

THET Safeguarding Policy

1. Key Definitions¹

Safeguarding: In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect²

At THET we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes, taking all reasonable steps to prevent harm, including sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, including for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having appropriate and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centered and also protect those accused until determined responsible.

A child: means a person below the age of eighteen years, as defined by the UN Convention of the Rights of a Child.

A vulnerable/ at risk adult: means a person aged 18 years or more who either: Identify themselves as unable to take care of themselves or protect themselves from harm or exploitation **or**, due to their gender, age or frailty, mental health problems, learning or physical disabilities as well as disasters and conflicts, may be unable or unwilling to identify themselves as vulnerable or subject to abuse, but are deemed to be at risk.

2. Purpose

THET recognises that violence against children and at-risk adults is prevalent throughout the world and in all societies. This policy aims to ensure that procedures are in place in THET to prevent and deal with abuse.

This policy aims to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with THET. This includes harm arising from:

- The conduct of staff or personnel associated with THET
- The design, development and delivery of THET's programmes and activities

3. Scope of policy

This policy applies to the whole of THET: Board members and staff, volunteers and interns, consultants, contractors and representatives of partners engaged in THET's work.

¹ The full glossary of terms can be found in Annex B

² NHS 'What is Safeguarding? Easy Read' 2011

The policy lays out the commitments made by THET and informs staff and associated personnel of their responsibilities in relation to safeguarding.

4. Policy Statement

THET is fully committed to the safeguarding of all children and at-risk adults from all forms of violence and abuse. We take very seriously our responsibility and duty to ensure that we, as an organisation, and anyone who represents us does not in any way harm, abuse or commit any other act of violence against children and young people or place them at risk of the same.

THET ensures all who work with and engage with us understand and are supported in their meeting safeguarding roles and responsibilities. We take stringent measures against anyone who perpetrates an act of violence or abuse against a child or at risk adult.

THET commits to addressing safeguarding throughout our work, through the three pillars of prevention, reporting and response.

5. Commitments

There are several key pieces of legislation and guidance that inform the principles underpinning this policy, and our practice in relation to safeguarding children and adults, these include:

- The Children Act 1989
- United Nations Convention on the Rights of the Child 1989
- The Children Act 2004 & 2007
- The Care Act 2014
- Human Rights Act 1998
- Keeping Children Safe in Education 2020
- Good Governance Guide 2020

The following section outlines THET's Safeguarding principles, values and role/responsibilities.

THET shall:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy.
- Design and ensure all THET programmes and activities are undertaken in a way that protects people from any risk of harm. This includes the way in which information about any individual in our programmes is gathered and communicated.
- Ensure all staff have undertaken appropriate training on safeguarding at a level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to due process.

Child safeguarding

THET staff and associated personnel must:

Ensure best interests of the child/children are paramount and shall be the primary consideration in decision making.

Respect children's rights, including the right to protection and the right to participate in decisions affecting their lives, as enshrined in the United Nations Convention on the Rights of the Child, 1989.

Ensure equality of opportunity so that all children can safely access and benefit from activities regardless of their gender, ability, race, ethnicity, circumstances or age.

Demonstrate cultural sensitivity and recognition of local context in decision making and in informing procedures.

Be accountable and responsible for meeting their obligations regarding a duty of care towards children and acting where a child is believed to be at risk or has been harmed.

Work in an **honest and transparent** way, informing and explaining how we work to safeguard children.

Ensure confidentiality to protect sensitive personal data. Information will only be shared and handled on a need-to-know basis - access to information must be necessary solely for the conduct of official duties.

Work together to safeguard children both across the THET and with other organisations. This includes law enforcement and specialist child welfare agencies where necessary.

THET staff and associated personnel must not:

Engage in sexual activity with anyone under the age of 18.

Sexually abuse or exploit children.

Subject a child to **physical, emotional or psychological abuse, or neglect.**

Engage in **any commercially exploitative activities** with children including child labour or trafficking.

Adult safeguarding

THET staff and associated personnel must:

Empower, support and encourage adults to make their own decisions and obtain informed consent. (THET has engaged in developing a range of tools / approaches in order to **identify and mitigate potential risks**. All tools/approaches will be disseminated to all strategic business units to ensure a universal understanding and least intrusive response appropriate to the risk presented.)

Protect, support and represent those in greatest need.

Offer local solutions through working closely with communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

Be accountability and transparent in delivering safeguarding.

Work together to safeguard adults both across the THET and with other organisations. This includes law enforcement and specialist welfare agencies where requested.

Not engage in and report any sexual abuse or exploitation of at-risk adults, and not subject any beneficiaries to risks of physical, emotional or psychological abuse, or neglect.

THET staff and associated personnel must not:

Sexually abuse or exploit adult.

Subject any adult **physical, emotional or psychological abuse, or neglect.**

Engage in **any commercially exploitative activities** with at risk adults including forced labour or trafficking.

Protection from Sexual Exploitation and Abuse (PSEA) of all child and adult beneficiaries

THET staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance (under the age of 18 or above), since they are based on inherently unequal power dynamics.

Additionally, THET staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by THET staff member or associated personnel to the nominated lead.
- Identify relevant PSEA reporting processes, where applicable, of (I)NGO staff in-country. This is particularly important when THET staff observe a PSEA incident and/or have a concern about a staff member from another organisation THET is not associated with.
- Whereas safeguarding of beneficiaries is the primary objective of this policy, the safeguarding of THET staff and associated personnel is also of paramount importance to ensure an inclusive, trusting and safe organisational environment. THET has a strict non acceptance policy against any safeguarding incidents internally and externally. For more information, please refer to THET Anti-bullying Policy and Code of Conduct.

The above commitments are in line with and supported by the THET Values. These values govern our decision making, organisational culture and behaviours and our dealings with external contacts and underpin how we implement this policy.

6. Sanctions

Breaches of this policy will be investigated in accordance with disciplinary procedures, contractual agreements, and a referral may be made to statutory authorities for criminal investigation under the law of the country in which the incident has been reported. Breaches may incur sanctions including disciplinary action leading to possible dismissal, termination of all relations including contractual and partnership agreements, and where relevant, appropriate legal or other such actions. If a legitimate concern about the suspected abuse of a child or young person is raised but is determined to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations.

7. Preventive action

The key to mitigate any safeguarding risk is prevention. THET will achieve this by embedding organisational awareness, good practice and promoting positive action which will lead to earlier detection, response, and reduction in safeguarding offenses. THET programme/project design, development and delivery will be regularly and appropriately assessed for safeguarding risks, mitigating any direct or indirect negative impacts on children and adults through THET activities.

In addition to the actions outlined in this policy:

- All appointed staff will have Security / background checks, commensurate with the safeguarding requirements of the role.
- Potential staff members will be required to appropriately answer a minimum of one safeguarding question during the interview processes.
- Due diligence in ensuring all staff and associated personnel have undertaken initial and regular refresher safeguarding training appropriate to their post/ role.
- Upon employment new staff will sign to declare full understanding and commitment to THET's Safeguarding Policy
- Annual review of the Safeguarding Policy and Tools.

8. Enabling reports

THET will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. In no circumstance should concerns of abuse and inappropriate behaviour be ignored. Alleged safeguarding cases should be reported to the nominated lead or/ Safeguarding Committee Members in line with THET procedure. Information must be recorded in writing by sharing the in annex D outlined reporting template. All reports should be submitted to safeguarding@thet.org.

THET's Whistleblowing policy covers the procedures and protections in place for staff who wish to raise a concern. A THET employee who raises a genuine concern about suspected safeguarding issues will not face action if the concern is determined to be unfounded. Any employee who makes false and malicious accusations, however, will face disciplinary action. An employee alleged to be a perpetrator of abuse will be dealt with in line with THET's disciplinary policy and procedures.

All others in scope of this policy will be subject to similar action and THET will sever all relations if the individual is found responsible to have committed abuse. THET will take appropriate legal or other action in the case of false and malicious accusations of child or at risk adult abuse.

THET will also accept complaints from external sources such as members of the public, partners and official bodies and has a dedicated safeguarding section on the website easily accessible for this purpose. Safeguarding reports submitted via the website [THET Statement on Safeguarding - THET](#) will be automatically forwarded to the safeguarding@thet.org inbox.

8.1 How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to the designated lead or to one of the designated Safeguarding Committee Members. However, if the staff member would like to remain anonymous, the form on the website may be used.

Safeguarding Committee

THET has a designated Safeguarding Committee which is comprised of country office representatives (3), THET HQ representatives (2) and the nominated Safeguarding Lead. Due to the potential sensitivity of safeguarding concerns and reports raised, a gender balance and diversity of staff in form of equal representation of organisational departments and level of authority is essential. The Safeguarding Committee will meet on a regular basis for reflection, discussion on challenges, improvements, and actions. All safeguarding concerns will be discussed in confidence and with identified committee members ensuring rapid and appropriate response. Safeguarding Committee Members are regularly reviewed and undergo extensive safeguarding training and safeguarding investigation training. Contact details of the members are accessible to all THET staff and associated personal.

Nominated Lead Person (Safeguarding Focal Point)

Ben Simms, Chief Executive Officer is the Nominated Lead Person for the purposes of this policy. Ben.simms@thet.org (See Annex A for responsibilities)

Trustees Responsibilities: (As stated in Principle 3 of *The Charity Governance Code*)

- Trustees understand their safeguarding responsibilities and go beyond the legal minimum to promote a culture in which everyone feels safe and respected.
- Safeguarding policies and procedures are appropriate and regularly reviewed
- Safeguarding risks are identified, managed and recorded
- Trustees, staff, volunteers and people who work with the charity understand the safeguarding policy and know how to speak up and feel comfortable raising concerns.
- Appoint a **Designated Trustee for Safeguarding (see Annex G)**

9. Response

THET will investigate safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations. Detailed procedures can be found in Annex C.

THET will apply appropriate disciplinary measures to staff found in breach of policy (please see disciplinary policy).

THET will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor. The safeguarding lead will determine, within the first 48 hours, the immediate action required. Investigations into safeguarding concerns/reports should take place within 20 working days, where possible/appropriate, treated sensitively and no communication should be shared on the matter with any staff/persons internally or externally. However, if THET receives a safeguarding incidence reported related to a particular project, information will have to be shared with the grant holder/donor. The extend of the information shared will be depend on the donor and/or grant holder organisational policy/T&C agreed upon signed contract. All actions taken will be recorded in the Safeguarding Incident Record and kept at a secure place and password protected and/or under lockable key where internet access is not available.

10. Confidentiality

It is essential that confidentiality be maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be kept secure at all times.

11. Connected THET Policies

This policy connects to:

- THET Code of Conduct
- Whistleblowing policy
- Disciplinary and Grievance policies.

12. Further Reference:

- United Nations Principles of Older People (1999)
- United Nations Convention on the Rights of the Child (1989) and its associated regional conventions
- The International Covenant on Economic, Social and Cultural Rights
- Tear Fund: Setting the Standard: A common approach to child protection for international NGOs

13. Further information, support and advice

Internally:

Should anyone in scope of this policy require further information, clarification or support in the implementation of this policy, they should contact THET London HR or the relevant Country Director.

Externally:

- A source of national and international safeguarding advice, signposting and training is **Safer Activities For Everyone CIC** <http://www.safecic.co.uk>
- **Keeping Children Safe** (in partnership with UNICEF) <http://www.keepingchildrensafe.org.uk/> is a community of good practice that has developed in the INGO group regarding particular issues they face when undertaking development work across multiple jurisdictions.

- Where applying this policy in an international setting **local embassies** can support police liaison if needed by providing advice about the local climate/checks that can be done. They will be linked into law enforcement agencies in the UK and elsewhere.
<https://www.gov.uk/government/world/organisations/british-high-commission-lusaka>
<https://www.gov.uk/government/world/organisations/british-embassy-mogadishu>
- **CEOP** is based in the UK and is the police team that deals with child exploitation. CEOP also has a network of overseas contacts and tracks globally mobile offenders.

Annex A: Safeguarding Focal Point (Designated Lead)

Responsibilities

1. The Safeguarding Focal Point is the focal person for safeguarding within the organisation.
2. They provide advice and guidance to staff on safeguarding policy and procedures.
3. They ensure that information regarding any suspected safeguarding issue is appropriately stored and dealt with.
4. They have joint responsibility with SMT and Board of Trustees to ensure that the organisation's safeguarding policy and related policies and procedures are followed and regularly updated.
5. Leads the Safeguarding Committee
6. They are responsible for ensuring any safeguarding concerns are reported to the relevant stakeholders/ agencies.

Annex B Glossary of Terms

Beneficiary of Assistance Someone who directly receives goods or services from [NGO]'s programme. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

A child means a person below the age of eighteen years, as defined by the UN Convention of the Rights of a Child.

A vulnerable/ at risk adult means a person aged 18 years or more who either: Identify themselves as unable to take care of themselves or protect themselves from harm or exploitation *or*, due to their gender, age or frailty, mental health problems, learning or physical disabilities as well as disasters and conflicts, may be unable or unwilling to identify themselves as vulnerable or subject to abuse, but are deemed to be at risk.

Abuse means sexual abuse, or other physical or mental harm deliberately caused to a person.

Harm Psychological, physical and any other infringement of an individual's rights

Psychological harm Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Protection from Sexual Exploitation and Abuse (PSEA) The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary

General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect³

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, including sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, including for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until they are found responsible.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse the term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Annex C – Response to a safeguarding report

Procedures

1. Report is received

1.1 Reports can reach the organisation through various routes. This may be in a structured format such as a letter, e-mail, text or message on social media. It may also be in the form of informal discussion or rumour. If a staff member hears something in an informal discussion or chat that they

³ NHS 'What is Safeguarding? Easy Read' 2011

think is a safeguarding concern, they should report this to the appropriate staff member (please see below).

1.2 If a safeguarding concern is disclosed directly to a member of staff, the person receiving the report should bear the following in mind:

- Listen
- Empathise with the person
- Ask who, when, where, what but not why
- Repeat/ check your understanding of the situation
- Report to the appropriate staff member (see below)

1.3 The person receiving the report should then document the following information:

- Name of person making report
- Name(s) of alleged survivor(s) of safeguarding incident(s) if different from above
- Name(s) of alleged perpetrator(s)
- Description of incident(s)
- Dates(s), times(s) and location(s) of incident

1.4 The person receiving the report should then forward this information to the Safeguarding Focal Point or appropriate staff member within 24 hours.

1.5 Due to the sensitive nature of safeguarding concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes senior management who might otherwise be appraised of a serious incident.

1.6 If the reporting staff member is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Board (or other governance structure), or to an external statutory body.

2. Assess how to proceed with the report

2.1 Appoint a Decision Maker for handling this report

2.2 Determine whether it is possible to take this report forward

- Does the reported incident(s) represent a breach of safeguarding policy?
- Is there sufficient information to follow up this report?

2.3 If the reported incident does not represent a breach of THET's Safeguarding Policy, but represents a safeguarding risk to others (such as a child safeguarding incident), the report should be referred through the appropriate channels (e.g., local authorities) if it is safe to do so.

2.4 If there is insufficient information to follow up the report, and no way to ascertain this information (for example if the person making the report did not leave contact details), the report should be filed in case it can be of use in the future and look at any wider lesson learning we can take forward.

2.5 If the report raises any concerns relating to children under the age of 18, THET will **seek expert advice immediately**. If at any point in the process of responding to the report (for example during an

investigation) it becomes apparent that anyone involved is a child under the age of 18, the Decision Maker should be immediately informed and should seek expert advice before proceeding.

2.6 If the decision is made to take the report forward, THET will ensure that it has the relevant expertise and capacity to manage a safeguarding case. This may require seeking external assistance from specialist agencies/ individuals.

2.7 Clarify what, how and with whom information will be shared relating to this case. Confidentiality should be maintained at all times, and information shared on a need-to-know basis only. Decide which information needs to be shared with which stakeholder – information needs may be different.

2.8 Check THET's obligations on informing relevant bodies when a safeguarding concern is raised. These include (but are not limited to):

- Funding organisations
- Umbrella bodies/networks
- Statutory bodies (such as the Charity Commission in the UK)

Some of these may require THET to inform them when a report is received, others may require information on completion of the case, or annual top-line information on cases. When submitting information to any of these bodies, think through the confidentiality implications very carefully.

3. Appoint roles and responsibilities for case management

3.1 If not already done so (see above), appoint a Decision Maker for the case. The Decision Maker should be a senior staff member, not implicated or involved in the case in any way.

3.2 If the report alleges a serious safeguarding violation, THET will hold a case conference. This should include:

- Decision Maker
- Person who received the report (such as the designated lead, or manager)
- Head of Finance, HR & Operations
- Safeguarding adviser (or equivalent) if there is one

The case conference should decide the next steps to take, including any protection concerns and support needs for the survivor and other stakeholders (see below).

4. Provide support to survivor where needed/requested

4.1 Offer appropriate support to survivor(s) of safeguarding incidents. Nb. this should be offered as a duty of care even if the report has not yet been investigated.

5. Assess any protection or security risks to stakeholders

5.1 For reports relating to serious incidents: THET will undertake an immediate risk assessment to determine whether there are any current or potential risks to any stakeholders involved in the case and develop a mitigation plan if required.

5.2 THET will continue to update the risk assessment and plan on a regular basis throughout and after the case as required.

6. Decide on next steps

6.1 The Decision Maker decides the next steps. These could be (but are not limited to)

- No further action (for example if there is insufficient information to follow up, or the report refers to incidents outside the organisation’s remit)
- Investigation is required to gather further information
- Immediate disciplinary action if no further information needed
- Referral to relevant authorities

6.2 If the report concerns associated personnel (for example contractors, consultants or suppliers), the decision-making process will be different. Although associated personnel are not staff members, we have a duty of care to protect anyone from harm who comes into contact with any aspect of our programme. We cannot follow disciplinary processes with individuals outside our organisation, however decisions may be made for example to terminate a contract with a supplier based on the actions of their staff, or to report them to relevant authorities.

7. Manage investigation if required

7.1 THET’s disciplinary procedure will be used to guide the investigation.

8. Make decision on outcome of investigation report

8.1 The Decision Maker makes a decision based on the information provided in the investigation report. Decisions relating to the Subject of Concern should be made in accordance with existing policies and procedures for staff misconduct.

8.2 If at this or any stage in the process criminal activity is suspected, the case should be referred to the relevant authorities *unless this may pose a risk to anyone involved in the case*. In this case, the Decision Maker together with other senior staff will need to decide how to proceed. This decision should be made bearing in mind a risk assessment of potential protection risks to all concerned, including the survivor and the Subject of Concern.

9. Conclude the case

9.1 Document all decisions made resulting from the case clearly and confidentially.

9.2 Store all information relating to the case confidentially, and in accordance with THET policy and local data protection law.

9.3 Record anonymised data relating to the case to feed into organisational reporting requirements (e.g., serious incident reporting to Board, safeguarding reporting to donors), and to feed into learning for dealing with future cases.

Annex D – Safeguarding Reporting Template

Safeguarding Incident Report

(THET Logo)

Confidential

Details of person raising the complaint.

Name	
Date and Time	
Contact details	
Address	



External agencies contacted: Police Date: Name & Contact number: Advice received: Social Care Services Date: Name & Contact number: Advice received: Local Authority Designated Date: Name & Contact number: Advice received: Other? Date: Name & Contact number: Advice received:

Police	Date	Name & Contact details Advise received:
Social Care Services (INGOs/NGOs/state agencies)	Date	Name & Contact details Advise received:
Local Authority	Date	Name & Contact details Advise received:
Other	Date	Name & Contact details Advise received:

Person completing this please sign and date the below and email the report to safeguarding@thet.org

Name _____

Date _____

Signature _____

Annex F – Safeguarding Incident Record

This template is for the safeguarding committee use only, for the collection and recording of information obtained at the time and process.

Incident No.	Time/date	Event	Action	By whom	Done?
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Annex G Designated Trustee for Safeguarding will:

1. Have undertaken safeguarding training (e.g., THET online safeguarding training)
2. Be DBS cleared (or in-country equivalent)
3. Accept their role in ensuring:
 - a. Safeguarding has a high priority in THET
 - b. The Safeguarding strategic risk is updated prior to each FRGC and if there are any changes in legislation or guidance, or if specific concerns raised.
 - c. Policies and procedures are reviewed and updated annually:
 - d. The CEO/ Head of HR can confirm compliance with safeguarding recruitment and training requirements for all staff.
 - e. The Head of programmes and Grants can confirm partners compliance with THET safeguarding requirements
 - f. They are comfortable being a confidential point of contact for the raising of safeguarding concerns (for staff, trustees, partners, any stakeholders)
 - g. Safeguarding concerns are promptly acted upon following due process
 - h. Trustees are kept informed of safeguarding concerns
 - i. FRGC receive (four times a year) a safeguarding update