



saving the lives
of people with
blood cancer

ANTHONY NOLAN

SAFEGUARDING POLICY & PROCEDURES

Author: Governance Officer.

Owner: Designated Safeguarding Lead Director.

Approval: Reviewed – Strategic Leadership Team, 30 June 2022
Reviewed – Governance & Risk Committee, 12 July 2022
Approved – Board of Trustees, 27 July 2022

Date: 27 July 2022

Version: 7

Date of next Review: three yearly unless new legislation or best practice require earlier
revision

CONTENTS

1. Statement of Policy	2
2. Purpose	2
3. Our Approach to Safeguarding	3
4. Definitions	4
5. Recording and Reporting Concerns	5
6. Investigating Allegations of Abuse	7
7. Support for Employees and Volunteers	9
8. Safeguarding Code of Conduct	10
9. Confidentiality	10
10. Complaints about Safeguarding Actions	10
11. Related Policies and Associated Guidance	11
12. Appendix A - Safeguarding Reporting Form	12
13. Appendix B – Safeguarding Code of Conduct	13
14. Document Review and Approvals	16

1 STATEMENT OF POLICY

Protecting and safeguarding all those who come into contact with us through our work (including children and adults at risk) from abuse and mistreatment of any kind is a priority for Anthony Nolan and its Trustees.

This includes:

- people who benefit from our work, including patients
- employees
- volunteers (including Trustees) and
- other people who come into contact with us through our work, this could include financial donors for example.

Anthony Nolan's Trustees wish to promote a fair, open and positive culture and ensure all involved feel able to report concerns, confident that they will be heard and responded to.

Please refer to section 4.1 of this Policy for more detailed definitions.

The activities carried out by Anthony Nolan mean that there are a range of employees and volunteers who may come into contact with people who are at risk of harm from abuse or mistreatment of any type. All employees and volunteers are required to help promote the welfare of children and adults at risk and report any safeguarding concerns to the relevant person.

This policy, and associated procedures, upholds Anthony Nolan's duties and reinforces our values and responsibilities in ensuring we provide a safe and responsive environment which safeguards children and adults at risk. See the Code of Conduct for employees and volunteers in Appendix B. It demonstrates compliance with UK legislation and other four nations' government legislation, policy guidance, research and good practice. This policy applies to all employees and volunteers, including the Board of Trustees, agency employees, students, or anyone working on behalf of Anthony Nolan.

2 PURPOSE

Anthony Nolan has a responsibility to safeguard the welfare of all children, adults at risk and those who are involved in, or affected by, our work. This policy sets out our approach to reducing and managing risks, and the action employees and volunteers are asked to take when dealing with safeguarding concerns.

The purpose of this policy is to ensure:

- (a) The safety needs and interests of children and adults at risk who receive Anthony Nolan services are upheld.

- (b) Appropriate response is made to protect all children and adults at risk who may be experiencing abuse or mistreatment of any type.
- (c) Employees and volunteers are provided with the overarching principles that guide our approach to safeguarding.

This policy provides clear procedures on what to do if you have a safeguarding concern, how to manage, respond and refer those concerns, and where to go for help and support. This applies to all employees and volunteers across all parts of the charity.

3 OUR APPROACH TO SAFEGUARDING

3.1 Safeguarding Group, Roles & Responsibilities

Under the oversight of the Board of Trustees who have oversight of how safeguarding and protecting people from harm are managed within Anthony Nolan, there are the following:

A Safeguarding Group, led by the Designated Safeguarding Lead Director, has been formed to provide advice and support in relation to this policy, operating within its agreed terms of reference.

Designated Safeguarding Leads provide advice and support to employees and volunteers, provide advice to the organisation about all elements of safeguarding, oversee investigations into allegations and concerns of abuse, and ensure compliance with policies and procedures. The Designated Safeguarding Leads liaise with and seek advice from the Designated Safeguarding Lead Director and external agencies, as required.

The Designated Safeguarding Lead Director supports Anthony Nolan's safeguarding responsibilities, provides support and guidance to Designated Safeguarding Leads in dealing with any difficult or urgent concerns, and ensures policies and procedures are complied with, reviewed, and updated in liaison with the Board of Trustees.

The Human Resource Team (HR) is responsible for consultation and advice in relation to the implication of safeguarding issues in safer employment, disciplinary, or grievance procedures.

3.2 Recruitment of Employees and Volunteers (including Trustees)

Anthony Nolan has rigorous and robust recruitment procedures in place to ensure that we appoint employees and volunteers who are appropriately qualified, and have the skills and knowledge to deliver a quality service. The law in the UK makes it clear that, under certain circumstances, criminal background checks can be used as part of recruiting paid employees and volunteers:

- We have a legal duty to carry out full criminal background checks for roles that involve very specific tasks that are considered "regulated activity" or "regulated work".

- We are entitled to carry out full criminal background checks for roles that involve substantial, unsupervised contact with children or adults at risk, but do not involve carrying out tasks that constitute what is known as regulated activity or regulated work.
- We are not eligible to ask for full criminal background checks for any other roles.

In England and Wales, criminal background checks are carried out by the Disclosure and Barring Service (DBS), in Northern Ireland by AccessNI, and in Scotland by Disclosure Scotland.

Requesting a full criminal background check for a role that is not eligible is unlawful. Anthony Nolan will only carry out the appropriate level of criminal background checks on successful applicants, for employee and volunteer roles, where it can be clearly demonstrated that such a check is justified under the relevant national law.

3.3 Learning & Development

All employees and volunteers will be made aware of their role in supporting Anthony Nolan's safeguarding responsibilities. There are different levels of training provided which are relevant to different roles and responsibilities within Anthony Nolan. All employees should complete the mandatory safeguarding training within their first month of employment and are required to complete the mandatory training in order to pass their probationary period.

4 DEFINITIONS

4.1 Types of Abuse

The Care Act, 2014 and Working Together to Safeguard Children (a guide to inter agency working to safeguard and promote the welfare of children) 2018, as well as other sources, outline categories of abuse, which include but is not restricted to:

- Discriminatory
- Domestic violence
- Financial or material
- Organisational
- Modern slavery
- Neglect/acts of omission /self-neglect
- Physical
- Psychological/emotional
- Sexual
- Cyber abuse

Child: Any person under the age of 18 years (16 years in Scotland)

Adult at risk: An adult who

- has needs for care and support (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. (Care Act 2014, England).

Safeguarding: In its simplest terms safeguarding can be defined as 'keeping children and adults at risk safe from harm'. It is a broad term that can refer to things such as road safety and playground safety, as well as specific abuse.

Child protection: Is part of safeguarding and refers to the activity undertaken to protect young people. It focuses on specific types of abuse and our response to its occurrence

Safeguarding Children

Safeguarding children duties apply to any charity such as Anthony Nolan working with, or coming into contact with, anyone under the age of 18. The Charity Commission recommend charities use resources and follow standards from the NSPCC for safeguarding children.

Safeguarding children means to:

- protect children from abuse and maltreatment
- prevent harm to children's health or development
- ensure children grow up with the provision of safe and effective care
- take action to enable all children and young people to have the best outcomes
- in England follow Working Together to Safeguard Children 2018

5 RECORDING AND REPORTING CONCERNS

Employees and volunteers are asked to report concerns about the welfare of people they come into contact with. These may be about people affected by blood cancer, or may relate to the behaviour of other employees or volunteers, or working practices in place.

Individual employees and volunteers must never investigate an allegation of abuse unless appointed to do so by a Designated Safeguarding Lead.

Please refer to the guidance below regarding our approach and the steps you should take. If you are not sure what to do, or need further advice and/or support, please contact a member of the Safeguarding Group on safeguarding@anthonymolan.org.

In all circumstances, employees and volunteers should take the following action:

- (a) Ensure their own safety – leave the situation if they are at risk of harm;
- (b) Where there is clear evidence of harm, or an imminent danger call the emergency services immediately;
- (c) Treat all allegations of abuse seriously;
- (d) Report concerns to a line manager/Volunteer Lead/Designated Safeguarding Lead as soon as possible.

5.2 Responding to a Child/Adult at Risk Concern

If a safeguarding concern comes to your attention, the following actions must be taken by the person receiving the information:

1. If in person, always offer reassurance, listen to and take seriously what is being said. Never promise to keep secrets or be persuaded by the individual or the family not to take action if you are worried that the individual is being harmed or is at risk of harm.
2. If the child/adult is at immediate risk of harm, (unless doing so would put you or others at risk):

Refer immediately to the police by calling 999, or NSPCC helpline on 0800 800 5000. See section 5.3 below for out of hours services.
3. Explain the process (where possible) to the child/adult: that you will need to pass this information on, to whom you'll pass it on to, the reasons why, and any possible actions.
4. Contact your Line Manager/Volunteer Lead, to inform them that you are making a safeguarding report.
5. Complete the safeguarding record form (see Appendix A. Templates available for employees on Matchbook) as soon as possible after receiving information, including date, time, words spoken, injuries noticed/disclosed, and a brief outline of the concern or incident. It may be necessary to undertake some enquiries, including; full name, age, mobile number, email address, and any involvement with Anthony Nolan's work.

It is not your job to investigate or verify what is being said, or to examine the child/adult; this is the statutory responsibility of the local authority/child protection services and/or the police.

6. Report the concern to a Designated Safeguarding Lead, forwarding to them the completed Safeguarding Record Form. The Designated Safeguarding Lead will review all details of the case and make a clear assessment of whether the

information received is deemed to be a child/adult protection referral, and/or a situation in which further action must be taken. He/she may also contact the Designated Safeguarding Lead Director and external agencies for further information and advice.

7. The Safeguarding Lead will be responsible for agreeing any necessary further action with the Designated Safeguarding Lead Director. If a referral is needed to a child/adult protection agency, this will be completed by a member of the Safeguarding Group within 24 hours.
8. The Designated Safeguarding Lead will also complete necessary sections on the respective Safeguarding Record Form to provide details of further people contacted, together with any outcome known at that stage. Reports should be copied to the Designated Safeguarding Lead Director.
9. If, at any point, the situation escalates and it seems that the person is at increased risk, the Designated Safeguarding Lead must immediately contact the police.
10. The Designated Safeguarding Lead must establish the outcome of the referral. The Local Authority Social Work Manager will decide if child/adult protection procedures are appropriate. If adult/child protection services do not make further contact with Anthony Nolan within three days, the Designated Safeguarding Lead will contact them for an update.
11. The Designated Safeguarding Lead will inform the individual who raised the concern of the outcome in as much detail as possible, respecting confidentiality. In many cases this is likely to be an acknowledgement of receipt of the concern, and confirmation that action has been taken.
12. The person reporting the concern can request an update on the outcome from the Designated Safeguarding Lead. If they are not satisfied by the actions taken, they can raise this with the Designated Safeguarding Lead Director, who will look into the matter further.

5.3 Out of Hours Services

If the child/adult is at immediate risk of harm, or if you need advice outside of office hours:

- 1) Refer immediately to the police by calling 999.
- 2) Contact your line manager/Volunteer Lead, as soon as possible, to inform them that you are making a safeguarding report.
- 3) If the incident is categorised as a "Serious Incident", as defined in Anthony Nolan's Serious Incidents Reporting Policy and Procedure, the incident must be reported in accordance with the process laid out in that policy.

6 INVESTIGATING ALLEGATIONS OF ABUSE

Where a Designated Safeguarding Lead decides that the allegations need to be investigated, the issue will be notified to the appropriate local authority, health and social care trust and/or the police. All enquiries will be managed within the local authority relevant Safeguarding Boards, trust or police procedures, in line with legal and statutory guidance. The main aim of any enquiries is to prevent or stop harm to children or adults at risk.

Anthony Nolan employees and volunteers may be asked to cooperate as required with any external protection agencies, enquiries or investigations.

6.1 Allegations of Abuse Made Against Anthony Nolan Employees and Volunteers

Anthony Nolan must undertake inquiries where an Anthony Nolan employee or volunteer is alleged to have abused someone. The respective line manager and Designated Safeguarding Lead will discuss the allegation with HR and, after consulting the Designated Safeguarding Lead Director, will make a decision about whether the allegation needs to be reported to the police and/or Local Authority Safeguarding services.

A decision must be made as to whether the employee or volunteer is able to continue in their normal duties, or whether adjustments should be made to their work to protect them and/or others. This is in order to allow an investigation to be carried out as quickly as possible, while minimising risk. The Designated Safeguarding Lead Director will:

- take advice from the police and/or local authority about any internal investigation required
- will advise the individual on the investigative process
- and appoint an appropriate person to carry out any investigation.

Any adjustment and/or investigation will be carried out under the employee disciplinary policy & procedure or the volunteer management process.

All employees and volunteers who are alleged to have abused someone will be signposted to agencies that can provide support until any investigation is concluded.

6.2 E-safety & Social Media

All employees and volunteers are asked to exercise personal responsibility and maximise safety, in line with Anthony Nolan's Information and Communications Policy and Procedures, Social Network Policy, and Volunteer Social Media Policy & Procedures, when accessing Anthony Nolan IT and Social Media.

- The use of e-media should always be within the context of a planned and supervised piece of work, consistent with Anthony Nolan's Safeguarding Code of Conduct (See Appendix B. Copies also available on Matchbook for employees).

- Employees and volunteers are required to gain permission from their relevant line manager on taking and storing digital images, and gain appropriate consents for all images of children used.
- All forms of social media and internet postings must be moderated appropriately.

7 SUPPORT FOR EMPLOYEES AND VOLUNTEERS

Certain roles within Anthony Nolan may increase the risk of physical, psychological, and emotional harm, such as roles where employees or volunteers deal with sensitive and challenging situations and issues. Anthony Nolan has a duty to ensure that all employees and volunteers in such roles have access to regular supervision and the opportunity to discuss their own wellbeing. Our Health and Safety Policy, Serious Incident Reporting Policy and Volunteer Personal Safety Policy & Procedures ensure we have arrangements in place to prevent, where possible, violence and aggression, harassment or discrimination occurring whilst working or volunteering, and to take action where necessary to deal with any incidents.

All roles must be assessed carefully by the appropriate person (line manager/Volunteer Lead/HR), in conjunction with the Safeguarding Group, to ensure that signposting for support and provision of training are put in place, as necessary.

The requirement for the following additional options must be considered:

- Personal safety training
- Clinical supervision

All employees, and eligible volunteers, have access to an Employment Assistance Programme (EAP), provided by the external agency Health Assured. This is a 24 hour specialist service designed to offer confidential information and support across a number of topics.

7.1 Lone Working

Anthony Nolan has a Lone Working Policy, which provides guidance and information about issues relating to lone working. Individuals working alone may be more vulnerable to allegations of abuse and therefore must adhere to safer working practice within the Lone Working Policy. It is recognised that the increase in hybrid working patterns amongst the workforce may also present some challenges. Employees will be provided with regular support from their line manager and also have access to the Wellbeing resources provided by Anthony Nolan.

Employees and volunteers who work alone will receive any necessary training and information about how they can access support whilst working.

7.2 Advice and Support

Further advice and support can be obtained by contacting HR or a member of the Safeguarding Group on safeguarding@anthonymolan.org.

8 SAFEGUARDING CODE OF CONDUCT

All employees and volunteers are asked to follow the guidelines set out within the Safeguarding Code of Conduct (see Appendix B), to help protect the integrity of themselves and the organisation. This information forms part of the mandatory safeguarding e-learning induction module.

9 CONFIDENTIALITY

All documentation relating to incidents or allegations of people being harmed, or placed at risk of harm, will be kept and treated confidentially and in accordance with the Data Protection Act 2018 (DPA) and General Data Protection Regulations. This includes information from Safeguarding Report Forms, individual details, and outcomes of all investigations. Only those people who need to know about an incident will be kept informed. All personal data will be managed in accordance with our Data Protection Policy.

The minimum relevant information will be stored within a restricted access folder on the server and managed by the Safeguarding Group.

10 COMPLAINTS ABOUT SAFEGUARDING ACTIONS

If, for any reason, an employee or volunteer feels they cannot raise issues through a member of the Safeguarding Group or line management, then members of the Board of Trustees will be available. No individual should feel that they cannot report a concern. All reports will be treated seriously, fairly and impartially. The Trustees available in such cases are:

- Chair of the Board of Trustees: Nicola Horlick
- Chair of the Governance and Risk Committee: Martin Laws

Contact information for the Chair of the Board of Trustees or the Chair of the Governance and Risk Committee can be obtained from the Anthony Nolan Governance Officer, or the Director of Legal and Governance.

Any complaint about the way Anthony Nolan has handled a safeguarding issue will be logged and addressed by the relevant team. If the complaint concerns sensitive or confidential information, or information which is the subject of an ongoing investigation, it may be referred to the Designated Safeguarding Lead Director who will discuss with the relevant people and respond to the complaint as appropriate having established the facts.

11 RELATED POLICIES AND ASSOCIATED GUIDANCE

- Anthony Nolan's Safeguarding Code of Conduct for Employees and Volunteers
- The Care Act 2014
- Children's Acts 1989 & 2004
- Disciplinary Policy & Procedure for Employees

- Volunteer Concern Resolution Policy
- Volunteer Personal Safety Policy & Procedure
- AdHoc Counselling Referral Form
- Anthony Nolan's Lone Working Policy
- Corporate Entertainment, Gifts, Hospitality and Promotional Expenditure Policy
- Complaints Policies
- Responsible Gambling Policy
- Fundraising and Vulnerable People Policy
- Fundraising Regulator
- Whistleblowing policy
- Serious Incident Reporting policy
- Social Networking Policy
- Working Together to Safeguard Children, a guide to inter- agency working to safeguard and promote the welfare of children, 2018
- Charity Commission Safeguarding and protecting people for charities and trustees (October 2019)



saving the lives
of people with
blood cancer

Safeguarding Record Form

Out of hours: If the child/adult is at immediate risk of harm, or if you need advice outside of office hours: call 999 or contact NSPCC on 0800 800 5000 and then Inform a Designated Safeguarding Lead of your actions and complete this form.

Please complete all sections of this form with as much information as possible. If you do not have the information, do not let it delay reporting the concern. Once reported, the Safeguarding Lead will speak with you if there are any questions or clarifications needed. If you need support in completing this form you can contact a member of the Safeguarding Group by emailing safeguarding@anthonymolan.org

Once this form is complete, please scan and send to:

safeguarding@anthonymolan.org.uk

Information provided will be managed sensitively and stored in line with our internal safeguarding procedures

Details of the Child/Adult at Risk and their Parents(s)/ Carer (if known)			
Name of Child / Adult at Risk			
Gender		Date of Birth	
Parent/Carers Name(s)	*leave blank if your concern is about an adult at risk who does not have a carer		
Home address			
Telephone number			

Your details			
Your name		Your role	
Contact phone number:		Date form completed	

Details/physical description of the person alleged to have caused harm to a child/ adult at risk, or who there is reason to believe may cause harm (If known)	
Name or description of Child / Adult at Risk	

Gender		Date of Birth	
Agency			
Parent/Carers Name(s)	*leave blank if your concern is about an adult at risk who does not have a carer		
Home address			

Report			
These are my own concerns	Yes <input type="checkbox"/>	These are concerns raised by someone else	Yes <input type="checkbox"/>
		(Please provide details)	
Nature of your concern (Please describe what you have been told and/or observed that has worried you)			
Description:			
Please tick here if you have attached a supporting document (e.g. letter): <input type="checkbox"/>			

Further Actions Taken			
Details of any witnesses to the incident(s)			
Police / Other Emergency Services	Yes <input type="checkbox"/>	Other Anthony Nolan employee / Volunteer	Yes <input type="checkbox"/>

Further details: Including what advice did they give you and what actions did you take

Further details: Including what advice did they give you and what actions did you take			
Print Name		Signature	

To be completed by the Safeguarding Lead

Assessment and actions:

To be completed by the Safeguarding Lead		
Assessment and actions:		
Safeguarding Lead name and signature:	Print Name:	Signature:
Date:		

APPENDIX B

saving the lives
of people with
blood cancer

**Safeguarding Code of Conduct
For Employees and Volunteers**

Anthony Nolan believes that all staff and volunteers should work together to safeguard and promote the welfare of children and adults at risk. This code of conduct forms part of the agreement for all paid and unpaid roles.

This code of conduct is designed to:

- safeguard children and adults at risk involved in any activity
- assist employees and volunteers to identify appropriate behaviour as they carry out their role
- enable employees and volunteers to raise concerns without fear of recrimination

Anthony Nolan promises to:

- support any employee or volunteer who raises a concern
- take all reports seriously and follow up according to internal procedures
- provide appropriate training and guidance to all employees and volunteers
- investigate any breach of this code of conduct and take appropriate action

We ask all employees and volunteers to:

- report any incidents or concerns that cause you to believe that a child or adult is, or is likely to be, at risk of harm to a Safeguarding Lead. In the case of emergencies, report directly to the police
- remember not to investigate the matter any further yourself, and don't promise to keep any disclosure of abuse a secret
- be respectful towards your peers, other volunteers and Anthony Nolan staff. Treating them how you would want to be treated yourself
- be aware of changes in behaviour and inappropriate conduct in other workers and volunteers and report if necessary
- disclose any criminal record, caution, reprimand or warning - whether received prior to, or during the course of your role with Anthony Nolan

We ask all employees and volunteers not to:

- use your position to intimidate, bully, threaten, discriminate against, coerce or undermine children, adults, volunteers or employees.
- behave or communicate with children or adults in ways which seek to build inappropriate relationships which may put them at risk
- use a relationship with a patient, donor, or their family, for personal gain

- give special rewards or privileges in an attempt to build inappropriate relationships with children or adults
- engage in, or attempt to engage in, abusive or inappropriate relationships with children or adults, including the use of suggestive conversations, comments, texting or emails
- make, look at, or possess indecent images of children or illegal images of adults
- carry out your role whilst adversely affected by alcohol, solvents or drugs
- encourage or assist others to break the law in any way

12 DOCUMENT REVIEW AND APPROVALS

Reviewed/Approved by	Date	Version	Comments
Board of Trustees	29/06/2017	3	This Policy was previously known as the Safeguarding Children and Adults at Risk Policy and Procedures). This version and the accompanying Safeguarding Strategy document were agreed by the Board of Trustees on 29th June 2017
Designated Safeguarding Lead Director	26/03/2018	4	Minor revisions approved
Designated Safeguarding Lead Director	15/07/2019	5	Updated for change of Designated Safeguarding Lead Director
Board of Trustees	16/07/2020	6	Approved
Designated Safeguarding Lead Director	July 2021	6	Updated for change in Anthony Nolan Chair
SLT review	30/06/2022	7	Recommended to the GRC for review and Board approval
GRC review	12/07/2022	7	Recommended to the Board for approval
Board of Trustees	27/07/2022	7	Approved