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Introduction

USPUK is a charity providing advice, guidance, and support for Ukrainian refugees navigating the UK's Homes for Ukraine visa application process. Many of its beneficiaries are women and children who are living in temporary accommodation in Poland. USPUK provides its support:

- **by digital means:** through its website and social media and through online conversations with refugees on Telegram, Facebook, Instagram and by email
- **in person:** at helpdesks established at refugee centres in Warsaw and Krakow
- **through partnerships with other organisations:** such as The Communities for Ukraine programme running in partnership with Citizens UK.

USPUK relies on a network of consultants and volunteers in the UK, Poland and Ukraine to provide support to its beneficiaries. Many of these consultants and volunteers are themselves Ukrainian refugees. USPUK equips these consultants and volunteers with the information and guidance they need in order to support USPUK's beneficiaries.

USPUK is committed to proactively safeguarding and promoting the welfare of its beneficiaries, volunteers, staff, and trustees, and to taking reasonable steps to ensure those who encounter USPUK do not, as a result, come to any harm.

This policy relates to USPUK's commitments to safeguarding (as defined by The Charity Commission) and protecting children and adults at risk.

The Charity Commission publishes guidance, "Safeguarding and protecting people for charities and trustees", which is updated from time to time and available at: <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#safeguarding-children-or-adults-at-risk>.

Safeguarding in the context of USPUK's activities

USPUK was established to respond swiftly to the rapidly evolving needs of Ukrainian refugees in an unstable and fast-paced geo-political context. In this challenging context, USPUK is committed to work quickly, flexibly, and creatively to provide support to Ukrainian refugees to help them rebuild their lives in the UK.



USPUK recognises that many of its beneficiaries and its consultants and volunteers in Poland will be adults at risk given their status as refugees. USPUK strives to protect the rights and uphold the dignity of all the people with which it works.

What is safeguarding?

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and adults at risk wherever possible and dealing sensitively and appropriately with the situation should any incident arise which places a child or adult at risk or in which a child or adult has suffered abuse.

Vulnerable persons can be harmed, or put at risk of harm, by organisations and institutions, and abuse of vulnerable groups can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.

Unintentional acts may lead to harm due to a lack of 'due diligence' or competence or through organisational negligence, such as inadequate care and supervision, lack of policies, procedures, and guidance to inform programming and practice, or lack of staff compliance with legal requirements. Also, deliberate actions may be taken by people with intent to abuse vulnerable people.

What is abuse?

Abuse can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender, or culture. Abuse can take a variety of forms, for example:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Psychological abuse
- Neglect
- Radicalisation
- Financial abuse



A non-exhaustive list of potential indicators of abuse is set out in the **Safeguarding Crib Sheet** in Appendix 1 of this Policy.

Key definitions

A child is defined as anyone who is under 18 years of age.

An adult at risk is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support who is experiencing, or is at risk of, abuse or neglect and who, 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. Whether an adult is at risk or not is something which can change with their circumstances and is not fixed. An adult at risk may have a mental illness, a learning disability, a physical disability, be frail or be otherwise in need of additional assistance to protect themselves from harm or exploitation, for example, due to social factors such as poverty, displacement or lack of services or support.

Scope of this policy

For USPUK's Staff

For the purposes of this policy **"Staff"** is defined as anyone who works for, or is engaged by USPUK, either in a paid or unpaid, full time or part time capacity. This includes directly employed staff, contractors, agency staff, consultants, visitors, researchers, volunteers, interns, and equivalents. Compliance with this policy is mandatory for all USPUK's Staff.

For Trustees

As the Trustees must always act in the best interests of USPUK and its ultimate beneficiaries, they are also required to comply with this policy.

For Partners

"Partner" means any organisation which receives funding from USPUK, which collaborates with USPUK to deliver any of its programmes or activities, or which is otherwise associated with USPUK's name and brand. It includes organisations based in the UK providing support to Ukrainian refugees with which USPUK collaborates (such as sponsor-matching services, or those providing accommodation and welfare assistance on arrival in the UK).



This policy is intended to work alongside the equivalent policies of USPUK's Partners, where appropriate. USPUK expects that the principles and approaches already shared with Partners mean that they will fully support the values and commitments set out in this policy and compliance with this will be a condition of a written agreement between USPUK and the Partner.

USPUK will ensure that any Partners providing support to Ukrainian refugees in the UK or elsewhere, have in place appropriate safeguarding policies and procedures (which share the values and commitments in this policy) before signposting any of its beneficiaries to such Partners' services.

USPUK will ensure that each Partner has appointed a member of staff who will be responsible for promptly reporting to USPUK's Safeguarding Leads (or, if they are unavailable, another appropriate person) any safeguarding concerns that arise in, or relevant to the context of, the partnership.

Consequences of breaches of this policy

Breaches of this policy by Staff will be treated seriously and will be treated as a potential cause for disciplinary action (in the case of USPUK Staff) or termination of the relationship by other means. Breaches by Trustees may result in the termination of their trusteeship. Breaches by Partners may result in the termination of the relationship in accordance with the relevant partnership agreement.

Roles and Responsibilities

The Trustees of USPUK have ultimate responsibility for ensuring that USPUK protects from harm all those who come into contact with it. The Trustees have oversight of USPUK's safeguarding and linked policies and oversee USPUK's handling of safeguarding reports.

The Trustees also have responsibility for deciding whether any serious incident reports need to be made to USPUK Commission in relation to safeguarding incidents.

The Trustees may appoint one of their number to act as **Safeguarding Trustee**. The role of the Safeguarding Trustee will be to act as the first point of contact on the Board for the UK



Safeguarding Lead and the Poland Safeguarding Lead, but the appointment of a Safeguarding Trustee will not detract from the fact that all the Trustees share collective responsibility for safeguarding within USPUK.

USPUK will have a **UK Safeguarding Lead** and a **Poland Safeguarding Lead** (together the “**Safeguarding Leads**”).

The **Poland Safeguarding Lead** will:

- act as the first point of contact for all safeguarding concerns and enquiries from Staff operating in Poland and liaise with the UK Safeguarding Lead to decide how to respond to the concern
- work with the UK Safeguarding Lead and the Safeguarding Trustee to make any necessary reports to statutory agencies and will keep records of any action taken in response to safeguarding concerns
- ensure that Staff operating in Poland have appropriate safeguarding training including ensuring that all Staff have read and understood the **Safeguarding Crib Sheet** in Appendix 1 and the **Code of Conduct** in Appendix 2
- monitor the compliance of USPUK’s Staff in Poland with this Policy and the Code of Conduct and update the UK Safeguarding Lead and the Safeguarding Trustee if they have any concerns in relation to safeguarding culture within USPUK’s operations in Poland
- monitor the safety and wellbeing of USPUK’s Staff in Poland, ensuring that they are properly supported to fulfil their role within USPUK

The **UK Safeguarding Lead** will:

- act as the first point of contact for all safeguarding concerns and enquiries from the Poland Safeguarding Lead or from Staff operating in the UK and liaise with the Poland Safeguarding Lead and the Safeguarding Trustee to decide how to respond to the concern
- respond to all safeguarding concerns and enquiries
- working with the Safeguarding Trustee, make any necessary reports to statutory agencies and keep records of any action taken in response to safeguarding concerns
- ensure that all Trustees, Staff and volunteers have appropriate safeguarding training including ensuring that all Staff have read and understood the **Safeguarding Crib Sheet** in Appendix 1 and the **Code of Conduct** in Appendix 2



- ensure USPUK's Safeguarding Policy reflects changes to legislation and is kept up to date in relation to best practice when the policy is reviewed
- ensure that Trustees, Staff and volunteers have appropriate training in the application of the policy on an annual basis and review the position annually
- monitor the overall trend of any safeguarding concerns and report annually (or more frequently, as appropriate) to the Trustees. While all the Trustees have a collective responsibility for safeguarding, the Safeguarding Trustee will usually be the first point of contact on the board for the Safeguarding Leads

All **Staff** working directly with beneficiaries (including children and adults at risk) within or connected with USPUK's activities/events should be familiar with this policy. The Safeguarding Crib Sheet at Appendix 1 will be shared with USPUK's Staff in Poland (including in translation to Ukrainian).

In addition, all Staff should conduct themselves in accordance with USPUK's Code of Conduct in Appendix 2. This provides guidance on acceptable and desirable conduct to protect beneficiaries (and particularly children and adults at risk) who may encounter USPUK.

Every individual who becomes aware of any suspicions or allegations regarding harm to children or adults at risk is required to report this immediately to the Poland Safeguarding Lead, the UK Safeguarding Lead or the Safeguarding Trustee.

Statement of Commitments

USPUK commits to taking all reasonable measures to ensure all individuals (including children and adults at risk) impacted by projects and programmes delivered and/or supported by USPUK are protected as far as possible from harm, including exploitation, neglect, and abuse of all kinds.

USPUK commits to:

- Developing a 'culture of safety' within USPUK that creates and maintains protective environments
- Placing safeguarding at the heart of recruitment practices by complying with Safer Recruitment practices (described below)



- Increasing understanding and raising the awareness of Staff and Trustees of risks relating to safeguarding within the organisation and in connection with its activities
- Integrating safeguarding and onward reporting requirements in USPUK's partnership agreements, taking account ensuring all Staff are aware of the need to comply with the Code of Conduct and receive the guidance in the Safeguarding Crib Sheet
- Taking appropriate and proportionate action if this policy is not complied with
- Maintaining adequate insurance in relation to USPUK's activities and the people involved, to the extent that it is reasonably available
- Carrying out appropriate due diligence on any Partners, which may include ensuring they have appropriate controls and safeguarding measures in place, meet any applicable international standards in carrying out their activities of The Charity Commission's relevant guidance, "Charities: due diligence, monitoring and verifying the end use of charitable funds" which is updated from time to time and available at: <https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds>
- Ensuring all Staff and Trustees are aware of their responsibilities to report concerns and of steps to take/who to go to report such concerns and ensuring that reported safeguarding concerns are addressed promptly and through the appropriate channels.
- Reporting safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, and in accordance with best practice. USPUK will fully risk assess such reporting to ensure that making a report is not likely to cause further harm to the individual(s) to whom harm has (actually, allegedly or potentially) already been caused
- Ensuring that its Privacy Policy remains suitably updated so that it is clear how information will be shared as may be necessary to protect individuals from harm
- Will provide fair and accurate references, which appropriately reflect USPUK's experience and interaction with Trustees, Staff and Partners

Safer Recruitment

USPUK has been established quickly to meet an urgent need in a fast-paced and challenging environment. USPUK has therefore adopted the Safer Recruitment processes set out below in order to balance the need to protect beneficiaries from harm from Staff whilst ensuring that the



processes do not present a disproportionate barrier to USPUK responding promptly to urgent needs of its beneficiaries.

There are different processes for Staff based in the UK and Staff based in Poland to reflect that USPUK's Staff in Poland have often themselves recently fled the war in Ukraine and so may not have access to official documents or employment references.

Staff based in the UK

Higher-Level DBS Checks

USPUK does not expect any of its Staff based in the UK to be engaged in roles which would be eligible for Higher-Level DBS Checks. This will be kept under review, particularly if USPUK expands its activities. Where a UK-based role is eligible for a Higher-Level DBS Check, USPUK shall carry out the highest level of those checks for which the role is eligible.

Basic DBS Checks

USPUK will carry out a risk assessment to decide whether any Staff based in the UK should be required to undergo a basic DBS check. Relevant risk factors include:

- whether the post-holder may have any contact with children or adults at risk (including online);
- the nature, length, and frequency of the contact; and
- whether the contact would be supervised or unsupervised.

USPUK will also consider the risk factors set out above to determine whether it would be appropriate to:

- conduct an interview which includes asking the candidate about their understanding of the safeguarding requirements of the role
- require at least one written reference
- check qualifications and certifications and consider gaps in work history

Staff based in Poland

USPUK recognises that its Staff based in Poland are themselves recent refugees from Ukraine and therefore may not be able to provide identity documents or employment references. It will



therefore not be possible to carry out DBS checks (or equivalent overseas criminal record checks) for Staff based in Poland. USPUK has implemented alternative safeguards to protect its beneficiaries as set out in this Policy.

The Poland Safeguarding Lead will speak with all prospective Staff members in Poland before they commence work for USPUK. The purpose of this conversation will be to ensure that the prospective Staff member understands the safeguarding requirements of the role and is committed to complying with the Code of Conduct and the key requirements set out in the Safeguarding Crib Sheet. If the Poland Safeguarding Lead has any concerns about an individual's suitability for the role, they will not be engaged by USPUK.

Embedding Organisational Commitment

To make its policy commitments a practical reality, USPUK will instigate a range of measures that focus on making sure this policy and associated procedures are in place, that Staff are supported to understand and work within the provisions of the policy, that it is fully and effectively integrated into all USPUK's activities, and that it is subject to monitoring and review.

USPUK's Staff and Trustees will receive training/briefing on their responsibilities and obligations under this policy and it will form part of the induction for new Staff and Trustees.

Formal safeguarding training is unlikely to be feasible for Staff in Poland. Instead, the Poland Safeguarding Lead will ensure they are familiar with the requirements set out in the Safeguarding Crib Sheet and Code of Conduct.

The Trustees will ensure that they have in place processes to properly monitor USPUK's activities in Poland. This will include ensuring regular communication with the Poland Safeguarding Lead and other Staff based in Poland and considering monitoring visits as and when possible and appropriate.

Staff and Trustees will be expected to acknowledge and accept their responsibilities under this policy. Breaches of this policy by Staff will be treated seriously and will be treated as a potential cause for disciplinary action or termination of the relationship by other means. Breaches by Trustees may result in the termination of their trusteeship.



Reporting and responding to concerns

Where any safeguarding concern arises, whether because of an occurrence during an activity or arising from a complaint or otherwise, the concern will be treated seriously and dealt with in accordance with this policy.

Staff based in Poland should report any safeguarding concerns to the Poland Safeguarding Lead in the first instance, though they can contact the UK Safeguarding Lead directly if they prefer.

The Poland Safeguarding Lead will notify the UK Safeguarding Lead of any safeguarding concerns. Together they will decide whether further investigation is needed or what other action to take.

When dealing with a safeguarding concern, accusation, or whistleblowing, whether it is from a child or adult, Staff should follow the guidelines set out in the Safeguarding Crib Sheet.

It is not the responsibility of anyone in USPUK to decide whether a child or vulnerable adult has been abused. It is however everyone's responsibility to report concerns and comply with this policy.

Next steps to be taken by the Safeguarding Leads

On notification of a safeguarding concern, the Safeguarding Leads shall consider the circumstances and decide whether further information gathering is required or what other action to take. The UK Safeguarding Lead will ensure that all concerns are properly recorded, and records kept securely and confidentially and will liaise with statutory safeguarding bodies as required.

USPUK works with refugees who recently arrived in Poland having fled the war in Ukraine. It is therefore possible that these people might exhibit some of the signs of abuse set out in Safeguarding Crib Sheet in Appendix 1 because of the extreme difficulties and hardships faced in their escape from Ukraine and as a result of their displacement in Poland. This Safeguarding



Leads will have regard to this context when deciding if it would be appropriate or helpful to make a report to external authorities.

Decisions to report to external authorities (including reports to local law enforcement agencies outside of the UK) will be fully risk assessed and anonymisation/pseudonymisation considered when necessary.

The Safeguarding Leads shall take steps to ensure that the individual who made the disclosure has access to appropriate ongoing support.

Responding to a disclosure relating to abuse allegedly perpetrated by USPUK's Staff

Any suspicion of or disclosure about abuse allegedly perpetrated by a member of Staff must be reported to the relevant Safeguarding Lead on the same working day where possible and not later than the next working day. In the absence of the Safeguarding Leads, or if the report is about the Safeguarding Leads, the report shall be made to the Safeguarding Trustee.

In responding to a disclosure about abuse allegedly perpetrated by member of Staff, USPUK will take robust steps to respond to the disclosure. USPUK will report the disclosure to the police or other statutory authority, as appropriate. Where this is the case, a written record of the date and time of the report shall be made. The individual who is the subject of the disclosure will also be subject to internal disciplinary action.

Reporting serious incidents to The Charity Commission and other external bodies

USPUK is committed to reporting all relevant incidents to The Charity Commission for England and Wales via a serious incident report in accordance with its Reporting of Serious Incidents Policy. The Charity Commission has published guidance as to what constitutes a serious incident and how to make a report, which is updated from time to time and available at <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>.

The Charity Commission has published guidance on the criminal reporting of safeguarding offences (including overseas), which is updated from time to time and available at



https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780835/Criminal_reporting_of_safeguarding_offences_including_overseas_v3.pdf.

USPUK will also report incidents to other regulatory bodies and government departments or funding bodies, where appropriate. Where there is evidence that criminal activity may have taken place, or concerns have been raised in relation to a child or vulnerable adult, USPUK will report to the relevant police and/or safeguarding authorities as appropriate, taking appropriate account of The Charity Commission's guidance in this respect.

Reporting will not be avoided on the basis that it may harm USPUK's reputation or give rise to litigation and any concerns in relation to data protection will not act as a barrier to reporting, although they will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.

Publishing this policy

USPUK will ensure that this policy is always publicly accessible on its website.



Appendix 1

Safeguarding Crib Sheet

USPUK's Safeguarding commitment

USPUK is committed to proactively safeguarding and promoting the welfare of its beneficiaries, volunteers, staff, consultants and trustees, and to taking reasonable steps to ensure those who encounter USPUK do not, as a result, come to any harm.

Your Safeguarding responsibilities

USPUK requires all volunteers, staff, consultants and trustees to:

- Read and understand this Safeguarding Crib Sheet
- Comply with the USPUK Code of Conduct
- Report any safeguarding concerns to the Poland Safeguarding Lead or the UK Safeguarding Lead or the Safeguarding Trustee
- Signs of abuse
- Abuse can take a variety of forms, for example,
- Physical abuse
- Sexual abuse
- Emotional abuse
- Psychological abuse
- Neglect
- Radicalisation
- Financial abuse

The following is a list of signs of abuse of children and adults. It is not an exhaustive list.

Physical Abuse	Bruises, cuts, burns, bite marks, broken bones Unexplained injuries Frequent injuries
Emotional Abuse	Struggling to control emotions Low self esteem Acting in a way inappropriate for age Isolation
Sexual Abuse	Avoiding being alone with or frightened of someone they know Language or sexual behaviour you would not expect them to know Change in mood or behaviour Self-harm Bruises Bleeding, pain, soreness in genital or anal area, or difficulty sitting
Neglect	Poor appearance or hygiene Regular illness Tiredness Weight or growth issues



Responding to Safeguarding disclosures

- If a child or adult discloses a safeguarding concern to you, you should:
- Stay calm and listen carefully to what is said
- Reassure the person that to tell is the right thing to do
- Do not promise to keep secrets
- Ask questions only to seek clarification and make sure they are not leading questions
- Explain what will happen next, and who will be told
- As soon as possible record in writing what was said using the person's own words whenever possible
- Report to the Poland Safeguarding Lead or the UK Safeguarding Lead as soon as possible

Reporting Safeguarding concerns

You should report any concerns to the Poland Safeguarding Lead as soon as possible.

Alternatively, you can contact the UK Safeguarding Lead or the Safeguarding Trustee directly.

Safeguarding contacts

Poland Safeguarding Lead	
Name:	Anastasiia Spivak
Email:	anastasiia@uspuk.org
UK Safeguarding Lead	
Name:	George Crawley
Email:	george@uspuk.org
Safeguarding Trustee	
Name:	Heather Savory
Email:	heather@heathersavory.com



Appendix 2

USPUK Code of Conduct

USPUK staff, consultants and volunteers shall:

- treat everyone with dignity and respect regardless of differences of ethnicity, religion, age, ability, gender, sexual orientation, class, and economic circumstances;
- not use language or behaviour towards anyone they encounter through their work at USPUK that is verbally or physically intimidating, threatening, humiliating, degrading, shaming, blaming, sexually provocative or coercing;
- not give personal gifts or cash to beneficiaries;
- not initiate or respond to sexual contact with children or adults at risk or enter an emotionally intimate relationship with a child or adult at risk and shall avoid all unnecessary physical contact with children or adults at risk;
- avoid showing favouritism towards particular USPUK beneficiaries;
- not develop relationships with children and/or adults at risk outside of the scope of USPUK's work and shall not contact children or adults at risk other than in a USPUK work context;
- avoid being alone with a child or adults at risk in a private place that cannot be readily seen by other responsible adults;
- not use electronics (laptop, phone, etc.) issued by USPUK or any USPUK resources whatsoever to access any pornography from the internet, forward pornographic emails, or gain opportunities for sexual encounters;
- not offer cigarettes or alcohol to children or adults at risk;
- not use their personal electronic devices such as mobile phones or tablets to take any personal photographs or videos of children or adults at risk, not individually post information about children or adults at risk on social media and shall not post anything to social media which would bring USPUK into disrepute;
- not invite children or adults at risk who they have met through USPUK's activities into their home or current lodgings;
- always responsible for the interaction between an adult and a child even when it appears that a child is acting in a provocative manner. It is the responsibility of the adult to set appropriate boundaries that protect the best interest of the child;
- ensure that all events and activities involving any children/ adults at risk are in the best interests of the children involved; and,
- immediately report any safeguarding concerns to a Safeguarding Lead.