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Safeguarding Policy

Purpose

Our activities may include working with children, young people, and adults at risk. The purpose of this policy is to safeguard their wellbeing and set out the principles and procedures that guide our approach. It provides clarity for stakeholders and the public on how we meet our safeguarding responsibilities.

Safeguarding Lead

A safeguarding lead will be appointed to oversee safeguarding, respond to incidents, and ensure that safeguarding remains a priority in our governance.

ISV Safeguarding Lead: Eimear Davis

Applicability

This policy applies to all individuals working on our behalf, including volunteers.

Partner organisations are expected to have their own safeguarding policies and procedures, which must meet the standards outlined here and any relevant legal or regulatory requirements. Safeguarding should be embedded in our wider policies and risk management processes.

Principles

We are committed to safeguarding and promoting the welfare of all individuals we work with. We believe:

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- No one involved in our work should ever experience abuse, harm, neglect or exploitation.
- Everyone has a responsibility to help keep people safe.
- We must create a culture where people feel safe and able to raise concerns.

Types of Abuse

Abuse may be physical, emotional, sexual, financial, neglectful or institutional. Detailed indicators are listed in Appendix 1.

Reporting Concerns

If someone is in immediate danger, contact the police by dialling 999.

Members of the public or stakeholders should raise any safeguarding concern with a member of our team, who will escalate the matter appropriately.

Volunteers should report concerns to their immediate superior. If that is not possible, they should contact someone more senior within ISV directly.

The ISV leadership team are mindful of their obligations in relation to safeguarding and Serious Incident Reporting, and will act in line with government and regulatory guidance, including:

- Government guidance on handling safeguarding allegations: https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
- https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance
- https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees
- Charity Commission: How to report a serious incident: https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

Responsibilities

Board

The Board will review and approve this policy annually. Directors will follow the Charity Commission's expectations of good safeguarding governance, including:

- 10 actions trustee boards need to take
- Safeguarding duties of charity trustees

The Co-Chairs of the Board will be responsible for oversight of safeguarding, whistleblowing and health and safety, including:

- Promoting a culture of openness, trust and respect
- Reviewing safety annually and recommending improvements
- Ensuring policy compliance and responding to lapses
- Investigating safeguarding incidents promptly and sensitively
- Overseeing safeguarding risk assessments and mitigation actions
- Ensuring safe recruitment, including DBS checks where required
- Planning activities to mitigate safeguarding risks
- Keeping a central register of DBS checks and safeguarding training
- Embedding safeguarding in job descriptions and development plans
- Listening to stakeholders and responding to concerns appropriately
- Storing and managing personal data in compliance with the UK GDPR
- Ensuring consent is obtained for any imagery used

Everyone working with us

Everyone must be familiar with this policy, complete relevant training, remain alert to risks, and report any concerns immediately.

Fundraising

We will ensure fundraising activities are ethical, inclusive and safe. This includes:

- Compliance with the Code of Fundraising Practice: https://www.fundraisingregulator.org.uk/code
- Reference to guidance on fundraising with vulnerable people: https://ciof.org.uk/policy/reports-and-guides/treating-donors-fairly
- Avoiding undue pressure or misleading appeals

- Refusing donations from individuals unable to give informed consent
- Sensitivity to donors' individual needs

Online Safety

We are committed to promoting online safety. This includes:

- Training for volunteers, staff and trustees on safe online conduct
- Using age-appropriate tools and privacy settings
- Protecting personal data in line with data protection law
- Obtaining appropriate consent for the use of images or video
- Providing users with clear guidance on how to report concerns
- Acting in line with our Code of Conduct and adopting the Charity AI Ethics & Governance Framework: https://beneficialai.org.uk/
- Monitoring and moderating content on platforms we manage

Online Safety Act 2023

- Where we host online forums or services:
- We assess and manage risks of exposure to illegal and harmful content
- We remove illegal content promptly
- We display clear terms of use and group rules
- We maintain an accessible reporting and complaints process
- We monitor our forums to ensure a safe environment
- See guidance from Ofcom: Online Safety Act for more details: https://www.ofcom.org.uk/online-safety

Working with Other Organisations

When working in partnership or making grants, we will follow best practice in due diligence and ensure agreements clearly define:

- The roles of each organisation
- Our safeguarding expectations
- Monitoring and reporting arrangements

Policy Review and Version Control

This policy will be reviewed regularly and following any safeguarding incident, legislative change, or other relevant development. Each review will assess the policy's effectiveness and compliance with current standards.

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Isabelle Parasram OBE	June 2025	Initial draft approved	Annually

Appendix 1: Signs of Abuse

Physical Abuse.

- bruises, black eyes, welts, lacerations, and rope marks.
- broken bones.
- open wounds, cuts, punctures, untreated injuries in various stages of healing.
- broken eyeglasses/frames, or any physical signs of being punished or restrained.
- laboratory findings of either an overdose or under dose medications.
- individual's report being hit, slapped, kicked, or mistreated.
- vulnerable adult's sudden change in behaviour.
- a caregiver's refusal to allow visitors to see a vulnerable adult alone.

Sexual Abuse.

- bruises around the breasts or genital area.
- unexplained venereal disease or genital infections.
- unexplained vaginal or anal bleeding.
- torn, stained, or bloody underclothing.
- an individual's report of being sexually assaulted or raped.

Mental Mistreatment/Emotional Abuse.

- being emotionally upset or agitated.
- being extremely withdrawn and non-communicative or non-responsive.
- nervousness around certain people.
- an individual's report of being verbally or mentally mistreated.

Neglect.

- dehydration, malnutrition, untreated bed sores and poor personal hygiene.
- unattended or untreated health problems.

- hazardous or unsafe living condition (e.g., improper wiring, no heat or running water).
- unsanitary and unclean living conditions (e.g., dirt, fleas, lice on person, soiled bedding, faecal/urine smell, inadequate clothing).
- an individual's report of being mistreated.

Self-Neglect.

- dehydration, malnutrition, untreated or improperly attended medical conditions, and poor personal hygiene.
- hazardous or unsafe living conditions.
- unsanitary or unclean living quarters (e.g., animal/insect infestation, no functioning toilet, faecal or urine smell).
- inappropriate and/or inadequate clothing, lack of the necessary medical aids.
- grossly inadequate housing or homelessness.
- inadequate medical care, not taking prescribed medications properly.

Exploitation.

- sudden changes in bank account or banking practice, including an unexplained withdrawal of large sums of money.
- adding additional names on bank signature cards.
- unauthorised withdrawal of funds using an ATM card.
- abrupt changes in a will or other financial documents.
- unexplained disappearance of funds or valuable possessions.
- bills unpaid despite the money being available to pay them.
- forging a signature on financial transactions or for the titles of possessions.
- sudden appearance of previously uninvolved relatives claiming rights to a vulnerable adult's possessions.
- unexplained sudden transfer of assets to a family member or someone outside the family.
- providing services that are not necessary.
- individual's report of exploitation.

Statutory and Regulatory Guidance

Safeguarding duties for charity trustees (Gov.UK)

https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees

10 actions trustee boards need to take (Charity Commission)

https://www.gov.uk/government/publications/charities-how-to-protect-vulnerable-groups-including-children/10-actions-trustee-boards-need-to-take-to-ensure-good-safeguarding-governance

Managing safeguarding risks online (Gov.UK)

https://www.gov.uk/guidance/safeguarding-and-protecting-peoples-health-wellbeing-and-human-rights#managing-safeguarding-risks-online

Information Commissioner's Office (ICO) – Children and the UK GDPR

https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/children-and-the-uk-gdpr/

ICO – Safeguarding and information sharing

https://ico.org.uk/for-organisations/safeguarding-children-young-people-and-vulnerable-adults/

Ofcom – Online Safety Codes of Practice (2025)

https://www.ofcom.org.uk/online-safety

Additional Resources

NSPCC: Writing a safeguarding policy

https://learning.nspcc.org.uk/safeguarding-child-protection/writing-a-safeguarding-policy-statement

Bond: Positive safeguarding culture tool for leaders

https://www.bond.org.uk/resources/developing-and-modelling-a-positive-safeguarding-culture-a-tool-for-leaders/

CHS Alliance: Misconduct Disclosure Scheme

https://www.chsalliance.org/our-work/safeguarding/misconduct-disclosure-scheme/