UKRAINE CHARITY

SAFEGUARDING POLICY

1. Purpose

Ukraine Charity (hereafter referred to as the **"Charity"**) is committed to protecting people from harm and to maintaining an environment in which safeguarding concerns can be raised, taken seriously and responded to appropriately.

The Charity primarily raises funds in the United Kingdom to support charitable projects in Ukraine and/or the United Kingdom, working with partner organisations to deliver this support.

It is committed to protecting people who may be affected by its activities or by the projects it supports, including trustees, volunteers, contractors, beneficiaries and, where relevant, other people who come into contact with the Charity through its work.

The Charity does not provide services directly to beneficiaries. Safeguarding risks therefore arise principally from the projects it supports, the partner organisations with which it works, and activities carried out by the Charity.

The Charity's safeguarding responsibilities are addressed through two complementary areas:

Externally: through appropriate and proportionate due diligence of partner organisations, appropriate arrangements governing the support provided, and monitoring of safeguarding arrangements in projects supported by the Charity.

Internally: through appropriate recruitment and vetting, clear standards of conduct, and accessible reporting arrangements with appropriate confidentiality to promote the safety and wellbeing of the Charity's trustees, volunteers and contractors.

2. Scope

This policy applies to:

- trustees;
- volunteers;
- contractors engaged by the Charity;
- employees;
- other individuals or organisations supporting the Charity, where relevant; and
- partner organisations and individuals involved in delivering projects supported by the Charity, where relevant.

The policy applies to activities carried out in the United Kingdom and to projects or activities funded by the Charity overseas.

3. Definitions

For the purposes of this policy:

"**contractor**" means an individual or legal entity engaged by the Charity to provide services to the Charity.

"**partner organisation**" means an organisation that works with or receives financial or other forms of support from the Charity to deliver charitable projects or activities in Ukraine and/or the United Kingdom.

4. Safeguarding

For the purposes of this policy, "**safeguarding**" means taking reasonable and proportionate steps to prevent and respond to abuse, exploitation, neglect, harassment, bullying and other forms of harm.

Depending on the circumstances, this may include:

- physical or emotional abuse;
- sexual abuse, exploitation or harassment;
- abuse of power or position of trust;
- bullying or harassment;
- discrimination;
- exploitation or neglect;
- inappropriate behaviour towards children or adults at risk;
- unsafe recruitment or supervision;
- risks associated with online communications, photographs or personal information;
- other conduct that places a person at risk of harm.

The Charity recognises that some supported projects may present higher safeguarding risks, particularly where they involve children, disabled people or adults at risk.

5. Safeguarding Principles

The Charity will:

1. put the safety and wellbeing of people at the centre of its safeguarding approach;
2. identify and assess safeguarding risks arising from its own activities and from the projects it supports;
3. carry out appropriate and proportionate due diligence on partner organisations and, where relevant, on the safeguarding risks associated with individual projects;

4. take reasonable and proportionate steps to reduce identified safeguarding risks;
5. ensure that concerns can be reported safely and are treated seriously;
6. respond promptly and appropriately to safeguarding concerns and incidents;
7. maintain appropriate confidentiality while sharing information where necessary to protect people or comply with legal or regulatory requirements;
8. include appropriate safeguarding requirements, where appropriate, in relevant arrangements governing support provided to partner organisations;
9. monitor safeguarding arrangements in supported projects, proportionate to the level of risk; and
10. review safeguarding arrangements regularly and following significant incidents, concerns or material changes in the Charity's activities.

6. Responsibilities of the Board of Trustees

The Board of Trustees has overall responsibility for safeguarding within the Charity.

The trustees will:

- approve and review this policy;
- ensure that safeguarding risks are identified and included within the Charity's risk management arrangements;
- ensure appropriate safeguarding procedures are in place and proportionate to the Charity's activities and identified risks;
- ensure trustees, volunteers, contractor and employees are suitable for their roles;
- ensure that appropriate checks are undertaken for trustees, volunteers, employees and contractors, where required or appropriate to their roles;
- ensure appropriate due diligence is carried out on partner organisations;
- ensure appropriate safeguarding requirements, where appropriate, are included in relevant arrangements with partner organisations;
- monitor significant safeguarding concerns and incidents; and
- ensure serious incidents are reported to the Charity Commission or other relevant authorities where required.

Responsibilities may be delegated to the Safeguarding Lead, but the Board of Trustees retains overall responsibility for safeguarding.

7. Safeguarding Lead

The Board of Trustees will appoint a trustee as the **Safeguarding Lead**, who will have oversight of safeguarding on behalf of the Board of Trustees and will act as the main point of contact for safeguarding concerns.

The Safeguarding Lead will:

- be the main point of contact for safeguarding concerns;
- maintain appropriate safeguarding records;
- advise on safeguarding matters;
- coordinate the Charity's response to safeguarding concerns;
- liaise with partner organisations where appropriate;
- consider whether concerns should be referred to relevant authorities;
- consider whether an incident should be reported to the Charity Commission;
- ensure that relevant safeguarding risks and lessons learned are brought to the attention of the Board of Trustees; and
- ensure that the Charity's safeguarding arrangements remain appropriate to its activities.

Where the Safeguarding Lead has a conflict of interest in a particular matter, another trustee will take responsibility for handling that matter.

8. Working with Partner Organisations

The Charity will carry out appropriate and proportionate due diligence on partner organisations before providing support. The nature and extent of the due diligence will reflect the risks associated with the partner organisation and the project.

Depending on the circumstances, this may include checking:

- the identity and legal status of the partner organisation;
- governance and management arrangements;
- relevant experience and capacity;
- financial and operational controls;
- appropriate safeguarding policies, procedures and reporting arrangements, including clear responsibility for safeguarding within the partner organisation;
- recruitment and vetting practices where relevant;
- previous safeguarding concerns or significant incidents where relevant; and
- any other information necessary to assess the partner organisation's suitability.

Projects involving children, disabled people, adults at risk or other higher-risk groups will be subject to enhanced safeguarding due diligence where appropriate.

9. Agreements with Partner Organisations

Where appropriate, the Charity will use a memorandum of understanding, grant agreement or partnership agreement to set out:

- the purpose and permitted use of the grant;
- the responsibilities of the partner organisation;
- safeguarding requirements appropriate to the project;
- reporting obligations;
- monitoring arrangements;
- the requirement to notify the Charity of serious safeguarding concerns or incidents;
- circumstances in which the Charity may suspend or terminate funding; and
- any other conditions necessary to protect people and the Charity.

The level of contractual requirements will be proportionate to the risks associated with the project.

10. Projects Involving Children or Adults at Risk

Where a funded project involves children or adults at risk, the Charity will assess the additional safeguarding risks before approving or renewing funding.

Depending on the nature and risk of the project, the Charity may require the partner organisation to demonstrate that it has appropriate safeguarding arrangements, including arrangements for recruitment and vetting, supervision, conduct, reporting and responding to concerns, and any other project-specific safeguarding risks.

The partner organisation is responsible for the day-to-day safeguarding of people involved in its projects and for maintaining appropriate safeguarding arrangements.

11. Protection of People Involved with the Charity

The Charity recognises its responsibility to protect those involved in or supporting its work, including trustees, volunteers, employees and contractors, from harm arising from their involvement with the Charity.

The Charity will take reasonable and proportionate steps to:

- provide appropriate information and guidance;
- ensure those involved in the Charity's work know how to raise concerns;
- manage unreasonable or inappropriate behaviour;
- address bullying or harassment;
- maintain appropriate professional boundaries;

- provide appropriate support following a safeguarding concern or incident.

The Charity does not tolerate bullying, harassment, abuse, exploitation or discriminatory behaviour. All persons acting on behalf of or supporting the Charity are expected to maintain and comply with appropriate standards of conduct and relevant policies and procedures.

12. Recruitment, Appointment and Vetting

The Charity will take reasonable and proportionate steps to ensure that trustees, volunteers and contractors are suitable to undertake their roles.

Depending on the role, this may include:

- an application or expression of interest;
- an appropriate interview or discussion;
- references;
- identity checks;
- checks relating to eligibility to act as a trustee, where applicable;
- DBS or other appropriate checks where the role is eligible and such checks are considered appropriate; and
- other checks appropriate to the role.

The Charity will not require DBS checks automatically for all trustees, volunteers, employees or contractors. Roles will be assessed according to their responsibilities, activities and safeguarding risks.

Any personal information obtained through recruitment or vetting will be handled securely and in accordance with applicable data protection requirements.

13. Code of Conduct

Trustees, volunteers, employees and contractors are expected to behave in a manner that protects others and reflects the values of the Charity.

They must:

- treat others with dignity and respect;
- maintain appropriate boundaries;
- not abuse their position of trust or authority;
- avoid behaviour that could place another person at risk of harm;
- report safeguarding concerns promptly;
- maintain appropriate confidentiality; and
- comply with the Charity's policies and procedures.

The Charity may require partner organisations to comply with appropriate standards of conduct relevant to their work.

14. Raising a Safeguarding Concern or Incident

Anyone who has a safeguarding concern or becomes aware of a safeguarding incident connected with the Charity or a project it supports should report it as soon as possible to the Safeguarding Lead.

A concern or an incident may relate to:

- something that has happened within the Charity;
- the behaviour of a trustee, volunteer, employee or contractor;
- the conduct of a partner organisation or its staff or volunteers;
- an incident involving a beneficiary of a funded project; or
- any other conduct suggesting that a person may be at risk of harm.

A person reporting a concern does not need to prove that abuse or harm has occurred. They should provide the information they have and explain why they are concerned.

If someone is in immediate danger, appropriate emergency or law-enforcement services should be notified without delay.

Where a safeguarding concern or incident relates to the Safeguarding Lead, it should be reported to another trustee. The Safeguarding Lead must not be responsible for assessing or managing a concern or incident in which they are personally involved.

A safeguarding concern relating to a project delivered by a partner organisation may be reported directly to the Charity's Safeguarding Lead. The Charity will assess the concern and, where appropriate, liaise with the partner organisation to ensure that it is addressed in accordance with the partner organisation's safeguarding arrangements and the terms of the Charity's agreement with the partner organisation. The Charity will consider whether any further action or external referral is required.

15. Responding to Safeguarding Concerns and Incidents

Safeguarding concerns and incidents will be taken seriously and responded to promptly and proportionately. The Safeguarding Lead will coordinate the Charity's response on behalf of the Board of Trustees and will:

- assess the concern or incident and any immediate risk of harm;
- ensure that it is recorded appropriately;
- determine what action is required and whether the matter should be referred to an appropriate authority;
- liaise with the relevant partner organisation where appropriate;

- consider whether the incident should be reported to the Charity Commission or another relevant authority; and
- ensure that appropriate follow-up action is taken and recorded.

The Board of Trustees retains overall responsibility for safeguarding and for decisions concerning significant incidents and any required reporting to the Charity Commission.

Where a concern or incident relates to a project delivered by a partner organisation, the partner organisation is responsible for taking appropriate action in relation to people directly involved in its activities. The Charity will oversee the partner organisation's response to the extent necessary to meet its own safeguarding responsibilities and the terms of its agreement with the partner organisation.

16. Whistleblowing

The Charity encourages trustees, volunteers, employees and contractors to raise serious concerns about wrongdoing, misconduct, serious breaches of law or Charity policy, abuse of power, fraud, corruption or other matters that may cause serious harm to people, the Charity or its assets.

The Charity will take concerns seriously and will ensure that they are considered appropriately and confidentially. No person should suffer retaliation for raising a genuine concern in good faith.

Concerns relating to safeguarding will be handled in accordance with the Charity's safeguarding procedures.

Concerns should normally be raised with the Safeguarding Lead or another trustee. Where the concern relates to the Safeguarding Lead, it should be raised with another trustee. Where the concern relates to the Board of Trustees or an individual trustee, the matter should be escalated in accordance with the Charity's Whistleblowing Procedure.

17. Confidentiality and record keeping

Safeguarding concerns and related information will be treated sensitively and kept confidential.

Information will only be shared with those who need it for safeguarding, legal, regulatory or other legitimate purposes.

Records of safeguarding concerns, decisions and actions will be stored securely and retained in accordance with the Charity's data protection and records-management arrangements.

18. Training and awareness

Trustees, contractors, employees and volunteers will receive information appropriate to their roles so that they understand:

- the Charity's safeguarding responsibilities;

- how to recognise and report safeguarding concerns;
- their responsibilities under this policy; and
- how to maintain appropriate boundaries and protect themselves and others.

Additional safeguarding training will be provided where the nature of a role or project makes it appropriate.

The Safeguarding Lead will receive appropriate safeguarding training for the role.

18. Monitoring and review

Safeguarding will form part of the Charity's overall risk management and governance arrangements.

The Board of Trustees will periodically review:

- safeguarding risks;
- significant concerns and incidents;
- partner organisation safeguarding arrangements;
- whether existing policies and procedures remain appropriate; and
- whether additional measures are required following changes in the Charity's activities or operating environment.

This policy will be reviewed at least annually and following any serious safeguarding incident or significant change in the Charity's activities.

19. Related policies and procedures

This policy should be read together with other policies and procedures approved by the Charity.

20. Policy approval

This policy was approved by the Board of Trustees of Ukraine Charity.

For are any safeguarding matters and enquiries please contact Ukraine Charity Safeguarding Lead, Artem Shyrkozhukhov at ideas@ukrainecharity.org