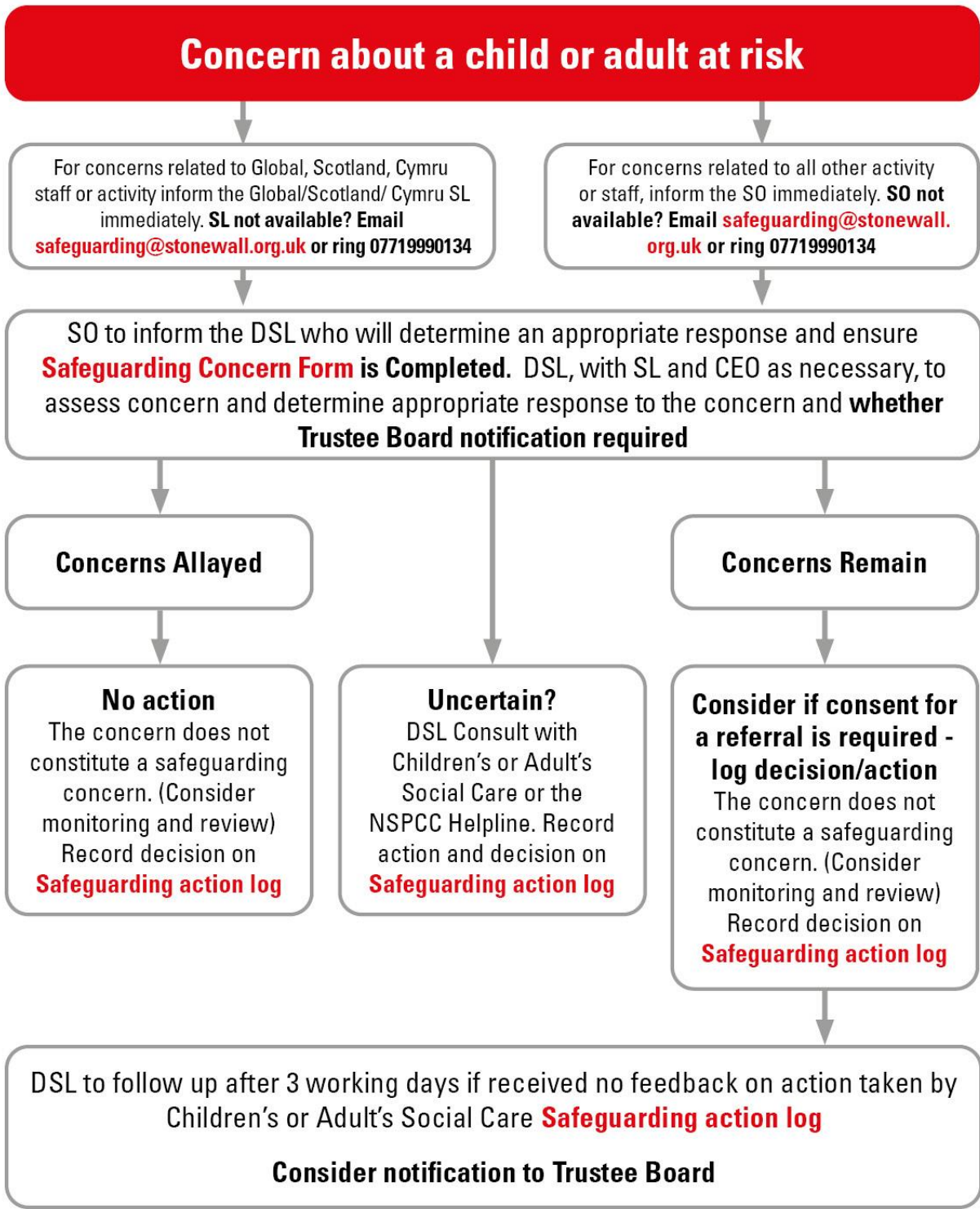


Responding, recording and reporting to safeguarding concerns

IF AN EMERGENCY REFER TO THE POLICE OR EMERGENCY SERVICES AND INFORM THE SO AND DSL OR LOCAL SAFEGUARDING LEAD IMMEDIATELY. FOR ADVICE CONTACT NSPCC HELPLINE 0808 800 5000 OR RELEVANT LOCAL AUTHORITY SAFEGUARDING TEAM (CHILD PROTECTION OR ADULT AT RISK).



Key to flowchart

SO - Safeguarding Officer

SL - Safeguarding Lead

DSL - Designated Safeguarding Lead

CEO - Chief Executive

In line with our partnership agreement with The Rainbow Project in Northern Ireland, all safeguarding concerns related to activity in their premise or connected to their staff or activities to use their safeguarding policy and procedure. For further information, please contact the DSL

Overarching Safeguarding Policy (UK)

December 2020

1. Purpose

Stonewall's mission is to advance the human rights of lesbian, gay, bi and trans (LGBT) people through: empowering individuals, transforming institutions, changing hearts and minds and campaigning to change and protect legislation.

Safeguarding is extremely important to Stonewall. We believe that no one should ever have to experience or risk experiencing abuse, exploitation or neglect. We are committed to proactively safeguarding and promoting the welfare of our beneficiaries, as well as taking all reasonable steps to ensure that those who come into contact with Stonewall or its programmes do not, as a result, come to any harm.

This policy relates to Stonewall's safeguarding activity in the UK. Its purpose is to:

- Protect children and adults at risk who engage with Stonewall.
- Make our approach to safeguarding clear to staff, volunteers, supporters and everyone who engages with us.

2. Scope

These procedures apply to all of our work in the UK, except where projects or programmes have bespoke safeguarding procedures. All bespoke safeguarding procedures will be agreed by Stonewall's Designated Safeguarding Lead.

These procedures only apply to safeguarding concerns. If you are unsure whether something is within the scope of these procedures, seek advice from the Designated Safeguarding Lead.

If volunteers, beneficiaries or members of the public have complaints about Stonewall, its staff or partners **that do not relate specifically to the welfare children and adults at risk**, they should follow the procedures set out in Stonewall's Complaints Policy.

For Stonewall's staff: Compliance with these procedures is mandatory (as defined below).

For Stonewall's trustees: Since board members and trustees must act at all times in the best interests of Stonewall and its beneficiaries, they are also expected to comply with these

procedures. This expectation is made clear to board members and trustees in their trustee induction process and during board meetings.

For partnership organisations: Stonewall has agreements in place with all partners. These require partners to provide the same, or higher, level of safeguarding for children, adults at risk and those coming into contact with the partner as those set out in these procedures. Partners must have either their own safeguarding procedures or equivalent document in place, and must implement procedures which include substantially the same principles, expectations and responsibilities as these procedures. Otherwise, they must abide by Stonewall's safeguarding procedures as detailed in this document.

Failure to comply with the Stonewall safeguarding policy may be managed in a number of ways, depending on the nature and consequences of any incident. In some cases, a combination of responses may be required, including:

- Local authority co-ordinated safeguarding investigation
- Police investigation
- Referral to the Disclosure & Barring Service (DBS), Disclosure Scotland or AccessNI
- Serious incident reporting to The Charity Commission in line with our Serious Incident reporting procedure
- Internal review or co-operation with an external review
- Disciplinary Action and/or termination (for staff and trustees)
- Enforcement Action in accordance with the agreed partnership arrangements (for partners)

It is the responsibility of **all** who work with Stonewall to act if there is a cause for concern about a child or an adult at risk.

3. Principles

We believe that:

- No one should ever experience abuse, exploitation or neglect.
- It is everyone's responsibility to safeguard children and adults at risk from abuse and to take action when made aware of the risk of harm.
- In line with [UK legislation](#), Stonewall recognises that it has particular responsibilities to safeguard and promote the welfare of:
 - all children who engage in Stonewall activities, including the children of adults that use Stonewall services or attend Stonewall events.
 - all adults at risk who engage in Stonewall activities.

We recognise that:

- The welfare of the child or adult at risk is paramount, including when considering disclosure of confidential information.

- All children and adults at risk, regardless of age, disability, gender identity, racial heritage, nationality, religion or belief, sex or sexual orientation, have a right to equal protection from all types of harm or abuse.
- Some children and adults at risk are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues. Research shows that LGBT people are at a higher risk of abuse.

4. Our definitions

Child: means anyone under the age of 18ⁱ, irrespective of the age of majority in the country where they live or were born.

Adult at risk: means anyone aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Safeguarding: means actions we take to prevent harm to children and adults at risk, and actions we take to protect children and adults at risk where harm has occurred or is likely to occur without intervention. Further definitions of the terms used are in appendix 2 [add link].

Stonewall Designated Safeguarding Lead ('DSL'): means the member of Stonewall staff designated as the contact person for all safeguarding issues. We also have local safeguarding leads in our nations offices and Global team, and a Deputy DSL (UK) who is accountable for addressing safeguarding issues if the DSL is absent.

Where local safeguarding leads exist, decisions to refer will be made in conjunction with the DSL. The DSL will remain accountable for ensuring is accountable for making sure the safeguarding risk is managed properly. Any safeguarding issues in which the DSL is implicated or has a conflict of interest are dealt with by the Chief Executive Officer [SEE CHART].

'Safeguarding Lead Trustee': means the trustee nominated to have oversight of Stonewall's safeguarding arrangements and liaise with the DSL. Safeguarding remains a collective responsibility of all trustees and the Safeguarding Lead Trustee is required to report back and share information with the full board of trustees as appropriate.

'Staff': means anyone who works for, or is engaged by, Stonewall (or its partner where the context requires). This can be in a paid or unpaid, full time or part time, capacity. This includes directly employed staff, contractors, agency staff, consultants, volunteers, interns and equivalents.

6. Recognising, responding and reporting concerns

Stonewall is committed to providing safe, appropriate and accessible routes for reporting safeguarding concerns. We will respond efficiently and sensitively to all allegations and suspicions of abuse and harm against children or adults at risk.

Recognising a safeguarding concern:

A safeguarding concern may arise in several ways. The following are examples of how a safeguarding concern may come to your attention:

- You may witness abuse or harm taking place;
- A child, adult at risk or other person may tell you that they have suffered abuse or harm, or are fearful of suffering abuse or harm;
- You may notice behaviour which gives rise to a suspicion that a child or adult at risk has been harmed or is at risk of harm.

Recognising harm or risk of harm can be complicated and it is not Stonewall's responsibility to decide whether harm has occurred. However, it is our responsibility to look out for signs of abuse and harm and act if there are any concerns. You should therefore ensure that you are aware of the risks of abuse and harm which include:

- **physical abuse:** including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint.
- **domestic abuse:** including psychological, physical, sexual, financial, or emotional abuse. It also covers so-called 'honour'-based violence.
- **sexual abuse:** including rape, indecent assault, inappropriate touching, exposure to pornographic material, abuse of a position of trust.
- **psychological or emotional abuse:** including belittling, name-calling, threats of harm, intimidation, isolation and 'conversion' therapy.
- **bullying, harassment, cyber bullying or discriminatory abuse:** including racist, sexist, biphobic, homophobic, transphobic abuse; abuse based on a person's disability and other forms of harassment; slurs or similar treatment.
- **criminal exploitation:** including by criminal gangs and organised crime groups such as county lines, trafficking, online abuse, sexual exploitation and the influences of extremism leading to radicalisation.
- **financial or material abuse:** including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits.
- **modern slavery:** covering slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.
- **neglect and acts of omission:** including withholding the necessities of life such as medication, food or warmth; ignoring medical or physical care needs.
- **self-neglect:** covering a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding.
- **institutional or organisational abuse:** including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment.
- **female genital mutilation,** forced marriage and other 'honour-based' violence.

Abuse may be carried out deliberately or unknowingly. Abuse can be a one-off incident or repeated, ongoing ill treatment. People who behave abusively come from all backgrounds and walks of life. They may be relatives, friends, neighbours, or people who are benefitting from the same Stonewall programme as the person experiencing abuse.

If you are concerned that someone is at immediate risk of harm, whether because of something you have witnessed or something you have been told, you should take steps to ensure that person is not in immediate danger (for example by contacting the emergency services). Where possible, seek advice from the DSL, but do not delay taking action to consult the DSL if that may increase the risk of harm.

6.2 Responding to disclosure of harm or risk of harm:

If someone tells you that they or another person have been harmed or are at risk of harm:

- Listen carefully.
- Avoid asking detailed or leading questions, but do try to confirm basic information about who, when, where, what and whether they are at imminent risk of harm.

Explain to them that:

- You (and Stonewall) take what they are saying seriously.
- You will need to share that information with the DSL, who will make a decision about whether the information should be shared with relevant agencies in order to protect the child or adult at risk.

Do not attempt to intervene directly in relation to a safeguarding concern or provide children and adults at risk with personal contact details. This risks further harm, including to yourself. You should make it clear that you will be sharing information with the DSL, who is a trained and experienced person and will be able to take the right actions, including signposting to appropriate bodies and/or specialist organisations that are better able to help.

6.3 Reporting a safeguarding concern to the DSL:

Staff are required to report any concerns or suspicions of harm or risk of harm as soon as possible and **no later than 24 hours after being made aware of the concern**.

All concerns should be reported to the DSL, using the [Safeguarding Concern Form](#). If the DSL is not available, concerns should be reported to the Deputy DSL. If the DSL is implicated or may have a conflict of interest in relation to the concern, it should be reported to the Chief Executive.

Otherwise, keep the matter strictly confidential and do not seek to investigate the incident or suspicion yourself, as you may cause further harm. You should not discuss the matter with anyone else and must ensure that all information (including the Safeguarding Concern Form) is stored securely and in accordance with data protection law.

The names of the DSL, Deputy DSL, Global, Cymru and Scotland DSLs and the Safeguarding Lead Trustee can be found in the 'Contact Information' section at the end of these procedures.

6.4 What happens when you report a safeguarding concern

From the point at which a concern is reported, **the DSL is accountable for making sure the safeguarding risk is managed properly.**

The DSL will take the following steps (subject to specific advice or guidance provided by the relevant authorities):

- Confirm that the individual(s) involved are safe.
- Address any gaps in the information provided to them, being careful to only seek the information needed to make a decision about appropriate next steps.
- Where the concern relates to an adult at risk, check that their views have been sought and recorded and that they are kept informed of any actions we take in response to the safeguarding concern. Where we are taking action that is not in line with the adult's wishes, the DSL is accountable for making sure the person understands why we are taking that step.
- If the report relates to a third-party organisation, the DSL should, if it is appropriate and safe to do so, notify the safeguarding lead or other appropriate person in that organisation as soon as possible and agree joint actions.

6.5 Disclosure and onward referral:

Where there is evidence that abuse or harm has occurred or is at risk of occurring, the DSL will contact the relevant safeguarding authorities to disclose information. In most cases, the relevant authorities will be the Local Authority, though in some instances the appropriate authority may health services.

If the abuse or harm appears to be of a criminal nature, the DSL will also contact the Police.

Decisions to report to external authorities will be fully risk assessed and anonymisation/pseudonymisation considered when necessary. Reporting will not be avoided on the basis that it may harm Stonewall's reputation or give rise to litigation. Any concerns in relation to data protection will not act as a barrier to reporting, although they will be carefully considered to ensure that the disclosure is made within the legal framework.

Decisions about whether or not to report concerns to external authorities must be kept under review as a concern is handled, in case the provision of additional information indicates that such decision may need to change.

Stonewall will fully co-operate with relevant authorities and provide all reasonably practicable assistance during the course of any external authority's investigation. Staff must not do anything that may compromise the authority's investigation.

Disclosure of suicidal behaviour

Children:

Where a child clearly expresses suicidal thoughts and intentions and/or discloses recent suicide behaviours, a safeguarding concern form will be submitted in line with our policy on recognising, recording and reporting concerns. Where appropriate, this concern will be disclosed to the relevant authority.

Wherever possible, we will do this with the consent of the child or young person and, where appropriate, their primary caregivers. **However, we will always raise a concern and disclose risk of suicide to the relevant authorities, whether or not consent is given.**

Adults:

Where an adult clearly express suicidal thoughts and intentions and/or discloses recent suicide behaviours, they will be considered an adult at risk and a safeguarding concern form will be submitted in line with our recognising, recording and reporting concerns policy for consideration of disclosure to the relevant authority.

Wherever possible, we will do this with the consent of the adult at risk, by supporting them to seek help from mental health services. **However, we will always raise a concern and disclose risk of suicide to the relevant authorities, whether or not consent is given.**

Internal investigations & actions

Where there is an external investigation by the Police, Stonewall will not conduct any internal investigation until such time as a charging decision is made. However, in the case of allegations against staff or volunteers, they will take steps to protect children and vulnerable adults in the interim. This includes suspending staff or volunteers from their duties where necessary.

In all other cases, having made an onward referral, the DSL will make a decision as to whether an internal investigation is needed. This may be to improve existing practices or take necessary steps in relation to poor conduct or failure to follow policy by staff or volunteers. [LINK TO DISCIPLINARY POLICY]

Stonewall will in all cases consider whether any referral ought to be made to the Disclosure and Barring Service in England or its equivalent in other UK jurisdictions under country-specific legislation.

Charity Commission reporting

Stonewall is committed to reporting all serious incidents to the Charity Commission for England and Wales [(the '**Commission**')] via a serious incident report¹ and/or to the Office of the Charity Regulator and/or the Charity Commission for Northern Ireland (together, the '**Charity**

¹ Refer to the Charity Commission's serious incident guidance for more information: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>. The Commission has also published supplementary guidance setting out its expectations in relation to reporting incidents in partner organisations: <https://www.gov.uk/guidance/reporting-a-serious-incident-in-your-charity-when-it-involves-a-partner>.

Regulators’), in line with their respective procedures and Stonewall’s Safeguarding incident risk rating:

<p>Severe risk</p>	<p>A beneficiary or other individual connected with the charity’s activities has/alleges to have suffered serious harm, for instance:</p> <ul style="list-style-type: none"> • Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary while under the charity’s care • Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer • A staff computer is found to contain images of child sexual abuse • A beneficiary or individual connected with the charity’s activities has died or been seriously harmed; a significant contributory factor is the charity’s failure to implement a relevant policy • Stonewall failed to carry out DBS/PVG or equivalent checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position • Breach in safeguarding policy/procedure presents risk of legal action • And/or High Risk and there is a likelihood of reputational damage and loss of trust for Stonewall. <p>Immediate escalation to Trustee Board for consideration of reporting under Serious Incident Reporting Procedure.</p> <p>Incident report for Trustee Board required.</p>
<p>High risk</p>	<ul style="list-style-type: none"> • Threshold for Significant harm met; and/or • Response not in line with policy and procedures; and/or • Risk of reputational damage/loss of trust for Stonewall <p>Immediate escalation to Safeguarding Advisory Committee.</p> <p>Incident report for Safeguarding Advisory Committee required.</p>
<p>Moderate risk</p>	<ul style="list-style-type: none"> • Threshold for external referral met. Incident response appropriate. <p>Actioned by Designated Safeguarding Lead.</p> <p>Reported to Safeguarding Advisory Committee in line with Quarterly cycle and included in Safeguarding Metrics to the Board.</p>
<p>Low risk</p>	<ul style="list-style-type: none"> • Threshold for external referral not met. Concern documented and appropriate signposting to support services provided if necessary. Incident response appropriate. <p>Actioned by Designated Safeguarding Lead.</p>

	Reported to Safeguarding Advisory Committee in line with Quarterly cycle.
Insufficient information for risk evaluation	Themes reported to Safeguarding Advisory Committee in line with Quarterly cycle

Any serious incident reports to the Charity Regulators must be reviewed and approved by the board of trustees in accordance with Stonewall’s Serious Incident Reporting policy.

We will also report incidents to other regulatory bodies and government departments or donors, where appropriate. In the case of programmes funded by the Foreign, Commonwealth and Development Office (‘**FCDO**’), this may include reporting to FCDO’s Fraud and Safeguarding Investigation Team at reportingconcerns@fcdo.gov.uk or by calling +44(0)1355 843747².

8. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared only on the basis that it is necessary, proportionate, relevant, accurate, timely and secure.

A record should be kept of what has been shared, with whom and for what purpose.

9. Connected policies and procedures

The following Stonewall policies and procedures relate to contexts in which safeguarding incidents may arise. These policies may need to be consulted in relation to a particular safeguarding concern, as is relevant in the circumstances:

- [Safeguarding at Stonewall Overarching Policy \(global\) *new December 2020*](#)
- [Safeguarding at Stonewall: Safer Recruitment *revised December 2020*](#)
- [Safeguarding at Stonewall: Managing Allegations *revised December 2020*](#)
- [Code of Conduct for working with Children and Adults at Risk *revised December 2020*](#)
- [Photography and Image Capture, storage and Sharing Policy](#)
- [Informal conflict resolution and formal grievance policy](#)
- [Whistleblowing](#)
- [Health and Safety Policy](#)
- [Data Protection Policies](#)
- [Complaints Policy](#)
- [Equity Diversity and Inclusion Policy *revised December 2020*](#)
- [Serious Incident Reporting Policy *new December 2020*](#)

² Refer to the relevant grant agreement in place with the FCDO to confirm what steps must be taken.

Policies and procedures in development for completion by December 2021:

- Code of Conduct: relationships at work
- Safeguarding Management Strategy
- Safeguarding Management Policy
- Risk Assessment policy and procedure
- Volunteering Management Policy
- Partnership Policy
- Dignity at Work Policy
- Staff Safety at work Policy

10 Policy Publication and Review

These procedures were adopted by Stonewall’s board of trustees in **[December 2020]**.

We review our safeguarding policy and procedures every year. They will be reviewed more frequently if required as a result of legal, policy or guidance changes, changes in the nature or mode of delivery, or as a result of any learning from safeguarding incidents in line with the [Charity Commission \(England and Wales\)](#) and [Office of the Scottish Charity Regulator](#) guidance.

Stonewall will ensure that this policy is at all times publicly accessible on its website. Stonewall will also seek to ensure that this policy is readily accessible for staff on our intranet.

Date Approved	16/12/20
Next Review	16/12/21
Approving Body	Trustee Board
Lead Staff Member	Designated Safeguarding Lead
Lead Trustee (where relevant)	Safeguarding Lead Trustee

Appendix 1 Key Contacts

Staff member needing advice on a safeguarding issue?

For Cymru related concerns, contact **Iestyn Wyn**

For Scotland related concerns, contact **Caroline Gillwood**

For Global related concerns, contact **Leanne MacMillan**

For all other concerns contact **Mo Wiltshire**, or **Sidonie Bertrand-Shelton**

If in doubt contact safeguarding@stonewall.org.uk. For urgent advice ring **07719 990134**.

Member of the public needing advice on a safeguarding concern?

For events – contact **Safeguarding Officer** for the event

All other contacts – your **Safeguarding Officer** (table below)

If Safeguarding Officer unavailable – safeguarding@stonewall.org.uk / **07719990134**.

<p>Safeguarding Lead Trustee</p> <p><i>To be contacted for concerns where the DSL is conflicted.</i></p>	<p>Simon Blake (he/him)</p>
<p>Chief Executive</p> <p><i>To be contacted for concerns where the DSL is conflicted.</i></p>	<p>Nancy Kelley (she/her)</p>

Stonewall Designated Safeguarding Lead (DSL)	Mo Wiltshire (she/her)
Deputy Designated Safeguarding Lead and Education & Youth Safeguarding Officer <i>To be contacted in the absence of the DSL</i>	Sidonie Bertrand Shelton (she/her)
Cymru Safeguarding Lead	Iestyn Wyn (he/him)
Scotland Safeguarding Lead	Caroline Gillwood (she/her)
Global Safeguarding Lead	Leanne MacMillan (she/her)
Research & Policy Safeguarding Officer	Eloise Stonborough (she/her)
FOPs Safeguarding Officer	Sandy Smith (she/her)
People and Development Safeguarding Officer	Laura Mayes (she/her)
Communications & Campaigns Safeguarding Officer	Robbie de Santos (he/him)
Community Engagement Safeguarding Officer	Maria Munir (they/them)
Trans Engagement Safeguarding Officer	Kirrin Medcalf (they/them and he/him)
Info Service Safeguarding Officer	Kara Bird (she/her)
Empowerment Safeguarding Officer	Sarah Campbell (she/her) and Ash Brook (she/her)
Workplace Safeguarding Officers	Emma Kosmin (she/her)
Fundraising Safeguarding Officer	Kimberley Mitchell (she/her)

Safeguarding Leads have access to the Safeguarding@stonewall.org.uk inbox for reporting safeguarding concerns. This should be your first point of contact for safeguarding concerns.

External support for Safeguarding Leads

NSPCC Helpline	24-hour helpline for advice on child protection matters for professionals and adults	0808 800 5000
ChildLine	24-hour helpline for children and young people	0800 1111
Whistle blowing advice line (external)	Advice can be sought from NSPCC if the Stonewall whistleblowing procedure has not resolved the concern	0800 028 0285
The UK Safer Internet Centre	Provides advice for professionals and responds to reports about sexual abuse images of children online	0844 381 4772
Child Exploitation and Online Protection Centre (CEOP)	Investigates inappropriate online behavior, such as grooming online or sexual exploitation	0870 000 3344
Internet Watch Foundation	Removes images of child sexual abuse content and criminally obscene content online	01223 203030
Disclosure and Barring Service (DBS)	Advice line for criminal records checks	03000 200 190
Local authority Children's Social Care (England)	Use the following website to find out the details: https://www.gov.uk/report-child-abuse-to-local-council	
Local authority Adults Social Care (England)	Use the following website to find out the details: https://www.gov.uk/report-abuse-of-older-person	
Local Authorities Scotland	http://www.gov.scot/Topics/Government/local-government/localg/usefullinks	
Welsh Local Authorities	http://wlga.wales/welsh-local-authority-links	
Northern Ireland	https://www.safeguardingni.org/	

Appendix 2: Safeguarding for Children and Adults at Risk Definitions

A child

As stated in the Children Acts 1989 and 2004, a child is anyone who has not yet reached their 18th birthday. In this document, 'children' is taken to include young people up to 18.

The fact that a young person has reached the age of 16, is living independently or is in further education, does not change their entitlement to protection.

Adults at risk

Any person who is aged 18 years or over and who is 'at risk of abuse or neglect because of their needs for care and support' (Care Act 2014 [England]). While some organisations use the term 'vulnerable adults', Stonewall uses the term 'adults at risk' to focus attention on the risks that people face, rather than any inherent vulnerability. This language is also in line with the terminology used in the Care Act 2014.

Abuse

A form of maltreatment of a child or adult. Somebody may abuse or neglect a child or adult by inflicting harm, or by failing to act to prevent harm. Children or adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. They may be abused offline, online or a combination of both.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment.
- Preventing impairment of children's 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 life chances.

Child or adult protection

This is part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children or adults who are suffering, or at risk of suffering, significant harm. Different types of abuse may constitute significant harm.

Significant harm

Ill-treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child).

Abuse and neglect

Forms of maltreatment of a child or adults at risk. Somebody may abuse or neglect a child or adults at risk by inflicting harm, or by failing to act to prevent harm. Children or adults may be abused in family or in an institutional or community setting by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or by another child or children. Anyone, regardless of gender, can be involved in the abuse of children and adults at risk.

Type of abuse

There are a number of different types of abuse, although in reality more than one type of abuse may be occurring simultaneously or sequentially. See **Guidance on Abuse** [\[add link\]](#).

Non recent historic allegations of abuse

Any disclosure or concerns that relate to abuse that happened more than a year ago, whether involving anyone working at the Stonewall or outside of it, must still be taken seriously and acted upon in line with the procedures outlined in **Responding, recording and reporting concerns and disclosure**. [\[add link\]](#)

Often victims of abuse take many years to come forward due to shame and a fear of being disbelieved. However, the alleged perpetrator may remain a risk to others and therefore all non-recent historic allegations have to be examined. Stonewall will report such cases and concerns to the local authorities and/or the police.

Additional vulnerabilities including safeguarding children with Special Educational Needs and Disabilities

Some groups of children are particularly vulnerable to abuse, either due to impairment and/or life experiences. For example, research shows that disabled children are more likely to be a target for abuse. Equally, children who are in the looked after system, or those that have already experienced harm, may be more vulnerable.

Local Safeguarding Children's Board (LSCB) and Local Safeguarding Adult Board (LSAB)

In England and Wales LSCB and LSAB are multi-agency bodies set up to coordinate local work to safeguard and promote the welfare of children (LSCB) and adults (LSAB). They also act to ensure the effectiveness of what the member organisations do individually and together in every local authority.

Child Protection Committee (CPC) and Adult Protection Committee (APC)

In Scotland, CPC and APC are the equivalent of LSCB and LSAB. They are responsible for child protection policy, procedure, guidance and practice (CPC) and adult protection (APC)

at the local authority level, ensuring different local agencies work together.

Disclosure and Barring Service UK

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

Disclosure Scotland and Access NI similarly carry out criminal record checks in Scotland and Northern Ireland respectively. Enhanced disclosures for work with children are carried out under the Scottish Protecting Vulnerable Groups Scheme (PVG) and Access NI scheme.

Positions of trust

'Position of trust' is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. Examples of positions of trust include: teachers, care workers, youth justice workers, social workers and doctors.

It's against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over).

Appendix 3 Safeguarding at Stonewall: roles & responsibilities

December 2020

Purpose and scope

All Stonewall staff have a responsibility to identify and share safeguarding concerns, but some staff and trustees hold additional responsibilities for safeguarding at strategic and organisational level. This policy defines these roles.

The role of trustees:

The Board of Trustees is responsible for safeguarding scrutiny and oversight across Stonewall. The Board will support the Chief Executive and Designated Safeguarding Lead in making strategic and operational decisions relating to risk management and safeguarding good practice with regards to children, adults at risk and all who work with Stonewall. They will do this by:

- Fostering a culture and environment in which all those who work with Stonewall and engage in Stonewall activities are able to raise concerns and understand their safeguarding responsibilities.
- Ensuring that appropriate policies, procedures and support are in place so that:
 - people are suitable to act in their roles;
 - all those who work with Stonewall know how to recognise and record concerns; and
 - there is a clear system of referring or reporting safeguarding concerns and disclosures.
- Ensuring that there is ongoing monitoring and oversight to ensure that the safeguarding policies are being implemented and that effective controls are in place.
- Monitoring compliance with the Stonewall Safeguarding Training Plan.
- Ensuring that Stonewall meets the requirements of its insurers regarding its safeguarding responsibilities.
- Nominating a Safeguarding Lead Trustee on the Board whose role is one of scrutiny, and to support the Safeguarding Leads in assessing and managing safeguarding risks where identified.

The role of the Safeguarding Advisory Committee

The Safeguarding Advisory Committee sits as a subcommittee of Stonewall's Remuneration Committee. Its standing membership is the Lead Trustee for Safeguarding, Designated

Safeguarding Lead, Director of People and Development, and Chief Executive. The Committee will meet on a quarterly basis, reporting into Remuneration Committee. It is responsible for:

- Reviewing data relating to safeguarding concerns, identifying opportunities to improve safeguarding practice, and making recommendations to the Senior Leadership Team and/or Board as appropriate.
- Developing and monitoring the Safeguarding Management Strategy.
- Approving and reviewing safeguarding policies and procedures for recommendation to the Board.

The role of the Designated Safeguarding Lead

The Director of Education and Youth is the Designated Safeguarding Lead for Stonewall, and is the accountable member of the Executive Leadership Team.

They are accountable for:

- Ensuring compliance with Stonewall's safeguarding policies and procedures in order to safeguard children and adults at risk.
- Reporting to the Board of Trustees on relevant safeguarding matters.
- Promoting a culture and environment whereby all those who work with Stonewall and engage in Stonewall activities are able to raise concerns and understand their safeguarding responsibilities.
- Ensuring that appropriate policies, training and support are in place to so that people are suitable to act in their roles. Ensuring that all those who work with Stonewall know to recognise and record concerns, and that there is a clear system of referring or reporting safeguarding concerns and disclosures.
- Ensuring that there is ongoing monitoring and review of safeguarding implementation at Stonewall, and building a culture of learning and improvement in safeguarding practice.
- Ensuring communication of lessons learned throughout Stonewall and implementing partners, with the ultimate objective of preventing reoccurrence of any safeguarding incidents.
- Communicating any changes in policy and procedures to staff.

The role of Local Safeguarding Leads

Local Safeguarding Leads are responsible for safeguarding issues at a national and global level, supporting staff and volunteers and reporting to the Designated Safeguarding Lead (DSL). They are responsible for:

- Supporting the DSL in line with Stonewall's Safeguarding whenever concerns arise about a child or adult at risk, so that a decision can be made as to what action to take.
- Being aware of the relevant government guidance on safeguarding.
- Being aware of local risk assessment where appropriate.
- Acting as a Safeguarding Officer for their team (see below).

The role of Safeguarding Officers

Safeguarding Officers are responsible for:

- Supporting staff and volunteers to complete the **safeguarding concern form [link] and safeguarding action logs [link]** in an accurate and timely way.
- Championing safeguarding in their department, and signposting staff and volunteers to Stonewall safeguarding policies.
- Acting as first point of contact for staff or volunteers who have safeguarding concerns or receive safeguarding disclosures.
- Sharing the learnings that we take from reviewing our safeguarding concerns and disclosures through our safeguarding officers' quarterly meetings. This will allow us to continuously strengthen our safeguarding practice at Stonewall.
- Holding the team-specific element of our Safeguarding quarterly inductions for new starters within teams, so that they are aware of how our safeguarding policies are implemented in each team.

Expectations of contractors and partners

We expect all contractors and partners to work in accordance with the Stonewall safeguarding policy unless a bespoke safeguarding procedure is agreed.

Safeguarding must be explored as part of the partnership agreement process and reflected in our contracting. There are three scenarios which are considered acceptable:

- The contractor or partner agrees to follow Stonewall's safeguarding policy, and this is included in the contractual agreement as part of the terms and conditions.
- The contractor or partner has their own safeguarding policy and procedure which has been reviewed and approved by the Stonewall Designated Safeguarding Lead.
- Stonewall, working with the contractor or partner, develops a bespoke safeguarding policy to meet the needs of the specific engagement or programme. This will be reviewed and agreed by the Designated Safeguarding Lead.

Advice on whether a DBS check (or equivalent) is required for a contractor should be sought from the DSL. Where required, the DBS check (or equivalent) should be sought by the contractor's organisation and Stonewall will request confirmation from the contractor's organisation that all necessary checks have been completed to a satisfactory standard.

Third Party Hirers

All parties/persons hiring Stonewall premises will be expected to adhere to Stonewall's safeguarding policy and will be notified of them. This will be reflected in any contractual agreements/terms and conditions as part of the hiring arrangements.

These procedures were adopted by Stonewall's board of trustees in **[December 2020]**.

We review our safeguarding policy and procedures every year. They will be reviewed more frequently if required as a result of legal, policy or guidance changes, changes in the nature or mode of delivery, or as a result of any learning from safeguarding incidents in line with the [Charity Commission \(England and Wales\)](#) and [Office of the Scottish Charity Regulator](#) guidance.

Stonewall will ensure that this policy is at all times publicly accessible on its website. Stonewall will also seek to ensure that this policy is readily accessible for staff on our intranet.

Date Approved	16/12/20
Next Review	16/12/21
Approving Body	Trustee Board
Lead Staff Member	Designated Safeguarding Lead
Lead Trustee (where relevant)	Safeguarding Lead Trustee

¹ <https://www.legislation.gov.uk/ukpga/1989/41/contents>