Organisation Name	**Grand Organisation Ltd**
Policy Title:	**Safeguarding policy**
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Review Cycle:	**Annually**

Policy Approval and Sign-Off

Name	Title	Signature	Date
John Paul	Policy Owner	J.P	31/01/2025
Jane Kamau	CEO	J.K	31/01/2025

This policy is subject to change in accordance with new legislation and supersedes any earlier dated policy, procedure, agreement or arrangement.

1.Policy Statement

Grand Organisation Ltd believes that everyone with whom we come into contact, regardless of sex, age, gender identity, disability, sexual orientation, ethnic origin, religion or caste, has the right to be protected from all forms of harm, abuse, neglect and exploitation.

Grand Organisation Ltd is committed to providing a healthy and safe working environment. We have a zero-tolerance approach, and will not tolerate bullying, harassment, sexual or any other type of exploitation or abuse in any form by staff or associated personnel. Grand Organisation Ltd will apply our Disciplinary Policy where breaches of this policy occur.

This policy will address the following areas of safeguarding: child safeguarding, vulnerable adult safeguarding, and protection from sexual exploitation and abuse.

3. Scope and Purpose

The purpose of this policy is to protect people, particularly children, young people and vulnerable adults, from any harm that may be caused due to their coming into contact with Grand Organisation Ltd directly or indirectly, through staff, partners, suppliers or associated personnel (including board members, volunteers and consultants).

This protection includes harm arising from the conduct of staff or personnel associated with Grand Organisation Ltd and the design and implementation of Grand Organisation Ltd's projects and business activities.

The policy lays out Grand Organisation Ltd's commitments, as articulated in this policy and informs staff and associated personnel of their responsibilities in relation to safeguarding. This policy does not cover:

- Bullying and harassment, for which Grand Organisation Ltd has a specific Prevention of Bullying & Harassment Policy for these harms.
- Safeguarding concerns in the wider community not perpetrated by Grand Organisation Ltd or associated personnel.

This policy is aligned with all relevant national and international standards.

This policy applies to all persons affiliated with Grand Organisation Ltd, including full or part-time staff, directors, consultants, contractors, and suppliers. Safeguarding applies consistently and without exception across all our business activities and associated personnel. It requires proactively identifying, preventing and guarding against all risks of

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harm, exploitation and abuse, and having mature, accountable and transparent systems for response, reporting and learning when issues arise. Those systems will be survivor-centred and protect those accused until proven guilty.

4. Definition of Safeguarding

In Grand Organisation Ltd, safeguarding means protecting people's health and well-being and enabling them to live and work free from harm, abuse, and neglect. It means protecting people, including children and vulnerable adults, from harm that arises from coming into contact with our staff, associated personnel, or business operations.

Further definitions relating to safeguarding are in the glossary at the bottom of this page.

5. Principles

Grand Organisation Ltd bases our safeguarding policy on these principles:

- Policies alone are not enough to prevent abuse, and we will shift organisational culture to tackle power imbalances and gender inequality, the responsibility for which lies with our board and executive director.
- We will ensure that safeguards are integrated throughout the employee lifecycle so that we ensure checks are in place at the start of employment and regular training and performance management, reinforced by the Code of Conduct.
- We will ensure accountability through reporting and complaints mechanisms for any misconduct that occurs in the course of our business operations, including by associated personnel. We will pursue all reported misconduct to the full extent using Grand Organisation Ltd procedures and refer to appropriate statutory regulatory authorities.
- We will ensure that concerns are heard and acted on through our Whistleblowing Policy, and actively promote the reporting of safeguarding concerns.

6. Prevention

6.1. Grand Organisation Ltd Responsibilities

We will exercise prevention in these ways:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and associated policies.
- Design and undertake all business activities and operations in a way that protects people from any risk of harm that may arise from their coming into contact with Grand Organisation Ltd. This includes the way in which we gather, store, communicate, or make public any information about individuals in our projects, via formal Grand Organisation Ltd channels and on staff personal social media.

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- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to the processes set out in the due processes described in the associated policies.

6.2. Staff Responsibilities

6.2.1. Child Safeguarding

Grand Organisation Ltd staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional, or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.
- Undertake any activity with a child, including, but not limited to, conversations, interviews, photos or video, audio taping or requesting any action of them, without ensuring their safety and well-being during and after the engagement, ensuring ethical photo, videoing or audio taping, and having the express, fully informed, written or taped consent of a parent or adult guardian or caregiver.

6.2.2. Vulnerable Adults

Grand Organisation Ltd staff and associated personnel must not:

- Sexually abuse or exploit vulnerable adults.
- Subject vulnerable adults to physical, emotional or psychological abuse, or neglect.
- Undertake any activity with a vulnerable adult, including, but not limited to, conversations, interviews, photos or video, audio taping or requesting any action of them without ensuring their safety and well-being during and after the engagement, ensuring ethical photo, videoing or audio taping, and having their express, fully informed, written or taped consent of a parent or adult guardian or caregiver.

6.2.3. Protection from Sexual Exploitation and Abuse

Grand Organisation Ltd staff and associated personnel must not:

- Exchange money, employment, goods, or services for sexual activity.
- Engage in any sexual relationships with vulnerable clients or customers, since such relationships are based on inherently unequal power dynamics.
- Additionally, Grand Organisation Ltd staff and associated personnel are obliged to:
- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Safeguarding Policy.

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- Report any concerns or suspicions regarding safeguarding violations by Grand Organisation Ltd staff or associated personnel.

6.2.4. Forms of Abuse on Vulnerable Adults

- **Physical abuse** – including hitting, slapping, pushing, kicking, unnecessary restraint and wrongly administering medicine.
- **Sexual abuse** – including sexual assault, rape, or sexual acts to which the vulnerable adult has not or could not have consented or pressurising vulnerable adults into sexual acts they do not understand or feel powerless to refuse.
- **Emotional abuse** – including verbal abuse, shouting, swearing, threatening abandonment or harm, taking away privacy, intimidation, harassment and being prevented or denied receiving services or support.
- **Financial or material abuse** – including withholding money or possessions, theft of money or property, fraud, borrowing money and not repaying, pressure in connection with wills or inheritance.
- **Discriminatory abuse** – including the maltreatment due to a person's race, gender, poor mental health, inability or disability, age, faith, culture or sexual orientation.
- **Institutional abuse** – including the use of systems and routines which neglect a person receiving care. This sometimes happens when people are mistreated in residential or nursing homes or hospitals.

Indicators of abuse on vulnerable adults

- Injuries, bruises or scars, non-accidental broken bones.
- Weight loss.
- Lack of personal care.
- Bills not being paid.
- Sudden loss of assets, friends, or family or threats to gain access to someone's money, or pressure to change their will.
- Not getting to medical appointments.
- Showing uncharacteristic changes in behaviour or mood.
- Isolation from usual network of friends, family or community.
- Becoming withdrawn and uncommunicative.

Who can abuse?

- An abuser could be anyone who has the power over the vulnerable adult at a particular point in time and can include those closest to them e.g. family or carers.

7. Reporting

All Grand Organisation Ltd staff and associated personnel have a duty and right to report any concerns or suspected safeguarding incidents. Failure to do so may result in disciplinary action, as well as any legal action required by law.

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Grand Organisation Ltd will accept complaints from staff and associated personnel, and from external sources, such as clients, customers, and official bodies.

7.1. How to Report a Safeguarding Concern

Grand Organisation Ltd will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and stakeholders. Complaints related to safeguarding should be reported either to the Safeguarding Officer or through the Whistleblowing Policy. Any staff using the Whistleblowing Policy will be protected.

7.2. Response

Grand Organisation Ltd will follow up safeguarding reports and concerns according to statutory obligations and all applicable policies and procedures. Grand Organisation Ltd will appoint an investigator to review each complaint. The investigator will normally be a senior staff member, though Grand Organisation Ltd reserves the right to engage an external investigator.

Grand Organisation Ltd will apply appropriate disciplinary measures to staff and associated personnel found in breach of our Safeguarding Policy. Grand Organisation Ltd will cooperate fully with any legal investigation and will report any criminal concerns to appropriate authorities.

Grand Organisation Ltd will offer professional support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Ultimately, decisions about support will be led by the victim or survivor.

7.3. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to a concern and subsequent case management will be shared on a need-to-know basis only and will be kept secure at all times in accordance with the Grand Organisation Ltd Data Protection Policy.

8. Governance of Safeguarding

Grand Organisation Ltd's leadership is fully committed to ensuring that safeguarding and its associated policies and processes are central to our governance and accountability to the public, our clients, partners, and customers. Safeguarding will be managed and reported to the Board through the mechanisms set up to ensure effective management and implementation of all our policies and processes:

- The designated Safeguarding Officer reports to the Executive Director who in turn reports to the Chair of the Board of Directors. The Safeguarding Officer will normally be the most senior Human Resources staff member, or alternatively a senior staff member appointed by the Executive Director.

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- The Safeguarding Officer keeps a detailed register of any safeguarding issues raised and actions taken to resolve them.
- As part of the Recruitment Policy, Grand Organisation Ltd will conduct criminal background checks on candidates for roles involving work with children or vulnerable adults.
- As part of our Recruitment Policy, Grand Organisation Ltd will collect and verify references from two of the candidate's most recent line managers for all employees and directors.
- Mandatory training on safeguarding will be provided to new personnel during induction and at regular times throughout employment. This includes training on prevention, reporting, response, and support.

9. Safeguarding Obligations for Grand Organisation Ltd Associated Personnel or Organisations

Grand Organisation Ltd will share this safeguarding policy with its partners and suppliers and other associated personnel or organisations. They must agree to having their own safeguarding policy and procedures in place in a formal policy and any associated policies to ensure safeguarding issues are escalated to their highest governance body. If any of these parties do not have such policies and processes in place, or Grand Organisation Ltd deems them to be insufficient, they may be asked to sign an agreement to abide by our policies or we may choose not to enter into a contractual or other recognisable relationship with them.

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Glossary of Terms

- **Vulnerable adult** An adult is a vulnerable if they may be unable to protect themselves from harm or exploitation due to their age, a disability, or physical or mental health condition.
- **Child** A person below the age of 18.
- **Harm** Psychological, emotional, physical, and any other infringement of an individual's human rights.
- **Psychological harm** Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment, such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.
- **Protection from sexual exploitation and abuse** This term refers to the prevention of sexual exploitation and abuse of vulnerable individuals by staff or associated personnel.
- **Sexual abuse** Sexual abuse means the actual or threatened physical intrusion of a person(s) on another in sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual exploitation** Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation by a person(s) of another person. This definition includes human trafficking and modern slavery.
- **Survivor** A person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

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