



## **SSAFA SAFEGUARDING POLICY AND DIRECTION**

### **1. Purpose**

The purpose of this policy and direction is to set out how SSAFA requires every employee, volunteer, and trustee to act to protect children and adults from harm including keeping employees, volunteers and trustees safe within their role and functions on behalf of SSAFA. This policy provides the principles that guide our approach to safeguarding children and adults and should be read in conjunction with **SSAFA Safeguarding Statement**. It is important that you understand how SSAFA intends to keep its beneficiaries safe from harm and how it intends to protect you in your role and the organisations reputation. If you do not fully understand what is being asked of you in terms of safeguarding, you should consult with your line manager at the earliest opportunity.

### **2. Scope (Who is this policy for?)**

This policy applies to all trustees, volunteers, employees, sessional workers, agency staff, students and any other individual working or providing services on behalf of SSAFA. It should be read in conjunction with the following policies:

- a. Employee Recruitment Policy.
- b. Volunteer Policy.
- c. Volunteer Tenure Policy.
- d. Employee Code of Conduct Policy.
- e. Volunteer Code of Conduct Policy.
- f. Managing Allegations against employee.
- g. SSAFA complaints policy.
- h. Whistleblowing.
- i. Local Authority or Command policies and procedures.
- j. Social media (within SSAFA's wider IT policy).

- k. Supervision of employees in the Health and Social Care Operations Directorates.
- l. Health & Safety regulations.

As an employee, volunteer, or trustee it is also expected that you understand and practice the safeguarding code of conduct underpinned by SSAFA's values when providing a service to our beneficiaries. *Please read below:*

### **SSAFA SAFEGUARDING CODE OF CONDUCT**

#### **Commitment:**

We are committed to keeping people safe from harm, especially adults at risks and children. We will ensure that employees, volunteers, and anyone delivering a SSAFA service has the appropriate level of skills and knowledge to undertake their role. We commit to providing a robust process, support, and resources to enable those who come in to contact to be safe from harm and protect children and adults at risk.

#### **Understanding:**

We understand our beneficiaries needs and are non-judgmental in our approach. We will promote an outcomes approach to safeguarding that works for children and adults resulting in the best experience possible. We will together proactively collect safeguarding data to inform our own practice, learning and manage safeguarding risks.

#### **Fairness:**

We are committed to safeguarding children and adults in a way that supports them in making choices and having control in how they choose to live their lives. We will raise public awareness so that employees, volunteers, and communities play their part in preventing, identifying and responding to abuse and neglect.

#### **Courage:**

We will place the needs of adult at risks and children first. If an individual (employee or volunteer) has reasonable cause to suspect an adult or child in their area is suffering or is at risk of abuse and neglect and has needs which leave them unable to protect themselves, then they must ensure enquiries are made in order to decide what action (if any) should be taken, and by whom (the "duty to enquire").

### **3. The legal context (What the law says!)**

This policy has been drawn up based on UK law that seeks to protect children and adults. In this context, the following elements of statute and best practice are pertinent:

- a. The Children Act 1989.
- b. The Children Act 2004
- c. The Sexual Offences Act 2003
- d. Children and Young Persons Act 2008
- e. Working Together to Safeguard Children 2013, 2015, 2018
- f. Mental Capacity Act 2005
- g. The Care Act 2014
- h. JSP 834 2020

For volunteers and staff working overseas in the sovereign base - UK law applies and for those working outside the sovereign base local procedures are followed. Please consult with the local statutory services in that area.

For those working and volunteering in Scotland:

- Scottish Government (2014) National Guidance for child protection in Scotland
- Protection of Vulnerable Groups (Scotland) Act 2007
- Adult Support and Protection (Scotland) Act 2007

For those working and volunteering in Northern Ireland:

- The Children (Northern Ireland) Order 1995
- Safeguarding Board Act (Northern Ireland) 2011
- Children's Services Co-operation Act 2015
- The Safeguarding Vulnerable Groups Act 2006.

For those working and volunteering in Wales:

Follow <https://www.safeguarding.wales>

## **Safeguarding Children**

The Children Act is the foundation on which the protection of children is based. Of paramount importance throughout is the 'welfare of the child'. This means that the need to protect children comes before everything else and this principle needs to be at the forefront of all our work. This may at times cause problems and raise questions for employees and volunteers. However, the principle remains that the protection of children from abuse overrides all other considerations (including confidentiality).

## **Safeguarding Adults**

The Mental Capacity Act and Care Act provides a clear legal framework for how organisations work in partnership with other public services to protect adults at risk, placing Adult Safeguarding on the same statutory footing as children.

Safeguarding adults means protecting a person's right to live in safety, free from abuse and neglect. As an organisation we must demonstrate the aims of adult Safeguarding:

- a. To prevent harm and reduce the risk of abuse or neglect to adults with care and support needs.
- b. To safeguard individuals in a way that supports them in making choices and having control in how they choose to live their lives.
- c. To promote an outcomes approach in Safeguarding that works for people resulting in the best experience possible.
- d. To raise public awareness so that employees, volunteers and communities as a whole play their part in preventing, identifying and responding to abuse and neglect.

If an employee or volunteer has reasonable cause to suspect an adult or child in their area is suffering or is at risk of abuse and neglect and has needs which leave them unable to protect themselves, then SSAFA must ensure enquiries are made in order to decide what action (if any) should be taken, and by whom (the "duty to enquire").

## **4. Types of abuse / specific Safeguarding issues for children and young people**

- a. Physical
- b. Emotional

**Worried about a child or adult at risk?**

Contact the Principal Safeguarding Officer on 0800 032 5612 Option 4 /see pages 12-15 of this policy and direction.

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c. Sexual

d. Neglect

There are other types of abuse listed below:

e. Bullying and Cyberbullying

f. Child Sexual Exploitation

g. Criminal Exploitation and gangs

h. Domestic abuse

i. Female Genital Mutilation FGM

j. Grooming

k. Harmful sexual behaviour

l. Non recent abuse

m. Radicalisation Prevent Duty 2011

Further information can be found at [nspcc.org.uk](https://www.nspcc.org.uk).

**Types of Abuse in Adults**

In adult abuse, signs of abuse can often be difficult to detect. Below is a list of possible types of adult abuse:

a. Physical abuse

b. Domestic violence or abuse

c. Sexual abuse

d. Psychological or emotional abuse

e. Financial or material abuse

f. Modern slavery

g. Discriminatory abuse

- h. Organisational or institutional abuse
- i. Neglect or acts of omission.
- j. Self-neglect

Further information at [scie.org.uk](https://www.scie.org.uk):

## **5. Responsibilities across SSAFA**

All employees and volunteers who have any contact with children and adults at risk have a responsibility to protect them and to provide a safe environment. However, there are key people within SSAFA, Local Authorities and Commands who have specific responsibilities under safeguarding procedures.

### **In SSAFA responsibilities are outlined as follows: (who does what!)**

- a. **Trustees:** With guidance from SSAFA's Safeguarding Trustee, they set the strategic direction for safeguarding and ensure that appropriate resources are in place to implement our approach across both the employee and volunteer network. They are to monitor compliance with this policy and the outcomes of complaint/incident investigations.
- b. **SSAFA Safeguarding Board:** The Safeguarding Board (see ToR Appendix 1), chaired by the Safeguarding Trustee, is the body that will set, review and evaluate the effectiveness of Safeguarding for the whole organisation.
- c. **The Controller**, delivered through the designated Director, as Safeguarding Lead: leadership, accountability, policy and direction, governance and the sharing of information across the organisation to coordinate an appropriate response to any given situation.
- d. **The Designated Director for Safeguarding** is the **Director of Social Care Operations:** Is responsible for ensuring that safeguarding across the organisation is in line with SSAFA's established policy and procedures and leads the development and delivery of safeguarding for volunteers and staff and is the key point of contact with the MoD safeguarding partnership board.
- e. **The Principle Safeguarding Officer (PSO)** – Works in conjunction with the Designated Director for Safeguarding and safeguarding board responsible to deliver the organisations safeguarding strategic aims and objectives. The PSO has

organisational responsibility for monitoring safeguarding issues, ensuring compliance with this policy and acts as the main point of contact for volunteers/employees who want to discuss safeguarding. The Principle Safeguarding Officer provides advice and support and direction around safeguarding issues within office hours.

- f. **Directors of: Volunteer Operations, Director of Social Care Operations and Health** are responsible for leadership, policy compliance, implementation and accountability across their operational areas.
- g. **Directors of: People and Organisational Development and Volunteer Operations** are responsible for training, safe recruitment and accreditation (including DBS and PVG checking, appropriate background and police checks and the checking and confirmation of relevant professional registrations) of employees and volunteers and the development of appropriate people policies.
- h. **Director of Finance:** Monitoring and providing information in respect of the resourcing and budgeting for the safeguarding activities.
- i. **Director of Fundraising:** where relevant, policy compliance, implementation and accountability across their operational area.
- j. **Director of Marketing & Communications:** where relevant, policy compliance, implementation and accountability across their operational area of responsibility.

**6. How does SSAFA meet its obligations to keep beneficiaries safe from harm and its employees, volunteers and trustees safe, skilled and fit for purpose?**

**a. Through Induction, training and vetting.**

The Designated Director for Safeguarding, The Principle Safeguarding officer and trustee lead are to undertake safeguarding training related to their role and responsibilities at least every three years. All other volunteers and employees who have any contact with children or adults at risk are to undertake safeguarding at a level commensurate with their role which is regularly updated and in line with SSAFA's mandatory training requirements. All those requiring an enhanced DBS or a PVG check must undertake Safeguarding Level 1 with regular updates. Should staff go on to undertake higher levels of Safeguarding training, update training is only required at their highest level, for example there is no requirement to update levels 1 or 2 if trained to level 3. Details of the training and learning outcomes required can be found at Appendix 2: 'What Safeguarding Training do I need?'

Health professionals have a duty to protect children and young people from harm, to improve their wellbeing and have the competence to recognise maltreatment and to take effective action as appropriate they have, in addition, a similar remit for adults identified as at risk. The documents that provide the framework which identifies the competencies and minimum training requirements for specific roles within health are:

- Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff Jan 2019
- Adult Safeguarding: Roles and Competencies for Health Care Staff Aug 2018

In addition, all volunteers and employees are to receive safeguarding training updates as required, but at least every three years, to provide them with relevant skills and knowledge to safeguard children and adults effectively. Records of all safeguarding training will be kept for all trustees, volunteers and employees.

SSAFA is to ensure that the Designated Director, Principle Safeguarding Officer and all staff in a designated safeguarding role the Safeguarding Trustee also undertake training in inter-agency working and competency based safeguarding training as appropriate.

In summary:

- i. Every volunteer/employee/recruit who comes into contact with children or adults at risk must attend the appropriate level of safeguarding training for their post during induction **or at the earliest opportunity until this time prior learning will be considered and the risk will be assessed** and then subsequently refreshed in accordance with mandated timelines<sup>1</sup>. As a minimum this is at Level 1. (available on SSAFA Moodle)
- ii. All professional medical and social work employees must be in date to the level of safeguarding training deemed commensurate with their professional role and as detailed in their current job description and in the document "What Training Do I Need?". The Intercollegiate documents relating to roles and competencies for healthcare staff in safeguarding both children and adults. Staff should consider alternative training and learning opportunities appropriate to their working environment which would be an acceptable method of updating, as opposed to re-

attending routine safeguarding training provided, unless they are aware of specific changes to legislation or training materials. *(Please note at the time of reviewing this policy What training do I need for volunteer roles are being reviewed, a separate document will be linked to this policy and direction when completed)*

- iii. All line managers with employees and volunteers working with children and adults must have undertaken Level 2 Safeguarding Training. For further clarification discuss with your line manager in the first instance.
- iv. As all Directors and Trustees share a collective responsibility for Safeguarding, they must have undertaken safeguarding training specific to their responsibility.

#### **b. Through recruitment and Relevant Checks**

- i. All employees and volunteers who come into contact with children and adults at risk of abuse will have the required level of DBS check (PVG in Scotland and NI access, local equivalents when working overseas) for their job / role and this will be renewed in line with organisational requirements. For health staff who have been out of UK for more than five years, or who are overseas residents, a local police check will be required.
- ii. Accountable directors will review (and every six months report to The Safeguarding Board) compliance with policy (DBS/PVG percentages, numbers in date for training etc.) and numbers/nature of safeguarding complaints and incidents, allegations against employees or volunteers. Independent audit will periodically check and confirm this data.
- iii. Where SSAFA refers to a third-party providers/organisation for health and social care needs, SSAFA will first ensure that the third-party organisation has appropriate safeguarding policies and procedures in place. Should no such policies and procedures be in place, then a process of due diligence will be undertaken to ensure that the organisation is not used until appropriate safeguarding policies and procedures are in place. Where there is any doubt, this should be initially discussed with SSAFA's Principle Safeguarding Officer.

### **c. Through risk management**

- i. The management of those employees/volunteers where the role has been assessed as requiring a check an out of date for DBS / PVG/Access checks or safeguarding training: The default policy for SSAFA is that all employees or volunteers who may met children or adults at risk of abuse are to be in date for both DBS / PVG checks and safeguarding training (at the appropriate level).
- ii. Where, through no fault of their own, an employee DBS /PVG/Access check has lapsed or they have not been able to access appropriate training in line with our policy, that individual's line manager may elect to continue to employ the individual in their current role pending checks or training. This decision will be based on the line manager's personal knowledge of the individual, and the line manager will then accept the liability for the individual's safeguarding clearance. However, each instance must always be discussed with SSAFA's Safeguarding Lead prior to any definitive decision being taken. This does not apply to volunteers, if a check is required for the role then the check needs to be completed prior to starting the role in SSAFA.
- iii. The management of those employees/volunteers who fail to engage with DBS / PVG/Access checking or safeguarding training: Where an individual fails to engage with the DBS / PVG/Access checking process (for example by failing to produce necessary documentation), the individual's line manager must suspend that individual from direct contact with beneficiaries until the DBS / PVG/Access process has been completed. If the individual continues to fail to engage, then, for employees, disciplinary action should be considered. Volunteers should remain suspended from client contact and the Volunteer Tenure Policy consulted.
- iv. The management of those employees/volunteers whose DBS / PVG check raises concerns: This is an organisational decision and will be based on the nature of the concern raised by the DBS / PVG/ Access check. This will be decided in line with safer recruitment procedures for employees and volunteers.
- v. The management of those employees/volunteers who have a complaint/incident pending which is pertinent to safeguarding, the Principal Safeguarding Officer should be contacted for specialist advice/discussion regarding any safeguarding element and mitigation of risk.

- vi. If there are concerns about a safeguarding incident resulting from a DBS/PVG/Access/Police check, this should be reported to the Principal Safeguarding Officer and if deemed a potential reputational issue the Principal Safeguarding officer will notify the PR Team on 020 7463 9321.

**d. Through the investigation and reporting of complaints and incidents.**

- i. When a complaint is submitted by or a statutory body that expresses or suggests any concern relating to how a case has been managed from a safeguarding perspective, then this is to be immediately escalated, via relevant line management, to the Designated Director for Safeguarding. Any such complaint is to be dealt with, and in accordance with the timelines stipulated, in H&SC Complaints Policy.
- ii. When a complaint is submitted by beneficiaries that expresses or suggests any safeguarding concerns the Principal Safeguarding officer must be notified.
- iii. Similarly, if there is any evidence or concern that relevant safeguarding policies and procedures have not been followed, at whatever level of the organisation, then this must be raised by employees/volunteers as an incident and submitted, via relevant line management, to the Designated Director for Safeguarding in SSAFA.
- iv. Such complaints and incidents will then be reviewed and investigated, as appropriate. SSAFA's Designated Director for Safeguarding will be notified and kept apprised of progress. They will in turn update the Controller and other relevant directors<sup>2</sup>.
- v. The findings of any such investigations will be reported to the Controller, The Safeguarding Board and Risk Committee via the chair who will report and update Council and, where necessary, partner organisations. Learning points from any such investigation will be cascaded across the organisation, and the original complainant or employee/volunteer who raised the incident will be kept fully informed of the findings and recommendations.
- vi. The Safeguarding Board has the authority to request any safeguarding complaints or incident investigations to be audited by Subject Matter Experts (SMEs) external to SSAFA or an Internal Review.

vii. Safeguarding complaints can be a reputational risk, at the discretion of the Principal Safeguarding Officer/Designated Safeguarding Lead the PR Team may be alerted at the beginning of the process.

**e. Through the appropriate escalation of safeguarding concerns about clients, patients, service users or third parties**

Anyone who delivers any outputs or services for SSAFA needs to have a full understanding of how to escalate any concerns they may have regarding the Safeguarding of children or vulnerable adults. SSAFA Adoption Service and the RAF PS SWS have their own specific safeguarding procedures available to staff.

Procedures for volunteers are laid out in Appendix 3.

Procedures for Community Healthcare Operations Overseas are laid out in Appendix 4.

Procedures for Employees working outside of Health and Social Care Operations – A checklist & procedure document is being developed and will be made available once complete.

**f. Through the appropriate escalation of safeguarding concerns relating to the behaviours and actions of SSAFA employees/volunteers**

- i. Within the volunteer network or in UK based services - initially to local line management prior to appropriate escalation and advice from SSAFA Safeguarding SMEs.
- ii. Within Health initially to local line management prior to appropriate escalation and advice from the named nurse for safeguarding and/or local safeguarding coordinator.
- iii. All employees and volunteers are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of employee induction/volunteer training.
- iv. There are processes in place for reporting any concerns about an employee or volunteer. Any concerns about the conduct of an employee or volunteer will be referred to the local Professional Safeguarding Lead who will manage the issue in line

with has enough status and authority in SSAFA to manage employment/volunteer procedures. Such cases will then be managed in conjunction with the People Team (for employees) or Volunteer Operations (for volunteers) and the branch chairman or region representative where appropriate for volunteers. An investigation Officer will be allocated when there is an allegation against a staff or volunteer member and the People Team policy will be utilized. Employee and volunteer matters are confidential and SSAFA operates within statutory guidance around data protection.

**g. Through the implementation of 'Safer Recruitment'**

SSAFA has employees who work directly with children and adults at risk of abuse. As such, SSAFA undertakes its recruitment procedures and practices in accordance with current employment legislation and guidance. This is the responsibility of the People Team. Compliance regarding Safer Recruitment guidance will be undertaken by the Director of People and Organisational Development.

Some SSAFA volunteers work directly with children and adults at risk of abuse. As such, SSAFA undertakes its volunteer recruitment procedures and practices in accordance with current legislation and guidance. This is the responsibility of Volunteer Operations. Compliance regarding Safer Recruitment guidance for volunteers will be undertaken by the Director of Volunteer Operations.

- i. All managers are required to follow SSAFA policy for requesting enhanced Disclosure and Barring Service (DBS) or Disclose Scotland PVG or NI access checks for relevant employees and volunteers.
- ii. The requirement for an enhanced DBS PVG Access checks will be considered when any job description is reviewed or produced. The Director of People and Organisational Development will approve the decision as to whether an enhanced DBS, PVG, Access is required or not for each new appointment.
- iii. The requirement for an enhanced DBS, PVG, Access check will be considered when any volunteer role description is reviewed or produced. The Director of Volunteer Operations will approve the decision as to whether an enhanced DBS or a PVG Access is required or not for each new volunteer role.
- iv. SSAFA's Vetting Panel will be convened to review identified convictions.

v. SSAFA will engage with the Fit and Proper Test for the employment of Directors. The fit and proper person regulation (FPPR) although this applies to NHS organisations the principles will be applied that SSAFA will have appropriate and effective processes in place to assess the appropriateness of an appointment.

**h. Through information sharing and the maintenance of clear, confidential, and contemporaneous records within SSAFA or MOD databases. [See Appendix 5](#)**

**i. Through supervision**

All employees and volunteers who are either required to undertake supervision under the terms of their job descriptions or it is felt necessary due to the nature of their role are to ensure that safeguarding issues are discussed and, where necessary, appropriate actions taken, as part of their supervision process. For all health practitioners there is a mandatory requirement to access safeguarding supervision, as a minimum, every three months.

**j. Through access to advice and support to employees and volunteers**

All employees and volunteers are to know, through training and development of local policies, who their local point of contact is for safeguarding advice should there be a safeguarding concern they feel unable to personally manage.

**k. Through whistleblowing**

Whistleblowing is 'making a disclosure in the public interest' and occurs when an employee or volunteer raises a concern about dangerous or illegal actions of other employees or volunteers that in turn affects patients/clients/beneficiaries or members of the public.

Employees and volunteers are made aware of the duty to raise concerns about the attitude or actions of employees or volunteers in line with SSAFA's Whistleblowing policy.

SSAFA wants everyone to feel able to report any safeguarding concerns. However, for employees or volunteers in UK who feel unable to raise these concerns internally, and if the concerns relate to a child, they can call the NSPCC whistleblowing helpline on 0800 028 0285 (line is available from 8am to 8pm, Monday to Friday) or [email: help@nspcc.org.uk](mailto:help@nspcc.org.uk).

For adult concerns employees/volunteers should contact their Local Authority.

For overseas H&SC/volunteers they should contact the local duty social worker.

### **I. Through assurance**

The following is how SSAFA will assure that it is meeting its safeguarding obligations:

- i. Mandatory safeguarding training including levels, frequency, and subject matter (adults /children) and as agreed by Learning and Development (L&D), service safeguarding leads and signed off by SSAFA's Safeguarding Lead. An annual report to the Safeguarding Board demonstrating compliance will be completed by L&D.
- ii. Levels and frequency of DBS, PVG or Access checks for employees will be agreed by the People Team and Vol Ops service managers and signed off by SSAFA's Safeguarding Lead for each new role description. Annual report demonstrating compliance to Safeguarding Board to be completed by the People Team and Vol Ops.
- iii. Levels and frequency of DBS, PVG or Access checks for volunteers will be agreed by service managers and the Director of Volunteer Operations and signed off by SSAFA's Safeguarding Lead for each new volunteer role. Annual report demonstrating compliance to Safeguarding Board to be completed by the Director of Volunteer Operations.
- iv. Annual reporting to SSAFA's Safeguarding Board of allegations against employees or volunteers by SSAFA's Safeguarding Lead.

### **Non-compliance**

Failure to follow this policy is a serious matter and may be dealt with under the complaints procedure for volunteers and trustees and disciplinary procedures for employees.

**Worried about a child or adult at risk?**

Contact the Principal Safeguarding Officer on 0800 032 5612 Option 4 /see pages 12-15 of this policy and direction.

**Other information**

Issue date	March 2021
Version number	1.1
Status (draft or approved)	Approved
Next review date	12 months from issue date
Equality impact assessment date	
Policy owner	Director Social Care Operations
Trustee responsible for safeguarding	Dr. Diana Wood