

## Safeguarding Policy

### Policy Statement

Our vision is to see lives and communities in the Middle East transformed by the compassion of Christ, by partnering with Middle East Christians as they bring healing and hope to all who face poverty and injustice. In order to achieve this vision, we are committed to not only ensuring that our activities both in the UK and through our partners overseas do no harm, but that they actively promote the rights of children and adults at risk of harm.

As such all staff, trustees and other representatives of Embrace must:

- Uphold and protect the rights of all people equally as set out by the UN Convention of the Rights of the Child (UNCRC) and the Universal Declaration of Human Rights (UDHR)
- Report any evidence of wrongdoing
- Have a zero-tolerance approach to bullying, harassment and abuse

We promote a culture of care and transparency in all areas of our work, recognising that only by actively pursuing the best for every individual will we achieve the safety and protection of children and other vulnerable people.

### Scope

This policy states mandatory responsibilities and procedures for all Embrace staff, trustees, volunteers and supporters on issues to do with the well-being and safeguarding of all with whom we come into contact, and especially any children and adults at risk of harm.

### Introduction

Embrace is committed (a) to ensuring that all possible steps are taken to prevent abuse, exploitation or harm occurring to any child or adult at risk with whom we have a connection and (b) to acting promptly and appropriately when a concern is raised or identified.

In order to ensure that we meet best practice standards, including in the development of this policy and associated codes of conduct and reporting procedures, Embrace the Middle East is an associate member of Keeping Children Safe, who review our policies and procedures as they develop. We also benefit from the advice and support of thirtyone:eight.

This policy covers the measures required to prevent harm to children and adults at risk and the steps which we will take should harm be suspected, witnessed or reported. Notwithstanding that our ability to control the activities of overseas partners is limited, we are committed to working with partners to improve and maintain safeguarding procedures and to protect and promote the well-being of their beneficiaries at all times.

### Definitions

The World Health Organisation (WHO) provides the following definition of abuse, which while referring specifically to children can equally be applied to adults at risk:

'Child maltreatment, sometimes referred to as child abuse and neglect, includes all forms of physical and emotional ill-treatment, sexual abuse, neglect, and exploitation that results in actual or potential harm to the child's health, development or dignity. Within this broad definition, five subtypes can be distinguished – physical abuse; sexual abuse; neglect and negligent treatment; emotional abuse; and exploitation.'<sup>1</sup>

A more detailed explanation of the five subtypes can be found in **Appendix 1**.

For the purposes of this policy:

- 'Child' refers to those under the age of 18 years, in accordance with the United Nations Convention on the Rights of the Child.
- 'Adult at risk' refers to a person aged 18 years or over who may be in need of community care services by reason of mental or other disability, age or illness and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. This definition is taken from The Care Act 2014.
- 'Safeguarding' means the policies and procedures we put in place as an organisation to protect children and vulnerable adults from harm within our organisational activities and reach.

The policy is split into three main sections:

- Awareness
- Prevention
- Reporting & Response

### **Awareness**

#### ***Training and development***

The Leadership is committed to ensuring adequate safeguarding training for all workers, developing a culture of awareness of safeguarding issues, standards and expectations. All our workers receive induction training, and a review of safeguarding training needs will be conducted on an annual basis and appropriate additional and/or refresher training delivered as necessary. The Leadership will also regularly review its procedures to ensure the charity meets its obligations as outlined in this policy.

This includes ensuring that:

- (1) Training resources and safeguarding information are easily accessible to staff at all times.
- (2) Updates about safeguarding are presented regularly in staff meetings.
- (3) Staff members who have access to personal information about children and adults at risk at the projects with which we work will be trained in, and become fully conversant with, data protection guidelines and practices regarding

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<sup>1</sup> [http://www.who.int/topics/child\\_abuse/en/](http://www.who.int/topics/child_abuse/en/)

the confidentiality of such information.

- (4) All staff are responsible for their adherence to these safeguarding and data protection guidelines and practices as well as the employee Code of Conduct. Where the Code of Conduct is breached, the matter will be investigated in line with the charity's disciplinary policy and depending on the outcome, may lead to disciplinary action.
- (5) Embrace's Designated Safeguarding Lead, who is also chair of the Safeguarding Committee, provides overall leadership within the charity for best practice, and is responsible, with the support of the CEO and Leadership Group, for monitoring compliance.
- (6) The Safeguarding Committee is supported in their work and in any action they may need to take in order to protect children and adults with care and support needs.
- (7) The CEO is responsible to the trustees for ensuring that all Embrace policies and practices support and facilitate the charity's safeguarding priorities and practice as set out in this policy.

## **Prevention**

### ***Management roles and responsibilities***

The CEO is an associate member of the Safeguarding Committee but sits outside of its structure for reasons of accountability and impartiality, and to enable investigation of safeguarding complaints/incidents to run in parallel with disciplinary procedures when necessary. The CEO acts as the main conduit between the Board of Trustees and the Safeguarding Committee, ensuring that safeguarding is a key priority for governance.

The chair of the charity's Safeguarding Committee is the Designated Safeguarding Lead. The deputy chair is their second. The chair, supported by and reporting to, the CEO, is responsible for overseeing the implementation of this safeguarding policy.

All Embrace staff, trustees and volunteers will be made aware that they can talk to the Designated Safeguarding Lead, or any member of the Safeguarding Committee, about safeguarding issues (or to the CEO if concerns relate to the Designated Safeguarding Lead).

The trustees of Embrace are responsible for assuring themselves that issues related to the protection of children and adults at risk are adequately managed and that appropriate safeguards and procedures are in place. The Board has a Lead Safeguarding Trustee who acts on behalf of the Board. They are responsible for ensuring best practice in terms of liaison between management and trustees on all safeguarding matters.

Embrace's HR Manager is an associate member of the Safeguarding Committee to advise on issues pertaining to human resources and staff recruitment. For internal safeguarding issues, they sit outside of the committee's core membership for reasons of impartiality and accountability, and to allow staff disciplinary procedures to run in parallel with the investigation of safeguarding complaints/incidents when necessary. The HR Manager is responsible for Embrace's safer recruitment processes, and other policies

relating to safeguarding such as Whistleblowing, Bullying and Harassment, Complaints and Disciplinary procedures as well as overseeing the organisation's approach to the health and wellbeing of its staff.

The Safeguarding Committee maintains an up-to-date risk register. This is based on a risk assessment carried out by each member of the Safeguarding committee in consultation with their colleagues to ensure risks relevant to their team's activities are considered. This risk register is shared with and accessible to senior management and trustees.

### ***Safer recruitment processes***

The Leadership will ensure all workers (paid and unpaid) are appointed, trained, supported and supervised in accordance with government guidance on safe recruitment.

This includes ensuring that:

- There is a written job / role description for the post.
- Those applying have completed an application form and self-declaration (where post qualifies for an enhanced DBS) form or declaration of suitability (to be used where post requires Basic Disclosure Check) where appropriate.
- Those shortlisted have been interviewed and safeguarding has been discussed as part of the interview process.
- Self-declaration forms, for all posts that qualify for a DBS check, are required from all new employees and trustees prior to recruitment, and are renewed every three years.
- Written references have been obtained, and followed up where appropriate.
- A disclosure and barring check has been completed where necessary (we will comply with Code of Practice requirements concerning the fair treatment of applicants and the handling of information).
- All DBS checks are renewed in line with current guidance or a minimum of every three years, whichever is the lesser.
- Qualifications where relevant have been verified.
- Suitable safeguarding induction training is provided for the successful applicant.
- The employee has completed a probationary period.
- The successful applicant has been given a copy of the organisation's safeguarding policy and code of conduct and knows how to report concerns.
- on appointment and re-appointment all trustees will be required to undergo a standard level DBS check, or a basic disclosure if this is not possible.
- All staff, trustees and volunteers and consultants confirm that they have read and understand their safeguarding responsibilities and commit to upholding the dignity and safety of all people with whom they come into contact at all times in accordance with our Code of Conduct and Ethics.

\*The appropriate level at which UK citizens can be checked is defined by law. Embrace will always apply for the highest level of legally obtainable check as advised by its disclosure check providers.

### ***Overseas travel***

All visitors to Embrace partners overseas are required to undergo a visit orientation prior to travel. This includes a dedicated section on Embrace's approach to safeguarding. Visitors must be familiar with our safeguarding and associated policies. Additionally and prior to travel, any visitors to Embrace projects who are not staff or trustees and therefore have not already signed a Code of Conduct, must do so. This includes a commitment to protect the dignity and safety of all peoples at all times and especially children (under the age of 18) and adults at risk. A range of prohibited behaviours are spelt out in the Code of Conduct.

In addition to these requirements, overseas volunteers undertaking roles at facilities that support children and adults at risk will be checked at the highest level legally obtainable, as advised by the charity's safeguarding advisors.

### ***Correspondence and record keeping***

Embrace takes its responsibility towards safeguarding its supporters seriously. We recognise that at any time a supporter may become vulnerable. Our Vulnerable Supporter Policy is available on our website. The Embrace Supporter Experience team exists in part to help supporters and their families navigate these times, and in keeping with GDPR regulations, we are committed to ensuring that the work of Embrace does not negatively impact on any individual's life.

### ***Data Handling***

We have GDPR compliant Data Protection policy and Data Retention policies. These policies are intended to ensure the safe and secure recording and storage of all personal data including special categories of personal data as overseen by the Head of IT and Security.

### ***Marketing activities (including trading)***

Embrace's use of photographs in any format is subject to prior permission having been granted by the beneficiary or a responsible adult, in line with our Image Capture and Use Policy. This also sets out how we store and use images in a GDPR compliant way and consistent with our safeguarding commitments. Unless specifically agreed, names of individuals will be changed to preserve anonymity. All communications will comply with our Communications about Children & Adults at risk guidelines (see **Appendix 2**). The Head of Communications is responsible for ensuring that these policies are maintained, updated and adhered to at all times.

We will ensure as far as possible that no goods sold in our catalogue are manufactured using child and/or forced labour or in conditions which do not meet minimum welfare requirements. It is the responsibility of the Head of Trading to execute all due diligence to ensure that the goods that we sell meet these standards.

### ***Partner policies and procedures***

Ensuring that the work of our partners does no harm to children and the vulnerable in their communities but promotes their rights under the UNCRC and UDHR is an integral aspect of Embrace's mission to bring healing in the face of poverty and injustice in the Middle East. Embrace is an associate member of Keeping Children Safe and upholds their International

Child Safeguarding Standards. We support partners (including financially) to access the training and support they need through a network of professionals including VIVA.

We recognise that in each of the countries in which we work, the laws relating to the welfare of children and adults at risk differ, as does the definition of vulnerability and the application of protective laws. Embrace funding is conditional on partners having a written safeguarding policy which meets local regulations and international standards. This must include clear process for the actions that will be taken if abuse is discovered. We will hold on file English language copies of partner safeguarding policies. We will also supply all partners with a Serious Incident and Safeguarding Reporting Form, which should be used to report safeguarding incidents to Embrace within 24 hours. These reports are reviewed by the Safeguarding Committee who can support the P&P Manager to make recommendations to the partner if there are concerns related to how an incident was handled.

Where a partner's operations permit any kind of beneficiary access to the internet or e-mail, the partner must also have a responsible use policy to include measures to prevent children and adults at risk from exposure to inappropriate images or potentially harmful communication with other internet users.

Partners must demonstrate a commitment to the ongoing training, care and development of their staff in relation to safeguarding. Embrace, in conjunction with an internationally recognised safeguarding support adviser, will provide training and mentoring for partners in the area of safeguarding as required.

## **Reporting & Response**

All staff and representatives of Embrace are made aware of their responsibility to uphold this policy.

All staff and trustees are required to understand and commit to uphold in their behaviours the charity's Code of Conduct and Ethics, including to protect and uphold the dignity and safety of all people with whom they come into contact, at all times.

Embrace's safeguarding committee (see **Appendix 3**) will meet quarterly to monitor compliance with and advise on improvements to the charity's Safeguarding Policy. The committee will also meet as required (where possible within 24 hours) to consider any allegations of abuse, disclosures or serious incident reports. Each team within the charity will have at least one representative (safeguarding focal point) serving as a member of the Committee. The Chair of the committee will be the charity's Designated Safeguarding Lead and a deputy is also appointed from within the committee.

If any member of staff or volunteer suspects abuse, if a child, young person or adult at risk makes a disclosure, or if a person external to Embrace reports a suspicion or allegation relating to Embrace's staff, volunteers or activities - including activities carried out in partnership with Embrace by other organisations - the following steps must be taken. See **Appendix 4** for the full safeguarding reporting flowchart.

- Avoid any delay.
- Call the emergency services if someone is in immediate danger.
- Record what you have seen or heard using the Embrace incident, disclosure or information gathering form.
- Pass the report to a Safeguarding Focal Point within 24 hours.

- The Safeguarding Focal Point will pass the report to the Designated Safeguarding Lead. If the safeguarding officer is implicated the CEO or Chair of trustees for the Charity should be informed).

The designated safeguarding officer will see that the Safeguarding Committee meets as soon as possible (ideally within 24 hours) to consider the report. However, if urgent action is required to protect children this must be done immediately. No staff member, trustee or volunteer will prejudice their own standing or position within Embrace by responsibly reporting potential, or suspected, abuse of a child or adult at risk.

Embrace will take prompt and appropriate action in response to all allegations or suspicions of abuse that come to its attention, in accordance with the procedures set out below:

1. Reported allegations or incidents will be brought to the attention of the Designated Safeguarding Lead and members of the Safeguarding Committee (safeguarding focal points). If the Designated Safeguarding Lead is implicated then the CEO, or Chair of Trustees of the Charity, should receive the report. If the CEO is implicated the Chair of the Safeguarding Committee will report directly to the Chair or Deputy Chair of Trustees. If the reported abuse has occurred between members of staff then the Internal Safeguarding Group will be convened to ensure the protection of all staff, and to facilitate action in line with the Grievance and Disciplinary Policy. This group will comprise the HR Manager, CEO, Designated Safeguarding Lead and the Lead Safeguarding Trustee.
2. The Designated Safeguarding Lead will ensure that a record (Embrace Incident or Disclosure Form) of the nature and grounds of the allegation signed and dated by the person who is making the report has been completed. This document will form the basis of any consideration of follow-up action to be taken by the Safeguarding Committee and/or Internal Safeguarding Group. Any actions or decisions taken as a result of the allegation and the Committee's deliberations will be recorded and kept in a secure place.
3. The Designated Safeguarding Lead will inform the police or social services of an abuse allegation or disclosure, where the allegation is found, upon preliminary enquiry by the Committee, to have possible substance.
4. Subsequent to this, Embrace's Designated Safeguarding Lead or the CEO will also inform the Chair of Trustees.
5. In the event of an employee, trustee or volunteer being implicated in the allegation, the CEO or Chair of Trustees will take any interim disciplinary action necessary, pending the outcome of any police investigation.

***Where there is suspicion of abuse at an Embrace-supported project, the following additional procedure will also be followed***

1. Embrace's Designated Safeguarding Lead will consult with the Director of Programmes and Partnerships or the CEO.
2. The matter will then be raised with the principal or director of the project concerned, and if appropriate, with the local Board of Trustees, for further investigation and action, as necessary, at the local level.
3. The principal or director of the project, or a representative of the local Board of Trustees, would then be expected to inform Embrace of the outcome of the investigation within an agreed timeframe.

**Supporting Policies**

Other policies support and inform our safeguarding responses. These include but are not limited to:

- Code of Conduct and Ethics
- Vulnerable Supporter Policy
- Acceptable Use Policy
- Data Protection Policy
- Public Interest Disclosure (Whistleblowing) Policy
- Disciplinary and Grievance Policy
- Bullying and Harassment Policy

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## Definitions

The WHO (World Health Organisation) distinguishes the abuse or maltreatment of a child under five into sub-categories. We will use these definitions which were agreed by the WHO in 1999:

- **Neglect.** The inattention or omission on the part of the caregiver to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter and safe living conditions, in the context of resources reasonably available to the family or caretakers and causes, or has a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.
- **Physical.** Physical abuse of a child is that which results in actual or potential physical harm from an interaction or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power, or trust. There may be single or repeated incidents.
- **Emotional.** Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential, and in the context of the society in which the child dwells. There may also be acts toward the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, patterns of belittling, denigrating, scape-goating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.
- **Sexual.** Child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to the inducement or coercion of a child to engage in any unlawful sexual activity; the exploitative use of a child in prostitution or other unlawful sexual practices; the exploitative use of children in pornographic performances and materials.
- **Commercial or other exploitation of a child.** Refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour and child prostitution. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development.

### Guidelines on Communications about Children & Adults at Risk

The following standards apply to all Embrace communications:

- Where it is necessary to use case studies to highlight the work of Embrace, names of children and adults at risk will be changed on collection of case studies.
- Within its fundraising and publicity materials, Embrace needs to use text and imagery from its partners. Embrace recognises that in doing so it has a responsibility to respect the rights of individuals at all times. Every individual has the right to be accurately represented through both words and imagery. Portrayal of individuals must not be manipulated or sensationalised in any way, but provide a balanced depiction of their life and circumstances. They must be presented as people with their own identity and dignity preserved. This applies equally to written, photographic and filmed materials.
- People must, wherever possible, give their own accounts, rather than have others speak on their behalf. People's ability to take responsibility and action for themselves should be highlighted.
- Embrace will avoid the following:
  - Language and images that could possibly degrade or victimise or shame children and adults at risk.
  - Making generalisations which do not accurately reflect the nature of the situation.
  - Discrimination of any kind.
  - Using pictures out of context (these should be accompanied by an explanatory caption and be relevant to any accompanying text).
- Preserving the dignity of all individuals who appear in images is the utmost priority. Individuals must not be depicted in any way that might violate their dignity, this includes but is not limited to images of individuals in a state of undress, or any poses that could be interpreted as sexually provocative.
- Partner and beneficiary delegated authority must be given before taking photographs, except under exceptional circumstances where this may not be possible or desirable.
- Embrace will acquire informed consent from the individual, the individual's guardian and/or the NGO responsible for the individual before using any image, experience or story for publicity, fundraising, awareness raising or other purpose. The purpose must be made clear to the consent giver.

Individuals or organisations that request the use of Embrace resources, such as photographs, will be required to sign an agreement with the organisation as to the proper use of such materials.

# Terms of Reference for Safeguarding Committee and Focal Points

## Constitution

The Safeguarding Committee and departmental focal points have been established by a resolution of Embrace the Middle East's Board of Trustees and will be known as the "Safeguarding Focal Points" (SFP) and "Safeguarding Committee".

## Purpose

To identify and embed appropriate policies and procedures for Embrace the Middle East (Embrace) staff, trustees, volunteers and collaborating third parties in order to safeguard and promote the welfare, dignity and rights of all children, young people and adults at risk we encounter in every aspect of our work; as enshrined in the Human Rights Act 1998 and the 1989 United Nations Convention on the Rights of the Child.

## Roles and Responsibilities

### Designated Safeguarding Lead (DSL)

Responsible for chairing the Safeguarding Committee in line with this ToR, the DSL will work with Safeguarding Focal Points to implement the organisation's safeguarding policy, including training of staff. The DSL will report to the CEO and Trustees, both directly and via the Safeguarding Lead Trustee.

### Safeguarding Focal Points (SFP)

Ultimate responsibility for safeguarding within Embrace rests with the Trustees. SFPs are appointed with the agreement of the Trustees (advised by the CEO) to receive and act as first responders in relation to any concerns raised within the organisation, or by third parties, relating to the possible abuse of a child or adult at risk or any related improper conduct, recording and responding to those concerns in accordance with Embrace's safeguarding policy. Each department will have an SFP within their team to ensure easy and timely communication of any concerns.

SFPs will:

- Act as a focal point to receive information about safeguarding concerns.
- Act appropriately to deal with those concerns, ensuring that all referrals of child and adult at risk concern or possible abuse are dealt with in accordance with standard procedure.
- Ensure that all information is recorded on the incident/disclosure forms and where appropriate referred to the Safeguarding Committee within 24 hours.
- Provide overall support to the wider imbedding of policies and procedures to safeguard children and adults at risk, particularly in relation to their team.

## Safeguarding Committee

The Safeguarding Committee will provide support to the charity's designated SFPs and advise the CEO and Trustees on all safeguarding policies and practices within the charity. It will act as the delegated authority, ensuring that all safeguarding concerns and reports are acted upon in a timely manner in line with charity's policies, the Trustees responsibilities and all statutory guidelines.

The Committee's role will be to:

- Lead on assessing safeguarding risks within the organisation, including its programmes, projects and partners. Where appropriate the committee may seek advice from third parties on the basis of relevant expertise and knowledge within the bounds of statutory confidentiality.
- To decide the correct course of follow-up action when safeguarding reports are made including:
  - Log the complaint and follow the correct reporting procedures.
  - Reporting to local or other relevant external authorities if the matter is criminal in nature.
  - If needed, identifying a plan of action which may include support services to the victim(s) and their families.
  - Appointing and delegating the investigation to an Investigating Officer if the matter is in breach of Embrace's Policy and therefore requires further investigation. Alternatively, an investigation may be carried out by an external agency.
  - Monitoring the progress of the investigation and providing guidance as appropriate. Any report should be completed within 3 weeks and fed back to relevant parties and to the Trustees.
  - Liaising with CEO to decide if a press release is necessary.
  - Making recommendations arising from the outcome of the investigation and based on what is in the best interest of the victim(s).
  - Hold all records and information regarding safeguarding concerns in accordance with the law and GDPR.
  - Disclose concerns (if legally permitted) to prospective employer(s) or organisations that may engage the alleged perpetrator in the event that they are discharged for breaching this or any other policy.
- Committee members must disclose any potential conflict(s) of interest with regard to any safeguarding concern, or report, prior to the committee convening for a review.

If the committee makes a referral to statutory services in the UK, they should implement the following procedure:

- If the child or adult at risk in question is deemed to be at immediate risk, contact the emergency services.
- Make a child or adult at risk protection referral to the statutory services <https://www.bucksfamilyinfo.org/kb5/buckinghamshire/fsd/service.page?id=VLifPWe7Yul> (Buckinghamshire – if it relates to an offense in another county contact that local authority)

- Follow the advice from the statutory services, place a written record of these consultations in the case file<sup>2</sup>.
- Request in writing a receipt from the statutory services of the referral and request to be kept informed of their progress.
- If a concern refers to member of staff, volunteer or is the result of failed policy, an internal investigation should be conducted.

### **Membership & Appointment**

The Chair of the committee will be appointed by the Trustees (advised by the CEO) and will act as the safeguarding “*named person*” for Embrace. The deputy Chair will act as their deputy. In the event of the relevant team SFP being unavailable, incidents should be reported directly to the Chair of the Safeguarding Committee. Each team within the organisation will have a SFP, and these will all sit on the Safeguarding Committee for the duration of their service. The CEO and HR manager are observers to this committee.

### **Attendance and frequency of meetings**

For the purposes of decision making, a quorum is 3 people plus chair. The committee will meet four times per year. The committee will also convene as necessary in the event of a concern or safeguarding incident occurring.

### **Agenda and Papers**

Where possible, the agenda and papers will be issued to members one week before the meeting.

### **Reporting/Accountability**

The committee will report to the Board of Trustees on a six monthly basis with the following information:

- The number of concerns raised or incidents reported in the preceding period
- Any referrals made to statutory or emergency services
- Any action points or improvements regarding current policy or procedures.

Action points from each meeting of the committee will be made available to relevant parties.

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<sup>2</sup> All files relating to safeguarding incidents or information are stored securely online in a compliant manner adhering to GDPR regulations as appropriate

## Safeguarding Reporting Flowchart

