

# Safeguarding policy

<b>Reference number</b>	<b>Version 1</b>	<b>Status</b> <b>Live</b>	<b>Sponsor(s)/author(s)</b> Infrastructure Management Team
<b>Approving body</b>	HQIP Board of Trustees		
<b>Approval date</b>	22 <sup>nd</sup> March 2024		
<b>Date of issue</b>	April 2024		
<b>Review date</b>	March 2026		

<b>Policy statement .....</b>	<b>3</b>
<b>Introduction.....</b>	<b>3</b>
<b>Commitments to safeguarding.....</b>	<b>3</b>
<b>Our roles and responsibilities .....</b>	<b>4</b>
<b>Contacts: Safeguarding Leads.....</b>	<b>5</b>
<b>Safe people - recruitment .....</b>	<b>6</b>
<b>Code of conduct.....</b>	<b>Error! Bookmark not defined.</b>
<b>How to raise a safeguarding concern with HQIP.....</b>	<b>7</b>
<b>Confidentiality .....</b>	<b>9</b>
<b>Complaints.....</b>	<b>9</b>
<b>Definitions .....</b>	<b>10</b>
<b>Legal context and useful resources .....</b>	<b>14</b>

# Policy statement

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

## Introduction

This policy sets out Healthcare Quality improvement Partnership's (HQIP) approach to safeguarding.

Given the nature of our work as a charitable organisation, we do not usually have direct contact with those who benefit from our work. However, we have a responsibility to protect our staff and Trustees as well as others who we interact with during the course of our work. This policy reflects relevant legislation and statutory guidance. It must be followed by HQIP staff (employees and contracted workers) and Trustees.

We expect all organisations that we contract to have their own safeguarding policy and procedures in place and to ensure these are followed or, in exceptional circumstances, to accept and adhere to the HQIP's policy and procedures if they do not have their own. We will make them aware of the HQIP's policy and the expectations that we have in relation to safeguarding.

This policy sits alongside the Whistleblowing policy, Equity, Diversity and Inclusion (EDI) policy, Dignity at Work policy, which also includes approach to bullying and harassment, Grievance policy and Disciplinary policy.

Full definitions of terms used in this policy are set out in [Definitions](#), below.

## Commitments to safeguarding

We have six policy commitments to safeguarding:

### A safe and trusted culture

We promote a safe and trusted culture that prioritises safeguarding by ensuring HQIP have appropriate safeguarding mechanisms in place and take all safeguarding concerns seriously.

## **Responsibility**

We take responsibility. Safeguarding is everyone's responsibility. Every individual working for HQIP has a role to play in keeping people safe.

## **Safety in recruitment**

We recruit safely. We have specific procedures in place to select and carry out appropriate vetting for new staff and Trustees.

## **A prompt response**

We respond promptly to every safeguarding concern. All safeguarding concerns are dealt with in accordance with our safeguarding procedures.

## **Respect, care and dignity for survivors of abuse**

We treat survivors of abuse and other safeguarding concerns with respect, care and dignity. Those raising a concern and – if different – the person to whom the concern relates, will receive a compassionate response, be listened to and be taken seriously.

## **Continuous improvement**

We encourage a culture of learning to continuously improve our approach to safeguarding. We are committed to doing the right thing, being accountable for our actions and learning from incidents and near misses.

## **Our roles and responsibilities**

Everyone at HQIP has a responsibility for safeguarding and must:

- Familiarise themselves with this policy and the procedures that support it.
- Implement the safeguarding measures contained in this policy and ensure their behaviour always reflects the principles and practices set out in this policy.
- Know what to do if they have a safeguarding concern, take all concerns seriously and follow HQIP procedures after a safeguarding concern has been raised.

## **Trustees**

Our Trustees have a duty of care to HQIP, which includes ensuring all reasonable steps are taken to safeguard people from abuse, managing risk and protecting the reputation of HQIP.

The Trustees may delegate the day to day work for safeguarding to the positions below but they retain ultimately responsible for safeguarding within HQIP.

Our Trustees are responsible for:

- Approving HQIP's Safeguarding policy and overseeing its implementation and effectiveness and ensuring this is reviewed every three years.
- Ensuring HQIP is compliant with Charity Commission regulations and that all serious incidents are reported to the Charity Commission.
- Ensuring internal reviews are conducted following all safeguarding incidents and the learnings are reviewed by the CORE Team.
- Appointing a trustee responsible for Safeguarding and the staff Safeguarding leads.

## Leadership Team

The Chief Executive Officer (CEO) is accountable to the Board of Trustees for all safeguarding matters. The CEO will ensure that safeguarding underpins all decisions made by the Leadership Team by:

- Maintaining a clear organisational and operational focus on safeguarding staff, adults with support or care needs and children.
- Making sure relevant statutory requirements and other national standards are met.

## Contacts: Safeguarding Leads

Our Safeguarding Leads are the Director Operations for Corporate Services (DOCS), the Executive Assistant Infrastructure Manager (EAIM) and Peter Bloomfield, Trustee:

- Safeguarding Lead: Anna Kisielewska, EAIM [Anna.Kisielewska@hqip.org.uk](mailto:Anna.Kisielewska@hqip.org.uk)
- Director responsible for Safeguarding: Glenn Hearnden, DOCS  
[Glenn.Hearnden@hqip.org.uk](mailto:Glenn.Hearnden@hqip.org.uk)
- Trustee responsible for Safeguarding, Peter Bloomfield  
[peter.bloomfield@macularsociety.org](mailto:peter.bloomfield@macularsociety.org)

The Safeguarding Leads, with the support of the ELT, are responsible for ensuring the implementation of the safeguarding policy and ensuring staff are supported to fulfil their responsibilities. This includes:

- Monitoring of policy implementation to ensure consistency and compliance.
- Acting as the first point of contact for concerns and providing advice and support to staff.
- Ensuring staff are made aware of their safeguarding responsibilities.

- Ensuring that HQIP safeguarding policy is reviewed every three years.
- The Executive Safeguarding Lead is accountable to the CEO.

## Safe people - recruitment

HQIP takes recruitment of its staff seriously to ensure we recruit safely so we don't put candidates or colleagues at risk of abuse.

- All employees go through a robust recruitment process including at least one interview and references are sought for all successful candidates.
- We conduct, through an independent provider, basic DBS checks for those staff who are deemed public, patients, volunteers facing. See the Recruitment Policy.
- When developing new roles, we consider the level of contact and potential safeguarding risk and decide whether a DBS is required.
- We incorporate safeguarding into staff inductions to ensure that staff are aware of their responsibilities and how to report concerns.
- Our Safeguarding Leads are available to provide support and advice to staff. In addition, HQIP is a member of the Wellbeing Solutions Employee Assistance Programme which provides a range of resources to support staff.
- All employees are asked to confirm their right to work in the UK.

## HQIP Safeguarding Principles

At HQIP, safeguarding is paramount. We are committed to ensuring the safety and wellbeing of everyone we work with. Our Safeguarding Principles provide clear guidelines for all staff to follow, reflecting our commitment to ethical conduct and professional responsibility. Adherence to these principles is mandatory and integral to maintaining our standards of care and trust.

### 1. Commitment to Safety and Wellbeing

All staff members must prioritise the safety and wellbeing of every individual they interact with, ensuring that their actions or inactions do not cause harm or pose a risk.

### 2. Respect and Dignity

We shall treat everyone with respect, dignity, and consideration, acknowledging their rights, cultural beliefs, values, and individuality.

### 3. Professional Conduct

Staff must maintain the highest levels of professionalism. This includes appropriate boundaries, confidentiality, and avoiding conflicts of interest.

#### 4. Vigilance and Reporting

An obligation to be vigilant for signs of abuse or neglect, and a duty to report any concerns promptly and through the correct channels.

#### 5. Informed Decision-Making

Ensure that individuals are provided with clear, understandable information to make informed decisions about their care, respecting their autonomy.

#### 6. Continuous Learning and Improvement

Commit to ongoing learning and improvement in safeguarding practices, staying informed about current legislation, guidelines, and best practices through communication by the Safeguarding Team.

#### 7. Accountability and Transparency

Maintain a culture of accountability and transparency. All actions and decisions must withstand scrutiny and align with both organisational and legal standards.

#### 8. Collaborative Approach

Work collaboratively with colleagues, other organisations, and agencies to promote the safeguarding of individuals, sharing information appropriately and lawfully.

#### 9. Supportive Environment

Foster an environment where staff feel supported and confident to raise concerns, knowing these will be addressed seriously and sensitively.

#### 10. Zero Tolerance to Abuse

Adopt a zero-tolerance approach to any form of abuse or exploitation, be it physical, emotional, sexual, financial, or otherwise.

These principles are to be upheld by all staff within HQIP. Any breach of these principles is a matter of grave concern and will be addressed with the utmost seriousness, potentially resulting in disciplinary actions.

## **How to raise a safeguarding concern with HQIP**

Safeguarding concerns or allegations come to light from a wide variety of sources. HQIP staff as well as external stakeholders, such as members of the public, can raise a safeguarding concern related to HQIP's work or an organisation we contract with by emailing our Safeguarding Leads.

If your concern relates to the Safeguarding Lead you can ask to speak to our Executive Safeguarding Lead and vice versa.

## **What happens when HQIP receives information about a safeguarding concern?**

We ensure concerns are recorded appropriately and if (and to the extent) necessary, shared with relevant safeguarding colleagues and other statutory agencies, including the police. All our staff and Trustees co-operate fully with statutory authorities where applicable. We follow our safeguarding procedures which detail how concerns are managed and investigated.

It is important that even low-level safeguarding concerns are reported. Low level concerns may relate to poor practice, rather than abuse, but it is important that these issues are addressed as this can help prevent further, more serious concerns in the future. If you are unsure whether something constitutes a safeguarding concern, you must still raise this with the Safeguarding Lead. It is the responsibility of the Safeguarding Lead to determine whether information supplied is to be considered a safeguarding concern and to determine what action is required.

The Safeguarding Lead will make notes of the discussion. If they determine that the concern is a safeguarding issue, they will ask the person reporting the concern to complete the [safeguarding concern form](#) and send this by email to the Safeguarding Lead.

Ideally you should include the following information, although it is accepted this is not always possible:

- Basic details about the person affected by the concern, as far as it is known. This includes the person's name, address and contact details.
- If the person affected is a child, then details of parents/guardians should also be recorded. Similarly, if the person is an adult with care and support needs, details of carers should also be recorded.
- Basic details of the individual against whom the concern is perceived. This includes their name, relationship/role within their organisation and relationship to the person affected by the concern.
- Dates when the concern arose, or when the incident occurred.
- A description of the concern, wherever possible using the person's own words to describe the event or incident as this helps avoid assumptions about the intended meaning of the words used.



- Details of any action already taken about the concern.
- The views and wishes of the person affected about what action they would like taken, including whether the safeguarding concern should be passed to the statutory agency or not.

[The concern form](#) should be used to record information received in a consistent manner.

For concerns relating to HQIP's staff, an investigation will be carried out by the Safeguarding Lead, an HR representative and ELT as required. Further information is available in our [Safeguarding Procedures](#).

In cases of emergency, where a child or adult with care and support needs appears to be at immediate risk of harm, an urgent report must be made to the statutory agencies to ensure that no one is left in a dangerous situation pending intervention, in an emergency dial 999.

It is the responsibility of everyone within HQIP to ensure those who may need protection are not left at risk. Where an emergency referral to statutory agencies is made, you must notify HQIP's Safeguarding Lead as soon as possible, and provide details of:

- The rationale for the immediate communication to the statutory agency.
- People involved in the communication, their contact details and any reference numbers.
- Details of the discussion, any decisions and the outcome of the conversation.

## Confidentiality

All documentation relating to safeguarding incidents or allegations will be kept and treated confidentially and in accordance with UK GDPR the Data Protection Act 2018. Only those who need to know about the incident will be informed.

In order to keep people safe, information may need to be shared with others, both within HQIP and with external agencies. Where appropriate, we will seek consent to share such information (which may include special category personal data or other personal data, as defined under applicable data protection legislation). However, if we need to share this information and it is not possible to get consent, requesting such consent would put the individual at risk at further risk, or it would not be considered reasonable for us to seek consent in the circumstances, we may share this information without the consent of the individual concerned.

## Complaints

Any complaint about the way we have handled a safeguarding concern should be made in accordance with our [Complaints policy](#) will be addressed accordingly in a fair and thorough manner.

# Appendix 1

## Definitions

### Child

A child is defined as any person under the age of 18, whether living with their families, in state care or living independently. [Working Together to Safeguard Children 2018, p.7, updated Dec 2020]

### Safeguarding children

In England, protecting children at risk is defined as:

- Protecting children from abuse and 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 outcomes. [Working Together to Safeguard Children 2018]

### Adult with care and support needs

In England an adult with care and support needs is defined as a person aged 18 or over whom:

- Has needs for care and support (whether or not the local authority is meeting any of those needs); and
- Is experiencing, or 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. [Care Act 2004, section 42]

An adult with care and support needs could be a member of the public, someone contract with, or a member of staff. Whoever they are, any concerns should be shared in accordance with this policy.

## **Abuse**

Abuse is a form of mistreatment by one individual that causes harm to another person. The range of abuse includes physical abuse, emotional abuse, neglect, sexual abuse and child sexual exploitation.

## **Abuse and neglect of Children**

### **Physical abuse**

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be

used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## **Child sexual exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

## **Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a) provide adequate food, clothing and shelter (including exclusion from home or abandonment) b) protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Abuse and neglect of adults with care and support needs**

### **Physical abuse**

A form of abuse which may involve slapping, hitting, pushing, restraining, misuse of medication, restraint, being denied food or water, or not being helped to go to the bathroom when you need to.

### **Emotional abuse**

The persistent emotional maltreatment of an adult could include humiliating, blaming, controlling, intimidating, or harassing, verbal abuse, cyberbullying and isolation.

### **Sexual abuse**

This includes sexual activity with someone without their permission or sexual activity with someone who is not able to give their consent. Sexual activity includes indecent exposure,

sexual harassment, inappropriate touching or looking, sexual teasing or innuendo, sexual photography, being forced to watch pornography or sexual acts, being forced or pressured to take part in sexual acts and rape.

## **Exploitation**

Unfairly manipulating someone for profit or personal gain. This could be planned, or something done on the spur of the moment.

## **Financial or material abuse**

This could include theft, fraud, exploitation, coercion in relation to the person's financial affairs or arrangements, for example, getting someone to change their will.

## **Neglect**

For adults, neglect includes not being provided with enough food or with the right kind of food, or not being taken proper care of, being left without help to wash or change dirty or wet clothes, not getting to a doctor when needed or not making sure you have the right medicines.

## **Discriminatory abuse**

This includes discrimination on grounds of race, gender, gender identity, disability, sexual orientation, religion and other forms of harassment, slurs, or similar treatment.

## **Organisational abuse**

This includes neglect and poor care practice within an institution or specific care setting, for example, a hospital or care home, or care provided at home. This could be a one-off incident or on-going ill treatment and could be through neglect or poor professional practice.

## **Modern Slavery**

Human trafficking, forced labour, domestic servitude, debt bondage or sexual exploitation.

## **Domestic Violence or Abuse**

This includes assault, threats of violence, humiliation, intimidation, and harming, frightening, or punishing.

## **Self-neglect**

Lack of self-care, to the extent that this threatens the person's health or safety, inability to avoid self-harm, or failure to seek help.

## Appendix 2

# Legal context and useful resources

## Duties under charity law

HQIP is regulated by the Charity Commission for England and Wales. We have duties under the [Charities Act 2011](#) and our duties 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.

## 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

the [Children Act 1989](#) & [2004](#), the [Protection of Children Act 1999](#) and the [Safeguarding Vulnerable Groups Act 2006](#), [Working Together to Safeguard Children \(2018\)](#) and [Keeping Children Safe in Education \(2021\)](#), [The Counter-Terrorism and Security Act 2015](#), [Domestic Abuse Act 2021](#).

### Adults at Risk

[Care Act 2014](#) and the [Care and support statutory guidance \(2020\)](#) and [Mental Capacity Act 2005](#), [The Counter-Terrorism and Security Act 2015](#), [Domestic Abuse Act 2021](#).

## Useful safeguarding resources

[Wellbeing Solution](#) offers members access to resources and direct support. HQIP is a member and staff can access online services.

[NVCO](#) offer a range of safeguarding know-how guidance, training and links to national and local organisations who provide safeguarding support. Resources are aimed at voluntary organisations, small groups, organisations, and charities working in the UK.

[NSPCC](#) offer best practice guidance, policy templates, checklists, training as well as research and policy updates on safeguarding. Resources are aimed at a wider range of small organisations working with children in the UK.

[Ann Craft Trust](#) offers resources to assist organisations in safeguarding young people and adults at risk. Resources are aimed at a wider range of small organisations working with adults in the UK.

[Hourglass](#) offers information relating to the harm, abuse, and exploitation of older people in the 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.