

10,000 Interns Foundation

Company number: 13240146
Registered charity number: 1199061

(“The Foundation”)

Safeguarding policy

Last updated: 10 July 2023 version updated on 6 March 2024
Approved by: <i>The Trustee Board at their 6 March 2024 meeting, as recorded in the Minutes</i>
Review: The policy must be reviewed annually and updated as necessary

Introduction

Activities of 10,000 Interns Foundation

1. The Foundation is established as a charitable company limited by guarantee. Its governing document is a set of Articles of Association last amended by special resolution of the members passed on 10 July 2023¹. In furtherance of its charitable objects, the Foundation offers paid work experience across a wide range of industries, primarily for young persons who are Black African, Black Caribbean and/or Black British, including those of mixed Black heritage. In furtherance of its updated objects, the Foundation also provides, or plans do so in the future, work experience to underprivileged and socially and economically disadvantaged persons; persons with a disability; and older people.

The Trustees

2. It is not envisaged that the Trustees of the Foundation will have any direct contact with beneficiaries, including vulnerable beneficiaries, save very occasionally where the Trustees might visit partner organisations and/or training providers. However, if such circumstances arise, the Trustees will comply with the relevant sections of this safeguarding policy and the relevant safeguarding policy (and health and safety policy, as appropriate) of the relevant partner organisation, the training provider and/or such other relevant third party.

¹ The amendments became effective on 18 December 2023, upon the Charity Commission having given consent to the amendment to the Foundation’s objects

This policy

3. Through adherence to this policy the Trustees demonstrate the Foundation's commitment to safeguarding individuals from harm, including beneficiaries; staff, volunteers and other people who come into contact with the Foundation.
4. The fundamental principle that underpins this policy is that all individuals without exception have the right to be free from harm and the right to protection from any such harm. The aim of this policy is to ensure that no one is harmed in any way through their contact or relationship with the Foundation. All Foundation representatives (including Trustees, employees, volunteers, partner organisations, training providers and other third party organisations) must ensure they not only understand, but also act in line with this policy.

Definitions

5. **Safeguarding** is a broader term than protection, as it also includes prevention. The promotion of welfare is paramount. For the purposes of this policy, safeguarding includes the Foundation's representatives taking all reasonable measures to ensure that the risk of harm is minimised and, where there are concerns or specific incidents disclosed or observed, taking appropriate actions as necessary.
6. Further to definitions provided in the [Department of Health "No Secrets: guidance on protecting vulnerable adults in care"](#) publication, this policy has the following focus and scope:
 - **Harm**, which *"should be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development."*
 - **Abuse**, i.e. *"a violation of an individual's human and civil rights by any other person or persons."*
7. Harm and abuse can be physical, verbal or psychological in nature, and inflicted through a single act or repeated acts. They can be planned or reactive, intentional or unintentional, and via an act of neglect or an omission to act. They may occur when a person is persuaded to do something to which they have not consented or cannot consent. *"Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it."*
8. The term **"vulnerable beneficiaries"** includes children and young people; people with physical or learning disabilities; people with a physical or mental illness (chronic or otherwise, including depression, anxiety, addiction to alcohol or drugs); older people; and those with a reduction in physical or mental capacity.

Scope

9. As per the Charity Commission guidance on safeguarding (latest version as at the date of adoption of this policy (last updated 1 June 2022) entitled “Safeguarding and protecting people for charities and trustees” (“Safeguarding Guidance”) – link at paragraph 32 below - safeguarding is a priority for all Trustees and their responsibilities are not confined to vulnerable beneficiaries:

“Protecting people and safeguarding responsibilities should be a governance priority for all charities.

As part of fulfilling your trustee duties, you must take reasonable steps to protect people who come into contact with your charity.”

10. Consequently, this policy applies equally (as appropriate) to the Trustees, staff, volunteers and to partner organisations, training partners and other third party providers and all who come into contact with the Foundation.

11. In its Safeguarding Guidance the Charity Commission expects trustees to ensure their charity:-

- *has appropriate policies and procedures in place, which are followed by all trustees, staff volunteers and beneficiaries*
- *checks that people are suitable to act in their roles*
- *knows how to spot and handle concerns in a full and open manner*
- *has a clear system of referring or reporting to relevant organisations as soon as concerns are suspected or identified*
- *sets out risks and how they will be managed in a risk register which is regularly reviewed*
- *follows statutory guidance, good practice guidance and legislation relevant to their charity [see the guidance referred to in the main body of this policy and the additional guidance referred to at the end of this policy]*
- *is quick to respond to concerns and carry out investigations*
- *does not ignore or downplay failures*
- *has a balanced trustee board and does not let one trustee dominate its work – trustees should work together*
- *makes sure protecting people from harm is central to its culture*
- *has enough resources, including trained staff/volunteers for safeguarding and protecting people*
- *conducts periodic reviews of safeguarding policies, procedures and*

practice

Procedures

12. The procedures outlined below have been prepared with a view to ensuring that the Trustees comply with the above mentioned expectations of the Charity Commission as set out in its Safeguarding Guidance.

Code of conduct

13. It is expected that the Trustees, staff, volunteers, partner organisations, training partners and other third party providers and all who come into contact with the Foundation:-
 - a. act with integrity, respect and honesty;
 - b. take a collaborative, friendly and open approach, working together (as appropriate) to deliver the activities of the Foundation in furtherance of the Foundation's objects;
 - c. are inclusive and respect diversity;
 - d. value the contribution of all who are involved in the delivery of the activities of the Foundation; and
 - e. aim to give all those who they come into contact with in connection with the work of the Foundation a positive experience.

Designated responsibility

14. All Trustees of the Foundation are collectively responsible for ensuring that the Foundation meets its safeguarding obligations. However, responsibility for taking the lead on safeguarding issues and reporting accordingly to the board shall be delegated to a Designated Safeguarding Officer.
15. Rebecca Ajulu-Bushell shall be the Foundation's Designated Safeguarding Officer. She shall be responsible for reporting any concerns, queries or reports relating to safeguarding to the Trustee responsible for Safeguarding: Oluwole Olatunde Kolade or, if more appropriate, to another Trustee.

Assessing risks

16. The Foundation's safeguarding risks shall be assessed in the light of its activities.
17. All risks should be identified in a risk register which is reviewed and updated accordingly (a) if a safeguarding incident occurs and (b) each time this policy is reviewed (as per paragraph 28 below).

Recruitment of Trustees, staff and volunteers

18. The Trustees will ensure that robust procedures are in place when recruiting and selecting new Trustees (and also any staff and volunteers – although at the date of adoption of this policy it is not intended that the Foundation will have any employees or volunteers) to ensure that they are suitable and legally able to act in their positions. These include:-

- Obtaining a basic Disclosure and Barring Service (“DBS”) check before any new Trustee, staff member or volunteer is recruited- see the link below (unless the person in question already has a standard or enhanced DBS certificate by virtue of his/her occupation or involvement with another organisation):

<https://www.gov.uk/guidance/basic-dbs-checks-guidance>

- Obtaining references, as deemed necessary appropriate;
- Checking, as deemed necessary/appropriate, any gaps in work history;
- Ensuring that any prospective new Trustee is eligible to act as a Foundation trustee by asking him/her to complete and sign the Charity Commission Trustee eligibility declaration (“Eligibility Declaration”)– see the link below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820778/Trustee_Declaration_Form.pdf

- Obtaining, as considered necessary/appropriate, basic DBS certificates for existing Trustees, staff and volunteers) each year or at such other intervals as the Trustee board considers appropriate;
- Asking existing Trustees to complete and sign the Eligibility Declaration each year (or at such other intervals as the Trustee board considers appropriate) to ensure that they are still eligible to act as Foundation trustees; and
- Ensuring that any staff from overseas have a right to work in the UK – see the link below:

<https://www.gov.uk/check-job-applicant-right-to-work>

Specific safeguarding procedures in relation to the work of the Foundation

19. When assessing/vetting potential partner organisations and training providers or other third party providers (together “relevant third party”) the Foundation assesses whether they have appropriate systems of control including adequate safeguarding policies. As of the date of adoption of this policy this will include requesting the following safeguarding information from all potential relevant third parties:

Do you have a specific safeguarding policy that complies with relevant sector obligations and best practice regarding safeguarding?

Please provide a copy of your safeguarding policy.

Please provide details of any safeguarding incidents involving your organisation to date and how they have been resolved.

20. Any queries or concerns that might arise from the answers to the above should be raised with the relevant third party. The queries or concerns and the answers provided by the relevant third party should then be reported to the Trustees. The Trustees will then decide whether or not it is appropriate in all the circumstances for the Foundation to proceed with a proposed arrangement with the relevant third party.
21. The safeguarding processes relating to relevant third parties must be robust and compliant with current law and best practice; proportionate and appropriate for the vulnerability of the beneficiaries in question (as relevant); and suitable for the context within which the relevant third party is working.
22. If during the course of an arrangement with a relevant third party its safeguarding policy and/or procedures are felt to be inadequate at any stage the Foundation should request that the relevant third party amends its safeguarding policy and practices. If the relevant third party fails to do so, the Foundation should seek to terminate the arrangement (in accordance with the terms of the agreement/contract that the Foundation has with the relevant third party).
23. The Trustees must ensure that each relevant third party that enters into an arrangement with the Foundation agrees to the following procedures:
 1. *As soon as is possible in all the circumstances, [name of relevant third party] shall inform the Foundation of any safeguarding concerns or incidents that arise in connection with its arrangement with the Foundation.*
 2. *If any safeguarding concerns or incidents arise during the course of the Foundation's arrangement with [insert name of relevant third party] if, in the reasonable opinion of the Trustees of the Foundation, such concerns or incidents are not adequately addressed the arrangement/agreement shall be terminated.*
24. Please also see the section below headed "Handling and reporting safeguarding incidents and concerns".

Handling and reporting safeguarding incidents and concerns

25. All Foundation representatives (including Trustees, staff and volunteers and relevant third parties) should take seriously and respond quickly to any suspected, disclosed or observed incidents of harm or abuse to any individuals connected with the Foundation including Trustees, staff, volunteers, any relevant third parties and vulnerable beneficiaries (and beneficiaries in general).
26. All concerns, queries or reports of potential or actual harm or abuse to individuals must be reported as soon as is reasonably practical to the Designated Safeguarding Officer, the Designated Safeguarding Trustee or such other Trustee if appropriate in the circumstances, including as much information as possible regarding the incident(s).
27. Upon receipt of an incident report as referred to above, the Trustees will then:

- assess the concern, allegation or incident;
- notify, as necessary appropriate, the relevant authorities as appropriate, for example Social Services, the Police and the Charity Commission (see the Commission's guidance referred to on page 9 "*How to report a serious incident in your Foundation*" which specifically refers to reporting requirements in relation to safeguarding incidents);
- subject to, as relevant/appropriate, (a) the law, (b) the terms of the Foundation's governing document, (c) any relevant grievance or disciplinary procedures; (d) the terms of the agreement in place with a relevant third party; and/or (e) the consideration of any expert advice obtained take such other action as deemed necessary/appropriate including, but not limited to, terminating Trusteeship; terminating a contract of employment, terminating an arrangement with a volunteer and/or terminating such other arrangement with a third party;
- fully document the incident and make a record of the Foundation's actions in response; and
- put in place any new measures required to prevent similar in the future.

policy

Reviewing this

28. This policy must be reviewed by the Trustee board at least once per year. In reviewing the policy the Trustees shall consider, amongst other things:-

- assessed risks and whether the risks have changed since the policy was last reviewed;
- any actual or alleged safeguarding incidents that have occurred since this policy was last reviewed;
- whether this policy and the safeguarding procedures set out herein should be amended in any way in the light of (a) Charity Commission safeguarding guidance in place at the date of review, (b) any other relevant sector safeguarding guidance, (c) identified risks and (d) any actual or alleged safeguarding incidents referred to in the above bullet point; and
- any specific guidance given or action required by the Charity Commission or any other regulator or body.

Training

29. Awareness and update training will be arranged and provided as necessary/appropriate to ensure that the Trustees and all who may work with the Foundation are clear about their safeguarding duties and responsibilities.

Publication of this policy

30. This policy shall be posted on the Foundation's website (if any) and a hard copy shall be provided free of charge as requested by any individual or organisation.

Declaration

31. This policy shall be brought to the attention of each Trustee, staff members, volunteers and relevant third parties. Each will be asked to sign the declaration at the end of this policy by way of indicating that he/she/it has read and understood this policy and the Charity Commission guidance referred to herein.

Charity Commission guidance

32. Links to the Charity Commission guidance that is relevant in the context of this policy are set out below.

Safeguarding Guidance (also referred to at paragraph 9 above):

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

How to report a serious incident in your Foundation:

<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-Foundation>

Charity Commission guidance CC30 entitled *Finding new trustees*:

<https://www.gov.uk/government/publications/finding-new-trustees-cc30>

Charity Commission guidance entitled *Charities: how to protect children and adults at risk*:

<https://www.gov.uk/guidance/charities-how-to-protect-vulnerable-groups-including-children>

Charity Commission compliance toolkit – entitled *Protecting charities from harm – Chapter 2: Due diligence, monitoring and verifying end use of charitable funds*:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/677252/Chapter2new.pdf

Useful further reading resources

Foundation Governance Code:

<https://www.Foundationgovernancecode.org/en/front-page>

NCVO Foundation Ethical Principles:

<https://www.ncvo.org.uk/policy-and-research/ethics/ethical-principles>

Association of Charitable Foundations (ACF) Safeguarding Framework:

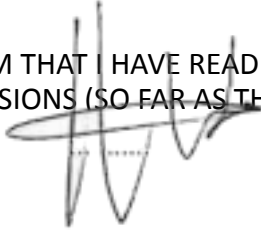
ACF's new framework to help Foundations think through their approach to safeguarding.

<https://www.acf.org.uk/news/acf-launches-new-framework-on-safeguarding-for-Foundations>

ADOPTED BY THE TRUSTEES OF THE FOUNDATION ON 10 JULY 2023 AS UPDATED ON 6 MARCH 2024

ACKNOWLEDGEMENT AND SIGNATURE OF TRUSTEE, EMPLOYEE, VOLUNTEER, RELEVANT THIRD PARTY OR OTHER PERSON OR ORGANISATION TO WHICH THIS POLICY APPLIES:

I CONFIRM THAT I HAVE READ AND UNDERSTAND THIS POLICY AND THAT I WILL FULLY ADHERE TO ITS PROVISIONS (SO FAR AS THEY ARE RELEVANT TO ME/MY ORGANISATION)



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SIGNATURE

Oluwole Olatunde Kolade (Chair, The 10,000 Interns Foundation)

DATE: 6 March 2024