

SAFEGUARDING POLICY

Policy in a sentence

To set out the framework for the responsibilities the Trust and grant funded organisations have towards promoting the welfare and safeguarding of vulnerable adults and children.

Context

The Armed Forces Covenant Fund Trust makes grants to support projects that benefit people from the Armed Forces Community. This can include projects to support children from Armed Forces Families and projects working with vulnerable adults.

The main responsibility of the Trust is ensuring the organisations that receive funding have adopted appropriate policies and procedures to ensure the safeguarding of children and vulnerable adults they have direct contact with.

Purpose

The aim of this policy is to set out the roles responsibilities for grant funded organisations and Trust staff working together with other professionals and agencies in promoting the welfare and safeguarding of vulnerable adults and children.

Trust staff rarely come into contact with vulnerable adults or children as part of their role, but on the occasions that they may visit a grant funded organisation this policy gives guidance on how to ensure they do not place themselves in situations where there could be safeguarding risk and what they should do if they witness or have a suspicion that abuse or neglect has taken place (see sections below for a list of categories).

Scope

All team members and trustees. It will be shared on our website and with grant partners as appropriate.

Report safeguarding concerns to:		
Name	Designation	Contact
Anna Wright	Chief Executive/Safeguarding lead	anna.wright@covenantfund.org.uk
Matthew Hall	Director of Finance and Operations/ Deputy Safeguarding Lead	matthew.hall@covenantfund.org.uk
Victoria Wilson	Safeguarding Trustee	victoria.wilson@roskill.net

Policy

Grant Funded Organisations

The terms and conditions under which the Trust provides funding to organisations includes a mandatory requirement to adopt policies and procedures to ensure the safeguarding of children and vulnerable adults with whom there is direct contact.

It is the responsibility of the organisations funded by the Trust to ensure that their safeguarding policies and procedures are fit for purpose given the specific nature of their work and the manner in which it is conducted. Therapies and medical interventions, where these form part of a project, must only be carried out by properly qualified and registered professionals.

Organisations are also required to inform the Trust in writing as soon as possible of any investigation concerning the organisation, trustees, directors, employees or volunteers carried out by the Police, Charity Commission, the Office of the Scottish Charity Regulator, the Charity Commission for Northern Ireland, HM Revenue & Customs or any other regulatory body.

If, however, there are credible grounds at any time to suspect that any grant funded organisation is in breach of its mandatory obligation to protect children and vulnerable adults then Trust staff will immediately suspend any grant payments until any third-party investigations have been carried out. If such an investigation finds there has been a breach of the duty of care, then the grant will be withdrawn under the Trust's withdrawal processes, according to the Terms and Conditions of grant, and may require the organisation to repay all or part of its grant, depending upon the facts.

Members of the public, grant holders and other interested parties are able to bring matters of concern to the attention of the Trust through the ***Raising a Concern policy***; available publicly on the Trust's website: [Raising a concern : Armed Forces Covenant Fund Trust](#)

Trust Staff - Visits

When on a project visit, Trust staff must not be left in a room alone with a child or young person under 18, or a vulnerable adult who is a project beneficiary. If this seems likely to happen, then the Trust staff concerned must advise the organisation's management and/or the individual that they cannot do this, in line with this policy.

In the event that there is any cause for concern with regards to the adherence of an organisation to its mandatory obligations with regards to safeguarding then that Trust staff member must report the matter immediately to the Chief Executive Officer on their return when a decision will be taken as to whether to refer the matter to an appropriate agency.

When representing the Trust on a visit, Trust staff must always wear their name badge, so they are easily identifiable.

Trust Staff – Reporting

If Trust staff receive an allegation from any party regarding safeguarding this must be immediately referred to the Chief Executive or Director of Finance and Operations. For any Trust funded grants, the Chief Executive or Director of Finance and Operations will discuss this with the Head of Risk and Compliance. They will review the veracity of the claim, as far as possible, and manage making the referral to an appropriate agency using the process set out in Annex 1. The grant will also be suspended so that no further payments will be made until the issue is resolved.

Whilst Trust staff can investigate the veracity of a claim, it is **not** the responsibility of Trust staff to investigate any safeguarding concern, and a referral must be made to an appropriate agency.

When making the referral, due consideration must be given to GDPR; ensuring that sensitive personal data is transferred safely, and to a person with the appropriate regulatory responsibility to be able to carry out an investigation. Where information needs to be shared

with additional agencies due to grant management concerns, personal data of a vulnerable person must only be shared where this is to prevent harm, or where there is an appropriate ground under GDPR to enable the data sharing to take place.

However, if an allegation is confirmed following a third-party investigation, then Trust staff will instigate its withdrawal processes.

Any situation that is considered a risk to the Trust will be reported to the Safeguarding Trustee.

If an allegation is made about a member of Trust staff this should be immediately reported to the Safeguarding Lead or Deputy Safeguarding Lead for investigation.

Training

Trust staff will be required to read this policy on joining the organisation and upon any changes being made.

The Safeguarding Lead and Deputy Safeguarding Lead will attend suitable training on an annual basis and disseminate any relevant changes.

The sections below contain some examples of the types of abuse, or safeguarding concerns that may arise within the Trust's grant-funded projects. These lists are not exhaustive and have been included to help increase awareness.

Types of Abuse - Adults

Adults can be vulnerable due to their mental or physical health needs, or additional factors. Safeguarding is for people who, because of issues such as dementia, learning disability, mental ill-health or substance abuse, have care and support needs that may make them more vulnerable to abuse or neglect.

There are a number of categories of abuse that could be experienced by vulnerable adults:

- Physical abuse
- Domestic abuse
- Sexual abuse
- Emotional or psychological abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Neglect and acts of omission
- Self-neglect
- Cyber-bullying,
- Forced marriage
- Hate crime
- Sexual exploitation
- Criminal exploitation
- Radicalisation

Types of Abuse – Children

Child protection refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

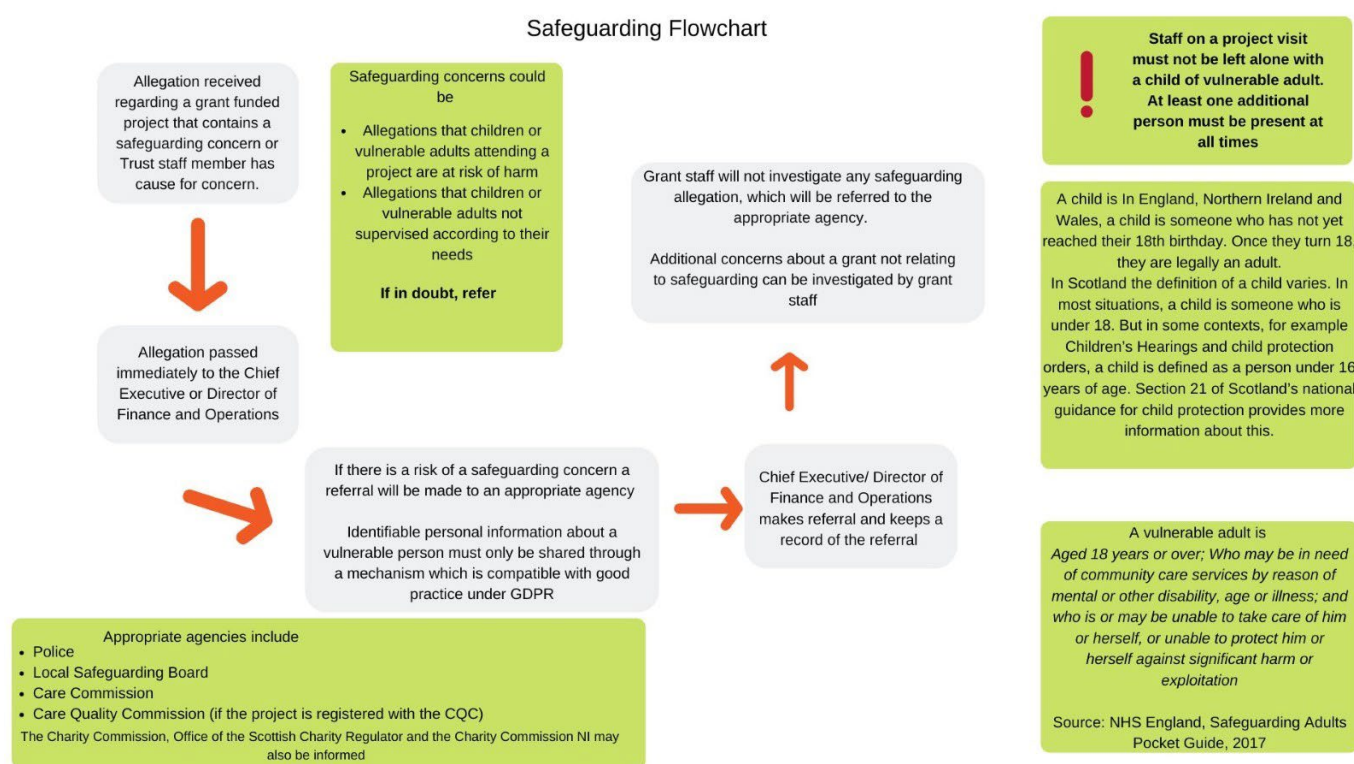
Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

"Children" includes everyone under the age of 18.

Flowchart of the safeguarding process



Responsibility

Document Control

Written by/owner:	Anna Wright, CEO & Senior Management Team
Approval Date:	January 2026 – Audit and Risk Committee February 2026 - Board
Next Review Date	January 2027 – Audit and Risk Committee February 2027 - Board

AI table

AI Transparency statement		Comments
☐	Generated using AI	
☐	Improved using AI	
☐	Suggested using AI	
☐	Corrected using AI	

Equalities duty

Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?

Final Decision:

- 1. No barriers identified, therefore activity will proceed.

Appendix: Document History

Revision date	Author	Change description(s)
<i>Feb 2025</i>	<i>Corporate Governance Manager</i>	<i>Rewrite</i>
<i>Jan 2026</i>	<i>Corporate Governance Manager</i>	<i>Move to new template, change of name of Director of Finance and Operations</i>