



Safeguarding policy

Setting out how we approach safeguarding in relation to our staff, volunteers, donors, supporters and those we come into contact with in the course of our activities.

Version: 1.4

Status: Approved by: Board of Trustees

Approval date: 13 March 2023

Version history

Version	Date issued	Brief summary of change	Author
1	March 2020	New policy	Robert Duffton
2	March 2021	Virtual events	Robert Duffton
3	March 2022	Online activity	Robert Duffton
4	March 2023	Board reporting	Robert Duffton
Policy author			© 2020 SAFEcic, all rights reserved
Policy owner			Board of Trustees
Team			Board of Trustees
Applies to (audience):			MEC trustees, staff, volunteers
Document reviewer			Lead trustee for safeguarding
Responsible committee/group for approval			Board of Trustees
Date of next formal review			March 2024

Purpose

All personnel, including Trustees, staff, volunteers, associates, contractors, freelancers, students, and those working, on work experience or volunteering for us, will be given a summary and access to this full policy upon appointment, and thereafter annually. They will sign to confirm that they understand and comply with MEC's safeguarding arrangements. Failure to comply will be considered a disciplinary matter and be dealt with accordingly.

It is important to note that all personnel from the UCL Institute of Ophthalmology and Moorfields Eye Hospital are required to follow their employers' safeguarding policies. All such personnel are also safely recruited by their employer with all relevant professional and criminal records checks carried out, and will follow professional working practices as dictated by their relevant regulatory authorities.

No MEC personnel work directly with at risk groups in regulated activity at any time.

1. Policy statement

MEC upholds the belief that the welfare of all children, young people and adults at risk is of paramount importance, regardless of their age, ability, culture, disability, gender assignment, sexual orientation, race, religion or belief.

MEC is committed to ensuring that everyone, individuals and organisations, who are involved with the Charity, are clear about their roles and responsibilities. The Charity will actively promote the welfare of all children, young people and adults at risk by working to the best possible safeguarding standards at all times.

As a registered charity, MEC has appropriate arrangements in place to safeguard and protect children, young people and adults at risk from harm as legislated for in England and Wales; these are outlined in this policy.

The Trustees have a shared responsibility for ensuring that those benefiting from, or working with, the Charity, are not harmed in any way through contact with it. The Charity has a zero tolerance policy for any abusive or harassing behaviour across all its activities.

The Charity is clear that this policy must be strictly adhered to by all personnel.

2. Legal framework

This policy is developed in line with the under-pinning key legislation, government and statutory guidance across England and Wales (Appendix 5). The key principle is that safeguarding is everyone's responsibility and each individual and organisation should play their full part; and have a child-centred and adult focused approach.

2.1. Children and Young People

Safeguarding and Promoting the welfare of children and young people is:

- 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.

2.2. Adults at Risk

The aims of adult safeguarding is:

- preventing harm and reducing the risk of abuse or neglect to adults with care and support needs;
- stopping abuse or neglect where possible;
- safeguarding adults in a way that supports them in making choices and having control about how they want to live.

3. Definitions

For the purpose of this policy:

A child is any person under the age of 18 years

An adult at risk is defined as:

- having needs for care and support, and;
- experiencing, or being at risk of, abuse and neglect and;
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

“All Personnel” refers to:

Trustees, staff, volunteers, associates, contractors, freelancers, students, and those working, on work experience or volunteering for us.

4. Named persons for safeguarding

	Named Trustee for Safeguarding	Safeguarding Adviser	MEC Lead for Safeguarding	MEC Deputies for Safeguarding	
Name:	Rob Jones	None	Robert Dufton	Gordon Burns	Jo Green
Job role	Trustee		Chief executive	Director of finance and resources	Head of Fundraising and Engagement
Tel:	07889721663		07986 544410	07808 613649	07973297786
Email:	robjones3@gmail.com		r.dufton@nhs.net	gordon.burns1@nhs.net	holly.hollis@nhs.net

5. Responsibilities of the named persons for safeguarding

5.1. The named Trustee for safeguarding supported by the MEC Management Team will with the support of any Safeguarding adviser:

- make sure MEC is aware of the relevant Charity Commission's guidance documents;
- oversee the annual review of all safeguarding arrangements for MEC or when legislation changes;
- ensure safeguarding is a shared responsibility and a standing agenda item for Trustees' meetings;
- ensure any needs for resources are considered by all trustees to maintain robust standards of safeguarding across MEC;
- liaise with, and support, the Lead and Deputy(s) for safeguarding with regards to any issues arising around personnel or the MEC's operations;
- ensure the Chief executive, on behalf of the Chair of Trustees, reports any serious incidents or events, where any beneficiaries, staff, volunteers, personnel, services, assets or reputation have been harmed; to the Audit and risk committee and to the Board and to the Charity Commission for England and Wales or OSCR immediately they come to light. This should be actioned in line with the MEC's Serious Incident Reporting Policy (in development).
- treat and handle safeguarding information securely at all times, when storing, sharing and accessing the information. The access and sharing of safeguarding information must be on a strict need to know basis, refer to the Data Protection Policy.
- maintain confidentiality at all times, sharing information only with those who need to know in able to respond or consider actions. Confidentiality should not be breached with family and friends.

5.2. The Charity's Lead and Deputies for safeguarding will:

- be known to all personnel and have contact details available;
- be readily accessible by phone to all personnel during office hours or where events are happening during evenings or weekends;
- listen and offer advice and support to all personnel when needed;
- maintain current training certificates and keep up to date with their legal safeguarding duties;
- ensure this policy is kept up to date;
- prepare an overview safeguarding report for the Named Trustee for safeguarding annually and as a standing item on the CEO's report to each Trustees' meeting;
- monitor and review any safeguarding concerns about any of the MEC's activities, personnel and venues;
- annually review and stress test this policy, or more often if serious incidents occur;
- liaise with external statutory agencies as required;

- oversee an annual review of a training and job role analysis to ensure safeguarding training is delivered and certificated for all personnel as relevant;
- liaise with external statutory agencies regarding any allegations or complaints against personnel, or when safeguarding issues may attract media attention or litigation;
- treat and handle safeguarding information securely at all times, when storing, sharing and accessing the information. The access and sharing of safeguarding information must be on a strict need to know basis refer to the Data Protection Policy;
- maintain confidentiality at all times, including family and friends;
- ensure personnel report and record any safeguarding within MEC appropriately on the MEC's safeguarding concern form (see appendix 6 and 7), on the same working day, factually, timed, dated & signed, including job role;
- refer any welfare concerns regarding children, young people or adults at risk within MEC to the agencies available in the local authority area, Social Care Services or the police on 101 (in the case of an emergency, or if it is felt someone is in immediate danger, dial 999);
- in the cases of when personnel have referred a safeguarding concern to a setting, contact the setting's Lead for safeguarding for reassurance that appropriate steps have been taken. No identifying details should be shared;
- for all concerns, record what was discussed and include a chronology of which external statutory agencies the matter has been referred to and any actions agreed; including when it is decided not to make a referral (see safeguarding concern recording form in appendix vi and vii);
- confirm any referral in writing within 24 hours, in the secure and encrypted format requested by the agency, including a copy of the safeguarding concern form;
- co-operate with any subsequent requests for information or action from any agencies;
- use MEC's secure system to store all records for the reference of the Trustee for Safeguarding, any Safeguarding Adviser, Lead and Deputy as appropriate;

5.3. Safeguarding concerns within Moorfields (MEH) or UCL Institute of Ophthalmology (UCL)

- ensure personnel know they need to be informed if they have had to report a concern within MEH or UCL to their Lead or Deputy for Safeguarding. There is no need to record any personal details of anyone concerned.
- co-operate with any subsequent requests for information or action from any agencies;
- use MEC secure system to store all records for the reference of the Lead and Deputy as appropriate;

5.4. In all cases:

- treat and handle safeguarding information securely at all times, when storing, sharing and accessing the information. The access and sharing of safeguarding information must be on a strict need to know basis, refer to the Data Protection Policy LINK
- maintain confidentiality at all times, sharing information only with those who need to know in able to respond or consider actions. Confidentiality should not be breached with family and friends.

6. Code of Conduct

6.1.1. Regardless of role, all charity personnel will work to the highest standards of safeguarding practice, taking into account any specific issues listed below which are included in their work.

6.1.2. All charity personnel will:

- be responsible and accountable for their words and actions at all times.
- have appropriate authority to act or commit MEC in what they write, say or e-mail to others.
- take responsibility for their actions and get their job done
- have a spirit of enquiry and openness
- recognise, value and acknowledge difference
- challenge the ideas or action – not the person, and challenge carefully in a way that can be heard and mirroring how they would like to be treated.
- keep their private lives and professional relationships with beneficiaries and the public separate, including when using social media;
- neither give or accept any gifts in line with MEC's Ethical conduct Policy.
- report all gifts to the relevant line manager in line with MEC's Ethical Conduct Policy;
- only take pictures of people with the written permission of the setting or, for individual children under 16 years or adults who may lack capacity, refer to Media Storage Policy (in development) and MEC Photography and filming consent form;
- speak with their line manager if they consider their work may put them into a position that might lead to an allegation of professional misconduct;
- report any safeguarding concerns at the UCL Institute of Ophthalmology or Moorfields to the Lead or Deputy for the relevant organisation and inform the Charity's Lead for safeguarding that they have raised such a concern,
- in very rare circumstances, if referring to the Lead or Deputy for either organisation would put someone at further risk, will refer to the Charity's Lead for safeguarding instead
- report any safeguarding concerns about the behaviour of any Charity personnel to the Charity's Lead for safeguarding without delay;
- treat and handle safeguarding information securely at all times, when storing, sharing and accessing the information. The access and sharing of safeguarding information must be on a strict need to know basis refer to the Data Protection Policy and the IT Communications Policy (in development);

- exercise their right to whistleblow if they are concerned safeguarding issues are being mismanaged or ignored within the Charity (MEC Whistleblowing Policy);
- maintain confidentiality at all times, sharing information only with those who need to know in able to respond or consider actions. Confidentiality should not be breached with family and friends.

7. What is Abuse?

Abuse of a child, young person or adult at risk can take many forms (see **appendix 1**).

8. Mental Capacity

The primary purpose of mental capacity legislation is to promote and safeguard decision-making within a legal framework. There is a presumption of capacity – every adult has the right to make his or her own decisions and must be assumed to have capacity to do so unless it is proved otherwise. This means that no assumption can be made that someone cannot make a decision for themselves just because they have a particular medical condition or disability.

It is a criminal offence for anyone to knowingly ill-treat or wilfully neglect a person who lacks capacity.

9. Confidentiality, Consent and Information Sharing

The Charity is mindful of its legal duties under the Data Protection Act 2018 and General Data Protection Regulation (GDPR) Data Protection Policy LINK . Personal information about children, young people, adults at risk and their families will usually be confidential and should not be disclosed to a third party without the consent of the subject.

However, the law allows for the disclosure of confidential information where this is necessary to safeguard a child, young person or adult at risk; or if a crime has or may have been committed, or it is in the public interest.

Disclosure of confidential information must be justifiable, according to the particular facts of the case and must be limited to those people who need to know in order to take appropriate action.

All safeguarding records of concern for children, young people and adults at risk are kept for 10 years or, in the cases of children or young people, until s/he is 25 years old whichever is the longer.

10. Whistleblowing and Serious Incidents

All personnel will know how to “whistleblow” externally if they have concerns that the Charity is not addressing safeguarding issues appropriately or they feel unable to raise the matter internally. They can do this by:

- referring directly to Social Care Services, or the Police if a crime has, or may have been committed;
- referring to the Charity Commission for England and Wales by email whistleblowing@charitycommission.gov.uk
- referring to the Whistleblowing Helpline for the NHS 08000 724725

- referring to the Care Quality Commission (CQC) 03000 616161 enquiries@cqc.org.uk

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant harm to the charity's beneficiaries, staff, volunteers or others who come into contact with the charity through its work:

- loss of the charity's money or assets
- damage to the charity's property
- harm to the charity's work or reputation

All serious incidents should be reported by the Chief executive using the Charity Commission's online report form

11. Responding to safeguarding concerns

Appendix 2 sets out a flow chart giving guidance on how to respond.

12. Responding to eSafety concerns

Appendix 3 sets out a flow chart giving guidance on how to respond.

13. Recruitment

The Charity has robust procedures in place for recruitment

14. Activities where safeguarding needs to be considered

14.1. Visiting and meeting patients at Moorfields and UCL Institute of Ophthalmology

The Charity works extensively at Moorfields: meeting patients, supporters and donors. All personnel should:

- wear official ID at all times
- observe the setting's code of dress and infection control measures at all times
- know who the setting's Lead and Deputy for safeguarding is
- be mindful of confidentiality, particularly with regards to medical issues
- only visit clinical areas with the setting's permission, in the presence of staff and never enter any single patient's rooms or location where the patient is undergoing treatment or a consultation
- avoid helping any patients with drinking, eating or other care
- be clear about their role and status when giving advice or signposting to other services
- be aware that some people they come into contact with may be experiencing difficult issues, both medically and emotionally
- know how to deal with any possible safeguarding disclosures LINK in policy
- speak with their line manager if they need support with some of the difficult situations they may encounter

14.2. Grant funding

- Grant funding is awarded to individuals, administering host institutions (primarily Higher Education Institutions (HEIs) or NHS foundation trusts), commercial or social enterprises. Where a grant is awarded to an individual, they will be an employee of either Moorfields Eye Hospital or UCL and be expected to comply with their employers safeguarding policies.
- If any safeguarding concerns arise about any grantees, the issue would be reported to their host organisation's Lead for safeguarding and followed up by the Charity's lead for safeguarding to seek assurance that the concern is being managed appropriately.

14.3. Photography and media

- No photography or video will be taken of individual or small groups of children, young people or members of the public without advising the subjects, parents or carers of the purposes of such images and seeking written signed consent with the MEC Photography and filming consent form from the responsible parent (for children 16 and under).
- In the case of any adult who lacks capacity, or appears to lack capacity, it is for the accompanying carer to advise and agree if any filming can take place as they have already been entrusted to look after the adult at the time. (It is good practice to ensure the child or adult has the opportunity to express their own views.)
- Public crowd photography will not be taken unless there is prominent signage by the entrance to the venue, and at the location where filming is taking place, detailing the purpose of such imagery and giving people the option to opt out.
- Encrypted MEC devices or encrypted equipment should be used, not personal devices, phones or cameras. Where personal devices are used data should be transferred as soon as practically possible and deleted.
- A MEC photographer will be commissioned when carrying out professional photography or filming and will be accompanied by a MEC member of staff at all times.
- All official press and other photographers will sign in with their official ID being shown.
- No pictures of individual or small groups of children, young people or any members of the public will be published in any medium in a way that their names can be identified; (refer to the MEC Media Capture and Storage Policy (in development) for further guidance).
- No images of any one in a state of undress will be taken.
- All images will be taken in open public accessible areas or with staff present.
- All images will be uploaded onto MEC'S secure storage and deleted from any mobile device within two days.
- Any unused images will be deleted, due to lack of quality, within 2 days.

- Images will be kept for a maximum of 2 years in line with the Charity's Data Retention Policy for Photographs and Videos.
- See Media Capture and Storage Policy (in development) for further information

14.4. Home working

In addition to the Lone Working Policy, the following points should be observed:

- No meetings should be held at home, it is normally appropriate to hold meetings at the relevant setting or the MEC office
- All works documents should be stored on MEC's secure systems, accessible through remote access provided.
- No personal contact details other than work mobile numbers should ever be shared with any patients
- All staff working at home alone will be given personal safety information e.g. [Suzy Lamplugh Trust leaflets](#)

14.5. One to one, lone and sole working

From time to time some staff and volunteers may be required to work by themselves for significant periods of time without close or direct supervision in the community or in isolated work areas. This will include visiting potential donors; working from home; attending events, conferences or other visits. All such work should be carried out in line with the Charity's Lone Working Policy [LINK](#)

- Under no circumstances should any personnel transport a young person or an adult at risk in their own vehicle
- Those who visit sites and organisations alone should be mindful of their own safety and only when the setting has been risked assessed.
- All staff who work alone will be given personal safety information e.g. Suzy Lamplugh Trust leaflets

14.5.1. Making home visits

Occasionally it is necessary to meet donors or potential donors in their own homes. The Charity is careful to ensure personnel:

- observe the solo and lone working points above
- only visit people's homes where there is no practical alternative for reasons of illness, fragility, lack of mobility
- hold such meetings during office hours and not at night or during weekends
- obtain written permission from their line manager detailing the name, address, purpose for visit, date and expected times of arrival and departure
- arrange a "buddy" system to check in with after the visit (for example with a line manager) to confirm their safe arrival home or back at the office

- carry ID, with the Charity details for the donor to check, if needed, to give assurance they are who they say they are

All staff who make home visits will be given personal safety information e.g. [Suzy Lamplugh Trust leaflets](#)

Personnel may become concerned about:

- the health and safety of the home, especially with young children or disabled people
- very young children or disabled people being left home alone
- the attitudes of adults within the household
- dangerous pets particularly when there are very young children in the household

It is important that personnel:

- do not visit the home if any children or young people under 18 are there alone
- **If no responsible adult is present and there is an unsupervised child (under 5), or a very disabled person, dial 999 and stay outside the door until help arrives**
- be polite and friendly but do not forge relationships or show favouritism
- avoid physical contact unless absolutely necessary e.g. when a someone is injured and there is an emergency
- meet in a shared living area e.g. kitchen or sitting room
- make excuses to leave if they have any safeguarding concerns and ring the Lead for safeguarding when they have left the area

14.6. Children, young people and adults at risk working or volunteering in the charity

Currently there are no under 18s or adults at risk involved with the charity, if this changes this policy will be updated to reflect this.

15. Fundraising, donors and membership

The Charity adheres to the “Code of Fundraising Practice 2019” and the Charity Commission's (England & Wales) guidance “Charity fundraising: a guide to trustees' duties”; the OSCR Fundraising Guidance (Scotland) and ensures that:

- all activities carried out in relation to fundraising and membership are done so in a legal, open, honest, accountable, transparent, respectful and fair approach;
- no pressure is used to obtain donations or membership;
- the Charity's Privacy Policy [LINK](#) is followed at all times.
- a current in-patient receiving treatment at the hospital (who is considered an adult at risk by law) cannot enter into any agreements about donations until they are discharged

With regards to donors and members, payments are made via bank accounts and/or legacies, so mental capacity may be presumed as they have control of their own finances.

If MEC is contacted by an individual who can evidence they have Power of Attorney over a donor's or member's financial affairs at the time of any payment, the situation will be assessed by the Director of development who will ensure that the donation or membership fee is returned, the Data Protection Officer informed, and the details of the donor or member deleted from the

database. The Charity will not continue to fundraise from, or market to, anyone in those circumstances.

Only existing MEC direct contacts are eMailed with their consent, and they all have a right to opt out at any time

15.1. Fundraising Events

Where fundraising events are in partnership with specialist events management teams, partners are responsible for their own insurance, organisational safeguarding and Health & Safety arrangements.

Where MEC organises such events managers will ensure:

- public events for over 200 persons which have regulated entertainment requires a Temporary Event Notice or a Premises Licence from the Local Authority.
- all events require a completed Health & Safety risk assessment and where applicable completion of a Safety Management Plan.
- a detailed event risk assessment will be carried out to cover particular safeguarding issues including adult child ratios, managing children's behaviour, coping with medical and other emergencies, photography, children who are found or go missing, one to one working, supervision of toilets and changing rooms.
- all personnel will be fully briefed about all relevant major incident and safeguarding arrangements for the event.
- any public ticketed event that involves young performers under 18 years will need chaperones present.
- no children under 16 will attend such events unaccompanied by a responsible adult who will be expected to take responsibility for the welfare of their child/ren other than any First Aid if needed.
- if a major incident arises it is the responsibility of managers to ensure all personnel will follow the Safety Management Plan

15.2. Virtual fundraising events

Where virtual fundraising events are in partnership with specialist events management teams, partners are responsible for their own insurance, organisational safeguarding and Health & Safety arrangements.

Where MEC organises virtual fundraising events, in addition to the requirements for fundraising events generally (as set out in paragraph 15.1) managers will ensure:

- -If children are attending, to make sure the content of the event is age appropriate. Written parental consent must be provided pre-event for any under 18s who will be attending without their parent or other responsible adult.
- -The event manager is responsible for removing anyone during the event who says or does anything inappropriate or offensive with immediate effect.

- -The event manager is responsible for monitoring the chat function during the event and should remove any offensive or inappropriate material with immediate effect. Personal details of attendees should not be shared in the chat function and should also be removed.
- -If the event is going to be recorded, attendees must be informed of this at the start of the event during the housekeeping and informed they can turn off their camera if they wish
- -Photography/screenshots of the event needs to be considered pre-event. If photography/screenshots are to take place that include participants, photography consent will need to be given by the attendees which must be collected prior to the event.

15.3. Online activity and services

The charity has control over its website and social media accounts, and only designated and trained staff can make alterations to the website or post on social media. Staff are required to comply with the charity's social media policy.

No online services are provided which permit discussion between users. People can comment and interact on social media. We monitor social media comments in accordance with the social media policy.

What is Abuse?

1. Children and Young People

Physical Abuse:

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing significant harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse:

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone; may feature age or developmentally inappropriate expectations being imposed on children.

Sexual Abuse:

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect:

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment;
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Other issues that may involve or give rise to abuse include:

- **Children under 16 years old living away from home** with someone who is not a close relative. If this happens for more than 28 days, their parent/carer (or anyone else if this has not been done, or not possible) need to register the private fostering arrangements with the local authority.
- **Children going missing** from home, for whatever reason, as they may be exploited or trafficked.
- **Young unaccompanied asylum seekers** who have no responsible adults with them.
- **Peer abuse** including bullying as children can be abusers too.
- **Radicalisation** - some people may be vulnerable to being drawn into terrorism if they lack self-esteem or are victims of bullying or discrimination. Indicators of this can be hard to recognise in both children and adults and may include: isolating themselves from family and friends, talking as if from a scripted speech, unwillingness or inability to discuss their views, a sudden disrespectful attitude towards others, increased levels of anger and /or an increased secretiveness, especially around internet use.
- **Violent extremism** is when groups or individuals who condone violence as a means to a political end is a particular risk for some children. Any concerns should be reported.
- **Sexual exploitation** - Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.
- **Female genital mutilation** - FGM is a criminal offence – it is child abuse and a form of violence against women and girls, and therefore should be treated as such. FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.
- **Forced marriage** - Forced marriage is a criminal offence – it is a form of child/ adult/ domestic abuse and has to be treated as such; ignoring the needs of victims should never be an option. Forced marriage affects people from many communities and cultures, so cases should always be addressed using all of your existing structures, policies and

procedures designed to safeguard children, adults with support needs and victims of domestic abuse.

- **Concealed pregnancy** when a mother of any age does not seek medical help or support so the unborn baby may be at risk of harm as a result of not accessing maternity services.
- **Child trafficking** - Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Trafficked children may not only be deprived of their rights to health care and freedom from exploitation and abuse, but may also be denied access to education.
- **eSafety** - when children, young people or adults at risk may be targeted online for sexual abuse, financial gain, radicalisation and / or other crimes;
- **Domestic violence** when an individual exercises control over another in an intimate or family relationship. It takes many forms and can include neglect, physical, sexual, financial, property and / or emotional abuse.
- **Coercive behaviour** in the family or in a person's intimate relationships is a criminal offence. Controlling or coercive behaviour does not relate to a single incident, it is a purposeful pattern of behaviour which takes place over time in order for one individual to exert power, control or coercion over another. It is a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.
- **Modern slavery** - Modern slavery is a complex crime that takes a number of different forms. It encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. Victims may be sexually exploited, forced to work for little or no pay or forced to commit criminal activities against their will. Victims are often pressured into debt-bondage and are likely to be fearful of those who exploit them, who will often threaten and abuse victims and their families. All of these factors make it very difficult for victims to escape.
- **Child abuse linked to faith or belief** which includes belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray. It includes neglect, physical, sexual and/or or emotional abuse.
- **County lines** is when gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, use dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

2. Adults at Risk

Abuse is defined as a violation of an individual's human and civil rights by another person or persons. It may involve a single or repeated act or omission occurring within a personal or professional relationship where there is an expectation of trust which causes harm to an adult at risk.

Significant harm includes:

- Ill treatment (including sexual abuse and forms of ill treatment that are not physical);
- The impairment of, or an avoidable deterioration in, physical or mental health;
- The impairment of physical, emotional, social or behavioral development.

Behaviours Include:

- **Physical Abuse:** Hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- **Sexual Abuse:** Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological Abuse:** Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or Material Abuse:** Theft, fraud, exploitation, pressure in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. It can be online, by phone or face to face.
- **Neglect or Acts of Omission:** Ignoring medical or physical care needs, failing to provide access to appropriate health, social care, welfare benefits or educational services, withholding the necessities of life such as medication, adequate nutrition and heating.
- **Discriminatory Abuse:** Racism, sexism or acts based on a person's disability, age or sexual orientation. It also includes other forms of harassment, slurs or similar treatment such as disability hate crime.
- **Domestic Abuse:** Psychological, physical, sexual, financial, emotional abuse, coercive behaviour in the family or intimate relationships, and so called 'honour' based violence.
- **Organisational Abuse:** Neglect and poor care practice within a care setting such as a hospital or care home or in relation to care provided in someone's own home ranging from one off incidents to on-going ill-treatment. It can be neglect or poor practice as a result of the structure, policies, processes and practices within a care setting.
- **Modern Slavery:** Encompassing slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to

coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment;

- **Self-Neglect:** Covers a wide range of behaviour including neglecting to care for one's personal hygiene, health or surroundings and behaviour such as hoarding.
- **Hate and "Mate" Crime:** A form of hate crime in which an "at risk" person is manipulated or abused by someone they believed to be their friend.
- **Forced Marriage:** When one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

This page has been intentionally left blank.

Responding to Child and Adult Safeguarding Concerns

1. Personnel may become concerned by:

- their own observations and concerns;
- being told by another person that they have concerns;
- what the child or adult says;
- what others say;
- a complaint (including anonymous) from the public.

2. Handling Disclosures

A disclosure may be made verbally or by the behaviour of a child, young person or an adult at risk and it is important for everyone to remember the following:

- Keep calm;
- Reassure the child or adult;
- Consider who else can hear;
- Listen carefully;
- Do not ask leading questions or promise confidentiality
- To factually record the child/adult's words as accurately as possible, on the safeguarding concern form and on the same day (see appendix 6 and 7); timed, dated & signed, including jobrole.

Important: When there are safeguarding concerns about a child, young person or adult at risk the personnel with the concern will immediately assess if the person is currently safe and, in an emergency or, if it is felt someone is in immediate danger, 999 should always be dialed.

3. Actions to be Taken

If a member of personnel has a concern, they will:

- inform their Lead for safeguarding OR Moorfields' or UCL Institute of Ophthalmology's Lead or Deputy for safeguarding without delay; then inform the MEC Lead for safeguarding that they have raised a concern (but do not share exact details)
- not investigate;
- preserve any evidence (if relevant);
- factually record their concerns in writing as soon as possible, on the same day, on the Charity's OR Moorfields' or UCL Institute of Ophthalmology's safeguarding concern form, co-operate with any following requests for action from the Lead for safeguarding or external statutory agencies. These records will include name, job role and be timed, dated and signed;
- maintain confidentiality at all times, including with colleagues, family and friends.

Important: The reliance the court will place upon the information obtained from the people involved (particularly from the victim) may be reduced if it is known that someone has discussed the issues with the child or adult outside the normal investigation process.

Step One

You are worried a child or adult at risk has been abused, or is at risk of harm, because:

- You have seen something
- A child or adult says they have been abused
- Somebody else has told you they are concerned
- There has been an allegation against a colleague
- There has been an anonymous allegation
- An adult has disclosed that they were abused as a child
- An adult has disclosed that they are abusing a child or adult



If your concern is about MEC:

**If your concern is about UCL Institute of Ophthalmology
OR Moorfields:**



Step Two

Refer to MEC's Lead for safeguarding, unless they are implicated, in which case contact the Deputy for safeguarding. Record the details on the MEC's safeguarding concern form [See appendix link here](#)

Step Two

Refer to UCL's or Moorfields' Lead for safeguarding*
Record the details on UCL's or Moorfields' safeguarding concern form.
Inform MEC's Lead for safeguarding that you have referred a concern. There is no need to use any identifying details.
*If you feel that a referral to UCL or Moorfields' may put someone at further risk you should refer to MEC's Lead for safeguarding without delay.



Step Three

MEC's Lead or Deputy for safeguarding will refer the concern to local Social Care Services and/or the Police (MASH, Multi-Agency Safeguarding Hub in some areas) and follow up the referral in writing within 24 hours by secure email. In cases of allegations against a person with a "duty of care", the Local Authority Designated Officer (LADO, child abuse allegations in England only) or Social Care Services will co-ordinate the next procedural steps. Contacts can be found with the [NHS App](#)

Step Three

MEC's Lead for safeguarding will contact UCL's or Moorfields' Lead for safeguarding to check the matter is being dealt with appropriately, there is no need to know individual details

At all steps: Consult, Monitor and Record (Sign/Date/Time Include name and role)
Any consultations should not delay a referral.

Under "whistleblowing", anyone can refer directly to the police, Social Care Services or the Charity Commission (England & Wales) whistleblowing@charitycommission.gsi.gov.uk or the Care Quality Commission (CQC) for concerns in health settings 03000 61616 enquiries@cqc.org.uk if, in good faith, they are concerned safeguarding concerns are not being managed appropriately.

In an emergency, do not delay: Dial 999

Responding to eSafety concerns

1. Safeguarding and modern technology.

All Safeguarding concerns will be dealt with in line with this policy, particularly in terms of referral and recording procedures.

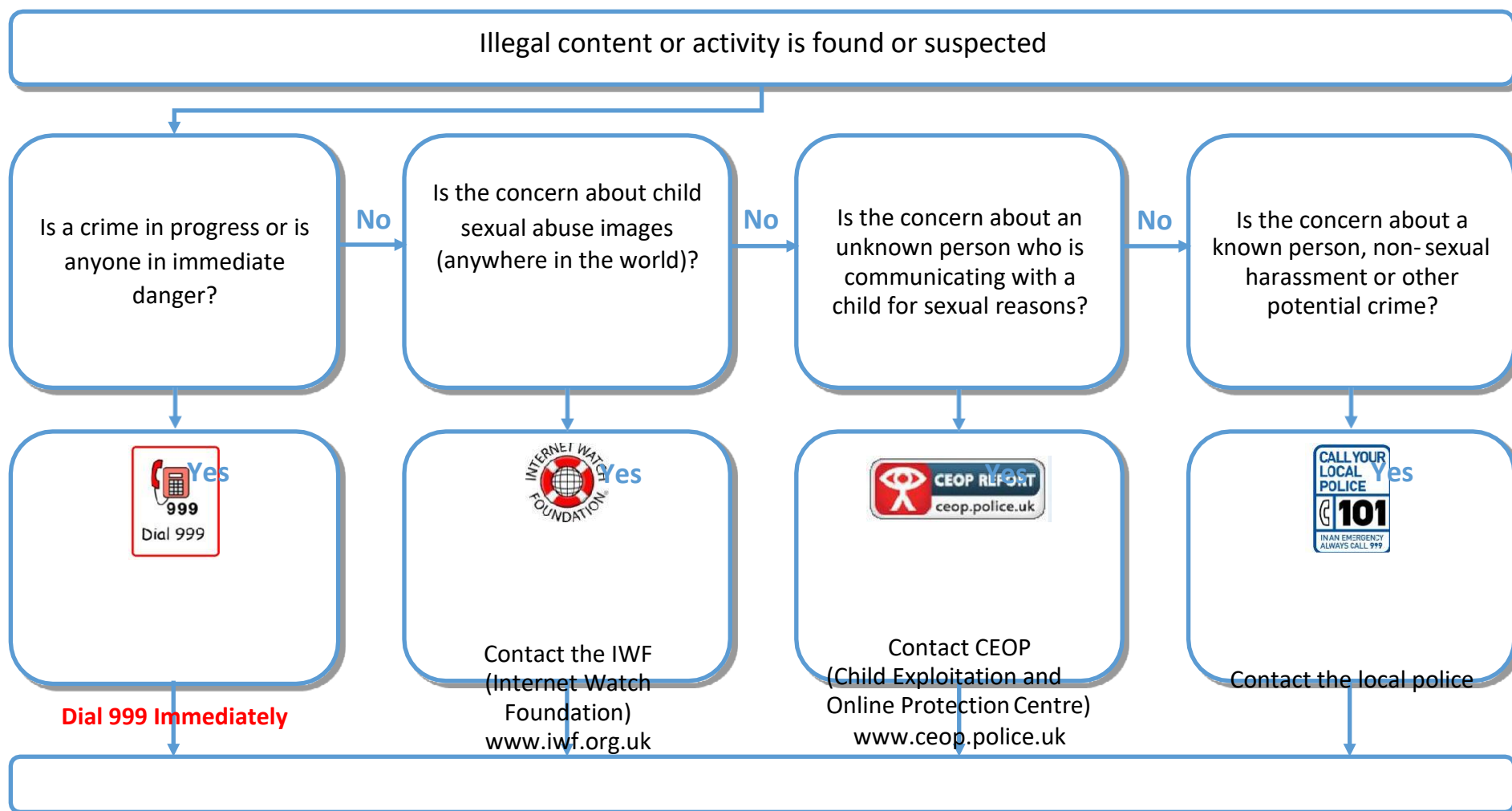
2. All members of personnel will:

- act professionally and within the law at all times;
- only interact with “at risk” groups with whom they come into contact at work via official MEC media, not personal;
- report any concerns without delay in line with the [eSafety concerns: flowchart for referral](#) and then notify the Lead for safeguarding of their concerns and actions without delay;
- record their concerns and actions on the safeguarding concern form (see [appendix vi](#)); and
- ensure it is timed, dated and signed, including job role.

3. Examples of things that may give cause for concern may include a member of personnel who:

- befriends or communicates with members of the public or beneficiaries with whom they work; especially children, young people and adults at risk, by their personal phone, online, by messaging and social media etc.;
- is secretive about what they are doing and who they are meeting;
- takes images of Charity’s activities with their own phone or pad without permission of their line manager;
- does not adhere to the Media Capture and Storage Policy LINK
- constantly clears their browser history;
- views adult pornography at work;
- views child sexual abuse images at any time;
- promotes discrimination, illegal acts or racial or religious hatred of any kind;
- shares confidential or sensitive information with others who are not authorised to know;
- circulates or messages any information which may be offensive

Flowchart for referral



Inform the Charity's Lead or Deputy for Safeguarding who will liaise, await response, and review eSafety arrangements as necessary.

Safeguarding allegations and complaints against charity personnel

When there is a safeguarding concern, complaint or allegation about the behaviour of any member of personnel in the charity, it should be reported to the Lead for safeguarding (or the Deputy if the Lead for safeguarding is unavailable or implicated). They will directly contact:

- for allegations of child abuse in England only: the Local Authority Designated Officer (LADO) who will co-ordinate the next steps;
- for adults and children across all countries: child or adult Social Care Services (who are in MASH in some areas) who will co-ordinate the next steps;
- in the case of an emergency, or if it is felt someone is in immediate danger, the Police will be contacted on 999.

The Lead for safeguarding(or Deputy, if the Lead for safeguarding is unavailable or implicated in any way) will:

- ensure the person with the direct concern has factually recorded their concerns in writing and on the same day on the Charity's safeguarding concern form; timed, dated & signed, including job role;
- maintain an accurate chronology of all discussions held and actions taken;
- attend multi-agency meetings to discuss the case if requested;
- co-operate with any police investigation.

The HR Team will

- adhere to the LADO's (for child allegations in England only) or Social Care Services' and/or police advice;
- consider possible suspension of the individual;
- offer appropriate support for that individual, external or internal,
- only carry out investigations or disciplinary procedures with the permission of the LADO, Social Care Services and /or police
- Please note, if job roles within MEC became eligible for enhanced DBS checks, we will review this policy immediately

Personnel Records held by the HR Team

Details of allegations that are found to have been malicious should be removed from personnel records.

However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate.

It will provide clarification in cases where any future criminal records checks reveal information from the police about an allegation that did not result in a criminal conviction, and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

All records, other than those when the outcome is an unfounded allegation, should be retained for a minimum of 10 years from the date of the allegation or until normal retirement age, whichever is the longer.

Appendices

Legal Framework: Legislation and Guidance Overview

Legislation: Child and Adult Safeguarding	
Description	
<i>Job applicants to disclose “spent” convictions for eligible positions such as direct, regular work with children</i>	Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, as amended.
<i>To make provision in connection with the protection of children and vulnerable adults with regard to Disclosure and Barring</i>	Safeguarding Vulnerable Groups Act 2006
<i>Sexual exploitation and sexual offences</i>	Serious Crime Act 2015 Part 5 (all) Sexual Offences Act 2003 The Female Genital Mutilation Act 2003
<i>Protect individuals who make certain disclosures of information in the public interest; to allow such individuals to bring action in respect of victimisation; and for connected purposes.</i>	Public Interest Disclosure Act 1998
<i>Acts to give further effect to rights and freedoms guaranteed under the European Convention on Human Rights</i>	Human Rights Act 1998
<i>Make provision for the disclosure of information held by public authorities or by persons providing services for them</i>	Freedom of Information Act 2000
<i>The regulation of the processing of information relating to individuals, including the obtaining, holding, use or disclosure of such information.</i>	Data Protection Act 2018
Legislation: Child Safeguarding Only	
Description	
<i>Overarching children legislation bringing together earlier acts including; duty to investigate, cooperation between agencies and the need for a plan to safeguard a child.</i>	Children Act 1989

<i>The welfare of children is paramount.</i>	
<i>The setting up of boards/ partnerships to ensure agencies work together to safeguarding of children, with up to date, relevant policies and procedures and training</i>	Children Act 2004 Section 11 Children and Social Work Act 2017
Legislation: Adult Safeguarding Only	
Description	
<i>To make provision for those who lack capacity to manage welfare, finance and health</i>	Mental Capacity Act 2005 Amendment to the above Act regarding: Deprivation of Liberty Safeguards (DoL's) <i>These are used if a person is to be deprived of their liberty in a care home or hospital.</i> Mental Capacity (Amendment) Bill 2019 <i>Introduces Liberty Protection Safeguards for over 16s, due later 2020</i>
Guidance: Child Safeguarding Only	
Description	
<i>How Agencies act and cooperate to safeguard children</i>	Statutory Working Together to Safeguard Children 2018, updated 2019
<i>Duty to refer child abuse concerns and co-operate</i>	What to do if you're worried a child is being abused 2015
Guidance: Adult Safeguarding Only	
Description	
<i>To improve safeguarding arrangements for adults who are at risk of harm from abuse, exploitation or neglect</i>	Care and support statutory guidance 2018
Charity Commission Guidance (England and Wales)	
<i>Relevant guidance issued to charities by the Charity Commission</i>	<ul style="list-style-type: none"> • 10 actions trustee boards need to take to ensure good safeguarding governance • Charity fundraising: a guide to trustee duties 2016 • Strategy for dealing with safeguarding issues in charities 2017

	<ul style="list-style-type: none">• Regulatory alert to charities - safeguarding <i>19 December 2017</i>• Regulatory and risk framework <i>2018</i>• Charities: how to protect children and adults at risk <i>2018</i>• Actions to tackle exploitation and abuse agreed with UK charities <i>2018</i>• Safeguarding and protecting people for charities and trustees guidance <i>2019</i>• Safeguarding for charities and trustees <i>2021</i>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

This page has been intentionally left blank.

Adult Safeguarding Concern Form

This form should only be filled in with information already known for concerns within the charity (or about a concern at Moorfields or UCL Institute of Ophthalmology where it was not appropriate to raise the concern with their Lead for safeguarding). Be careful not to ask leading questions. **Fill in factually, with only the details known already**. It should be filled out ASAP, on the same day and stored on MEC'S SECURE SYTEM by the Lead for safeguarding

Details of Concerned Person	
Service or department	
Name	
Job Title/Role:	
Contact email	
Contact number(s)	
Details	
Address where concern was raised	
Name of the adult at risk (if known)	
Date of birth (if known)	
Address (if known)	
Name of parent or carer and contact details	
Any special needs known	Including medical/disability/language/etc.
Name and details of any other adults at risk or children (under 18 years of age) in the family or setting	If relevant to the concern

Has the adult's consent been sought? (If not, why not?)	
Details of the Concern	
Date and time of concern	
Details and nature of concern	Including any witnesses
Details of Actions Taken/to be Taken (to be completed by the Operational Deputy)	
Actions taken so far	Detail any agency contacted, who was spoken to and any timescales/actions given. If no action has been taken, detail the reason(s) why. Include times and dates.
Actions to be taken	Detail any actions that are to be taken, along with date/time, timescales and the full names and job roles of those who will be taking the action(s).

Name of agency contact(s), addresses and phone numbers/e-mails:	If you have dealt with any agency (i.e. Police/Social services/etc.), record the name, agency, job role and contact details of the person(s) you have dealt with.
-----------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------

Signed

To be completed by the concerned person

Signature:

Print Name:

Job Title/Role:

Date:

Time:

To be completed by the Lead for safeguarding:

Action taken

Decision made

Signature:

Print Name:

Job Title/Role:

Date:

Time:

Child Safeguarding Concern Form

This form should only be filled in with information already known for concerns within the charity (or about a concern at Moorfields or UCL Institute of Ophthalmology where it was not appropriate to raise the concern with their Lead for safeguarding) . Be careful not to ask leading questions. **Fill in factually, with only the details known already**. It should be filled out ASAP, on the same day and stored on MEC'S SECURE SYTEM by the Lead for safeguarding

Details of Concerned Person	
Service or department	
Name	
Job Title/Role:	
Contact email	
Contact number(s)	
Details of the Child	
Address where concern was raised	
Name (if known) (including any names known)	
Date of Birth (if known)	
Address (if known)	
Name of parent or carer and contact details (if known)	
Any special needs known	Including medical/disability/language/etc.

Name(s) and details of any other children (under 18 years of age) or adults at risk in the family or setting	
Name(s) and details of any other significant adults in family	
Details of the Concern	
Date and time of concern	
Details and nature of concern	Including any witnesses
Details of Actions Taken/to be Taken (to be completed by Operational Deputy)	
Actions taken so far	Detail any agency contacted, who was spoken to and any timescales/actions given. If no action has been taken, detail the reason(s) why. Include times and dates.
Actions to be taken	Detail any actions that are to be taken, along with date/time, timescales and the full names and job roles of those who will be taking the action(s).

Name of agency contact(s), addresses and phone numbers/e-mails:	If you have dealt with any agency (i.e. Police/Social services/etc.), record the name, agency, job role and contact details of the person(s) you have dealt with.
-----------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------

Signed

To be completed by the concerned person

Signature:

Print Name:

Job Title/Role:

Date:

Time:

To be completed by the Lead for safeguarding:

Action taken

Decision made

Signature:

Print Name:

Job Title/Role:

Date:

Time: