



SAFEGUARDING AND CHILD PROTECTION POLICY

This Policy is reviewed regularly and/or in response to changes in legislation

Created	May 2007	Jill Kelham, Bursary Committee Chair
Reviewed	October 2021	Liz Woodcock, Executive Director Alice Higgins, Thomas's Foundation Administrator
Reviewed	November 2022	Susana White (Trustee) Bunmi Richards (Trustee) Mark Dearlove (Trustee) Liz Woodcock, Executive Director
Reviewed	October 2024	Vishal Oberoi (Trustee) Bunmi Richards (Trustee) Ros King (Trustee) Liz Woodcock, Executive Director

KEY CONTACTS

All concerns arising under this Safeguarding Policy and Child Protection Policy should be reported to either –

- The Designated Safeguarding Lead; and/or
- The Executive Director; and/or
- The Nominated Trustee
- In case of emergency or risk of immediate harm, the Statutory Services and/or the Police

Designated Safeguarding Lead

Thomas's Foundation has appointed a Designated Safeguarding Lead to be the primary contact person in respect of all matters connected with the Safeguarding and Child Protection Policy.

The Designated Safeguarding Lead contact details are as follows:

Name	Lucy van Straubenzee
Telephone (Business Hours)	020 3327 4177
Telephone (Weekend and non-Business Hours)	07531 577221
E-mail	lvansraubenzee@thomassfoundation.org.uk

Please record any concerns shared with the Designated Safeguarding Lead using the Thomas's Foundation [Reporting Form](#). A copy of the Reporting Form is included as [Annex One](#) to this policy.

Executive Director

If the Designated Safeguarding Lead is unavailable please contact the **Executive Director** by email to lwoodcock@thomassfoundation.org.uk and/or by telephone to 020 3327 4177.

Nominated Trustee

If neither the Designated Safeguarding Lead or the Executive Director are available please contact the **Nominated Trustee** (Bunmi Richards) by email to brichards@thomassfoundation.org.uk and/or by telephone to Thomas's Foundation at 020 3327 4177.

Statutory Services

If a child is suffering, or is likely to suffer a Harm, a referral to the Local Authority Designated Officer ('LADO') at one or more of the Statutory Services listed below should be made without delay.

[Wandsworth London Borough Council LADO](#)

Anita Gibbons - 07974 586461
LADO@wandsworth.gov.uk

[Lambeth London Borough Council](#)

LADO phone – 020 7926 4679 / 07720 828 700
lado@lambeth.gov.uk or
helpandprotection@lambeth.gov.uk

[Hammersmith & Fulham London Borough Council LADO](#)

LADO@lbhf.gov.uk

[Kensington & Chelsea London Borough Council LADO](#)

Aqualma Daniel
Tel : 07870 481712/ Email
Aqualma.Daniel@rbkc.gov.uk

GUIDE TO THE SAFEGUARDING POLICY AND CHILD PROTECTION POLICY

The Thomas's Foundation Safeguarding Policy and Child Protection Policy is divided into five Sections, together with a Glossary, a Resources overview and three Annexes referred to within the Policy –

Section	Title	Description
Section 1	Policy	<p>This Section explains the intentions and purpose of the Safeguarding Policy and Child Protection Policy.</p> <p>It also explains who the Safeguarding Policy and Child Protection Policy applies to.</p>
Section 2	Roles and Responsibilities	<p>This Section explains the roles and commitments of Thomas's Foundation, its Trustees, Staff and Volunteers, and the role of the Designated Safeguarding Lead.</p>
Section 3	Reporting Concerns	<p>This Section explains what conduct is covered by the Policy ('concerns'), the duty to report concerns and how to report concerns.</p>
Section 4	Responding to Concerns	<p>This Section explains how Thomas's Foundation will respond to concerns.</p>
Section 5	Recruitment Standards and Training	<p>This Sections explains how Thomas's Foundation applies child protection standards when it recruits Staff and Volunteers</p>
Glossary		<p>This Section explains some of terminology used in the Policy, and lists some key agency contacts.</p>
Resources		<p>This Section lists some key agency contacts.</p>
Annexes		
	Annex One	Reporting Form
	Annex Two	Code of Conduct
	Annex Three	Investigation Guidelines

The Safeguarding Policy and Child Protection Policy is referred to as the '**Safeguarding Policy and Child Protection Policy**' and for brevity's sake as '**the Policy**' throughout this document.

Terms used in Capital Letters are defined in the **Glossary** to the Policy.

The Policy Framework

The Safeguarding and Child Protection Policy is intended to be compliant with legislation, policy and guidance that seeks to protect children in England and Wales.

A summary of the key legislation and guidance is available [here](#).

Data Privacy Notice

Thomas's Foundation has published on its website a privacy notice which explain how it will use personal data.

All use of personal data that arises in connection with the Safeguarding and Child Protection Policy will be in accordance with the Thomas's Foundation [Data Privacy Policy](#).

1. SECTION ONE – The Policy

Thomas's Foundation

Thomas's Foundation is a registered charity established for the purposes of the advancement of education generally, including by promoting and providing educational programmes for children and young people worldwide; establishing and maintaining scholarships, bursaries, and grants; and providing and assisting in the provision of educational, training, and recreational facilities for young people and children in developing countries.

1.1. Rational and Purpose of the Policy

Purpose

The purpose of the Safeguarding and Child Protection Policy is:

- **to protect children and young people who receive Thomas's Foundation's services from harm. This includes the children of adults who use Thomas's Foundation's services.**
- **to provide Staff and Volunteers, as well as children and young people and their families, with the overarching principles that guide Thomas's Foundation's approach to child protection.**

Rationale

Thomas's Foundation has implemented the Policy because it believes that:

- children and young people should never experience abuse of any kind; and
- Thomas's Foundation has a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

Principles

The Policy is based on these principles:

Beneficiaries

- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- every person associated with Thomas's Foundation should feel safe and protected from any form of abuse and neglect

- **the welfare of children is therefore paramount in all the work that Thomas's Foundation does and in all the decisions Thomas's Foundation takes**

People

- people in positions of responsibility within Thomas's Foundation will work in accordance with the interests of children and young people and follow the Safeguarding and Child Protection Policy
- people in positions of responsibility within Thomas's Foundation ensure that the same opportunities are available to everyone regardless of gender, ethnicity, disability, sexuality all beliefs and that all differences between individuals will be treated with respect
- All Staff and Volunteers should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children
- Anyone about whom a concern is raised should feel confident that they will be supported, and the matter will be handled sensitively, and that appropriate action will be taken.
- **All Thomas's Foundation stakeholders should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively, and appropriate action taken.**

1.2. Who does the Policy apply to?

1.2.1. This Policy applies to **anyone** working on behalf of Thomas's Foundation including the Board of Trustees, the executive and paid Staff, Volunteers, workers, contractors, consultants, agency staff and students.

1.2.2. The term '**Staff**' as used in the Policy refers to all Thomas's Foundation employees and workers of whatever nature and status.

1.2.3. The term '**Volunteer**' refers to any person who provides support, services, assistance, or other engagement with Thomas's Foundation operations.

1.3. What is the Policy For?

1.3.1. The Policy describes the policies and processes established by Thomas's Foundation in relation to –

- how to report concerns and how they will be investigated whether they are current or historic in nature;
- raising awareness about Thomas's Foundation's safeguarding expectations;
- ensuring Staff and Volunteers are trained in relation to their roles and responsibilities under the Policy and are supported in their roles;

- ensuring consistent good safeguarding practice, including the promotion of a zero-tolerance approach to child-on-child violence and harassment in which children are confident to report it and Staff are confident to identify and respond to it;
- **the promotion and establishment of a culture of safety, equality, and protection for all persons associated with Thomas's Foundation.**

1.4. Connection with Other Thomas's Foundation Policies

The Policy should be read alongside all other relevant Thomas's Foundation organisational policies, procedures, guidance, and other related documents, including:

- dealing with disclosures and concerns about a child or young person
- managing allegations against Staff and Volunteers
- recording concerns and information sharing
- child protection records retention and storage
- Safeguarding Code of Conduct for Staff and Volunteers
- behaviour codes for children and young people
- photography and sharing images guidance
- safer recruitment
- online safety
- anti-bullying
- managing complaints
- whistleblowing
- health and safety
- induction, training, supervision, and support
- adult to child supervision ratios

2. SECTION TWO – ROLES AND RESPONSIBILITIES

2.1. Thomas's Foundation Commitments

In order to ensure the effective implementation of the Policy Thomas's Foundation will do the following –

a) Protection

As provided in Section 1 of the Policy:

- Safeguard and promote the welfare of all participants in Thomas's Foundation activities;
- Adopt and implement the Safeguarding Code of Conduct to clarify behaviours expected from all Thomas's Foundation stakeholders - a copy of the Safeguarding Code of Conduct is included as Annex Two to this policy.;
- Be alert to signs of abuse to Thomas's Foundation's beneficiaries within the child's family or from outside, and take steps to protect individuals from any form of abuse, or neglect whether from an adult or another child;

b) Reporting and Addressing Concerns

As provided in Section 3 and Section 4 of the Policy:

- Design and invoke the relevant procedures which are in place to investigate and resolve safeguarding issues
- Promote the systems in place for Thomas's Foundation's beneficiaries to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;
- Appoint a Designated Safeguarding Lead and appoint a Nominated Trustee to execute the roles and responsibilities designated to the Nominated Trustee by this Policy;
- Deal appropriately with every suspicion or complaint of abuse and support those who have been abused in accordance with applicable rules and obligations;
- Design and operate procedures which, so far as possible, ensure that relevant parties and others who are innocent are not prejudiced by malicious, false, unsubstantiated, or unfounded allegations;
- Be alert to children who are at potentially greater risk of harm, including children who need a social worker and children requiring mental health support;
- Encourage a culture of listening to those who raise concerns including victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by Thomas's Foundation's to protect them;
- Expect all people in scope of this Policy to observe their reporting obligations
- Report to the appropriate authorities and exercise its rights to exit partnerships and/or any stakeholder relationships if the provisions of this

Policy - including the Safeguarding Code of Conduct and related procedures - are not met.

c) People and Training

As provided in Section 5 of the Policy:

- Not knowingly engage, directly or indirectly, anyone who poses a risk to children, nor fund any individual or organisation that does not meet Thomas's Foundation's child protection compliance standards in their operations and activities;
- Practice safe recruitment in checking the suitability of Trustees, Staff, and Volunteers to work with children.
- Provide guidance and training as to Thomas's Foundation's approach to safeguarding and child protection and about the safeguarding and child protection responsibilities the Thomas's Foundation undertakes;
- Provide Trustees of the Board appropriate safeguarding and child protection training, both on induction and thereafter regularly updated

2.2. Individual Roles and Responsibilities

Trustees

2.2.1. The Thomas's Foundation Board of Trustees will always act collectively in children's best interests. The Board of Trustees will take all reasonable steps to prevent harm to children by setting policies and procedures that provide appropriate safeguards and protection, including but not limited to the Policy.

2.2.2. The Board of Trustees has overall collective accountability and responsibility for the Policy. The Trustees will appoint one of their number to act as the **Nominated Trustee** with special responsibility for oversight of safeguarding and child protection operational measures put in place at Thomas's Foundation.

Staff and Volunteers

2.2.3. The Thomas's Foundation executive team, supported by the Board of Trustees, has responsibility for implementing the Policy. They will do so by providing leadership, guidance, training, and support to both Staff and Volunteers to give effect to the Policy.

2.2.4. All Staff and Volunteers are subject to the Policy. Each individual member of Staff and each Volunteer must at a minimum –

- Be aware of the contents of the Policy and the identity of the Thomas's Foundation Designated Safeguarding Lead
- Be aware of and comply with the Thomas's Foundation Safeguarding Code of Conduct
- Report concerns as required by the Policy
- Read Part 1 of the Department of Education Guide to Keeping Children Safe in Education (2024) and know how to identify and be alert to possible causes or symptoms of abuse
- Conduct themselves appropriately and maintaining suitable standards of conversation and interaction with and between children
- Be aware of and follow the Thomas's Foundation Photography Policy Statement with regards to taking and using photographs of children.
- Understand their responsibilities in being alert to signs of abuse, to be open, accepting, and ready to listen to a child and to follow the procedures outlined in this policy in the event of a disclosure. Identify children at risk of being drawn into terrorism and to build child's resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views
- Cooperate with any investigations initiated in relation to concerns raised pursuant to the Policy

2.3. The Designated Safeguarding Lead

2.3.1. Thomas's Foundation has appointed a **Designated Safeguarding Lead** to be the lead contact person in respect of all matters connected with the Policy.

2.3.2. The Designated Lead (DSL) is the person to whom anyone working within the Thomas's Foundation is required to report instances of actual or suspected child abuse or neglect.

2.3.3. The Designated Safeguarding Lead will ordinarily be a member of Staff whose role specifically encompasses the roles and responsibilities of the Designated Safeguarding Lead as explained in the Policy.

2.3.4. The roles and responsibilities of the Designated Safeguarding Lead include to:

- receive and act upon reports of **concerns (See Section 3.1 of the Policy)** and enact this Policy as a first point of contact
- initiate investigations when a concern has been received

- escalate to the Trustees the results of any investigation and to recommend a line of action in pursuance of an incident resolution
- enact the decisions taken by the Trustees
- act as a source of support, advice and expertise to Staff and Volunteers on matters of safety and safeguarding
- keep detailed, accurate, secure written records of concerns and any follow up documentation
- understand the assessment process for providing early help and intervention
- encourage a culture of listening to children and taking account of their wishes and feelings
- maintain up to date training (at a minimum every two years) in relation to the matters covered by the Policy
- to be familiar with and understand the Department of Education Guide to '[Keeping Children Safe in Education](#)' (2024), the UK Government guidance to '[Working Together to Safeguard Children](#)' (2023), '[What to do if you're worried a child is being abused](#)' (2015) and the [Prevent Duty](#) (2023)
- ensure that all Volunteers read, understand, and have access to the Policy and Part 1 of [Keeping Children Safe in Education](#)' (2024)
- ensure that all parent Volunteers working in schools are aware of that specific school's safeguarding procedures
- ensure that the Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly
- ensure the Policy is available publicly by way of the Thomas's Foundation website and social media

2.3.5. The name and contact details of the Designated Safeguarding Lead are stated at the front sheet of this Policy.

2.3.6. The Nominated Trustee and/or the Executive Director will act as alternate Designated Safeguarding Lead to cater for situations whereby the Designated Safeguarding Lead is not available to act for whatever reason.

3. SECTION 3: REPORTING CONCERNS

3.1. Duty to Report Concerns

3.1.1. A **concern** is a reasonable belief that a child may have suffered or is at risk from one or more of the following –

Abuse
Physical Abuse
Emotional Abuse
Sexual Abuse
Neglect
Other Concerns

These terms are explained and defined in detail in the **Glossary** to the Policy.

3.1.2. Thomas's Foundation maintains an attitude of 'it could happen here' where safeguarding and child protection are concerned.

3.1.3. All persons who are subject to the Policy have a duty to:

Be aware of the **Signs of Abuse**. This term is explained and defined in detail in the Glossary to the Policy. In particular they must -

- Report any concerns they may have about the safety and/or well-being of children;
- Report any concerns they may have about the safety and/or well-being of other persons associated with Thomas's Foundation;
- Report any safeguarding concerns about Staff or anyone else associated with Thomas's Foundation; and
- Follow up on any such reports to ensure that appropriate action is or has been taken.

Any person who is subject to the Policy must act if that person has concerns.

If a person has concerns, they must be reported to the Designated Safeguarding Lead directly and/or using the Thomas's Foundation Reporting Form.

3.1.4. The duty to report must be observed when the concern arises.

The report of a concern does not require proof or evidence but must not be spurious or deliberately misleading. The duty to report concern must be observed in the broader sense, and to include concerns for people in

need and in relation to the existence of a circumstance that engenders immediate risk of harm

3.2. What must be reported?

3.2.1. Recognising indications of potential abuse is complex and there is no simple checklist to allow easy recognition. There are potential warning signs that all can be alerted to, but they should be observed and assessed with care. It should not be automatically assumed that abuse is occurring, and talking to the child may reveal something quite innocent. It is important, however, not to dismiss significant changes in behaviour, fears, worries, and physical indicators a child is exhibiting. Close attention must be paid to any **Signs of Abuse**.

3.2.2. Staff and Volunteers should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the Designated Safeguarding Lead.

3.2.3. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

3.3. Concerns – Categories under the Policy

3.3.1. Concerns are considered for the purposes of the Policy to be either **Low Level** concerns or conduct which constitutes **Harm**.

3.3.2. The terms **Low Level** and **Harm** are used in the Policy (and defined in the Glossary to Policy) to determine the appropriate actions to be taken in response to receipt of concerns. They are not used in any way to describe the impact or actual harm that may be caused by the conduct giving rise to the concern.

Low Level

A Low Level concern is any concern, no matter how small, and even if no more than a sense of unease that a member of Staff may have acted in a way that is inconsistent with expected standards whether inside or outside work. No concern is too small or minor to raise under the Policy.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;

- taking photographs of children on their mobile phone/other device;
- engaging with a child on a 1:1 basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating, or offensive language, email, messaging, use of social media sites or other communication between adults and children outside agreed protocols;
- any incident where a member of Staff or Volunteer feels that his/her actions or behaviour towards a child or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.

Harm

Conduct that may meet the Harm threshold are those that might indicate a person will pose a risk of harm if they continue to work or act in their present position, or in any capacity with children, for example where the individual has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Harm includes behaviour that may have happened away from Thomas's Foundation which creates a transferable risk.

3.4. How to Raise a Concern

3.4.1. It is everyone's responsibility to raise concerns at the earliest opportunity. Concerns must be raised with the Designated Safeguarding Lead directly (by any means possible) and by using the Thomas's Foundation Reporting Form. The Designated Safeguarding Lead (or his or her alternate) should always be available to discuss any concerns.

3.4.2. If in exceptional circumstances the Designated Safeguarding Lead and his or her alternate is unavailable, escalation to the Nominated Trustee should be undertaken as soon as possible using the contact details on the front page of the Policy.

3.4.3. If a child is suffering, or is likely to suffer a Harm, a referral to the Statutory Services listed at the front page of the Policy must be made.

3.4.4. Any action taken by a Volunteer or member of Staff pursuant to Section 3.4.3 above should then be shared with the Designated Safeguarding Lead as soon as is practically possible.

3.5. Concerns Raised by a Child

3.5.1. If any person has concerns reported to them by a child, they should first do the following:

- remain calm – ensure that the child is safe and feels safe
- listen to the child, limit any questions to those that ask the child to describe, tell or explain what happened
- show and tell the child that what they say is taken seriously
- reassure the child and stress that the child is not to blame
- explain that someone else will be asked to help with the situation
- make a note of what the child says as soon as possible
- maintain confidentiality – only tell others if it will help protect the child
- avoid taking any premature actions that may be inappropriate or unnecessary
- avoid making commitments that cannot be kept

3.5.2. At an appropriate point the person should take one or more of the steps described in Section 3.4 of the Policy.

4. SECTION 4: RESPONDING TO CONCERNS

4.1. Reporting Concerns

4.1.1. Thomas's Foundation will accept information, referrals, or disclosures, collectively referred to as a '**concern**' or '**concerns**', from a range of sources, including children, parents, Staff and Volunteers,

4.1.2. All concerns will be treated seriously and handled professionally, confidentially, and expediently.

All person who are subject to this Policy must contact the Designated Safeguarding Lead as soon as possible if they witness any form of abuse towards children, or come upon information regarding abuse towards children, or information concerning their safety and wellbeing.

4.1.3. If the Designated Safeguarding Lead is not available (or is implicated in the concern), then the Executive Director and/or the Nominated Director should be contacted using the contact details on the front page of the Policy.

4.1.4. The Designated Safeguarding Lead may consult with the Executive Director, Nominated Trustee and/or any Staff member as necessary in relation to any concern shared with the Designated Safeguarding Lead and/or referred to the Statutory Services detailed below.

4.2. Statutory Services

4.2.1. Any person can contact emergency services or make a referral directly to relevant statutory agencies and should do so especially if they are concerned about the immediate risk to the safety or welfare of a child. These services are referred to as the '**Statutory Services**' in this the Policy.

4.2.2. The relevant contact details for the Statutory Services are listed on the front page of the Policy.

4.3. Response to Concerns

4.3.1. All concerns will be viewed as being made in the best interests of the child regardless of the outcomes of any investigation. Thomas's Foundation will ensure that the interests of anyone reporting concerns in good faith are protected.

- 4.3.2. Upon receipt of a concern, the Designated Safeguarding Lead will make an initial assessment of the information contained within the concern, based on the quality and reliability of that information.
- 4.3.3. The Designated Safeguarding Lead will determine which of the following actions are required:

Immediate Action: Referral to Statutory Services if the concern contains information that suggests the commission of criminal offences and/or there is a risk of Harm.

Investigation: If the concern contains information that suggests Low Level conduct an investigation will be initiated.

4.4. Immediate Action – Referral to Statutory Services

- 4.4.1. If a concern is referred to Statutory Services Thomas's Foundation will fully cooperate with the Statutory Services as required in relation to any investigation and/or action taken by the Statutory Services.
- 4.4.2. The Designated Safeguarding Lead will identify the best ways available to correct and/or avoid any further harm pending investigation and action by the Statutory Services.

4.5. Internal Investigation

- 4.5.1. On receipt of a concern, the Designated Safeguarding Lead may initiate an investigation accordance with this Policy. The investigation will be carried out according to the Thomas's Foundation Investigation Guidelines, and will encompass the following:
- The appointment of an investigator (which may be the Designated Safeguarding Lead).
 - The setting of Terms of Reference for the investigation, which may include the aims and objectives of the investigation, the methods and scope of the investigation, the time frame.
 - A methodology for confidential communications.
 - The conducting of interviews.
 - An investigation report and recommendations as to any required actions.
- 4.5.2. A copy of the Thomas's Foundation Investigation Guidelines is included as Annex Three to the Policy.
- 4.5.3. The Designated Safeguarding Lead may consult with the Nominated Trustee and/or any Staff member as necessary as to the best course of action in relation to the investigation.

4.5.4. The Designated Safeguarding Lead may consider the context within which concerns have been raised, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare and should record these appropriately.

4.5.5. The Designated Safeguarding Lead should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to **Other Concerns** (as explained and defined in the Glossary) including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

4.6. Taking Steps to Avoid Harm

4.6.1. The Designated Safeguarding Lead must act quickly to correct or avoid the harm which has arisen in relation to the safeguarding concern. If appropriate, the views of the child will be taken into account when considering the appropriate course of action but will not be determinative. Actions may include:

- Managing any support for the child affected internally, seeking advice from children's social care where required;
- Making a referral to the Statutory Services;
- Informing parents, as appropriate, of any action to be taken under these Policy. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Executive Director, Nominated Trustee, children's social care, the police and / or the child before discussing details with parents.

4.7. Staff and Volunteers

4.7.1. Thomas's Foundation has implemented a number of policies to manage concerns arising from any person working for, or on behalf of, Thomas's Foundation and/or a school associated with Thomas's Foundation, whether paid or unpaid.

4.7.2. Thomas's Foundation will aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations in accordance with the particulars of each location.

4.7.3. Thomas's Foundation may exit any contractual relationship, or stakeholder commitment with any person suspected of not upholding the Safeguarding Code of Conduct in this Policy.

4.8. Requirement to Disclose

4.8.1. All Volunteers are required to 'self-declare' if there are any changes to their own criminal record or if there is a change in their personal

circumstances that would materially affect their suitability to act as Volunteers.

5. SECTION 5: RECRUITMENT STANDARDS AND TRAINING

5.1. Recruitment Policy

5.1.1. Thomas's Foundation is committed to child safe recruitment, selection, and screening practices. These practices aim to recruit the safest and most suitable people to work in within Thomas's Foundation's programs.

5.1.2. Thomas's Foundation has a thorough and standardised recruitment process that applies to the recruitment of all employees, contractors, trustees, interns, and Volunteers, whether paid or unpaid, full time or part time, temporary or long-term, having direct or indirect contact with children.

5.2. Recruitment Standards

5.2.1. Thomas's Foundation recruitment process will encompass the following standards:

- a) Any advertisements used for vacancies will clearly state that this Policy including screening procedures is in place.
- b) Applicants will be required to submit a detailed application form when applying for a position. This form will ask for extensive information about the applicant's background such as dates and places of employment, education, and other activities.
- c) All positions will be assessed for the level and risk in relation to contact with children. Positions working directly with children will require the highest level of screening and the applicant must possess relevant qualifications and experience in working with children.
- d) A basic, standard, or enhanced disclosure (depending on level of contact with children) through the Disclosure and Barring Service (DBS) (if the geographical jurisdiction of the DBS applies). Where a person is from a country outside the jurisdiction of the DBS, efforts will be made, where possible, to acquire information from the equivalent or relevant body (such as the Police) to establish information on any previous convictions or unsuitability. To ensure the appropriate management of DBS disclosures (or their equivalents), all such documentation will be forwarded for the sole attention of the Designated Safeguarding Lead.
- e) Interviews will be conducted for all positions, ideally face-to-face, but telephone interviews may be considered in the international context.
- f) Behavioural-based questions will be used during interviews as far as possible, for examples of the candidate's past behaviour and experiences with regards to working directly with children. The panel will explore the candidate's motivations for working with children, which will include value-based questions seeking information about the candidate's attitudes to children, professional boundaries,

accountability, teamwork and how they have responded to ethical dilemmas.

- g) A minimum of two reference checks will be required for all candidates nominated for recruitment by the selection panel. This will include short and long terms positions, volunteers on placement and consultants. The candidate's most recent employer/supervisor must be one of these referees. Thomas's Foundation will verify the identity of the referees and make direct contact with each of these referees. Thomas's Foundation reserves the right to request additional references.
- h) All candidates for Staff positions will be required to provide proof of identify including birth certificate, passport, driver's license, and relevant qualifications. Original documents are required for verification and authentication. Candidates for other positions may also be required to provide similar documents and information.
- i) The requirement for the potential employee to read, understand and accept compliance with the Policy and guidelines is part of the terms and conditions of employment.

5.3. Handling DBS Information

5.3.1. As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Thomas's Foundation complies fully with relevant standards regarding the handling, use, storage, retention and disposal of certificates and certificate information.

5.3.2. Thomas's Foundation also complies fully with its obligations under relevant legislation pertaining to the safe handling, use, storage, retention, and disposal of certificate information as per the Thomas's Foundation [Data Privacy Policy](#).

5.4. Trustee Applications

5.4.1. In the case of Trustee recruitment, applicants will be required to sign a general 'Declaration of Qualification for Trusteeship' which will include specific mention of compulsory compliance with the Policy.

5.4.2. This declaration will be in addition to the declarations required of potential Trustees pursuant to relevant guidance issued by the Charity Commission from time to time, including a formal statement as to fitness to act.

5.5. Education and training

5.5.1. Thomas's Foundation may require its staff to undertake training on a role relevant basis as per below:

- An induction process for all employees, contractors, trustees, officers, interns, and Volunteers which includes familiarisation with the Policy and procedures; opportunities to learn about the nature of abuse, the effects of abuse and how to recognise and respond to concerns about child abuse.
- Employees, contractors, trustees, officers, interns, and volunteers who have access to information about children such as personal contact information, including their address, specific cases or incidents, or any other details of a child's personal life must be trained to fully understand what is meant by acceptable and unacceptable sharing of information regarding children.
- If a role requires specific Safeguarding training, the training needs will be assessed, and the appropriate training made available in a manner that is location specific

5.5.2. To ensure all relevant people in scope of the Policy has an adequate level of awareness, Thomas's Foundation will provide and/or make publicly available the following:

- Copies of this Policy with a section of how to identify safeguarding concerns
- The [Volunteering Policy](#)
- Appropriate reference material on safeguarding and child protection

5.6. Registers

5.6.1. Thomas's Foundation will maintain a single central register of appointments for all Staff and Volunteers. Thomas's Foundation applies the [Volunteering Policy](#) in relation to the suitability of volunteers.

GLOSSARY

This part of the Policy explains and defines a number of the terms used in the Policy.

Term	Definition and Description
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or 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 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 from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory 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, although 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,

	<p>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. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it.</p>
<p>Neglect</p>	<p>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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p>
<p>Signs of Abuse</p>	<p>Possible signs of abuse include, but are not limited to:</p> <ul style="list-style-type: none"> a) the child says he / she has been abused or asks a question or makes a comment which gives rise to that inference; b) there is no reasonable or consistent explanation for a child's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries; c) there is a sudden or significant change in the child's behaviour; d) the child's development is delayed, the child loses or gains weight or there is deterioration in the child's general well-being; e) the child appears neglected, e.g. dirty, hungry, inadequately clothed; f) the child is reluctant to go home, or has been openly rejected by his / her parents or carers; and g) inappropriate behaviour displayed by other members of Staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one

	attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
Other Concerns	Specific safeguarding issues of which volunteers should be aware are a child missing from education, a child missing from home or care, child sexual exploitation (CSE), bullying including cyberbullying, domestic violence, drugs, fabricated or induced illness, faith abuse, female genital mutilation (FGM), forced marriage, gangs and youth violence, gender based violence, mental health, private fostering, preventing radicalisation, sexting, teenage relationship abuse, trafficking.
Statutory guidance acknowledges the following as specific safeguarding issues:	
<i>Children who are absent from education</i>	Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, "honour-based" abuse or risk of forced marriage.
<i>Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)</i>	Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or for the financial advantage or increased status of the perpetrator or facilitator; and / or through violence or threat of violence to victims (and their families). Children can be exploited by individual adults or groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.
<i>County lines</i>	County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.
<i>Cybercrime</i>	Cybercrime is a criminal activity committed using computers and /or the internet. It is broadly categorised as either "cyber-enabled" (crimes that can happen off-line but enabled at scale and speed

	online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).
<i>Domestic abuse</i>	Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.
<i>So-called "honour-based" abuse</i>	All forms of so-called "honour-based" abuse are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take.
<i>Female genital mutilation (FGM)</i>	FGM is a form of so-called "honour-based" abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.
<i>Forced marriage</i>	Forced marriage is also a form of so-called "honour-based" abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
<i>Radicalisation and the Prevent duty</i>	Thomas's Foundation has a legal duty to have due regard to the need to prevent people from being drawn into terrorism. Thomas's Foundation aims to build resilience to radicalisation by promoting

	<p>fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Thomas's Foundation is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.</p> <p>Radicalisation is defined as "the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups". Terrorism is defined as "an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause".</p>
<p><i>Online safety</i></p>	<p>Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. It is essential that children are safeguarded from potentially harmful and inappropriate online material.</p> <p>The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:</p> <p>Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.</p> <p>Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.</p> <p>Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying; and</p> <p>Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.</p>
<p><i>Sharing nudes and</i></p>	<p>Consensual and non-consensual sharing of nudes and semi-nude</p>

<p><i>semi-nude images and videos</i></p>	<p>images and / or videos can be signs that children are at risk. "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery.</p>
<p><i>Upskirting</i></p>	<p>Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim. Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.</p>

RESOURCES

There are a number of bodies that provide specialist expertise and advice in relation to safeguarding and child protection matters. These include –

<p><u>Childline</u></p>	<p>From the website –</p> <p><i>Childline is here to help anyone under 19 in the UK with any issue they're going through.</i></p> <p><i>You can talk about anything. Whether it's something big or small, our trained counsellors are here to support you.</i></p> <p><i>Childline is free, confidential and available any time, day or night. You can talk to us:</i></p> <ul style="list-style-type: none"> • <i>by calling <u>0800 1111</u></i> • <i>by <u>email</u></i> • <i>through <u>1-2-1 counsellor chat</u></i> <p><i>Whatever feels best for you.</i></p>
<p><u>Child Exploitation and Online Protection Centre (CEOP)</u></p>	<p>CEOP works with safeguarding and child protection partners across the UK and overseas. It protects children from harm online and offline with a focus on child sexual exploitation and online protection issues.</p>
<p><u>NSPCC</u></p>	<p>24-hour free and confidential telephone helpline that provides counselling, information and advice to anyone concerned about a child at risk of ill-treatment or abuse.</p>
<p><u>FASO</u></p>	<p>From the website –</p> <p><i>FASO is a voluntary organisation dedicated to supporting anyone affected by false allegations. Sadly false allegations can affect people in all walks of life, in personal or professional contexts, and often without any warning or forewarning. These can include false sexual allegations of rape, paedophilia, and assault. It can also be in the area of committing any other crime, civil or criminal.</i></p>

**SAFEGUARDING
AND
CHILD PROTECTION POLICY**

ANNEXES

ANNEX ONE

SAFEGUARDING AND CHILD PROTECTION POLICY

REPORT FORM

If anyone is in immediate danger or risk, please contact the Statutory Services listed in the Safeguarding and Child Protection Policy.

Please complete this form with as much information as possible. If you need assistance with completing the form, please contact the Designated Safeguarding Lead (DSL).

1. YOUR INFORMATION

Note: You do not need to provide your name and contact details. Thomas's Foundation encourages you to do so as this will assist in the following up and investigation of any concerns. We can keep your details anonymous if you wish.

Name (first)	Name (second)	
E-mail:	Phone:	
Did you witness the behaviour you are reporting about?	Yes	No
What is your relationship to the affected person? For example – Self, Parent/Guardian, Other		
Are you happy for the DSL to contact you about this Report?	Yes	No

I would prefer to remain anonymous if possible	Yes	No
Depending on the concern(s) being raised Thomas's Foundation <u>may</u> be able to keep your involvement confidential.		

2. WHO IS THIS REPORT BEING MADE ABOUT?	
Name (first)	Name (second)
Gender	Age (if known/approx.)
What is the role of this person?	
For example – Staff Member, Volunteer Other	

3. VICTIM INFORMATION		
Are you making this Report about behaviour that <u>you have been subject to</u> ?	Yes	No
IF YES		
<u>Please provide us with the information referred to in Section 4 of this Form below.</u>		
IF NO		
Please let us have the following information:		
Your Name (first)	Your Name (Second)	
Your role		
For example – Staff Member, Volunteer Other		

4. THE REPORT

In relation to the behaviour that you are reporting about, please let us know:

Where this took place

The date and approximate time when this took place

Please let us have as much information as possible about the behaviour:

If you are concerned that the behaviour you are reporting may happen again, please say so.

Do you have any documents, videos or other information that might be useful or relevant? If so, please describe them.

5. OTHER PERSONS WITH INFORMATION

If there are or may be other persons who any have information relating to the behaviour you are reporting about, please let us know their details

Name (first)

Name (second)

E-mail:

Phone:

Name (first)

Name (second)

E-mail:

Phone:

Did these people witness the behaviour you are reporting about?

Yes

No

Please explain why you think they may have information relating to your report.

Are you happy for the DSL to contact these people about your Report?

Yes

No

6. OTHER ACTION

Have you made a report about this behaviour to any organisation connected with Thomas's Foundation, such as the Designated Safeguarding Lead for a Thomas's school? If so please let us know:

Which organisation the report was made to

The contact details/reference of the person who you made the report to

Have you made a report about this behaviour to any other person or organisation, such as the Local Authority or the Police? If so please let us know:

Which organisation the report was made to

The contact details/reference of the person who you made the report to

IMPORTANT: BY COMPLETING THIS FORM, YOU ARE CONFIRMING THAT THE INFORMATION CONTAINED IN THE FORM IS TRUE AND ACCURTE TO THE BEST OF YOUR KNOWLEDGE.

A copy of this form with the information you have provided will be sent to you (if you have provided an email address for contact).

Privacy Statement

Data collected through this form will be held in accordance with the Thomas's Foundation Privacy Policy that can be found here:

<https://www.thomassfoundation.org.uk/privacy-policy>

All information received will be treated in confidence and only shared on a need to know basis with those individuals who will be able to manage the situation. On occasion it may be necessary to seek advice or inform outside agencies such as local authorities or law enforcement bodies. When investigating safeguarding concerns, it may also be necessary and appropriate to contact those responsible for safeguarding in other organisations, such as schools and clubs, and share information with them. In these cases, we may share your personal information (in confidence) with these other organisations.

ANNEX TWO

SAFEGUARDING AND CHILD PROTECTION POLICY

CODE OF CONDUCT

This Safeguarding Code of Conduct sets out the standards expected by Thomas's Foundation in relation to appropriate and proper behaviour, these standards being designed to protect children, ensure proper process, and protect persons from false allegations of inappropriate behaviour or abuse.

These protocols apply to Staff, Volunteers, Trustees, contractors, and sponsors and others who come into direct and indirect contact with Thomas's Foundation in all programmes and locations.

If you are a person subject to this **Code of Conduct**

YOU MUST

- Be familiar with the Safeguarding and Child Protection Policy
- Always prioritise the well-being of children
- Conduct yourself at all times in a manner that is consistent with the values of Thomas's Foundation – including being a positive role model who acts with integrity.
- Help create a safe and inclusive environment for children.
- Always obtain (or verify the existence of) consent from parents/carers and children before taking or using any photos, videos, or personal information about a child.
- Avoid placing yourself in a compromising or vulnerable position, including by keeping your personal and working/volunteering life separate, including on social media.
- Avoid face-to-face and online private one-to-one communication with a child.
- Do not be alone with a child unless that cannot be avoided.

- Treat all children and young people in any Thomas's Foundation program with respect.
- Respect cultural differences and local conditions.
- Encourage open communication between all children, young people, parents, staff, and volunteers and have children and young people participate in the decisions that affect them.
- Speak up if you observe behaviour of colleagues that cause concerns
- **Report immediately any concerns to the Designated Safeguarding Lead and/or the Statutory Services.**

YOU MUST NOT

- Engage in behaviour that is intended to shame, humiliate, belittle, or degrade children.
- Use inappropriate, offensive, or discriminatory language when speaking with a child or young person.
- Do things of a personal nature that a child can do for him/herself, such as assistance with toileting or changing clothes.
- Take children to their own home/hotel or sleep in the same room or bed as a child.
- Smack, hit or physically assault children.
- Develop sexual or any kind of relationships with children that may be deemed exploitative or abusive.
- Behave provocatively or inappropriately with a child.
- Act in a way that shows unfair and differential treatment of children.
- Hold, kiss, cuddle, or touch, hold, hug a child in an inappropriate, unnecessary, or culturally insensitive way.
- Seek to make frequent contact and spend time with any child or young person outside the program times.
- Show discrimination of race, culture, gender, disability, religion, sexuality, or political persuasion
- Use Thomas's Foundation computers, mobile phones, video, and digital cameras inappropriately, nor use them for the purpose of exploiting or harassing children.
- Show favouritism or spend excessive amount of time with a particular child

ANNEX THREE

SAFEGUARDING AND CHILD PROTECTION POLICY INVESTIGATION GUIDELINES

This Guidance is intended for use in relation to concerns that are raised with the Thomas's Foundation Designated Safeguarding Lead (**DSL**) in connection with the Safeguarding and Child Protection Policy (**the Policy**). If the DSL considers that information relating to a concern requires further investigation this Guidance should be followed.

A. Policy References

The following references are used in these Guidelines:

Term	Reference/Policy Provision
Nominated Trustee	The Trustee with special responsibility for oversight of safeguarding and child protection operational measures put in place at Thomas's Foundation; See Policy Section 2.2
Designated Safeguarding Lead	The lead contact person in respect of all matters connected with the Safeguarding and Child Protection Policy: See Policy Section 2.3
Statutory Services	The organisations referred to at Section 4.2 of the Policy
Staff and Volunteers	As defined in Section 1.2 of the Policy

B. Investigation Actions

The Designated Safeguarding Lead may consult with the Executive Director and/or the Nominated Trustee and/or any Staff member as necessary as to the best course of action in relation to any investigation. As provided in Section 4 of the Policy, the Designated Safeguarding Lead may initiate an investigation to encompass the following:

- The appointment of an investigator (which may be the Designated Safeguarding Lead).
- The setting of Terms of Reference for the investigation, which may include the aims and objectives of the investigation, the methods and scope of the investigation, the time frame.
- A methodology for confidential communications.
- The conducting of interviews.
- An investigation report and recommendations as to any required actions.

A specimen Terms of Reference is set out at the end of this Guidance. They may apply equally if an independent investigator is instructed, or if the DSL acts as investigator.

The DSL must consult with the Executive Director and/or the Nominated Trustee if the DSL wishes to instruct an independent investigator.

If the DSL, or the Investigator, determines that there is insufficient evidence to warrant an investigation into the concern, the DSL/Investigator will provide an explanation to the Executive Director and/or Nominated Trustee for this view, which may include details of any measures that may be taken in order that the investigation can proceed.

C. Guidance for Speaking with a Child

An Investigation may require the DSL or an Investigator to speak with a child, including in situations where a child has provided information that the DSL determines needs to be investigated.

A consultation with a child that takes place as part of an investigation should take place in accordance with the following guidelines.

The DSL (or an Investigator instructed as per this Guidance) -

SHOULD

- Listen carefully to the child and keep an open mind.
- Use "tell me, explain to me, describe to me" (TED) questioning. It is particularly important not to continue questioning a child if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.

- Take the child to a safe environment if there is a medical need – the DSL/Investigator should not examine any injury personally.
- Reassure the child they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- Keep a sufficient written record of the conversation.
- Secure as far as possible all other evidence, for example, scribbled notes, mobile phone records including text or instant messages, clothing and computers.

SHOULD NOT

- Interrupt the child - notes should be prepared after the consultation with the child has ended (or as soon as possible afterwards).
- Give any guarantees of absolute confidentiality but explain the need to pass on the information in accordance with the Policy so that appropriate action can be taken.
- Take any decision as to whether or not any abuse has taken place.
- Ask leading questions, that is, a question which suggests its own answer.
- Be completely alone with a child or out of sight of other adults (unless this is unavoidable or to leave the child alone would be to put the child at risk).
- Promise any specific outcome;

D. Investigation Outcomes

Investigations must be documented in the form of an **Investigation Report** and provide a conclusion as to findings of fact. They should distinguish between fact, observation, allegation, and opinion.

The Investigation Report may be made available to third parties (including parents and authorities) if such sharing is necessary and compatible with the Thomas's Foundation [Data Privacy Policy](#).

The DSL and the Executive Director and/or the Nominated Trustee may jointly decide to whom the Investigation Report (or any information contained within) may be disclosed.

E. Decision

The Investigator will notify the DSL in writing as to the outcome of the investigation into the concern. The decision must describe matters considered by the Investigator, the evidence relied on by the Investigating Officer and any measures that the Investigator recommends should be taken as a result of the decision.

The DSL will make a recommendation as to what action should be taken in relation to a concern at the conclusion of the investigation. The recommendation may be made in consultation with the Nominated Trustee.

Any decision as to what action should be taken in relation to a concern should be taken by the Executive Director, or the Nominated Trustee, as agreed between the Executive Director and the Nominated Trustee. This may include a referral to the Statutory Services.

If no referral to the Statutory Services is considered necessary, the following actions may be taken.

Staff

If the DSL/Nominated Trustee recommendation is that any action, including training, performance management or disciplinary action should be initiated against a member of Staff, that action will be handled according to Thomas's Foundation employment procedures.

Volunteers

In relation to a Volunteer the DSL/ Executive Director/Nominated Trustee may recommend –

- That no action be taken;
- That if the concern is Low Level, the Volunteer receive a reminder, refresher, or other training as is considered appropriate;
- That if the concern is Low Level, that a Volunteer be suspended from participation in Thomas's Foundation activities for a period of time in order to allow for training or education;
- That if the concern is Low Level, but it is determined that the Volunteer will not benefit from relevant training or education, that the Volunteer be removed from participation in Thomas's Foundation activities and that the relevant Volunteer Agreement be terminated;
- That if the concern relates to a possible Harm, that a Volunteer be removed from participation in Thomas's Foundation activities and that the relevant Volunteer Agreement be terminated.

Any Volunteer may appeal against the Executive Director's decision to the Chair of the Board of Trustees on the sole ground that the evidence upon which the decision has been based is incomplete, flawed, or inaccurate.

If the concern relates to the conduct of a Trustee, the recommendations of the DSL/Nominated Trustee will be provided to the Executive Director. The Executive Director will liaise with the Chair of the Board of Trustees as to the appropriate action to be taken pursuant to the Trustee Code of Conduct and or the Thomas's Foundation constitutional documents.

Template Terms of Reference for Investigator

**Thomas's Foundation
Safeguarding and Child Protection Policy**

Terms of Reference - Investigation

Jane Doe ('the Child')

<i>Designated Safeguarding Lead 'DSL'</i>	<i>[Name]</i>
<i>Investigator Instructed by Thomas's foundation 'Investigator'</i>	<i>[Name]</i>

Subject Matter of Investigation ('the concern')

[This should briefly summarise the facts and matters known to the DSL]

Instruction

The Investigator will enter into a non-disclosure and privacy agreement in relation to this matter.

The Investigator will be provided with the documentation made available to the Designated Safeguarding Lead in relation to the concern. The Investigator is requested to conduct interviews (either in-person or remotely, at the Investigator's discretion) with the following persons –

- ~ [Child]*
- ~ [Child parent]*
- ~ [All other] persons that the Investigator considers would assist the Investigator in the preparation of her findings*

The Investigator is requested to investigate the complaint and provide findings of fact by way of an initial verbal report and a follow-up written report. The Investigator's findings will inform the decision to be made by the Designated Safeguarding Lead as to any action to be taken pursuant to the Policy or otherwise.