

# THE QUEEN'S COMMONWEALTH TRUST

## POLICY FOR SAFEGUARDING CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK

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## 1. Introduction

### 1.1. Our work

The Queen's Commonwealth Trust (QCT) champions, funds and connects young leaders who are working hard to change the world. QCT provides three key elements young leaders tell us they need to succeed: flexible funding, practical tools and advice, and access to a global network of like-minded young leaders.

### 1.2. Purpose of this policy

This Safeguarding Policy ('Policy') sets out QCT's commitment and approach to preventing, reporting, and responding to safeguarding incidents. The focus of this policy is to protect children, young people and adults at risk from harm. This Policy is accompanied by QCT's Safeguarding Procedures which sets out in detail how the policy will be implemented.

### 1.3. Statement of commitment

Safeguarding is at the heart of QCT's vision, mission, purpose and values. It is unacceptable for anyone, young or older, to experience abuse or exploitation and safeguarding children, young people and adults. Safeguarding people is everyone's responsibility. QCT is committed to preventing and responding to the harm of those who benefit from our support and assistance. QCT takes a zero-tolerance approach to any form of bullying, harassment, sexual exploitation or abuse committed by those obligated under this policy. QCT fosters a culture of safeguarding where everyone should feel comfortable to challenge behaviour that does not align with this Policy or other QCT policies and feels able to report concerns.

### 1.4. Definitions

**Safeguarding** is when QCT exercises its duty of care by putting in place measures to promote the welfare of children, young people and adults at risk and protects them from harm.

**Abuse** is when a child, young person, or adult at risk is harmed. Abuse may be perpetuated by people who are known to them. Further explanation on types of abuse are provided in QCT's Safeguarding Procedures.

**Children:** the UN Convention on the Rights of the Child (1989) defines a “child” as anyone under 18 years of age, irrespective of the laws and customs in their country of residence. All countries within the Commonwealth have ratified this definition and enacted national legislation to protect all children equally, without discrimination.

**Young people:** QCT works with young people aged 18 - 35 years of age. Young people are considered by QCT to be individuals who are within this age range and will extend similar protection to them.

**Adults at Risk:** An adult is at risk if they require protection or may be in need of protection by reason of factors that may make them vulnerable such as age, illness, mental or other disability, and/or who lives with economic dependence, a conflict environment, or cultural constraints. Being at risk can be a transient state, due to changes in environment, capacity, or resources. Risk may be temporary or more permanent and pervasive.

### 1.5. Who does this policy apply to?

This Policy and Code of Behaviour applies to:

- a. QCT Staff: part-time or full-time employees.
- b. QCT Representatives: including QCT Network members, Trustees, Ambassadors, Advisors, volunteers, interns, consultants and contractors.
- c. QCT Visitors: those who visit QCT-supported work with QCT’s knowledge and consent (including, but not limited to donors, journalists, or supporters), including events held online.
- d. Grant Recipients: includes organisations, their leaders, staff and representatives of recipients of QCT funds who are expected to meet the standards set out in this Policy. Where the term “Grant Recipient representative” is used this refers to Trustees, advisors, volunteers, interns, consultants and contractors of the Grant Recipient.

QCT will apply appropriate disciplinary or other equivalent measures to anyone found in breach of this Policy, the Code of Behaviour and other relevant associated policies.

### 1.6. Laws and standards

The principles in this Policy have been drawn from key international, regional and national instruments. These include the International Standards for Keeping Children Safe<sup>1</sup>, the UN Convention on the Rights of the Child (1989)<sup>2</sup>, the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention)<sup>3</sup> and UK national legislation related to safeguarding<sup>4</sup>. QCT is a UK charity and is required to comply with the requirements of the UK Charity Commission whose guidance is also considered in this Policy.

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<sup>1</sup> [Keeping Children Safe, International Child Safeguarding Standards.](#)

<sup>2</sup> [UN Convention on the Rights of the Child, 1989.](#)

<sup>3</sup> [Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, 2007.](#)

<sup>4</sup> [UK Government, Safeguarding children - detailed information \(updated 18 February 2021\).](#)

## 2. Preventing and reducing the risk of abuse

### 2.1. Working with Grant Recipients

All Grant Recipients are expected to create a positive environment in which safeguarding is prioritised so that children, young people, and adults at risk are protected from harm.

2.1.1. Grant Recipient selection: QCT will only enter into Grant Agreements with those that have, or demonstrate a willingness to adopt, a safeguarding culture that includes prevention and prompt reporting of any incidents or concerns where they have, or may have, occurred. QCT will review Grant Recipients' safeguarding policies, implementation of the policies and procedures for preventing, reporting and responding during the due diligence process before entering into a Grant Agreement and through regular reviews during the time they are grant recipients.

2.1.2. QCT is committed to provide technical advice and support to Grant Recipients to strengthen their capability to develop their own safeguarding policies, procedures and practices to keep people safe.

2.1.3. All Grant Recipients must:

- a. sign their compliance with this QCT Safeguarding Policy through the Grant Agreement;
- b. ensure that safeguarding considerations are part of the programme design and undertake risk assessment and mitigate against risks identified;
- c. have their own safeguarding policy and procedures and share these with QCT. Where a Grant Recipient does not have an existing safeguarding policy and reporting procedure, or in QCT's opinion those in place are not sufficiently robust, QCT will support them to adopt and implement locally the principles of this Policy;
- d. provide details on how they will create a positive reporting culture and how they will respond to safeguarding incidents or concerns;
- e. ensure a means of reporting concerns locally. This applies to both those people in the community with whom a Grant Recipient engages, and those who are in a contractual or voluntary relationship with the Grant Recipient;
- f. agree to report all safeguarding incidents and concerns to QCT's Safeguarding Lead via [safeguardinglead@qct.org.uk](mailto:safeguardinglead@qct.org.uk) immediately when reported to the Grant Recipient. The Grant Recipient should address the safeguarding concern by applying their own safeguarding policy or if that is absent/inadequate, use QCT's policy and procedures; and
- g. agree to undertake and co-operate with investigations into safeguarding concerns.

2.1.4. For all Grant Recipients that QCT intends to have a longer-term working relationship with, QCT will, as part of the due diligence process, undertake a safeguarding assessment to inform the provision of additional safeguarding support.

### 2.2. Human Resources

Safeguarding considerations will be implemented at all stages of the recruitment process of QCT Staff and QCT representatives.

2.2.1. Safe recruitment: QCT operates strict procedures to ensure it recruits only those QCT Staff or QCT Representatives who are suitable to work with children, young people, and adults at risk. Safe recruitment requires that QCT reflects their commitment to safeguarding in all job and contract

advertisements, the interview and selection process and in the strict application of recruitment checks and references, observation during probationary periods and continued performance.

2.2.2. Staff training: Creating a safeguarding culture in which all QCT staff, QCT Representatives, QCT Visitors and Grant Recipients challenge behaviour that increases the risk of harm to children, young people and adults.

2.2.2.1. All new QCT Staff and QCT Representatives will have a mandatory induction within one month of commencing work for QCT that covers the Code of Behaviour, this Policy and related procedures.

2.2.2.2. In addition, all QCT Staff and QCT Representatives will receive subsequent refresher training to be held at least once per year.

### 2.3. Activities and events

2.3.1. QCT will consider safeguarding risks when organising any activity or event, including fundraising, profile raising, networking or other events for QCT or those that QCT engages with or supports. A risk assessment will be conducted for all new activities and events. QCT will ensure appropriate risk mitigations measures are in place.

2.3.2. All those working directly with QCT Staff and QCT Representatives should be made aware of this Safeguarding Policy, the Code of Behaviour and how to report a concern. Safeguarding briefings will be made with all event attendees prior to the event. When working with children, young people, and adults at risk, awareness raising on ways they can keep themselves and their peers safe should be included.

2.3.3. When QCT staff, QCT Representatives and QCT Visitors visit a QCT-supported organisation or activity, in person or remotely, they will ask to see, sign, and abide by the Safeguarding Policy of those responsible for the activities they are observing.

### 2.4. Communications and digital safeguarding

QCT is committed to respecting the rights of children, young people and adults at risk featured in its online communications, the proper handling of data, and enabling a safe online environment for all users. The main principles relating to digital safeguarding include informed consent, privacy protection, responsible use of technology, the provision of trustworthy content and the provision of guidance for staff and user conduct. Refer to QCT's Digital Safeguarding Policy for full details.

## 3. Reporting safeguarding incidents and concerns

3.1. Whoever is notified of a safeguarding incident or concern has an obligation to report. Those making reports of safeguarding incidents or concerns DO NOT need to decide whether abuse has taken place. They DO need to report any information about the safeguarding incident or concern which they identify, or which has been raised with them to QCT. No individual should attempt to deal with a safeguarding incident or concern alone, including investigating the concern themselves.

3.2. Actions taken should follow the principle of the best interest of the child, young person or adult. If a child, young person or adult is at immediate risk of harm or has been seriously injured, immediate action should be taken, such as calling the relevant emergency services. The QCT Safeguarding contacts must be informed once any emergency action has been undertaken.

3.3. Safeguarding incidents and concerns are to be reported to QCT's Safeguarding Lead via confidential email address: [safeguardinglead@qct.org.uk](mailto:safeguardinglead@qct.org.uk). This email is also accessed by QCT's

Safeguarding Trustee and the Board Chair. A Safeguarding Incident Reporting Form is available on the QCT homepage ([www.queenscommonwealthtrust.org/](http://www.queenscommonwealthtrust.org/)) and is accessible to all to report any safeguarding incident or concern.

## 4. Responding to safeguarding incidents or concerns

4.1. The guiding principle in responding to any safeguarding concern is that the protection and welfare of the child, young person or adult at risk is paramount. No child, young person or adult at risk should be put at further risk by any action taken by QCT.

4.2. Safeguarding incident and concern reports will always be acted upon and investigated swiftly. The Safeguarding Lead will ensure that the survivor is kept up to date with the progress of any investigation and provided with feedback at the end of any investigation.

4.3. All parties must maintain confidentiality when managing safeguarding incidents and concerns, on a need-to-know basis.

4.4. QCT is committed to supporting survivors/victims of exploitation, abuse and harassment and all decisions will be risk-assessed and minuted by the QCT Safeguarding Lead in consultation with the Designated Safeguarding Trustee.

## 5. Policy implementation and monitoring

### 5.1. Roles and responsibilities for policy implementation

5.1.1. Safeguarding is the responsibility of all those working or representing QCT. QCT managers and Grant Recipients have the responsibility to ensure that all their staff, representatives, visitors, and partners are made aware of this Policy and associated organisational policies. They should undertake regular safeguarding due diligence processes, risk assessments with mitigating measures to prevent and to respond to harm that may occur in the work supported by QCT.

5.1.2. The Safeguarding Lead is the Chief Executive Officer, who has overall responsibility for ensuring the implementation of this policy and to whom safeguarding incidents and concerns should be reported.

5.1.3. The Board of Trustees ('the Board') has ultimate accountability for safeguarding. The Board must always act in the best interests of those who QCT's work is intended to support and assist. All Trustees will receive training appropriate to their role. A member of the Board has been appointed as the Designated Safeguarding Trustee who chairs the Safeguarding Committee (made up of other Trustees and staff members) which will meet regularly.

### 5.2. Policy monitoring

5.2.1. Safeguarding risks, statistics and updates will be reviewed and assessed every month by the QCT Senior Management Team, every 2 months by the Safeguarding Committee and every six months by the QCT Board. Safeguarding is a standing agenda item at all Board meetings. The Board will receive regularly updates on safeguarding concerns and the outcome within the confines of confidentiality.

5.2.2. QCT will report confidentially annually in the Annual Report on their safeguarding approach, practices, and experience. QCT is committed to reviewing its policy and good practice on an annual basis, or sooner if there is a change in legislation or learning from an incident.

5.2.3. The Board has agreed this Policy and will review it regularly, and as required, to ensure it always remains fit for purpose. Trustees and QCT Staff are responsible to ensure QCT complies with this Policy and for making Safeguarding a priority.

### 5.3. Related policies and documents

This Policy should be implemented in conjunction with QCT's Codes of Behaviour, Safeguarding Procedures and Digital Safeguarding Policy. Other relevant policies to consider include QCT's Staff Handbook.