each one part of their story. As a result, a number of people can be drawn into giving support without anyone having the complete picture, and therefore the director will not know the extent of the problem. Someone with mental health challenges may state that a person is the only one who they can talk to and create an unhealthy relationship of co-dependency. People can be drawn into offering support that is beyond the limits of their own competency. This is not helpful for them or the person they are trying to help. If the 'helper' reaches the point where they feel they can no longer help the person, that person may feel rejected, become angry and accusatory.

As described in the overview of the Safeguarding Policy, although each individual is committed to fulfilling FPMT policy, and doing their best to interact with kindness and compassion, there will be limitations of time, resources, and skills. We cannot and will not operate beyond the limits of our own competency. Safeguarding Officers can walk alongside, within available resources, and can signpost, but not offer, therapeutic help.

It may be helpful to reflect that a Centre exists to serve many people, and if one or two individuals take up a lot of the resources of the Centre staff, then the staff may not be able to benefit others who could benefit more.

Allegations of Abuse by Someone with Mental Health Issues

It is important to be aware that people with mental health issues are particularly vulnerable to abuse and exploitation. This can often, though not exclusively, be in the area of sexual or financial abuse. They are also vulnerable to radicalisation. The response to any disclosure or allegation of concern (e.g., *name* has formed a special relationship with me / has touched me sexually, is taking money from me) should be to follow the affiliate's processes for receiving, recording and reporting concerns.

Where allegations relate outside the normal, for example to dreams about a person abusing them, the Safeguarding Officer should encourage the complainant to seek medical/therapeutic help. This may reflect a psychiatric illness or could indicate past abuse. It is not appropriate to seek to counsel them, but support can be offered such as accompanying them to their doctor and finding a trusted person who can do so.

In some countries, if there are serious concerns about a person's mental health and they refuse help, the concerns can be reported to their doctor (if known), and/or to adult social services. If the person appears to pose a risk of harm to themselves or others the police can be informed.

All such incidents should be carefully documented.

Concerns about False Allegations

We understand that faith-based organisations often attract individuals who are suffering, including those suffering with mental health issues. It is important that those who serve in leadership roles within the FPMT organization know how to safeguard themselves and the organisation against false allegations which may be triggered by a mental health issue.

This means working together to create healthy cultures where there is openness and transparency, as in a community with such a healthy culture, false allegations will not be sustainable.

Hallmarks of a healthy culture include:

- All leaders and teachers following and applying the FPMT's code of conduct, the FPMT Ethical Policy, in their online as well as face-to-face interactions.
- Keeping everything transparent.
- Frameworks of accountability.
- Training regarding healthy boundaries in relationships.
- Appropriate support and supervision.
- Disclosure of any developing romantic attachments or concerns about a student or follower becoming dependent.
- A willingness to confront any misuse of power.

12.4. Whistleblowing

Whistle-blower Protection: If an individual or group believes that a practice or activity within Jamyang London is illegal and/or against this Safeguarding Policy, and brings their concern to the relevant management, that individual or group shall be protected from retaliation.

12.5. Training

Jamyang London is committed to training its board members, staff, volunteers and facilitators in safeguarding and will:

- Explain the safeguarding policy as part of its induction for all board members, staff and volunteers.
- Provide training, especially when significant changes have been made in the organisation or when a significant time has passed
- Provide ongoing training to all staff, volunteers and facilitators at regular intervals

Protecting from Abuse (safeguarding) training course

FPMT Inc. requires that all in a position of authority within FPMT Inc. and its affiliates complete our Protecting from Abuse training course within three months of beginning their role and take the refresher training if they are still holding that role after three years. 'Position of authority' within Jamyang defined as Trustees; Resident Teacher; ED; SPC and Operations Manager.

With this training, FPMT Inc. aims to ensure that each person in a position of authority in the FPMT organization understands that actively protecting from abuse is essential, takes it seriously, and is confident in taking appropriate steps.

FPMT Inc. provides the Protecting from Abuse Training as a course on the FPMT Online Learning Centre. This Ethics and Protecting from Abuse section is the preliminary reading. The main part of the course is a video training presentation, lasting about 1 hour and twenty minutes. This training presentation comprises information and reflection regarding what is abuse, who is affected, why we have a policy about abuse, how to respond to an allegation of abuse, and how attend to all who expect safety in our communities. Further materials to encourage deeper understanding and interaction with the topic are provided following completion of the training presentation video.

Jamyang London will use the training course as part of its local staff and volunteer training.

The course is in English, and is being translated into Spanish, French, Italian, Chinese and Tibetan.

Further Training

The Designated Protection Person/s at FPMT Inc. may generate further training on this topic.

Additionally, FPMT regional and national coordinators may generate further locally specific or requested training and discuss and deepen awareness of this topic at national and regional meetings.

There is also an expectation that the reporting of concerns regarding abuse (safeguarding concerns) and incidents to regional, national coordinators and FPMT Inc. will help FPMT Inc. in overseeing the management of incidents and gaining an understanding of further training and development needs.

12.6. Safeguarding When Jamyang London Rents Out Its Premises

Whilst there is joint responsibility on Jamyang London and those renting/using the Jamyang London's premises for the safeguarding of children and adults taking part in activities on the Jamyang London's premises, it is the Jamyang London board members who bear ultimate responsibility for safeguarding for all activities on the premises.

Therefore, Jamyang London must provide the organisation or individual using our premises with its Safeguarding policy and require them to sign an agreement which says they have read that policy and agree to abide by it.

Before accepting a booking - ask if they are working with children or vulnerable adults? If so, ask to see their safeguarding policy.

Further guidelines:

Be public about your expectations - share a safeguarding statement in addition to our safeguarding policy so hirers know what to expect. That will help stop abusers from renting our space.

Not all groups will need to provide these:

Their safeguarding policy won't be needed for private parties etc.

Insurance and risk assessment - not for general meetings or things which will fall under our own risk assessment and insurance for that space. e.g., If something seems risky like bringing fire into the building, then ask to see their insurance and risk assessment.

Our terms and conditions to which they agree

Needs to include responsibility for them to let us know of repairs needed etc. And fire evacuation instructions have been read and understood.

12.7. Response to an Allegation of a Breach of the Ethical Policy

It is FPMT policy that any complaint of alleged ethical misconduct shall be investigated thoroughly and promptly by the accused person's line manager or governing body, and that to the extent possible the individual(s) investigating shall keep the information confidential, consistent with their obligation to investigate promptly and thoroughly. Allegations against those in positions of trust should also seek advice, if appropriate, from external agencies such as the Local Authority Designated Officer.

If the allegation is of a concern regarding abuse, the procedure described in the Protecting from Abuse policy must be followed.

An allegation of a breach of Ethical Policy by an FPMT regional or national coordinator should be brought to the FPMT Centre Services director.

The investigator/s may determine that the person accused of misconduct should take leave from their position while the investigation is ongoing, without prejudice. Leave does not mean that the accused is guilty. Care and support should be extended equally to the accused and the accuser. If the accused is paid staff, pay would continue during the period of enforced leave. If the accused is a registered teacher, their leave would mean suspending any teaching engagement at any FPMT affiliate during the leave period.

If the investigation determines that ethical misconduct has occurred, it is FPMT policy that every individual who has breached the ethical policy receive an explanation of why their conduct is unethical and be given the opportunity to explain their behaviour. If that individual agrees to change their conduct in line with FPMT Ethical Policy, they should be given the opportunity to continue offering service unless the safety of others is at risk. The investigating body may require mediation, counselling, training, and/or disciplinary measures prior to, or alongside, further involvement of the offender in FPMT activities.

If the misconduct was severe, and the line manager or governing body considers it too detrimental to allow the individual to continue, they may dismiss that individual from their position or bar him or her from the centre, service, or project.

Also if the individual does not agree to the measures imposed, or is considered to have breached Ethical Policy a second time, the line manager or governing body may dismiss that individual from their position or bar him or her from the centre, service, or project.

The term 'process of testimony and discovery' may be used if preferred, instead of 'investigation'.