Safe services

Safeguarding Policy

Policy Summary

This policy sets out what we will do to proactively create a safe organisation that, where possible, prevents abuse, exploitation and harm, and responds appropriately where there are safeguarding risks and incidents.

Policy owner	Chief Operating Officer
Policy lead	Head of Safeguarding
Audience	All of our people
Legislation and regulation	Refer to Appendix 1 and separate Annex
Formally approved by	Risk and Assurance Committee
Endorsement date	21 December 2023
Next review	December 2026

1. Introduction

1.1 **Safeguarding at the British Red Cross (BRC) is how we prevent and respond to concerns of abuse, exploitation, and harm to children, adults, and communities, who come into contact with us or our partners.**

1.2 Safeguarding of "our people" is covered by our Dignity at Work Policy.[1]

1.3 Safeguarding is everyone's responsibility.

1.4 This policy is supported by both internal and external policies, procedures and guidance and legislation, a list of which can be found at Appendix 1 and in a separate Annex.

Definitions

1.5 Key words and terms can be found in Appendix 2.

2. Policy statement

Purpose

2.1 The purpose of this policy is to outline the BRC's commitment to safeguarding everyone with whom we interact.

Scope

2.2 This policy applies to all individuals involved in our work, both within the UK and internationally.

---

[1] National Staff working overseas on IFRC or National Society contracts working for the BRC are accountable to the Dignity at Work policy, with formal processes directed by their contracting organisations.

Safeguarding Principles

2.3   Every individual has an inherent right to a safe environment, free from any form of abuse, including harm perpetrated by our people.

2.4   We will proactively prevent, promptly identify, and effectively respond to any concerns of abuse, exploitation, or harm.

2.5   We commit to challenging power imbalances to prevent harm and abuse within our organisation and the environments where we operate.

Safeguarding Standards and Commitments

2.6   We have a zero-tolerance approach to any abuse, harm, or exploitation (including sexual exploitation and abuse) of a child or adult by our people.

2.7   We equip our people with the knowledge and tools to recognise and report safeguarding concerns effectively.

2.8   We adhere to the principle of 'do no harm', considering the needs and protected characteristics of those we support.

2.9   Using a trauma-informed approach, our responses consider the lived experience of each individual and ensure their voices are heard.

2.10   We protect whistleblowers, and those reporting concerns from retaliation.

2.11   We adopt a person-centred approach, collaborating with partners to address risks and respecting the views of the survivor/ victim wherever possible.

2.12   Safeguarding incidents are treated confidentially, prioritising everyone's well-being.

2.13   We conduct safeguarding due diligence for partnerships and the programmes and services we support, prior to service delivery.

2.14   We expect partners to uphold safeguarding standards equivalent to our own.

2.15   We continuously learn, improve, and reinforce our safeguarding culture.

2.16   We apply safer recruitment procedures to help ensure that all persons we appoint are suitable to work with children and adults.

2.17   We commit to upholding accountability and transparency in all our safeguarding work.

2.18   Our standards of behaviour are set out within our Code of Conduct, Dignity at Work policy and Professional Boundaries procedure.

Reporting and Investigating Safeguarding Concerns

2.19   Reporting any safeguarding concerns, irrespective of their nature or severity, is paramount. We cultivate a culture where individuals are encouraged and supported in promptly reporting any incident or suspicion.

2.20   Investigations of safeguarding incidents are balanced and respect the rights of all parties involved.

3.   Responsibilities

3.1   The Board of Trustees have ultimate responsibility for the policy and are responsible for championing safeguarding and overseeing the organisation's management of safeguarding risk.

3.2   The Executive Leadership Team are responsible for ensuring compliance with this policy and guiding our response to corporate safeguarding risks.

3.3   The Chief Operating Officer (policy owner) is responsible for ensuring that this policy allows achievement of external and internal standards.

3.4   The Head of Safeguarding (policy lead), together with the policy owner, is responsible for the development, monitoring, and review of this policy. The Head of Safeguarding is also the organisational lead, supported by the Board of Trustees and Executive Leadership Team.

3.5   The Executive Leadership Team/ Head of Function/ Service are responsible for policy implementation.

3.6   All of our people have a responsibility to read and follow the Safeguarding policies, procedures and processes; undertake any mandatory and other training required for their role; recognise the indicators of abuse and harm; respond effectively; respect the rights of children and adults to live a life free from abuse, exploitation and harm; and report concerns in line with our safeguarding procedures and processes.

4. Laws and regulations

4.1   This policy supports our compliance with the requirements of relevant UK Legislation, regulations and international guidance as found in separate Annex.

4.2   In cases where legal requirements diverge/ differ from the commitments of this policy, our aim is to achieve the highest standard of protection while fully complying with applicable laws.

5. Monitoring and Compliance

5.1   Our Safeguarding Team continuously monitors data to identify trends, improve prevention strategies, and ensure compliance with reporting procedures.

5.2   Any breach of this policy by our people will be investigated through our Dignity at Work, Incident Procedure and/ or Disciplinary policies and procedures. Breaches by volunteers will be addressed by the Volunteer Complaints Issues and Concerns procedure.

6. Training and Support

6.1   Mandatory safeguarding training is required of all our people, and we provide specific safeguarding training for certain roles.

6.2   All our people have access to the Safeguarding Team who offer advice and specialised support.

7. Review and Maintenance

7.1   This policy has been endorsed by the chief operating officer in December 2023.

7.2   The policy undergoes annual review, ensuring it remains current, reflecting changes in legislation, best practices, and our evolving organisational activities. It is next scheduled for full review in December 2026.

8. Appendices

8.1   Appendix 1: related documents

8.2   Appendix 2: definitions and key terms

8.3   Appendix 3: document provenance

8.4   Appendix 4: Impact assessments

Appendix 1: related documents

Document title	Relationship to this policy
Adult Safeguarding Procedure	Sets out how to recognise, respond to and record adult safeguarding concerns.
Child Safeguarding Procedure	Sets out how to recognise, respond to and record child safeguarding concerns.
British Red Cross and IFRC Codes of Conduct	Sets out the expectations we have of all our people to ensure that we uphold the highest ethical, professional, and behavioural standards to support people in crisis
Complaints, concerns and feedback policy and procedure (for service users)	Outlines how we manage complaints, concerns and feedback we receive from outside of the British Red Cross.
Complaints, issues and concerns procedure (for volunteers)	Ensures that volunteers complaints, issues and concerns are dealt with in a consistent, fair and transparent way.
Confidentiality Policy	Sets out confidentiality and data protection requirements.
Dignity at Work Policy and procedure	Ensures an open and honest work environment where everyone is treated with dignity and respect.
Disciplinary policy and procedure	Sets out our process to fairly and promptly address concerns about conduct.
Engaging with celebrities AKA Celebrity and VIP safeguarding children and adult guidelines.	Recognises that in order to maximise celebrities' contribution they need to understand the work that we do and thus may need to engage, or be seen engaging, with our direct work.
Equity, diversity and inclusion policy	Sets out our approach to equity, diversity, and inclusion and what we will do to create a safe and inclusive organisation.
Ethical Fundraising Guidance	Outlines due diligence required for all donations and partnerships.
Grievance resolution policy and procedure	Provides a constructive and supportive framework to achieve effective resolutions.
HR Policy Framework	Sets out the entitlements, rights and responsibilities applicable to all staff.
Incident Reporting Policy; and Incident Reporting and procedure	Set out how to identify, support, manage and learn from incidents, including reporting duties
Informed consent to support, care, and treatment procedure	Outlines how to obtain a person's informed consent
International Safeguarding Procedure	Sets out how to recognise, respond and record international safeguarding concerns.
Modern Slavery corporate statement	Sets out how we ensure modern slavery is not taking place in our operations and supply chain

Pre-Engagement Policy & Procedure	Sets out our approach to carrying out pre-engagement checks during the onboarding process
Professional Boundaries Procedure	Outlines how relationships between those who use our services and the British Red Cross should be set up and maintained.
Quality in UK Services Policy (to be superseded by the Quality Framework)	Sets out how we ensure high-quality service deliver.
Raising a Concern Policy and Procedures ('Whistleblowing')	Outlines the procedure for raising concerns within a supportive environment.
Recruitment and Selection Procedure	Details the process to be followed and our approach to recruitment and selection
Responding to the death of a service user Procedure	Outlines what steps to take when a person that has been supported or cared for by the British Red Cross dies.
Safecall guidance	Provides guidance on how to use Safecall.
Social Media Guidelines	Provides guidance on the safe use of social media, including engaging appropriately with children and adults.
PREVENT procedure	Outlines our commitment to responding to risks of radicalisation as a safeguarding issue in response to the government PREVENT strategy.
IFRC Child Safeguarding Policy [International]	IFRC's framework for ensuring that children are protected from all forms of violence, abuse, exploitation, and neglect in all IFRC programmes.
IFRC Global Safeguarding Action Plan (2022-5) [International]	Outlines the key actions the IFRC secretariat and National Societies in the IFRC network will take to strengthen PSEA and Child Safeguarding.
IFRC PGI Policy [International]	IFRC's approach to addressing Protection, Gender and Inclusion.
IFRC PSEA Policy [International]	IFRC's approach to the prevention and response to sexual, exploitation and abuse.
IFRC Prevention and Response to Workplace Harassment and Discrimination	IFRC's approach to workplace harassment and discrimination.

Appendix 2: definitions and key terms

In our international work, safeguarding focuses on the potential harm our people and programmes could cause to communities we support; in the UK, safeguarding also covers risks and incidents of abuse and harm to children and adults we support.

Abuse refers to the mistreatment, harm, or cruelty inflicted upon an individual, usually by another person or group. It involves the exertion of power and control over someone,

often resulting in physical, emotional, psychological, financial, or sexual harm. Abuse can take various forms.

Affected person/s refers to persons who look to or benefit from Red Cross and Red Crescent protection or assistance. This may include any person in the country or local community where BRC is operating.

Bullying is defined as persistent, offensive, abusive, intimidating or insulting behaviour, abuse of power or unfair sanctions which make the recipient feel upset, threatened, humiliated or vulnerable, which undermines their self-confidence, and which may cause them to suffer stress.

Child is defined as any individual under the age of 18 regardless of the age of majority/consent in each country. It is in line with the UN Convention on the Rights of the Child and the Children Act 1989 (UK).

Communities are defined as people in the country or local populations where BRC is operating.

Do no harm refers to organisations' responsibility to minimise the harm they may be doing inadvertently because of their activities.

Exploitation refers to the act of taking advantage of someone for personal gain, often through unfair or unethical means. It involves using another person, group, or resource for one's own benefit, usually without their consent and/or to their detriment.

Harm refers to any physical, emotional, psychological, or social injury or damage caused to an individual or entity. It can result from various actions, circumstances, or events and can have short-term or long-term consequences.

Harassment is unwanted conduct that has the purpose or effect of violating a person's dignity by creating an intimidating, hostile, degrading, humiliating or offensive environment.

Non-retaliation means any direct or indirect detrimental action recommended, threatened or taken because an individual has reported a suspicion of alleged misconduct or participated in an authorised audit or investigation. Retaliation may include adverse administrative actions, such as, but not limited to, unwarranted poor performance evaluations, changes in job duties or other negative decisions affecting the individual's terms and conditions of employment. Retaliation may also take the form of verbal abuse or harassment.[2]

Our People refers to all employees (UK-based and overseas delegates), consultants, volunteers, interns, staff-on-loan, and those working under our name and legal status.

Power imbalance is an environment, relationship or interaction where one party has far more social power than the other.

Protected characteristics People are legally protected from discrimination by the Equality Act 2010 (UK). It is against the law to discriminate against someone because of the following protected characteristics: age; disability; gender reassignment; marital or civil partnership status; pregnancy and maternity; race including racial group, ethnic or national

---

[2] IFRC PSEA manual

origin, or nationality; religion or belief; sex; sexual orientation; Political opinion (Northern Ireland only).

PSEAH stands for the Prevention of or Protection from Sexual Exploitation, Abuse and Harassment. Harassment is not always included in the abbreviation.

SEAH refers to Sexual Exploitation, Abuse or Harassment. Harassment is not always included in the abbreviation.

Service users are people that are being, or have been, supported or cared for by the BRC.

Sexual abuse refers to the actual or threatened physical or psychological intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual harassment is a form of sexual abuse.

Sexual exploitation refers to 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. It includes transactional sex, solicitation of transactional sex and exploitative relationships.

Sexual harassment refers to any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment.

Trauma-informed approach considers not only the lived experience of the individual person, but also the kinds of **social contexts** in which everyday lives take place — relationships, community environment, and social structures.

Whistleblower refers to an individual who reports a concern regarding wrongdoing. Whistleblowers provide information, based on a reasonably held suspicion that a wrongdoing has occurred.

Violence refers to the intentional use of physical force, coercion, or aggression with the aim of causing harm, injury, or damage to individuals, groups, or objects.

Zero tolerance refers to zero tolerance of Red Cross and Red Crescent Movement staff and volunteers engaging in any form of sexual exploitation or abuse. In practice, this is a commitment to immediate operational response when a concern is raised and an obligation on any staff, volunteers and associated personnel to report concerns as soon as they arise. It includes protection of, and non-retaliation towards, whistleblowers or anyone else reporting concerns. Zero tolerance to sexual abuse, exploitation and harassment includes a prohibition on transactional sex by aid personnel, regardless of local legislation. [3]

---

[3] ibid

Appendix 3: document provenance

Date endorsed	Category	Summarise changes made	Reason for changes	Consulted	Changes endorsed by
Dec 2013	Scheduled Review	Changes to job titles and roles, legislative changes, split policy and procedure.	To reflect internal and external changes	OSIT, Education, Quality, International	Board
Dec 2016	Scheduled Review	Transfer to new policy template. Changes to titles, roles and legislation.	To ensure legal compliance and to reflect structural changes	UKMT, PPGG, Quality, SPOs, International, HR	Board
Dec 2018	Scheduled Review	Combined previously separate safeguarding adults and children policies into one overarching policy. Reflects changes in legislation and guidance/	Part of internal continuous improvement plan and safeguarding project, and to support internal and external clarity of our processes	All directorates	Board
Sep 2020	Desktop review	Update to align with SAT and new arrangements e.g., replacement of SQAC by RAC.	Update	Reviewed by Cate Sheppard, Terry Smith, Robert Sweatman, Lucy Lloyd-Scott and Esther Timson	Executive Director UK Operations
August 2023	Scheduled Review	Updated to ensure policy is fit for purpose and strategically relevant. Key changes include: • Revised definition of safeguarding • Alignment of international and UK	Accessibility and to reflect sector and organisational updates	Safeguarding Steering Group; Safeguarding Officers networks; Safeguarding Community Members;	Risk Assurance Committee, Board of Trustees

		• Updated in line with Standards: Policy and Procedure Pilot framework Q2/3 2023		Representatives from UK Operations, International, People; Retail, Fundraising; Standards Manager; Head of Compliance	

Appendix 4: Impact assessments

Privacy impact assessment

A privacy impact assessment was completed in August 2023 with the support of Information Governance. There are no significant privacy risks associated with this policy.

Equality impact assessment

An equality impact assessment was completed in July 2023 with the support of an Equity, Diversity and Inclusion Manager. As part of the process, the following were completed:

- Accessibility User testing/ feedback
- Web Content accessibility guidelines (WCAG) accessibility checks

We have considered how the policy impacts on the following characteristics:
- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race and Ethnicity
- Religion or Belief
- Sexual Orientation
- Sex and Gender
- Socio-economic status

The few potential negative impacts have defined mitigations.

Environmental impact assessment

No environmental impact identified