

Safeguarding Policy

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1. Introduction

The Royal Osteoporosis Society (ROS) is the UK's only national charity dedicated to bone health and osteoporosis. We work to improve the bone health of the nation and support everyone with osteoporosis to live well through our information and support services and advice. We influence and shape policy and practice through our work with healthcare professionals and policymakers, and we drive and invest in research.

We aim to keep members, volunteers and service users safe and protect them from harm or the risk of harm and recognise that effective safeguarding is underpinned by:

- Up to date safeguarding policies and procedures
- Clear reporting and communication systems and clear lines of accountability
- An effective recruitment and vetting process
- Clear guidance for staff and volunteers on expected behaviours and standards
- Policies being applied equitably to children and adults at risk
- Staff training appropriate to the role and continuous professional development in safeguarding
- Appropriate supervision and support for staff and volunteers
- Review and monitoring as part of auditing processes
- Effective interagency information sharing.

We recognise that in order to provide a safe and supportive environment for our staff and volunteers safeguarding must be part of our culture and central to all our actions and thoughts. We are committed to working together with both statutory and voluntary partners to ensure safeguarding remains a priority in the delivery of our services.

This Safeguarding Policy (and associated procedures) seeks to ensure that ROS undertakes its responsibilities with regard to the protection of adults at risk and children. The policy establishes a framework to support staff in their day-to-day work and clarifies the organisation's expectations.

This Policy will be made available to all staff and volunteers in the organisation. They should be read in conjunction with the Safeguarding Procedures.

2. Purpose of the Policy

This purpose of this policy is to safeguard from harm any vulnerable or at risk person who has contact with the charity – including, but not limited to, service users (including callers to General Enquiries and the Helpline), members, trustees, staff and volunteers (including fundraisers, case studies and campaigners).

It will ensure that good Safeguarding governance and quality standards are maintained within ROS and endeavour to establish best practice in safeguarding and promoting the welfare of both members and service users.

3. Scope of the Policy

ROS (Registered Charity 1102712) follows the broadest definition of safeguarding outlined by the [Charity Commission in 2021](#) which goes beyond traditional vulnerable and 'at risk' groups and applies to **protecting anyone that comes into contact with the charity from harm**. This policy applies to all aspect of the work of ROS. It applies to ROS staff, trustees, service users, fundraisers, volunteers and anyone engaged to provide services on ROS's behalf. It also applies to contractors and any other third-party organisations, institutions or individuals working for or with ROS and have direct access to staff, volunteers, supporters or service users.

Given the nature of the condition (osteoporosis) and the services that the charity provides, it is recognised that the most likely individuals that we will come into contact with, in the context of this policy, are 'Adults at Risk'.

4. Basic Principles and Definitions

Safeguarding is about protecting individual's rights to live in safety, free from abuse, harm and neglect, and keeping them safe. It involves identifying vulnerable adults and children who may be at risk of abuse or neglect and supporting them and other agencies in order to protect them from avoidable harms.

4.1 Principles of adult safeguarding

The following safeguarding principles are agreed within the [Care Act 2014](#) as a foundation to achieving good outcomes for customers.

ROS staff and volunteers will take account of the following principles in the delivery of all services:

- Empowerment: People being supported and encouraged to make their own decisions and informed consent.
- Prevention: It is better to take action before harm occurs.
- Proportionality: The least intrusive response appropriate to the risk presented.
- Protection: Support and representation for those in greatest need.
- Partnership: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability: Accountability and transparency in safeguarding practice [Social Care Institute for Excellence](#).

4.2 Safeguarding Adults at Risk (18yrs and over)

"Adult safeguarding" is the process of protecting adults with 'care and support needs' from abuse or neglect. It is an important part of what many public services do, and a key responsibility of local authorities. (Care Act 2014).

The aims of adult safeguarding are to:

- stop abuse or neglect wherever possible
- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs

- safeguard adults in a way that supports them in making choices and having control about how they want to live
- promote an approach that concentrates on improving life for the adults concerned
- raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect
- provide information and support in accessible ways to help people understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult, and
- address what has caused the abuse or neglect.

The safeguarding duties apply to any adult who:

- has care and support needs (whether or not the local authority is meeting any of those needs) and
- is experiencing, or at risk of, abuse or neglect and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

4.3 Safeguarding Children (under 18yrs)

Safeguarding Children is the process of protecting children and young people (under 18 years) from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.

A child is someone who has not yet reached their 18th birthday

In '[Working Together to Safeguard Children 2018](#)' safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

As a principle, where the age of a person in contact with the charity is unknown, we will assume that they are an adult. This assumption is based on the nature of the condition (osteoporosis) and the services that the charity provides – it is most likely individuals that we will come into contact with are adults.

5. Safeguarding Statement

We take safeguarding very seriously at ROS and believe that safeguarding children and adults at risk, and protecting them from harm, is everyone's responsibility. The following has been agreed as ROS's statement on its commitment.

"Safeguarding is everyone's responsibility – ROS is committed to safeguarding and promoting the welfare of children and adults at risk. It expects all trustees, staff and volunteers to share this commitment".

6. Safeguarding Governance

A clear structure of Safeguarding accountability supports everyone within the organisation to understand their individual responsibilities for safeguarding. The Board of Trustees has overall responsibility for ensuring that individuals are aware of and understand the principles of this policy.

6.1 Board of Trustees

Trustees hold the ultimate legal responsibility for all of ROS activities. This includes the effective management of ROS resources, the development and delivery of a long-term strategy and the protection of the charity's reputation and values. Ensuring that robust safeguarding management and reporting processes are in place is, therefore, a vital area of assurance for all Trustees.

To discharge its responsibility, the Board of Trustees will:

- Approve all safeguarding policies and procedures every two years
- Receive an annual safeguarding report from the Governance, People and Culture Advisor
- Ensure effective reporting and auditing processes are in place and that the same are regularly reviewed
- Ensure adequate resources are available for effective safeguarding training across the organisation and the implementation of safeguarding plans
- Support the development of an organisational culture that promotes effective safeguarding practices.

The Board may delegate authority on safeguarding matters to the Senior Leadership Team or Designated Safeguarding Leads, including a bi-annual review of all safeguarding policies and procedures.

6.2 Senior Leadership Team (SLT) / Chief Executive Officer

With the leadership of the Chief Executive, the SLT is responsible for all operational aspects of safeguarding at ROS, ensuring that excellent safeguarding arrangements are in place in the delivery of all services, contracts and sub-contracts.

To discharge this responsibility, the SLT will:

- Promote and embed safeguarding and a safer culture in all areas of the organisation including with ROS's partners / contractors
- Propose changes to safeguarding policies and procedures to the Board on a biannual basis
- Agree and approve the safeguarding training strategy
- Review and endorse the Safeguarding report to the Board of Trustees
- Ensure that the ROS Designated Safeguarding Leads have sufficient resources to discharge their functions detailed below
- Coordinate the investigation of concerns and allegations against staff members
- Ensure safe recruitment and selection of staff and volunteers by the implementation of robust recruitment and selection processes.

6.3 Designated Safeguarding Leads (DSLs)

Together, the Governance, People and Culture Advisor and Director of Clinical Services act as ROS's DSLs. They will be responsible for the operational management of safeguarding and will have attended a higher level of safeguarding training.

They will be responsible for:

- Providing ready and accessible support and guidance to all staff and trustees on safeguarding matters
- Managing all safeguarding reports / log and acting as liaison for statutory services during any criminal or safeguarding investigation
- Reporting allegations against Trustees, staff, members, service users and volunteers to the Local Authority Designated Officer (DO) and Disclosure and Barring Service
- Supporting Safeguarding Champions with the reporting of safeguarding matters to statutory services
- Supporting Safeguarding Champions with decision making about medium and high-level risk scenarios
- Ensuring accurate records of all safeguarding concerns and secure storage
- Providing a quality and review function for all safeguarding concerns
- Working with all the above governance bodies to inform of serious or untoward safeguarding incidents as appropriate
- Ensuring the adoption, implementation and auditing of policy and strategy in relation to safeguarding
- Ensuring that serious incidents relating to safeguarding are reported immediately and managed effectively
- The Designated Safeguarding Leads act as the out-of-hours contact for all safeguarding.

6.4 Safeguarding Champions

The role of a Safeguarding Champion is to guide, support, and signpost staff, volunteers or service users on issues relating to safeguarding adults at risk and children. This role is purely for support and guidance and does not have management responsibilities with regards to safeguarding concerns/cases:

- Acting as the first point of contact within their areas for all safeguarding concerns
- Responding to safeguarding concerns and escalating incidents appropriately to the Designated Safeguarding Leads within 24 hours
- Keeping accurate records of all safeguarding concerns and ensuring that these are logged in line with the agreed corporate process
- Providing timely support and guidance to colleagues and volunteers about safeguarding issues and concerns
- Signposting volunteers and those engaged in providing services to complete the ROS reporting concern form and safeguarding email address
- Ensuring that all safeguarding reports are kept securely and in line with data protection requirements
- Liaising with statutory services in an emergency situation.

Safeguarding Champions are typically identified as Heads of Department or Line Manager who can provide a more ready and available local source of support.

Champions will be expected to have achieved a higher level of safeguarding training to be able to perform the role.

6.5 Staff and volunteers

All staff and volunteers have a shared responsibility to safeguard and promote the welfare of adults at risk and children. They should know how to identify, respond to, report and record safeguarding concerns. It is not their role to investigate or decision make (in isolation) about safeguarding situations, but to identify them and report them to the appropriate Safeguarding Champion or DSL for further support and guidance.

In some of our services and in emergency situations* staff and volunteers will be expected to report urgent cases direct to the emergency services. The relevant Safeguarding Champion and Designated Safeguarding Leads must be informed as soon as possible after the contact with the emergency services.

*An **emergency situation** is any situation in which there is thought to be an imminent risk to life or serious harm, or a serious crime being committed.

7. Consent and Capacity

ROS recognises that adults who lack capacity to make decisions that would protect and promote their own interests are potentially extremely vulnerable. All ROS members and service users are over 18 years and are, in accordance with the [Mental Capacity Act 2005](#), assumed to have capacity unless it is established that they lack capacity.

According to the Act, a person lacks capacity "if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or a disturbance in the functioning of, the mind or brain" and that any question whether a person lacks capacity must be decided on the balance of probabilities.

Where an adult lacks capacity to consent to a disclosure about a safeguarding concern it is usually reasonable to assume that they would want people close to them, or directly involved in their care to be given appropriate information about their illness, prognosis and treatment, unless there is evidence to the contrary. Where an adult lacking capacity is identified by ROS we will disclose information in accordance with the Act, were, in the opinion of the member of staff, it would be in the incapacitated person's best interests.

Regardless of an adult's capacity to give consent, if a member of staff is concerned that significant harm could be caused by not sharing information, the member of staff will disclose the relevant information regardless of permission being given by the individual.

8. Sharing Information and confidentiality

While ROS will make every effort to respect the confidentiality of any information that is disclosed under this Policy, this cannot be guaranteed. Information will be recorded and stored securely in accordance with the Data Protection Act 2018

and General Data Protection Regulation 2018, but confidentiality is not absolute, and information may have to be shared, on a 'need-to-know' basis only. Situations in which confidential information may be shared outside the ROS

- There is danger to a person's life
- There is risk of abuse to a vulnerable adult or a child
- There is a risk of severe and immediate harm to any person
- to prevent or to facilitate the investigation of a serious crime
- We are ordered to do so by a court of law
- When a person is disrupting ROS service provision (e.g. vexatious or abusive callers – when staff may pass on the individuals details in order to get their number blocked or to report them).

Sharing of information between staff and volunteers and other organisations and partners is essential for effective identification, assessment, risk management and service provision. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of adults at risk and children at risk of abuse or neglect and exploitation.

ROS will ensure that confidential information is only shared where it is lawful and ethical to do so. We will ensure that Designated Safeguarding Leads, Champions, staff and volunteers are clear about situations when they can share information with appropriate agencies and professionals working together within local information sharing protocols i.e. when they believe an adult or child is at risk or likely to suffer harm.

As a general principle, when confidential information needs to be disclosed in order to prevent harm the ROS will seek consent from the individual affected, and act transparently. However, if consent is not given and the ROS assesses the risk to be immediate and severe (in line with the circumstances listed above) the organisation will break confidentiality regardless. Staff should endeavour to be transparent about their actions to the person affected; the only exception being if doing so would put someone at greater risk of harm.

As a general principle, if someone contacts us in a public forum and we have a safeguarding concern, we will respond privately wherever possible. However, if that's not possible we will respond publicly, taking the duty to protect from harm as overriding the need for privacy.

Staff will give due regard to relevant legislation, guidance and local information sharing protocols when making decisions on sharing information including the following:

- The Data Protection Act 2018
- The General Data Protection Regulation (GDPR)
- Common Law Duty of Care – anticipate risks and prevent harm.

For more information, please refer to the ROS Privacy Policy

9. Recruitment Selection

The [Safeguarding Vulnerable Groups Act 2006](#) requires an organisation to carry out specific vetting (enhanced DBS) and checks on 'references' on staff or volunteers if they are to perform 'regulated activity'. The ROS currently do not perform regulated activity but reserve the option to carry out checks if appropriate.

Recruitment and selection will be carried out for both staff and volunteers within the legal framework that exists and will enshrine recognised good employment practice.

The principles of [Safer Recruitment](#) will be embodied in the ROS recruitment and selection procedures to ensure that the maximum amount is done to safeguard ROS members and service users.

Where an individual (including volunteers) is employed on short term contracts then ROS will ensure compliance with its safer recruitment processes through contracts.

10. Training

Safeguarding training and awareness is fundamental to the development and maintenance of a safe environment and safer organisation. Staff, volunteers and trustees will be trained to the appropriate standards in safeguarding to maintain and promote safer staff, a safer culture and a safer organisation. All members of staff, volunteers and trustees will receive training in safeguarding to a level which is commensurate to the level of responsibility of the role that is being performed. i.e. DSL will achieve a higher level of training. In ROS this means:

- Induction training for all staff – Basic awareness Level 1
- Safeguarding Champions and Managers – Level 2
- Designated Leads and deputies - DSO Level 3.
- Induction training for all volunteers.

Safeguarding training will not be regarded as a 'once only' activity, but as on-going development of skills and knowledge of safeguarding. Safeguarding refresher training events will be provided at least every three years and in response to staff turnover.

11. Safeguarding allegations against staff / volunteers

ROS recognises its duty to report concerns or allegations against its trustees, staff, service users and volunteers or by a professional from a partner organisation. Staff, volunteers and trustees must promote safer working practices for safeguarding members and service users when performing their duties.

11.1 Making Referrals to the Charity Commission

The Chief Executive will contact the Charity Commission in line with the Charity Commission guidance on reporting serious incidents. This will include serious safeguarding concerns being raised about a member of staff or an allegation is made about their conduct. In the event that the concern is raised against the CEO or a trustee the Chair of the Board of Trustees shall be responsible for making the report to the Charity Commission.

11.2 DBS legal duty to refer

The Safeguarding Vulnerable Groups Act (SVGA) 2006 (as amended by the Freedom of Information Act 2012) places a duty on employers of those working with adults at risk or children (i.e. Regulated Activity) to make a referral to the DBS in certain circumstances. The ROS do not currently perform regulated activity but reserve the option to carry out DBS checks if appropriate.

If at any time the ROS suspends or removes an individual who has had a DBS check for their ROS role due to relevant conduct, risk of harm or receiving a criminal caution or conviction for a relevant offence (or the person has resigned or left that post in circumstances where they may have been removed), then we will refer the matter to the Disclosure and Barring Service. The Designated Safeguarding Officer in consultation with CEO will be responsible for making all such referrals.

12. Support for staff and volunteers

ROS recognises that staff and volunteers that support ROS service users are sometimes faced with complex and challenging decisions in relation to safeguarding.

The impact and effect on staff and volunteers can sometimes be traumatic or upsetting especially if faced with a disclosure about abuse. ROS will provide safe and confidential environments for staff and volunteers to discuss their work and their personal and professional responses to their work.

The mechanisms in place to support staff include:

- Debriefing support for staff and volunteers so that they can reflect on the issues they have dealt with
- Regular Supervision with line manager or Volunteer and Public Engagement Manager
- Seeking further support as appropriate e.g. external H.R welfare / support, access to counselling, support groups.

13. Complaints

All complaints that are received about the conduct or behaviour of ROS trustees, staff, members, service users or volunteers will be dealt with according to our Complaints Procedure. If a complaint is identified as a potential safeguarding

concern, then ROS will ensure that it is directed through our Safeguarding Procedures.

Please also refer to the ROS Complaints Policy

14. Whistleblowing

The Public Interest Disclosure Act 1998 introduced protection for workers from reprisals for disclosing information in the public interest. It emphasises the importance that the role 'whistleblowing' can play in deterring and detecting malpractice and abuse of children and Adults at risk.

ROS will promote practical arrangements for whistleblowing to enable staff, members, service users and volunteers to voice their concerns, made in good faith, without fear of repercussion. Any member of staff or volunteer who uses the 'whistle blowing' procedure will be made aware that their employment rights are protected.

Staff members and volunteers will be supported in this individual responsibility to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children, young people and adults at risk may be at risk.

ROS will:

- Have a whistleblowing policy in place
- Have clear procedures for dealing with allegations against staff, trustees, members, service users and service users
- Encourage and support staff and volunteers to report any behaviour by colleagues that raises concern regardless of source.

Please also refer to the ROS Whistleblowing Policy

15. Quality and Review

ROS is committed to striving for excellence in the provision of all its services. We will capture all relevant data in order to evidence and monitor compliance in safeguarding. We will keep all personal data confidential and secure and process all such data according to GDPR 2018 standards.

We will actively review safeguarding cases – reporting quarterly to the Board of Trustees – to identify common themes or trends across the charity that arise from all safeguarding concerns or disclosures. This quality assurance mechanism is a crucial and integral part of the safeguarding governance arrangements. Best practice identified during any quality and review process will be fed into staff training and updating safeguarding procedures. We will review:

- The information shared
- The organisations / parties involved.
- Timeframes
- Data sharing and communication agreements

- Security measures to protect the data. i.e. encrypted emails or top secret
- Data Processing agreements and permissions. i.e. Retention and deletion of data.

Calls to the specialist nurse helpline and membership team are recorded for quality monitoring purposes and can assist with handling safeguarding concerns. See our Privacy and Data Protection policy for information about relevant data protection principles and actions.

16. Supporting Documentation

Appendix A: Safeguarding Accountability Flowchart

Appendix B: Procedure for reporting safeguarding concerns/incidents

Appendix C: Reporting a Safeguarding concern / incident form

Appendix D: Safeguarding: Practical steps if on a call

17. Signposts for further information:

[Charity Commission guidance](#)

[NCVO safeguarding resources](#)

[Bond's 'Good governance for safeguarding'](#)

18. Publicity

Any enquiries from the media concerning an allegation of abuse must be referred to the ROS Head of Marketing and Communications. Any direct question must be answered with the phrase "No comment."

19. Underpinning Legislation and Guidance

[Human Rights Act 1998](#)

[Public Interest Disclosure Act 1998](#)

[Children Act 2004](#)

[Domestic Violence, Crime and Victims \(Amendment\) Act 2012](#)

[Mental Capacity Act 2005](#)

[Equality Act 2010](#)

[Care Quality Commission \(Registration\) Regulations 2009](#)

[Vulnerable Groups Act 2006- regulated activity](#)

[Protection of Freedoms Act 2012 \(Disclosure and Barring Service\)](#)

[Safer recruitment principles and guidance](#)

[Anti-social Behaviour, Crime and Policing Act 2014](#)

[The Care Act 2014](#)

[Care and Support Statutory Guidance 2014](#)

[The Health and Social Care Act 2008 \(Regulated Activities\) \(Amendment\) \(Coronavirus\) \(No. 2\) Regulations 2022](#)

[The Modern Slavery Act 2015](#)

[Data Protection Act 2018.](#)

[Charity Commission - Strategy for dealing with safeguarding issues in charities – updated 2017](#)

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>