Imperial Health Charity Safeguarding Policy

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Contents

Policy statement

Imperial Health Charity believes that nobody (either our people or the people we support) should ever experience harm of any kind regardless of age, disability, gender, race, religious belief, sexual orientation or identity. This includes but is not limited to neglect, physical, sexual and emotional abuse.

Imperial Health Charity's core activities take place within the Imperial College Healthcare NHS Trust hospitals we support, and involve interaction with patients receiving care, visitors, staff and members of the general public, which include children and young people, as well as adults at risk. As such we appreciate that our people will routinely come into contact with some of the most vulnerable groups within our society.

Imperial Health Charity understands the importance for everyone working on our behalf to operate within a transparent framework (our Code of Behaviour) and be able to identify and raise concerns relating to an individual's safety. Where we operate within the hospitals, our staff, volunteers, trustees and associated personnel are obliged to conduct themselves in accordance with and follow the NHS Trust's policies and reporting procedures for safeguarding children and young people, and safeguarding adults.

This policy establishes Imperial Health Charity's expectations for people working on our behalf to ensure that we meet our obligations both as an independent charity and a partner operating within the NHS Trust and under their safeguarding policies and procedures, in recognising and reporting harm or suspected harm. These expectations are covered in our Code of Behaviour (published in our Green Card resource), which includes clear behaviours, required of all of our people, designed to create a culture of transparency and safety, ensuring that, in addition to protecting people from harm, no one is put in a position where an allegation of inappropriate behaviour can be made.

We acknowledge that harm to individuals (particularly children and young people, and adults at risk) may arise from or be reported/disclosed through:

- The conduct of staff, volunteers, trustees or other personnel associated with Imperial Health Charity.
- The design and implementation of Imperial Health Charity's charitable activities and programmes of work.
- Projects and initiatives funded through Imperial Health Charity's grants programme.

This policy lays out the commitments made by Imperial Health Charity, and informs staff, volunteers, trustees, associated personnel and grant recipients of their responsibilities in relation to safeguarding.

Imperial Health Charity commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

Imperial Health Charity's key method for prevention is our Code of Behaviour, which establishes clear expectations as to the behaviour of its staff, volunteers, trustees, associated personnel and recipients of our grant funding which supplements the NHS Trust's policies. Imperial Health Charity will not tolerate abuse and exploitation by our staff, volunteers, trustees or associated personnel.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under Imperial Health Charity's Anti Bullying and Harassment Policy

What is safeguarding?

Safeguarding means protecting a citizen's health, wellbeing and human rights; enabling them to live free from harm, abuse and neglect. It is an integral part of providing high-quality health care. Safeguarding children, young people and adults is a collective responsibility.
(https://www.england.nhs.uk/safeguarding/about/)

Operating as a charity within the health sector, our approach is two fold:

1. Protecting people, including children and at risk adults, from harm that arises from coming into contact with us and our activities.

2. Protecting our people from allegations by creating a culture of transparency and safety around expected behaviours.

A child is legally defined as anyone who has not yet reached their 18th birthday. *The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection. (Working Together to Safeguard Children, July 2018)*

An adult at risk is a person aged 18 or over who is or may be in need of care by reason 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. *(Think Local Act Personal Care and Support Jargon Buster, accessed March 2019)*

Further definitions relating to safeguarding, including types of harm and abuse are provided in the glossary.

Scope – who this policy applies to

- All staff working on behalf of Imperial Health Charity, including permanent, fixed term or casual contracts.
- All volunteers appointed by and operating on behalf of Imperial Health Charity.
- All trustees appointed by and operating on behalf of Imperial Health Charity, including members of the Charity's sub-committees and advisory groups.
- Associated personnel whilst engaged with work or visits related to Imperial Health Charity, including but not limited to the following: consultants; contractors; workshop or training providers, programme visitors including journalists, celebrities and politicians.
- Individuals, groups and/or organisations who benefit from, or are involved in grant funded projects or initiatives.

Prevention

Our Code of Behaviour – keeping people safe (Our Green Card)

The following code of behaviour is enshrined in our practical Green Card printed resource which is made available to every person who interacts with or on behalf of Imperial Health Charity.

Imperial Health Charity believes that all staff, volunteers, trustees, associated personnel or recipients of our grant funding should champion what we do, live our values and act as role models in all aspects of their work.

We believe that nobody (either our people or the people we support) should ever experience abuse of any kind regardless of age, disability, gender, religious belief, race, sexual orientation or identity. This includes but is not limited to neglect, physical, sexual and emotional abuse.

As an organisation we work with patients, volunteers, staff and members of the community who are children and young people, or adults at risk.

- **Do** treat everyone with dignity and respect in line with our Values; Kind, Collaborative, Aspirational and Expert
- **Do** remember you are a role model at all times - be accountable for your actions and accept constructive feedback, at all times.
- **Do** wear your identification at all times and follow the dress code and infection control/health and safety arrangements for your location
- **Do** provide excellent customer service and strive to ensure that every patient, visitor or member of the community has the best possible experience when interacting with us
- **Do** carry out appropriate tasks and activities within the boundaries agreed within your role description, even in difficult circumstances
- **Do** treat everyone equally and encourage an open and transparent culture, where people can challenge inappropriate attitudes or behaviours - do not show favouritism
- **Do** remember that you have been placed in a position of trust - do not abuse this
- **Do** report all allegations, suspicions and concerns immediately
- **Do** remember that someone may misinterpret your actions
- **Do** respect everyone's right to personal privacy
- **Do** make everyone (volunteers, staff, family members and carers of patients) aware of our safeguarding arrangements and share our code of behaviour – the 'Green Card'
- **Do** create an environment where people you interact with feel safe to voice their concerns
- **Do** keep up to date with required training and compliance procedures for your role and responsibilities

- **Do not** plan to be alone with a young person, adult at risk or patient in one of our hospitals
- **Do not** consume alcohol when you are directly responsible for young people or adults at risk, and never allow under 18s at our events or activities to drink alcohol
- **Do not** trivialise abuse or bullying of any kind or let it go unreported
- **Do not** engage in inappropriate physical contact or one-to-one activities with young people or adults at risk, other than providing support for them to take part (following appropriate training)
- **Do not** use inappropriate, suggestive or threatening language, whether verbal, written or online
- **Do not** overstep the boundaries between yourself and patients, young people and/or adults at risk involved in our work by engaging in friendships or sexual relationships
- **Do not** allow activities that encourage bullying behaviour including initiation ceremonies, dares or forfeits
- **Do not** behave in a way which could damage the reputation of Imperial Health Charity, Imperial College Healthcare NHS Trust or one of our partners
- **Do not** rely on your reputation or position to protect you from accusations or challenges for inappropriate behaviour.

Breaches to our Code of Behaviour will be dealt with through formal conversations as follows:

- Staff members – line managers or department heads
- Volunteers – Volunteering Managers
- Trustees – Chair and/or Chief Executive
- Associated personnel – main contact within Imperial Health Charity
- Grant recipients – Head of Grants/Grants Manager

- Chair of Trustees – A panel comprising the Chief Executive with at least two other trustees
- Chief Executive – A panel comprising the Chair of Trustees with at least two other trustees

Formal conversations will be recorded, signed and dated, to be retained securely.

Imperial Health Charity responsibilities

Imperial Health Charity will:

- Ensure all staff and volunteers have access to, are familiar with, and know their responsibilities within this policy and our corresponding Code of Behaviour
- Ensure that where staff and volunteers carry out tasks within the NHS Trust's hospitals, they are familiar with the NHS Trust's policy and reporting procedure for safeguarding children and young people, and safeguarding adults
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Imperial Health Charity. This includes the way in which information about individuals in our programmes is gathered and communicated
- Implement robust safeguarding procedures when recruiting, managing and deploying staff, volunteers and associated personnel
- Ensure staff and volunteers receive training on safeguarding at a level commensurate with their role in the organisation
- Follow up on reports of safeguarding concerns promptly and according to due process
- Ensure that people involved in grant-funded projects or initiatives are given copies of and made aware of the importance of our Code of Behaviour

Staff and volunteer responsibilities

Child safeguarding
Further to our Code of Behaviour, Imperial Health Charity staff, volunteers, trustees and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18, who has a connection to the work of Imperial Health Charity and/or Imperial College Healthcare NHS Trust
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking
- Trivialise abuse or let any of the above go unreported

Adult safeguarding
Further to our Code of Behaviour, Imperial Health Charity staff, volunteers, trustees and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including slave labour or trafficking
- Trivialise abuse or let any of the above go unreported

Protection from sexual exploitation and abuse
Further to our Code of Behaviour, Imperial Health Charity staff, volunteers and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries
- Engage in any sexual relationships with beneficiaries

General responsibilities
Additionally, Imperial Health Charity staff, volunteers, trustees and associated personnel are obliged to:

- Contribute to creating a safe environment for all those that engage in the charity's work, promote the principles of the Safeguarding Policy and allows concerns to be raised and investigated within the charity
- Actively promote the implementation of the Safeguarding Policy including the day to day use of our Code of Behaviour
- Actively report any concerns or suspicions regarding violations to our Code of Behaviour by an Imperial Health Charity staff member, volunteer, trustee or associated personnel to the Safeguarding Lead or Deputy. If a concern is about either of these roles, then raise with the Head of Office or the Chief Executive.
- Actively report any concerns or suspicions regarding abuse observed within the NHS Trust or by NHS Trust staff to the NHS Trust Safeguarding Teams.

Enabling reports

Imperial Health Charity will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff, volunteer, trustee or associated personnel reporting concerns or complaints through formal whistleblowing channels (and if they request it) will be protected by Imperial Health Charity's Whistleblowing Policy.

Imperial Health Charity will also accept complaints from external sources such as members of the public, partners and official bodies. In an emergency or immediate life threatening situation we recommend that people contact 999 in the first instance.

How to report a safeguarding concern
Imperial Health Charity's principal purpose is to work in partnership with and provide support relating to the National Health Service of Imperial College Healthcare NHS Trust, currently primarily based within the five hospitals of Charing Cross, Hammersmith, Queen Charlotte's & Chelsea, St Mary's and Western Eye. As such, a large proportion of our charitable activities take place within one of these hospitals and relate to patients and their visitors, hospital staff and the hospital facilities. Where a concern relates to an individual within one of the NHS Trust's hospitals, Charity staff, volunteers, trustees or associated personnel are instructed to follow the NHS Trust's policies and procedures for reporting (see Reporting Procedure for incidents/disclosures in NHS hospitals).

Online reporting
Imperial Health Charity recognises that abuse can be carried out using online digital methods, and as such we carry the CEOP (Child Exploitation and Online Protection command) reporting button throughout our website. This button enables quick and easy reporting of any concerns relating to online abuse of children. *(www.ceop.police.uk/safety-centre)*

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should be kept secure at all times.

Sharing information or seeking advice about safeguarding people should not take place during "corridor conversations" as this setting is not conducive to good communication, listening or confidentiality. Wherever possible a suitable private area should be found to continue the discussion. *(Safeguarding Children & Young People Operational Policy, Imperial College London Healthcare NHS Trust, August 2016)*

Information relating to our staff, volunteers, trustees and associated personnel or concerning any incidents and/or disclosures relating to safeguarding will be managed according to Imperial Health Charity's Privacy Statement, available online at: www.imperialcharity.org.uk/privacy-statement.

Reporting Procedure for incidents/disclosures in NHS hospitals

The following reporting procedure follows the Safeguarding policies and procedures of Imperial College Healthcare NHS Trust.

1. A report is made

The procedure for reporting incidents or disclosures relating to safeguarding within Imperial College Healthcare NHS Trust is through the line management. NHS staff are instructed to make reports and escalate concerns through their line manager, or in their absence a Duty Manager or Senior Nurse, depending on the service/environment. As such Imperial Health Charity's policy on reporting any safeguarding concerns observed or disclosed within the NHS Trust's hospitals mirrors this.

Imperial Health Charity staff, volunteers, trustees and associated personnel must follow the following steps:

RECOGNISE that abuse may be discovered or suspected by:
- A direct observation of the abuse taking place or evidence that it has taken place
- A complaint received in any form
- Disclosure directly from the person who has been abused or is at risk of abuse

SECURE the individual's safety:
- If the individual is at immediate risk of harm, call 999
- Deal with any immediate needs they have – do they need to go to A&E or receive first aid?
- Check if anyone else is at risk based on what you have recognised in step 1

DOCUMENT what you have heard and observed:
If a safeguarding concern is disclosed directly to you, you should bear the following in mind:

- Listen and allow an individual making a disclosure to speak without interruption, and accept what is said
- Be understanding and reassuring – do not give your opinion
- Tell them you will try to help but must pass the information on – do not make promises of complete confidentiality
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation

Document any observations, concerns or direct disclosures being sure to capture (some services within the Trust will have an Incident Report Form for this):

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Date(s), time(s) and location(s) of incident

ESCALATE/REPORT:
- To the NHS Trust line manager for the area, or the relevant Trust Safeguarding team:
  - Children and Young People Safeguarding Team: 020 3312 5173 or Bleep 1178 (imperial.safeguarding.children@nhs.net)
  - Adult Safeguarding - Anoushka Khorramian-Pour: 020 3312 5173 / 07825 218451 (imperial.safeguarding.adults@nhs.net)
  - Bleep 1179 for domestic abuse and modern slavery exploitation advice
  - Bleep 1176 for safeguarding maternity advice
- A copy must also be made to the Imperial Health Charity Safeguarding Lead: 020 3857 9848 / safeguarding@imperialcharity.org.uk within 24 hours

2. Action is taken by Imperial College Healthcare NHS Trust

Imperial College Healthcare NHS Trust will take appropriate action, liaising with Imperial Health Charity as appropriate, for example if one of our staff, volunteers, trustees or associated personnel is implicated in any report made. It is the responsibility of Imperial College Healthcare NHS Trust to deal appropriately with any reports made according to their own policies and procedures.

Imperial Health Charity will make a record in the safeguarding log and follow any instructions from Imperial College Healthcare NHS Trust, following our procedures in the appendices as required.

Action will be taken by Imperial Health Charity based on advice from the NHS Trust's Safeguarding Teams and/or statutory agencies.

Where a member of Imperial Health Charity staff, volunteer or trustee is the subject of an allegation of abuse/safeguarding concern we will follow our processes for handling allegations about staff or volunteers and trustees, as outlined in appendices 1-4 as applicable.

3. Outcome

Where a report is made, which does not implicate someone operating on behalf of Imperial Health Charity, we may not receive information relating to the outcome owing to the confidentiality of the case. Where we do receive an update this will be captured in our safeguarding log.

Where a staff member is dismissed or a volunteer's involvement is ended as a result of a breach of this policy we will report this to the Disclosure & Barring Service and information relating to the individual and their dismissal will be retained securely by the Charity until their 65th birthday or for 10 years which ever is longer *(NSPCC Child Protection Records Retention and Storage Guidelines, October 2018)*.

A copy of concerns will be added to the person's volunteer/employment file as well as a central record of the concern/action taken.

Records relating to Child Protection, will be kept securely for seven years after the subject(s) reach school leaving age and will be destroyed at their 25th birthday. *(NSPCC Child Protection Records and Storage Guidelines, April 2019)*

Where an incident concerns the involvement of a member of Imperial Health Charity staff, a volunteer, trustee or other associated personnel and the incident is deemed a serious incident requiring reporting by the Charity Commission to them (see list below) we will follow the steps outlined below in Charity Commission Reporting Requirements.

Reporting Procedure for incidents/disclosures at Imperial Health Charity premises and/or events (not on NHS Trust property)

1. Report is received

Reports can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If you hear something in an informal discussion or chat that you think is a safeguarding concern, you should report this to the charity's Safeguarding Lead or Deputy.

Imperial Health Charity staff, volunteers, trustees and associated personnel must follow the following steps:

RECOGNISE that abuse may be discovered or suspected by:
- A direct observation of the abuse taking place or evidence that it has taken place
- A complaint received in any form
- Disclosure directly from the person who has been abused or is at risk of abuse

SECURE the individual's safety:
- If the individual is at immediate risk of harm, call 999
- Deal with any immediate needs they have – do they need to go to A&E or receive first aid?
- Check if anyone else is at risk based on what you have recognised in step 1

DOCUMENT what you have heard and observed:
If a safeguarding concern is disclosed directly to you, you should bear the following in mind:

- Listen and allow an individual making a disclosure to speak without interruption, and accept what is said
- Be understanding and reassuring – do not give your opinion
- Tell them you will try to help but must pass the information on – do not make promises of complete confidentiality
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation

Document any observations, concerns or direct disclosures using the Imperial Health Charity Incident Report Form, being sure to capture:

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Date(s), time(s) and location(s) of incident

ESCALATE/REPORT:
- To the Imperial Health Charity Safeguarding Lead or Deputy: 020 3857 9848 / safeguarding@imperialcharity.org.uk immediately

  If an individual does not feel comfortable reporting to the Safeguarding Lead/Deputy (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to the Head of Office or failing that the Chief Executive.

  - Head of Office: Louise Stephens – 020 3326 8999
  - Chief Executive: Ian Lush – 020 3857 9841
  - Additionally, any concerns or advice required relating to children and young people (under 18) can be reported through the NSPCC helpline on 0808 800 5000

Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. Senior managers and trustees will only receive information relating to safeguarding concerns where appropriate on a 'need to know' basis.

If an individual making a report is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report, either to the Chief Executive, to the Board of Trustees, or to an external statutory body. An individual making a report will be protected against any negative repercussions as a result of this report. See Imperial Health Charity Whistleblowing Policy.

2. Action is taken by Imperial Health Charity

The Safeguarding Lead or Deputy will review and record the information reported and will decide to either:

- Contact the local Multi Agency Safeguarding Hub (MASH) or children's services (if the subject is under 18) or the Safeguarding Adults helpline (in the case of adults at risk) for advice within 12 hours of the report. The call should be followed up with written confirmation of conversation. The follow up should contain facts and words used during the conversation. The Safeguarding Lead/Deputy will identify if a section 17 or 47 should be raised in the call and follow up, or:
- Call the police, if the disclosure suggests that a young person or adult at risk is at immediate risk of harm/abuse, or:
- Gather further information from source of the claim. Remember to keep all information factual, sign and date that information, or:

Discuss about action/next steps with the Chief Executive. Advise the Head of Communications in confidence about possible media interest. No comment should be given to the press without authorisation of the Chief Executive.

Action will be taken by Imperial Health Charity based on advice from children's services/MASH/Safeguarding Adults helpline/Police.

Where a member of Imperial Health Charity staff, volunteer or trustee is the subject of an allegation of abuse/safeguarding concern we will follow our processes for handling allegations about staff or volunteers and trustees, as outlined in appendices 1-4 as applicable.

3. Outcome

Where a staff member is dismissed or a volunteer's involvement is ended as a result of a breach of this policy we will report this to the Disclosure & Barring Service and information relating to the individual and

their dismissal will be retained securely by the Charity until their 65th birthday or for 10 years which ever is longer *(NSPCC Child Protection Records Retention and Storage Guidelines, October 2018)*.

A copy of concerns will be added to the person's volunteer/employment file as well as a central record of the concern/action taken.

Records relating to Child Protection, will be kept securely for seven years after the subject(s) reach school leaving age and will be destroyed at their 25th birthday. *(NSPCC Child Protection Records and Storage Guidelines, April 2019)*

Where an incident concerns the involvement of a member of Imperial Health Charity staff, a volunteer, trustee or other associated personnel and the incident is deemed a serious incident requiring reporting by the Charity Commission to them (see list below) we will follow the steps outlined below in Charity Commission Reporting Requirements.

Charity Commission Reporting Requirements

As part of the Board of Trustee's responsibilities, the board is required to inform the Charity Commission of any serious incidents that occur within the organisation as outlined in the commission's serious incident reporting processes. It is requested by the Charity Commission that reports of serious incidents are submitted via email to RSI@charitycommission.gsi.gov.uk

Examples of serious incidents relating to safeguarding which we are required to report to the Charity Commission, as published include:

- A beneficiary or other individual connected with the charity's activities has/alleges to have suffered serious harm
- Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the charity's care
- The Chief Executive of the charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff
- Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer
- A staff computer is found to contain images of child pornography
- An internal investigation has established that there is a widespread culture of bullying within the charity
- A beneficiary or individual connected with the charity's activities has died or been seriously harmed; a significant contributory factor is the charity's failure to implement a relevant policy
- Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position
- Repeated medication errors to beneficiaries in a care home indicating a systemic problem
- Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register
  - o (*Charity Commission, RSI Guidance, Examples table: deciding what to report – Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752170/RSI_guidance_what_to_do_if_something_goes_wrong_Examples_table_deciding_what_to_report.pdf. Accessed March 2019*)

More information about how to report a serious incident to the Charity Commission is available at: https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

Response

Imperial Health Charity will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (as described above).

Imperial Health Charity will apply appropriate disciplinary measures to staff found in breach of policy (see Appendices 1 – Process for Handling Allegations About Imperial Health Charity Staff Concerning Adults At Risk, Appendix 3 - Process for Handling Allegations About Imperial Health Charity Staff Concerning Children and Young People, and Imperial Health Charity Staff Handbook).

Imperial Health Charity will apply appropriate measures according to our Problem Solving procedure of the Volunteering Policy for volunteers found in breach of this policy (see Appendix 2 – Process for Handling Allegations About Imperial Health Charity Volunteers and Trustees Concerning Adults At Risk and Appendix 4 - Process for Handling Allegations About Imperial Health Charity Volunteers and Trustees Concerning Children and Young People).

In the case of trustees and individuals volunteering on governance committees within the charity, Imperial Health Charity will apply appropriate measures in the same way as for volunteers, shown above.

Individuals in receipt of grant funding who are found to be in breach of this policy will be reported to their employer, where they are not already aware, and funding will be managed in accordance with our grant conditions, issued upon award.

Following any incident reported, following the discharge of our responsibilities as outlined in this policy Imperial Health Charity will review the effectiveness of the policy and procedures to be used during the annual policy review and revision process. Where this policy is deemed to be lacking in a specific area based on experience with a live case, we will propose amendments outside of the annual review process.

Key roles with responsibilities for safeguarding

Safeguarding Lead
- Lead responsibility for safeguarding within the charity. This can be delegated to a deputy(s) who are trained, however ultimately the responsibility still sits with the lead.
- Refer cases of concern of a child in need (Section 17, Children's Act, 1989) or adult at risk to the local authority/Multi Agency Safeguarding Hub.
- Refer cases of concern of a child protection issue (Section 47, Children's Act, 1989) to the local authority child social care team/Multi Agency Safeguarding Hub.
- Support staff, volunteers or trustees within the charity with referrals or concerns relating to children and adults at risk.
- Support managers within the Charity to ensure all activities conducted comply with this policy with risks appropriately assessed and managed to ensure the safety of all involved.
- Support the Head of Office in implementation of safer recruitment practices and appropriate procedures.
- Ensure that information related to allegations is effectively recorded, logged and safely stored. Ensure that all files are kept by the charity for the recommended length of time based on published guidance.
- Refer cases where a person is dismissed or left a role due to harm/risk to a child or adult at risk to the Disclosure and Barring Service as required.
- Refer cases where a crime may have been committed to the police as required.
- Liaise with the CEO for any concerns or allegations that involved external organisations such as police, social services etc.

- Liaise with the Board Lead for Safeguarding to ensure that trustees have awareness of any issues, are confident in the charity's policy and procedures for safeguarding and report any reportable serious incidents to the Charity Commission.
- Ensure that training is undertaken every two years for the role covering safeguarding children and adults at risk.
- Share and promote best practice within the organisations work and operations.
- Liaise with relevant Safeguarding Leads within the NHS Trust for any incidents within the NHS Trust's estate
- *Training Requirement: Designated Safeguarding Officer (NSPCC), Safeguarding Adults for Managers (SCIEE), Safeguarding Adults e-learning level 2 (UK Skills for Health), Safeguarding Children and Young People level 2 (UK Skills for Health), Managing adult and child safeguarding in your organisation (NCVO)*

Deputy Safeguarding Lead
- As above. Can deputise for the lead. However, overall responsibility sits with the lead.
- Ensure that training is undertaken every two years for the role covering safeguarding children and adults at risk.
- *Training Requirement: Designated Safeguarding Officer (NSPCC), Safeguarding Adults for Managers (SCIEE), Safeguarding Adults e-learning level 2 (UK Skills for Health), Safeguarding Children and Young People level 2 (UK Skills for Health), Managing adult and child safeguarding in your organisation (NCVO)*

Chief Executive
- In partnership with the board and Safeguarding Lead, ensure the ongoing development and management of the Safeguarding Policy.
- Support the promotion of best practice and appropriate behaviours within the charity's work at all levels and these are understood within the organisation.
- Ensure that training, support and resources are given to staff and volunteers to understanding safeguarding processes and their role.
- Promote and embed safer recruitment practices across the charity's recruitment activities.
- Where necessary, liaise with the NHS Trust's CEO and/or Executive Team around any incidents posing a reputational risk to the NHS Trust.
- *Training Requirement: Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Managing adult and child safeguarding in your organisation (NCVO)*

Board Lead for Safeguarding
- To ensure that the charity reports any serious incidents to the Charity Commission as required.
- Work in partnership with the Safeguarding Lead to review this policy, to confirm that it is fit for purpose and updated with legislative changes at least yearly.
- *Training Requirement: Safeguarding: legal responsibilities for trustees (NCVO), Imperial Health Charity Code of Behaviour briefing*

Chair of Trustees
- To ensure that the charity reports any serious incidents to the Charity Commission as required.
- *Training Requirement: Safeguarding: legal responsibilities for trustees (NCVO), Imperial Health Charity Code of Behaviour briefing*

Trustees
- Approve the Safeguarding Policy
- Discharge their duty of care to the charity, including taking necessary steps to safeguard those at risk from abuse, managing risk and protecting the reputation of the charity
- *Training Requirement: Safeguarding Adults e-learning level 1, Safeguarding Children and Young People level 1, Imperial Health Charity Code of Behaviour briefing*

Head of Office
- Responsible for maintaining safeguarding training records for staff and trustees.
- Ensure that recruiting managers follow safer recruitment practices including appropriate vetting checks.
- Monitor completion of required training for all staff and trustees.
- *Training Requirement: Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour briefing*

Senior Management Team
- Ensure that all activities carried out within their departments comply with the Safeguarding Policy.
- Ensure that all activities carried out within their departments are risk assessed for safety and the protection of children and/or adults at risk, following our Code of Behaviour.
- Ensure that staff understand the relevant reporting procedures based on the location of the activities they are carrying out should a concern/incident/disclosure occur.
- *Training Requirement: Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour briefing*

Line Managers
- Ensure that direct reports understand and are compliant with the Safeguarding Policy, including completion of required training and adherence to our Code of Behaviour.
- Responsible for ensuring all recruitment activity complies with our safer recruitment practices including appropriate vetting checks.
- Ensure that direct reports understand the relevant reporting procedures based on the location of the activities they are carrying out should a concern/incident/disclosure occur.
- *Training Requirement: Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour briefing*

Volunteering Managers
- Ensure that volunteers have completed required safeguarding training.
- Ensure that volunteers understand their responsibilities within the Safeguarding Policy.
- Responsible for ensuring all recruitment activity complies with our safer recruitment practices including appropriate vetting checks.
- Ensure that volunteers adhere to our Code of Behaviour.
- Report any disclosures made to them to the Charity's Safeguarding Lead and via the NHS Trust's reporting procedure.
- *Training Requirement: Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour briefing*

Head of Grants/Grants Manager
- Ensure that grant recipients are given copies of and adhere to our Code of Behaviour and are made aware of our full Safeguarding Policy.
- Ensure that grant applicants complete a safeguarding risk assessment where funding is sought for activities interacting with children or adults at risk.
- Ensure that any incidents, concerns or disclosures are reported according to our reporting procedures.
- *Training Requirement: Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour briefing*

Imperial Health Charity employees, contractors etc who interact with patients and/or children/young people and/or adults at risk in the course of their duties
- Ensure that our Code of Behaviour (Green Card) is followed at all times, and that it is shared with other colleagues and people we are working with so everyone is aware of how we work.
- Ensure that safeguarding risk assessments are in place for all activities involving patients.
- Ensure that any incidents, concerns or disclosures are reported according to our reporting procedures.

- *Training Requirement: Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour briefing*

All other Imperial Health Charity employees, contractors etc… not covered above
- Ensure that our Code of Behaviour (Green Card) is followed at all times, and that it is shared with other colleagues and people we are working with so everyone is aware of how we work.
- Ensure that any incidents, concerns or disclosures are reported according to our reporting procedures.
- *Training Requirement: Safeguarding Adults e-learning level 1, Safeguarding Children and Young People level 1, Imperial Health Charity Code of Behaviour briefing*

All Imperial Health Charity volunteers
- Ensure that our Code of Behaviour (Green Card) is followed at all times, and that it is shared with other colleagues and people we are working with so everyone is aware of how we work.
- Ensure that any incidents, concerns or disclosures are reported according to our reporting procedures.
- *Training Requirement: Volunteer Core Training (which covers the relevant elements of safeguarding within the UK Skills for Health framework and includes Imperial Health Charity Code of Behaviour briefing)*

Recipients of grant funding from Imperial Health Charity
- Ensure that our Code of Behaviour (Green Card) is followed at all times, and that it is shared with other colleagues and people we are working with so everyone is aware of how we work.
- Ensure that any incidents, concerns or disclosures are reported according to our reporting procedures.
- *Training Requirement: Briefing from Grants Team on the Code of Behaviour with reference to this policy and the NHS Trust policies, as appropriate*

Associated policies
- Code of Behaviour (Green Card)
- Anti-Harassment and Bullying Policy
- Whistleblowing policy
- Volunteering Policy
- Privacy Statement *(www.imperialcharity.org.uk/privacy-statement)*
- Recruitment and Selection Policy and Procedure
- Disclosure and Barring Service (DBS) Policy
- Procedures for reporting and response to safeguarding concerns
- Procedures for safeguarding in staff recruitment

Glossary of Terms

At risk adult
Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason 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.

Beneficiary of Assistance/Beneficiaries
Someone who directly receives goods or services from Imperial Health Charity's programme such as hospital patients, visitors and NHS staff. Note that misuse of power can also apply to the wider

community that Imperial Health Charity serves, and also can include exploitation by giving the perception of being in a position of power.

Child
A person below the age of 18.

Domestic Abuse
Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.

Female Genital Mutilation (FGM)
Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is abuse. It's dangerous and a criminal offence in the UK.

Harm
Psychological, physical and any other infringement of an individual's rights.

Neglect
Neglect is the ongoing failure to meet a child's or adult at risk's basic needs. An individual may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care.

Physical Abuse
Physical abuse is deliberately hurting an individual causing injuries such as bruises, broken bones, burns or cuts.

Psychological harm/Emotional abuse
Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Protection from Sexual Exploitation and Abuse (PSEA)
The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).

Safeguarding
Safeguarding means protecting a citizen's health, wellbeing and human rights; enabling them to live free from harm, abuse and neglect. It is an integral part of providing high-quality health care. Safeguarding children, young people and adults is a collective responsibility.
(https://www.england.nhs.uk/safeguarding/about/)

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse
When an individual is forced or persuaded to take part in sexual activities. This doesn't have to be physical contact, and it can happen online.

Sexual exploitation
The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially

or politically from the sexual exploitation of another. This definition incudes human trafficking and modern slavery.

Survivor
The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult
Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason 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.

Appendix 1 - Process for Handling Allegations About Imperial Health Charity Staff Concerning Adults At Risk

Allegation made – Record all facts as disclosed

Is there an immediate risk of harm to an individual?

— YES →
- Call 999
- Undertake actions as advised by the Police/authorities
- Record actions/advice that has been taken/followed. Records to be updated by Safeguarding Lead/Deputy

NO ↓

Does the allegation relate to a potentially criminal act?

— YES →
Call the Police via non urgent channels. Undertake actions as advised by Police/authorities. Record actions/advice that has been taken/followed. Records to be updated by Safeguarding Lead/Deputy

NO →

Do the following three apply to the adult claiming abuse?
- has care and support needs
- experiencing or at risk of, abuse or neglect
- is unable to protect themselves due to care and support needs?

— NO → **Section 42 does not apply. Record locally and undertake local action**

— YES →

Does the adult give consent to share their information?/ Do they have capacity to give consent?

— NO → **No more action can be taken.**

— YES ↓

Record all the information and raise a section 42 with the local authority.

Did the incident take place on the NHS Trust estate?

— YES → **Contact the Trust Adults Safeguarding Team and follow advice provided**

— NO ↓

Inform Charity CEO as soon as possible

↓

Arrange meeting with staff member within one working day of report

↓

Inform staff member's line manager as appropriate

↓

Interview staff member, record interview notes, sign and date them

↓

Consult and action staff disciplinary procedures

↓

Remove ID and access, suspend staff member with agreement from CEO

→ **Does the incident meet the Charity Commission's RSI threshold?**

— YES → **Inform Chair of Trustees and Lead Trustee for Safeguarding**

— NO ↓

Is there any potential anticipated media interest?

— YES → **Brief Head of Communications**

— NO ↓

Carry out any actions advised by the Local Authority, Police or other statutory agencies

↓

Is the allegation upheld?

— NO → **Carry out risk assessment with line manager, HR, Safeguarding Lead/Deputy**

— YES ↓

Is a criminal prosecution being sought?

— NO → **Has there been a breach of Charity policy/procedure?**

— YES ↓ (criminal prosecution)

Has there been a breach of Charity policy/procedure?
— YES → **Follow staff disciplinary procedures**
— NO → **Carry out risk assessment with line manager, HR, Safeguarding Lead/Deputy**

Carry out risk assessment with line manager, HR, Safeguarding Lead/Deputy — EITHER → **Suspension is lifted, staff member returns to work. Relevant managers are informed.**

- Training required
- Additional supervision/support for their role put in place
- Tasks and responsibilities reviewed and revised where required
- Staff member is dismissed

Appendix 2 - Process for Handling Allegations About Imperial Health Charity Volunteers and Trustees* Concerning Adults At Risk

read volunteer as volunteer/trustee

Allegation made – Record all facts as disclosed

- Call 999
- Undertake actions as advised by the Police/authorities
- Record actions/advice that has been taken/followed. Records to be updated by Safeguarding Lead/Deputy

Is there an immediate risk of harm to an individual? — YES

Does the allegation relate to a potentially criminal act? — NO

Do the following three apply to the adult claiming abuse?
- has care and support needs
- experiencing or at risk of, abuse or neglect
- is unable to protect themselves due to care and support needs? — NO

Section 42 does not apply. Record locally and undertake local action

NO

Inform Charity CEO as soon as possible

Did the incident take place on the NHS Trust estate?

YES — Call the Police via non urgent channels. Undertake actions as advised by Police/authorities. Record actions/advice that has been taken/followed. Records to be updated by Safeguarding Lead/Deputy

YES

Does the adult give consent to share their information?/ Do they have capacity to give consent?

No more action can be taken. — NO

YES

Arrange meet with volunteer within one working day of report

Contact the Trust Adults Safeguarding Team and follow advice provided

Inform relevant Volunteering Manager and Volunteer Supervisor as appropriate

Record all the information and raise a section 42 with the local authority.

Interview volunteer, record interview notes, sign and date them

Follow Problem Solving process in Volunteering Policy

Suspend volunteer pending investigation. Remove ID and access.

Does the incident meet the Charity Commission's RSI threshold? — YES — Inform Chair of Trustees and Lead Trustee for Safeguarding

NO

Brief Head of Communications — YES — Is there any potential anticipated media interest?

NO

Carry out any actions advised by the Local Authority, Police or other statutory agencies

In the case of Trustees:

Read volunteer as volunteer/trustee

The Chair, CEO and Safeguarding Lead will carry out any risk assessment required when handling a trustee returning from a period of suspension.

Is the allegation upheld? — NO — Carry out risk assessment with Volunteering Manager, Volunteer Supervisor, Safeguarding Lead/Deputy — EITHER — Suspension is lifted, volunteer returns to role. Relevant managers are informed.

YES

NO

Volunteer is reassigned to a different role

Is a criminal prosecution being sought? — NO — Has there been a breach of Charity policy/procedure? — YES — Follow Problem Solving process in Volunteering Policy

Additional training/briefing/supervision/support for their role put in place

YES

Volunteer's involvement is ended (either in that role or entirely)

Appendix 3 - Process for Handling Allegations About Imperial Health Charity Staff Concerning Children and Young People

Allegation made – Record all facts as disclosed

Is there an immediate risk of harm to a child?

YES →
- Call 999
- Undertake actions as advised by the Police/authorities
- Record actions/advice that has been taken/followed. Records to be updated by Safeguarding Lead/Deputy

NO ↓

Does the allegation relate to a potentially criminal act?

YES → **Call the Police via non urgent channels. Undertake actions as advised by Police/authorities. Record actions/advice that has been taken/followed. Records to be updated by Safeguarding Lead/Deputy**

NO →

Assess the known facts in line with the LSCB Referrals Indicator Matrix, Refer to MASH where facts meet one of the referable indicators

Is it RED: Serious Safeguarding concern, immediate action required?

YES → **Take action based on LADO advice**

NO → **Is it AMBER: Significant concern, no immediate urgent action required by S47 investigation?**

YES → Take action based on LADO advice

NO → **Is it GREEN: Concerns about a child's wellbeing, may consider S17 Child in Need?**

YES → Take action based on LADO advice

NO → **Is it BLUE: No safeguarding risk identified?**

YES → **No referral needed, undertake internal action**

Did the incident take place on the NHS Trust estate?

YES → **Contact the Trust's Safeguarding Children and Young People Team and follow advice provided**

NO →

Inform Charity CEO as soon as possible

↓

Arrange meeting with staff member within one working day of report

↓

Inform staff member's line manager as appropriate

↓

Interview staff member, record interview notes, sign and date them

↓

Consult and action staff disciplinary procedures

↓

Remove ID and access, suspend staff member with agreement from CEO

→ **Does the incident meet the Charity Commission's RSI threshold?**

YES → **Inform Chair of Trustees and Lead Trustee for Safeguarding**

NO → **Is there any potential anticipated media interest?**

YES → **Brief Head of Communications**

NO → **Carry out any actions advised by the Local Authority, Police or other statutory agencies**

↓

Is the allegation upheld?

NO → **Carry out risk assessment with line manager, HR, Safeguarding Lead/Deputy**

YES → **Is a criminal prosecution being sought?**

NO → **Has there been a breach of Charity policy/procedure?**

YES → **Follow staff disciplinary procedures**

NO → **Carry out risk assessment with line manager, HR, Safeguarding Lead/Deputy**

YES (criminal prosecution) → **Follow staff disciplinary procedures**

Carry out risk assessment with line manager, HR, Safeguarding Lead/Deputy → EITHER → **Suspension is lifted, staff member returns to work. Relevant managers are informed.**

- **Training required**
- **Additional supervision/support for their role put in place**
- **Tasks and responsibilities reviewed and revised where required**
- **Staff member is dismissed**

Appendix 4 - Process for Handling Allegations About Imperial Health Charity Volunteers and Trustees Concerning Children and Young People

read volunteer as volunteer/trustee

Allegation made – Record all facts as disclosed

Assess the known facts in line with the LSCB Referrals Indicator Matrix, Refer to MASH where facts meet one of the referable indicators

Is it RED: Serious Safeguarding concern, immediate action required? — NO

- Call 999
- Undertake actions as advised by the Police/authorities
- Record actions/advice that has been taken/followed. Records to be updated by Safeguarding Lead/Deputy

Is it AMBER: Significant concern, no immediate urgent action required by S47 investigation? — NO

Is there an immediate risk of harm to a child? — YES

Does the allegation relate to a potentially criminal act?

YES (from RED)

Is it GREEN: Concerns about a child's wellbeing, may consider S17 Child in Need? — YES / NO

NO

Did the incident take place on the NHS Trust estate?

Call the Police via non urgent channels Undertake actions as advised by Police/authorities Record actions/advice that has been taken/followed. Records to be updated by Safeguarding Lead/Deputy

Is it BLUE: No safeguarding risk identified?

Inform Charity CEO as soon as possible

YES

Take action based on LADO advice

YES

Arrange meeting with volunteer within one working day of report

Contact the Trust's Safeguarding Children and Young People Team and follow advice provided

No referral needed, undertake internal action

Inform relevant Volunteering Manager and Volunteer Supervisor as appropriate

Interview volunteer, record interview notes, sign and date them

Follow Problem Solving process in Volunteering Policy

Suspend volunteer pending investigation. Remove ID and access.

Does the incident meet the Charity Commission's RSI threshold? — YES

Inform Chair of Trustees and Lead Trustee for Safeguarding

NO

Brief Head of Communications — YES

Is there any potential anticipated media interest?

NO

Carry out any actions advised by the Local Authority, Police or other statutory agencies

Is the allegation upheld? — NO

Carry out risk assessment with Volunteering Manager, Volunteer Supervisor, Safeguarding Lead/Deputy — EITHER

Suspension is lifted, volunteer returns to role. Relevant managers are informed.

Volunteer is reassigned to a different role

YES

NO

Is a criminal prosecution being sought? — NO

Has there been a breach of Charity policy/procedure? — YES

Additional training/briefing/supervision/support for their role put in place

YES

Follow Problem Solving process in Volunteering Policy

Volunteer's involvement is ended (either in that role or entirely)

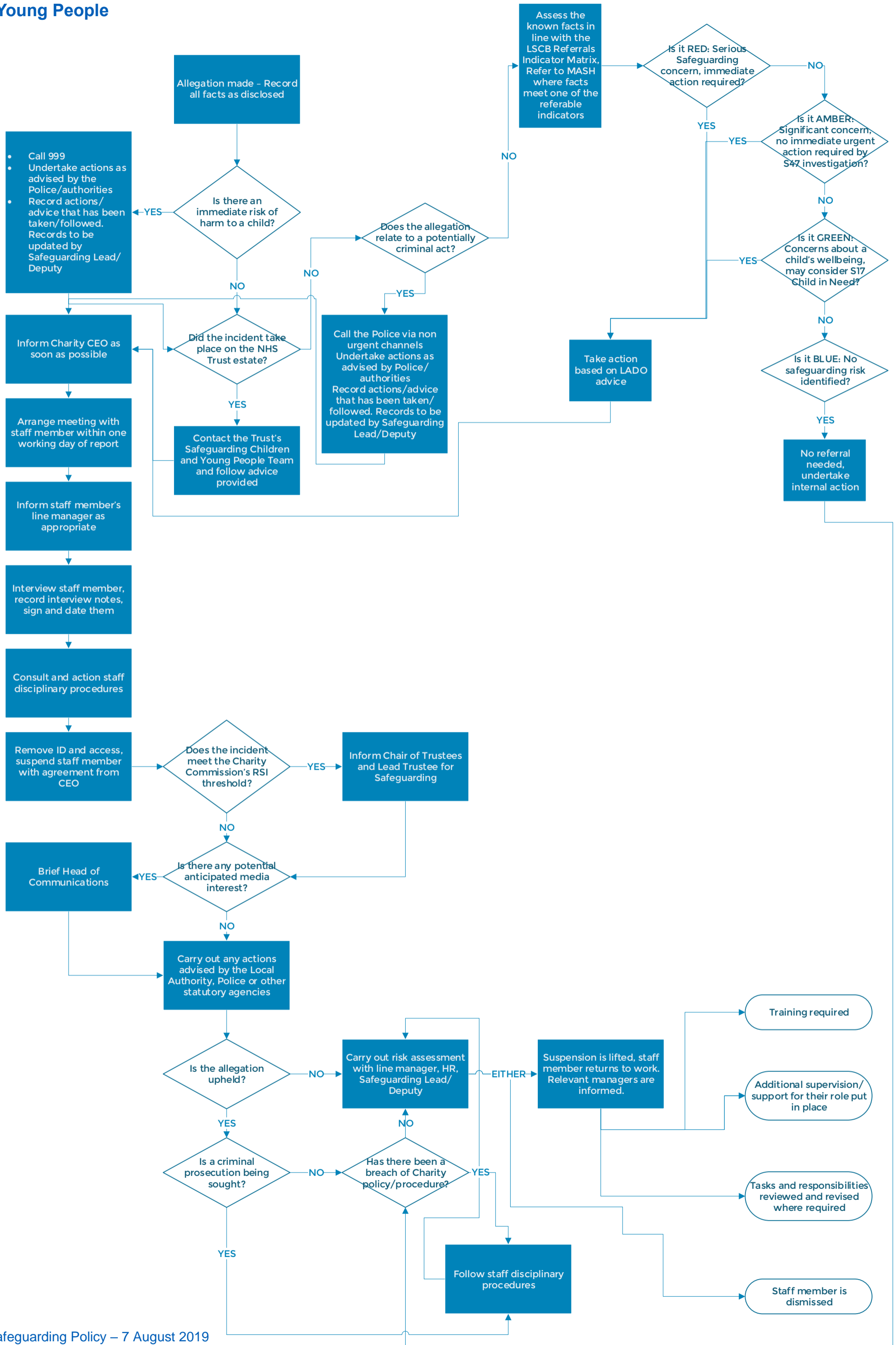**In the case of Trustees:**

Read volunteer as volunteer/trustee

The Chair, CEO and Safeguarding Lead will carry out any risk assessment required when handling a trustee returning from a period of suspension.