

Safeguarding Policy

Policy Name	Safeguarding Policy
Executive Owner	Chief Financial Officer
Approval body	Board
Frequency of approval	Annual
Date approved	March 2025
Date next approved	March 2026

Policy Statement

We are committed to ensuring that our employees, volunteers, and trustees work in a way which reduces risk of harm to themselves, their colleagues and to others affected by our work, particularly those who may be more at risk of harm, including children, young people, and vulnerable adults.

As a grant maker, we will ensure that we embed safeguarding into all stages of our grant making cycle. We will ensure continuous improvement and learning in our practice, acknowledging that organisations applying for funds have primary responsibility for safeguarding their own beneficiaries, staff and volunteers, but that as a funder we have a role and responsibility in promoting best practice and a duty of care in our grant-making.

The Designated Safeguarding Lead is the Chief Financial Officer.

The Board has also appointed a Safeguarding Trustee with relevant experience to lead and advice at governance level.

Principles

- We have a responsibility to safeguard people's wellbeing and to protect people from all forms of harm.
- We are committed to promoting welfare and protecting vulnerable groups from harm.
- We have a duty of care towards each other, other stakeholders, and any vulnerable groups with whom they come into contact. Vulnerable groups are those who are unable to protect themselves and others from harm. This includes all children and those adults who may be at risk of harm due to a disability.
- We seek to ensure everyone is treated equally, with dignity and respect at all times and ensure that people feel empowered to take an active role in matters which affect them.
- We seek a culture of support and encouragement for those who wish to share safeguarding concerns even where these issues may be difficult to confront.

Legal framework

The key UK legislation and guidance upon which this policy is based includes:

- The Charity Commission for England and Wales, which provides guidance on safeguarding and protecting people.
- The Children Act 1989.
- The Protection of Children Act 1999.
- The Safeguarding Vulnerable Groups Act 2006.
- The Charities (Protection and Social Investment) Act 2016.

Roles and Responsibilities

Board

Charity Commission guidance for trustees states that as part of fulfilling trustee duties, you must take reasonable steps to protect from harm people who come into contact with your charity. This includes:

- people who benefit from your charity's work
- staff
- volunteers
- other people who come into contact with your charity through its work

Among other things, it is the responsibility of the Board to ensure that the charity:

- Has appropriate policies and procedures in place, which are followed by all trustees, volunteers and beneficiaries
- Knows how to spot and handle concerns in a full and open manner
- Has a clear system of referring or reporting to relevant organisations as soon as concerns are suspected or identified
- Makes sure protecting people from harm is central to its culture.

Chief Executive

The Chief Executive must ensure that the organisation has at least one designated staff member ("Designated Safeguarding Lead") to support the implementation of this policy and its associated procedures and guidance. The Chief Executive must ensure that the appointed individual has the relevant knowledge, skills, experience and sufficient seniority within the organisation to adequately fulfil their responsibilities - and that they have time and resources necessary for them to fulfil these responsibilities to the best of their abilities.

The Chief Executive must ensure that all trustees are made aware of the Safeguarding policy.

Designated Safeguarding Lead

The purpose of the Designated Safeguarding Lead is to champion the full implementation of the Safeguarding policy. They must fulfil their responsibilities to the best of their abilities, including ensuring serious incidents are:

- Reported and recorded
- Recorded in the charity's Register of Incidents, Complaints and Accidents (RICA)
- Reported to the Charity Commission, the Police or others as appropriate.

The Designated Safeguarding Lead should provide updates to the Chief Executive and the Board regarding the matters set out in this policy.

The Designated Safeguarding Lead is also responsible for overseeing the register of issues raised. This register records in an appropriate level of detail, information relating to all alleged and substantiated safeguarding and other issues which have been escalated within the organisation and records of how these issues were dealt with.

Oversight & Escalation

Oversight

The Board has appointed a Safeguarding Trustee who takes the lead at Board level for Safeguarding. In addition, there is:

- A standing agenda item at Board meetings to discuss any safeguarding incidents
- An annual review of safeguarding at People Committee
- A quarterly review of all incidents, complaints and accidents at FARR

Escalation

Should a safeguarding incident occur, the Designated Safeguarding Lead (or in their absence, another member of ELT) will report the incident to the Safeguarding Trustee as soon as is practicable. The Safeguarding Trustee will act as the primary point of contact on the Board in relation to the incident.

Depending on the type, scale and severity of the incident, incidents may also be escalated to other trustees, however this would be considered on a case-by-case basis and at the discretion of the Safeguarding Trustee and Designated Safeguarding Lead.

Dealing appropriately with concerns

All employees, volunteers and trustees acting on our behalf should feel able to raise any safeguarding suspicions, concerns or allegations of abuse. Please refer to our Whistleblowing Policy.

To report a concern, you should do the following:

- Report your concern to the Designated Safeguarding Lead without delay. If the Designated Safeguarding Lead is unavailable or if you think it would be inappropriate to discuss a safeguarding matter with them you should contact the Chief Executive directly, or Chair of the Board as appropriate.
- If possible, report in writing, or request a meeting/telephone conversation to report your concerns (which, with your permission, will be documented / recorded).
- Ensure that the record is based on fact. Where opinion is included, it must be supported by factual detail.

If we become aware that a crime has potentially occurred, we will consider what steps to take and comply with UK statutory duties.

Failure to follow this policy may lead to disciplinary action or ending a relationship with the individual concerned.

Reporting abuse

If you see or hear about something which could be abuse (see Appendix “Recognising Abuse”), do the following:

- If there is immediate danger or someone needs urgent medical attention call the police or an ambulance.
- Tell the Designated Safeguarding Lead immediately.
- If no one is in immediate danger and the person at risk is present, ensure the person is as safe as possible and avoid them returning to a situation in which they may be at risk.
- Make a note of what has happened; what you have been told; what you have seen in as much detail as possible. This should include what was seen/heard and the reasons for the concern or allegation; it should also include date, time and place of the alleged incident.
- Remain calm and try to be reassuring; don't be judgemental or show your emotions.
- Keep an accurate record of your conversations and the actions and decisions taken by yourself and others.
- Be mindful that information relating to safeguarding issues can be highly sensitive; ensure any records are kept safe and confidential, and ensure any conversations are made in appropriate locations to avoid being overheard and breaching an individual's privacy.

It is essential in all cases of suspected abuse that action is taken quickly and professionally. Any allegation of abuse made must be taken seriously and we acknowledge that this will likely be a distressing and stressful situation for those involved.

We will fully support and protect anyone who in good faith reports their concerns about a colleague's practice.

In the event that any employee, volunteer or trustee suspects any other of abusing anyone, it is their responsibility to bring these concerns to the

Designated Safeguarding Lead. If the Designated Safeguarding Lead is not contactable, then you should inform the Chief Executive.

Grant applicants or grant holder

Social Change

We require all applicants and grant holders to show their commitment to safeguarding through their policies and procedures. At application stage, we ask all applicants to provide information on any safeguarding incidents logged either internally or with the Charity Commission over the last 12 months. We might reject applications at this stage, if any significant gaps in safeguarding are identified. We may also refer applicants to other organisations for training and advice prior to considering an application.

As part of our assessment process and ongoing monitoring of funded projects, we would want to know the date of their last safeguarding policy review, and the regularity with which it is reviewed.

In addition to regular updates in periodic progress reports, we encourage timely notification of any serious concerns or incidents involving children, vulnerable adults, staff members or any other parties associated with your organisation. We would expect that any consequences for breaching the safeguarding policy and code of conduct will be linked to organisational disciplinary procedures.

Where our grant holders work directly with children and / or vulnerable adults, we expect trained designated safeguards leads to be in place, and that adequate training is given to all staff and volunteers working directly with vulnerable groups.

For grant holders, our grant agreement requires that adequate policies and procedures are in place with appropriate screening and background checks conducted on anyone working with children and vulnerable adults.

We expect timely notifications of serious concerns or incidents during the project duration. We expect any safeguarding allegation or suspicion at a grant holder to be handled through that organisation's policy, and to be dealt with sensitively respecting the rights and feelings of the victim and the integrity and reputation of the organisation.

If you become aware of a safeguarding concern involving a grant holder, you should inform the Designated Safeguarding Lead.

Research

Grant applicants and grant holders are usually attached to large Universities, NHS Trusts or other public bodies, who will all typically have significant safeguarding infrastructure in place.

Should a grant applicant not be attached to such an organisation, we will consider our safeguarding requirements on a case-by-case basis, but they will be broadly in line with the requirements of the "Social Change" section above.

During the application process, we ask for a link to their organisation's safeguarding policy or procedures. We also ask whether Research Ethics Committee (REC) approval is required for the research, which is reviewed by RGAP. RECs are delivered by the Health Research Authority and are in place to protect the rights, safety, dignity and wellbeing of research participants.

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Project visits

Staff and volunteers might have direct contact with children and vulnerable adults during project visits or events. All staff should always be accompanied by the appropriate representative at the organisation being visited.

Training

All new employees and volunteers should receive appropriate safeguarding training as soon as practicable following the start of their involvement with the organisation and receive refresher training at regular intervals, as appropriate to their role.

Background checks

Managers will ensure that appropriate background checks are carried out, as set out in our Recruitment Policy. Advertisements for job roles will specify the nature of the work, and whether it will require a DBS check.

Allegation concerning the Chief Executive or the designated Safeguarding Lead

If the allegation concerns the Chief Executive, the matter should be discussed with the Designated Safeguarding Lead who will discuss it with the Chair of the Board.

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Appendix 1 – Recognising abuse

Abuse can take many forms, and it may be regarded not only as the commission or omission of an act, but also as the threat or risk of such. If a person is led to believe that they will be abused this is in effect the equivalent of the abuse taking place. References to historic abuse may be disclosed and these should be acted upon in accordance with this procedure.

- **Physical abuse** is non-accidental harm to a person caused by the use of force, which results in pain, injury or a change in the person's natural physical state. Some examples are hitting, shaking, slapping, pushing, kicking and rough handling.
- **Sexual abuse** includes rape and sexual assault or sexual acts to which the person has not consented or has been coerced or pressurised into performing.
- **Psychological or emotional abuse** is behaviour that has harmful effect on a person's emotional health and development and can include the use of threats, humiliation, intimidation, coercion or verbal abuse.
- **Financial abuse** involves an individual's funds or resources being inappropriately used by a third person. It may include theft, fraud, exploitation, the withholding of money or the inappropriate or unsanctioned use of a person's money or property.
- **Neglect** is the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. It can include failing to provide adequate food, shelter and clothing, or neglect of, or unresponsiveness to basic emotional needs.
- **Institutional abuse** is the collective failure of an organisation to provide an appropriate and professional service to adults at risk. It includes failure to ensure the necessary safeguards are in place and it may be part of the accepted custom and culture within an organisation.
- **Discriminatory abuse** occurs when values, beliefs or culture result in a misuse of power that denies mainstream opportunities

to some groups or individuals. It includes discrimination based on race, culture, gender, sexuality, religion or disability.

- **Exploitation and modern-day slavery** encompass forced labour, human trafficking and domestic servitude through the use of coercion, deception and force.
- **Domestic abuse, stalking and Honour based violence (DASH)** is defined as “any incident of threatening behaviour, violence or abuse between adults who are or who have been intimate partners or family members, regardless of gender or sexuality”.
- **Radicalisation and being drawn into terrorism** – S. 26 of the Counter Terrorism and Security Act 2015 recognises that some people are at greater risk of harm from radicalisation, and that safeguarding is the process of protecting vulnerable people from all forms of abuse, including being drawn into terrorist related activity.

Appendix 2 – Embedding safeguarding into grants practice

All organisations applying for or receiving grant funding have the primary responsibility for safeguarding beneficiaries, staff and volunteers, and must take all the necessary steps to ensure that their organisation is operating in a safe and secure environment.

We expect these minimum standards to include a:

- Safeguarding policy in the applicant organisation's own name;
- Named representative within the organisation;
- Safeguarding policy including a section on training for all staff/volunteers/trustees who have face-to-face contact with children and young people or adults at risk;
- Safeguarding policy including a clear statement about background checks for all staff and volunteers;
- Safeguarding policy including clear steps to take in the event of an incident or disclosure, including who to inform and how to contact them.

As funders we will ensure that:

- We undertake due diligence checks to confirm the minimum standards set out above;
- We ask applicants to declare safeguarding incidents which have occurred at the earliest possible stage;
- Where there are issues of concern, we may explore these as part of the grants assessment, but we are not able to provide advice and support around the development of safeguarding policies and procedures and, if we provide a grant, do not in any way endorse or approve the beneficiary's policies, except that minimum standards have been met;
- Each charity's grant terms and conditions outline expectations in regard to informing us of serious incidents (including relating to safeguarding);
- Permission has been given before using images of any grant beneficiaries in promotional materials.