



Safeguarding Policy

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Approved By:	Size of Wales Board of Trustees
Implemented By:	Size of Wales Director and Safeguarding Officer
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1. Safeguarding Policy

The purpose of this policy is to protect all people, particularly women, girls, boys, at risk / vulnerable adults and project participants, from any harm that may be caused due to their coming into contact with Size of Wales. This includes harm arising from:

- The conduct of staff or personnel associated with Size of Wales
- The design and implementation of Size of Wales’s programmes and activities

The policy lays out the commitments made by Size of Wales and informs staff and associated personnel¹ of their responsibilities in relation to safeguarding.

This policy does not cover safeguarding concerns in the wider community not perpetrated by Size of Wales or associated personnel.

This policy has been developed in accordance with:

- [DFID's enhanced Safeguarding standards](#)
- the [UN Special measures for protection from sexual exploitation and sexual abuse](#)
- UN Convention on the Rights of the Child (UNCRC).
- [Social Services and Wellbeing \(Wales\) Act 2014](#)
- Rehabilitation of Offenders Act [ROA1974](#)
- Wales' Safeguarding Procedures (which help practitioners apply the Social Services and Wellbeing (Wales) Act 2014).

2. What is safeguarding?

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

We understand it to mean protecting people, particularly women, girls, boys and adults at risk / vulnerable adults, from harm that arises from coming into contact with our staff or programmes.

Further definitions relating to safeguarding are provided in the glossary in Annex 1.

3. Scope

This policy applies to

- All staff contracted by Size of Wales
- Associated personnel whilst engaged with work or visits related to Size of Wales, including but not limited to the following: board members, consultants; freelancers, volunteers; researchers; programme visitors including journalists, celebrities and politicians appointed or recruited by Size of Wales or deemed to be representing Size of Wales in any way in Wales or worldwide.

4. Policy Statement

Size of Wales believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation, ethnicity or religion has the right to be protected from all forms of harm caused by sexual exploitation, abuse, harassment, neglect and bullying. We value diversity, confidentiality and do not discriminate against

¹ See Annex 1: Glossary of Terms for definition of "associated personnel".

any person for any reason. We will only portray people with a sense of dignity and will act with integrity, be transparent and accountable. Size of Wales does not tolerate bullying, harassment, sexual exploitation and abuse by staff or associated personnel and will implement safe programmes in an environment that supports physical health and well-being and is done in the best interests of the child / vulnerable person. We are committed to creating space and systems to nurture staff's awareness and confidence to speak out. All staff and associated representatives have a mandatory duty to report all safeguarding concerns immediately. Everyone has a responsibility for safeguarding.

Size of Wales commits to addressing safeguarding throughout its work, through the three pillars of **prevention, reporting** and **response**. Size of Wales recognises that it has a safeguarding duty of care to project participants, staff and volunteers, including where down-stream partners are part of delivery.

5. Prevention

Size of Wales will implement policies and procedures to minimise the risk of safeguarding concerns from occurring.

5.1. Ensure safe recruitment, induction and training

- Include Size of Wales safeguarding commitments in job adverts, job descriptions and terms of reference as applicable.
- Seek to recruit all paid staff and volunteers using appropriate procedures, safeguards and checks. Size of Wales will follow guidance on roles that require DBS checks. <https://www.gov.uk/government/collections/dbs-eligibility-guidance> The Education Manager and Education Outreach Officers (EOOs) are subject to enhanced DBS checks. Furthermore, any staff that are likely to visit Size of Wales forest projects overseas and meet with project participants will be required to have a basic check. This information will be included in job adverts and job descriptions.
- Assess any criminal record information that is disclosed in line with our Data Protection and Equality and Diversity policy and on the basis of whether the offences revealed are serious enough to prohibit recruitment for that particular role. People with a prior conviction for any crime against children, or sexual exploitation or abuse against an adult will not be hired by Size of Wales. Size of Wales requires re-checks every three years for relevant posts and every year for EOs upon renewal of their contracts.
- Discuss the content of any disclosure with the applicant before withdrawing any offer of employment
- Ask appropriate screening questions during selection/interview processes for relevant roles.

- Take up references for all Size of Wales posts, volunteer roles and trustees which includes a question on safeguarding.
- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and uphold Size of Wales Code of Conduct.
- Ensure staff and board members receive training on safeguarding and code of conduct at a level commensurate with their role in the organization (induction training for new staff and refresher training every 2 years as a minimum). Staff with specific safeguarding roles will have more frequent training. All Staff that have received the safeguarding induction will sign a self-declaration form (annex 8). Dates when induction and refresher training has been completed should be logged and monitored.
- Set a probationary period of (at least) six months for all staff and volunteers.
- The Safeguarding Officer and Trustee Safeguarding Officer will stay up to date with safeguarding best practice and legislation.

5.2. Staff and Volunteer Responsibilities - Code of Conduct

All Size of Wales staff, volunteers, grant recipients, partners and associated personnel will adhere to high standards of behaviour and adhere to our safeguarding policy. All Size of Wales staff, volunteers, grant recipients, partners and associated personnel will:

- Create an environment, in which children, young people and adults at risk / vulnerable adults feel safe, secure, valued and respected.
- Ensure that there is more than one adult present during activities with children, young people or adults at risk / vulnerable adults or within sight or hearing of others; always work in an open environment avoiding private or unobserved situations.
- There should be no 1:1 contact between a staff/volunteer and a young person through digital tools or messages.
- Respect a young person's right to personal privacy; being aware of personal space and keeping an appropriate distance; that physical contact with a child, young person or adult at risk may be misinterpreted.
- Consider how you develop relationships with children, young people and adults at risk / vulnerable adults, to preclude any activity which could in any way be deemed inappropriate or exploitative.
- Always take allegations of harm seriously - neither exaggerate or trivialise.
- Report all safeguarding concerns or allegations immediately. This is their mandatory duty.

All Size of Wales staff, volunteers, grant recipients, partners and associated personnel are **prohibited** from engaging in the following harmful behaviour, including but not limited to:

- Any behaviour or activity that could amount to sexual exploitation and abuse.
- Sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Any other activity that is intended to cause physical or emotional harm, neglect, humiliation or exploitation to any individual.
- Any activity, practice or behaviour that suggests staff, grant recipients or partners have abused their position of power and is engaging any individual based on inherently unequal power dynamics.
- Sexual relationships between staff-, grant recipients-, partners and any individuals that are based on unequal power dynamics are strongly discouraged since they may undermine the credibility and integrity of the work of Size of Wales.
- Discriminate against, show differential treatment or favour particular individuals to the exclusion of others.
- Use of the organisation's computers or other equipment to view, download, create or distribute inappropriate material, including but not limited to pornography.

All staff, volunteers, grant recipients and forest project partners will report safeguarding concerns in accordance with this policy.

5.3. Ensure safe programming in Wales and overseas

Size of Wales will:

- Design and undertake all its programmes and activities in Wales and overseas in a way that minimises the risk of harm that may arise from children, young people and adults at risk / vulnerable adults coming into contact with Size of Wales.
- Carry out risk assessments for activities both in Wales and overseas that will involve children, young people and adults at risk / vulnerable adults that include safeguarding issues.
- Embed safeguarding standards in the forest partner due diligence and project screening processes.

- Include safeguarding clauses in partnerships agreements and reporting forms. This includes (i) informing Size of Wales of all safeguarding concerns or complaints related to Size of Wales funded projects or programmes overseas, or about our representatives and (ii) follow safe communications and online security guidelines and seek informed consent (see Annex 4) and (iii) follow up on reports of safeguarding concerns promptly and according to due process.
- For any communications work, Size of Wales will seek consent from the child and parents / schools when working with children and adults at risk / vulnerable adults. This includes project participants in overseas projects. See Annex 4 for further information.
- Ensure that it shares its safeguarding policy widely with relevant stakeholders (donors, partners, schools) and promotes accessible ways to receive safeguarding concerns, including child friendly versions of the policy. Children, young people and adults at risk / vulnerable adults should know how to approach adults if they are facing difficulties, believing they will be effectively listened to and that their concerns will be taken seriously and acted upon.
- Ensure that safeguarding policy and Code of Conduct is included in contracts for services or goods e.g. consultancy contracts. A copy of the policies will be shared with the relevant individual(s) and they must confirm that they have read and understood them.

6. Reporting concerns or allegations

Size of Wales staff and associated representatives have a **mandatory duty to report all safeguarding concerns or allegations immediately**. This is regardless of whether it is internal to Size of Wales or not. It is not the responsibility of staff to decide whether or not exploitation or abuse has occurred, but they must pass their concerns on.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Size of Wales Whistleblowing Policy. Deliberate false allegations are a serious disciplinary offence.

Size of Wales will also accept complaints from external sources such as members of the public, partners and official bodies. It is essential that confidentiality is maintained.

Size of Wales will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with both in Wales and overseas. There is guidance on how to receive safeguarding concerns in Annex 2.

6.1. How to report a safeguarding concern

Where a member of staff (or volunteer or trustee) has a concern:

- That a child may be being abused or at risk of harm;
- That an adult at risk may be being abused or at risk of harm; or
- That an adult working with children or adults at risk / vulnerable adults may pose a risk of harm to those children or adults at risk / vulnerable adults,

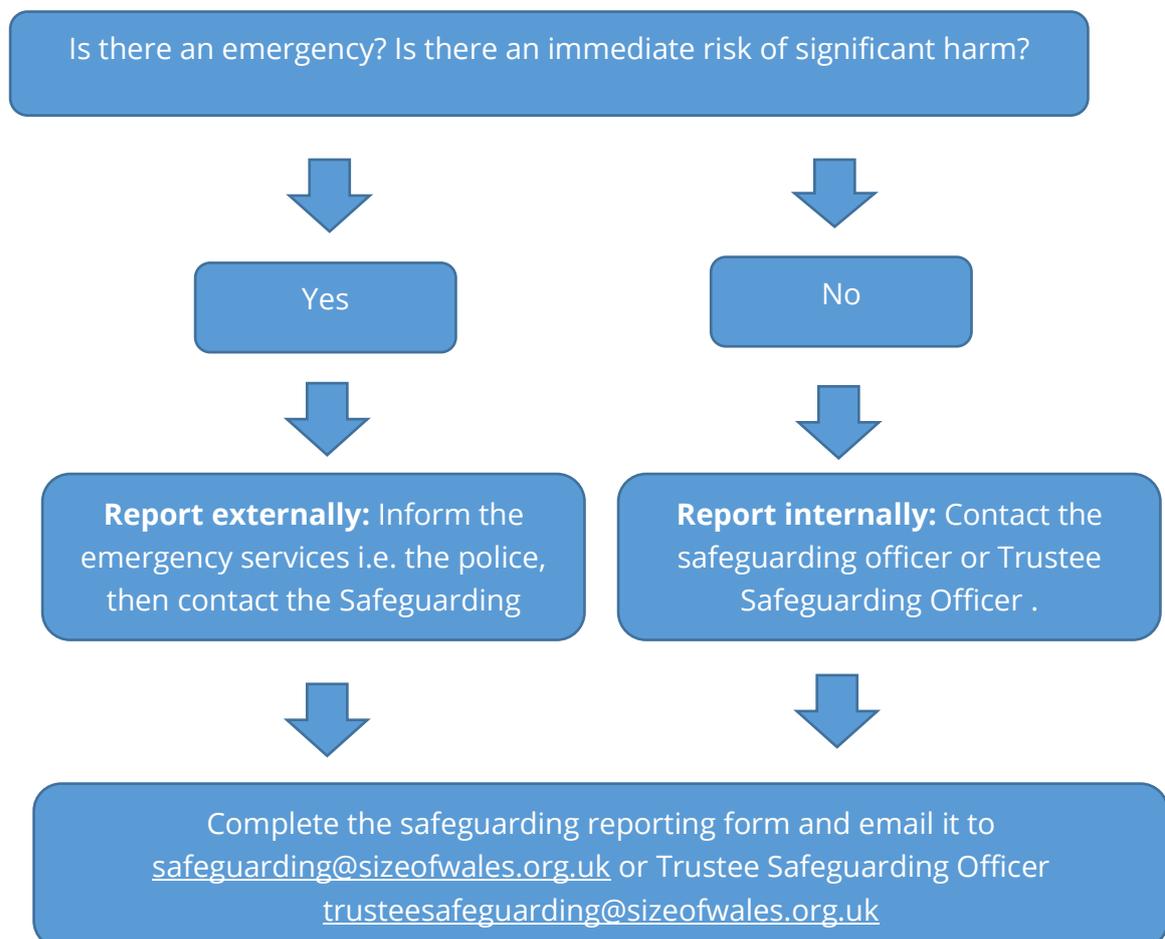
they should immediately contact the Size of Wales Safeguarding Officer, the Trustee Safeguarding Officer or any other trustee, either face to face, or through the email addresses or telephone number specified below. Staff should use the form found in Annex 3 to report concerns.

Contact details:

Safeguarding Officer: Barbara Davies Quy, safeguarding@sizeofwales.org.uk 07811 460 269

Trustee Safeguarding Officer: Sarah Evershed (Trustee)
trusteesafeguarding@sizeofwales.org.uk Phone number: 07841 581448

If it is an emergency and there is an immediate risk of significant harm, a member of staff should report the case externally to emergency services immediately. If there is no immediate risk, inform the case internally to the Safeguarding Officer.





The Safeguarding Officer or Trustee Safeguarding Officer will record all allegations, disclosures and concerns.

7. Responding to a concern or allegation

Size of Wales' Board of Trustees has overall safeguarding responsibility for the charity. The Trustee Safeguarding Officer will have safeguarding governance responsibility to the Board. The Safeguarding Officer will work with the Trustee Safeguarding Officer to deal with any safeguarding issue or concern.

The Safeguarding Officer and the Trustee Safeguarding Officer will take all concerns and allegations of abuse seriously and will respond appropriately in order to ensure the safety of children and adults at risk / vulnerable adults who come into contact with Size of Wales. A meeting will be held by telephone within 24 hours to assess the concern and consider if further information is required.

An allegation may relate to a person who works with children or adults at risk / vulnerable adults who has:

- Behaved in a way that has harmed a child / adult at risk, or may have harmed a child / adult at risk;
- Possibly committed a criminal offence against or related to a child / adult at risk; or
- Behaved towards a child, children or adult at risk in a way that indicates they may pose a risk of harm to children / adults at risk / vulnerable adults.

7.1. Reporting allegations in the UK

If the allegation is related to a safeguarding concern in the UK, the Safeguarding Officer and the Trustee Safeguarding Officer (in their place) must report all allegations of abuse against staff working in the United Kingdom to the Local Authority Designated Officer (LADO) within 24 hours of the allegation coming to light (see annex 7 for contact details).

Any representative who believes a child or adult at risk / vulnerable adult is in immediate danger of significant harm in the UK should contact the police by phoning 999.

- Size will report allegations when there is *reasonable cause to suspect* abuse, neglect or harm. Size might delay making a report to check whether there is

enough information to constitute reasonable cause following initial discussions about a concern. The delay should be time limited.

- Size might run those internal checks and decide that the issue can best be addressed by an internal response; improved supervision, a training event, or that it is a malicious report or a misinterpretation of the situation. The situation and the response should be logged. Monitor for the required improvement.
- Size of Wales may not report a concern, if the subject of the concern is an adult who has capacity and therefore has the right to make decisions that others might believe to be risky. They may state that they are able to protect themselves (an adult is only an adult at risk if they are unable to protect themselves from abuse or neglect) and will take steps to do so. The individual has the right to change their mind and ask for a report to be made at a later date.

The situation will be thoroughly documented in Size of Wales' safeguarding tracking document. Wherever possible, the views and wishes of the individual and their chosen outcomes identified. Decision-making, time limits and conditions all logged and adhered to. If in any doubt, speak to the local authority social services department.

7.2. Reporting allegations overseas

If the allegation occurred overseas, Size of Wales will follow the referral pathways identified by partners in their safeguarding policies. Size of Wales will provide support to those that have reported safeguarding concerns overseas, especially as this could have serious local repercussions and put them at risk.

7.3. Consent for making a safeguarding report

In the case of a child

For safeguarding purposes, there is no requirement for consent to make a safeguarding report about a child. However, it is considered good practice to seek a child's consent to make a safeguarding report about them to Social Services or relevant safeguarding bodies in overseas countries, subject to their age and understanding (see Annex 4 - informed consent). In any situation where consent is refused, this should be noted on the report form to Social Services / relevant in country authority. It is important to have a good rationale for why the report is being made without the individual's consent and this decision logged in internal records. This may include:

- a crime has been committed;
- the situation, if not reported, would put other people at risk of similar abuse (e.g. the suspected perpetrator is known to be working with other people who are at risk in similar circumstances);

- the individual is subject to undue influence (possibly from the perpetrator or a person with an interest in protecting them), pressure or coercion, which discourages them from giving consent.

If a report is made, the child should be informed of what actions will be taken and why, and contact maintained (if possible) with the individual to reassure them and offer support throughout the process.

If Size does not report, this decision should be recorded, the Safeguarding Officer should discuss safeguarding options with the individual and other routes or options, possibly through other agencies. The individual should be reminded that they have the right to change their mind and a report could be made at a later stage.

In the case of an Adult at risk/ vulnerable adult

When the report is about an adult, it should be assumed that the adult has the capacity to make decisions for themselves unless this has been assessed otherwise, and therefore has the right to be asked for, or to withhold, their consent. Consent should therefore be obtained to make a safeguarding report on an adult UNLESS:

- a crime has been committed
- the situation, if not reported, would put other people at risk of similar abuse (e.g. the suspected perpetrator is known to be working with other people who are at risk in similar circumstances)
- the individual is subject to undue influence (possibly from the perpetrator or a person with an interest in protecting them), pressure or coercion, which discourages them from giving consent.
- If a report is made, the adult at risk / vulnerable adult should be informed of what actions will be taken and why, and contact maintained (if possible) with the individual to reassure them and offer support throughout the process.
- If Size does not report, this decision should be recorded, the Safeguarding Officer should discuss safeguarding options with the individual and other routes or options, possibly through other agencies. The individual should be reminded that they have the right to change their mind and a report could be made at a later stage.

7.4. Reporting to the Charity Commission

Size of Wales Board of Trustees will be informed of all allegations of abuse (as defined above) involving a member of staff or partner. They are responsible for making a serious incident report to the Charity Commission as required by charity registration [Serious incident reporting](#).

7.5. Reporting to Donors

Size of Wales will report any safeguarding concerns to donors. According to the Wales and Africa Safeguarding policy, Size of Wales must report all cases of safeguarding concerns received to the Wales and Africa team within 24 hrs of receipt of a report and also upon closure of any investigation or procedures. This information would include only non-identifying summarised detail. Size of Wales must provide an annual summary of all safeguarding cases reported and the outcome of each case. Size will also undertake regular audit of these grant aided agencies and report the outcomes to Wales and Africa. For work in Wales funded by the Welsh Government, we must follow the [Keeping Learners Safe](#) (KLS) guidance which aligns with the [Wales Safeguarding Procedures](#). For further information, see Annex 9.

7.6. Disciplinary Measures

Where a Size of Wales representative is the subject of an allegation, in some instances, the member of staff will be suspended until an investigation is completed. Suspension does not imply guilt but protects all parties. Size of Wales will apply appropriate disciplinary measures, including dismissal to staff found in breach of policy. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, Size of Wales will reach a decision based upon the information that is available which could suggest that on a balance of probability it is more likely than not that the allegation is true.

7.7. Support to survivors and staff

Size of Wales will offer support to survivors of harm caused by staff or associated personnel, by sharing details of specialist agencies if appropriate and requested. When appropriate, keep the person raising the concern/allegation updated of progress and resolution, unless:

- the situation means we must respect the privacy of individuals who may be affected;
- the survivor has expressly indicated a preference not to receive contact;
- the report has been made anonymously and this is not possible.

Where the survivor is a child or otherwise unable to make decisions, support will be provided by an appropriate guardian, carer or advocate².

² In Wales, anyone who is the subject of safeguarding procedures, and may have barriers to understanding fully, including all children, has the right to an advocate, whether informal (carer, family member, support worker in other role) but “appropriate”, which means not involved in the safeguarding concern in any way.

Size of Wales recognises that Size of Wales staff who have had to respond to a safeguarding allegation may find the situation stressful and upsetting. We will support our staff by providing an opportunity to talk through their anxieties with the Safeguarding Officer and to seek further support as appropriate. See Annex 7 for further information on referrals.

7.8. Reporting bullying or harassment

Size of Wales staff are entitled to work in an environment that is safe, secure and free from harassment and abuse. Size of Wales has a number of policies in place to support this and these are detailed in the Staff Handbook. If a staff member is concerned that a staff member may be harassing or bullying another staff member, or making other feel unsafe or uncomfortable, they should speak to the Director or to a Trustee.

8. Monitoring and Evaluation

Size of Wales Board of Trustees is ultimately responsible for safeguarding for Size of Wales. Size of Wales will regularly review the effectiveness of its safeguarding practice and assess knowledge and understanding of staff and stakeholders. All safeguarding decisions will be documented and reviewed capturing lessons learnt. Size of Wales Board of Trustees will review safeguarding issues as part of the quarterly monitoring of the safeguarding risk register. A quarterly review meeting will be held between the Safeguarding officer and Size of Wales Director where needed. Safeguarding will also be discussed at the Education Outreach Officers meetings that are held on a termly basis.

9. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis, only and should be kept secure at all times. A designated folder will be set up which can only be accessed by the Safeguarding Officer and Trustee Safeguarding Officer.

Size of Wales will only share information about a child with adults who have parental responsibility, if this does not place the child at further risk of harm. This should be discussed with the relevant local authority. Information may also be shared with parent/guardian, where it is necessary in order to safeguard the child from harm. All Size of Wales staff must be aware that Size has a professional responsibility to share information with other agencies in order to safeguard children. Information about an adult should be shared only with whom they have expressly requested it.

Annex 1: Glossary of Terms

Adult at risk / vulnerable adult: A vulnerable adult (international development context) is an individual aged 18 years or over who is at greater risk of significant harm due to factors such as gender, age, mental or physical health, or as a result of poverty, inequality or experience of displacement or crisis. Safeguarding vulnerable adults is the process of protecting adults from abuse or neglect, enabling adults to maintain control over their lives and make informed choices without coercion.

A vulnerable adult (UK context)¹ is an individual aged 18 years or over 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.

Beneficiary / Project participant

Someone who directly receives goods or services from Size of Wales' programmes in Wales or overseas. Note that misuse of power can also apply to the wider community that Size of Wales serves and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18.

Young person

In the UK, a young person is someone aged 16 or 17 who are living independently. They are however still defined as children. Overseas, a young person can often range from age 18-24.

Harm

Psychological, physical and any other infringement of an individual's rights. The following is a non-exhaustive list of examples for each of the categories of abuse:

- **physical abuse** - hitting, slapping, undue restraint, or inappropriate sanctions;
- **sexual abuse** - the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual exploitation** - any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.
- **psychological abuse** - Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling,

constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse ([ST/SGB/2003/13](#))

Safeguarding

In the **UK**, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.³ In **Wales** ..."safeguarding means preventing and protecting children and adults at risk / vulnerable adults from abuse or neglect and educating those around them to recognise the signs and dangers".⁴

In **international development**, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

"Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur".

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Safeguarding puts project participants / beneficiaries and affected persons at the centre of all we do.

³ NHS 'What is Safeguarding? Easy Read' 2011

⁴ <https://www.safeguarding.wales/glossary.html>

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individuals' choice how they wish to identify themselves.

Associated Personnel - All paid or unpaid staff, volunteers, freelancers, researchers, consultants, contractors, board members, programme visitors including journalists, celebrities and politicians appointed or recruited by Size of Wales or deemed to be representing Size of Wales in any way in Wales or overseas.

Size of Wales partners: Refers to programme delivery partners that Size of Wales have a funding agreement with to deliver programmes overseas.

Informed Consent: the capacity to give consent based on agency and all available information, according to the age and evolving capacities of the person. The person must fully understand the purpose of the activity for the consent to be informed.