

# Safeguarding Policy

Policy and Guidelines for safeguarding practices at PHF

Overview	
<b>Name of Policy</b>	Safeguarding
<b>Authorising Group</b>	Board
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<b>Policy Contacts</b>	Director of Grants, Head of Programme – Education, Chief Operating Officer

Register of Amendments	
<b>August 2025</b>	Policy reviewed and updated by the Funder Safeguarding Collaborative. Key updates to include our policy and practice for our work in India.

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## 1. Introduction

Paul Hamlyn Foundation (PHF) is an independent grant making organisation based in the UK. Our mission is to be an effective and independent funder, using all our resources to create opportunities and support social change. We partner with inspiring organisations and individuals (in the UK and India) to put them at the heart of leading change and designing solutions to overcome inequality. design solutions to overcome inequality.

This policy sets out PHF's approach to safeguarding. Safeguarding aims to ensure that everyone connected with our charity is safe and protected from abuse and exploitation. It includes actions to prevent abuse and mitigate the risks of this occurring, as well as actions to ensure any allegations of abuse are taken seriously and responded to appropriately.

Although PHF does not provide services to, or work directly with children, young people or communities, the Foundation plays an important role in promoting practices and organisational cultures which keep people safe through prioritising safeguarding within our internal practices and integrating safeguarding into our overall approach to funding.

This policy reflects relevant regulations, legislation, and statutory guidance on safeguarding and protection within the UK and India. It encompasses our commitment to building a culture of safety across all aspects of our work and should be read in conjunction with the Foundation's:

- Whistle-blowing policy
- Complaints procedure
- Anti-bullying and harassment policy
- Health & Safety Policy
- Social media guidelines
- Data protection policy

## 2. Scope

Safeguarding is the responsibility of everyone working at the Foundation. All staff, consultants, advisers, trustees and volunteers are expected to read and follow this guidance.

We will make those we fund aware of the Foundation's Safeguarding Policy. However, we expect the organisations and individuals we fund to have their own policies and practices in place to keep people safe and to ensure these are tailored to the specific safeguarding risks in their work.

### **3. Safeguarding & PHF's Values**

- Collaboration and connection: Safeguarding is everyone's responsibility. We engage our partners and teams across the Foundation to ensure appropriate measures are in place.
- Trust: Failure to address safeguarding issues undermines trust. We believe all allegations of harm and abuse must be taken seriously and procedures in place to ensure any allegation of abuse is responded to swiftly and appropriately
- Openness: We want our safeguarding expectations to be as straightforward and transparent as possible. We communicate our commitment to safeguarding, encourage discussions and welcome feedback.
- Thoughtfulness: We aim to promote a healthy safeguarding culture within the Foundation and encourage a culture of learning to continuously improve our approach to safeguarding.

### **4. Roles and Responsibilities**

Safeguarding is the responsibility of everyone working at the Foundation and all staff, consultants, trustees and volunteers are expected to read and follow guidance set out in this policy

Trustees have ultimate responsibility for safeguarding within PHF. To ensure the Foundation is upholding its safeguarding obligations, the Trustees:

- Review and Approve the Foundation's Safeguarding Policy on an annual basis, ensuring the Foundation is compliant with Charity Commission regulations
- Receive an annual report on safeguarding which provides details on the implementation of safeguarding measures, incidents reported and overall learning
- Receive information on safeguarding incidents and ensure that all serious incidents are reported to the Charity Commission
- Safeguarding is included in the operational risk register which is regularly maintained by the Senior Leadership Team, monitored by the Finance, Audit & Risk Committee and considered annually by all Trustees.
- Appoint a Safeguarding Lead who is responsible for championing safeguarding at Board level and providing oversight on high-risk safeguarding concerns. The Board Safeguarding Lead is Tom Wylie

The Senior Leadership Team (SLT) have responsibility for:

- Ensuring the safeguarding measures outlined in this policy are implemented within their areas of responsibility
- Ensuring their teams have access to appropriate training and support to enable them to fulfil their safeguarding responsibilities.
- Ensuring safeguarding is included in the operational risk register and that the level of risk is monitored and reviewed on a regular basis.
- Ensuring safeguarding is included as a standard agenda item in SLT meetings
- The Chief Executive Officer (CEO) is accountable to the Board of Trustees and will keep them informed on progress and any concerns in relation to safeguarding.

PHF has two safeguarding lead officers: the Director of Grants Abdou Sidibe (asidibe@phf.org.uk) and Catherine Sutton (csutton@phf.org.uk). The Safeguarding Lead Officers are responsible for:

- Acting as the first point of contact for any safeguarding concern and ensuring appropriate action is taken.
- Ensuring the Foundation's Safeguarding Policy is reviewed on an annual basis.
- Conducting an annual review of safeguarding incidents and submit an anonymised report to SLT and trustees, identifying trends and key learning for the Foundation.
- Ensuring staff have access to advice and training to help them fulfil their safeguarding responsibilities, including access to external safeguarding expertise where necessary.

In addition, PHF has a Safeguarding Focal Point in India: Skalzang Youdon, and in her absence, Consultant, Jennifer Liang. The Safeguarding Focal Point is responsible for:

- Coordinating the implementation of the Foundation's safeguarding measures in India
- Contributing to the review of PHF's safeguarding measures to ensure these are relevant and realistic within the legal, cultural and social context in India.
- Acting as a source of guidance and support on safeguarding for the India team.

## **5. Safe People**

### **5.1 Safe Recruitment**

When recruiting new members of staff or consultants/advisers who interact with funded

partners, have contact with communities or manage sensitive data on behalf of PHF, recruitment checks are undertaken to ensure the suitability of all potential candidates. This includes:

- A job description and person specification are created for all roles.
- Candidates are interviewed to check their suitability against the person specification and job requirements.
- Offers of employment will be dependent upon receipt of two satisfactory references and evidence of right to work in the UK/India.

PHF does not conduct criminal background checks as its staff do not work directly with children, young people or adults who are vulnerable to harm due to additional care and support needs. In addition, PHF's Code of Conduct requires staff to be accompanied at all times when visiting an organisation or project and they should never be alone with children, young people or adults with care and support needs in the course of their work.

PHF will continue to assess the level of safeguarding risk and determine whether criminal background checks are required. In the UK, PHF will use the government online tool to inform this decision <https://www.gov.uk/find-out-dbs-check>.

## **5.2 Training and Awareness Raising**

Upon joining PHF, new staff, trustees, consultants and advisers will be made aware of their safeguarding responsibilities and provided with support to adhere to these. This includes:

- All staff complete an obligatory online training module on safeguarding. Where appropriate, an additional induction to safeguarding is provided by their line manager or one of PHF's Lead Safeguarding Officers. Relevant consultants and Advisers will be made aware of PHF's commitment to safe working practices and provided details of safeguarding and other policies relevant to their work with the Foundation
- All new trustees and relevant consultants/advisers are briefed on the Foundation's approach to safeguarding as part of their induction. In addition, Trustees receive an update on safeguarding as part of their annual review of the Safeguarding Policy with additional training or briefings on their role in safeguarding every 3 years.
- All staff receive a refresher briefing on safeguarding following the annual review of the safeguarding policy.
- PHF provides space in meetings and other forums to discuss safeguarding and build knowledge and capacity within the team.

- Role-specific training and guidance is provided to grant officers to help them assess and support safeguarding in the organisations PHF funds
- Additional context-specific training and support is provided to the India team (staff, advisers and consultants) as required. This is provided by specialists with expertise in safeguarding within an Indian context.

### **5.3 Code of Conduct**

This Code of Conduct sets out acceptable behaviours that staff, consultants, advisers, contractors, trustees and volunteers must adhere to in their work for PHF.

#### **Professional Conduct**

- Treat everyone with dignity and respect and do not engage in any form of harassment, intimidation, victimization, abuse or exploitation.
- Do not discriminate, directly or indirectly, against any person on the basis of sex, race, ethnicity, sexual orientation, gender identity or expression, nationality, ethnic or social origin, religion, culture, language, age, disability, or any other status.
- Behave in a manner that upholds the values of PHF and avoid any conduct which could damage the reputation of the Foundation.
- Report any concerns about the safety of any individual connected with our work to the Safeguarding Lead Officer immediately.

#### **Contact with organisations funded by PHF**

- Be mindful of the power and privilege that you hold as a representative of a funder organisation.
- Only visit organisations with the prior knowledge of PHF.
- Always ask the organisation visited if they have any specific safeguarding measures that should be followed and adhere to their instructions at all times.
- Do not ask for, accept or share personal contact details with any individuals supported through PHF programmes or connect with them via social media, email, letter or telephone unless this explicitly authorized for business purpose.
- Avoid being left alone with children, young people or adults with additional care and support needs when visiting an organisation and refuse to do so if asked.

- Ensure that any children or young people attending events arranged by PHF are accompanied by appropriately checked and qualified staff.
- Never engage in a physical/sexual relationship with children, young people or individuals supported via PHF funded programmes, or develop relationships which could in any way be deemed abusive or exploitative.

## **5.4 Safety Online**

- When using social media, never share personal information or data about PHF's employees, grant holders or beneficiaries of the work funded by the Foundation.
- Report any safety issues or inappropriate conduct identified on the Foundation's social media channels to the Head of Communications and the Safeguarding Lead Officer.
- Only take photos and/or video where written, informed consent has been obtained.
- When using images in reports, presentations or other communication materials never include the person's full name or include details that could identify the person's exact location.
- Always follow PHF's social media guidelines and data protection policies when handling personal information.

## **6. Procedures for the Reporting and Response to Safeguarding Concerns**

### **6.1 Reporting Safeguarding Concerns**

Anyone working on behalf of the Foundation is required to report any safeguarding concerns to one of the Safeguarding Lead Officers as soon as possible, normally within 24hrs. Safeguarding concerns might include (but are not restricted to):

- Someone you meet in the course of your work tells you that they have or are experiencing abuse, or you see something that indicates that this may be occurring
- You see or hear something which indicates that a representative of PHF may be causing harm or acting in ways that breaches PHF's Code of Conduct.
- You identify poor practice which has the potential to cause harm or put others at risk of harm, even where this is not intentional
- You encounter online harms when acting on behalf of the Foundation. This may include illegal, abusive or harmful content.

Staff must never promise to keep a safeguarding concern a secret as they are required to report all safeguarding concerns to the Safeguarding Lead Officer. If unsure whether something constitutes a



safeguarding concern, you must still raise this with the Safeguarding Lead Officer who will decide what action, if any, is required.

Staff should not take action themselves as this could place them or others at risk. However, if someone is in immediate danger, staff should call the relevant emergency services. If this happens, staff should record the name of the person they speak to, the date and time of the call and details of any information shared or actions agreed.

## **6.2 Responding to Safeguarding Concerns**

PHF's Safeguarding Lead Officer is responsible for ensuring that all safeguarding concerns are taken seriously and responded to in a timely and appropriate manner.

Where the concern relates to the actions of a funded partner or alleged misconduct by their staff or volunteers, the procedure outlined in Section 7.4 of this policy will be followed.

In all other instances, the Safeguarding Lead Officer will:

- Assess potential risks and decide what actions are needed to reduce these risks
- Decide whether further information is required and who will gather this information
- Decide if the concern requires referral to the police or other statutory agencies, taking into account any legal and mandatory reporting requirements in the country
- Consider whether there are any potential risks associated with reporting to the police or statutory agencies and take steps to mitigate these risks
- Cooperate fully with any actions or investigation which may be initiated by statutory services.
- Ensure support is provided to anyone who may have been affected, including the person reporting the concern.
- Maintain a confidential record of the concern, decisions and actions taken.

In addition, if the concern relates to the conduct of a PHF employee, consultant, adviser, volunteer or trustee, PHF's Safeguarding Lead Officer will inform the Director of People and Culture or Chief Operating Officer and notify the CEO. Together they will decide:

- Whether to inform the subject of concern and if so, who should do this.
- Whether to pursue an internal investigation, in line with the Disciplinary Policy and Procedures

- Whether there is sufficient evidence to suspend the person or provide an alternative response that is proportionate, including restricting access to PHF activities and assets
- What welfare information or support should be provided, if required
- If a referral has been made to the police or statutory services, they should be consulted before informing the subject of concern or initiating an internal investigation.

The Lead Trustee for Safeguarding will also be informed and will provide governance oversight of the response. They will agree with the Safeguarding Lead Officer and the Chief Operating Officer whether the concern constitutes a serious incident under Charity Commission regulations and ensure that relevant reports are submitted to the regulator.

The Board of Trustees will get an overview of any safeguarding issues that have been reported, actions taken and outcomes at each Board meeting. Trustees will consider the Foundation's response and ensure all necessary actions are being taken to address risks and prevent future concerns

### **6.3 Addressing inaction by the Foundation**

Anyone who believes that PHF has failed to take appropriate action in relation to safeguarding concerns, should report this to the Trustee Lead for Safeguarding or make a report via PHF's Whistleblowing Policy

### **6.4 Learning from Safeguarding Incidents**

PHF believes there are always lessons to be learnt from safeguarding concerns. The Safeguarding Lead Officer will reflect on any lessons learned when closing a case and will identify any changes needed to prevent future incidents or strengthen the Foundation's response. A summary of learning from cases will be provided to the Board on an annual basis.

## **7. Groups using the PHF Building**

PHF provides the opportunity for outside organisations to book a room at the Foundation offices. When arranging a booking, staff must confirm as part of the standard conditions of meeting room use that the organiser takes responsibility for safeguarding issues relating to those using the room during their booking. If the room is to be used by children, young people, or adults with additional care and support needs, staff must ensure that appropriate levels of supervision are in place at all times.

## **8. Safeguarding within Grant Making**

### **8.1 Application & Assessment Stage**

As part of its application information, the Foundation provides a statement on

expectations regarding safeguarding. The Foundation expects all applicants to demonstrate that safeguarding measures are in place in the following four areas:

- **Policies & Procedures:** The organisation has a safeguarding policy (or equivalent) in place to ensure their work is delivered safely. The policy is tailored to the work of the organisation, reflects the specific legislative, regulatory and/or policy requirements in the country of operation, and is reviewed regularly.
- **Reporting and Response:** The organisation has accessible channels for people to raise concerns about potential abuse, exploitation or misconduct and is clear about how they will respond. This should include how the organisation will report safeguarding issues to the relevant authorities.
- **Human Resources:** Checks are in place to ensure the suitability of staff and volunteers (eg. References, criminal background checks). Once in post, staff and volunteers are provided with appropriate training and support to ensure they are aware and able to fulfill their responsibility to prevent harm and to recognise and respond to abuse.
- **Governance & Accountability:** The importance of safeguarding is recognised and promoted by the leadership of the organisation, who provide accountability and oversight of safeguarding and protection matters. For organisations working directly with children, young people or adults with care and support needs, this must include having a named individual responsible for safeguarding / protection.

For UK organizations, questions on safeguarding will be included in the application form and, if required, the Foundation may ask additional questions as part of its assessment process and a PHF Grant Manager will complete the Foundation's safeguarding due diligence checklist. Within India, safeguarding will be discussed with organisations as part of the selection process.

PHF recognises that organisations will have different levels of understanding and capacity on safeguarding, particularly in India where safeguarding is currently less well established. However, the Foundation must be assured that organisations have appropriate measures in place to deliver the work safely before an organisation is recommended for funding. Where organisations require support to strengthen safeguarding, PHF is not able to provide advice but we will signpost to relevant resources and information where possible (See Appendix A).

Relevant information on safeguarding arrangements will be provided to panels where the work involves work with children, young people or adults with additional care and support needs.

## **8.2 Terms and Conditions**

Once funding is approved, PHF's funding agreements outline the Foundation's expectations in regard to safeguarding for those that we fund. This includes the requirement to promptly notify PHF of serious safeguarding incidents that meet the criteria set out in Section 8.4.

### 8.3 Monitoring

PHF will monitor safeguarding in two ways:

- Monitoring requirements ask grant holders to inform the Foundation of key risks within their organisation. This includes safeguarding risks and grant holders will be required to inform PHF of any safeguarding incidents in response to this question.
- Where the funded work involves work with children, young people or adults with additional care and support needs, Grant Managers will include safeguarding as an agenda item for monitoring calls with grant holders.

### 8.4 Reporting of Safeguarding Concerns within Grant Holders Organisations

Safeguarding concerns within grant holders organisations may be identified by PHF staff during project visits or during monitoring calls. In addition, grant holders are asked to inform PHF of any safeguarding incidents:

- where there is an allegation of abuse or exploitation perpetrated by someone connected with the work funded by PHF.
- where significant harm or the risk of significant harm has occurred due to a breach or serious failure in organisational safeguarding procedures.

PHF asks grant holders to inform us of safeguarding incidents in order that we can ensure our funding is not exposing anyone to harm and to enable us to meet our regulatory requirements. However, the responsibility for responding to the concern, including notifying relevant authorities and the regulator, rests with the grant holder and should be undertaken in line with their own safeguarding procedures.

Whenever a safeguarding incident is reported to the Foundation by a grant holder, the Grant Manager will notify the Safeguarding Lead Officer to seek guidance on what further information is required.

Where PHF is satisfied that appropriate action has been taken, the Grant Manager will simply thank the grant holder for sharing details of the concern and their response. The Grant Manager will make a confidential record of the incident on PHF's issues log and where relevant cross reference to the record on the grant management system

If further information is required, the Grant Manager will call the relevant Senior member of staff in the grant holder organisation to seek feedback from the organisation on how they have dealt with the concern to satisfy itself that the organisation has responded appropriately to the concern and put the necessary measures in place. The additional information will be shared with the Safeguarding Lead Officer who will determine whether PHF is satisfied with the response. The Grant Manager will make

a confidential record of the incident on PHF's issues log and where relevant cross reference to the record on the grant management system

When discussing safeguarding incidents with grant holders:

- PHF will avoid imposing actions as it is important that the grant holder follows their own procedures and internal processes.
- Staff should not offer advice around safeguarding as PHF does not have the resources or expertise around this specialist area. If an applicant or organisation PHF works with requires advice, we will signpost them to relevant resources and information.
- PHF will only report safeguarding issues to the police or other statutory services if the organisation has failed or refused to do so and we have reasonable grounds to believe that this places individuals at continuing risk of significant harm or abuse.
- PHF expects grant holders registered in the UK to notify the Charity Commission of any serious safeguarding incidents within their organisation. The Foundation will only notify the Charity Commission of safeguarding incidents within a grant holder organisation if the grant holder refuses to do so or the incident is likely to have a material impact on PHF.
- If a grant holder is unable or unwilling to respond appropriately to safeguarding concerns, we may suspend existing funding and/or pause considering any application for future funding until improvements are made. The decision to pause funding will be taken by the relevant Head of Programme, in discussion with the Director of Grants.

## Appendix A: Useful Resources

### United Kingdom

Funder Safeguarding Collaborative offers members access to webinars, resources, training and capacity building tailored to the needs of funding organisations. Paul Hamlyn Foundation is a member of the Funder Safeguarding Collaborative (FSC) and staff can access resources via FSC intranet or requesting advice via the PHF's Safeguarding Lead.

NCVO offer a range of safeguarding know-how guidance, training and links to national and local organisations that 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.

### India

Safeguarding Resource and Support Hub South Asia Hub offering a wide range of free tools, training and advice on the prevention of sexual abuse, exploitation and harassment to support smaller, local organisations working in South Asia, with a particular focus on Pakistan and Bangladesh.

Safeguarding in South Asian Context: A Resource Guide developed by a safeguarding professionals from Bangladesh, India and Pakistan this guide provides case studies to explore the practical steps organisations can take to strengthen safeguarding, with a focus on the distinctive factors that influence the risk of harm and shape safeguarding practice in South Asia.

Prevention of Sexual Harassment at the Workplace (POSH) India Legal & HR Considerations: booklet focusses mainly on the POSH Act and other relevant laws in India pertaining to workplace sexual harassment

POCSA: Protection of Children from Sexual Offences This document provides comprehensive information on the Protection of Children from Sexual Offences (POCSO) Act