

Imperial Health Charity

Safeguarding Policy



HELPING
OUR HOSPITALS
DO MORE

Added below

Version	3.0
Last Updated	January 2024
Review Date	January 2026
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POLICY STATEMENT

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

Our main activities take place in hospitals within the Imperial College Healthcare NHS Trust (the trust) and our local north-west London community, and involve patients, visitors, staff and members of the general public (including children and young people, as well as adults at risk). As such, we appreciate that you will regularly come into contact with some of the most vulnerable groups within our society.

We understand how important it is that everyone who works on our behalf follows our code of behaviour and can identify and raise concerns about an individual's safety. Within hospitals, our staff, volunteers, trustees and others who work on our behalf must keep to the trust's policies and reporting procedures for safeguarding children, young people and adults at risk.

This policy sets out how we expect you to help us meet our obligations to recognise and report harm or suspected harm, both as an independent charity and a partner operating within the trust and under their safeguarding policies and procedures. Our code of behaviour (our Green Card) sets out the behaviour we expect from you and is designed to create a culture of transparency and safety. This will make sure that, as well as protecting people from harm, no one is put in a position where an allegation of inappropriate behaviour can be made against them.

We are committed to addressing safeguarding throughout our work, through the three 'pillars' of prevention, reporting and response.

We will not tolerate abuse and exploitation by our staff, volunteers, trustees or anyone else who works on our behalf.

This policy does not cover:

- sexual harassment in the workplace – this is dealt with under our Anti-Bullying and Harassment Policy.

WHAT IS SAFEGUARDING?

Safeguarding means protecting a person's health, wellbeing and human rights, so that they can live free from harm, abuse and neglect. It is an essential part of providing high-quality health care. Safeguarding children, young people and adults is everyone's responsibility. (<https://www.england.nhs.uk/safeguarding/about/>)

As a charity within the health sector, our aim is to:

1. protect people, including children and adults at risk, from harm that arises from coming into contact with us and our activities; and
2. protect you from allegations by creating a culture of transparency and safety around the behaviour we expect from you.

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' (Adult Safeguarding Pocket Guide – NHS England, 2023).

There are more definitions relating to safeguarding, including types of harm and abuse, in the [glossary](#).

WHO THIS POLICY APPLIES TO

- All staff working on our behalf, including those on permanent, fixed-term or casual contracts.
- All volunteers we appoint and who work on our behalf.
- All trustees we appoint and who work on our behalf, including members of our subcommittees and advisory groups.
- Anyone else who works with or visits us. This includes, but is not limited to, consultants, contractors, workshop or training providers and programme visitors (including journalists, celebrities and politicians).
- Individuals, groups and organisations who benefit from, or are involved in, our grant-funded projects or initiatives.

PREVENTION

1 Our Code of Behaviour – Keeping People Safe (Our Green Card)

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

Everyone who works with us or on our behalf will be given a copy of our code of behaviour.



We believe that all staff, volunteers, trustees and anyone else who works for or with us, or receives grant funding from us, should support what we do, follow 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 experience abuse of any kind, whatever their age, disability, gender, religious belief, race, sexual orientation or identity. This includes, but is not limited to, neglect and physical, sexual and emotional abuse.

1.1 The code

- **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 and health and safety arrangements for your location
- **Do** provide excellent customer service and do your best to make sure 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 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** drink 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** take part 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 or adults at risk involved in our work by forming friendships or sexual relationships
- **Do not** allow activities that encourage bullying, including initiation ceremonies, dares or forfeits
- **Do not** behave in a way which could damage our reputation or that of the 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.

If you do not keep to our code of behaviour, we will deal with this through formal discussions, as follows.

- Staff members will meet for discussions with line managers or department heads
- Volunteers will meet with volunteering managers
- Trustees will meet with our Chair or Chief Executive (or both)



- Anyone else who works on our behalf will meet with whoever is their main contact with us
- Grant beneficiaries will meet with our Head of Grants or Grants Manager
- The Chair of Trustees will meet with a panel of the Chief Executive and at least two other trustees
- The Chief Executive will meet with a panel of the Chair of Trustees and at least two other trustees

These discussions will be recorded, signed and dated, and kept safe.

2 Our Responsibilities

We will do the following.

- Make sure you have access to, and are familiar with, this policy and know your responsibilities under it and our code of behaviour.
- Make sure that when you are working in the trust's hospitals, you are familiar with the trust's policy and reporting procedure for safeguarding children, young people and adults.
- Design and carry out all our programmes and activities in a way that protects people from any risk of harm that may arise from coming into contact with us. This includes how we collect and communicate information about individuals in our programmes.
- Have in place robust safeguarding procedures when recruiting, managing and deploying staff, volunteers and anyone else who works on our behalf.
- Make sure you receive training on safeguarding at a level based on your role.
- Follow up reports of safeguarding concerns promptly and follow our processes and procedures when acting on information we are given.
- Make sure that people involved in grant-funded projects or initiatives are given copies of our code of behaviour and made aware of its importance.

3 Staff and Volunteer Responsibilities

3.1 Safeguarding Children

You must not:

- take part in sexual activity with anyone under the age of 18, who has a connection to our work or the trust (or both);
- sexually abuse or exploit children;



- subject a child to physical, emotional or psychological abuse, or neglect;
- take part in any activities with children, including child labour or trafficking, that could commercially exploit them; or
- trivialise abuse or not report any of the above.

3.2 Safeguarding Adults

You must not:

- sexually abuse or exploit adults at risk;
- subject an adult at risk to physical, emotional or psychological abuse, or neglect;
- take part in any activities with adults at risk, including slave labour or trafficking, that could commercially exploit them; or
- trivialise abuse or not report any of the above.

3.3 Protection from Sexual Exploitation and Abuse

You must not:

- exchange money, employment, goods or services for sexual activity; or
- have sexual relationships with beneficiaries.

3.4 General Responsibilities

You must:

- help create a safe environment for everyone who works for us or with us, and allow us to raise and investigate concerns;
- promote this policy, including the day-to-day use of our code of behaviour;
- report, to the Safeguarding Lead or their deputies, any concerns or suspicions you have about a staff member, volunteer, trustee or anyone else who works on our behalf breaking our code of behaviour (or, if your concern is about the Safeguarding Lead or their deputies, raise it with the Head of Office or the Chief Executive); and
- report, to the Trust Safeguarding Team, any concerns or suspicions regarding abuse that you observe within the trust or by trust staff.

REPORTS

We will make sure that our staff and the communities we work with have safe, appropriate and accessible methods of reporting safeguarding concerns.

If you report concerns or complaints through the formal whistleblowing channels, you will be protected by our Whistleblowing Policy (if you request this).

We also accept complaints from members of the public, partners and official bodies. In an emergency or a life-threatening situation we recommend that you first contact 999.

1 How to Report a Safeguarding Concern

Our main purpose is to support and work in partnership with the trust. We are currently mainly based within Charing Cross, Hammersmith, Queen Charlotte's & Chelsea, St Mary's and Western Eye hospitals and the wider north-west London community. A lot of our charitable activities take place within these hospitals, renal centres, community diagnostics centres or our local community, and relate to patients and their visitors, hospital staff and hospital facilities. If your concern is about someone within one of the trust's hospitals, you should follow the trust's reporting policies and procedures. (See [Reporting Procedure for incidents/disclosures in NHS hospitals.](#))

2 Online Reporting

We recognise that abuse can be carried out online, so we include the CEOP (Child Exploitation and Online Protection Command) reporting button throughout our website. This button allows you to report concerns relating to online abuse of children quickly and easily. (See www.ceop.police.uk/safety-centre for more information.)

3 Confidentiality

Due to the sensitive nature of safeguarding concerns, all stages of the process must be confidential. You should only share information about your concern and how it is managed with those who need to know, and the information should be kept secure at all times.

You should not share information or ask for advice about safeguarding during 'corridor conversations' as this is not helpful to good communication, listening or confidentiality. Whenever possible, find a suitable private area to continue the discussion. (Safeguarding Children, Young People & Unborn Operational Policy, Imperial College London Healthcare NHS Trust, March 2023)

Senior managers and trustees will only be given information relating to safeguarding concerns if appropriate on a 'need to know' basis, and will not be given updates.

We will manage information relating to our staff, volunteers, trustees and anyone else who works on our behalf, or about any incidents or information shared relating to safeguarding, according to our Privacy Statement. This is available online at www.imperialcharity.org.uk/privacy-statement.



REPORTING INCIDENTS IN NHS HOSPITALS

The following reporting procedure follows the trust's safeguarding policies and procedures.

1 Make a Report

You should follow the same policy as NHS staff and report any safeguarding concerns observed or shared within the trust's hospitals to your line manager. In their absence, report it to a Duty Manager or Senior Nurse, depending on the service or location.

You must take the following steps.

1.1 Recognise Abuse or Suspected Abuse

- You might directly observe the abuse taking place or have evidence that it has taken place.
- You might receive a complaint about any form of abuse.
- The person who has been abused or is at risk of abuse might share the information with you.

1.2 Keep the Person Safe

- If they are 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.

1.3 Make a Note of what You Have Heard and Observed

If someone shares a safeguarding concern directly with you, you should bear the following in mind.

- Listen, allow them to speak without interrupting, and accept what they say.
- Be understanding and reassuring – do not give your opinion.
- Tell them you will try to help but that you must pass the information on – do not promise complete confidentiality.
- Ask who, when, where and what, but not why.
- Repeat what they have told you or check you have understood the situation.



Note down any observations, concerns or anything anyone has shared with you directly. Make

sure you include the following.

- The name of the person reporting the harm or abuse.
- The name (or names) of the survivor (the person who has allegedly been abused or exploited), if different from above.
- The name (or names) of the perpetrator (the person who is alleged to have carried out the harm or abuse).
- A description of the incident (or incidents).
- Dates, times and locations of incidents.

Some services within the trust will have an incident report form you can use for this.

1.4 Pass on Your Concerns

As soon as you have a concern about a child or adult at risk, you should do the following.

- Report the incident to the NHS trust manager for the area, or the relevant Trust Safeguarding Team. The Trust Safeguarding Team provide a service seven days a week, from 9am to 5pm. Outside of these hours, contact the relevant site office, as follows.
 - Children and Young People Safeguarding Team: 020 3312 5173 or bleep 1178 (imperial.safeguarding.children@nhs.net)
 - Adult Safeguarding Team: 020 3312 5173 or 07825 218451 or bleep 1174 (imperial.safeguarding.adults@nhs.net)
 - Bleep 1172 for learning disability and autism safeguarding advice
 - Bleep 1176 for safeguarding maternity advice
 - Bleep 1179 for domestic abuse and modern slavery exploitation advice
- You must also send a copy of the report to our Safeguarding Lead at safeguarding@imperialcharity.org.uk within 24 hours of making the initial report to the trust.
- The Charity Safeguarding Team are available Monday to Friday, 9am to 5pm, by contacting safeguarding@imperialcharity.org.uk.

2 Action Is Taken by the Trust

The trust will take appropriate action, liaising with us if appropriate (for example, if one of our staff, volunteers, trustees or anyone who works on our behalf is implicated in any report). It is the trust's responsibility to deal appropriately with reports, according to their policies and procedures.

We will make a record in the safeguarding log and follow any instructions from the trust, following our procedures in the appendices (see page < >) if necessary.

We will take action based on advice from the trust's Safeguarding Teams or government agencies (or both).

If you are the subject of an allegation of abuse or a safeguarding concern, we will follow our processes for handling allegations about staff or volunteers and trustees, as in appendices 1 to 4 within appendices.

3 Outcome

If a report does not implicate someone working on our behalf, we may not be told the outcome due to confidentiality. If we do receive an update, we will record it in our safeguarding log.

If we dismiss a member of staff or end a volunteer's involvement due to them not keeping to this policy, we will report this to the Disclosure and Barring Service. We will keep information relating to the member of staff or volunteer and their dismissal safely until their 65th birthday or for 10 years, whichever is longer. (NSPCC Child Protection Records Retention and Storage Guidelines, September, 2023.)

We will add a copy of concerns to the person's volunteer or employment file and keep a central record of the concern or the action taken (or both).

Records relating to child protection will be kept securely for seven years after the child reaches school leaving age and will be destroyed on their 25th birthday. (NSPCC Child Protection Records and Storage Guidelines, September, 2023.)

If a member of our staff, volunteer, trustee or anyone else who works for us or on our behalf is involved in an incident which is considered serious enough to report to the Charity Commission, we will follow the steps in the [Charity Commission Reporting Requirements](#) as outlined on the charity commission website.



REPORTING INCIDENTS THAT TAKE PLACE ON OUR PREMISES, IN THE NORTH-WEST LONDON COMMUNITY, OR NOT ON TRUST PROPERTY

1 You Make a Report

You can make a report by letter, e-mail, text or a message on social media, or you can have an informal discussion with someone or tell someone about a rumour. If you hear something in an informal discussion or chat that you think is a safeguarding concern, you should report this to our Safeguarding Lead or their deputies.

You must take the following steps.

1.1 Recognise Abuse or Suspected Abuse

- You might directly observe the abuse taking place or have evidence that it has taken place.
- You might have been told or received information about a concern for an adult at risk or child.
- The person who has been abused or is at risk of abuse might share information with you.

1.2 Keep the Person Safe

- If they are 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.

1.3 Make a Note of what You Have Heard and Observed

If someone shares a safeguarding concern directly with you, you should bear the following in mind.

- Listen, allow them to speak without interrupting them, and accept what they say.
- Be understanding and reassuring – do not give your opinion.
- Tell them you will try to help but that you must pass the information on – do not promise complete confidentiality.
- Ask who, when, where and what, but not why.



- Repeat what they have told you or check you have understood the situation.

Use our incident report form to note any observations, concerns or information that has been shared with you directly. Make sure you record the following.

- The name of the person making the report.
- The name (or names) of the survivor (the person who has allegedly been abused or exploited), if different from the above.
- The name (or names) of the perpetrator (the person who is alleged to have carried out the harm or abuse).
- A description of the incident (or incidents).
- Dates, times and locations of the incident.

1.4 Report the Incident or Concern

- Report the incident or concern to our Safeguarding Lead, Chris Neal. Or if they are not available, to deputies Jarina Choudhury or Sam Shepherd on 020 3857 9848 or at safeguarding@imperialcharity.org.uk immediately.

If you do not feel comfortable reporting to our Safeguarding Lead or deputies (for example, if you think the report will not be taken seriously or if you are implicated), you can report to our Head of Office or, failing that, our Chief Executive.

- Head of Office: Louise.Stephens@imperialcharity.org.uk
- Chief Executive: Ian.Lush@imperialcharity.org.uk
- Also, you can report any concerns or ask for advice relating to children and young people (aged under 18) through the NSPCC helpline on 0808 800 5000.

If you are not satisfied that we are dealing with your report appropriately, you have a right to take the report further, either to the Chief Executive, the Chair of Trustees, or a government body. You will be protected against any negative repercussions as a result of this report. See our Whistleblowing Policy.

2 We Take Action

The Safeguarding Lead or their deputies will review and record your report and will contact one of the below for advice or action within 48 hours of receiving

it. The call must be followed up in writing and include the details of the person you have spoken to and the concerns they have raised.

- Hammersmith and Fulham: Adults: Community Response and Reablement Team: 0800 145 6095 or 020 87488588 (out of hours) or safeguardingadults@lbhf.gov.uk.
- Hammersmith and Fulham: Children: Initial Consultation and Advice Team (ICAT) 020 8753 6600 or familyservices@lbhf.gov.uk. Local Area Designated Officer: Lado@lbhf.gov.uk or 020 87535125.
- Westminster: Adults: 020 76412176 or Adultsocialcare@westminster.gov.uk
- Westminster Children and young people: The follow-up should contain facts and words used during the conversation. The Safeguarding Lead or their deputies will identify if a section 17 or 47 action should be raised in the call and follow-up.
- The police, if the information shared suggests that a child or adult at risk is at immediate risk of harm or abuse (or both).
- Collect more information from whoever has made the claim. Remember to keep all information factual and sign and date it.

Discuss the next steps with the Chief Executive. Advise the Head of Communications in confidence about possible media interest. Do not make any comment to the press without the authorisation of the Chief Executive.

We will take action based on advice from children's services, the multi-agency safeguarding hub, the Safeguarding Adults helpline or the police.

If a member of our staff, volunteer or trustee is the subject of an allegation of abuse or a safeguarding concern, we will follow our processes for handling these allegations, as set out in appendices 1 to 4.

3 Outcome

If we dismiss a member of staff or end a volunteer's involvement with us because they have not kept to this policy, we will report this to the Disclosure and Barring Service. We will keep information relating to the person and their dismissal safely until their 65th birthday or for 10 years, whichever is longer. (NSPCC Child Protection Records Retention and Storage Guidelines, September 2023.)

We will add a copy of concerns to the person's volunteer or employment file and keep a central record of the concern or action taken.

We will keep records relating to child protection securely for seven years after the child reaches school leaving age and destroy them on their 25th birthday. (NSPCC Child Protection Records and Storage Guidelines, September 2023.)



HELPING
OUR HOSPITALS
DO MORE

If an incident involving a member of our staff, volunteer, trustee or anyone else who works on our behalf is considered serious enough to report to the Charity Commission (see the list below), we will follow the steps set out below in the [*Charity Commission Reporting Requirements*](#).

OUR RESPONSE

We will follow up safeguarding reports and concerns according to our policy and procedure and legal duties (as described above).

1 Staff

We will take appropriate disciplinary measures if staff do not keep to our policy. (See appendices 1 and 3 and our staff handbook.)

2 Volunteers

If you are a volunteer and you do not keep to our policy, we will take appropriate measures under the problem-solving procedure of our Volunteering Policy. (See appendices 2 and 4.)

3 Trustees and Governance Committees

In the case of trustees and individuals who volunteer on our governance committees, we will take appropriate measures in the same way as for volunteers, shown above.

4 Grants

If you have received grant funding from us and do not keep to this policy, we will report it to your employer (if they are not already aware) and manage the funding in line with our grant conditions (which you are given when your grant is issued).

5 Contractors, Including Arts Facilitators

If you are contracted to work on our behalf and do not keep to this policy, we will review your contract and take action, depending on how serious the incident is. (See appendices 1 and 3, and our staff handbook.)

Once an incident has been reported and we have dealt with it under this policy, we will review how effective our policy and procedures are during our annual policy review and revision process.

If we find this policy is lacking in a specific area, based on experience with a live case, we will propose that we amend it when appropriate (and not necessarily wait for the annual review).

KEY ROLES WITH RESPONSIBILITIES FOR SAFEGUARDING

1 Safeguarding Lead

- Has lead responsibility for safeguarding. This can be delegated to a trained deputy (or deputies), but the lead has overall responsibility.
- Refers concerns regarding a child in need (section 17, Children's Act 1989) or adult at risk to the local authority or multi-agency safeguarding hub. Refers concerns regarding a child-protection issue (section 47, Children's Act 1989) to the local authority child social-care team or multi-agency safeguarding hub.
- Supports our staff, volunteers or trustees with referrals or concerns relating to children and adults at risk.
- Supports our managers to make sure all our activities keep to this policy and that risks are appropriately assessed and managed to guarantee the safety of everyone involved.
- Supports the Head of Office to put in place safer recruitment practices and appropriate human resources practices.
- Makes sure that information about allegations is effectively recorded and safely stored. Makes sure that we keep all files for the recommended length of time based on published guidance.
- Refers cases to the Disclosure and Barring Service when a person is dismissed or has left a role due to causing harm or risk to a child or adult at risk.
- Where necessary, refers cases when a crime may have been committed to the police.
- Liaises with the Chief Executive on any concerns or allegations that involve outside organisations, such as the police or social services.
- Liaises with the Board Lead for Safeguarding to make sure that trustees are aware of any issues, are confident in our policy and procedures for safeguarding and report any serious incidents to the Charity Commission.
- Makes sure there is training every two years for roles that cover safeguarding children and adults at risk.
- Shares and promotes best practice within our work and operations.
- Liaises with relevant Safeguarding Leads within the trust for any incidents within the trust's buildings or land.



- Training requirement – Designated Safeguarding Officer (NSPCC), Safeguarding Adults for Managers (SCIEE), Safeguarding Adults e-learning level 2 (e-learning for Health), Safeguarding Children and Young People level 2 (e-learning for Health), Managing adult and child safeguarding in your organisation (NCVO).

2 Deputy Safeguarding Lead

- As above. Can deputise for the lead, but the lead has overall responsibility.
- Makes sure there is training every two years for roles that cover safeguarding children and adults at risk.
- Training requirement – Designated Safeguarding Officer (NSPCC), Safeguarding Adults for Managers (SCIEE), Safeguarding Adults e-learning level 2 (e-learning for Health), Safeguarding Children and Young People level 2 (e-learning for Health), Managing adult and child safeguarding in your organisation (NCVO).

3 Chief Executive

- Develops and manages this policy, in partnership with the board and the Safeguarding Lead.
- Supports best practice and appropriate behaviour in our work at all levels and makes sure these are understood within the organisation.
- Makes sure that staff and volunteers have the training, support and resources to help them understand safeguarding processes and their role.
- Promotes and establishes safer practices across our recruitment activities.
- When necessary, liaises with the trust's CEO or Executive Team (or both) on any incidents that could risk the trust's reputation.
- Training requirement – Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Managing adult and child safeguarding in your organisation (NCVO).

4 Board Lead for Safeguarding

- Makes sure that we report any serious incidents to the Charity Commission as required.
- Works in partnership with the Safeguarding Lead to review this policy, confirm it is fit for purpose and update it with any changes to legislation at least once a year.
- Training requirement – Safeguarding: legal responsibilities for trustees (NCVO), Imperial Health Charity Code of Behaviour.

5 Chair of Trustees

- Makes sure that we report any serious incidents to the Charity Commission as required.
- Training requirement – Safeguarding: legal responsibilities for trustees (NCVO), Imperial Health Charity Code of Behaviour.

6 Trustees

- Approve this policy.
- Carry out their duty of care to us, including taking necessary steps to safeguard those at risk from abuse, manage risk and protect our reputation.
- Training requirement – Safeguarding Adults e-learning level 1, Safeguarding Children and Young People level 1, Imperial Health Charity Code of Behaviour.

7 Head of Office

- Keeps safeguarding training records for staff and trustees.
- Makes sure that recruiting managers follow safer recruitment practices, including appropriate vetting checks.
- Monitors whether required training for all staff and trustees has been completed.
- Training requirement – Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour.

8 Senior Management Team

- Make sure that all programmes of work and business activities within their departments keep to this policy.
- Make sure that all activities within their departments are risk-assessed for safety and the protection of children or adults at risk and that our code of behaviour is followed.
- Make sure that staff understand the reporting procedures that apply where they are working, if there is a concern or incident or information is shared with them.
- Training requirement – Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour.

9 Line Managers

- Make sure that staff and contractors understand and keep to this policy, including completing training and keeping to our code of behaviour.
- Are responsible for making sure all staff who work in recruitment keep to our safer recruitment practices, including appropriate vetting checks.
- Make sure that staff and contractors understand the reporting procedures that apply where they are working, if there is a concern or incident or information is shared with them.
- **Training requirement – Safeguarding Adults e-learning level 2, Safeguarding Children and Young People level 2, Imperial Health Charity Code of Behaviour.**

10 Volunteering Managers

- Make sure that volunteers have completed the required safeguarding training.
- Make sure that volunteers understand their responsibilities under this policy.
- Are responsible for making sure that safer recruitment practices, including appropriate vetting checks, are kept to.
- Make sure that volunteers keep to our code of behaviour.
- Report any information shared with them to the Safeguarding Lead and through the 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.**

11 Head of Grants and Grants Manager

- Make sure that anyone who receives a grant from us is given a copy of our code of behaviour and keeps to it, and is made aware of this full Safeguarding Policy.
- Make sure that grant applicants complete a safeguarding risk assessment if they are applying for funding for activities that involve interacting with children or adults at risk.
- Make sure that any incidents, concerns or shared information 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.**

12 Arts Engagement Manager and Head of Arts

- Makes sure that arts facilitators complete safeguarding adults and children training before carrying out any work on our behalf and understand what their responsibilities are under this policy.
- Make sure that arts contractors and facilitators are issued with our code of behaviour before starting any work on our behalf.
- Make sure that all staff involved in the recruitment for contractors and facilitators keep to the safer recruitment practices and appropriate vetting checks.
- Make sure that safeguarding risk assessments are in place for all activities involving patients.
- Make sure that any incidents, concerns or shared information is 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.

13 Our Employees and Contractors Who Interact with Patients, Children, Young People or Adults at Risk while Carrying out Their Duties

- Make sure that our code of behaviour 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.
- Make sure that safeguarding risk assessments are in place for all activities involving patients.
- Make sure that any incidents, concerns or shared information is 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.

14 All Other Employees and Contractors

- Make sure that our code of behaviour 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.
- Make sure that any incidents, concerns or shared information is 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.

15 All Volunteers

- Make sure that our code of behaviour 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.
- Make sure that any incidents, concerns or shared information is reported according to our reporting procedures.
- Training requirement – Volunteer Core Training (which covers the relevant elements of safeguarding within the e-learning for health framework and includes Imperial Health Charity Code of Behaviour).

16 Those We Give Grants To

- Make sure that our code of behaviour 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.
- Make sure that any incidents, concerns or shared information is 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

Adult at Risk

A person who is, or may be, in need of care because of a mental or other disability, age or illness and who is, or may be, unable to take care of themselves or unable to protect themselves against significant harm or exploitation. Adults at risk are sometimes referred to as vulnerable adults.

Beneficiary, Beneficiaries

People, such as hospital patients, visitors and NHS staff, who directly receive goods or services from our programme.

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.

Emotional Abuse

(see Psychological harm)

Harm

Psychologically, physically or otherwise infringe (break, limit or undermine) someone's rights.

Neglect

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

Perpetrator

Anyone who is accused of causing harm or abuse to an child or adult at risk.

Physical Abuse

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

Psychological Harm

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

Safeguarding

Safeguarding means protecting a person's health, wellbeing and human rights, so that they can live free from harm, abuse and neglect. It is an essential part of providing high-quality health care. Safeguarding children, young people and adults is everyone's responsibility.

(See <https://www.england.nhs.uk/safeguarding/about/> for more information.)

Safeguarding applies consistently to all of our programmes, partners and staff. It requires us to actively identify, prevent and guard against all risks of harm, exploitation and abuse and to have established, accountable and transparent systems for response, reporting and response when risks arise. These systems must focus on survivors and protect those accused until proven guilty.

Safeguarding puts our beneficiaries and those affected by our work at the centre of all we do.

Sexual Abuse

When someone 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, imbalance of power in relationships or trust for sexual purposes, including (but not limited to) profiting financially, socially or politically. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used instead of 'victim' as it implies strength, resilience and the capacity to survive. However, it is up to the individual how they want to identify themselves.



HELPING
OUR HOSPITALS
DO MORE

