

# RUBIKON Centre

# SAFEGUARDING POLICY

# Principles

# to Protect Clients



**RUBIKON Centre, z.ú.**  
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Place and date of document approval: Prague, 30. 4. 2021

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# 1. Introduction

## **RUBIKON Centre vision**

The justice and not-for-profit sectors cooperate and create conditions to return reformed and motivated people from jail back to a society that is not afraid to give them a second chance.

RUBIKON Centre helps people overcome their criminal past. We support them on their path back to society – finding and keeping a job, resolving debt, and being responsible to themselves, their family and those around them. We provide professional services and support inside and outside of prisons. Creating a safe and supportive environment is crucial to us. The protection of our clients is the responsibility of the entire organisation and all its employees. RUBIKON Centre strictly rejects any abuse or violence against its clients, be it from its employees or volunteers or its partners.

## **Our activities are based on these values (see our Ethical Code in the appendix):**

1. Equal treatment and tolerance for differences
2. Respect and openness
3. Development of potential and a safe environment
4. Renewing disturbed relationships
5. Professionalism
6. We learn from the experience of people with a criminal history
7. Responsibility and transparency
8. Partner collaboration
9. Zero tolerance to violence

## **Every person has the right to live with dignity in a space that provides protection from any violence or abuse. To create such a space, we have adopted the following measures:**

- We provide a safe environment, where our clients can develop their potential
- We support our clients in assuming responsibility for themselves and others around them, including the ability to evaluate possible risks and prevent them
- We strive to protect clients and we are sensitive to any breach
- We provide training to all our employees so that they respect the principles of safeguarding their clients and know how to act when these principles are breached. Employees who work directly with clients have been trained to recognize signs that the client is dealing with abuse or violence and to know how to proceed in these cases
- We have a system that makes it possible for all clients and employees to submit a complaint if the principles of work with clients are violated
- We inform clients about their rights and the principles of cooperation with RUBIKON Centre, including the possibility to complain about a breach
- In case of violation or non-observance of client safeguarding principles, we immediately seek to correct the situation, also possibly using disciplinary action
- We ensure that all our employees have a safe and supportive environment

- We regularly evaluate compliance with our principles of client protection
- Where needed, we collaborate with other institutions and organisations to ensure the protection or other needs of our clients

## 2. The Scope of Safeguarding

Our rules apply to all employees, mentors and volunteers of RUBIKON Centre. Employees undergo an introductory and continuous training in this area (see chapters 5 and 6). RUBIKON Centre also requires that its partners and donors respect these principles and values. Non-compliance may be a reason to end our collaboration. Safeguarding policy is an integral part of working contracts. It is an internal policy that is signed by all employees.

## 3. Legislative Framework

**RUBIKON Centre adheres to relevant regulations and laws in the Czech Republic and stemming from international treaties. This mainly includes:**

- The Constitution of the Czech Republic including the Charter of Fundamental Rights and Basic Freedoms
- The Anti-Discrimination Act
- The Act on the Rights of Members of National Minorities
- The Criminal Code
- The Act on the Service of a Term of Imprisonment and on Detention
- The Labour Code and the Employment Act
- We also adhere to other international treaties:
- The UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
- UN Basic Principles for the Treatment of Prisoners
- European Prison Rules of the Council of Europe
- Convention for the Protection of Human Rights and Fundamental Freedoms
- International Covenant on Civil and Political Rights

**We also base our activities on the main policies and strategies that the Czech Republic employes in this area, which are closely related to the activities of RUBIKON Centre.**

- Prison Service Concept Until 2025 (Adopted by the Czech government on February 3 2016 with Resolution no. 79 on the Prison Service Concept Until 2025),
- Strategy for Probation and Mediation (Adopted by the government on 11 October 2017 with Resolution no. 733)

- The action plan Strategy to combat social exclusion for period 2016–2020 (government Resolution no. 1067 from November 28 2016),
- Update of the Employment Policy Strategy until 2020 in the context of current changes in the job market (government Resolution no. 41 from January 31 2018),
- Strategy for Combating Extremism in the Czech Republic for 2016 to 2020
- Czech Republic Housing Policy to 2020 (government resolution no. 673 from 27 July 2016),
- The Concept of Preventing and Tackling Homelessness Issues in the Czech Republic until 2020 (government resolution no. 366 from 21 May 2014),
- Social Housing Concept of the Czech Republic 2015–2025 (government resolution no. 153 from 12 March 2014),
- The action plan Strategy to combat social exclusion for period 2016-2020 (government resolution no. 134 from 17 November 2016),
- Employment Policy Strategy to 2020 (resolution no. 835 from 15 October 2014),
- Crime Preventing Strategy in the Czech Republic for 2016 to 2020 (government resolution no. 66 from 25 January 2016),
- Strategy for Minority Policing in the Czech Republic until 2020, approved by the Ministry of the Interior, and extended on 8 January 2021 until the end of 2021),
- Strategy of Roma Integration up to 2020 (government resolution no. 127 from 23 February 2015),
- Social Inclusion Strategy for 2014 to 2020 (government resolution no. 24 from 8 January 2014).

## 4. Description of Possible Types of Violence and Risks

### Risks and forms of abuse and discrimination covered by RUBIKON Centre safeguarding policy:

- **psychological or emotional abuse** – mainly abuse of a position of power or the role within the structure of the organisation and relationships between employees/interns/volunteers and clients in the form of humiliation, disparagement, psychological coercion, manipulation or other hostile behaviour. This also includes interfering in personal issues of all persons involved without their consent, abusing the access to personal and sensitive information for coercion.

In case of employees, it may be pressuring or demanding infringement of rules or the rights stemming from the Labour Code and the working rules of RUBIKON Centre (e.g. execution of duties beyond working hours or under unsuitable conditions) or disproportionate or baseless requirements to comply with instructions or directions exceeding the framework of the usual norm for a given position.

- **physical abuse** – any display of physical violence, including intimidation or threatening with physical violence.
- **financial or material abuse** – mainly abuse of a position of power or the role within the structure of the organisation and relationships between employees/interns/volunteers and clients for personal material benefit, including accepting gifts or services for services and activities that are free of charge.

In the case of the service of material support (food bank, covering the costs of basic needs, etc.) on the part of RUBIKON Centre, the abuse may consist of manipulative behaviour or setting conditions for providing material aid other than those defined in the rules for the service.

- **neglect** – insufficient care and attention or an unequal treatment of employees/volunteers/interns and clients while providing any material or immaterial support or service.

In the area of work with clients, it may be negligence in collaboration with them, where the worker does not provide the service within the usual time frame for the service, does not offer key information or proceeds incorrectly or with mistakes, and these mistakes caused harm to the interests of the client, which could have been avoided by the worker.

- **discrimination** – disadvantaging or treating unequally when it comes to an employee/intern/student or client based on ethnicity, religion or gender or due to their health or social status.
- **institutional abuse** – this involves cases where during the activities of the organisation that concern employees/volunteers/interns and clients, there is systematic infringement of the rules of safeguarding policy, based on written and unwritten (habitual, conventional) processes. This mainly includes cases, where the organisation has the opportunity to (not) provide certain material or immaterial services, advantages or support or has physical or other power over the persons concerned and abuses this position.

## 5. Recruitment of Staff

Employees are always hired by their future line manager, who also adheres to the values stemming from the ethical code throughout the process from placing an advertisement, through personal interview up to recruitment, which in practice means respecting these internal rules:

- defines what type of people are needed for specific tasks and activities – the job description, which is the basis for creating the advertisement, and at the same time stays open to any differences to respect the principle of non-discrimination
- creates a job advertisement and arranges the recruitment with emphasis on “fairness”, which also inspires our environment on the side of employers and job applicants – publishing the actual starting salary, not requiring a clean criminal record, etc.
- ensures that the job advertisement does not discriminate (by race, gender, etc.)
- coordinates the entire hiring and selection process (preparation, organization and management of the assessment centre, planning and arranging for interviews) while ensuring the protection of personal data and complying with GDPR rules (e.g. the collection and storing of CVs is based on an agreement with the applicant) and the applicants’ sense of security (e.g. assessment centres and group interviews are conducted only with the consent of applicants)
- selects CVs, or phone pre-screening with emphasis on transparency and equal treatment – candidates are informed in advance that it is not possible to be specifically informed whether their CV has been selected for the narrow pool of applicants, and those who have been selected at least for phone pre-screening have the opportunity to get personal feedback and specific reasons for not continuing to the following round of the process
- personally and actively participates in the hiring process, conducts interviews with candidates to get to know each other and communicates as openly as possible about the open position and

additional related information – presents the style of line management within the organisational structure of RUBIKON Centre, the values of the working and team environment etc.

- verifies references for the final candidate only based on their consent and following an open debate about the use of references, ensuring the sense of security of the candidate without jeopardizing their current working relationships
- actively participates on the preparation for onboarding and, at the latest, at this point opens the topic of RUBIKON Centre values and principles
- trains the new employee and sets them tasks for the probation period Part of the on-boarding process is also “alignment with the firm culture”, which entails a wide variety of topics related to safeguarding, and the employee is expected to familiarize themselves with it and accept it before the end of the probation period, in order to stay at RUBIKON Centre.

## 5.1 Recruitment and on-boarding of employees in training positions

The hiring process for training positions <sup>1</sup> is lead by the training position director, who receives supporting input from an expert counsellor who recommends the client for a training position, i.e. their CV and evaluation. From this moment forward, the hiring process is similar to the above outlined standard, but taking into account specific aspects of a candidate with a criminal past and the objective of the training position, which means that the TP director has to mainly respect these internal rules:

- defines what type of people are needed for specific tasks and activities – the job description, which is the basis for creating the advertisement (this is presented to pinpointed clients who need a TP by their expert counsellor), and at the same time stays open to any differences to respect the principle of non-discrimination and the possibility to use transferable competences as another source to adjust the job description
- creates a job advertisement and arranges for its distribution with emphasis on “fairness”, which also inspires our environment on the side of employers and job applicants – publishing the actual starting salary, not requiring a clean criminal record, etc.
- coordinates the entire hiring and selection process (planning and arranging for interviews) with the client’s counsellor, who stays in the role of case manager and helps ensure the protection of personal data and complying with GDPR rules (e.g. the collection and storing of CVs is based on an agreement with the applicant) and the applicants’ sense of security (e.g. group interviews are conducted only exceptionally and only with the consent of applicants)
- purposely actively participates in the hiring process in person, conducts interviews with candidates to get to know each other and communicates as openly as possible about the open training position and additional related information – presents the style of management within the TP, the separation of the role of TP director and counselor, the working and team environment with emphasis on the topic of a shared workplace with other clients and possible related risks, etc.

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<sup>1</sup> Training positions are a tool to practice soft and hard work skills needed for a sustainable entry into the free labour market. They may be part of the system of the “pass-through employment”, where the client starts at a sewing shop in the prison, goes through a 6-month training position after release (ran directly in RUBIKON Centre – e.g. in the garden of the nearby community centre or other collaborating employers) until they enter the free labour market.

- selects CVs, or phone pre-screening with emphasis on transparency and equal treatment
  - candidates are also clients, which is why they are informed as soon as their CV has or hasn't been selected for the narrow pool of applicants, about the opportunity to get personal feedback and specific reasons for not continuing to the following round of the process
- verifies (not personally but through the counselor) references for the final candidate(s) only based on their consent and following an open debate about the use of references, ensuring the sense of security of the candidate without jeopardizing their right to keeping their cooperation with RUBIKON Centre private, with the exception of entities stated by law (Czech police, the Probation and Mediation Service, Courts etc.)
- actively participates on the preparation for onboarding and, at the latest, at this point opens the topic of RUBIKON Centre values and principles, with an emphasis on their needs based on their own social disadvantage, as well as possible threats in a mainstream working environment and an environment where members of the same target group as the client cumulate
- after the employee/client is hired for a training position, their records in RC database are hidden, in order to protect sensitive data related to previous collaboration between the client and their expert counselor. The counselor is the person responsible for hiding the data. The client entering a TP is informed of this, including the fact that only the line manager and their expert counselor have information about the character of their TP.
- During the probation period, there are regular meetings between the employee in the TP, their line manager and their counselor. These meetings include an assessment of their work training and plans for the next steps to be taken. The worker in a TP has the opportunity to provide feedback about their feelings about their work training, they are actively encouraged to speak their mind.

## 6. Training and Further Education of Staff

Training to perform the work related to the position together and undergoing other onboarding is set up by the line manager of every new employee, using the standardized form Goals for the probation period and training plan. These goals and plan are reviewed, updated and reflected upon by the line manager and the employee throughout the probation period (at least once a month) using constructive feedback. At the end of the probation period, the evaluation of the plan is a key milestone to agree whether to continue the working relationship, or even to change positions. The possibility to change a position, together with the style of review of the plan, is based on the principle of using an individualized approach to all employees, wherein we look for space to use their personality and professional aptitudes and characteristics. We believe in the value of teamwork and shared learning.

The content of the above mentioned plan contains a specific part (i.e. based on the tasks and working experience / education of the employee) but also a universal onboarding, which forms part of the introductory training for all positions in RUBIKON Centre.

Universal onboarding in RUBIKON Centre contains at least a tour of the workplace with the LM and meeting colleagues (with support during introductions and setting out ways to address each other formally/informally) and subsequent workshops and familiarization with these topics:



1. Safety at work
2. The workshop "Get to Know RC" (history, strategy and organization structure of RUBIKON Centre)
3. The workshop Safeguarding Policy (introduction to SG policy, ethical code, firm culture, principles and values for work with clients)
4. Introduction to work with Salesforce database (work with evidence and data evaluation from consulting with clients)
5. Introduction to the Employee Manual (internal guidelines, attendance rules...)

All expert positions under the department of Consulting for Clients also undergo other parts during the universal onboarding:

1. The workshop Client with a Criminal Past (introduction to the "ecosystem" of clients with a criminal history – the most typical network of actors around the clients, their resources and needs)
2. The workshop Consulting for Clients at RUBIKON Centre (introducing the strategy of Consulting for Clients at RC, the subjects and procedures in expert counseling, the style of work with clients at RC focusing on "client-centred focusing", case management, and finding sources of client motivation for a sustainable lifestyle change)
3. The workshop Work at a Prison (introducing principles of work at RC for clients executing their prison sentence, including some specificities and risks of the prison system that clients may face; getting to understand the role of an expert worker in prisons, safety rules in place during prison visits, familiarisation with documents related to the prison system, be it external – legal provisions, the concept of the system, or internal – principles of cooperation with clients in the system, safety rules, etc.)
4. The workshop for financial literacy (introduction to the strategy of Programs for Debt Solving at RUBIKON Centre, content of the topics and procedures in debt counseling)
5. The workshop Employment Agency RUBIKON (introducing the strategy of Employment Programmes at RUBIKON Centre, the topics and procedures in work counseling including soft topics, such as "how to be a fair employer and set an example in the free labour market" or "how to safely deliver sensitive topics the client's potential employer")
6. Sitting in during consultations between counselors and their clients at branches and in prisons, shadowing selected colleagues from the team or other teams, rotation between teams.
7. The workshop Projects (introduction to challenges and ESF financing, current projects in client consulting)

The length of the onboarding process differs depending on the degree of specialization of the position and the next phase is the continued development of the employee, meaning:

1. Independent study – the extent depends on the position and the degree of expert specialization, there is no set minimum level. It relates to point b)
2. Using feedback and the related individual and team development – employees undergo a review at least once per year, including a "development plan" and feedback on perceived needs and sources for further development from the line manager (see image below). Feedback is used (in order to develop employees but also the entirety of RC) by LM and teamleaders continuously during all team meetings and individual consultations, and the environment of RC wishes to emulate the concept of a "learning organisation".

## Main Principles of Development at RUBIKON Centre:

- The LM manages and supports the development of people in their team
- each employee is responsible for their own development
- development comes **70%** through work, **20%** with other people, **10%** from courses and independent studies

# 7. Protecting the Safety of Employees

Safety in branches is a key topic already during the hiring of a branch manager during personal interviews. We take an individualized path, we believe “nothing is really a mistake” and the safety of branches is based on the needs of individual employees who work there, although the minimum safety and security requirements are in place at all times everywhere:

- The counselor is never alone with the client at the branch
- The counselor has the right to refuse/refer a client that they do not feel safe or comfortable with
- The counselor never sits in the room with the client with the door behind the client’s back
- The counselor always has their work phone with them
- All branches inform their clients of the ban of carrying weapons on the premises of RC.

# 8. Complaints System

A **Complaint** is a submission or communication to a public or private entity, the subject of which is a shortcoming, wrongdoing or inactivity of the addressee or a person over whom the addressee has some authority or responsibility, esp. if said submission has no other name under special legal provisions.

RUBIKON Centre has a guideline for a defined procedure to deal with complaints in line with Act. no. 500/2004 Sb., (Code of Administrative Procedure) see Annex 2: Guidelines for handling complaints.

The guideline defines who is entitled to submit a complaint, how a complaint may be submitted, as well as the procedure to receive and settle a complaint.

## Why Do We Do It?

All employees of RUBIKON Centre have committed to comply with the Ethical Code of the organisation. Nevertheless, mistakes in our work with clients can sometimes happen. The point is not to never make mistakes or pretend that it cannot happen. We also don’t want to make an example out of someone by punishing them. We want to learn from our mistakes. To make this possible, we need to know about them.

Submitting a complaint can never be to the detriment to the person who submitted it, or the client concerned.

**The director must inform the management board of the organisation about the complaints she has processed at least once a year at the board meeting.**

When an RC employee starts cooperation with a client, they must inform the client about the possibility to submit complaints about the service provided – the form is available in client rooms, can be requested from RC employees and also on the organisation website.

### **What is a complaint?**

If a client or someone else who is affected by RC services marks their communication or submission as a complaint, it is a complaint regardless of the actual content. The complaint can concern the quality of service provided or workers at RC. The complaint doesn't entitle employees to impose any sanctions to the detriment of the client.

### **What is an anonymous complaint?**

An anonymous complaint is a complaint that doesn't contain data relevant to the identification of the complainant (i.e. name, surname, address), making the complainant unknown. An anonymous complaint is also a complaint wherein the data has been found out to be incorrect, such as using a non-existent address or misusing the name and address of another person.

## **8.1 Submitting complaints**

### **A complaint may be submitted:**

- In written on a printed form or in the form of a letter, where the complainant describes the circumstances they are complaining about.
- The complaint may be send via electronic mail or a data mailbox.
- The complaint may be delivered in person or submitted orally to an employee who will create a protocol.

Clients are informed (orally during the first meeting with an RC worker) about the possibility to submit a complaint. They are informed about the form a complaint can take, they are told that they can invite an independent representative or a close associate to help.

**Who submits a complaint:** A complaint may be submitted by a client or any other person involved in the case.

**How can a complaint be submitted:** A complaint may be submitted in written or orally. It can be submitted on the website [www.rubikoncentrum.cz](http://www.rubikoncentrum.cz)

**How is the complaint received:** Any RC employee is entitled to receive an oral complaint, ideally in the presence of another employee, when available. The employee will pass the complaint to the director of RC or the director of client consulting, who will record it in the "Complaint" form.

**Documentation of the complaints:** The complaint forms are numbered and stored in the file "Complaints".

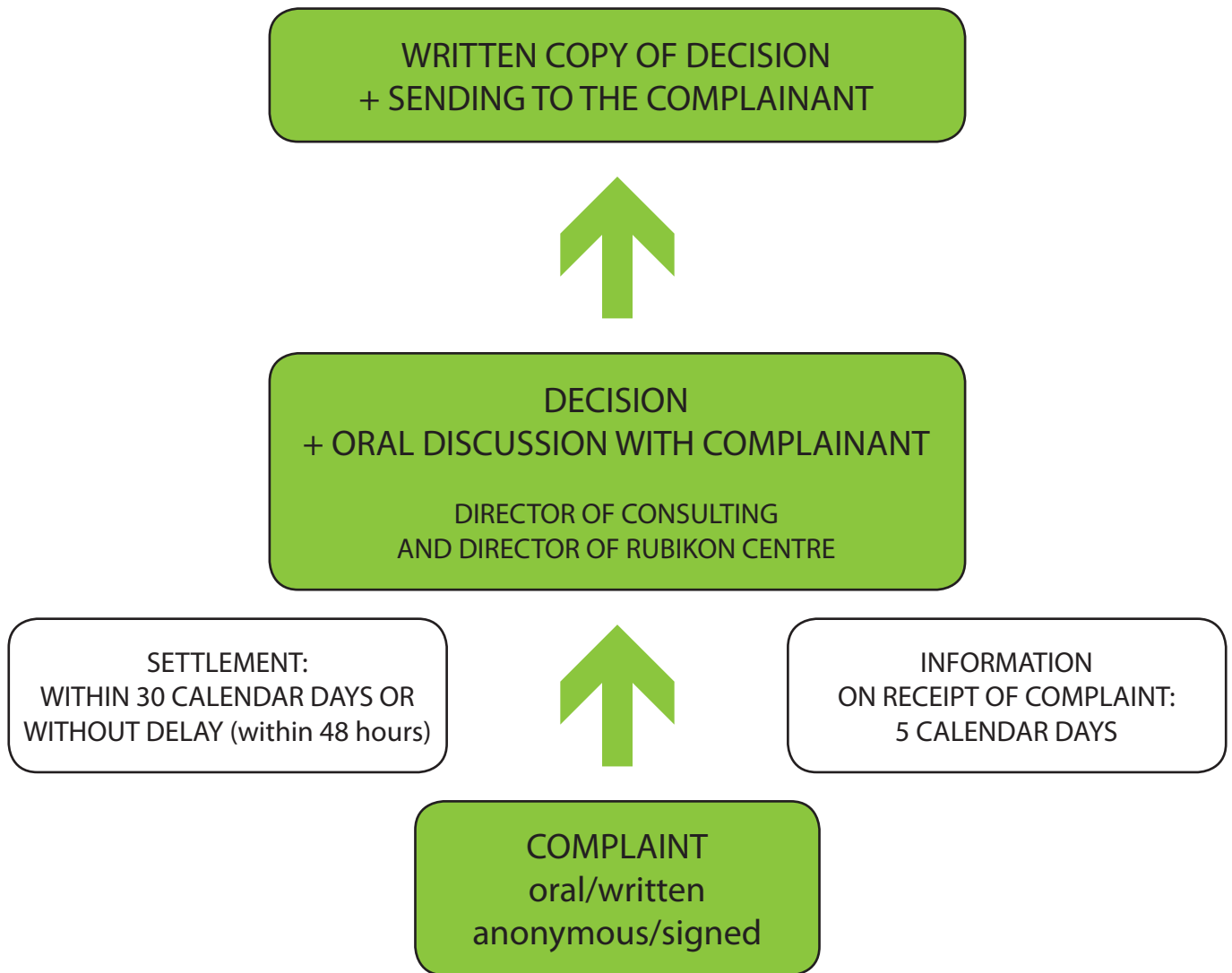
## 8.2 Handling complaints

**How is the complaint handled:** The RC director and the director of client consulting are obliged to discuss and settle every complaint, and in the case of a legitimate complaint, to correct the situation. The client has the right to be involved in the process of handling the complaint, or they may choose a representative. Another worker is involved to check the process and take corrective measures. Confrontation is considered a last resort measure, and both sides must consent to it. If the client requires it, their identity must be kept confidential. The complaint is not handled by the employee concerned.

**When is the complaint settled and what does it entail:** Each person identified in a complaint has the right to be informed about the fact within 5 working days. The complaint is settled within 30 days or without any delay (within 48 hours) in cases, where the time factor could cause harm or damage the interests of the complainant. In that case, the directors may also be represented (e.g. during their holiday) by their deputies.

The settlement of the complaint is recorded in written. Every complaint registered contains a date of reception, date of settlement, measures taken to correct the situation, preventive measures taken, name of the person who received the complaint, name of the person who handled the complaint and the result of the inquiry into the legitimacy of the complaint. The written decision is always sent to the complainant.

**What happens next:** All complaints are discussed with the complainant in person, and a report or a decision about the settling of the complaint is also created. If the complaint is deemed to be justified, immediate correction is sought, the client receives an apology from the employee concerned and the director or the manager of RC services.



## 9. Safeguarding Structure in RUBIKON Centre

Safeguarding is a cross-cutting topic that influences most processes in the life of RUBIKON Centre. The basic documents to implement this agenda within the organisations are:

- The Ethical Code
- The Employee Manual
- Rules for Collaboration with Clients – executing their prison sentence and at liberty
- Documentation for occupational safety
- The guidelines for complaint handling
- Consent with provision of personal data and using audio-visual material

To ensure a safe environment and maintain our values at RUBIKON Centre, the organisation has set up processes and identified persons responsible for this agenda:

## **A) Towards the clients:**

Person responsible: director of consulting for clients, see the previous chapter Complaints System for more.

## **B) Towards the employees, partners, interns/volunteers:**

Person responsible: the guarantor for safeguarding – value compliance, abuse or discrimination.

Person responsible for occupational safety – employees: operations manager.

At the same time, all employees of the organisation are obliged to point out and be sensitive to any non-compliance with the values of the organisation, abuse or discrimination as part of their work description. Team managers are responsible for setting up processes to align their teams' work with the culture and values of the organisation.

### **These persons have sufficient authority and competence to:**

- suggest and with the approval of management, to implement processes to protect safety and the values of the organisation
- handle the submissions of all persons concerned
- suggest solutions for specific cases
- protect the persons concerned in cases where there is a need to protect their anonymity to avoid increasing the risk of abuse or discrimination.

The guarantor for safeguarding fulfils their role regardless of hierarchy and the structure of organisation management to ensure their independence and protect the concerned persons without any conflict of interest.

At the same time, employees in this role form part of the wider management team, so they have information about planning and decision-making in the organisation and may efficiently enforce decisions related to the safeguarding policy in the organisation, or if need be, comment on and influence other processes and suggestions, which will influence safety and the protection of organisation values.

**The wider management team** fulfils its role especially at team meetings, which is a space where it is possible to discuss and decide upon changes in the structure to protect safety and values of the organisation, based on any team member's suggestions. Where appropriate and if it doesn't threaten the safety of persons concerned, other members of the team discuss and are informed of cases of abuse or discrimination or systemic infringement of values in the processes in the organisation.

### **Description of positions in the structure of safeguarding – expectations and parts in the organisation:**

**Director of services:** this is a specialized position held by an employee with an education and experience corresponding to lead the team of RUBIKON Centre consultants from a methodical and managerial point of view. Their main responsibility is quality assurance for the services provided, including maintaining safety and respecting ethical rules. Their position empowers them to introduce and adjust processes to stimulate a safe and ethical environment and to prevent infringement cases.

They also have powers in staffing (they are a superior) over the consultants and directors of branches, therefore they can decide in the area of procedural and personal sanctions or changes in case of violations of safeguarding policy in the organisation or in the course of work with clients.

**Wider management team:** this is an advisory group of managers and specialists representing all the departments of the organisation's activities. The group's work is based on the corporate culture of the organisation as a whole – support of a democratic and responsible process control, dialogue and searching for ideal solutions using consensus. Members of this team are experienced workers with a high level of knowledge of the issues at hand, as well as how the organisation works, and therefore they have sufficient qualifications to have decision-making powers in the processes of safeguarding policy. At the same time, they are line managers and department directors, and therefore they are informed and bear responsibility for management of other workers, ensuring the application of values, rules and safeguarding processes in all parts of the organizing structure.

**Manager of Operations:** they have experience in HR processes and have the powers and experience to ensure safety and protection of health in the course of work in the organisation. At the same time, they are a member of the Management of the organisation, giving them a responsibility to decide over rules in this area, as well as powers of control.

**Safeguarding Guarantor:** this position is carried out by an employee who is part of Wider Management, and they have years of practice in the organisation, ensuring knowledge of corporate culture, the structure and values, and they have specialised qualification in the area the organisation works in. Thanks to this combination, they are given enough powers and access to information and decision-making, to efficiently set up and influence processes in the organisation and deal with cases and inputs as they appear.

## 9.1 Process to handle suggestions in organisation value compliance and the role of the guarantor of safeguarding

Each employee, volunteer or intern may point out deficiencies in the processes in the organisation or specific cases of breach of the ethical code, or to resolve the situation if they themselves or someone else became a victim of abuse or discrimination in the activities of the organisation.

These suggestions may be addressed to the ombudsman/safeguarding guarantor:

**A) Directly** – in person, by phone or e-mail.

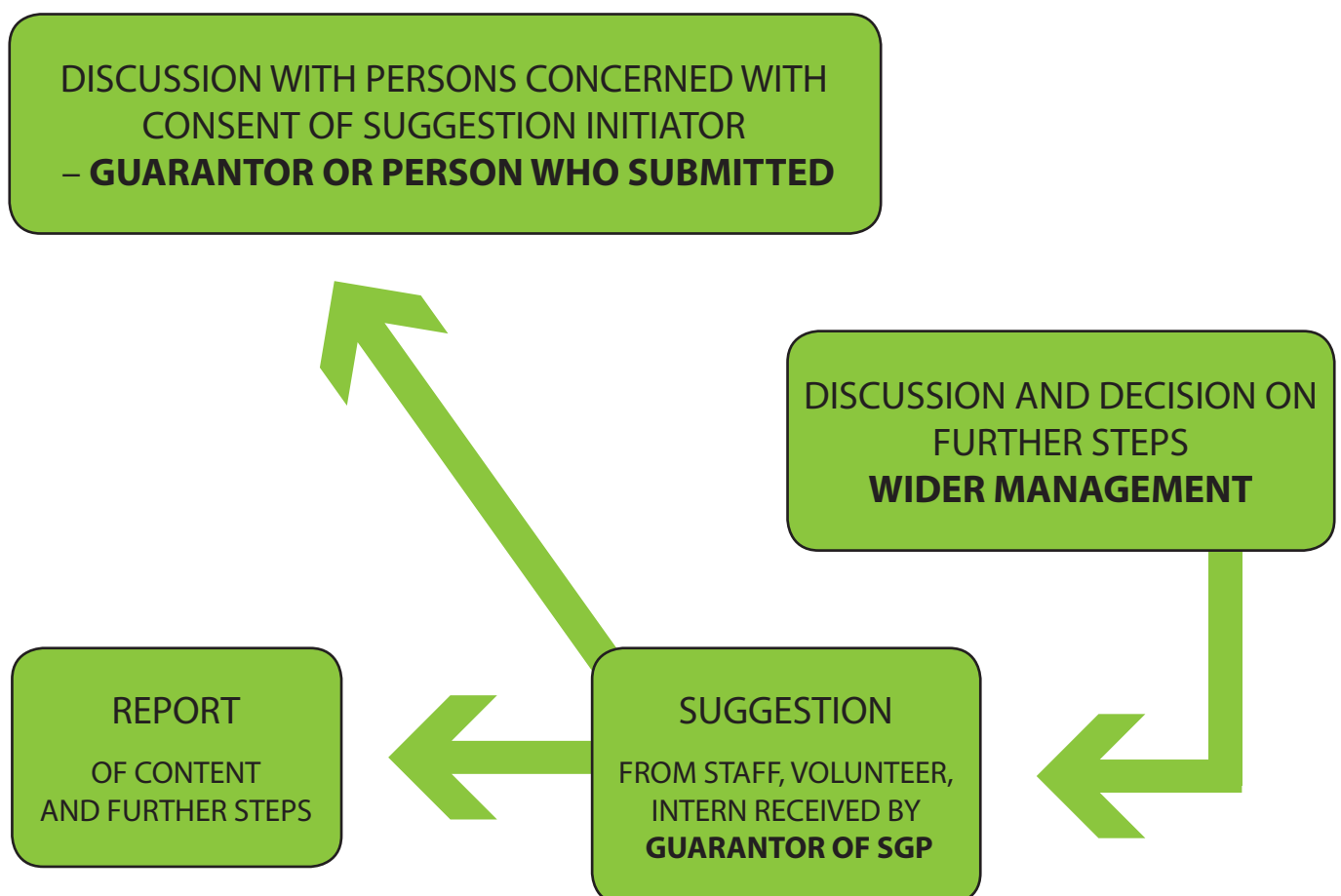
If addressed directly, it may be kept confidential who submitted the suggestion. The process of handling suggestions and cases of abuse or discrimination by the ombudsman/guarantor:

1. immediate discussion with the person who submitted the information
2. agreement on follow-up – suggestion of the solution depending on the character of the information, including a decision on who else is to be informed, what will be the steps to protect the safety of the person or persons concerned in cases of abuse or discrimination.
3. a report describing both steps, passing this report to the person who submitted the information for approval (in case of a request for confidentiality, the report is only available to the ombudsman/guarantor and the person in question)

4. notification or discussion about the situation or information with other employees is based on the consent of the person who submitted the information, or an impetus for a meeting of wider management where appropriate (changing management processes, change in the organisation documents etc.)
5. monitoring of whether the situation has been corrected or stopped if undesirable (e.g. discrimination)
6. informing the smaller management circle in cases, where the legislation in force requires it (reporting requirement in cases of criminal offence).

**B) Indirectly** – as an anonymous suggestion in a mailbox intended for these purposes, placed in the headquarters of the organisation together with a box for client suggestions. These suggestions are handled by the guarantor based on their character at the wider management meeting by proposing a change in documentation or another process to resolve a specific situation.

**Scheme of discussing suggestions in the area of compliance with the organization’s value:**





## 9.2 Procedure in case of safeguarding policy infringement with employees

1. If this is the first case with the employee, the issue is discussed and a plan is devised to correct the situation (change of attitude/behaviour, redress with the damaged persons, e.g. an apology, compensation for damages, etc.)
2. If this is a repeated behaviour, the misconduct is dealt with within the employment relation with a reprimand, which can be repeated and may lead to termination of employment.
3. If the misconduct is grave (physical violence, material or other abuse of a person, criminal activity, etc.), the case may be dealt with in legal terms also (criminal complaint, lawsuit).

The person responsible in these cases is the line manager of the employee in question, who acts based on results of enquiries, assessments and decisions of the wider management of the organisation.

# 10. Intimate relationships between employees and clients

Employees of the organisations are prohibited from forming intimate relationships with clients who are currently working with the organisation as part of the services provided. If such a relationship occurs, it is in violation of the working rules and it will be dealt with in the framework of employment procedures.

It is also not appropriate for colleagues in one team or a superior and an inferior employee to form intimate relationships. In this case, the situation may be resolved by changing posts within the organisation or agreeing on a different set of duties to avoid a conflict of interests.

With training positions, where the client is also an employee, there is also a ban on intimate relationships for specialist workers (especially counsellors), who collaborate with the client as part of the service provided. With other relationships, the rules are the same as for other employees of the organisation.

# 11. Media and PR in relation to clients

In our promotional materials and other media outputs, we always comply with all legal provisions about the protection of personal and sensitive data. When we wish to use photographs, recordings (video or audio-visual) or personal or sensitive data of clients (e.g. in written form) for our own PR activities or in collaboration with other media or institutions, the client always has to consent to this use in written, defining exactly what information about them can be published in what way.

To maintain a maximum protection of privacy and safety for our clients, we always strive to allow for authorisation of any communication, quote or other outputs containing personal and sensitive information of clients.

## 12. Safeguarding Monitoring and Evaluation

Since the beginning of the development of safeguarding policy, the team at RUBIKON Centre has tried to discover possible risks. The first analysis took place during the introductory seminar, which comprised representatives of all the positions of the organisation's team. High-risk areas for disadvantaging or threat were identified in training positions, contact between counsellors and clients in prisons, and safety in branches. Based on this initial monitoring, a process of analysis was launched, addressing best practices that already exist within the organisation, and procedures and measures that were lacking or unsatisfactory were added. This process also included employees concerned with a given area, representatives of management of the organisation and representatives of potentially vulnerable groups (including clients).

The next round of risk monitoring took place during an organisation-wide consultation in April 2020, where employees chose their own topics during group work, where they thought that attention was required in safeguarding policy, and they verified whether the processes in place already set a sufficient framework and a basis for solutions.

The setup of processes and monitoring of topics related to safeguarding policy was analysed in August 2020 in discussions with our colleague Kevin Barry, who has specific knowledge from the area of probation and the penitentiary system, he works as an external expert on safeguarding and collaborates e.g. with churches and sports clubs.

This discussion revealed another topic specific to RUBIKON Centre, and that was the requirement for a criminal record during recruitment of new employees (until now, the record was not a requirement, the criminal history was known only with clients in training positions). This question is currently being debated and a solution is under way.

The management of RUBIKON Centre and the guarantor of safeguarding monitor new inputs regularly and they keep written records of these topics and deliberations. Every six months, the guarantor of safeguarding discusses the inputs being dealt with the management of the organisation (the wider management team) and informs about facts stemming out of the list and the comparison with previous periods.

Monitoring of compliance with values, risk identification and possibilities is carried out by all managing staff within their competences among the team and line management.

Employees responsible give special attention to monitoring, see chapter 6., and report their findings in meetings of the wider management of the organisation. These workers approach the issue proactively, especially in the following forms:

- commenting and suggesting changes in written documents/rules/manuals etc. of the organisation, which relate to the topic of safeguarding
- taking responsibility for training and informing all staff on processes in case there is a change, see point 6
- random questioning, inter-vision of processes by way of interviews, participation in team meetings, checks of written output etc.

Evaluation takes place through structured and planned monitoring in the form of a questionnaire survey at least twice a year or through work in groups at an organisation-wide meeting of RUBIKON Centre.

## 13. Publishing of the Safeguarding Policy

The document Safeguarding Policy has been published on the website of the organisation. It was also sent to all employees in electronic format. It has also been formally approved by the management board of the organisation. It is available in Czech and English. We will also inform about the creation of safeguarding policy in our annual report for 2020, which is aimed mainly at donors and partners of the organisation.

Clients are informed about the possibility to use the complaints system during the first meeting. This information is also contained in the printed Rules for Collaboration, which they receive in written.

## Attachment 1: The Ethical Code

### The Ethical Code of the RUBIKON Center

#### **Mission of the RUBIKON Center:**

The RUBIKON centre helps people traverse and transition from criminal pasts. The centre support people on their paths back to society—in finding and maintaining jobs, in solving debts, and in accountability to themselves, families, and communities. RC provides clients with professional services as well as support in prisons and in life after prison. RC collaborates with key actors in the field to implement new and effective solutions. RC helps shape a society that knows how to give people a chance for a new start.

#### **Vision:**

We realize that there is a wide range of alternative punishments that are effectively used in practice. Only people whose alternative punishments cannot fulfil their purpose are placed in prison. We

envision both motivated individuals that emerge from prison gaining effective support on their way from prison to a fulfilling life and a society that gives them a chance to start again.

Our activities are based on these values:

### **1. Equal access and tolerance for differences**

We treat other cultures and differences with respect. We are sensitive to any manifestations of direct or indirect discrimination on the basis of ethnicity, religion, age, gender, health condition, social status or on any similar grounds. We openly face situations that would or could give rise to discrimination or ill-treatment. We apply the principle of non-discrimination to our clients, employees, partners and donors.

### **2. Respect and openness**

We strive to improve the situation of vulnerable and disadvantaged groups and strengthen their role in society. We approach the life situation of our clients with respect to their free decision on the structure of their lives. When working with a client, we are interested in his/her perspective and we are sensitive to his/her needs and opinions. We consider clients as equal partners who have an irreplaceable role and importance in the process of finding and realizing solutions to their situations.

### **3. Development of potential and a safe environment**

We support clients in personal responsibility for themselves and their surroundings. We provide a secure environment that enables our clients to develop their potential and capabilities. We help clients gain faith in their abilities and we look for opportunities with our clients for ways to use those abilities.

### **4. Restoring the damaged relationships**

We approach the life stories of our clients in a complex manner. We assess them from the perspective of the needs of the clients themselves, needs of the victims and the community.

### **5. Professionalism**

We select motivated employees for our team who identify with our values and vision. We put an emphasis on the professionalism of our employees. We care about their professional integrity and support their professional growth. We create an environment of trust and teamwork and a space for commitment, autonomy and courage to bring new solutions.

### **6. We learn from the experience of people with criminal past**

We make use of the experience and inputs of those who have direct experience from within the criminal justice system. We have colleagues who have experienced incarceration and the process of reintegration after release and they are an integral part of our team. This gives us a unique insight and sensitivity towards the topic that we are working on.

### **7. Accountability and transparency**

We report the results of our work emphasizing quality, efficiency, and consistency between individual interests and the interests of the community. We regularly publish information about our activities and the use of entrusted funds.

## **8. Partnering Teamwork**

We believe in the value and strength of cooperation and teamwork. We cooperate constructively with institutions and experts in the area of criminal justice and prison systems, local authorities, employers, and communities. Not only do we cooperate on the level of solving individual cases and meeting clients' interests and needs, but we also cooperate on the level of initiating systemic changes.

## **9. Zero Tolerance Towards Violence**

Our employees refrain from any form of violence as defined in the Safeguarding Policy. They don't take advantage of their power over the clients or misuse it for their personal benefit. Non-violent behaviour is also required from the clients. Employees empower the clients in non-violent and non-discriminatory behaviour.

# **Attachment 2: Guidelines for handling complaints**

See the Czech version attached.