

Safeguarding

Policy

1. Introduction

1.1 The Charity provides advice, guidance, and support to displaced Ukrainian citizens in obtaining visas, finding safe accommodation, and comfortably settling in the United Kingdom. The key method of support is assisting Ukrainian citizens with navigating the UK's Homes for Ukraine visa application process, and other attendant processes, including Animal and Plant Health Agency applications. The Charity provides its support:

1.1.1 **through digital means:** through its website and social media and through online conversations with refugees on Telegram, Facebook, Instagram, WhatsApp, and by email; and

1.2 The Charity is committed to proactively safeguarding and promoting the welfare of its beneficiaries, volunteers, staff, and trustees, and to taking reasonable steps to ensure those who encounter the Charity do not, as a result, come to any harm.

1.3 This policy relates to the Charity's commitments to safeguarding (as defined by the Charity Commission) and protecting children and adults at risk.¹

2. Safeguarding in the context of the Charity's activities

2.1 The Charity has been established to respond swiftly to the rapidly evolving needs of Ukrainian refugees in an unstable and fast-paced geo-political context. In this challenging context, the Charity is committed to work quickly, flexibly, and creatively to provide support to Ukrainian refugees to help them rebuild their lives in the UK.

2.2 The Charity expects that many of its beneficiaries will be **adults at risk** (as defined in paragraph 5 below) given their status as refugees. The Charity strives to protect the rights and uphold the dignity of all refugees with which it works.

3. What is safeguarding?

3.1 Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and adults at risk wherever possible and dealing sensitively and appropriately with the situation should any incident arise which places a child or adult at risk or in which a child or adult has suffered abuse.

¹ The Charity Commission has published guidance, "Safeguarding and protecting people for charities and trustees", which is updated from time to time and available at: <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>.

3.2 Vulnerable persons can be harmed, or put at risk of harm, by organisations and institutions, and abuse of vulnerable groups can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.

3.3 Unintentional acts may lead to harm due to a lack of 'due diligence' or competence or through organisational negligence, such as inadequate care and supervision, lack of policies, procedures, and guidance to inform programming and practice, or lack of staff compliance with legal requirements. Also, deliberate actions may be taken by people with intent to abuse vulnerable people.

4. **What is abuse?**

4.1 Abuse 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.

4.2 Abuse can take a variety of forms, for example:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Psychological abuse
- Neglect
- Radicalisation
- Financial abuse

4.3 A non-exhaustive list of potential indicators of abuse is set out in the **Safeguarding Cribsheet** in **Appendix 1** of this Policy.

5. **Key definitions**

5.1 **A child** is defined as anyone who is under 18 years of age.

5.2 **An adult at risk** is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support who is experiencing, or is at risk of, abuse or neglect and who, as a result of those care and support needs, is unable to protect themselves from either the risk of or the experience of abuse or neglect. Whether an adult is at risk or not is something which can change with their circumstances and is not fixed. An adult at risk may have a mental illness, a learning disability, a physical disability, be frail or be otherwise in need of additional assistance to protect themselves from harm or exploitation, for example, due to social factors such as poverty, displacement or lack of services or support.

6. **Scope of this policy**

6.1 ***For the Charity's staff and contractors***

6.1.1 Compliance with this policy is mandatory for all the Charity's Staff. For the purposes of this policy "**Staff**" is defined as anyone who works for, or is engaged by the Charity, either in a paid or

unpaid, full time or part time capacity. This includes directly employed staff, contractors, agency staff, consultants, visitors, researchers, volunteers, interns, and equivalents.

6.2 ***For Trustees***

6.2.1 As the Trustees must always act in the best interests of the Charity and its ultimate beneficiaries, they are also required to comply with this policy.

6.3 ***For Partners***

6.3.1 “**Partner**” means any organisation which receives funding from the Charity, which collaborates with the Charity to deliver any of its programmes or activities, or which is otherwise associated with the Charity’s name and brand. It includes organisations based in the UK which provide support to Ukrainian refugees (such as sponsor-matching services, provision of accommodation and welfare assistance on arrival) with which the Charity collaborates.

6.3.2 This policy is intended to work alongside the equivalent policies of the Charity’s Partners, where appropriate. The Charity expects that the principles and approaches already shared with Partners mean that they will fully support the values and commitments set out in this policy and compliance with this will be a condition of a written agreement between the Charity and the Partner.

6.3.3 The Charity will ensure that any Partners which provide support to Ukrainian refugees in the UK or elsewhere, have in place appropriate safeguarding policies and procedures (which share the values and commitments in this policy) before signposting any of its beneficiaries to such Partners’ services.

6.3.4 The Charity will ensure that each Partner has appointed a member of staff who will be responsible for promptly reporting to the Charity’s Safeguarding Lead (or, if he is unavailable, another appropriate person) any safeguarding concerns that arise in, or relevant to the context of the partnership.

Consequences of breaches of this policy

6.4 Breaches of this policy by Staff will be treated seriously and will be treated as a potential cause for disciplinary action (in the case of employees of the Charity) or termination of the relationship by other means. Breaches by Trustees may result in the termination of their trusteeship. Breaches by Partners may result in the termination of the relationship in accordance with the relevant partnership agreement.

7. **Roles and Responsibilities**

7.1 The **Trustees** of the Charity have ultimate responsibility for ensuring that the Charity protects from harm all those who come into contact with it. The Trustees have oversight of the Charity’s safeguarding and linked policies and oversee the Charity’s handling of safeguarding reports. The Trustees also have responsibility for deciding whether any serious incident reports need to be made to the Charity Commission in relation to safeguarding incidents.

7.2 The Trustees may appoint one of their number to act as **Safeguarding Trustee**. The role of the Safeguarding Trustee will be to act as the first point of contact on the board for the UK Safeguarding Lead, but the appointment of a Safeguarding Trustee will not detract from the fact that all the Trustees share collective responsibility for safeguarding within the Charity.

7.3 The Charity will have a **UK Safeguarding Lead** (the “**Safeguarding Lead**”).

7.4 The **Safeguarding Lead** will:

7.4.1 respond to all safeguarding concerns and enquiries, as set out in paragraph 11;

7.4.2 make any necessary reports to statutory agencies and will keep records of any action taken in response to safeguarding concerns;

7.4.3 ensure the Charity’s Safeguarding Policy reflects changes to legislation and is kept up to date in relation to best practice when the policy is reviewed;

7.5 ensure that Trustees, members of staff and volunteers have appropriate training in the application of the policy on an annual basis and will review the position annually; and

7.6 monitor the overall trend of any safeguarding concerns and report annually (or more frequently, as appropriate) to the Trustees. While all the Trustees have a collective responsibility for safeguarding, the Safeguarding Trustee will usually be the first point of contact on the board for the Safeguarding Officer.

7.7 **All Staff** working directly with beneficiaries (including children and adults at risk) within or connected with the Charity’s activities/events should be familiar with this policy.

7.8 In addition, Staff should conduct themselves in accordance with the Charity’s **Code of Conduct** (which is set out at **Appendix 2**). This provides guidance on acceptable and desirable conduct to protect beneficiaries (and particularly children and adults at risk) who may encounter the Charity.

7.9 **Every individual** who becomes aware of any suspicions or allegations regarding harm to children or adults at risk is required to report this immediately to the Safeguarding Lead.

8. **Statement of Commitments**

8.1 The Charity commits to taking all reasonable measures to ensure all individuals (including children and adults at risk) impacted by projects and programmes delivered and/or supported by the Charity are protected as far as possible from harm, including exploitation, neglect, and abuse of all kinds.

8.2 The Charity commits to:

(a) Developing a '**culture of safety**' within the Charity that creates and maintains protective environments.

(b) Placing safeguarding at the heart of recruitment practices by complying with the **safer recruitment** practices set out in paragraph 9 below.

(c) Increasing **understanding** and raising the **awareness** of Staff and Trustees of risks relating to safeguarding within the organisation and in connection with its activities and ensuring all Staff are aware of the need to comply with the **Code of Conduct** and receive the guidance in the **Safeguarding Cribsheet**.

(d) Taking appropriate and proportionate **action if this policy is not complied with**.

(e) Maintaining adequate **insurance** in relation to the Charity's activities and the people involved, to the extent that it is reasonably available.

(f) Carrying out appropriate **due diligence on any Partners**, which may include ensuring they have appropriate controls and safeguarding measures in place, meet any applicable international standards in carrying out their activities, and integrating safeguarding and onward reporting requirements in the Charity's partnership agreements, taking account of the Charity Commission's relevant guidance.²

(g) Ensuring all Staff and Trustees are aware of their responsibilities to **report concerns** and of steps to take/who to go to report such concerns and ensuring that safeguarding concerns are addressed promptly and through the appropriate channels.

(h) Reporting safeguarding incidents, allegations or concerns to **external authorities and regulators**, as appropriate, and in accordance with best practice. The Charity will fully risk assess such reporting to ensure that making a report is not likely to cause further harm to the individual(s) to whom harm has (actually, allegedly or potentially) already been caused.

(i) Ensuring that its **privacy policy** remains suitably updated so that it is clear that it will report wrongdoing on the part of its trustees, Staff and Partners to appropriate authorities; will share such information as may be necessary to protect individuals from harm; and will provide fair and accurate

² The Charity Commission has published guidance "Charities: due diligence, monitoring and verifying the end use of charitable funds" which is updated from time to time and available at:
<https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds>.

references, which appropriately reflect the Charity's experience and interaction with trustees, Staff and Partners.

9. Safer recruitment

9.1 The Charity has been established quickly to meet an urgent need in a fast-paced and challenging environment. The Charity has therefore adopted the safer recruitment processes set out below in order to balance the need to protect beneficiaries from harm from Staff whilst ensuring that the processes do not present a disproportionate barrier to the Charity responding promptly to urgent need from its beneficiaries.

Staff based in the UK

9.2 **Higher-Level DBS Checks:** The Charity does not expect any of its Staff based in the UK to be engaged in roles which would be eligible for Higher-Level DBS Checks. This will be kept under review, particularly if the Charity expands its activities. Where a UK-based role is eligible for a Higher-Level DBS Check, the Charity shall carry out the highest level of those checks for which the role is eligible.

9.3 **Basic DBS Checks:** The Charity will carry out a risk assessment to decide whether any Staff based in the UK should be required to undergo a basic DBS check³. Relevant risk factors include:

- (a) whether the post-holder may have any contact with children or adults at risk (including online);
- (b) the nature, length, and frequency of the contact; and
- (c) whether the contact would be supervised or unsupervised.

9.4 The Charity will also consider the risk factors set out above to determine whether it would be appropriate to:

9.4.1 conduct an interview which includes asking the candidate about their understanding of the safeguarding requirements of the role;

9.4.2 require at least one written reference;

9.4.3 check qualifications and certifications and consider gaps in work history.

³ A basic DBS check reveals unspent convictions. A basic DBS check can be carried out for any role. Individuals can apply online [here](#).

10. Embedding organisational commitment

10.1 To make its policy commitments a practical reality, the Charity will instigate a range of measures that focus on making sure this policy and associated procedures are in place, that Staff are supported to understand and work within the provisions of the policy, that it is fully and effectively integrated into all the Charity's activities, and that it is subject to monitoring and review.

10.2 The Charity's Staff and Trustees will receive training/briefing on their responsibilities and obligations under this policy and it will form part of the induction for new Staff and Trustees.

10.3 Staff and Trustees will be expected to acknowledge and accept their responsibilities under this policy. Breaches of this policy by Staff will be treated seriously and will be treated as a potential cause for disciplinary action or termination of the relationship by other means. Breaches by Trustees may result in the termination of their trusteeship.

11. Reporting and responding to concerns

11.1 Where any safeguarding concern arises, whether because of an occurrence during an activity or arising from a complaint or otherwise, the concern will be treated seriously and dealt with in accordance with this policy.

11.2 When dealing with a safeguarding concern, accusation, or whistleblowing, whether it is from a child or adult, Staff should follow the guidelines set out in the Safeguarding Cribsheet.

11.3 It is not the responsibility of anyone in the Charity to decide whether a child or vulnerable adult has been abused. It is however everyone's responsibility to report concerns and comply with this policy.

12. Next steps to be taken by the Safeguarding Lead

12.1 On notification of a safeguarding concern, the Safeguarding Lead shall consider the circumstances and decide whether further information gathering is required or what other action to take. The Safeguarding Lead will ensure that all concerns are properly recorded, and records kept securely and confidentially and will liaise with statutory safeguarding bodies as required.

13. The Charity works with refugees who recently arrived in Poland having fled the war in Ukraine. It is therefore possible that might exhibit some of the signs of abuse set out in **Appendix 1** because of the extreme difficulties and hardships faced in their escape from Ukraine and as a result of their displacement in Poland. This Safeguarding Lead will have regard to this context when deciding if it would be appropriate or helpful to make a report to external authorities.

13.1 Decisions to report to external authorities (including reports to local law enforcement agencies outside of the UK) will be fully risk assessed and anonymisation/pseudonymisation considered when necessary.

13.2 The Safeguarding Lead shall take steps to ensure that the individual who made the disclosure has access to appropriate ongoing support. They should also offer support to the Charity representative who made the initial disclosure.

14. Responding to a disclosure relating to abuse allegedly perpetrated by the Charity's Staff

14.1 Any suspicion of or disclosure about abuse allegedly perpetrated by a member of Staff must be reported to the Safeguarding Lead on the same working day where possible and not later than the next working day. In the absence of the Safeguarding Lead, or if the report is about the Safeguarding Lead, the report shall be made to the Safeguarding Trustee.

14.2 In responding to a disclosure about abuse allegedly perpetrated by member of Staff, the Charity will take robust steps to respond to the disclosure. The Charity will report the disclosure to the police or other statutory authority, as appropriate. Where this is the case, a written record of the date and time of the report shall be made. The individual who is the subject of the disclosure will also be subject to internal disciplinary action.

15. Reporting serious incidents to the Charity Commission and other external bodies

15.1 The Charity is committed to reporting all relevant incidents to the Charity Commission for England and Wales via a serious incident report in accordance with its Reporting of Serious Incidents Policy.⁴

15.2 The Charity will also report incidents to other regulatory bodies and government departments or funding bodies, where appropriate. Where there is evidence that criminal activity may have taken place, or concerns have been raised in relation to a child or vulnerable adult, the Charity will report to the relevant police and/or safeguarding authorities as appropriate, taking appropriate account of the Charity Commission's guidance in this respect.⁵

⁴ The Charity Commission has published guidance as to what constitutes a serious incident and how to make a report, which is updated from time to time and available at <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>.

⁵ The Charity Commission has published guidance on the criminal reporting of safeguarding offences (including overseas), which is updated from time to time and available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780835/Criminal_reporting_of_safeguarding_offences_including_overseas_v3.pdf.

15.3 Reporting will not be avoided on the basis that it may harm the Charity's reputation or give rise to litigation and any concerns in relation to data protection will not act as a barrier to reporting, although they will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.

16. Publishing this policy

16.1 The Charity will ensure that this policy is always publicly accessible on its website.

17. Review

18. The Charity is committed to reviewing this policy and good practice regularly. This policy will be reviewed by the Trustees at least annually or when an incident occurs that highlights a need for change – whichever occurs first.

Date of policy:

This policy will be next reviewed no later than: 01 June 2023