



Safeguarding policy

Designated Safeguarding Officer (DSO): Steph Ashton

The DSO is responsible for managing safeguarding reports, liaising with statutory authorities and ensuring internal policy compliance.

This policy is guided by and compliant with the relevant UK legislation and statutory guidance, including but not limited to:

- ☐ The Children Act 1989 & 2004
- ☐ The Care Act 2014
- ☐ Working Together to Safeguard Children (2018, updated 2023)
- ☐ Keeping Children Safe in Education (where relevant)
- ☐ Charity Commission safeguarding guidance
- ☐ The Human Rights Act 1998
- ☐ GDPR and the Data Protection Act 2018

The purpose of this policy is to protect individuals, particularly children, vulnerable adults, and those receiving assistance, from harm that may arise from their interaction with The Sophie Lancaster Foundation. This includes harm resulting from:

- The conduct of staff or any authorised person representing The Sophie Lancaster Foundation
- The design and delivery of The Sophie Lancaster Foundation's programmes and activities

This policy outlines the commitments made by The Foundation and informs staff and any authorised representatives of their individual and collective responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is addressed under The Foundation's Anti-Bullying and Harassment Policy
- Safeguarding concerns in the wider community that are not perpetrated by The Foundation or its personnel

What is Safeguarding?

Safeguarding means protecting people's health, well-being and human rights, enabling them to live free from harm, abuse and neglect. In our context, safeguarding means protecting people, including children and vulnerable adults, from harm that could arise from their interaction with our staff, authorised representatives or programmes.

Further definitions relating to safeguarding are provided in the glossary below.

Scope

This policy applies to:

- All staff employed by The Sophie Lancaster Foundation
- Any authorised individual representing The Sophie Lancaster Foundation while engaged in work or visits related to the Foundation, including but not limited to Ambassadors and Trustees

Policy statement

The Foundation believes that every person we interact with, regardless of age, gender identity, disability, sexual orientation, religion, or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect and exploitation. We will not tolerate abuse or exploitation by staff or any authorised representative of the Foundation.

This policy addresses safeguarding in the following areas: child safeguarding, adult safeguarding and protection from sexual exploitation and abuse. We're committed to addressing safeguarding in all its activities through three key principles: prevention, reporting and response.

Prevention

The Foundation's responsibilities:

- Ensure all staff, Trustees and Ambassadors have access to, are familiar with and understand their responsibilities within this policy
- Design and deliver all its programmes and activities in a way that protects individuals from any risk of harm that may arise from their interaction with the Foundation. This includes how information about individuals in our programmes is gathered and shared
- Implement strict safeguarding procedures when recruiting, managing and deploying staff or any authorised representative, including obtaining satisfactory references and DBS clearance where appropriate
- Ensure staff, Trustees and Ambassadors receive annual safeguarding training at a level appropriate to their role within the organisation

- Respond promptly to reports of safeguarding concerns, in accordance with due process
- Record, store, and handle information securely and confidentially, in line with GDPR legislation and guidance

Due diligence in our recruitment

As part of our commitment to safeguarding and ensuring that the individuals associated with The Sophie Lancaster Foundation do not pose any risk to the safety or well-being of others, the Foundation will carry out due diligence checks on all new hires, Trustees, Ambassadors and Volunteers. These checks will include online searches, including reviewing social media profiles, to ensure that there are no risks to the safeguarding of staff, Volunteers, Trustees and those interacting with the Foundation. While such online searches are not mandatory, everyone should expect these checks as part of the recruitment and onboarding process.

Online searches are becoming a standard part of due diligence checks, and they help us ensure that no individual poses a threat to the safeguarding of individuals, the reputation of the Foundation, or its staff and Volunteers.

Staff responsibilities:

Child safeguarding

Our staff and any authorised representative must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to any form of physical, emotional, or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children, including child labour or trafficking

Our staff and any authorised representative will:

- Value, listen to and respect children and young people
- Use safeguarding and child protection procedures to share concerns and relevant information with the appropriate agencies and inform parents, families or carers where appropriate
- Signpost children, young people and families to agencies that offer support if needed
- Direct children, young people and families to the designated safeguarding officer if they have concerns
- Staff will remain vigilant to signs of poor mental health, self-harm or suicidal ideation and escalate any concerns immediately to the DSL or appropriate services.

Adult safeguarding

Our staff and any authorised representative must not:

- Sexually abuse or exploit vulnerable adults
- Subject a vulnerable adult to any form of physical, emotional, or psychological abuse or neglect

Our staff and any authorised representative will:

- Empower vulnerable adults by supporting and encouraging them to make their own decisions and give consent regarding their own safeguarding
- Take accountability for safeguarding within their remit
- Work with relevant agencies to determine actions that are in the best interest of vulnerable adults
- Prevent abuse and neglect by ensuring it cannot occur
- Staff will remain vigilant to signs of poor mental health, self-harm or suicidal ideation and escalate any concerns immediately to the DSL or appropriate services.

Digital/Online Safeguarding

The Foundation recognises that digital spaces may present risks of grooming, bullying and inappropriate contact. All staff must follow SLF Digital Safety Policy during virtual engagement.

Protection from sexual exploitation and abuse

Our staff and any authorised representative must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance due to beneficiaries of assistance
- Engage in sexual relationships with beneficiaries of assistance due to inherently unequal power dynamics

Furthermore our staff and any authorised representative must:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by a staff member or authorised representative to the CEO or a Trustee

Enabling reports

We'll ensure that accessible, appropriate and safe means for reporting safeguarding concerns and disclosures are available to staff, any authorised representatives and the communities we serve. Any staff, Trustees or Ambassadors reporting concerns or complaints via formal whistleblowing channels will be protected by The Sophie Lancaster Foundation's Whistleblowing Policy. The Foundation will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Staff members who have a complaint or concern regarding safeguarding should report it immediately to their designated Safeguarding Officer. If a staff member does not feel comfortable reporting to their designated officer (e.g. if they feel the report will not be taken seriously, or if that person is implicated), they may report to any other suitable staff member, such as the CEO or Trustee.

Response

We'll follow up safeguarding reports and concerns according to policy, procedure and legal and statutory obligations. Any safeguarding concern will be acknowledged within 24 hours and assessed within five working days. Urgent or serious cases will be acted upon immediately and will apply appropriate disciplinary measures if a staff member is found in breach of this policy. If a Trustee or Ambassador is found in breach of the safeguarding policy, their position may be terminated. The Foundation will offer support to survivors of harm caused by staff or any authorised representative, regardless of whether a formal internal response (such as an internal investigation) is carried out.

Referral to statutory Authorities

If a safeguarding concern reaches the threshold for significant harm or criminal activity, The Sophie Lancaster Foundation will report this to the appropriate authority such as Children's Social Care, Adult Social Services or the Police without delay.

Confidentiality

Confidentiality must be maintained at all stages of the safeguarding process.

Information related to the concern and case management should be shared only on a need-to-know basis and must always be kept secure.

Record Keeping and Incident logs

All safeguarding concerns and actions taken will be logged in a secure, safeguarding incident register. This register will be reviewed regularly by the DSO, CEO and Trustees for patterns or repeat concerns.

Signed:



Date: 22 January 2026

Chief Executive Officer

Signed:



Date: 22 January 2026

Chair of the Board of Trustees

Glossary of Terms

- **Beneficiaries of Assistance:** Individuals who directly receive goods or services from The Sophie Lancaster Foundation
- **Adult Exploitation:** Exploitation occurs when an individual is coerced or manipulated into doing something they don't wish to do for someone else's gain
- **Adult Physical Abuse:** Includes physical actions such as hitting, slapping, pushing, and misuse of medication
- **Child:** A person below the age of 18
- **Child Exploitation:** Involves grooming or manipulating children into performing criminal or sexual activities
- **Child Labour:** Work that deprives children of their childhood and harms their physical and mental development
- **Child Physical Abuse:** Involves deliberate harm to a child's body
- **Child Sexual Abuse:** Occurs when a child is forced or persuaded into sexual activities
- **Commercial Exploitation:** Involves the sexual exploitation of children for financial gain
- **Designated Safeguarding Officer:** The person responsible for safeguarding within an organisation
- **Disclosure:** The process by which a child or young person shares their experience of abuse
- **Emotional Abuse:** Non-physical abuse meant to control, isolate, or frighten a person
- **Harm:** Any behaviour that causes physical or psychological damage.
- **Neglect:** Failing to provide proper care, leading to harm

- **PSEA (Protection from Sexual Exploitation and Abuse):** Refers to actions to protect individuals from sexual exploitation and abuse
- **Psychological Abuse:** A form of abuse where words and actions are used to manipulate and harm a person mentally and emotionally
- **Safeguarding:** Protecting individuals' health, well-being, and human rights from harm, abuse, and neglect
- **Sexual Abuse:** Actual or threatened sexual intrusion
- **Sexual Exploitation:** Abuse of power for sexual gain