

Document Information

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Version Control

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V2.0	Nicola Turner	March 2023	Annual review and updated branding.
V2.1	Nicola Turner	September 2023	Addition of provision for Prevent Duty to the policy statement
V2.2	Camila Pocard	September 2024	Updated Branding
V3.0	Shah Begum and Camila Pocard	September 2025	Policy reviewed and refreshed. New section added on photography and videography

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Policy Statement

United By 2022 Charity (“UB22”) acknowledges the duty of care to safeguard and promote the welfare of Children and Adults at Risk and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance, and complies with best practice, legislation and regulatory requirements, and guidance.

UB22 recognise that the welfare and interests of Children and Adults at Risk are paramount in all circumstances. It aims to ensure that all Children and Adults at Risk:

- have a positive and enjoyable experience of projects and programmes funded by UB22 in a safe environment; and
- are protected from abuse whilst participating in any programmes funded by UB22.

A Child is a person under the age of 18.

An Adult at Risk is a person aged 18 years or over who has needs for care and support and; is experiencing, or at risk of, abuse or neglect, and 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.

Although UB22 personnel do not regularly come into direct, unsupervised contact with project beneficiaries, UB22 will pay for DBS checks for staff and for our Perry Chaperones. The need for any other volunteers, contractors and Trustees to hold DBS certificates will be considered on a case-by-case basis and decisions will be recorded in the safeguarding due diligence log. Our staff list will be reviewed twice a year to assess whether any new checks are required.

Where we fund projects that engage children and/or vulnerable adults it is a priority for us to assure ourselves that our beneficiaries, their friends and families, and all those in project delivery chains feel safe, free from bullying, harassment and discrimination, and able to speak out if they feel something is wrong.

We manage this mainly through our grant agreement letters which stipulate that:

- an adequate Safeguarding and Protection Policy must be in place,
- staff, contractors and volunteers are appropriately vetted and DBS checked where necessary
- a named safeguarding lead for the programme being funded
- evidence that the policy is being implemented.

Should any safeguarding issues come to our attention, we will follow a clear escalation process, first within the organisation and, if necessary, to the relevant local authority.

Amil Khan is the United By 2022 Trustee Board Safeguarding Champion. The Trustee Safeguarding Champion has overall responsibility for ensuring our grantees adhere to the terms of our grant agreement letters, and that they understand our obligation to respond to whistleblowers or other reports that cause us to be concerned about the safety of those involved with UB22 funded projects.

We're also committed to our duty to have due regard to the need to prevent people from being drawn into terrorism (Prevent Duty) and expect all our staff to share this commitment. This policy explains our responsibilities for supporting our Prevent Duty and what we'll do to meet the requirements placed on us under Section 26 of the Counter-Terrorism and Security Act 2015.

1. Internal Policy Guideline

Any safeguarding issues arising in UB22 or with our grant holders will be referred to our Safeguarding Champion, who will ensure that UB22 undertakes its responsibilities robustly and investigates all potential safeguarding breaches thoroughly. The Trustee Board will also assure themselves that UB22 staff are properly trained and equipped to undertake appropriate safeguarding responsibilities.

UB22's Designated Safeguarding Lead (Nicola Turner MBE), on behalf of the Trustee Board, is responsible for all aspects of staff training, health, safety, and wellbeing.

2. External Policy Guideline

UB22 recognises our responsibility, albeit indirect, for the safety and wellbeing of our grant beneficiaries, a good proportion of whom are expected to be either minors or vulnerable adults.

We will manage that responsibility at all stages of the life of a grant as follows:

- At the grant application stage where, as part of our due diligence checks, we ask for evidence that the applicant has a policy for the safeguarding and protection of children and vulnerable adults.
- Should the application progress to the next stage, we will review the safeguarding policy to check the following:
 - Who is responsible for managing the policy?
 - Are there regular risk analyses and policy reviews?
 - Are staff required to have DBS checks?
 - Is there clear guidance on how to report a safeguarding concern?
- At the grant set-up stage, we will include certain conditions in our grant agreement letters. These include, but are not limited to:
 - A requirement that the applicant, any third parties working on the delivery of the grant, will abide by all legislation relating to safeguarding and the protection of children and vulnerable adults - this includes ensuring that all staff and volunteers working with children and vulnerable adults have a current DBS check.
 - A requirement to promptly inform us, in writing or email to the Executive Director, if any of the trustees, staff or volunteers working on the project are under investigation by the police or other authorities. In this instance we would also ask them to stop this member of staff working on a funded project until the investigation has finished, and the member of staff exonerated.
 - A requirement for a named Safeguarding Lead for the project from the applicant's Senior Management Team. This individual must have an enhanced DBS check and be trained to deal with safeguarding issues.
- When the grant is live, we ask all organisations to verify that they have the appropriate procedures in place and provide evidence of this in the funding monitoring reports that they provide to UB22.

3. If a safeguarding risk or issue comes to our attention

We envisage that there are two ways in which a risk or issue affecting project beneficiaries might come to our attention:

- If the individual(s) concerned or a third party report it to us.
- If the grantee lets us know that there is an issue.

Reports from individuals or third parties

If an individual reports an incident, or pattern of behaviour to us, we will initially suggest that they should lodge their report with the grantee organisation. We will assist them by providing the name of a senior member of staff with responsibility for safeguarding issues (see above). We expect that the grantee

organisation will investigate and report on the matter in accordance with their own Safeguarding and Protection Policy.

We will also report the matter to UB22's Safeguarding Champion, who will oversee the investigation from UB22's side to ensure that the matter is dealt with appropriately and a proper resolution is reached. We will keep a safeguarding register of all matters reported to us, which will include details of the actions taken by UB22 to resolve the matter.

We will also maintain a Safeguarding Due Diligence Register, which will evidence steps that UB22 is taking to enhance safeguarding and welfare, prevent harm and enact this policy.

Reports from a grantee

If a grantee organisation notifies us of an issue this is usually because they are confident that they are managing it appropriately. We will ask them for a written account of what has happened, anonymising any identifiable characteristics of the individuals involved, what they are doing about it, the welfare of those affected, and of any likely repercussions, including any reputational damage that might accrue to UB22.

If we are satisfied that the grantee has acted properly, and according to their own policies and the terms of the grant agreement letter, we will then take the following steps internally:

- Assess the magnitude of the risk and enter it with the appropriate rating into the safeguarding register, and also to the Risks and Issues Register if appropriate.
- If the risk is Low, Minor or Moderate (using UB22 risk definition criteria as set out in the Risks and Issues Register) we will leave it until the next Trustee Board meeting to notify Trustee Board. If it is Likely or Critical, we will notify the Chair and the Trustee Board immediately.

If we feel the grantee organisation is in breach of the terms of the grant agreement letter, and/or that they have not followed their own safeguarding policy we may exercise the right to impose sanctions, including partial or complete withdrawal of the UB22 grant. Any such decision must be discussed with and approved by the Trustee Board.

Reports from UB22 staff, contractors and volunteers

If a member of UB22 staff, a contractor or volunteer wishes to raise an issue, they should do so with the Designated Safeguarding Lead or the Trustee Safeguarding Champion. If the issue concerns the Designated Safeguarding Lead or the Trustee Safeguarding Champion, they should contact the Chair of the Board of Trustees.

We will ask them for a written account of what has happened, anonymising any identifiable characteristics of the individuals involved, what they are doing about it, the welfare of those affected, and of any likely repercussions, including any reputational damage that might accrue to UB22.

The matter shall then be investigated in accordance with our internal policies and procedures.

4. Photographing and filming Children or Vulnerable Adults

As part of our work, we will take photographs and videos of our staff, volunteers, contractors, grantees and participants in our programmes – some of whom may be children or vulnerable adults.

Where we are taking photographs or videos of children or vulnerable adults, we shall obtain the consent of a person who hold parental responsibility for them. When gaining such consent, we shall make them aware of what they are consenting to by:

- Make them aware that a photo or video is being taken.
- Explain what the image is going to be used for, and how it could be used in the future.
- Ask for their consent to share the photo or video and record this on a written consent form.
- Tell them how long you will keep the photo or video for, why they are being kept for this length of time and what will happen once this period has expired.
- Explain how a child or parent can withdraw consent if they change their mind, and what you will do in response.
- Make it clear that if a child's photo or video has been used online or in printed publications it will be very difficult to recall it if consent is withdrawn.

In addition:

- We shall keep a record of the consent that has been given for images that we use.
- Ensure that staff and volunteers do not use personal devices to take photographs or videos.
- Ensure that any contractor engaged by UB22 to take photographs or videos are DBS checked.
- Ensure that where consent has not been obtained, the individual is clearly identifiable to staff, volunteers and contractors and that their images are not taken or used.

5. Fulfilling our Prevent Duty

Protecting vulnerable groups from the risk of radicalisation is part of our wider safeguarding duty under this policy and our obligation under our Prevent Duty.

Our obligations

We will:

- o assess the risk of vulnerable groups in our care being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology,
- o take appropriate and proportionate action in response to any concerns, and
- o where appropriate, consider making a referral to the Channel programme.

Our staff will remain alert to any changes in the behaviour of a child or vulnerable adult, which could show that they may be in need of help or protection. Those at risk of radicalisation may display different signs or try to hide their views.

Staff are advised to use their professional judgement to identify those who might be at risk and to act proportionately. Staff are expected to take action and report behaviour of concern to their manager and the CEO straightaway.

6. Sensitive or Serious Matters

We recognise that an individual may feel very vulnerable when blowing the whistle on issues relating to safeguarding and protection. If it becomes clear that they feel fearful or insecure about escalating their complaint within the grantee organisation, we will escalate the matter to the designated safeguarding lead or CEO on their behalf, anonymously if the individual does not want to be identified.

In the case of allegations of serious physical or sexual abuse, or where we feel the allegation is not being treated with enough seriousness by the delivery organisation, we may escalate the issue to the appropriate Local Authority Designated Office (LADO). LADOs hold Safeguarding responsibility for all

children and vulnerable people within the local authority where the activity takes place. Contact details for the LADOs are on the relevant local authority website.

7. Data Protection

UB22 will process the information provided in relation to safeguarding and protection in confidence and in accordance with data protection principles as set out under The General Data Protection Regulation (EU) 2016/679 (GDPR). This data shall be used internally only to ensure that Directors and the Senior Management Team act in the best interests of UB22. The information shall not be used for any other purpose.

8. Approval, Monitoring and Review

UB22's Senior Management Team wrote this policy and submitted it for approval by the Trustee Board in December 2021. It shall be reviewed annually, or if an issue arises that requires UB22 to amend it (for example, changes in legislation). UB22 will make all staff and volunteers aware of this policy and hold refresher training periodically so that all staff and volunteers know what to do if an issue arises.