

# Safeguarding Policy

## 1. Introduction

This policy sets out Richmond Parish Lands Charity's (RPLC) approach to safeguarding. RPLC is an independent charitable foundation. Our substantial financial endowment allows us to support local residents through our grant making to individuals and organisations, and subsidised housing.

Safeguarding aims to ensure that everyone connected with our charity is safe and protected from abuse and exploitation. It includes actions to prevent abuse and mitigate the risks of this occurring, as well as actions to ensure any allegations of abuse are taken seriously and anyone experiencing abuse is protected and their welfare promoted.

Safeguarding is a priority for RPLC. By prioritising safeguarding within our internal practices and integrating safeguarding into our overall approach to funding, RPLC plays an important role in promoting practices and organisational cultures which keep people safe.

This policy reflects relevant legislation and statutory guidance on safeguarding within England (see Appendix A). This policy should be read in conjunction with RPLC's Employee Handbook, Trustee Onboarding Pack, Complaints Procedure, Social Media Policy and Data Protection Policy.

This policy is reviewed on an annual basis to ensure policies and procedures reflect current legislation and best practice and take into account any changes within RPLC. The revised policy is approved by Trustees.

This policy was approved by Trustees on 30 April 2024

Date of the next review: April 2025

## 2. RPLC's Position

- RPLC is committed to safeguarding all those connected with our work. In particular, RPLC believes that the welfare of a child or adult at risk is of paramount importance.
- Within the parameters of its role as a landlord and a funder, RPLC is committed to safeguarding children and adults at risk by ensuring RPLC and the organisations we work with and/or fund have appropriate safeguarding mechanisms in place.
- RPLC believes all allegations of harm and abuse must be taken seriously. It has procedures in place to ensure any concern or allegation of abuse is listened to and responded to swiftly and appropriately.
- RPLC aims to promote a healthy safeguarding culture and we encourage a culture of learning to continuously improve our approach to safeguarding.

## 3. Scope

This policy applies to anyone working on behalf of RPLC including employees, trustees and volunteers.

This policy includes the work funded by RPLC and we will make funded partners (grant-holders) and referral partners aware of our policy and the expectations that we have in relation to safeguarding. However, it is the responsibility of the organisations funded by RPLC to ensure that their safeguarding policies and procedures are fit for purpose and are implemented.

This policy also includes safeguarding of at-risk adults and children who are RPLC tenants. In this case we expect our commissioned Property Management Company to have their own safeguarding policy and procedures in place and to ensure those are followed. We will also make them aware of this RPLC's Safeguarding Policy and will expect them to follow it; in the case of any inconsistency, the RPLC policy will take precedence.

## 4. Definitions

Safeguarding children means:

- Protecting children from maltreatment, whether the risk of harm comes from within the child's family and/or outside (from the wider community), including online.
- Preventing impairment of children's mental and physical health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

The definition of a 'child' is anyone who has not yet reached their 18th birthday. The fact, for example, that a child may have become 16 years of age, be living independently, in further education, in the armed forces, in hospital, or in a Youth Offender's Institution does not change their status, their entitlement to services, or their protection under the Children Act 1989.

Safeguarding adults at risk means:

- Protecting their right to live in safety and free from abuse and neglect

The definition of an 'adult at risk', from the [Care Act 2014](#), is any person aged 18 years and over who is or may be in need of care and support (whether or not those needs are being met), who is experiencing or at risk of abuse or neglect, and because of those needs is unable to protect themselves against the abuse or neglect or the risk of it. An adult at risk of abuse may: have an illness affecting their mental or physical health; have a learning disability; have drug or alcohol problems; and/or be frail.

The Care Act 2014 defines ten types of abuse as: physical abuse, domestic violence or abuse, sexual abuse, psychological or emotional abuse, financial or material abuse, modern slavery, discriminatory abuse, organisational or institutional abuse, neglect or acts of omission, self-neglect.

## 4. Roles and Responsibilities

Safeguarding is the responsibility of everyone at RPLC. All employees, volunteers and trustees are expected to read and follow the guidance set out in this policy.

Trustees have ultimate responsibility for safeguarding within RPLC. Our Trustees are responsible for:

- Approving RPLC's Safeguarding Policy and overseeing its implementation and effectiveness, and ensuring this is reviewed on an annual basis
- Ensuring RPLC is compliant with Charity Commission regulations and that all serious incidents are reported to the Charity Commission
- Appointing a Safeguarding Lead who is responsible for championing safeguarding at Board level and providing oversight on high-risk safeguarding concerns. The Trustee Safeguarding Lead is Mary Henes.

The Chief Executive (CEO) has responsibility for:

- Ensuring the safeguarding measures outlined in this policy are implemented

- Ensuring employees, volunteers and trustees have access to appropriate training and support to enable them to fulfil their safeguarding responsibilities.
- Ensuring safeguarding is included in the RPLC risk register and that the level of risk is monitored and reviewed on a regular basis
- Reporting promptly any complaint which is safeguarding-related to the Trustees Safeguarding Lead and the Chair, and informing the Board of Trustees of the complaint at the next Trustee meeting.
- Keeping the Board of Trustees informed on progress and any concerns in relation to safeguarding
- Deputising for the Safeguarding Lead Officer

RPLC's Safeguarding Lead Officer is: Grants Director, Sarah Wilkins ([sarah@rplc.org.uk](mailto:sarah@rplc.org.uk)). The Safeguarding Lead Officer is responsible for:

- Acting as the first point of contact for any safeguarding concern and ensuring appropriate action is taken
- Reporting promptly any complaints which are safeguarding-related to the CEO and the Trustee Safeguarding Lead
- Ensuring RPLC's Safeguarding Policy is reviewed on an annual basis
- Undertaking an annual review of safeguarding incidents and submission of an anonymised report to the CEO and Board of Trustees identifying trends and key learning
- Ensuring employees have access to advice and training to help them fulfil their safeguarding responsibilities, including access to external safeguarding expertise where necessary.

## 5. Safe People

### 5.1 Safe Recruitment

When recruiting new employees, recruitment checks are undertaken to ensure the suitability of all potential candidates. This includes ensuring that:

- A job description and person specification is created for all roles
- Candidates are interviewed to check their suitability against the person specification and job requirements
- Offers of employment will be dependent upon receipt of two satisfactory references and evidence of right to work in the UK

RPLC requires enhanced Disclosure and Barring Services (DBS) checks for the following roles: CEO, Grants Director, Grants Manager, Grants Officer, and Digital Communications Manager. Although these roles do not work directly with children or

adults with care and support needs, there are occasions when they may be alone with children or at risk adults. For example, when visiting an organisation or project, if conducting a focus group, or when interviewing for an individual grant application. RPLC employees, trustees or volunteer who have not had a DBS check cannot be left in sole charge of children or at risk adults with care and support needs and will refuse to do so if asked.

If, in the future, RPLC creates new positions which require regular contact with children or adults at risk, RPLC will use the government online tool to check whether a DBS check is required <https://www.gov.uk/find-out-dbs-check>

## 5.2 Training and Awareness Raising

Upon joining RPLC, new employees, trustees and volunteers will be made aware of their safeguarding responsibilities and provided with support to adhere to these. This includes ensuring that:

- All new employees, trustees and volunteers are briefed on RPLC's approach to safeguarding as part of their induction and are given a copy of this policy.
- Where appropriate, an additional induction to safeguarding is provided by the RPLC's Safeguarding Lead Officer
- Regular role-specific training and guidance is provided to the Trustee Safeguarding Lead and the Safeguarding Lead Officer, with Refresher at least once every three years
- Role-specific training and guidance is provided to members of the Grants Team to help them assess and support safeguarding in the organisations RPLC funds
- Records are kept of training which has been undertaken
- All employees and volunteers receive a refresher briefing on safeguarding following the annual review of the safeguarding policy
- RPLC provide space in meetings and other forums to discuss safeguarding and build knowledge and capacity within the team

## 5.3 Code of Conduct

Our organisational values act as a guide for our employees, trustees and volunteers about how we work at RPLC. As a charity we are committed to maintaining the highest standards of behaviour in all areas of our operations. The RPLC Code of Conduct is set out in the Employee Handbook and the Trustee Handbook. This code of conduct must be adhered to by employees, trustees and volunteers at RPLC.

The Code of Conduct includes that all employees, trustees and volunteers have a responsibility to help ensure children and adults at risk who have contact with RPLC are

protected from abuse. Any concerns about the safety of any individual connected with our work must be reported in line with the Safeguarding Policy.

In addition:

### Contact with funded partners

- Only visit organisations with the prior knowledge of RPLC
- Ask the organisation visited if they have any specific safeguarding measures that should be followed and always adhere to their instructions related to safeguarding at all times
- Do not ask for or accept personal contact details (including social media addresses, contact details, email, phone numbers etc.) from any individuals supported through RPLC grants unless this has been explicitly authorised for business purpose
- RPLC employees/trustees/volunteers who have not had a DBS check cannot be left alone with children or adults at risk when visiting an organisation or project and will refuse to do so if asked
- Ensure that any children or adults at risk attending events arranged by RPLC are accompanied by appropriately checked and qualified staff
- Never engage in a physical/sexual relationship with children or adults at risk or develop relationships which could in any way be deemed abusive or exploitative.

### Handling Personal Data

- Always follow RPLC's data protection policies and procedures when handling personal information
- When using social media refer to the Social Media Policy and never share personal information or data about RPLC's employees, funded partners, or beneficiaries of the work funded by RPLC
- Only take photos and/or video where informed consent has been obtained. Written parental consent should also be obtained for children aged 16 or under
- When using images in reports, presentations or other communication materials never include the person's full name or include details that could identify the person's exact location.

## 6. Internal Reporting Procedures

Anyone who is alerted to a safeguarding concern, or who observes an issue which causes concern in any work RPLC funds or is involved with must report this at the earliest opportunity to the Safeguarding Lead Officer. You should record what you have seen or heard as soon as possible. The report form in Appendix B should be completed with the

support of the Safeguarding Lead Officer. You must never promise to keep a concern a secret.

You should not take action yourself as this could place you or others at risk. However, in an emergency, where people are in immediate danger, you should call 999.

RPLC's Safeguarding Lead Officer is responsible for ensuring that all concerns are taken seriously, listened to and responded to in a timely and appropriate manner. This includes but is not limited to:

- Where a child or adult at risk is suffering or at risk of significant harm, notifying the local authority and/or police
- Cooperating fully with any actions or investigations which may be initiated by statutory services
- Ensuring support is provided to any RPLC personnel who may have been affected, including the person reporting the concern
- Maintaining a confidential record of the concern, actions taken and any learning or improvements which could help prevent similar incidents in the future

Where the concern relates to the conduct of a RPLC employee, volunteer or trustee, RPLC's Safeguarding Lead Officer will also:

- Inform the HR and Finance Director and CEO as it may be necessary to suspend the individual while further investigations are carried out, in line with RPLC's Disciplinary Procedure.
- Inform the CEO and the Trustee Safeguarding Lead so that they can provide oversight and support to ensure a robust response
- Advise the Chair of Trustees that a serious incident report should be submitted in line with Charity Commission requirements<sup>1</sup>

If the concern relates to the conduct of the Safeguarding Lead Officer then advice should be sought from the Trustee Safeguarding Lead (email via [finance@rplc.org.uk](mailto:finance@rplc.org.uk)).

Anyone who believes that RPLC has failed to take appropriate action in relation to safeguarding concerns, should report this to the Trustee Safeguarding Lead or make a report via RPLC's Whistleblowing Policy (see Employee Handbook).

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<sup>1</sup> The Charity Commission's serious incident reporting regime requires trustees to report serious incidents. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to a charity's work, beneficiaries, staff, volunteers or others who come into contact with the charity through its work
- loss of a charity's money or assets
- damage to a charity's property
- harm to a charity's work or reputation

Figure 1: What to do if you are concerned about a child or an adult at risk?



\*If the SLO is not available contact the CEO Phil Barron, [philip@rplc.org.uk](mailto:philip@rplc.org.uk) 020 3747 9354.



## 7. Safeguarding within Grant Making

### 7.1 Application & Assessment Stage

Partners to whom we make grants must have appropriate safeguarding procedures in place. Applicants are required to submit their Safeguarding Policy with their application. All organisations must have a safeguarding policy that is dated and has been reviewed within the last 2 years. As a minimum the safeguarding policy must include:

- A recruitment procedure
- Reference to when a DBS search disclosure/check is required for representatives of the organisation
- A named designated safeguarding officer for the organisation (with their contact details)
- An outline of reporting/disclosure procedures and escalation (including managing allegations against staff and volunteers and reporting to trustees).

If any of these minimum requirements are not in place, a condition will be added to any grant awarded by RPLC and no funding can be paid by RPLC until this condition has been met.

RPLC aims to promote excellence and good practice with regard to safeguarding policies and procedures which go over and above minimum requirements. We request that applicants review the RPLC [Safeguarding Policy Checklist](http://www.rplc.org.uk/grant-making) at [www.rplc.org.uk/grant-making](http://www.rplc.org.uk/grant-making) which has information about best practice and links to useful resources.

Although RPLC may discuss safeguarding with applicants, it is not able to provide advice and support around the development of safeguarding policies and procedures. If an applicant or organisation RPLC works with requires advice, we will refer them to Richmond CVS and to the other resources on the [Safeguarding Policy Checklist](#).

### 7.2 Terms and Conditions

Once funding is approved, RPLC's funding agreements outline our expectations in regard to safeguarding for those that we fund. This will include the requirement to notify us of any serious incident report (as defined in Charity Commission guidance) your organisation makes to the Charity Commission during the lifetime of our grant or any serious incidents that meet this threshold if you are not regulated by the Charity Commission.

### 7.3 Monitoring

RPLC will monitor safeguarding in the following ways:

- Monitoring Reports include a question asking funded partners to inform RPLC of key risks within their organisation. This includes safeguarding risks and funded partners will be required to inform RPLC of any safeguarding incidents in response to this question.
- If the funded partner has multi-year funding they will be required to submit their latest Safeguarding Policy with their annual Monitoring Report
- Where the funded work involves work with children or adults at risk, safeguarding will be included as an agenda item for monitoring calls/visits with funded partners.

### 7.4 Reporting of Safeguarding Incidents within Funded Partners

Funded partners are asked to inform RPLC of any serious safeguarding incidents as soon as it is reasonably possible after it happens<sup>2</sup>, in line with Charity Commission guidelines. This will usually be if the following occur:

- Incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the grant-funded charity (adults or children) which have resulted in or risk significant harm to them and:
  - this happened while they were under the care of the grant-funded charity
  - someone connected with the grant-funded charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual)
- Other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the grant-funded charity through its work, which have resulted in or risk significant harm to them and are connected to the charity's activities
- Breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity.

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<sup>2</sup> <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

We do not require immediate reporting as the priority must always be for the organisation to take action to protect everyone involved. However, we do ask that funded partners report safeguarding incidents to us as soon as possible and within one working week. Our aim, when receiving reports, is to ensure that appropriate action has been taken and learning identified to prevent similar incidents in the future. The responsibility for responding to the concern, including notifying relevant authorities and the regulator, rests with the funded partner and should be undertaken in line with their own safeguarding procedures.

Whenever a safeguarding incident is reported to RPLC by a funded partner the Safeguarding Lead Officer will be notified, so as to provide guidance on what further information is required.

Where RPLC is satisfied that appropriate action has been taken, we will simply thank the funded partner for sharing details of the concern and their response. A confidential record of the incident will be made using the form in Appendix B.

If further information is required, the relevant member of the Grants Team will:

- Contact the funded partner at the earliest possible opportunity, unless doing so would place individuals at further risk
- Discuss what actions the funded partner has taken or plans to take to address the concern, including details of any investigation and/or referral to statutory agencies
- Discuss timescales for action and ensure that the funded partner informs RPLC of progress and outcomes
- Ensure that the funded partner has referred any serious incidents to the Charity Commission in line with Charity Commission guidance

The additional information will be shared with the Safeguarding Lead Officer who will determine whether RPLC is satisfied with the response. A confidential record of the incident will be made using the form in Appendix B.

When discussing safeguarding incidents with funded partners:

- RPLC will avoid imposing actions as it is important that the funded partner follows their own procedures and internal processes
- Employees should not offer advice around safeguarding as RPLC does not have the resources or expertise around this specialist area. If an applicant or organisation

RPLC works with requires advice, we will refer them to Richmond CVS and to the other resources on the [Safeguarding Policy Checklist](#)

- RPLC will only step in to report safeguarding issues to the police or other statutory services if the organisation has failed or refused to do so and RPLC has reasonable grounds to believe that this places individuals at continuing risk of significant harm or abuse
- RPLC will only notify the Charity Commission of safeguarding incidents within a funded partner if the funded partners refuses to do so or the incident is likely to have a material impact on RPLC
- If a funded partner is unable or unwilling to respond appropriately to safeguarding concerns, we may suspend existing funding and/or pause consideration of any application for future funding until improvements are made. The decision to pause funding will be taken by the CEO in discussion with the Grants Director.

## Appendix A: Legal Context and Useful Resources

### a) Duties under Charity Law

RPLC is regulated by the Charity Commission for England and Wales. We have duties under the [Charities Act 2011](#) and our trustees seek to comply with their duties as summarised in [CC3: The essential trustee: what you need to know, what you need to do](#).

In developing this policy, we recognise the specific duties set out by the Charity Commission for [safeguarding and protecting people](#) and [protecting charities from abuse for extremist purposes](#). As a Funder we also recognise the specific responsibilities the Charity Commission establishes on funders to carry out [due diligence checks on beneficiaries and local partners](#) and how to monitor end use of funds.

### b) Legislative Framework for Safeguarding

This policy and any associated procedures and guidance were developed with reference to key domestic legislation to safeguard and promote the welfare of children and adults at risk of harm affected by our work.

Children	Adults at Risk
Children Act 1989 & 2004, Protection of Children Act 1999 and Safeguarding Vulnerable Groups Act 2006, Working Together to Safeguard Children (2018) and Keeping Children Safe in Education (2021)	Care Act 2014 and Care and support statutory guidance (2020) and Mental Capacity Act 2005,
The Counter-Terrorism and Security Act 2015, Domestic Abuse Act 2021.	

### c) Wider duties

We recognise our wider duties of care including under the Data Protection Act 2018, Public Interest Disclosure Act 1998, and the Equality Act 2010. We work in line with duties and principles of the Malicious Communications Act 1988, Communications Act 2003, Computer Misuse Act 1990, the Serious Crime Act 2015 and the Age appropriate design: a code of practice for online services (2020).

## d) Useful Safeguarding Resources

### Child safeguarding

- [Richmond CVS Child Safeguarding Information and Resources](#)
- [Kingston and Richmond Safeguarding Children Partnership](#)
- [Kingston and Richmond Safeguarding Children Partnership](#) free training offer
- [NSPCC guidance](#) on developing a safeguarding policy and procedures

### Adult safeguarding

- [Richmond and Wandsworth Adult Safeguarding Board](#)
- [Community resources - Richmond and Wandsworth Safeguarding Adults Board](#) ([sabrichmondandwandsworth.org.uk](http://sabrichmondandwandsworth.org.uk))
- [Richmond and Wandsworth adult safeguarding training](#)
- [London Multi-Agency Adult Safeguarding Policy and Procedures](#)
- [Hourglass](#) offers information relating to the harm, abuse and exploitation of older people in the UK

### General safeguarding

- The [Funder Safeguarding Collaborative](#) offers members access to webinars, resources, training and capacity building tailored to the needs of funding organisations.
- [NCVO resources and guides](#) to help organisations do safeguarding well
- [Ann Craft Trust](#) resources to assist organisations in achieving best practice in safeguarding
- Charity Commission [resources](#) highlighting Trustee safeguarding responsibilities
- [Eligibility guidance for standard DBS checks](#)
- Guidance on the legal duty to refer [Making barring referrals to the DBS - GOV.UK](#) ([www.gov.uk](http://www.gov.uk))
- [Catalyst](#) offers a selection of information on safer working online. Resources are aimed at voluntary organisations, small groups, organisations and charities working in the UK.

## Appendix B: Safeguarding Report Concerns and Actions

### Confidential

Concerns reported by:		Report Received by:	
Name of child or adult at risk:		Safeguarding lead:	Sarah Wilkins <a href="mailto:sarah@rplc.org.uk">sarah@rplc.org.uk</a> 020 3747 9352
Funder Partner name (if applicable):		Date concern raised:	
Outline Description of Issues/Concerns:			
Detail of Concern: Identifying who is involved, when the concern arose, what the concern is and why			
Safeguarding lead actions Including referrals to other organisations/individuals informed:		Date:	
Trustee Safeguarding Lead informed:		Date:	
RPLC Next Steps/Review Date/Follow Up/Close/Learning		Date:	
Signed – Reporting Person		Date:	
Signed – Safeguarding lead		Date:	