



Community Foundation

SAFEGUARDING POLICY

1. PURPOSE AND SCOPE

- 1.1 The Community Foundation serving Tyne & Wear and Northumberland (the Foundation) is committed to protecting people in contact with our organisation from risk of harm, including those within our organisation and at those we fund. We have policies and procedures for this, including on recruitment, conduct, bullying and harassment, health and safety, risk, complaints and whistleblowing. This policy sets out the approach to, and responsibilities for, safeguarding at the Foundation.
- 1.2 The policy and associated procedures apply to anyone acting on behalf of the organisation, including all employees (including secondees and those on work experience), trustees (directors), volunteers (including committee co-optees and grant panel members) and consultants.

2. DEFINITIONS

- 2.1 Safeguarding means protecting people's health, well-being and rights so that everyone – especially children and adults at risk – can live free from abuse, harm and neglect.
- 2.2 Safeguarding is covered by legislation and related regulations including, and most relevant to us, the Charity Commission 2022 guidance [‘Safeguarding and protecting people for charities and trustees’](#) and the HM Government 2018 guidance [‘Working together to safeguard children’](#). We also aim to support statutory requirements under the Children Acts 1989 and 2004, the Counter-Terrorism and Security Act 2015 and the Care Act 2014.
- 2.3 A **child** is as anyone under the age of 18. An **adult at risk** is any person aged 18 or over at risk of abuse or neglect but who is unable to protect themselves because of their need for care and support.
- 2.4 Key safeguarding risks in our work include but are not limited to:
 - intentional harm from people in organisations we fund to their intended beneficiaries or wider public;
 - harm arising from poorly designed projects we support;
 - those acting on our behalf doing harm to staff, volunteers or intended beneficiaries in organisations we support;
 - bullying, harassment, unlawful discrimination or other forms of abuse within our staff, trustee or volunteer team.

- 2.5 Safeguarding concerns for us could arise in relation to:
- organisations applying for or receiving funding;
 - children or adults at risk applying for or receiving individual grants;
 - members, donors or potential donors;
 - those acting on our behalf including staff, volunteers and trustees

3. PRINCIPLES

- 3.1 We will make all efforts to comply with the Charity Commissions' guidance on safeguarding. We must be confident that every organisation we fund has in place adequate safeguarding policies and procedures, whether or not they are a charity. We will have written funding agreements setting out the role of each organisation, responsibilities for safeguarding and relevant monitoring and reporting arrangements.
- 3.2 Most organisations we fund support people experiencing or at risk of disadvantage or discrimination. Many will be at higher risk of neglect, abuse and exploitation. So, dealing with safeguarding concerns is common for organisations we fund, and not a sign of failure. When looking at safeguarding, we will encourage applicants and grantees to be open about issues and to learn from them.
- 3.3 While safeguarding is a key part of our grant process, the Foundation will not directly advise organisations on effective safeguarding practice. Instead, we will signpost organisations to appropriate sources of advice and training including the Local Safeguarding Children Partnership or Safeguarding Adults Board. Similarly, we are not responsible for making arrangements to protect people affected by harm in grantee organisations, but we will make appropriate referrals to statutory agencies if necessary.
- 3.4 We will risk assess all our roles considering the working environment to determine if they are eligible for a check and if so, at what level. No trustee, staff or volunteer roles at the Foundation are involved in regulated activity relating to children or adults at risk. Therefore, they are not eligible for enhanced Disclosure or Barring Service (DBS) checks. We will seek a basic or standard check for roles where our risk assessment suggests they may have frequent contact with children or adults with care and support needs.
- 3.5 We will share information about the right to be safe and safeguarding practices to all engaged in our work, including through induction and training. Any new staff member or volunteer will, as a minimum, be provided with this and any related policies.
- 3.6 We will provide effective management for staff and those acting on our behalf through supervision, support and quality assurance. Anyone who believes they are not receiving the support necessary to meet their safeguarding duties should raise this with their line manager as appropriate without fear of penalty or victimisation.
- 3.7 Those designing new programmes, projects or activity will ensure risks of harm are identified and designed with safeguarding in mind, and regularly reviewed as part of monitoring activities.

3.8 We will ensure that risks of harm from our online and digital activities are effectively managed. In line with our information security and acceptable use of ICT policy, we will put in place appropriate technical solutions, including security, filtering and monitoring, to reduce access to inappropriate content on devices or platforms owned or used by our team members. We will also consider risks of harm for those who engage in our online activities, seeking to ensure awareness of safety proportionate to potential risks. Those acting on our behalf must follow the terms and conditions of third-party platforms and applications they use and take reasonable steps to report any safeguarding concerns.

4. SAFEGUARDING AND GRANT-MAKING TO ORGANISATIONS

4.1 As set out in our grant-making policy, the Foundation requires grant applicants to demonstrate that they are committed to safeguarding and to have adequate policies and procedures in place. **All organisations** must demonstrate the following on safeguarding.

- A commitment to protecting trustees, staff, volunteers and beneficiaries from harm.
- Practices that ensure everyone in the organisation is made aware of safeguarding.
- Policies that are publicly available, regularly reviewed and put into practice.
- Suitable health and safety, conduct, welfare and discipline arrangements.
- Procedures so people can raise concerns or complaints, for whistleblowing, for handling allegations and incidents, and for reporting to relevant authorities.

For organisations working directly with children or adults at risk, we also require there to be an appropriately trained designated safeguarding lead (DSL), evidence of regular safeguarding training for all staff and volunteers and clear policies and evidence of implementation for assessing whether checks are needed for each role paid or unpaid.

- 4.2 We will reject applications where the above requirements are not clearly demonstrated. But we may refer organisations to sources of advice and training. Where safeguarding arrangements are in place but require minor improvements, we may offer funding but with the condition that the organisation makes such changes before we award the grant.
- 4.3 Because of the nature of the beneficiary group or proposed activities (e.g. helping young people involved in the sex industry), some grant applications may present additional significant safeguarding risks even where the organisation's policies and procedures are appropriate. Such grants will be referred to the Board in line with the grant-making policy.
- 4.4 Our grant terms and conditions require grantees to maintain adequate safeguarding policies and procedures, and to notify us of any safeguarding concerns and how they have been dealt with. We also ask about safeguarding on review visits to grantees. Lack of response to safeguarding concerns, or failure to disclose them to us, may mean we will not consider further funding to an organisation until improvements are made.
- 4.5 Grantees are responsible for managing safeguarding concerns connected to their activities. The Foundation will only act where a grantee is unwilling or unable to act and any failure to intervene by the Foundation may place individuals at risk of further harm.

5. SAFEGUARDING AND GRANT-MAKING TO INDIVIDUALS

- 5.1 The Foundation has some funds which award grants to individuals who may include children and adults at risk. Our approach when setting up and managing such funds is to require the involvement of appropriate adults (parents, guardians, carers or representatives of statutory bodies) as referrers and intermediaries.
- 5.2 In a few cases, a staff member's role may involve telephone contact with children or adults at risk to assess applications from them as individuals. This does not count as work with children or adults that is eligible for a standard or enhanced DBS check. However, we will assess risks in such roles and may ask for a basic DBS check.

6. OTHER FOUNDATION CONTACT WITH CHILDREN OR ADULTS AT RISK

- 6.1 The Community Foundation may also have direct contact with children and adults at risk when running events and meetings, visiting funded organisations, and meeting donors.
- 6.2 As well as following our codes of conduct, those in contact with children and adults at risk are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions. They should work and be seen to work openly and transparently, including self-reporting if their conduct falls short of expected standards of behaviour.
- 6.3 In addition to our normal risk assessments, we do the following.
- Trustees, employees and volunteers are not permitted to be left in sole contact with children or adults at risk when travelling to or visiting an organisation or a donor, or when attending an event. They must refuse to do so if asked.
 - Children and adults at risk at Foundation events or meetings must be accompanied by an appropriate representative of an organisation whose safeguarding arrangements we have checked, or by a family member or carer. We will take reasonable steps to ensure we know who is attending any event or meeting in advance.
- 6.4 The Foundation's donor experience manual has guidance for dealing with adult donors who are at risk which staff must follow. We will amend or end communication with individuals if we are made aware of a vulnerability within the definition in this policy.

7. DEALING WITH SAFEGUARDING CONCERNS

- 7.1 Someone acting on the Foundation's behalf, including a trustee, staff member or volunteer, may become aware of a safeguarding concern because:
- a grantee has reported an incident at their organisation to us;
 - a whistle-blower or member of the public raises a concern about a grantee;
 - an allegation is about the conduct of someone acting on the Foundation's behalf;
 - an individual (e.g. an employee, a trustee, a volunteer, a donor or a beneficiary of a grantee) discloses a concern about themselves; or
 - we observe something of concern ourselves.

All staff, trustees, volunteers and others acting on our behalf are responsible for reporting all concerns, allegations or disclosures of abuse, harm and neglect.

- 7.2 In the case that someone acting on our behalf believes there is a significant risk of immediate harm to a person, they should contact and share relevant information with appropriate agencies as soon as possible (e.g. social services, mental health crisis team, police, etc.) and then inform the Foundation's Designated Safeguarding Lead (DSL) which is the Chief Funding and Partnerships Officer, of the action taken and any follow up contacts.
- 7.3 In any of these circumstances, the person who first becomes aware of the safeguarding concern must inform the Foundation's DSL within one working day, providing as much information as possible. (Unless there is a significant risk of immediate harm – see below.) The DSL, or the Chief Finance and Operating Officer (CFOO) or Chief Philanthropy Officer (COO) if the DSL is not available, will record the concern and follow up with the person raising it within two working days.
- 7.4 Where necessary, the DSL will also trigger the Foundation's crisis management procedure. There are several possible actions.
- If the concern relates to (or is notified to us by) a funded organisation, the DSL will normally contact its safeguarding lead, chair or most senior employee and require follow up from them to give assurance that appropriate measures to investigate the concern have been taken, including notifying relevant statutory agencies.
 - If the DSL has reason to think that an organisation may not deal appropriately with a concern raised, or the organisation fails to follow notification procedures or provide follow up to us, or it is considered that the Foundation might reasonably be expected to do so, they may decide to inform relevant statutory agencies directly.
 - If the concern relates to an external person not linked to a funded organisation, the DSL will refer the matter directly to the appropriate statutory agency (if appropriate) or signpost to other support or welfare services.
 - If the concern relates to alleged conduct by an employee, volunteer or trustee of the Foundation, the DSL will report the matter to the CEO (or in their absence, or if the allegation is about the CEO, to the Chief Finance and Operating Officer). As well as appropriate referrals to statutory agencies, action may be taken in line with the Foundation's wider policies and procedures, including its disciplinary procedures.
- 7.5 In managing the concern, the DSL is responsible for:
- ensuring engagement with agencies with skills, duties or powers to best take action;
 - considering any further support the Foundation could and should offer those affected by the concern;
 - when an allegation is made about an individual connected to the organisation, considering whether to inform the subject of concern and if so, who and how this should be done and what further support to provide;
 - providing relevant and appropriate information to the Foundation's CEO and Board, including advice as to whether a report to the Charity Commission is required;
 - capturing any learning and using this in future policy and procedure reviews;

- ensuring a confidential recording system for safeguarding concerns and keeping or destroying records in line with the Foundation's confidentiality and data protection policies.

8. RESPONSIBILITY FOR IMPLEMENTING THIS POLICY

- 8.1 Overall responsibility for this policy lies with the Foundation's Board of trustees. The trustees have delegated operational responsibility to the Chief Funding and Partnerships Officer who is the Foundation's designated safeguarding lead (DSL). In their absence, or where any concerns relate to them, the Chief Finance and Operating Officer or Chief Philanthropy Officer takes the DSL role.
- 8.2 The DSL's responsibilities are to ensure:
- employees are made aware of this policy and related procedures, and receive appropriate information on recognising signs of abuse and dealing with disclosures;
 - maintained awareness of local authority safeguarding children partnership or safeguarding adults board and their relevant local procedures and thresholds;
 - any concerns raised or reported are discussed, recorded and dealt with appropriately and where necessary referred to the appropriate statutory agencies procedures are reviewed, and the policy updated as agreed at least annually.
- 8.3 All employees, trustees and volunteers are responsible for ensuring that they are familiar with this policy and any related procedures.

9. BREACHES OF THE POLICY

- 9.1 Concerns around safeguarding should be dealt with as above. Where the concern is not around safeguarding but other aspects of compliance with this policy, employees and trustees must notify the Chief Finance and Operating Officer as soon as possible. Volunteers should notify their normal point of contact within the Foundation in the first instance. Where any concern relates to the Chief Finance and Operating Officer, either the Chief Executive or Chair of the Board should be notified.
- 9.2 Any alleged breach of this policy by an employee will be dealt with under the Foundation's disciplinary procedure and could result in dismissal for gross misconduct.
- 9.3 Any alleged breach by a trustee will be investigated by the Governance, Finance and Audit Committee in the first instance and could result in disqualification from the Board.
- 9.4 Any alleged breach by volunteers or others associated with the Foundation will be investigated by the Chief Finance and Operating Officer and could result in individuals being removed from voluntary roles or contracts being terminated.

10. MONITORING AND REVIEW

- 10.1 The Foundation's executive team will monitor the effectiveness of this policy and review it annually to ensure its suitability, adequacy and effectiveness. Any improvements

identified will be reported to the Board and necessary changes agreed. The policy will in any case be reviewed by the Board every three years.

Date originally approved by Board	March 2017 (Children & Vulnerable Adults Policy)
This version	4
Date last updated	June 2024
Reason for last update	Updated for change of job title
Next review due	June 2025 by executive June 2026 by Board of trustees
Owner	Adam Lopardo
Job title	Chief Funding and Partnerships Officer
Related procedures (if applicable)	<ul style="list-style-type: none"> • Grants manual • Donor experience manual • Grant-making policy • Crisis management procedure • Gift acceptance policy • Data protection and privacy policy and procedures • Employee handbook and code of conduct • Trustee code of conduct • Complaints procedures • Whistleblowing policy