
Policy: **Safeguarding Policy**

1. Introduction

At SFCT, our core belief is that everyone, without exception and regardless of any personal circumstances or characteristic, has the right to be protected from all forms of harm, abuse, neglect, exploitation and harassment. This policy details how we make sure all those who work for us are clear about the importance of Safeguarding and what to do if they have any concerns relating to this.

If you have any queries about the detail within this policy, please contact a member of the Safeguarding Advisory Group or a member of the HR (Human Resources) Team.

2. Scope

This policy applies to all SFCT staff, trustees, volunteers and interns (**our people**) and to individuals or organisations we engage to carry out activities on our behalf (**associated personnel**) except Gatsby Africa, who have their own policy.

3. Relevant dates

Policy originated: August 2020

Last Review Date: October 2022

Date of next Review: October 2023

4. Related policies

- Anti-bribery and corruption
- Diversity Equity and Inclusion
- Fairness and Respect at Work
- IT Equipment usage
- Recruitment
- Social Media
- Whistleblowing

5. Objectives

The objectives of this policy are to:

- Protect children and adults from any harm that may be caused to them because of engaging with SFCT.

- Make sure that our grant holders have policies and procedures to safeguard everyone.
- Describe how we recognise, respond to and report safeguarding concerns.
- Operate places of work that are safe and equitable.
- Plan and deliver programmes that encourage safety and do no harm.

6. Key principles

- We will operate in ways that as far as possible ensure everyone is protected from harm that may arise from our work.
- We will not tolerate abuse or exploitation by any of our people or associated personnel.
- We will ensure that our workplaces are free from discrimination, bullying and harassment, and our people are treated with fairness and respect.
- We will take reasonable, proportionate steps to check that our grant holders have adequate safeguarding policies and procedures in place, and that they engage with people safely and equitably.
- We will recognise, respond to and report any safeguarding concerns raised with us promptly and confidentially.
- For programmes that we run ourselves or manage in partnership with others, we will plan and deliver these in ways that include safeguarding as a primary, central consideration and aim to do no harm.

7. Governance

Safeguarding is the responsibility of every trustee of each trust. It is for each trust to agree how this responsibility is discharged. Adoption of this policy and any operational procedures to implement it are a minimum requirement. Individual trusts, especially those involved in planning and delivery of programmes, must agree and adopt additional requirements needed for their own work.

8. Safer workplaces

Our policies to ensure our workplaces are healthy, safe, diverse, equitable, inclusive and free from bullying and harassment inform the overall approach to safeguarding. These are reviewed and approved by the CEO for SFCT.

9. What is safeguarding?

Safeguarding means protecting the health, wellbeing and human rights of children and adults and enabling them to live free from exploitation, harm, abuse and neglect.

The Charity Commission defines safeguarding as the range of measures to protect people in a charity, or who come into contact with it, from abuse and maltreatment of any kind. This includes the people a charity benefits, staff, volunteers and anyone coming into contact with the charity.

Safeguarding includes having safe, healthy, inclusive workplaces where people are treated fairly and with respect, and where people can work without coercion and free from bullying and harassment

For work that delivered directly or in partnership with others, safeguarding includes designing programmes that are free from exploitation and do no harm.

10. Prohibited behaviour

Child: anyone aged under 18 years.

Adult at risk of harm: anyone aged 18 years or over and at risk of exploitation, abuse or neglect because of their need for care or support, or because of their social position in relation to people with resources, power or authority.

The following behaviours are prohibited:

Children

- Engaging in sexual activity with a child.
- Sexually abusing or exploiting a child.
- Subjecting a child to physical, emotional, psychological or financial abuse or neglect.

Adults

- Sexually abusing or exploiting an adult.
- Subjecting an adult to physical, emotional, financial or psychological abuse or neglect.

Sexual and financial exploitation and abuse of power – children and adults

- Exchanging money, employment, goods or services, including food and shelter, for sexual activities or intimate companionship with a child or adult.
- Involving a child or adult in any commercially exploitative or criminal activities, including child labour, forced labour, sexual exploitation or trafficking.
- Using a position of power to take advantage of a child or adult.

Harmful communication and representation – children and adults

- Any of the above carried out using a physical or electronic document, email, text message, chat service, social media platform, phone or video communication, or by owning, creating, distributing or receiving a visual or audio representation.

Grooming

- Activities that are, or could be seen as, preparation for any of the above.

13. Responsibilities and obligations

SFCT will:

- Keep this policy under review and up to date (reviewed at least annually).
- Ensure that our people and associated personnel are aware of and understand this policy.
- Ensure that our people receive safeguarding training appropriate to their role, in particular, but not limited to, people who:
 - have contact on a regular basis with children or adults at risk of harm in the course of their work
 - assess and monitor grants
 - develop and deliver projects, or do this in partnership with other organisations
- Have an up-to-date Disclosure and Barring Service check (or equivalent) in place for any of our people who on a regular basis have contact that is more than incidental or fleeting with children or adults at risk of harm.
- Take any reports of safeguarding concerns seriously, respond to them, promptly, investigate them appropriately and deal with them effectively.
- Keep confidential, detailed and accurate records of all safeguarding concerns, and store these securely.

Our people and associated personnel must:

- Familiarise themselves and comply with this policy and any guidelines provided for work on a specific trust.
- Not engage in any of the prohibited behaviours described in this policy. Any staff member found to have engaged in any of those behaviours will be subject to a disciplinary sanction, up to and including summary dismissal.

- Report all safeguarding concerns promptly, whether these relate to our people, our associated personnel or a grant holder.

14. Grant making

For the grant making trusts, our primary safeguarding focus is to assess the safeguarding arrangements of current and prospective grant holders.

Given the number and diversity of the trusts, there is considerable variation in the grant holders of each trust and the safeguarding risk each of them must consider. The appropriate safeguarding assessment for each trust will therefore vary and depend on several factors. Some of our grant holders may never come into contact or deal with children or adults at risk of harm. Others may have significant involvement. In some cases, the location of grant holders will be relevant.

Some grant holders operate outside the UK, often in some of the poorest and least-developed areas of the globe, where children and adults may face different or additional risks of exploitation, and employees may be subject to a power imbalance.

For all grant holders, we aim to conduct a reasonable and proportionate assessment of their approach to safeguarding. We will take a number of factors into account, including:

- Scope of the funding.
- Nature of the grant holder's activities.
- The risks of abuse, neglect or exploitation of people that the grant holder may encounter in its work.
- Location of the work, with particular regard to any additional safeguarding risks that might be connected to that location.

The trustees of each trust, together with the CEO of SFCT, who is also the Safeguarding Officer, and the trust executives will ensure that clear guidelines are in place for each trust on:

- Assessing applications
- Recommending prospective grant holders
- Monitoring grants.
- Acknowledging, responding to and reporting safeguarding concerns

These guidelines will be designed to reflect a trust's grant holders generally. They will ensure that reasonable and proportionate assessments and monitoring are conducted, both at the application stage and over the life of any funding. The guidelines will be regularly reviewed and

updated as necessary to ensure that they remain fit for purpose. Guidelines will follow a reflect – research – review – recognise – respond – report framework:

- **Reflect:** consider the safeguarding risks and obligations of the grant holders the trust generally supports to inform a checklist, flowchart or series of questions to consider in assessing an application; set out the trust’s safeguarding requirements clearly and concisely and make these available to current and prospective grant holders.
- **Research:** assess whether a grant holder/application meets the expected safeguarding requirements.
- **Review:** at regular intervals, discuss with trustees safeguarding concerns reported by grant holders, or more widely if there is relevant learning; consider changes in the operating environment, legislation, guidance and safeguarding practice and revise the guidelines to reflect these.
- **Recognise:** be alive to safeguarding questions on project visits and in grant reports.
- **Respond:** acknowledge safeguarding concerns raised by grant holders promptly and deal with them in an appropriate, timely and confidential manner.
- **Report:** report safeguarding concerns promptly to the Safeguarding Officer or another senior member of SFCT staff, and if necessary to trustees.

Safeguarding frameworks for individual trusts will be reasonable, proportionate and deliverable.

15. Programming

We must ensure that work is designed and delivered to do no harm. This means agreeing and implementing measures to protect everyone who comes into contact with our work from intentional or unintentional harm.

Safer programming requires operating with integrity and accountability. Our primary accountability for safeguarding should be to the participants of our programmes.

The trustees or directors, together with the CEO of SFCT, will ensure there are clear operational procedures in place for programmed work that enact the following principles:

- **Do no harm:** the best interest of programme participants is always at the heart of every decision or action.
- **Participation:** participants and their wider communities are asked what makes them feel safe and unsafe.

- **Training:** people who manage or deliver programmes are trained and feel confident to design and implement safe programs.
- **Adaptation:** learning should be taken seriously, with reflection and review planned throughout a project's cycle and adjustments made where necessary.

Guidelines will follow a reflect – design – deliver and deliver – review – recognise – respond – report framework:

- **Reflect:** consider the safeguarding risks and obligations arising from a programme to inform a checklist, flowchart or series of questions to design and deliver the work; consult with all participants to identify possible harms and how to respond to these; set out the project's safeguarding framework clearly and concisely and make this available to everyone involved in the work.
- **Design and deliver:** integrate safeguarding concerns into the programme's design and delivery; ensure your work is planned to do no harm; ensure that all participants are consulted on what they consider safe and unsafe; ensure there is adequate safeguarding training; appoint a safeguarding lead for the project; communicate your approach to safeguarding; ensure there is regular reporting on and review of safeguarding for the project.
- **Review:** at regular intervals, discuss with trustees or directors safeguarding concerns that arise from your project, or more widely if there is relevant learning; include participants and their wider communities in your review; consider changes in the operating environment, legislation, guidance and safeguarding practice and revise the guidelines to reflect these.
- **Recognise:** be alive to safeguarding questions in project delivery, management and reporting.
- **Respond:** acknowledge safeguarding concerns raised by staff, volunteers, participants and their wider communities promptly and deal with them in an appropriate, timely and confidential manner. Have a clear process on how to support people who raise safeguarding concerns.
- **Report:** report safeguarding concerns promptly to the Safeguarding Officer or another senior member of SFCT staff, and if necessary to trustees or directors. This is in addition to any programmatic reporting arrangements you have implemented.

16. Safeguarding training

The CEO will also ensure provision of regular and up to date safeguarding training, and access to learning networks and specialist advice as necessary.

17. Reporting safeguarding concerns

Any of our people or associated personnel who have a safeguarding concern of any sort, whether in relation to a colleague, trustee, volunteer, intern any associated personnel or at a grant holder, must report it immediately to the Safeguarding Officer. If they do not feel comfortable reporting it to the Safeguarding Officer, they may report it to any other appropriate senior member of SFCT, such as their line manager or a senior manager. The Workforce Safeguarding Officer is also available for reporting of workforce and programmatic concerns.

If in doubt about whether a concern is a safeguarding issue, it should be reported, even if the concern is based on rumour or an informal discussion.

No one will be penalised for having reported a safeguarding concern in good faith.

If a concern is reported, other than to the Safeguarding Officer, the SFCT member of staff should immediately notify the Safeguarding Officer. The Safeguarding Officer must consider, as soon as notified of any safeguarding concern, whether immediate steps need to be taken to protect any individual(s) who have been reported to be at risk. If in doubt as to the appropriate steps, the Safeguarding Officer should consult with the CEO of the Gatsby Charitable Foundation (the **GCF CEO**).

The Safeguarding Officer must document all reports of safeguarding concerns or issues, with as much detailed information as possible. The Safeguarding Officer must maintain a register of safeguarding concerns which will be kept securely and confidentially.

Confidentiality is key at all stages of the reporting or investigation process. Confidentiality must be balanced against the need to investigate promptly and fairly and, in some cases an obligation to report to the authorities, such as the police or social services.

The level of investigation and the investigation process itself will depend on the nature of the safeguarding issue identified and where it arises. The Safeguarding Officer, in consultation with the GCF CEO, will decide on the appropriate process. For example, if it involves one of our people, it would be a potential disciplinary issue and we would expect it to be investigated and dealt with, as appropriate, under our Disciplinary Procedure. If in connection with a grant holder, where SFCT will, inevitably, have a more limited ability to investigate, we would expect, in most circumstances, to engage with that organisation under their policies and procedures in the first instance. We acknowledge that there may be circumstances in which, irrespective of where the safeguarding issue has been identified, it is considered appropriate to report immediately to external authorities.

The Safeguarding Officer and the GCF CEO will decide whether any safeguarding issue is a serious incident, which the trustees of the applicable trust should report to the Charity Commission.

If the individual reporting a safeguarding concern is not satisfied that it is being dealt with appropriately, they have the right to escalate the matter either internally, to the trustees of the particular trust, the GCF CEO or the Management Committee or to report it externally to a statutory body, such as the police or social services.

18. Safeguarding Officers

The SFCT Safeguarding Officer is Karen Everett, the CEO of SFCT

The Deputy Safeguarding Officer is Matthew Williams, Trust Executive

The Workforce Safeguarding Officer is Peter Hesketh, CEO, Gatsby Charitable Foundation