The Sainsbury Family Charitable Trusts: Safeguarding policy

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Accessibility statement

We are committed to making our documents accessible to all employees. If you require this policy in an alternative format, such as large print, audio, Braille, or another accessible format, please email: people@sfct.org.uk (hyperlink) or phone 020 7410 0330.

1. Introduction

This policy outlines our safeguarding procedure and what we expect from all those who work for us.

Our core belief at The Sainsbury Family Charitable Trusts (SFCT) is that everyone has the right to be protected from all forms of harm, abuse, neglect, exploitation, and harassment, without exception or regard for any personal circumstances or characteristics. 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.

We recognise that safeguarding responsibilities apply equally to digital, online and remote activities. This policy therefore covers safeguarding risks arising from the use of digital platforms, tools, devices and online services, whether delivered wholly online or in blended formats.

This policy applies to safeguarding concerns arising from:

- Face to face activities
- Online or digital service delivery
- Communication via digital platforms (e.g. video conferencing, messaging apps, online groups, email, social media)

This policy applies to all SFCT employees, 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, which has its own policy.

Gatsby Education is included in this policy but is also covered by a further annex which can be found in section 2 below.

If you would have a question about this policy, or would like more information on safeguarding, please contact people@sfct.org.uk (hyperlink).

2. Related policies, guidelines and procedures

- Anti-bribery and Corruption Policy (hyperlink)
- Diversity, Equity and Inclusion Policy (hyperlink)
- Fairness and Respect at Work Policy (hyperlink)
- Gatsby Education annex to Safeguarding Policy (hyperlink)
- IT Equipment Usage Policy (hyperlink)
- Recruitment Policy and Procedures (hyperlink)
- Sexual Harassment Policy (hyperlink)
- Social Media Policy (hyperlink)
- Whistleblowing Policy (hyperlink)
- Mandatory Training Policy (hyperlink)

3. Definition

3.1 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, including sexual harassment.

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

3.2 Definitions of adult and child

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.

4. Key objectives and principles

4.1 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 appropriate safeguarding policies and procedures in place.
- 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.

4.2 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.

5. Responsibility

5.1 Governance

Every Trustee/Director of SFCT Trusts and other bodies, is responsible for safeguarding. It is up to each Trust or other body to decide how to carry out this responsibility. Adoption of this policy and any operational procedures to implement it are a minimum requirement. Individual Trusts, particularly those involved in programme planning and delivery, must agree and adopt additional requirements for their own work.

5.2 Safer workplaces

The overall approach to safeguarding is informed by our policies, which are approved and reviewed by the CEO of SFCT to ensure that our workplaces are healthy, safe, diverse, equitable, inclusive, and free of bullying and harassment, including sexual harassment.

6. Unacceptable behaviour

6.1 Prohibited behaviour

Please refer to Sections 4.2 for definitions.

The following behaviours are prohibited:

Children

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

Adults

- Sexually harassing, abusing or exploiting an adult.

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

6.2 Sexual and financial exploitation and abuse of power is prohibited

- 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.

6.3 Harmful communication and representation is prohibited

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.

6.4 Grooming is prohibited

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

6.5 Bullying and harassment in the workplace are prohibited

Bullying and harassment, including sexual harassment will not be tolerated under any circumstance. This includes events that occur outside of the office and harassment by third parties. This is applicable to all employees including permanent, fixed term and temporary employees, Trustees, consultants, contractors, trainees, seconded employees, volunteers, interns, students and those in work placements.

7. Responsibilities and obligations

7.1 What will we do?

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, who assess and monitor grants, or who 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.

7.2 People and associated personnel

Our people and associated personnel must familiarise themselves and comply with this policy and any guidelines provided for work on a specific SFCT Trust or body.

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

8. Grant making

8.1 Safeguarding while 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 Trusts, there is significant variation in the grant holders of each Trust and the safeguarding

risk that each must consider. As a result, the appropriate safeguarding assessment for each Trust will differ and be determined by a number of 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. The location of grant holders will be relevant in some cases.

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.

8.2 Assessments for grant-holders

For all grant holders, we aim to conduct a reasonable and proportionate assessment of their approach to safeguarding. We will take several 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 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

9. Grant making guidelines

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.

10. Programming

10.1 Safer 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.

10.2 Principles for programmed work

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 about designing and implementing safe programmes.
- **Adaptation**: learning should be taken seriously, with reflection and review planned throughout a project's cycle and adjustments made where necessary.

11. Programming guidelines

11.1 Guideline procedure

Guidelines will follow a reflect – design 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.
- When **delivering services digitally**, design safety and safeguarding into services from the outset; ensure users understand how services work, including risks and boundaries; protect privacy, data and confidentiality; take into account unequal access, skills or digital confidence; ensure clear routes for reporting concerns and accessing support.
- **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.

12. Training

12.1 Safeguarding training

The SFCT Mandatory Training policy sets out the format and frequency of mandatory safeguarding training for all staff.

13. Reporting concerns

13.1 Reporting safeguarding concerns

Employees or associated personnel who have a safeguarding concern of any kind, whether it is about a colleague, trustee, volunteer, intern, or associated personnel, or a grant holder, must report it to the Safeguarding Officer immediately.

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.

13.2 What if a concern is raised with someone other than the safeguarding officer?

If a concern is reported to someone other than the Safeguarding Officer, the SFCT member of staff should notify the Safeguarding Officer right away. When notified of a safeguarding concern, the Safeguarding Officer must consider whether immediate action is required to protect any individual(s) who have been reported to be at risk. If the Safeguarding Officer is unsure what steps to take, they should consult with the CEO of Gatsby Charitable Foundation.

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.

13.3 Confidentiality

At all stages of the reporting or investigation process, confidentiality is essential. Confidentiality must be balanced against the need to conduct prompt and fair investigations, as well as, in some cases, an obligation to report to authorities such as the police or social services.

13.4 Approach to investigation

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 Workforce Safeguarding officer, CEO, Gatsby Charitable Foundation 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.

13.5 Procedure if investigation is connected to a grant-holder

If it is in connection with a grant holder, where SFCT will inevitably have a more limited ability to investigate, we would expect to engage with that organisation first under their policies and procedures.

There may be instances where, regardless of where the safeguarding issue has been identified, it is deemed necessary to immediately notify external authorities. The Safeguarding Officer, CEO, SFCT and the Workforce Safeguarding Officer, CEO, Gatsby Charity Foundation 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 Workforce Safeguarding officer, CEO, Gatsby Charitable Foundation or the Management Committee or to report it externally to a statutory body, for example the police or social services.

14. Safeguarding officers

SFCT Safeguarding Officer: Karen Everett, CEO, SFCT

Deputy Safeguarding Officer: Matthew Williams, Trust Executive

Workforce Safeguarding Officer: Peter Hesketh, CEO, Gatsby Charitable Foundation

15. Reporting a safeguarding concern

To report a safeguarding concern, please contact safeguarding@sfct.org.uk (hyperlink).

Signed

Karen Everett, CEO

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