Safeguarding Policy and Procedure

October 2026

PURPOSE AND SCOPE

GivingTime is committed to safeguarding and protecting the welfare of everyone who uses its services. The purpose of this Safeguarding Policy and Procedure (the "**Policy**") is to:

- Protect young people who receive GivingTime's services from abuse;
- Provide a clear framework for action whenever abuse is disclosed or suspected; and
- Provide trustees, volunteers and anyone working on behalf of GivingTime with the overarching principles that guide our approach to safeguarding and child protection.

This Policy applies to all GivingTime trustees, volunteers or anyone working on behalf of GivingTime. For the purposes of this Policy, "young person" shall mean any individual under the age 18.

This Policy is relevant to all forms of abuse. Abuse is a violation of an individual's human and civil rights by any other person or persons and can take a variety of forms. For more details and guidance on recognising abuse see Appendix 1.

LEGAL FRAMEWORK

This Policy has been drawn up on the basis of law and guidance that seeks to protect young people, namely:

- Children Act 1989 and 2004;
- United Nations Convention on the Rights of the Child 1991;
- Data Protection Act 2018;
- UK GDPR (EU GDPR as incorporated in English law pursuant to the European Union (Withdrawal) Act 2018);
- Human Rights Act 1998;
- Sexual Offences Act 2003;
- Children Act 2004;
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Children and Families Act 2014;
- Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014;
- Information sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2018;
- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2018 and 2023; and
- Keeping children safe in education; HM Government 2026.

This Policy should be read alongside our Speak Up Policy, Equality and Diversity Policy and the policies and procedures set out in the Coach Handbook. Where other procedures apply to a disclosure of abuse or harm (e.g. grievance, complaints, disciplinary), the welfare and safety of the young person remains paramount.

SAFEGUARDING POLICY

Although the ultimate safeguarding responsibility for the young person remains with the relevant school, GivingTime recognises that:

- Safeguarding and keeping children safe is everyone's responsibility
- the welfare of the young person using its services is paramount;
- all young people, whatever their age, disability, gender, racial origin, language, religious beliefs and/or sexual identity have the right to protection from abuse or harm; and
- working in partnership with young people and their parents/guardians/carers/schools is essential for the protection of everyone.

SAFEGUARDING PROCEDURE

- We will seek to keep everyone who uses our services safe by the below methods: implementing a protective recruitment and training procedure;
- appointing a GivingTime Safeguarding Officer (the **"GT Safeguarding Officer"**);
- implementing a protective procedure for coaching and other activities; and
- effectively identifying and responding to safeguarding risks and concerns.

Recruitment and Training

GivingTime will ensure that all volunteers whose roles include working with young people are carefully selected, screened, trained and supervised. In particular:

- All successful volunteer applicants to GivingTime will take part in the induction process;
- As part of the induction process, all volunteers will be made aware of and given a copy of this Policy and a safeguarding training presentation and asked to complete a short quiz in which a score of 100% is required;
- All volunteers & trustees will be required to refresh their safeguarding knowledge each January, re-reading this policy, the safeguarding training and scoring 100% in a refresher quiz
- Volunteers whose role with GivingTime means they will work with young people (including all Coaches and GT School Liaisons) will be required to provide appropriate, up-to-date enhanced DBS checks, which must be renewed every three years or included in the DBS subscription service. GivingTime will also perform annual checks to ensure no updates to the DBS checks;
- Any new roles which are developed will be risk assessed to check whether they require a DBS check;
- All individuals working with young people as part of their role with GivingTime, including Coaches, will be given the appropriate guidance and training to ensure they are able to recognise and act on any suspicion or disclosure of abuse or harm; and
- GivingTime will ensure that all volunteers involved in recruitment, training and supervision, are aware of this Policy and have received appropriate training and support to ensure its full

implementation. In addition, GivingTime volunteers will need to confirm annually that they have read and understood this Policy.

GT Safeguarding Officer

The GT Safeguarding Officer has overall responsibility for the implementation of this Policy, and is responsible for, among other things, making referrals to the relevant authorities.

Volunteers have a duty to report any concerns about actual or suspected abuse to the GT Safeguarding Officer, as detailed below. If the volunteer does not feel comfortable reporting to the GT Safeguarding Officer (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate GivingTime volunteer or GivingTime trustee.

If you have any concerns relating to a safeguarding issue, the GT Safeguarding Officer can be contacted using the below details:

Name: Annalisa Alexander

Email: safeguarding@givingtime.org.uk

Procedures for coaching and other activities

GivingTime will implement the following procedures for online coaching:

- GivingTime provides coaching sessions online which are arranged through the GivingTime portal at a time and date that is convenient for both the Coach and young person. For safeguarding purposes, online coaching sessions between the young person and the Coach must be conducted in accordance with the relevant GivingTime policies and procedures including without limitation the policies set out in the Coaches Handbook and the online coaching risk assessment.
- If, for any reason, the online coaching session cannot be conducted in accordance with GivingTime's policies and procedures, the Coach should reschedule the coaching session.

For all activities, GivingTime volunteers will not:

- engage in sexual activity with anyone under the age of 18;
- sexually abuse or exploit at risk children or at-risk adults;
- subject any child or at-risk adult to physical, emotional or psychological abuse, or neglect;
- engage in any commercially exploitative activities with children including child labour or trafficking;
- exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance; and
- engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

GivingTime volunteers will:

- contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Policy; and

- report any concerns or suspicions regarding safeguarding violations by any GivingTime volunteer.

Response to Safeguarding Risk

Although rare, no suspicion of abuse, harm or neglect should be ignored. Volunteers may become aware of possible abuse (or risk of abuse) when they:

- Witness an abusive act or potentially dangerous incident;
- Recognise potential abuse or indicators of abuse, neglect or harm;
- Are told about abuse by the young person, face to face, by phone or online;
- Are told about abuse by a visitor, carer, relative or friend;
- Observe online abuse on forums or discussion boards; or
- Receive a complaint.

All volunteers are required to report any safeguarding concerns as soon as they become aware of them, following the procedures set out below and/or the procedures set out in the Speak Up Policy. The young person should be fully informed and ideally, but not essentially, their permission sought prior to reporting. All incidents reported to GivingTime will be appropriately recorded and investigated.

Safeguarding Risk	Action Required
If there is an imminent risk of harm to an individual	The emergency services should be called immediately.
If there is a disclosure of Female Genital Mutilation (FGM) by the young person	You must notify the Police immediately using 101 and pass on the information. A report can then be submitted using the Giving Time Concern or Incident form and process
You have any concerns about the potential abuse of a young person	**Coach action:** • **Recognise:** Identify that the individual may be describing abuse, even when they may not be explicit. • **Reassure:** Stay calm, listen, believe and show empathy. Give the individual time to speak. Reassure the individual that it will be taken seriously and explain that there is a duty to report the issues internally and what may happen next. Do not promise confidentiality as it's likely concerns will have to be shared further. • **Record:** Write up notes of the conversation clearly and factually as soon as possible after the conversation. Try to capture as much conversation verbatim as possible. Do not probe for more information. • **Report:** Submit a GivingTime Concern or Incident Form by logging into the GivingTime coaches portal and clicking on the link (https://forms.office.com/e/EmnSUa6rAU) and providing the details required as outlined in Appendix 2 **GT Safeguarding Officer action:** On receipt of a report of potential abuse, the GT Safeguarding Officer should:

	• Review the information provided in the GivingTime Concern or Incident Form within 48 hours • Discuss with GivingTime admin or the referrer as appropriate and agree whether any action is needed or not and document this decision. • If action is needed, contact the relevant school's Safeguarding Officer and keep a record of the conversation. The school and/or the Police will carry out enquiries or investigations. Under no circumstances should a GivingTime volunteer attempt to investigate any suspicions or disclosures of abuse. Your role is to record the information without bias or judgement Confidentiality must be maintained and details of any potential abuse only shared with those who need them to report and refer the matter, and external safeguarding agencies as appropriate.
You have any concerns about the potential abuse of a young person AND the allegation of abuse is against a GivingTime colleague or member of the GivingTime management team.	Action should be taken, even if the allegation is against a GivingTime colleague. If there is a concern that a member of the GivingTime management team is involved in abuse, the GivingTime Speak Up Policy and Procedure should be followed. The GT Safeguarding Officer will report the concerns to the Chair of the Board of Trustees, who will decide what action to take. This may include: • Suspending the volunteer without prejudice; • A referral of the allegation to the school; and/or • A referral to the Police for investigation. No internal procedure such as a disciplinary investigation will be initiated until after the investigation of abuse, or when the leading authority advises it is appropriate.

SAFEGUARDING AND DATA PROTECTION

The following of this Policy may involve GivingTime collecting information which is Personal Information or Sensitive Personal Information (each as defined in the GivingTime Data Protection Policy). GivingTime may process Sensitive Personal Information when providing its services (i) in order to protect the vital interests of the individual where they are incapable of giving consent; (ii) for reasons of public interest to safeguard children or individuals at risk or the prevention or detection of an unlawful act; or (iii) in order to carry out the obligations and exercise the specific rights of the data controller or the individual in the field of social protection law.

For more information please see the GivingTime Data Protection Policy, which also includes the retention period for safeguarding data.

For more information about GivingTime sharing safeguarding data please see GivingTime's Data Privacy Impact Assessment on the 'Transfer of Young People's Data for Safeguarding Purposes'.

REVIEW

We are committed to reviewing this Policy annually.

Reviewed: October 2026
Next review: December 2026

Appendix 1: Recognising Abuse, Neglect and Exploitation

What is abuse and neglect?
Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a young person by inflicting, or by failing to act to prevent, significant harm to the individual. Individuals may be abused in a family, or in an institutional setting by those known to them or more rarely by a stranger. It is important to note that this abuse can be child-on-child abuse and can manifest in any of the categories given below. The terminology of 'bullying' is now referred to under any of the abuse categories given below.GivingTime recognises that abuse is abuse and should never be tolerated or passed off as "banter", "having a laugh" or similar.

Physical abuse
Physical abuse is the causing of physical harm to an individual. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a young person they are looking after.

Emotional abuse
Emotional abuse is persistent emotional neglect or ill-treatment that has severe or persistent adverse effects on an individual's emotional development. It may involve conveying to a young person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may involve the imposition of age or developmentally inappropriate expectations on a young person. It may involve causing an individual to feel frightened or in danger, or exploiting or corrupting an individual (this can include bullying and cyberbullying)

Sexual abuse
Sexual abuse is any act that involves an individual in any activity for the sexual gratification of another person, whether it is claimed that the individual either consented or assented. Sexual abuse involves forcing or enticing a young person to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact. They may include non-contact activities, such as involving young persons in looking at, or in the production of indecent images, or in watching sexual activities, using sexual language towards a young person or encouraging a young person to behave in sexually inappropriate ways. Sexual abuse can happen online and sexual abuse of children by other children is a safeguarding issue.

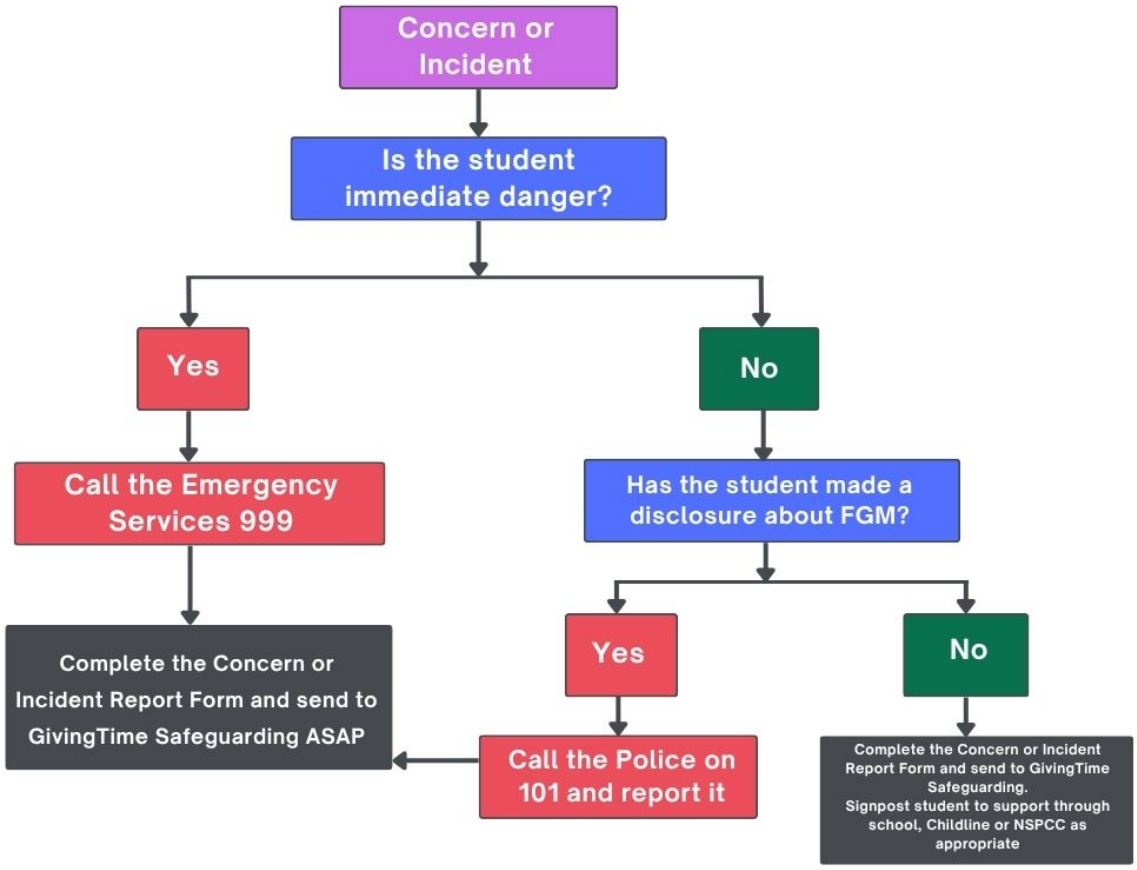
Neglect
Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in an impairment of the individual's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, to protect an individual from physical harm or danger, or to ensure access to appropriate medical care or treatment. It may also include neglect of or failure to respond to an individual's basic emotional needs.

In addition to the four major forms of abuse set out above, GivingTime recognises the following specific safeguarding issues for young people:

- young person missing from education;
- young person missing from home or care;
- child on child abuse;
- child sexual exploitation;

- child criminal exploitation;
- Online abuse;
- domestic violence and witnessing domestic violence;
- drugs;
- fabricated or induced illness;
- faith abuse;
- female genital mutilation;
- forced marriage;
- gangs and youth violence;
- gender based violence/violence against women and girls;
- mental health;
- Prejudice-based harm;
- private fostering;
- preventing radicalism;
- sexting;
- teenage relationship abuse;
- modern slavery, exploitation and trafficking;
- upskirting; and
- initiation/hazing violence and rituals.

Appendix 2: Reporting Flowchart



Appendix 3: GivingTime Concern or Incident Form

https://forms.office.com/e/EmnSUa6rAU

Your name:

Your contact phone number:
Your email address:
Concern or Incident relates to:
Student full name:
Student school:
Student year group or age:
Student gender:
Coach name:
Date of Concern or Incident:
Time of Concern or Incident:
Location:
Description of Incident:

Witnesses (if applicable):