

Charity No: 1091254  
Company No: 04311973

## THE OLYMPIA CHARITABLE TRUST

(the Charity)

### SAFEGUARDING POLICY

as adopted by resolution of the Trustees on 24 July 2024

#### 1. INTRODUCTION

- 1.1 The purpose of this safeguarding policy (the **Policy**) is to set out the Trustees' commitment to safeguarding, what systems the Charity has in place to ensure its beneficiaries and those who come into contact with the Charity are safe, and what the Charity expects from other organisations and individuals with whom it works in carrying out the Charity's objects and in its operations.
- 1.2 The Charity achieves its objects through grant-making. It is unlikely that the Trustees, contractors or volunteers of the Charity will ever engage in Regulated Activity (in relation to children or adults at risk). Nevertheless, the Charity recognises that some organisations that it funds do come into contact with, work with or provides activities for vulnerable groups. The Charity will not tolerate practices which promote or facilitate abuse, harm, and/or exploitation by grant recipients, their staff or persons associated with them.
- 1.3 This Policy applies in relation to all of the Charity's activities. It applies to anyone working or volunteering on behalf of the Charity and all individuals and organisations in receipt of grant funding from the Charity. These individuals and organisations are required to familiarise themselves and comply with the requirements in this Policy. Failure to do so will be considered a serious matter.

#### 2. WHAT IS SAFEGUARDING

- 2.1 Safeguarding is action that is taken to protect and promote the health, wellbeing and welfare of people (especially children and adults at risk) and protect them from harm.

#### 3. OUR SAFEGUARDING OBLIGATIONS

- 3.1 The Trustees have a legal duty to act prudently which means that they must take all reasonable steps within their power to ensure that those who come in contact with the Charity (including those benefitting from the Charity's funding) are not harmed. This is particularly important where such persons are children and young people under 18 years of age, or adults at risk, in receipt of Regulated Activities (**vulnerable groups**).
- 3.2 The Charity will do this by ensuring:
  - 3.2.1 all concerns or suspicions of a safeguarding nature arising in the course of the Charity's work will be taken seriously and responded to swiftly and appropriately;
  - 3.2.2 all trustees and volunteers are clear about their safeguarding responsibilities and know how to respond to concerns appropriately;
  - 3.2.3 the Charity is aware of, and complies with, all statutory guidance, good practice guidance and legislation relating to safeguarding that is relevant to the Charity;
  - 3.2.4 the Charity records and reports any safeguarding concerns of which it is made aware to the relevant agencies, including the Police, and the Charity's regulators; and

- 3.2.5 all third parties with whom the Charity works shares its commitment to safeguarding and have adequate policies and procedures in place which are legally compliant and appropriate to their work (see section 4 below).

#### 4. THIRD PARTY SAFEGUARDING OBLIGATIONS

- 4.1 These obligations apply to all third parties with whom the Charity engages during the course of its operations, including in particular (but not limited to) grant recipients.
- 4.2 The Charity expects these organisations and individuals to:
- 4.2.1 take all steps within their power to ensure that vulnerable groups with whom they come into contact are protected and kept safe;
  - 4.2.2 ensure that all vulnerable groups have the same protection regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identify, or any characteristic;
  - 4.2.3 comply, where appropriate, with the government inter-agency statutory guidance [Working together to safeguard children](#) (as may be replaced or updated from time to time) unless exceptional circumstances arise;
  - 4.2.4 have a named person with a clearly defined role and responsibilities in relation to child protection, appropriate to the level at which they operate;
  - 4.2.5 have relevant safeguarding policies in place which are robustly enforced and reviewed annually or when relevant changes to legislation occur (whichever is earlier);
  - 4.2.6 provide their staff with training on their safeguarding policy as part of their induction, and to receive refresher training on the policy shortly after the policy is next reviewed and updated;
  - 4.2.7 demonstrate a commitment to safe recruitment, selection and vetting. For example:
    - (a) where they are working with vulnerable groups in the UK:
      - (i) they must ensure that all individuals employed or engaged to work in Regulated Activities are subject to a valid enhanced disclosure check for Regulated Activity undertaken through the Disclosure and Barring Service (or its successor body); it is a criminal offence for you to permit a person to engage in Regulated Activity if you know or have reason to believe that person is barred;
      - (ii) where it is not possible to request a DBS check (e.g. because the individual is a non UK national), then they must use all reasonable endeavours to obtain a 'Certificate of Good Conduct' or equivalent document(s) from the relevant country's police force; and
      - (iii) they must monitor the level and validity of the checks carried out for each member of staff;
    - (b) where they are a charity and are looking to recruit a trustee:
      - (i) they must comply with the Charity Commission's guidance, [Finding new trustees \(CC30\)](#) (as may be replaced or updated from time to time) in relation to the checks and safeguards that must be in place when recruiting trustees;
  - 4.2.8 have in place systems to ensure that all staff working with vulnerable groups are monitored and supervised and that they have opportunities to learn about child protection and safeguarding adults and other issues relevant to their roles and responsibilities;

- 4.2.9 have a clear process for recording incidents, concerns and referrals, and dealing with those through proper procedure and investigation, and ensure that referrals and reports to the statutory safeguarding partners are made properly and promptly;
  - 4.2.10 foster a culture in which their staff, volunteers and anyone else with whom they come into contact are encouraged to notify them of any safeguarding concerns or incidents as they arise;
  - 4.2.11 have clear guidance on confidentiality and information sharing;
  - 4.2.12 have in place a code of behaviour for staff, with the consequences of breaching the code clearly linked to disciplinary and grievance procedures and/or termination of their contract;
  - 4.2.13 promptly provide the Charity with evidence of their compliance with the above if requested; and
  - 4.2.14 inform the Charity immediately of significant safeguarding concerns or incidents that take place within the organisation and in particular (but not exclusively) any incident that is reported to the Charity Commission as a serious incident.
- 4.3 The Charity recognises that third parties with whom it works and grant recipients will vary widely in terms of their size, the resources available to them, and the frequency and contexts in which they work with vulnerable groups, and the types of vulnerable groups that they work with. The Charity therefore acknowledges that the manner and the extent to which third parties and grant recipients meet and adopt the expectations set out above will be different to the manner and the extent to which other organisations meet and adopt them.
- 4.4 The Charity will provide a link to a copy of this policy online and on the grant application form to make it available to all grant recipients and third parties to whom this policy applies, and such recipients and third parties will be asked to confirm their understanding and commitment to it.

## 5. DEALING WITH BREACHES OF THIS POLICY

- 5.1 The Charity reserves the right, at any time, to request evidence from any person engaged by the Charity, or with whom it works, of their compliance with the law, this policy and good safeguarding practice. If the Charity does not receive that evidence within a reasonable timeframe, or is not satisfied with the evidence that has been received, it may:
- 5.1.1 where it is concerned about something, report them to the relevant authorities, where considered appropriate;
  - 5.1.2 take such action as may be necessary to ensure the ongoing safety of the Charity's beneficiaries;
  - 5.1.3 take such action as is necessary to recover any funds given (including legal action); and
  - 5.1.4 withdraw and future funding committed.

## 6. DEFINITIONS

- 6.1 For the purpose of this Policy, the following definitions apply:
- 6.2 **Regulated Activity** are those activities as defined in The Safeguarding Vulnerable Groups Act 2006 (as amended or replaced from time to time) i.e.:
- (a) those activities which, if any adult requires them, will mean that the adult will be considered vulnerable at that particular time. These activities are: the provision of healthcare, personal care, and/ or social work; assistance with general household matters and/or in the conduct of the adult's own affairs; and/or an adult who is conveyed to, from, or between places,

where they receive healthcare, relevant personal care or social work because of their age, illness or disability; and

- (b) unsupervised activities with children, and work for a limited range of establishments with the opportunity for contact with children. These activities are: teaching, training, instructing, caring for or supervising, or providing advice/guidance, providing health or personal care or driving a vehicle for children. Relevant establishments are schools, children's homes and childcare premises.

6.3 **staff** includes trustees, directors, senior management, consultants contractors, employees, volunteers, and workers.

## **7. REVIEWING AND AMENDING THIS POLICY**

7.1 The Charity is committed to continuous development and improvement and shall accordingly review this Policy at least annually to ensure that its provisions continue to meet the Charity's legal obligations and reflect best practice.