



# Safeguarding Governance Framework

Unique reference number: PP-SG-FW-001

Document Owner: Chris Roach - Head of Safeguarding

Version: 1.0

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## Introduction

### Our Safeguarding Governance Approach

Our governance approach includes safeguarding policies and procedures, oversight from Executive Directors (ED) and the Audit & Risk Committee (ARC), and the Board of Trustees as well as clearly defined roles and responsibilities.

### Purpose

Guide Dogs as a charity have specific obligations to ensure the safety and well-being of all employees, volunteers and service users. The Trustees recognise that they have responsibility to ensure that the work of Guide Dogs and the undertaking of its operation and service provision does not result in any harm, abuse or exploitation of any kind. The Framework together with our Safeguarding Policies sets out the approach to achieve our objectives. It also highlights the responsibility of safeguarding oversight management, administration and supervision devolved by the Trustees to other areas within the organisation.

This Framework

- Sets out clarity regarding the governance of safeguarding arrangements and responsibilities.
- Acts as a reference point to safeguarding policies, procedures and controls documents.
- Establishes the accountabilities of safeguarding advice, administration, management and risk.
- Defines the safeguarding roles and responsibilities of the Trustees, ED, ARC, the Safeguarding Team, and other operational stakeholders.

There are various matters of governance which are reserved to the Board of Trustees. These are detailed and set out in Guide Dogs' Reserved Matters document. This Framework compliments the Reserved Matters. In the event of any conflict between the two the Reserved Matters shall prevail.

This Framework has been approved by Trustees and will be subject to an annual review.

## **Objectives**

- **Ensuring legal compliance:** The framework in conjunction with our policies should ensure that Guide Dogs is complying with all legal and regulatory safeguarding requirements, which are outlined in Appendix A.
- **Maintaining Guide Dogs' reputation:** The framework in conjunction with our policies should help Guide Dogs to manage reputational risks by ensuring that it operates in an ethical and transparent manner in respect of all safeguarding activities.
- **Protecting stakeholders:** The framework in conjunction with our policies should ensure that the interests of Guide Dogs' stakeholders, including but not limited to service users, staff, volunteers, and donors, are protected from potential harm or loss.
- **Promoting accountability:** The framework in conjunction with our policies should help Guide Dogs to promote accountability and transparency by ensuring that safeguarding processes are documented, reviewed, and reported regularly to relevant stakeholders.
- **Knowledge and training:** The framework in conjunction with our policies should ensure that safeguarding staff and volunteers receive the necessary knowledge, skills, and training to effectively manage undertake their roles and responsibilities.

## **Guide Dogs Adopted Key Safeguarding Principles**

Guide Dogs has adopted a set of Key Safeguarding Principles which operate to ensure compliance with its legal and regulatory safeguarding obligations. The principles are aimed at ensuring that children, young

people and adults, whether they are service users, staff, volunteers or others who come into contact with Guide Dogs are treated with respect and are free from all forms of harm, abuse or mistreatment.

Guide Dogs approach to safeguarding practice requires that the key principles are considered in the administration of its service provision and activities.

The key principles are:

1. Recognition and Prevention of abuse
2. Responding to abuse or harm
3. The documenting and reporting of abuse
4. Low level concerns and whistleblowing
5. Allegations against staff and volunteers
6. Safe working practices
7. Recruiting staff and volunteers safely
8. Professional development of staff and volunteers

The full version of the Key Safeguarding Principles is held on the Guide Dogs Knowledge Hub (Ref: PPSGS001).

## **Safeguarding Policies and Procedures**

A list of our current Safeguarding policies and procedures are outlined in **Appendix B**.

## **Delegation of Responsibility and Accountability**

The responsibility for maintaining safeguarding practice in line with the safeguarding principles are outlined below.

### **Role of the Board of Trustees**

The Trustees are ultimately accountable for the organisation's obligations to comply with regulatory and legal obligations including obligations of safeguarding practice.

The Board sets and approves the strategy to be adopted towards safeguarding standards. In accordance with the Matters Reserved for the Board of Trustees (November 2018), the day-to-day approach, and

oversight of the management of safeguarding practice has been delegated to ED. In turn the ED will be responsible for administering its overall safeguarding strategy.

### **Role of the Audit & Risk Committee**

The implementation and monitoring of the charity's safeguarding principles have been delegated to ARC by the Board of Trustees. It will also oversee the risk management and reporting of Guide Dogs strategic and corporate safeguarding risks.

### **Role of Executive Directors**

ED are responsible for implementing the Safeguarding Principles as part of its strategic objectives under the direction of ARC. This includes the submission of an annual report to ARC covering current activities, priorities, risks, and mitigations for the Safeguarding Team.

### **The Safeguarding Team**

The Safeguarding Team comprises of a group of individual employees who have professional knowledge and experience in safeguarding practice. The team are responsible for the day-to-day management of safeguarding practice acting upon all reported cases relating to actual harm.

The terms of reference of the Safeguarding Team Terms of Reference are set out at Appendix C.

## **Reporting and Escalation**

### **Responsibility and Accountability for Reporting to External Agencies**

The organisation is subject to obligations to report safeguarding related activity or instances of safeguarding concern to various external parties. As the obligation to report is an obligation of the organisation the ultimate responsibility for reporting is that of the Trustees.

Save for reporting requirements to the Charity Commission (fully set out at Appendix D) the Trustees responsibility for decision making and the administration of reporting is delegated to the Safeguarding Team.

The Safeguarding Team in pursuance of its delegated responsibilities for reporting may, where it deems it necessary or prudent, consult with the ED and/or Trustees and take legal advice from the organisation's In-House Legal Team.

In accordance with the Charity Commission guidelines, Guide Dogs will ensure all senior incidents will be reported and escalated as set out below. The Charity Commission within its guidance (in the context of safeguarding) describes a serious incident as “an adverse event, whether actual or alleged, which results in or risks significant harm to the charity's beneficiaries, staff, volunteers or others who come into contact with the charity through its work.”

### **Board of Trustees**

The Board of Trustees are responsible for protecting those connected with Guide Dogs from harm, abuse, and mistreatment. This includes people who benefit from Guide Dogs work and services, staff, volunteers, and other people connected to Guide Dogs activities. It has established ARC to support it in its responsibilities for the oversight of safeguarding. The Board of Trustees are accountable to The Charity Commission.

### **Audit & Risk Committee**

ARC is responsible for reviewing and managing safeguarding incidents to ensure they have been dealt with in accordance with our statutory requirements. It also reviews the effectiveness of our safeguarding risk reporting, processes, and controls. It provides an assessment on the level of reporting assurance to the Board of Trustees and Regulatory Bodies.

### **Executive Directors**

ED are provided with regular safeguarding reports for discussion, challenge, and monitors progress on incidents. They will ensure that safeguarding underpins all decisions made by maintaining a clear organisational and operational focus on safeguarding adults and children and making sure all statutory requirements and guidelines are met. The CEO is accountable to the Board of Trustees for all safeguarding matters.

## **Safeguarding Team (Head of Safeguarding)**

The Head of Safeguarding is responsible for co-ordinating concerns and providing monthly reports to ED, risk assessment, operational decisions, and advice and guidance. The Head of Safeguarding will also oversee Guide Dogs' investigations into safeguarding concerns.

## **Staff**

Effective safeguarding compliance depends on the commitment and co-operation of all staff, particularly within their own areas of control. Staff involved with safeguarding will be supported with the necessary training and tools to have accountability and adhere to the principles outlined in this framework. All other staff will be required to become familiar with the policy and procedure documents.

## **Whistleblowing**

To fulfil commitment to safeguarding, Guide Dogs has a whistleblowing policy, and a culture that enables issues about safeguarding and promoting welfare to be addressed.

Guide Dogs is committed to the highest standards of openness, probity, and accountability. In line with that commitment, Guide Dogs recognises that an important aspect of accountability and transparency is a mechanism to enable staff, volunteers, and service users to raise concerns about breaches or failures in a reasonable and effective manner.

There must be an awareness of the vulnerability of children, and adults throughout Guide Dogs. Our policy and procedures outline how to raise a concern, which can include safeguarding.

The Public Interest Disclosure Act 1998 gives workers legal protection against being dismissed or penalised from publicly disclosing certain serious concerns.

## **Other Reporting Obligations**

Other reporting obligations, which are delegated to the Safeguarding Team, include reporting to Local Authorities, the Police or other external bodies stipulated through legislation or regulation.

Matters relating to Children.

Obligations of inter-agency working to safeguard and promote the welfare of children arise from various sources of legislation and are set out in a set statutory guidance issued by HM Government for each of the devolved nations. For England the “Working Together to Safeguard Children - Statutory framework: legislation relevant to safeguarding and promoting the welfare of children”. For Wales the “Working Together to Safeguard People”. For Scotland the “Getting it Right for Every Child”. For Northern Ireland the “Understanding the Needs of Children in Northern Ireland”.

Matters relating to Vulnerable Adults.

Obligations of inter-agency working to safeguard and promote the welfare of vulnerable adults arise from various sources of legislation and are set out in statutory guidance. For England issued by the Office of the Public Guardian entitled “Safeguarding Policy” and separate guidance issued by the Department of Health entitled “Care and Support Statutory Guidance”. For Scotland the “Adult Support and Protection Code of Practice and Guidance”. For Northern Ireland the “Safeguarding Vulnerable Adults a Shared Responsibility”. For Wales “Working Together to Safeguard People”.

## **Internal Reporting**

The Safeguarding Team provide reports to ED, ARC and the Board of Trustees. Reports cover the general safeguarding status and activity including staff (employee and volunteer) compliance with safeguarding training obligations, referral data and other ad hoc matters and issues as requested by those individual bodies from time to time. Reports are to be issued to ED on a monthly basis, to the Trustees Board on a yearly basis and to ARC on an ad hoc basis as and when required.

## **Escalation**

Safeguarding advice is concerned with enabling the organisation to pursue its strategic objectives efficiently in a manner which is consistent with the Safeguarding Key Principles. Whilst the Safeguarding Team’s advice is critical, essential, and should always be considered, it is advisory in nature only. Whilst the Trustees, ED and ARC may consult with the Safeguarding team on a particular matter it is those bodies who



ultimately have responsibility for decisions made. Should the Safeguarding Team feel that there is a conflict between strategic decisions and safeguarding obligations these should be escalated by the Safeguarding Team through its reporting obligations.

## **Appendix A - Our Safeguarding Statutory and Regulatory Obligations**

Safeguarding is governed by statutory and regulatory controls which include:

### **Charity Commission (CC) Guidance - Safeguarding and Protecting People (for Charities and Trustees).**

This guidance from the CC places an obligation on Trustees to take reasonable steps to protect all those who come into contact with Guide Dogs, including service users, volunteers and staff, from potential harm.

The Trustees must ensure Guide Dogs:

- Has appropriate policies and procedures in place.
- Compliance to these policies and procedures.
- Verifies that people are suitably qualified, have the appropriate skills and experience and adequately trained to undertake their roles.
- Able to spot and manage concerns in a full and open manner.
- Has a clear system of referring or reporting to relevant agencies 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.
- Is quick to respond to concerns raised and undertake appropriate investigations.
- Does not ignore harm or downplays failures.
- Guide Dogs has a balanced Trustee Board and does not let one Trustee dominate its work.
- Conducts periodic reviews of safeguarding policies, procedures, and practice.

## **Charity Commission Guidance - Safeguarding for Charities and Trustees.**

This guidance provides that charities have a responsibility to ensure they do not cause harm to anyone who has contact with them. Charities working with children or adults at risk have extra responsibilities. The Trustees must make sure that the charity fulfils this responsibility. Even if some activities are delegated to a safeguarding lead or group, the Trustees individually retain overall responsibility.

## **Children Act 1989 and 2004 (England and Wales); Children Act 1995 (Scotland); Children Northern Ireland Order 1995.**

The acts provide for specific duties owed by local authorities, collaborating with partner organisations and agencies, to safeguard and promote the welfare of all children in their area. The act has particular significance for Guide Dogs where it is providing services to children for and on behalf of local authorities as well as in the conduct of its own general services to children.

## **Safeguarding Vulnerable Groups Act 2006 (England and Wales); Scotland Adult Support and Protection Act 2007; Safeguarding Vulnerable Groups (Northern Ireland) Order 2007.**

The acts provide measures to avoid harm, or the risk of harm, by preventing people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.

## **Health and Safety at Work Act 1974.**

The act makes provision for securing the health, safety, and welfare of persons at work. It provides for measures to protect against risks to health or safety in connection with the activities of persons at work.

## **Appendix B - Safeguarding Documentation**

The following are policy, procedures and statement documents owned by the Safeguarding Team implemented in furtherance of the Safeguarding Key Principles, which employees and volunteers are required to comply with.

### **Policy**

- Digital Safeguarding Policy
- Safeguarding Prevent Policy
- Safeguarding Vulnerable Groups Policy

### **Procedure**

- Digital Safeguarding Procedure
- Safeguarding Adults Procedure
- Safeguarding Children and Young People's Procedure
- Safeguarding Referral Escalation Procedure

### **Statement**

- Safeguarding Adults Code of Conduct
- Safeguarding Children Code of Conduct
- Safeguarding Key Principles

### **Template/Form**

Digital Safeguarding risk assessment matrix template

## **Appendix C Safeguarding Team Terms of Reference**

The Safeguarding Team consists of professionals with relevant Safeguarding experience who have lead responsibility in Guide Dogs for advising on activity and acting upon safeguarding concerns involving children and young people, and adults to prevent harm. To help mitigate risk and act upon actual harm reported to the team. This is in line with Statutory Legislation, Local Authority and Charity Commission Requirements.

The Head of Safeguarding reports into The Head of Legal, part of the People and Performance Directorate.

The Head of Safeguarding takes responsibility for coordination of the cross organisational management of safeguarding.

The Safeguarding Team strive to:

1. Act upon Safeguarding concerns where someone is deemed at risk on the same working day providing it is reported to the team prior to 5 pm or within 24 hours on any given working day.
2. Respond to non-urgent safeguarding enquiries within 3 working days hours on any given working day.
3. Training enquiries will be responded to within 5 working days.
4. As part of the wider governance group, support and advise the organisation with developing services, policies, processes, procedures in line with best practice Safeguarding Standards.
5. Promote awareness of Safeguarding responsibilities within Guide Dogs.
6. Encourage stakeholders to report low level concerns whether in relation to staff, volunteers, services users or the public.
7. Provide mechanisms for reporting concerns at any level.
8. Design and deliver a suite of learning for staff and volunteers.
9. Deliver and facilitate specialist learning CPD opportunities for those with responsibility for safeguarding within the organisation.
10. Provide a framework for supervision for staff and volunteers who work with our service users and monitor compliance.

11. Monitor and report on compliance of safeguarding training across the organisation.
12. Report to the Executive Directors on a monthly basis of Safeguarding activities, referrals, Training compliance, Developments, risks and issues.
13. Report annually or as requested to Trustees and ARC on themes, trends, risk and activities.
14. Report externally on a case by case basis and work with Statutory agencies where required.
15. Review and maintain agreed policies, procedures and protocols that reflect a best practice approach to safeguarding on a minimum yearly basis and approved by Director of People and performance.
16. Share learning and casework developments to improve awareness and compliance.
17. Maintain and collaborate with professional networks to ensure best practice is shared and CPD opportunities are fully utilised.
18. Any other activity that the Safeguarding team determine necessary to support Safeguarding within Guide Dogs.

## **Appendix D - Charity Commission examples table: deciding what to report.**

### **Protecting people and safeguarding incidents**

#### **Serious incidents to report**

A beneficiary or other individual connected with the charity's activities has/alleges to have suffered serious harm.

Allegation that a staff member has physically or sexually assaulted or neglected a beneficiary whilst under the charity's care.

The Chief Executive of the charity has been suspended pending the outcome of an investigation into their alleged sexual harassment of a fellow member of staff.

Allegation that a trustee, staff member or volunteer has been sexually assaulted by another trustee, staff member or volunteer.

A staff computer is found to contain images of child pornography.

An internal investigation has established that there is a widespread culture of bullying within the charity.

A beneficiary or individual connected with the charity's activities has died or been seriously harmed; a significant contributory factor is the charity's failure to implement a relevant policy.

Charity failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from holding that position.

Charity discovers that an employee or volunteer coming into contact with children or at risk adults is on the sex offenders register.

#### **Incidents not to report**

Minor unusual/aggressive behaviour by a beneficiary towards a member of staff.

Charity becomes aware of allegations of abuse or neglect of a beneficiary that occurred outside the charity; the charity has reported the allegations to the appropriate agencies, and there is no harm to the charity's reputation.

A staff member who is not in a senior position or position of specific responsibility (e.g. head of safeguarding) has bullied or harassed a fellow staff member. There is no indication of a widespread culture of bullying or harassment within the charity and the incident is dealt with by minor disciplinary action (for example, the staff member responsible has not been suspended or dismissed).



## Governance Information. Please do not remove.

### Governance Review & Approval Table\*:

The table below contains two rows and five columns.

Governance Area:	H&S	Protection of Children & Adults	Insurance	Legal	GDPR
Date Approved:	N/A	Chris Roach 27/03/2024	N/A	Guy Perring 27/03/2024	N/A

### Review Frequency:

Best Practice Guidance: Annually

Reviews should be done in accordance with relevant regulation, legislation changes or as a result of ad hoc activity, such as continuous improvement initiatives.

### Version control table:

The table below contains 3 rows and 4 columns. (Only the original approval date and the most recent amendment should be included in the table.)

Date	Version	Status	Details of Change
27/03/24	1.0	Approved	Kathryn Ward - Director of People

**\*Please see below when a document must be reviewed by Governance**

**Safeguarding** - All documents with any reference to safeguarding, recruitment and training, working with clients (Adult and CYP).

**Legal** - All documents with any reference to agreements or contracts, third party partnerships, potential reputational risk, reference to compliance with any statutory or regulatory obligation.

**Health and Safety** - All documents where an activity could cause harm to a member of staff, service user, volunteer or third party or where there is reputational risk.

**Insurance** - A change to the way we deliver our services.

**GDPR** - If we are gathering any personal information on volunteers or service users.

### End of document