



Sanjay Mortimer Foundation (SMF)

Safeguarding Policy

1. Statement

Safeguarding means protecting the health, wellbeing and human rights of children and young people and adults at risk, enabling them to live safely, protected from harm, abuse and neglect in line with UK legislation. Although the SMF does not provide services to, or work directly with, children/adults at risk, the Charity Commission requires all registered charities to ensure that safeguarding is a governance priority.

This document sets out the SMF's approach to safeguarding. By prioritising safeguarding within our internal practices and integrating safeguarding into our overall approach to funding, the SMF plays an important role in promoting practices and organisational cultures which keep people safe.

The SMF aims to promote safeguarding through:

- creating a safe environment for children, adults at risk, trustees, staff, volunteers, and others who come into direct contact with the organisation.
- encouraging a culture of good practice in safeguarding in organisations that are funded by the SMF, whilst recognising that it is the responsibility of the organisations we fund, to ensure that their safeguarding policies and procedures are fit for purpose, given the specific nature of their work.
- ensuring a robust response to safeguarding concerns and that learning from incidents informs improvements in practice.
- providing guidance for staff and trustees on their responsibilities and ensuring they have access to support and advice around safeguarding.

This policy is reviewed on an annual basis and approved by the SMF Trustees.

2. Roles and responsibilities

Safeguarding is the responsibility of everyone working at the SMF and all staff and Trustees are expected to read and follow this guidance.

Trustees have ultimate responsibility for safeguarding. They maintain oversight of safeguarding within the SMF through:

- An annual review of the safeguarding policy
- Appointment of a lead trustee for safeguarding, who is responsible for championing safeguarding at Board level and providing oversight on high risk safeguarding concerns. The lead trustee will ensure any serious safeguarding incidents are reported to the Charity Commission and the Trustee Board.

3. Our people

The SMF does not undertake Disclosure and Barring Services (DBS) checks as staff and trustees do not work directly with children and young people or adults at risk. Staff and trustees cannot, therefore, be left alone with children, young people or adult at risks when visiting an organisation or project and will refuse to do so if asked.



As part of the application due diligence process, the SMF ensure that any organisations or collaborators they are to partner with, who have direct access to children and young people or adults at risk, have all necessary legal checks and policies in place to protect those individuals.

If, in the future, the SMF creates new positions or takes an approach which involves regular contact with children or adults at risk, it will use the government online tool to check whether a DBS check is required <https://www.gov.uk/find-out-dbs-check>.

The SMF's approach to safeguarding including the policy will be highlighted and as part of the induction process for new staff and trustees. employees.

4. Our Approach to safeguarding through our funding process

4.1 Application stage

In general, the SMF expects all organisations applying for funding to have a Safeguarding Policy in place. Where applicable, the SMF will ask the organisation to submit their safeguarding policy with their proposal. The trustees are aware that many of the organisations it works with are schools and colleges; and so, in respect of those particular grantees the trustees are able to check the registration details of the schools on the Department for Education website, as well as other due diligence.

On a limited number of occasions, organisations may be invited to submit a proposal without having a safeguarding policy in place (for example, for a new project or as part of removing barriers for organisations led by racialised and minoritised communities). Any decision to waive the requirement for a safeguarding policy must be approved by the trustees and a condition placed on funding requiring the development of a safeguarding policy within 12 months.

4.2 Assessment stage

Drawing on the Charity Commission's guidelines, the SMF requires all applicants to demonstrate adequate safeguarding measures are in place in the following four areas:

- **Policies & Procedures:** The organisation has appropriate policies and procedures are in place to keep people safe.
- **Reporting and Response:** The organisation has accessible channels for people to raise concerns and is clear about how it will respond, including reporting to relevant authorities.
- **Human Resources:** The organisation takes steps to ensure people are suitable to act in their roles and everyone is aware of their safeguarding responsibilities.
- **Governance & Accountability:** There is clear accountability and oversight to ensure everyone connected with the charity is protected from harm.

This guidance is a living document and will be updated by the safeguarding lead in light of changes to legislation or best practice.

In any circumstances where the assessment results in concerns about the welfare of a child, young person, adult at risk or the ability of the organisation in managing its safeguarding procedures within the law, concerns should be raised immediately with the designated lead.



4.3 Approval

If an organisation is turned down at proposal stage and there are concerns about safeguarding practice, those concerns will be communicated back to the organisation, signposting which organisations/agencies may be able to help them address the issue. This communication will also be copied to the organisation's chair of Trustees or non-executive Director. A copy of this should be placed on the SMF's record.

4.4 Grant management

In line with Charity Commission guidance, grantees are required to notify the SMF of incidents that have resulted in or risk significant harm or abuse:

- where the harm was caused by someone connected with the work funded by the SMF.
- where the harm or risk of harm was created by a breach or serious failure in organisational safeguarding procedures.

Safeguarding incidents may be reported to the designated lead, identified during project visits, or shared as part of monitoring reports. The responsibility for responding to the concern, including notifying relevant authorities and the regulator, rests with the grantee and should be undertaken in line with their own safeguarding procedures.

If a report is received the designated safeguarding lead will discuss with the Trustees and agree what further information is required from the grantee:

- Where the SMF is satisfied that appropriate action has been taken, they designated lead will thank the grantee for sharing details of the concern and their response.
- If further information is required, the designated lead will contact the relevant senior member of staff in the grantee organisation to discuss the action taken. The focus should be on actions taken in response and learning rather than requesting detailed information about the names of individuals involved or incident itself.

5. Reporting & Response to Safeguarding Allegations against SMF staff or trustees

If a staff member or trustee observes, suspects, or receives a disclosure about any harm, abuse or exploitation perpetrated by to SMF staff, trustees, or consultants working on behalf of the SMF, they must:

- Inform the Designated Lead (rather than undertake any enquiries themselves), who will ensure that all concerns and allegations are taken seriously and responded to appropriately.
- Where a child or adult at risk is suffering or at risk of significant harm, the Designated Lead will notify the local authority and cooperate fully with any actions or investigation which may be initiated.
- The Designated Lead will inform the Trustee who will ensure that serious incident report is submitted in line with Charity Commission requirements.
- Other actions in line with relevant employment and other policies (such as a trustee code of conduct) will be followed.



- The Designated Lead will maintain a confidential record of the concern, actions taken and any learning or improvements which could help prevent similar incidents in the future.

6. Review

Date of Review	Changes to sections...	Approved by Name	Approved by Role