



**Helping people with locked-in syndrome to live  
their best possible lives**

# **Safeguarding Policy and Procedure**

|   |                          |
|---|--------------------------|
| <b>Status:</b>                            | <b>Active</b>            |
| <b>Date of version:</b>                   | <b>21/10/2020</b>        |
| <b>Responsibility for policy:</b>         | <b>Board of Trustees</b> |
| <b>Responsibility for implementation:</b> | <b>Board of Trustees</b> |
| <b>Responsibility for review:</b>         | <b>Chair</b>             |
| <b>Date for review:</b>                   | <b>05/04/2021</b>        |

## **Introduction and definitions**

The Locked-in Trust believes that the protection of children, young people and vulnerable adults from harm and abuse is everybody's responsibility. It is our aim to create a safe and trusted environment for all who connect with us.

Given the nature of our work as a charitable incorporated organisation (CIO), we do not regularly come into direct face-to-face contact with children, young people or vulnerable adults. But we know that some of our beneficiaries may be in vulnerable circumstances and we recognise that we have a responsibility to ensure that when we do, we protect them in line with the relevant legislation and statutory guidance.

This policy sets out the approach by the Locked-in Trust (1190096) to safeguarding children, young people and vulnerable adults at risk of abuse. For the purpose of this policy, we define children as any person under the age of 18. Vulnerable adults are defined as people aged 18 years or above with need for care and support, and who are either experiencing, or at risk of experiencing, abuse or neglect.

## **Purpose**

The Locked-in Trust fulfils its charitable purposes, primarily by making grants to beneficiaries. Whilst unlikely, it is possible that some of the Locked-in Trust's trustees, employees and volunteers may come into contact with people who are at potential risk of harm, including children, young people and adults whom the law defines as vulnerable. Further, the Charity Commission's guidance notes that "safeguarding goes beyond preventing physical abuse, and includes protecting people from harm generally, including neglect, emotional abuse, exploitation, radicalisation, and the consequences of the misuse of personal data."

The purpose of this policy is to provide trustees, staff and volunteers of the Locked-in Trust with the overarching principles that guide our approach to safeguarding. It also outlines the actions that trustees, staff and volunteers are required to take when dealing with safeguarding concerns.

Above all, our policy aims to ensure that all those who connect with the Locked-in Trust have a positive experience.

## **Policy Statement**

The Locked-in Trust is committed to safeguarding the well-being of all individuals who it comes into contact and its activities. We commit to ensure:

- All concerns or suspicions of a safeguarding nature arising in the course of the Locked-in Trust's work will be taken seriously and responded to swiftly and appropriately;
- All trustees, staff and volunteers are clear about their safeguarding responsibilities and know how to respond to concerns appropriately;
- All children, young people and vulnerable adults, regardless of gender, age, ethnicity, disability, sexuality or beliefs have the right to protection from all types of harm or abuse and the right to be treated with respect and dignity;

- Safe recruitment, selection and vetting for individuals working with the Locked-in Trust whether in a paid or voluntary capacity is undertaken for all affected positions. The following must be obtained where appropriate:
  - Criminal records check where the position is eligible for this;
  - References and checks on gaps in work history;
  - Confirmation that staff can work in the UK.
- Further, in line with the Charity Commission's Guidance, the Locked-in Trust must ensure that trustees, staff and volunteers are suitable and legally able to act in their positions;
- Effective complaints measures are in place;
- An anti-bullying environment is created and maintained and ensure that any bullying that does arise is dealt with effectively;
- All personal information is recorded and stored professionally and securely in line with GDPR compliance requirements;
- We recognise our responsibility to implement, maintain and regularly review procedures which are designed to prevent and to alert the Locked-in Trust to such abuse should it occur.

### **Accountability and responsibility**

Ultimate responsibility for this policy lies with the trustees;

- It is the responsibility of each employee, volunteer or trustee to recognise the signs of potential abuse and to take action if they suspect that someone is being abused;
- We will ensure that everyone across the charity receives training in safeguarding which is appropriate to the role they are undertaking and that they are clear about the process to follow if they are concerned about the welfare of a volunteer, employee, trustee or beneficiary.
- All trustees, staff and volunteers have duties in relation to safeguarding and a duty to know what action to take if an individual is at risk as a result of issues arising in the course of the Locked-in Trust's work.

It is essential that all trustees, staff and volunteers:

- Take all reasonable steps to ensure that they do not have unsupervised access to children, young people or vulnerable adults during the course of working for the Locked-in Trust;
- Consider any potential safeguarding issues when planning new activities and when assessing any potential beneficiaries;
- Report any safeguarding concerns promptly to the Board of Trustees.

The Charity will ensure that appropriate procedures are in place for keeping records of any safeguarding concerns reported with due regard to confidentiality and for monitoring areas of activity in which safeguarding concerns have arisen.

This policy will be kept up to date to reflect changes in legislation/best practice and will be reviewed annually by the Trustees.

### **Raising a safeguarding concern**

All trustees, staff and volunteers are asked to raise any concerns regarding safeguarding using any of the following routes:

Referring the issue immediately to the Board of Trustees.

If working with another organisation, by reporting the concern to their safeguarding lead officer as well as to the Board of Trustees.

If the situation is urgent or immediately dangerous to an individual, contact the police on 999.

### **Preventing and identifying abuse by employees, volunteers and trustees**

At Locked-in Trust, we work to ensure the safety of everyone that we come into contact with, in the course of our charitable purposes. We have rigorous procedures in place to ensure that the individuals who are recruited into posts are fit and suitable for those posts and we have robust policies which enable us to quickly follow-up any allegations about the conduct of our employees, volunteers and trustees.

#### ***Recruitment and pre-appointment checks***

During the recruitment process, The Locked-in Trust will always check an individual's suitability for working with us.

At this stage, we analyse application forms and CVs to assess that the individual has the appropriate skills, knowledge and background to undertake the duties of the post they are applying for.

When an offer of employment is made, we check the individual's suitability for the post through occupational reference checking. Individuals have to provide two referees, one of whom must be their last employer. Where any information is falsely submitted or where information is provided which gives cause for concern we may withdraw any conditional offer of employment if considered necessary.

#### ***Criminal record checks***

There are legal restrictions under safeguarding legislation on who can be involved in working with children, young people and vulnerable adults. The trustees have a responsibility to:

Make sure that trustees, employees and volunteers are suitable to work with children, young people and vulnerable adults.

Request appropriate checks from the Disclosure and Barring Service where the role is eligible.

Check that the individuals are legally able to act in the position to which they are appointed and are able to work legally in the UK.

#### ***Setting clear expectations of employee, volunteer, and trustee behaviour***

We set clear expectations about acceptable behaviour and communicates these through:

- Employment contracts where applicable;
- Volunteer policy and agreement;
- IT/digital policy;
- Providing guidance on responsible fundraising;
- Providing guidelines for supporters raising money in aid of Locked-in Trust;
- Providing training on safeguarding and acceptable conduct when working with children, young people and vulnerable adults.

### ***Supporting the identification and reporting of abuse***

At Locked-in Trust, we will seek to ensure that volunteers, trustees, members of the public, children and young people, parents, carers, beneficiaries and our employees have ready access to us if they have concerns about the conduct of any of our employees, volunteers and trustees or those undertaking work on our behalf.

A complaint about the conduct of an employee, volunteer or trustee may come through various routes. These include:

- Through our formal complaints procedure;
- Through other correspondence from the public;
- Through our website;
- Through an employee, volunteer or trustee making a complaint about the conduct of another employee, volunteer or trustee.

The Board of Trustees will work to ensure that any safeguarding concern is dealt with quickly and appropriately.

The Locked-in Trust will ensure that all complaints are treated with due care and attention, considering the expectations of the public and also the fair treatment of our volunteers, trustees and employees.

Where the complaint involves a safeguarding issue, this should immediately be referred to the Designated Safeguarding Officer (DSO), who will take the appropriate action. If this involves an allegation about a volunteer, trustee or employee, they will immediately refer this to the Chair of Trustees immediately.

The Locked-in Trust will always make it clear to members of the public that there is no restriction on them reporting an incident to a relevant body such as the police or the Charity Commission if they do not feel comfortable making a direct complaint to the Locked-in Trust.

