

SAFEGUARDING POLICY AND PROCEDURES

Name of Organisation	Education Charity ¹	Alms Charity ²
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The full Safeguarding Policy includes the following Appendices to provide further guidance on safeguarding issues.

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¹ St Giles in the Fields and William Shelton Education Charity (Charity Number: 1111907)

² St Giles in the Fields and Bloomsbury United Charity (Charity Number: 1111908)

This document summarises the safeguarding policy and procedures of the St Giles & St George Education Charity and the Alms Charity, together the “Charities”.

1. Policy Statement

The Charities have a duty to protect from harm ALL people who come into contact with the charity – trustees, staff, volunteers, grant beneficiaries and the clients of the organisations that we support. We will:

- Treat everyone with respect and celebrate their achievements;
- Carefully recruit and select all staff whether paid or unpaid;
- Respond to concerns and allegations appropriately;
- Embed safeguarding into our grants practices.

2. Scope of the Policy

Both Charities are grant-makers but do not generally work directly with children and young people or adults at risk. All organisations applying for funds from the Charities have primary responsibility for safeguarding their own beneficiaries, staff and volunteers.

The Alms Charity manages St Giles Almshouses, where the staff and trustees visit residents in their homes. They may help them with addressing maintenance issues or completing paperwork but staff members do not provide regulated activity such as physical help or personal care.

3. Recognising Safeguarding Incidents

If there are concerns about the welfare of any child, young person or adult at risk, all responsible persons in our organisations are expected to share those concerns, without delay, with the relevant Lead Safeguarding Officer for that Charity (or Deputy, if the Lead is unavailable).

Confidentiality

In cases of disclosure of abuse by children, young people, parents or carers, we are obliged to share information with the lead person for safeguarding (or deputy) who may have to refer our concerns to social services and/or the police.

Staff Allegations

Concerns about the behaviour of adult/s within the organisation will be referred, without delay, to the Lead Safeguarding Officer who will contact the LADO (Local Authority Designated Officer) at social services, or the police in an emergency.

As a result of investigations, we have a legal duty to refer to the DBS (Disclosure and Barring service) any individuals, who work or volunteer, in a regulated activity if it is thought they have harmed or posed a risk of harm to children. Referrals will also be made to any regulatory bodies.

Whistleblowing

In the unlikely event that the concerns are about the Lead Safeguarding Officer, it is important to refer to the Deputy Safeguarding Officer instead. This may not be appropriate,

in which case any member of staff may personally refer direct to the Local Authority Designated Officer (LADO).

4. Safeguarding Officers

Each charity has named a Trustee as their Lead Safeguarding Officer – their name and contact information is provided at the top of this policy. In addition, both Charities appointed the Clerk to the Trustees as the Deputy Lead Safeguarding Officer.

The Lead/Deputy Safeguarding Officer for each Charity is responsible for:

- monitoring and recording concerns;
- making referrals to social services without delay;
- liaising with other agencies;
- arranging training for all staff.

We will abide by the child and adult protection guidelines developed by the [Camden Safeguarding](#) Vulnerable Adults Board and [Westminster Safeguarding](#) Children Board.

5. Safeguarding Training

All staff members and the Alms trustees (but not Education trustees) will undertake appropriate safeguarding training relevant to their role, when they start with the charity.

As a minimum, all staff and Alms trustees should complete the Almshouse Association Safeguarding Vulnerable Adults online training course. A copy of the completion certificate should be provided to the Administrator. If any staff or trustees have undertaken relevant training through their work (ie: Dioceses of London or AgeUK Camden) then this is acceptable instead, but they MUST provide evidence.

The Lead Safeguarding Officer and Deputy Safeguarding Officer should undertake more advanced level training.

All staff and the Alms Trustees should undertake refresher training every two years.

The Charities will maintain records of all training completed by staff, Alms trustees and Safeguarding Leads.

6. Safeguarding Record Keeping and Reporting

The Charities will keep appropriate and secure records of any safeguarding concerns or incidents in accordance with the procedure in Appendix Three.

Safeguarding will be a standing item on the agenda at all board meetings and the number of safeguarding concerns raised during the previous quarter should be reported at each board meeting.

If any safeguarding concerns are considered as a ‘serious incident’, which means something that has caused or could cause significant harm to beneficiaries, staff or the charity’s reputation, then a report must be made promptly, fully and frankly to the Charity

Commission, regardless of whether other agencies like the police or social services have also been informed.

Appendix One – Embedding safeguarding into grants practice

All organisations applying for or receiving grant funding from either of the charities have the primary responsibility for safeguarding beneficiaries, staff and volunteers, and must take all the necessary steps to ensure that their organisation is operating in a safe and secure environment. We expect these minimum standards will include a:

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

As funders we will ensure that:

- Our Safeguarding Policy will be widely promoted and safeguarding expectations will be referred to in our grants guidelines;
- We undertake due diligence checks to confirm the minimum standards set out above;
- If there are issues of concern, we may explore these as part of the grants assessment but we are not able to provide advice and support around the development of safeguarding policies and procedures, and the provision of a grant does not in any way endorse or approve the beneficiaries policies;
- Each charity's grant terms and conditions outline expectations in regard to safeguarding for those who we fund;
- We ask for information on the implementation of safeguarding arrangements and any issues as part of its monitoring process, whether via annual reports or visits;
- Permission has been given before using images of any grant beneficiaries in promotional materials by either of the charities.

Appendix Two – Safer Recruitment and Induction Practice

Where relevant, we will ensure that staff, volunteers and trustees are suitable to work in an environment where they may encounter children and vulnerable adults as part of their role for the charities. As at the date of adoption of this policy, this applies only to the Alms Charity and not the Education Charity as the staff/trustees of the Education Charity do not directly encounter children and vulnerable adults as part of their work for the charity.

The Charities are committed to safe recruitment in line with relevant legislation and guidance from the government and Regulatory Authorities for recruiting all staff, paid or unpaid. We do this by:

- advertising vacancies with a clear commitment required to safeguarding;
- assigning all posts detailed job descriptions;
- where relevant, obtaining full personal details including fitness to work with children, young people and adults at risk by application form (not CVs) with particular relevance to previous work with children, young people and adults at risk;
- always taking up two written references, one from the most recent employer;
- undertaking all interviews face to face, based on the job description;
- having sound procedures and recording for interviewing to ensure we are satisfied, and can evidence that the applicant is appropriate and suitable.

Any appointment will only be confirmed subject to:

- ✓ a satisfactory criminal records check at the appropriate level*;
- ✓ a follow up of written references by telephone, if relevant to vacant post;
- ✓ a check of essential qualifications;
- ✓ confirmation of the right to work in the UK, if relevant;
- ✓ fitness to work, as relevant.

We have reviewed DBS guidance and examined the role descriptions of staff and trustees and concluded that our staff do not work directly with children and young people or provide regulated activity for adults at risk. Therefore, they are not eligible for Standard or Enhanced level DBS checks. **Our policy is to undertake a basic DBS check for all staff and volunteers (and Trustees of the Alms charity).*

The Charities have an induction and training policy with clear job descriptions and responsibilities, and all relevant procedures. All new staff, paid and unpaid, will receive induction training as soon as possible and sign to record they have:

- received and understood this policy;
- been given any relevant resources;
- understood the commitment to safeguarding training.

When needed, staff will receive further safeguarding training, at the appropriate level, as soon as possible. We also agree a probationary period of 6 months with clear goals, and then provide supervision/mentoring/appraisals at regular intervals of 3 months, and an annual appraisal with their manager. Updated training is normally required every 2 years (online) or three years (face to face). We will keep appropriate records of training undertaken.

Appendix Three – Safeguarding Procedures

i) Recognising Abuse

Everyone should be alert to ANY inappropriate behaviour that could be threatening to any person connected to either charity and particularly, to the signs of abuse. It is important to be observant, listen to what is being said and record it, eg, is what you are observing and being told about an injury consistent with the injury?

ii) Handling Disclosures

When a disclosure is made by a child, young person or adult at risk, it is important to remember to:

- take what you are being told seriously;
- stay calm and reassure;
- do not investigate;
- do not delay;

and always:

- seek advice from the Lead or Deputy Safeguarding Officer;
- make a careful recording of anything you are told or observe, date and sign.

A disclosure may come from someone telling you:

- they have or are being abused;
- they have concerns about someone else;
- they are themselves abusing or likely to abuse someone else.

iii) Responding to concerns – see diagram at the end.

iv) Record keeping

At all times when required, and especially where there is a safeguarding concern, we are committed to keeping records which are:

- recorded on a safeguarding incident form;
- of sufficient details of child, young person or adult at risk to identify individual who is subject of concern and any significant others;
- accurate and factual/based on fact, as a true record of:
 - what has been monitored/observed;
 - what has been said and by whom;
 - what has given cause for concern;
 - what action has and/or will be taken including the reason for those actions;
 - the reason stated for no action being taken and by whom;
- non-judgmental;
- timely within 24 hours;
- signed and dated by the writer and co-signed by the Lead or Deputy;
- shared, as appropriate, by the Lead or Deputy;
- stored safely and securely by the Lead or Deputy.

Appendix Four – Other Safeguarding Issues

Bullying and Harassment

Bullying and harassment can take many forms and include:

- physical violence including threats, verbal assaults and taunts, the destruction of property, extortion, unwanted sexual interest or contact;
- indirect forms of bullying, including ignoring a person and the withdrawal of friendship, malicious gossip and spreading rumours, abusive or oppressive graffiti, the use of social media, electronic messages and websites;
- it is often motivated by prejudice against certain groups, for example on the grounds of race, religion, gender and disability.

Whether directed at children, young people, adults at risk, staff, volunteers, parent and carers, bullying and harassment, physical and/or emotional abuse will not be tolerated. All such behaviour will be treated as a safeguarding concern when aimed at children, young people and or adults at risk.

The Charities will:

- provide a culture of equality and respect for all with zero tolerance to any form of bullying or harassment;
- report all incidents of bullying or harassment observed or disclosed to the Lead or Deputy;
- take immediate steps to stop the behaviour and mitigate the effects of bullying and harassment;
- record all incidents with observations and witness statements, and action taken, signed, timed and dated.

Photography & Filming Guidance

The use of photography is really important to record the successes and achievements of children, young people and adults at risk in their lives and activities. However, it is vital to remember that photography can be used and distributed inappropriately, including on the Internet.

It is therefore important to be clear about:

- explaining to parents and carers why caution is necessary;
- the purpose of photos, eg, parent's and carer's own record, media and publicity, etc;
- the consent required when using a professional photographer;
- informing parents and seeking their consent for any publication or media use;
- publishing only limited details alongside individuals photos in newspapers, etc;
- any group photos being taken only during the activity or on the premises.

As funders, we love photos of grant beneficiary activities but we will remind them that they should only share photos where they have permission.

Appendix Five – Definitions

The following definitions apply throughout the Safeguarding Policy and associated procedures.

Who is classed as a child?

Any person who is under the age of 18 years is classed as a child. Even if a young person aged 16/17 is living independently, for the purposes of safeguarding, they are still classed as a child. The only exception is if they are in employment.

Regulated activity relating to children covers:

- (i) Unsupervised activities: teach, train, instruct, care or supervise children or provide advice/guidance on well-being; or drive a vehicle only for children;
- (ii) Work for a limited range of establishments (specified places) with opportunity for contact: for example, schools; children's homes, childcare premises. Not work done by supervised volunteers.

Work under (i) or (ii) is regulated activity only if done regularly*

- (iii) Relevant personal care, for example washing or dressing; or health care by or supervised by a professional;
- (iv) Registered child-minding; and foster-carers.

Who is classed as a vulnerable adult?

An adult is a person aged 18 or over. The same adult may be considered as 'vulnerable' in some circumstances but not in others. In general, an adult is considered to be 'vulnerable' when in regulated activity as described below.

An adult at risk of abuse or neglect is defined by The Care Act 2014 as someone who is experiencing or at risk of abuse, and has needs for care and support which mean they are unable to protect themselves against the abuse or the risk of it. This definition includes young people who have a learning difficulty and possibly those who have a physical difficulty or more serious mental health problems.

The charities have a wider definition of whom we consider to be adults at risk. This includes people encountering domestic abuse, sexual exploitation and/or human trafficking, people who are experiencing homelessness, people experiencing addiction problems and people who are refugees or asylum seekers.

The definition of regulated activity relating to adults places the emphasis on the kinds of activity carried out for any adult who requires them rather than on any specific groups of people or vulnerabilities.

Regulated activity with adults includes:

- Providing health care by, or under the direction or supervision of, a regulated health care professional;

- Providing personal care made up of:
 - physical assistance with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't carry this out themselves because of age, illness or disability;
 - prompting and then supervising with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't decide to do this for themselves because of age, illness or disability;
 - training, instructing, providing advice or providing guidance on how to physically assist an adult with eating, drinking, toileting, washing, bathing, dressing, oral care or the care of skin, hair or nails for adults who can't carry this out themselves because of age, illness or disability;
- Providing social work by a social care worker to an adult who is a client or potential client;
- Assisting an adult who can't manage themselves because of their age, illness or disability with the day-to-day running of their household relating to:
 - managing the adult's cash;
 - paying the adult's bills;
 - shopping;
- Assistance in the conduct of an adult's own affairs, where:
 - a Lasting Power of Attorney is created;
 - an Enduring Power of Attorney is registered or applied for, or the Court of Protection has made an order in relation to the making of decisions on the adult's behalf;
 - an independent mental health or mental capacity advocate is appointed;
 - independent advocacy services are provided;
 - a representative is appointed to receive benefits payments on the adult's behalf;
- Conveying adults to, from or between health care, personal care and/or social work services who can't convey themselves because of their age, illness or disability;
- Day-to-day management or supervision of anyone carrying out the above activities.

** 'Regularly' means carried out by the same person once a week or more often. However, some activities are classed as regulated if only done once, eg, if personal care is provided.*

What is abuse?

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.

These are broad categories and some of them apply more to children or vulnerable adults, rather than both. The broader risks to be aware of are:

- *Physical abuse* - including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

- *Sexual harassment, abuse and exploitation* - including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, could not consent or was pressured into consenting. This involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening and includes penetrative and non-penetrative acts. It may also include non-contact activities such as looking at, or being involved in, the production of pornographic materials, watching sexual activities or encouraging them to behave in sexually inappropriate ways. (Men and women can be perpetrators of sexual abuse as can other children).
- *Negligent treatment* - including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating. It may also include neglect of basic emotional needs.
- *Emotional Abuse* - continual emotional ill treatment causing severe and persistent effects on the child's emotional development and may involve:
 - conveying the message that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
 - imposing developmentally inappropriate expectations;
 - not providing opportunities for the child to express their views, deliberately silencing them, making fun of how they communicate and what they say;
 - causing the child to feel frightened or in danger – eg, witnessing domestic abuse;
 - bullying, including cyber bullying;
 - exploitation and/or corruption of children.

Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone.

- *Financial abuse* - including theft, fraud, exploitation, pressure in connection with Wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- *Faith abuse* – this covers belief in witchcraft and spirit possession and also attempts to lead people towards extremism and radicalisation.
- *Forced marriage* - One or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure and/or abuse is used. One or both of the people can be children (legally under 18) and below the age of consent (16). The abuse can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family – sometimes this is financial).
- *Female genital mutilation* - FGM is seen as child abuse in the UK and a violation of the human rights of girls and women. In all circumstances where FGM is practised on a child it is a violation of the child's right to life, their right to their bodily integrity and their right to health. FGM includes all procedures involving the partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons. FGM is also sometimes known as 'female genital cutting' or 'female circumcision'. Communities often use local names for referring to this practice eg, 'Sunna'.

- *Psychological abuse* - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- *Discrimination on any of the grounds of the Equality Act 2010* - including race, sex, culture, religion, politics, that is based on a person's disability, age or sexuality and other forms of harassment, slurs or similar treatment and hate crime.
- *Domestic abuse - Home Office Definition 2004* - '*Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are, or have been intimate partners or family members, regardless of gender or sexuality.*'
- *Self-neglect (adults)* – covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Appendix Six – Incident Reporting Form

SAFEGUARDING INCIDENT REPORTING FORM

SGSG is committed to ensuring that every person associated with its work is safeguarded from harm. This form should be used to report any incident/concern related to SGSG staff, trustees, grantees and Alms residents.

Whereas we will take every effort to maintain confidentiality, we will take action depending on the severity of the report or incident. We will always aim to seek consent before acting unless the contents of this form put you, or others, at immediate risk of harm or danger. In this case we are obliged to pass the concerns on, in a sensitive manner, to relevant authorities. We will always inform you of actions taken.

You may wish to submit your concerns anonymously. However please be aware that anonymised reports can limit further investigation. If you wish to disclose your name on a confidential basis, we will make every effort to maintain this confidence. Please return this form to our safeguarding leads:

Education Charity: frhicks@me.com

Alms Charity: abul.choudhury@ageukcamden.org.uk

1. Reporter's Details

Date & time	
Name of person making the report. ³	
Your location	
Your contact details, including email address & phone number(s)	

2. Type of Incident

Individual(s) involved				
Date & time of the incident				
Location of incident				
Identity of the nature of the incident	Child Safeguarding	Adult Safeguarding	Sexual Exploitation	Safety / Security

³ If you would prefer to stay anonymous, you can leave this box empty.

3. Details of Allegations/Concerns

Summary of the incident - Please state in few words what the incident/concern comprises of	
Details of the incident – Who is supposed to have done what, to whom, when where, who else was present? Please include facts, not opinions)	
Were/are there any (other) witnesses? ^{4*} If yes, and where the witness is happy to be contacted by WRAP, please give their contact details	
Are there any other factors you would like us to consider?	

4. Immediate Action

Brief summary of any steps already taken	
Has anyone else been informed of the matter? Please provide details of the name of the agency & of the contact person, and relevant email addresses & phone nos	

5. Preferred Next Steps

What would you like to happen next in relation to this report?	
How would you like the Designated Safeguarding Lead to contact you about this report? Please give your email & telephone number	

Thank you for completing this report.

⁴ We ask this question because witness testimony can help further investigation, however it is not required.