



Adult safeguarding policy, guidance and procedures

Adult Safeguarding Policy

Policy Overview

The Charity Commission asserts that safeguarding policy and procedures are vital for the effective operation of any charity that works with vulnerable groups.

This policy applies to all staff, volunteers and trustees at The Compassionate Friends (TCF). It also applies to all situations where The Compassionate Friends supports bereaved parents, adult siblings and grandparents in person, on the telephone and online, as well as at fundraising events and in our national office.

The guidance in this policy helps TCF trustees, volunteers and staff identify serious incidents. It also explains how to report them and what to report.

Policy Scope

This policy and procedure covers all staff, volunteers, trustees and areas of work and layers of support provided by TCF.

Safeguarding means protecting a person's right to live in safety, free from abuse and neglect.

TCF believes that no adult, bereaved or otherwise, should experience abuse of any kind. TCF has a responsibility to promote the welfare of all adults and to keep them safe. We are committed to practice in a way that protects people. We work to make sure that people's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

TCF know that bereaved parents and close family members can often be in a very vulnerable state having suffered the traumatic event of the death of their child, sibling or grandchild.

TCF recognises that:

- The welfare of people is paramount.
- All persons, regardless of age, ability, gender, racial heritage, religious belief, sexual orientation, sexual identity, social and economic circumstances have a right to equal protection from all types of harm or abuse.
- Some people are especially vulnerable because of the impact of their bereavement, the impact of previous experiences, their level of dependency, communication needs or other issues.

TCF seeks to keep bereaved parents and their families safe by:

- Valuing them, listening to them and respecting them.
- Adopting safeguarding practices, as in staff contracts, trustee code of practice and the volunteer agreement which includes confidentiality requirements, a code of conduct and has regard to the EDI Policy.
- Providing effective management for staff and volunteers through supervision, support and training and quality assurance surveys.
- Recruiting staff and volunteers safely, ensuring that all necessary checks are made, including an Enhanced Disclosure.
- Recording and storing information professionally and securely, and sharing information about

safeguarding and good practice with bereaved parents, their families, staff and volunteers.

- Using our safeguarding procedures to manage any allegations against staff, trustees and volunteers appropriately.
- Creating and maintaining an anti-bullying environment and ensuring that TCF has a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensuring that TCF has effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe physical environment for staff and volunteers, and bereaved parents siblings and grandparents, by applying health and safety measures in accordance with the law and regulatory guidance.

TCF volunteers, trustees and staff will be familiar with local services and support for safeguarding vulnerable and have internal procedures to direct staff, volunteers or trustees on what to do if they encounter abuse. Staff, volunteers and trustees that they must share information in cases of abuse. All staff and volunteers in our organisation who have contact with adults who could be at risk of abuse or neglect have a duty to act if they have any concern that an adult is being abused, neglected, or exploited.

Guiding Principles

There are 2 main elements in The Compassionate Friend's safeguarding work:

Prevention – TCF has put sensible measures in place to prevent abuse, including the use of safe recruitment practices, promoting safe working environments and raising awareness of safeguarding for staff, volunteers and trustees. We are committed to equity, diversity and inclusion practices for all staff, volunteer and trustee applications and aim to select people based on their skills, abilities, experience, knowledge and, where needed, qualifications and training.

Protection – The Compassionate Friends will provide policy, procedures, information and training to enable all TCF staff, volunteers and trustees to identify and respond appropriately to concerns about abuse that may be affecting an adult who needs care and support.

Where there are reasonable doubts about the ability of the person raising concerns to obtain the right support for themselves or others, or where allegations concerning The Compassionate Friends staff or volunteers are raised, more complex responses may be required. Detailed information on how all safeguarding issues should be managed within The Compassionate Friends can be found in this Adult Safeguarding Policy, Guidance & Procedures.

Roles & Responsibilities – reporting procedures

Staff and volunteers

Every individual working or volunteering for TCF, irrespective of their role, has a part to play in safeguarding adults from abuse. All staff, volunteers and trustees will undertake relevant training and must familiarise themselves with our Safeguarding Policy, Guidance and Procedures. **Staff and volunteers must report safeguarding concerns to their manager, in the first instance, (using the Safeguarding Concern Form) who should then report to the CEO.**

Beneficiaries or others who are in contact with TCF

Beneficiaries and others should report safeguarding concerns in the first instance to a TCF volunteer, who will report the concern to their manager.

CEO

The CEO will receive reports from managers of safeguarding concerns. The CEO will take appropriate action.

The CEO will ensure that all staff and volunteers are adequately trained to recognise signs of abuse and will promote the discussion of safeguarding at team meetings and as part of one-to-one meetings.

Decisions about reporting safeguarding incidents made by the CEO should be reported to trustees (particularly where incidents were 'borderline' and making a report was considered but it was decided not to make one).

Trustees

The Trustees of The Compassionate Friends have responsibility for the general control and management of the administration of the charity. Trustees of TCF have a duty of care to their charity, which includes taking the necessary steps to safeguard those at risk from abuse, managing risk and protecting the reputation of the charity.

Trustees will ensure that safeguarding is included, where appropriate, in the strategic plans, risk assessments, communications and quality assurance processes of TCF. In some cases, they will be required to make decisions in relation to complex or serious safeguarding concerns, in consultation with the CEO.

Breaches of Policy

Failure to comply with TCF safeguarding policy, guidance and procedures may be managed in a number of ways, depending on the nature and consequences of any incident. In some cases, a combination of responses may be required.

- Disciplinary process – where there are concerns regarding staff misconduct or competence.
- TCF coordinated safeguarding investigation – where concerns about the actions or inactions of a member of staff, volunteer or trustee necessitate referral to the adult safeguarding team where the abuse is alleged to have taken place. This may also result in referral to Disclosure & Barring Service
- Police led investigation – where the actions or inactions of a member of staff or volunteer appear to be criminal in nature.
- Serious incident reporting to The Charity Commission.
- Additional or repeat training – where the concern does not meet the threshold for the processes outlined above but does indicate a need for further development of safeguarding competence.

Safeguarding Guidance and Procedures

The responsibility to report a serious incident

The Charity Commission requires charities to report serious incidents. If a serious incident takes place within TCF, it is important that there is prompt, full and frank disclosure to the Commission. Individuals need to report what happened and, importantly, let the Commission know how TCF are dealing with it, even if the incident has also been reported to statutory authorities, the police, donors or another regulator.

What is classed as a serious incident

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to TCF's beneficiaries, staff, volunteers, trustees or others who come into contact with TCF through its work (who are collectively referred to throughout this guidance as people who come into contact with your charity through its work)
- loss of TCF's money or assets
- damage to TCF's property
- harm to TCF's work or reputation

For the purposes of this guidance, "significant" means significant in the context of TCF, taking account of its staff,

operations, finances and/or reputation.

Given the challenging nature of the work undertaken and the difficult context faced by TCF, the Commission understands that serious incidents occur. When something serious happens, it is the Commission's role to ensure that trustees comply with their legal duties and that the charity manages the incident responsibly. This means the Commission will be looking for assurance that the charity has taken steps to limit the immediate impact of the incident and, where possible, prevent it from happening again.

- Most problems can be resolved by CEO or trustees themselves, in some cases with timely advice from professional advisers.
- Sometimes the Commission will use its powers to protect charity. Taking action quickly will help protect TCF from further harm.
- Reporting also means the Commission can identify whether other charities might be affected and can give better advice to all charities to help them protect themselves.

What to report

This section covers what types of incidents the Commission expects TCF to report and outlines the different authorities.

TCF will report an incident if it results in, or risks, significant:

- harm to people who come into contact with TCF through its work
- loss of TCF's money or assets
- damage to the TCF's property
- harm to the TCF's work or reputation

The main categories of reportable incident are:

- protecting people and safeguarding incidents
- financial crimes – fraud, theft, cyber-crime and money laundering
- large donations from an unknown or unverifiable source, or suspicious financial activity using the charity's funds
- other significant financial loss
- links to terrorism or extremism, including 'proscribed' (or banned) organisations, individuals subject to an asset freeze, or kidnapping of staff
- other significant incidents, such as – insolvency, forced withdrawal of banking services without an alternative, significant data breaches/losses or incidents involving partners that materially affect TCF.

It is the responsibility of the CEO in the first instance to decide whether an incident is significant and should be reported. To help, they will refer to the guidance found in the following link:

<https://register-of-charities.charitycommission.gov.uk/reporting-or-updating-a-serious-incident>

When to report

- TCF will report an actual or alleged incident promptly. This means as soon as is reasonably possible after it happens, or immediately after TCF becomes aware of it.
- If serious wrongdoing is suspected within TCF and the charity fails to deal with the concerns appropriately and as set out in the Safeguarding Policy, then individuals should refer to TCF's Whistleblowing Policy.

Where to report

TCF will report a significant safeguarding incident as outlined above to the Charity Commission at:

<https://register-of-charities.charitycommission.gov.uk/reporting-or-updating-a-serious-incident>

Taking action - Safeguarding Malpractice

Staff, volunteers or have suspicions or concerns that safeguarding malpractice has occurred, shall follow the charity's Whistleblowing Policy, in the first instance.

A beneficiary or another person who has come into contact with TCF who has suspicions or concerns that safeguarding malpractice has occurred, shall contact the CEO of TCF, who shall ensure the charity's whistleblowing procedures are implemented. Should the whistleblower feel unable to raise their concerns with the CEO, they should contact the relevant trustee of TCF. If the whistleblower feels unable to raise their concerns with TCF directly, they may raise the issue with the Charity Commission.

TCF will ensure serious safeguarding incidents are reported adequately and appropriately to the Charity Commission via a Serious Incident Report (SIR). Reports to other external authorities, police and regulators will be made as is appropriate to the safeguarding incident. Decisions regarding whether reports to external authorities, other than the Charity Commission, will be fully risk assessed and not made if they are likely to cause further harm to the victim/survivors, or due process or the rule of law is not reasonably assured. A SIR will be made in any event and will include an explanation of TCF's decisions on other external reporting.

Recording and Reporting Suspected Incidents and Dealing with Concerns under Safeguarding Malpractice

- If an injury occurs to an adult during a TCF supportive event, training or while working or volunteering for the charity, the incident should be documented on an accident/incident form. If emergency medical attention is required contact appropriate emergency services.
- Any marks or bruising noted should be described in detail and recorded on a body map. For details of injuries which would be suspected as non – accidental these should be reported immediately to TCF's CEO.
- Great care should be taken in how details are recorded:
 - Description should be factual, e.g., Bruise on.....,
 - Do not make any judgements as to how the injury has occurred.
 - Use the person's own words as appropriate.
 - Record any discussion with next-of-kin or the family.
 - Record the internal discussion with agreed outcome and if further action is to be taken, who will action this and when.
- If the outcome is to take no further action this needs to be noted.

Should an adult disclose abuse, it is vital to explain to them as quickly as possible that you cannot keep this information confidential. Even if they ask you to "keep a secret" you will have to pass on the information to the relevant agencies in accordance with procedures and legal requirements.

Concerns Arising from visiting an adult at home or in public place:

- If staff, volunteers or trustees suspect that abuse may have occurred but do not consider that the person is in immediate danger they should discuss their concerns as soon as possible with their Volunteer Manager and in their absence with the CEO.
- Concerns should be recorded factually.
- The appropriate safeguarding agency in the person's locality should be contacted to proceed with any action or investigation.

- If there is immediate cause for concern regarding the safety and wellbeing of the person this should be expressed to the next of kin and appropriate action suggested.
- If the next of kin refuse to take action and TCF remains concerned about the immediate safety and wellbeing of the person the relevant local authority statutory bodies must be informed, who will then take appropriate action.

Taking action - Reporting criminal activity

If a reportable incident involves actual or alleged criminal activity, then TCF will report it to the relevant agencies:

- **Safeguarding incidents:** TCF will report allegations or incidents of abuse or mistreatment of people who come into contact with the charity through its work to:
 - the police and obtain a crime reference number (call 101 or make a report at local police station), and
 - the local authority and other relevant agencies
- **Fraud and cyber-crime:** TCF will report allegations or incidents of fraud and cyber-crime to Action Fraud via its online reporting tool, obtaining a crime reference number and will make clear that you representing a charity.
- **Theft:** TCF will report allegations or incidents of theft to the police either through 101 or making a report at a local police station. TCF will obtain a crime reference number.
- **Links to terrorism and extremism:** TCF will immediately report links or alleged links to terrorism and extremism to the police and obtain a crime reference number. The charity will report this type of incident to the police in the following ways:
 - via the National Crime Agency website
 - call the Metropolitan Police Anti-Terrorist Hotline on 0800 789 321
 - call 101 or report it at a local police station

An incident that involves actual or alleged criminal activity will usually be reportable to the Commission. Only in exceptional circumstances, such as where the crime and the impact on TCF are minor for example one-off theft of a very small amount of money, will the Commission consider an incident involving criminal activity is not reportable.

Types of safeguarding incident to report

The Charity needs to make a report to the Commission if a serious safeguarding risk materialises.

A report will always be made where the level of harm to the victims and/or the likely damage to the reputation of or public trust in the charity is particularly high (for example, sexual misconduct by the charity's CEO or another person in a senior position or position of specific responsibility, such as a trustee). The Commission would also expect to receive a report if the number and nature of staffing incidents indicate there are widespread or systematic issues connected to sexual harassment, abuse and/or other misconduct in a charity.

The Commission's role in relation to safeguarding incidents

The Commission's role is to ensure the charity's trustees are handling the incident appropriately and, where necessary, putting in place improved governance and internal controls, in order to prevent further harm.

The Commission is not responsible for dealing with incidents of actual abuse or mistreatment and it does not administer safeguarding legislation. It cannot prosecute or bring criminal proceedings, although it may refer concerns on to 'lead agencies', such as the police, local authorities and the Disclosure and Barring Service (DBS), as well as to specialist bodies responsible for designated areas, such as education or health and social care.

Help and advice can be sought from relevant statutory agencies.

Related policies

This policy sits alongside The Compassionate Friends Trustee Code of Conduct and the policies set out in the Staff Handbook. This includes the following key policies:

- Bullying and Harassment
- Trustees Code of Conduct
- Disciplinary and Grievance
- Whistleblowing
- Privacy and Data Protection
- Equity, Diversity & Inclusion

Associated relevant legislation and guidance

- Charities Act 2011
- Equality Act 2010
- Health and Safety at Work Act 1974
- Human Rights Act 1998
- Protection of Freedoms Act 2012
- Safeguarding Vulnerable Groups Act 2006

Review

Revision history

Version	Type (e.g., replacement, revision etc...)	Date	History (reason for changes)	Signature/Job Title
V1	Original	01/10/2023		
V2	Replacement	01/10/2026	Legislative and compliant update	

This policy will be reviewed triennially or earlier if reasons dictate.