



## Safeguarding Framework

### Battersea Grants and Programmes

#### Introduction

At Battersea we are committed to safeguarding the well-being of all those we encounter through our work, particularly children and vulnerable adults who by definition are at increased risk of potential harm and may not be able to protect themselves. This framework integrates Charity Commission guidance<sup>1</sup> and best practice in grant making<sup>2</sup>.

For Battersea, our safeguarding approach within grant making, recognizes that local norms and laws around safeguarding differ and best practice varies both in the UK and internationally. Whether we are working with a grantee in the UK or internationally, our approach is to seek opportunities to improve practice and to assess interest and willingness to make improvements over time.

#### How should Battersea support a grantee's safeguarding practice?

In line with our Grants and Academy strategy, we are committed to supporting rescues and other animal welfare organisations to develop and improve their practice in all areas of their work. Our approach will not involve over-stepping our role by initiating actions which undermine our grantees and potentially expose vulnerable people and witnesses to additional risk. Our approach to safeguarding will follow a developmental and relational approach, enabling us to build trust, improve practice, protect people and ultimately have greater impact for dogs and cats.

#### Assessing Applicants

- Applicants must indicate if they practice safeguarding within the application process. Our grant proposal template includes a short section with basic questions to help us with forming an initial judgement of the applicants understanding of safeguarding risks and the practical steps the organization takes to prevent harm and ensure an effective response to abuse. We also request a copy of the organization's safeguarding and/or child protection policy, and other relevant policies aimed at protecting individuals connected with the organization.
- Grants Managers then lead a specific conversation with each potential grantee to understand in more depth their approach to safeguarding and to encourage open and honest conversations about challenges they are facing (see appendix 1 for guidance).
- As part of the Organisational Assessment process, the Grants Manager will capture their assessment of the grantee's safeguarding practice to understand potential areas of risk.
- We recognise that different organizations will be at different stages in their safeguarding journey, and many may not have well-developed policies and procedures in place. The potential grantee does not need to meet all the criteria of the assessment but must have a least a basic safeguarding policy to have their proposal considered. In addition, through

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<sup>1</sup> [Safeguarding and protecting people for charities and trustees - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>2</sup> See Funder Safeguarding Collaborative founded by Oak Foundation, Comic Relief, Porticus, The National Lottery Community Fund, and Global Fund for Children [Funder Safeguarding Collaborative | Global Fund for Children](#)

conversation, they must also demonstrate interest and willingness to make improvements in their practice throughout the lifecycle of the grant.

### **Grant Approval**

- All grants are presented for approval to the relevant approver depending on the grant size and risk profile of the grant. These decision-making bodies are informed of the applicant's safeguarding practice and may decide to place conditions on the grant.
- Should the grant be 'approved', pending a conversation with the potential grantee regarding these conditions, the Grants Manager will explore and agree ways in which Battersea can support the grantee to improve their practice (e.g. access to capacity building opportunities, organisational exchange opportunities, online group discussions, sharing of resources, connecting them with an organisation facing a similar challenge, adjusting the grant amount to include funds for improving safeguarding, etc.).
- The Grants Manager will clearly communicate our commitment to safeguarding in writing, what information we require for reporting a safeguarding incident, by when we expect to be informed of an incident (within 72 hours) the procedures we have in place and how their sensitive data will be managed.
- Battersea's grant agreement will include a reference to safeguarding, including our expectation that a policy is in place and is practiced, and our expectations for reporting concerns to Battersea and who to contact.

### **Safeguarding upon approval of grant**

- Relying on a legal document (such as the grant agreement) to outline our expectations is not sufficient. Legal documents are not always read and understood, and they don't contribute to us building ownership of safeguarding within grantee organisations, nor do they contribute to a shared understanding and commitment to safeguarding with our grantees in the countries we operate.
- Grant Managers will engage with grantees throughout the lifecycle of the grant, and will integrate safeguarding into monitoring reports, calls and visits as a specific agenda item, to acknowledge progress, provide support for challenges and to elevate safeguarding as a critical part of our shared work with our grantees. A Grants Manager will speak with different members of an organisation's staff team, at different points in time, to build a more comprehensive perspective of safeguarding practice. The level of monitoring and support provided will be proportional to the need, not the size of the grant itself.
- The Grants Managers will seek opportunities to bring grantees together to share their expertise, experience, best practice, and challenges, valuing their locally led solutions and leadership, encouraging curiosity, rather than compliance.
- Should Battersea be supporting a large and/or multi-year project/programme, or multiple grantees within a single country overseas, the Head of Grants and Programmes may decide to commission an external safeguarding assessment by an expert with knowledge of the local context. This assessment would be used to help both Battersea and our grantee partner(s) to understand their current safeguarding practice and to recommend steps they could take to improve their practice. This would be mutually agreed with our grantee(s).

### **Expectations for reporting a safeguarding concern to Battersea**

We recognize that safeguarding concerns can arise in any organization. As a condition of funding, we require grantees to notify us within 72 hours of:

- Any allegation of harm or abuse (physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, sexual abuse or harassment) perpetrated

by their staff, volunteers, contractors, board members or others representing their organization.

- Any incidents of significant harm caused by weaknesses or gaps in organizational procedures and/or program design.

We ask that grantees contact us within 72 hours of a concern being raised, as we may be able to support them in your response. It's acceptable if they cannot contact us within this period if you can explain why this wasn't possible.

Given the nature of the work we fund, we recognise that our grantee partners may encounter harm and abuse within the communities they work. For example, an organisation may make home visits to check the suitability of the environment for an animal. We also recognise that grantees may choose to speak to us about other issues within their organization and we aim to provide a safe space for our grantees to discuss any concerns. However, only allegations of harm caused by their staff or operations will be categorised as a 'safeguarding concern' and dealt with in line with the procedure described below.

- The grantee should contact their Battersea Grants Manager and discuss the concern over the phone to reduce the burden to provide written information at this point. Although we ask to be notified within 72 hours of an incident, the priority will always be to ensure the safety of those involved and reporting to Battersea should never take priority over taking action to safeguard those at risk.
- The Grants Manager would immediately report the concern to the Head of Grants and programmes, who will decide if it needs to be discussed and escalated to Battersea's Safeguarding lead (Director of Human Resources, or Head of Human Resources in their absence) and logged securely as part of Battersea's safeguarding governance. Together they will assess the risk to those involved, to those we work with and the risk to Battersea and agree Battersea's response and support we can provide to address the concern. All involved will exercise confidentiality.
- Within one week, the grantee must send a written summary of the concern in order that accurate records can be maintained. Grantees should not include any identifying details (names, addresses etc) to protect the confidentiality of those involved.

This summary should include:

- A brief outline of the concern (e.g. allegation of abuse or misconduct, breach of procedures etc), when and where the incident took place.
  - The category of employment of the individual who has been accused of abuse or misconduct (e.g. senior manager, operations director, volunteer, contractor etc.)
  - The grantee organisation's relationship with the individual who has suffered harm or abuse (e.g. program participant, staff member, community member). Where the victim is a child, this must be clearly stated.
  - What action has been taken so far, including whether the incident has been reported to the police or local authorities.
  - Details of planned future actions with estimated timelines.
- The Head of Grants and Programmes will enter all safeguarding concerns raised by our grantees into a secure Microsoft Forms based process to be logged centrally. This information is only accessible to Battersea's safeguarding leads.
  - In line with our commitment to community-driven approaches and listening to solutions devised by local people, Battersea will not seek to impose a particular response on our grantees. Instead, we will:

- Encourage the grantee to address the concern in accordance with their own safeguarding policy and national law.
- Work collaboratively with the grantee to ensure the most appropriate action is taken and offer support wherever possible. Battersea will offer support to the grantee around handling the safeguarding concern, in the interests of further developing the organisation's capability and ensuring safeguarding best practice. This may include making a grant (for example towards the costs of investigating and ensuring access to support services for the persons involved), if deemed an appropriate intervention in the context of the overall partnership and in the interests of developing the grantee organisation's capacity.
- We recognise that some issues will take time to resolve and while we don't expect an immediate solution, we do expect grantees to keep us informed of progress.
- Although we do not seek to impose solutions, we do expect our grantees to demonstrate that:
  - They have taken all necessary steps to ensure the safety and welfare of those involved.
  - They are taking a survivor-centred approach that recognises the agency of survivors, including children, and takes their preferences, wishes and beliefs into account.
  - They are investigating all allegations of abuse and initiate disciplinary action where appropriate.
  - They have followed national laws, including referral to the relevant authorities. We recognise that in some instances, reporting to the authorities may not be possible due to the additional risk of harm this creates. In these circumstances, Battersea will request further details about the assessed risks and the implications of not reporting for the survivor and for the organization.
  - The organization's leadership are aware of the concern and are taking proactive steps to ensure a resolution and prevent similar concerns from arising in the future.
- If we find that a grantee is unable or unwilling to address the concern, or continued involvement with the grantee would place Battersea staff and/or others at risk, we reserve the right to suspend or terminate funding. The Head of Grants and Programmes is responsible for any decisions regarding changes to the funding relationship as a result of the concern and will be responsible for communicating this to the grantee.
- We recognise that dealing with safeguarding concerns can be emotionally challenging. The Grants Manager will be provided with support as required and protection from reprisals.

## Appendix 1: Assessing Safeguarding Policies and Practices

<b>Assessment Criteria</b>	<b>Appropriate policies and practices are in place to keep people safe.</b>
<b>Why we include this</b>	Policies and procedures provide guidance to staff and volunteers on how to keep people safe and help ensure consistency across the organisation.
<b>How we assess this</b>	<p>All applicants are asked to submit a copy of their safeguarding policies and procedures.</p> <p>If the submitted policy does not meet our assessment criteria, the Grants Manager will discuss this with the applicant and ask them to explain their approach to keeping people safe, recognising that safe practices may exist even where these are not documented in formal policies and procedures.</p>
<b>What we want to see</b>	<ul style="list-style-type: none"> <li>• The applicant has a safeguarding policy, which includes a definition of safeguarding and outlines of the organisation's commitment to safeguarding.</li> <li>• It includes definitions that define what a child is, what a vulnerable adult is, what is covered by the policy: who it applies to, what actions are covered by the policy, and importantly what constitutes harm (as defined by the legislation)?</li> <li>• The policy includes the various national legislations that are basis of their policy.</li> <li>• The policy includes clear guidelines on expected behaviours when interacting with children or adults at risk.</li> <li>• The policy may reference other related documents, such as A Code of Conduct. The Code sets out behaviour that is acceptable and unacceptable to the organisation.</li> <li>• The policy includes information on mitigation, including how the organisation sets out to create a culture that prevents safeguarding incidents.</li> <li>• The policy includes a section on how the policy will be implemented. For example: <ul style="list-style-type: none"> <li>○ In recruitment process and whether there are steps they will take such as disclosure, references etc. to ensure employees are of good character.</li> <li>○ In the induction and on-going training of staff, volunteers and trustees on safeguarding awareness. For example, most policies cover this by stating they will require staff and volunteers to read and sign the policy, plus have regular awareness days.</li> <li>○ In any governance structures that they have implemented to ensure safeguarding is a top priority. For example, having a designated Board member as a focal point for safeguarding, having safeguarding as a standing item on their board agenda, appointment of a safeguarding officer, safeguarding committee, etc.</li> </ul> </li> </ul>
<b>Meeting Requirements</b>	<p>All applicants are expected to have at least a basic safeguarding policy in place if they are to be recommended for funding. The policy does not need to meet all the criteria above to be considered for a grant. However, the Grants Manager will provide the applicant with feedback on the policy with suggestions for improvement and these are expected to be made as a condition of the grant. We also expect to see evidence that the organisation is making efforts to implement the policy. Organisations who do not have a basic safeguarding policy and can't demonstrate how they implement the policy will not be eligible for funding from Battersea.</p>

<b>Assessment Criteria</b>	<b>There are accessible channels for raising safeguarding concerns and a clear system for responding, including reporting concerns to relevant authorities.</b>
<b>Why we include this</b>	Harm and abuse can occur in any organisation. It is important that everyone knows who to talk to if they are worried about someone's safety and that there are clear steps which will be followed to ensure that action is taken to keep everyone safe.
<b>How we assess this</b>	Safeguarding policies are reviewed to ensure they include procedures for the reporting and response to safeguarding concerns.  In addition, the Grants Manager will discuss how the organisation manages safeguarding concerns as part of the application process. The applicant will be asked to describe how staff and those they interact with can raise safeguarding concerns and what action the organisation would take in response.
<b>What we want to see</b>	<ul style="list-style-type: none"> <li>• The applicant takes proactive steps to ensure that staff, volunteers and those they interact with, know how to report concerns and who to, including providing the name and contact details of who to report to.</li> <li>• The applicant can clearly explain how they would respond to concerns (including steps to take to manage allegations made against a member of staff or volunteer), and how they would report them to relevant authorities (includes contact details).</li> <li>• The applicant has a documented reporting and response procedure within their safeguarding policy.</li> </ul>
<b>Meeting Requirements</b>	All applicants are expected to have a clear procedure for reporting and responding to safeguarding concerns. If an applicant is unable to explain how they would manage a safeguarding concern, they will not be recommended for funding.  If the procedure is not clearly documented, the organisation may be recommended for funding but will be required to strengthen or update their reporting and response procedures within their policy, as a condition of funding or condition of future funding.  Where organisations do not have clearly defined training for staff and volunteers, they will be required to implement these as a condition of funding.

<b>Assessment Criteria</b>	<b>Steps are taken to ensure people are suitable to act in their roles and everyone is aware of their safeguarding responsibilities</b>
<b>Why we include this</b>	Organisations are only as safe as the people who work within them. Vetting reduces the risk of recruiting staff and volunteers who pose a risk to others while training and support ensures people can fulfil their safeguarding responsibilities.
<b>How we assess this</b>	Safeguarding policies are reviewed to understand the organisation's approach to recruitment, training, and support.  We recognise that some organisations may not include details about recruitment and training in their safeguarding policies. Where this information cannot be obtained by reviewing the policy, the Grants Manager will discuss this with the applicant as part of the assessment process.
<b>What we want to see</b>	<ul style="list-style-type: none"> <li>• All staff and volunteers are made aware of the organisation's safeguarding policies and procedures and understand their responsibility to keep people safe as part of their induction.</li> <li>• Staff and volunteers who are interacting with children or adults at risk are provided with regular training on safeguarding relevant to their role.</li> </ul> <p>Where the organisation is applying for funding to cover roles working directly with children or adults at risk, the organisation must:</p> <ul style="list-style-type: none"> <li>• Interview each person to assess their suitability</li> </ul>

	<ul style="list-style-type: none"> <li>• Complete reference checks to ensure suitability for the post (requesting a minimum of two references)</li> <li>• Conduct additional background or criminal records checks for any staff who are in regular, unsupervised contact with children and/or adults at risk.</li> </ul>
<b>Meeting Requirements</b>	<p>All applicants must have clear processes in place to make staff aware of their safeguarding responsibilities. Organisations will be encouraged to document this within their safeguarding policy.</p> <p>Organisations applying for funding to cover roles working directly with children or adults at risk, must have appropriate vetting procedures in place and these must be documented in their safeguarding policy and/or HR policies.</p>

<b>Assessment Criteria</b>	<b>There is clear accountability and oversight to ensure everyone connected with the charity is protected from harm.</b>
<b>Why we include this</b>	To be effective, safeguarding cannot be the responsibility of individual staff but must be promoted and supported by those in leadership positions including trustees.
<b>How we assess this</b>	The Grants Manager will ask the applicant to explain who has responsibility for safeguarding and how these individuals ensure the implementation of safeguarding, including the management of safeguarding concerns.
<b>What we want to see</b>	<ul style="list-style-type: none"> <li>• Safeguarding is monitored and supported by Trustees and senior management.</li> <li>• Trustees and senior management are provided with training on their responsibilities in relation to safeguarding.</li> <li>• The organisation has an appropriately trained designated safeguarding lead to advise and support staff.</li> <li>• It is good practice to have a nominated trustee on the Board for safeguarding</li> </ul>
<b>Meeting Requirements</b>	All applicants must have a designated safeguarding lead. Where organisations do not have clearly defined responsibilities or training for trustees, they will be recommended to implement these as a condition of funding.