



Adult Safeguarding Policy

This policy applies to all areas of work conducted by Make-A-Wish UK, including activities undertaken by Make-A-Wish UK staff and volunteers.

Last updated: July 2026

If you need to log a Safeguarding concern now please see [Appendix 4](#)

Contents

1. Adult Safeguarding Policy.....	6
1. 1 Purpose	6
1.2 Definition.....	6
1.3 Responsibilities	7
1.4 Our approach	7
1.5 Related policies and procedures	8
7. Law and guidance.....	8
2. Recognition of child abuse and neglect.....	10
2.1 Introduction	10
2.2 Principles of the procedures.....	10
2.3 Recognition of abuse	11
2.4 A concern about the safety of a child	11
2.5 Historical or non-recent allegations of abuse	11
2.6 Fairness, inclusion and equality	11
3. What to do if you have a safeguarding concern about a child or young person	12
3.1 Responding to a safeguarding concern about a child	12
3.2 Safeguarding overseas children from affiliates/chapters that come to the UK for wish fulfilment.....	13
3.3 Responding to a direct disclosure of abuse	13
3.4 Responding to a child protection emergency.....	14
3.5 Information sharing and confidentiality	14
3.6 Consent	14
3.7 The need for support services	15
3.8 What to do if you have safeguarding concerns outside your employment or volunteering for Make-A-Wish UK	15
4. What to do if there is a safeguarding allegation against an employee or volunteer or an employee of a partner or supplier.....	17
4.1 Definition of a safeguarding allegation.....	17
4.2 Consideration.....	17
4.3 Confidentiality.....	18
4.4 What to do when there is a safeguarding allegation against an employee or supplier.....	18

4.5 Action following the conclusion of the investigative process	20
4.6 Poor Practice.....	21
4.7 DSM & Head of People	21
4.8 References	22
4.9 What to do when there is a safeguarding allegation against an employee of a partner or supplier	22
5. Resolution and escalation	22
6. Recording, records retention and destruction	23
6.1 Recording	23
6.2 Creation and Maintaining	23
6.3 Additional Records	23
6.4 Records of Safeguarding Allegations	24
6.5 Safeguarding Concern Form	24
6.6 Retention.....	24
7. Safeguarding arrangements in wish granting	24
7.1 Safeguarding within contractual arrangements	24
7.2 Safeguarding during the wish realisation	24
7.3 Sponsors of a wish.....	25
7.4 Travelling abroad for wish realisation	25
Appendix 1 : Safeguarding Terminology	26
Appendix 2 : Safeguarding Roles and Responsibilities	27
Appendix 3 : Key Safeguarding Legislation and Guidance in the UK	29
Appendix 4 : Safeguarding Concern Form	36
Appendix 5 : Safeguarding Concern and Action Log	39
Appendix 6 : Contacts for Safeguarding	40
Appendix 7 : FLOWCHART - What to do if you have safeguarding concerns about a child or adult at risk	41
Appendix 8 : FLOWCHART – What to do if there are concerns or allegations made about a MAWUK employee, volunteer or adult from a partner affiliate	42
Appendix 9: Safeguarding Code of Conduct	

1. Adult Safeguarding Policy

1.1 Purpose

Make-A-Wish UK creates life changing wishes for children with critical illnesses. In so doing it is our aim to provide children with wonderful memories, build happiness and confidence, as well as providing respite from the challenges that come with critical illness. The safety and well-being of all of our stakeholders is paramount to everything we do at Make-A-Wish UK. Therefore, our Adult Safeguarding Policy, as well as our Child Safeguarding and Protection Policy, are an essential foundation to all the work we do. We recognise that children who are critically ill or disabled may be particularly vulnerable and so we must ensure everything possible is done to ensure that they are protected from harm during their engagement with our organisation and in wish fulfilment. We also acknowledge the risks to adults both in the delivery of our work and the potential to be exposed to safeguarding concerns through contact with other adults.

Child and adult abuse can have serious consequences including injury, disability, threats to survival or even death. It can affect a person's development, mental health, ability to form relationships including parenting ability, self-confidence or achievements. It can have huge personal and economic consequences for the individual, their family, community and society.

Make-A-Wish UK has a duty of care for its employees and volunteers as well as for our beneficiaries. We recognise our staff and volunteers need protection from bullying, harassment and sexual harassment too. Our Adult Safeguarding Policy alongside other related policies and procedures that promote a safe and trusted work environment, will serve to protect all as well as preserve the reputation of our organisation and brand. This document focuses on the protection of adults and we have a separate policy for Child Safeguarding and Protection.

This document focuses on the protection of adults (18 years +), in particular those with care and support needs and we have a separate policy for Child Safeguarding and Protection. It is the responsibility of employees, volunteers and suppliers to report if there is a cause for concern about an adult or the behaviour of another person towards an adult but it is not their responsibility to determine if abuse has occurred or what protective action is required. Responsibility for deciding whether to escalate a concern to the appropriate authority lies with those employees and volunteers who have specific safeguarding responsibilities within Make-A-Wish UK

Make-A-Wish UK will not tolerate the abuse of adults in any of its forms and is committed to safeguarding adults with care and support needs from harm. This policy outlines the steps Make-A-Wish UK will make to safeguard an adult with care and support needs if they are deemed to be at risk or a risk. This policy sets out the roles and responsibilities of Make-A-Wish UK in working together with other professionals and agencies in promoting the adult's welfare and safeguarding them from abuse and neglect.

Make-A-Wish UK will ensure that decisions made will allow adults to make their own choices and include them in any decision making. Make-A-Wish UK will also ensure that safe and effective working practices

are in place. This policy is intended to support staff and volunteers working within Make-A-Wish UK to understand their role and responsibilities in safeguarding adults.

All staff and volunteers are expected to follow this policy. The key objectives of this policy are for all employees and volunteers of Make-A-Wish UK to:

- have an overview of adult safeguarding
- be clear about their responsibility to safeguard adults
- ensure the necessary actions are taken where an adult with care and support needs is deemed to be at risk

This policy is based on:

- The Care Act 2014 and the Care and Support statutory guidance

Under the Human Rights Act 1998, everyone has the right to live free from abuse and neglect.

<https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

1.2 Definition

‘Safeguarding means protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.’

Care and Support Statutory Guidance, Department of Health, updated February 2017

All adults should be able to live free from fear and harm. But some may find it hard to get the help and support they need to stop abuse. An adult may be unable to protect themselves from harm or exploitation due to many reasons, including their mental or physical incapacity, sensory loss or physical or learning disabilities. This could be an adult who is usually able to protect themselves from harm but maybe unable to do so because of an accident, disability, frailty, addiction or illness.

Make-A-Wish UK adheres to following the six key principles that underpin safeguarding work, in keeping with Care Act guidance:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

Staff and volunteers should ensure that their work reflects the principles above and ensure the adult with care and support needs is involved in their decisions and informed consent is obtained. Make-A-Wish UK should ensure that the safeguarding action agreed is the least intrusive response to the risk. Partners from the community should be involved in any safeguarding work in preventing, detecting and reporting

neglect and abuse. Make-A-Wish UK should be transparent and accountable in delivering safeguarding actions.

Definition of Child / Adult: Legally, a child includes babies, children and young people from pre-birth up to 18 years and an adult is any person who has reached or is beyond their 18th birthday. The fact that a young person has reached the age of 16, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody does not change their entitlement to protection. There is no legal definition for the age of a 'young person' rather those aged 16 and 17 years old are still children in legal terms for the purpose of safeguarding.

The exception to this is in Scotland where a child legally becomes an adult when they turn 16, but statutory guidance which supports the Children and Young People (Scotland) Act 2014 includes all children and young people up to the age of 18. Where concerns are raised about a 16 or 17 year old, agencies may need to refer to the Adult Support and Protection (Scotland) Act 2007, depending on the situation of the young person at risk.

Who do adult safeguarding duties apply to?

The Care Act 2014 sets out that adult safeguarding duties apply to any adult who:

- has care and support needs, and
- is experiencing, or is at risk of, abuse and neglect, and
- is unable to protect themselves from either the risk of, or the experience of abuse or neglect, because of those needs.

Throughout this policy and in the supporting literature and guidance, adults included in this definition are referred to as *vulnerable adults*. As above, the Care Act 2014 sets out specific safeguarding duties that apply to this adults who fall within this definition.

See Appendix 1 for further definitions of key safeguarding terms

1.3 Responsibilities

Whilst the Board of Trustees holds ultimate responsibility for safeguarding, we have identified specific employees and volunteers to embed and operationalise the Adult Safeguarding Policy on a day-to-day basis. Their role and responsibilities are set out in **Appendix 2**.

1.4 Our approach

We will create a culture and working practices that endeavour to prevent and deter any actions or omissions, whether deliberate or inadvertent, that place adults at risk of harm. Therefore, we will:

- Provide a Safeguarding Code of Conduct for employees and volunteers
- Provide safeguarding reporting procedures
- Establish a safeguarding governance structure with assigned roles and responsibilities
- Provide effective management through induction, supervision, appraisal and support which all integrate safeguarding

- Promote a work culture that supports the reporting and resolution of allegations, suspicions or concerns about abuse of any kind or inappropriate behaviour
- Have a clear approach within our organisation to prevent abuse of trust and power including bullying, harassment, sexual harassment discrimination or victimisation.
- Provide employees and volunteers with training appropriate to their safeguarding responsibilities
- Take appropriate action, including disciplinary, legal or other action in response to any breaches of our Adult Safeguarding Policy
- Inform our partners, affiliates and suppliers about our Adult Safeguarding and Child Safeguarding and Protection Policies and have proportionate safeguarding expectations of them
- Ensure safeguarding requirements are built into our fundraising and volunteering activities as necessary
- Ensure that we take, use and store images used for promotional purposes in a way that is consistent with safeguarding and data protection principles
- Quality assure our safeguarding practice to draw out any lessons learnt or implications for improvements to our policy and procedures
- Maintain a safeguarding working group to ensure implementation of this policy and regularly review management of safeguarding concerns.
- Review our Adult Safeguarding Policy on an annual basis or sooner if required due to legal changes and/or any learning from incidents

1.6 Related policies and procedures

Safeguarding is a broad concept. There are other Make-A-Wish UK policies and procedures which contribute to safeguarding and to providing a safe and trusted environment and these must be followed by those to whom they apply or when the circumstances require it:

Equal Opportunities Policy
Volunteer Guidebook
Data Protection and Confidentiality Policy
Whistleblowing Policy
Disciplinary Policy
Recruitment and Selection Policy
Lone Working Policy and personal safety Guidance
IT, Email and Internet Policy
Complaints Policy
Criminal Records Vetting How To Guide
Social Media Guidelines
Use of Images – film and photography policy

1.7 Law and guidance

Our Safeguarding Policy and Procedures are underpinned by UK legislation and statutory guidance. The key legislation is highlighted in **Appendix 3**.

2. Recognition of adult safeguarding concerns

2.1 Introduction

The Safeguarding Procedures are a key element of how Make-A-Wish UK seeks to safeguard and protect all those with whom we engage as well as our employees, volunteers, partners, suppliers and affiliates. If you have any comments or concerns about these Procedures please notify the DSM or DSOs [see **Appendix 6** for contact details].

2.2 Principles of the procedures

The '5Rs' underpin these reporting procedures as follows:

- **Recognise** concerns that an adult is being harmed or might be at risk of harm
- **Respond appropriately** to the person who is telling you what is happening to them
- **Refer** the concerns on to your DSO or straight to the emergency services (if the incident warrants this)
- **Record** the concerns appropriately and any subsequent action taken
- **Resolution** and escalation are the responsibility of the DSOs or DSM to follow up referrals made to the authorities and if necessary, escalate concerns if identified risks remain.

2.3 Recognition of abuse

What are the types of abuse in relation to safeguarding adults?

The Care and Support statutory guidance sets out the 10 main types of abuse:

- Physical abuse
- Neglect
- Sexual abuse
- Psychological
- Financial abuse
- Discriminatory
- Organisational
- Domestic violence
- Modern Slavery
- Self-neglect

However, you should keep an open mind about what constitutes abuse or neglect as it can take many forms and the circumstances of the individual case should always be considered. For more information, read section 14.17 of the Care and Support Statutory Guidance.

More than one type of abuse may be occurring simultaneously or sequentially. You are not expected to know if abuse has occurred, rather you need to be alert to possible indicators and share any concerns as outlined in these safeguarding procedures.

What are the possible signs of abuse?

Abuse and neglect can be difficult to spot. You should be alert to the following possible signs of abuse and neglect:

- Depression, self-harm or suicide attempts
- Difficulty making friends
- Fear or anxiety
- The person looks dirty or is not dressed properly
- The person never seems to have money
- The person has an injury that is difficult to explain (such as bruises, finger marks, 'non-accidental' injury, neck, shoulders, chest and arms)
- The person has signs of a pressure ulcer
- The person is experiencing insomnia
- The person seems frightened, or frightened of physical contact.
- Inappropriate sexual awareness or sexually explicit behaviour
- The person is withdrawn, changes in behaviour

You should ask the person if you are unsure about their well-being as there may be other explanations to the above presentation.

Who abuses and neglects adults?

Abuse can happen anywhere, even in somebody's own home. Most often abuse takes place by others who are in a position of trust and power. It can take place whether an adult lives alone or with others. Anyone can carry out abuse or neglect, including:

- partners;
- other family members;
- neighbours;
- friends;
- acquaintances;
- local residents;
- people who deliberately exploit adults they perceive as vulnerable to abuse;
- paid staff or professionals; and
- volunteers and strangers

2.4 A concern about the safety of an adult might arise because:

- An adult says that s/he is being abused or is telling you about something that has happened to them that you think would be harmful
- You see possible signs of abuse or neglect
- Somebody says that an adult is being harmed or is at risk of harm
- The behaviour of an adult gives cause for concern
- An adult shares their experience of abuse in their past - this may be referred to as 'historical or nonrecent abuse'.

2.5 Historical or non-recent allegations of abuse

Historical or non-recent allegations of abuse are any concerns that relate to abuse that happened more than a year ago, whether involving anyone working for Make-A-Wish UK or outside of it. Such allegations of abuse must be taken seriously and acted upon in line with these procedures even if the victim is no longer being harmed now. Often victims of abuse take many years to come forward due to shame and a fear of being disbelieved however the alleged perpetrator may remain a risk to others. Make-A-Wish UK should report such cases and concerns to the local authority and/or the police following the procedures laid out in Sections 4 - 6.

2.6 Fairness, inclusion and equality

Everyone must guard against not sharing their concerns in the belief that they are protecting a person's cultural or religious beliefs or through fear that their action might be interpreted as being prejudiced. Everyone is entitled to equal protection.

3. What to do if you have a safeguarding concern about an adult

Note all necessary contact details are in **Appendix 6**.

3.1 Responding to a safeguarding concern about an adult

If you identify a safeguarding concern which is **not** immediately life-threatening or presents a high risk of serious harm, you must:

Step 1 Contact a designated safeguarding officer (DSO) to discuss your concern (see Appendix 6 for DSO details). This should be done as soon as possible and always on the same day that you identify the concern. Notify your line manager about this too.

Step 2 A record of what was seen, said and done needs to be made on the Safeguarding Concern Form (Appendix 4).

Step 3 The DSO will determine what action is necessary. The options for the DSO are:

- no action is required as it does not constitute a safeguarding concern
- monitor the situation and arrange to speak with the person concerned again
- seek advice from one or more of the following: adult social care services (or equivalent in other nations¹), police, or the designated safeguarding manager (DSM)
- make a formal referral to adult social care services (or equivalent in other nations) and also to the police if it's thought a crime has been committed.

¹ Scotland: Local authority children's social work team.

Northern Ireland: Gateway Services Team for the relevant Health and Social Care Trust.

Wales: Local authority child protection services.

Step 4 The DSO must record whatever decision is taken on the Safeguarding Concern Form (Appendix 4) with a rationale even if no further action is to be taken. A decision to take no further action or monitor a situation is as serious as a decision to make a referral out.

Step 5 The DSO must consider if consent is required from the adult in question in order to share the concern with the local authority and/or police. The DSO may not be in a position to gain consent to share information, but this should be considered and the decision recorded.

Step 6a If the DSO decides to make a referral to adult social care services or police (unless it is an emergency or the DSO considers it better for the person with the concern to make the referral and report back) then the DSO must:

- put the referral in writing within 48 hours. Each local authority has a process for receiving referrals and so the DSO must use the relevant process in the area which will be found on their website
- seek feedback after three working days of having made the referral to check it's been received and action taken

Or

Step 6b If the adult subject to the concern is under the care of another organisation (e.g. school or hospital) then the DSO must alert the designated safeguarding officer in the other organisation for them to act. In such cases the DSO must also:

- put the information in writing, marking it 'personal and confidential' within 24 hours of speaking with the other organisation about the concern
- seek feedback after 3 working days to check the information has been received and is being acted upon appropriately by the other organisation

Step 7 The DSO must keep a record of all the actions taken, decisions made and any outcomes in accordance with good practice on recording and information storage and retention (see Section 7).

Step 8 The DSO must consider if the person who first raised the concern needs any support and who can provide it.

See **Appendix 7: Flowchart - What to do if you have a Safeguarding Concern**

3.2 Safeguarding overseas adults from affiliates/chapters that come to the UK for wish fulfilment

If there are safeguarding concerns about a child in these circumstances, then you must follow the procedures as in 4.1. However, the difference is that the DSO must liaise with the affiliate about the concern and agree together what action will be taken in the UK or in the affiliate/chapter country. The exception to this would be where there is a situation in the UK that requires immediate proactive action. In this instance, the procedure in 4.4 must be followed and then the DSO will also need to inform the affiliate/chapter of such action having been taken and together plan what further action is required once the immediate emergency has been resolved.

3.3 Responding to a direct disclosure of abuse

Sometimes an adult will tell someone about their experience of abuse or the way they are being treated by someone else. You should respond in the following ways and then follow the procedures in paragraph 4.1:

Do

- Show you care, help them open up: give your full attention and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important.
- Take your time, slow down: respect pauses and don't interrupt – let them go at their own pace. Recognise and respond to their body language.
- Show you understand, reflect back: make it clear you're listening. Reflect back what they've said to check your understanding – and use their language to show it's their experience.
- Reassure them that they've done the right thing in telling you. Make sure they know that abuse is never their fault.
- Explain what will happen next in terms of the process within Make-A-Wish UK

Do not:

- React strongly – for instance saying, 'that's terrible'
- Jump to conclusions especially about the abuser
- Tell them you will keep this a secret
- Ask leading questions
- Make promises you cannot keep
- Stop them from speaking freely
- Tell them to stop talking so that you can fetch a DSO

3.4 Responding to an emergency

In an emergency where a person has been seriously hurt or is in imminent danger of being harmed you should:

- Ring 999 and ask for the emergency service required - police and/or ambulance;
- Inform a DSO and the designated safeguarding officer in the premises of any another organisation where this situation is happening
- If the DSO is not available then inform another DSO or DSM
- The procedures in 4.1 must then be followed by the DSO

3.5 Information sharing and confidentiality

Organisations working with vulnerable adults have a duty to share information with other agencies where relevant to safeguarding. Information may be shared without consent if Make-A-Wish UK believes there is good reason to do so, and that the sharing of information will enhance the protection of a vulnerable adult in a timely manner. Information should be shared on a need to know basis only, as judged by the

DSO and/or DSM. Employees and volunteers must be aware that they cannot promise any vulnerable adult that they will keep information confidential when it's about safeguarding concerns or allegations.

3.6 Consent

The following principles apply:

- Ideally information should be shared where there is consent for so doing
- Data protection law and regulations should be considered but are not a barrier to sharing important information about safeguarding
- Be open and honest about what you will do with the information
- Always consider the safety of the person concerned
- Ensure what is shared is it necessary, proportionate, relevant, accurate, timely and secure.
- Don't assume that someone else will pass on information that they think may be critical to keeping a vulnerable adult person safe.
- Keep a record of what information has been shared and the reason for seeking consent or not, using the Safeguarding Concern Form (Appendix 4) or Safeguarding Action Log (Appendix 5)

3.7 The need for support services

Where you think that an adult needs support services for their welfare rather than a need for protection, then you should speak to your line manager about what to do. No referral can be made to any support service without the consent of the adult therefore a discussion with them would be necessary. Use the Safeguarding Concerns Form (Appendix 4) to jot down what action, if any, has been taken and send it to the DSO.

3.8 What to do if you have safeguarding concerns outside your employment or volunteering for Make-A-Wish UK

3.8.1 When Make-A-Wish UK employees or volunteers are outside of their employment or volunteering role for us or outside of work as a member of the public, they may identify safeguarding concerns. For example, in their own family or networks, community, neighbourhood or through other activities in which they participate.

Make-A-Wish expects its employees and volunteers, to act on any safeguarding concerns by taking advice and/or reporting them.

3.8.2 If the concerns arise in the course of working, or volunteering for another organisation.

- Follow the safeguarding procedures of that organisation if they are in place.
- If the organisation has no safeguarding procedures of its own, then the concerns should be shared with the local adult social services (or equivalent) or the appropriate emergency service(s) by calling **999** if a adult is at immediate risk of harm or if they need urgent medical attention

3.8.3 If Make-A-Wish employees or volunteers identify safeguarding concerns outside of a work or volunteering role, then:

- if the adult is at immediate risk of harm - call emergency services on 999 *or*
- if the adult is not at risk of immediate - contact local adult social care services.

4. What to do if there is a safeguarding allegation against an employee or volunteer or an employee of a partner or supplier

4.1 Definition of a safeguarding allegation concerning adults

This is where a person has:

- a) Behaved in a way that has harmed a vulnerable adult, may have harmed a vulnerable adult or might lead to a vulnerable adult being harmed.
- b) Possibly committed or is planning to commit a criminal offence against a vulnerable adult or related to a vulnerable adult or;
- c) Behaved towards a vulnerable adult in a way that indicates s/he is or would be unsuitable to work with vulnerable adults.

The allegation may:

- Involve a child/ren, or adults(s) or both
- Not directly have a victim as such. For example, if someone is looking at abusive images online or using the internet to groom vulnerable adults with the intent to harm in future;
- Be about any type of abuse;
- Concern a breach of the Make-A-Wish UK Safeguarding Code of Conduct;
- Relate to a person who no longer works or volunteers for Make-A-Wish UK (known as a 'historical non-recent allegation')
- Concern a vulnerable adult known to an employee or volunteer outside of their Make-A-Wish duties

A safeguarding allegation may arise when:

- A vulnerable adult, or an advocate, relative or other person makes an allegation against an employee, volunteer, partner or supplier
- Harmful behaviour is observed
- Make-A-Wish UK receives a safeguarding allegation from any individual during another internal procedure, for example in respect of a misconduct enquiry or complaint
- Make-A-Wish UK is informed by the police or local authority or an individual that they are the subject of a criminal investigation
- New information is contained in a Disclosure and Barring Service (DBS) renewal check.

4.2 Consideration

There may be up to four strands in the consideration of any safeguarding allegation:

- Enquiries and assessment by adult social care services about whether a vulnerable adult needs support services
- A police investigation if a criminal offence may have been committed
- Consideration by an employer of disciplinary action in respect of the individual or volunteer resolution in respect of a volunteer
- Referral for 'consideration to bar' a person from working with vulnerable adults (i.e. referral to the Disclosure and Barring Service) and/or referral to a professional registration body for professional misconduct.

4.3 Confidentiality

If any employee/volunteer is concerned about the behaviour of another employee/volunteer then they should not worry about the confidentiality of this information. Even if it turns out to be mistaken, it is better to discuss it and enable a proper investigation and assessment to happen than not report it at all. Do not:

- Ignore concerns
- Confront the person
- Discuss the matter with anyone else apart from those identified in this procedure.

4.4 What to do when there is a safeguarding allegation against an employee or supplier

Step 1 The person should speak to their line manager/volunteer manager unless the concern is about them in which case go to the next manager or the Designated Safeguarding Manager (DSM). This should be done within this same working day of the allegation coming to light.

Step 2 If the line manager/Volunteer manager thinks this incident does constitute a safeguarding allegation then they should contact the DSO and complete the Safeguarding Concern Form (Appendix 4).

Step 3 If it is considered that a vulnerable adult is subject to an immediate risk of serious harm, or needs emergency medical attention, then the emergency services must be contacted straight away.

Step 4 The DSO must inform the DSM within 24 hours about the safeguarding allegation and in turn they will consult with the Head of People to consider if the allegation is a safeguarding one. If the DSM is on leave or not available, then the DSO will contact the Head of People. The DSM will oversee the management of all allegations together with the Head of People.

Step 5 The DSM and Head of People are responsible for agreeing an initial plan of how to proceed with managing the allegation. The safeguarding allegation may be in respect of the person's employment or volunteering or behaviour towards any other adults or children.

Step 6 If, after the initial consideration, the DSM and Head of People do not consider the matter constitutes a safeguarding allegation (as defined in 5.1) then they must decide if an internal investigation is required to determine if the behaviour/incident was related to poor practice or misconduct and then

follow the appropriate procedure to address this. All decisions and the reasons for them, including there being no need to take safeguarding action, must be recorded and kept separate from the individual's centrally held employee information held but with a cross reference to it.

Step 7 If confirmed as a safeguarding allegation, the DSM and Head of People must agree an initial plan within one working day. They should consider:

- the immediate safety of any relevant people involved, for example those that are the subject of the safeguarding allegation or other people that the individual has contact with through work or family
- what information to share with the individual who is the subject of the safeguarding allegation
- whether any immediate decision should be taken about suspension of the individual subject to allegation, pending further enquiries and/or investigation
- delegation of tasks to the DSO
- if any records need to be secured or 'locked down, or any equipment removed from the individual who is the subject of the allegation
- whether the criteria are met for referral to the local authority and/or the police;
- whether the criteria are met for a serious incident report/notification to be made to the Charity Commission for England and Wales or Charity Commission for Northern Ireland or Office of the Scottish Charity Regulator³
- if further information is required for clarification
- identifying who else is aware of the safeguarding allegation and who has been spoken to
- whether advice should be sought from the local authority designated officer (LADO)⁴
- any arrangements to support the person who is the subject of the safeguarding allegation, the person who raised the allegation and the alleged victim

In addition, there may need to be a plan around the management of information including:

- who needs to know and what information can be shared within Make-A-Wish UK
- how to manage speculation, leaks and gossip
- what, if any, information can reasonably be given to reduce speculation
- how to manage press interest if, and when, it might arise.

If a safeguarding allegation is made against:

DSO - the DSM and Head of People will manage the allegation process

DSM - the Head of People and CEO will manage the allegation

Head of People – the DSM and a nominated member of SLT

CEO – a board member and Head of People

Step 8 If it is agreed that the safeguarding allegation meets one or more of the criteria in Section 5.1 then the DSM or Head of People must make a referral within one working day to:

- the Designated Officer for the Local Authority (usually referred to as the LADO) where the child resides (i.e. there is an identifiable victim)

- the LADO (or equivalent) where the employee, volunteer, freelancer resides if the allegation is about adult behaviour but with no identifiable victim⁵.

The LADO will:

- discuss the allegation and obtain further details of the allegation and the circumstances in which it was made;

³ Trustees should make a report to the Charity Commission if any of the following occur:

- beneficiaries of MAWUK) have been, or alleged to have been, abused or mistreated while under the care of MAWUK, or by someone connected with it, for example a trustee, employee or volunteer
- there has been an incident where someone has been abused or mistreated (alleged or actual) and this relates to the activities of MAWUK
- there has been a breach of procedures or policies at MAWUK which has put beneficiaries at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or adults

Source: <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity> [accessed 20/6/19]

⁴ LADO role exists in England only. Sometimes it's also shortened to DOLA instead in England. This role does not exist in other nations so instead refer to the following:

Scotland: local authority children's social work team

Northern Ireland: Gateway Services Team for the relevant Health and Social Care Trust

Wales: local authority child protection services

⁵ An example of this would be where someone has been watching obscene images of children online

- discuss whether there is evidence/information that establishes the allegation is false or unfounded
- discuss whether any other employer needs to be informed if its known the person works elsewhere with children

Step 9 If the allegation is referred out to the local authority, then any safeguarding investigation and/or police investigation must take priority over any internal Make-A-Wish UK HR processes.

Step 10 The DSM and Head of People will need to determine if the allegation warrants Make-A-Wish UK to suspend the employee who is the subject of the allegation or cease to deploy a volunteer. The act of suspension does not indicate a person's guilt. An individual must not be suspended automatically when there has been an allegation without careful thought. Suspension should be considered in any case where:

- there is cause to suspect a person is at risk of significant harm
- or, the allegation warrants investigation by the police
- or, is so serious that it might be grounds for dismissal
- or, there are concerns that the person about whom the allegations are made may put pressure on or interfere with potential witnesses.

The power to suspend the accused employee or dispense with the services of a volunteer is vested in the employer alone. However, in making these decisions the DSM in consultation with the Head of People will need to take into consideration the views of the police and the local authority.

4.5 Action following the conclusion of the investigative process

4.5.1 At the conclusion of any external investigations, the DSM in conjunction with the Head of People and the LADO will formally review the outcome and determine if any further action is required. The range of options open will depend on the circumstances of the case and will need to consider the result of any police investigation or trial, any investigations in respect of external parties, as well as the different standard of proof required in disciplinary and criminal proceedings. Options include:

- reintegration of the employee or volunteer
- instigate the disciplinary process in respect of employees or the volunteer resolution process in respect of volunteers
- alerting other known employers of the individual concerned (which is a responsibility of the LADO to do if necessary)
- making a referral to the DBS (or equivalent body in the other UK nations²) for consideration to bar the person from working with vulnerable adults and/or children if they were working in 'regulated activity'. The referral process is outlined on the DBS website and they can be contacted for advice. The DSM or Head of People are responsible for making such a referral.
- alert the relevant Charity Commission of the outcome as per their serious incident reporting requirements.

4.5.2 The following definitions should be used when recording the outcome of allegation:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and that there has been a deliberate act to deceive
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation.

Every effort should be made to reach a conclusion in all cases even if:

- the individual refuses to cooperate, although they should be given a full opportunity to answer the allegation and make representations
- it is difficult to reach a conclusion
- the employee has resigned or the freelancer or volunteer withdraws their services
- the person is deceased.

4.5.3 In these circumstances Make-A-Wish UK never agrees to the use of a 'settlement agreement' or non-disclosure agreement with any person, that is if the person subject to the allegation resigns, Make-A-Wish UK would independently decide whether to pursue disciplinary action, and would reflect the reason for leaving in any future references requested. Such employee relations issues cannot be used to override Make-A-Wish UK's duty to make a referral to the DBS where they meet the criteria for consideration to bar an individual from working with children or vulnerable adults.

² DBS covers England and Wales. In Scotland refer to Disclosure Scotland. In Northern Ireland refer to AccessNI

4.5.4 The DSM and Head of People must determine who needs feedback following the conclusion of any investigations and ensure feedback is given in accordance with the principles of data protection and confidentiality.

4.5.5 If an allegation is determined to be false or malicious, the DSM with the Head of People must consider if any further action is required which includes:

- if the safeguarding allegation was deliberately invented or malicious then this should be discussed with the police and advice sought
- whether disciplinary action is required (in respect of employees) or volunteer issue resolution (in respect of volunteers)
- the support needs of the person that was the subject of the safeguarding allegation or the person that was harmed.

4.5.6 At the end of the process of managing an allegation and its conclusions, the DSM and Head of People are responsible for the identification of any lessons learned. This learning may need to feed into policy and procedural revisions and/or safeguarding training.

4.5.7 The DSM must provide in writing feedback to the person who has been subject to the investigation, clarifying the outcome and any implications for their employment. This must be provided within five working days of the conclusion of the investigation.

4.6 Poor Practice

There may be circumstances where allegations are about poor practice rather than abuse, for example the employee or volunteer has not adhered to an aspect of the Code of Conduct but this was minor and did not result in any harm. Where there is any doubt, the line manager should consult with the DSO/DSM. If enquiries indicate that the allegation is about poor practice then Make-A-Wish will determine how best to address this. A pattern of low level concerns should be taken seriously and addressed through employment policies and procedures.

4.7 DSM & Head of People

The DSM and Head of People are responsible for ensuring that the person who is the subject of the allegation is:

- informed of the allegation against them (once agreed by the local authority/police), notified of the processes that will follow and signposted to support should they require it
- kept up to date about any progress in relation to their case
- advised to contact their union or professional association at the outset if applicable
- kept up to date about what is happening in the workplace in cases where the person is suspended or ceased to use their services. This is to enable their reintegration should they return to work/volunteering
- sent correspondence confirming all of the above including the arrangements for support.

4.8 References

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references.

4.9 What to do when there is a safeguarding allegation against an employee of a partner or supplier

If an employee or volunteer identifies a safeguarding allegation (see para 6.1 for definition) because of the behaviour of an employee of a partner or supplier towards a vulnerable adult then:

Step 1 Speak to your line manager/volunteer manager. This should be done within this same working day of the allegation coming to light.

Step 2 If the line manager/volunteer manager thinks this incident does constitute a safeguarding allegation then they should contact the DSO and complete the Safeguarding Concern Form (Appendix 4).

Step 3 If it is considered that a vulnerable adult is subject to an immediate risk of serious harm, or needs emergency medical attention, then the emergency services must be contacted straight away. The procedures in Section 3 should be followed.

Step 4 The DSO must inform the DSM within 24 hours about the safeguarding allegation. If the DSM is on leave or not available, then the DSO will contact the Head of People to oversee the management of the allegation.

Step 5 The DSM should share details of the allegation with the partner or supplier organisation so that the organisation can address the matter. If the DSM considers a crime may have been committed, they should report this to the police unless the organisation intends to do this. The DSM may wish to consult with either the police or local adult social care for advice.

Step 6 the DSM should follow up with the organisation to ascertain that they have acted and note this. If the DSM is concerned that no appropriate action has been taken, they will have to consider whether to take independent action.

Step 7 The DSM should keep records of all actions, decisions and outcomes.

Step 8 Make-A-Wish UK will need to determine whether the partner or supplier can continue to be used in future depending on the nature of the allegation, its management and any identified risks.

5. Resolution and escalation

5.1 If, after reporting on a concern or allegation, it is evident that the local authority or police have not taken appropriate action in relation to the safeguarding concern or allegation, then the DSO must discuss this with the DSM to determine if the matter needs escalating with the local authority's adult social care

team. There are specific procedures to be followed in such instances as defined by each local authority's adult social care team.

5.2 Similarly, if the safeguarding lead in a partner/affiliate organisation has not taken appropriate action then the DSO should discuss this with the DSM to determine whether to make a referral out to the local authority or police or if advice needs to be sought about the matter from an external body.

5.3 A record of any decisions and outcomes must be kept by the DSO or DSM using the Safeguarding Action Log (Appendix 5).

5.4 If any employee or volunteer considers that the safeguarding concern or allegation that they have raised has not been taken seriously by Make-A-Wish UK they can raise the matter via the organisation's whistle blowing policy.

5.5 If Make-A-Wish UK fails to deal with any concerns appropriately or an individual continues to suspect serious wrongdoing, issues can be reported to the Charity Commission (England and Wales) or equivalent in other countries³ and may be reported anonymously.

7. Recording, records retention and destruction

7.1 Recording

It is essential that Make-A-Wish UK keeps clear and comprehensive records of any concern or allegation including details of how they were followed up and resolved, and details of the decisions reached and any action taken. The purpose of the record is to:

- enable accurate information to be given in response to any request for a reference
- provide clarification in cases where a future DBS disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction
- prevent unnecessary re-investigation should an allegation resurface after time
- provide evidence and information if a decision is made to refer the person for consideration to be barred from working with vulnerable adults and/or children
- enable Make-A-Wish UK to review and improve policies, procedures and practice

7.2 Creation and Maintaining

The DSO and DSM are responsible for creating and maintaining the record while managing a safeguarding concern or allegation.

³ Charity Commission Northern Ireland or Office of the Scottish Charity Regulator

7.3 Additional Records

Additional records e.g. email, electronic documents etc. must also be retained. Summaries of the content of these will be recorded on the Safeguarding Action Log (Appendix 5). At the end of the case the DSOs or DSM will create a file of all emails including scanned copies of all hard copy documents. The file must be linked to the Safeguarding Concern Form (Appendix 4). All original hard copy documents should be immediately destroyed (post scanning) using the shredder/secure paper collection.

7.4 Retention period for records of safeguarding allegations

Records of safeguarding allegations and any subsequent processes against employees or volunteers must be retained, including for people who leave the organisation, at least until the person reaches 65 years, or for 10 years if that is longer. The records must be stored securely in a password protected folder in a shared drive and with restricted access by the DSO and DSM and anyone else authorised by them. Details of allegations that are found to be malicious should be removed from personnel records.

7.5 Retention period for records of safeguarding concerns

All the information relating to a safeguarding concern about a vulnerable adult and subsequent action taken must be recorded using the Safeguarding Concern Form (Appendix 4) and the Safeguarding Action Log (Appendix 5). These records must be stored securely in a password protected folder in a shared drive and with restricted access by the DSO and DSM and anyone else authorised by them. These records should be retained for a period of 15 years or the period specified by your insurance or records retention policy if it's longer. The period of retention may need to be longer if there has been a complaint in respect of the case or legal proceedings. The reason for keeping a record for longer than 15 years must be documented to be in line with the principles of the data protection requirements.

7.6 Retention

Once the requisite retention period has been reached all records should be destroyed using shredding and confidential waste or be electronically purged.

8. Safeguarding arrangements in wish granting

8.1 Safeguarding within contractual arrangements (suppliers)

Make-A-Wish UK captures, identifies and arranges wishes for children and in so doing works with a range of others to deliver those wishes. This can involve established partners; tried and tested suppliers; third parties; gifts in kind from another organisation or person, and local suppliers. We want to ensure that no child or adult is put at risk of abuse or harm to their health and safety when wishes are fulfilled. Therefore, we will develop the following measures:

- Explicit safeguarding requirements we expect to be in place from all those individuals or organisations that fulfil wishes as part of contractual arrangements. This will be tiered and dependent on risk;

- Provide guidance for those who are choosing suppliers;
- Ensure that those who are fulfilling wishes are aware of our safeguarding policy and procedures and code of conduct;
- Ensure that parents are informed about our safeguarding and child protection policies and procedures and understand that they are accountable for their child's safety.

8.2 Safeguarding during the wish realisation

In granting wishes, the wish team must consider if the child and any vulnerable adults will be exposed to any risks during the wish. This could be regarding the actual activity (e.g. bungee jump), the location (e.g. abroad or online), the transport to reach the activity or the activity itself (e.g. ride in a sports car) or the adults involved (e.g. travelling abroad with one parent only).

To mitigate for such risks, we will:

- Provide generic risk assessments for our most popular types of wishes;
- Provide a process for doing bespoke risk assessments for high risk activities. Such high-risk activities will need additional sign off by a line manager;
- Ask for a copy of any risk assessments undertaken by suppliers for activities that are high risk and for which they are liable.
- Re-emphasise guidance in the Safeguarding Code of Conduct (Appendix 9), e.g. avoiding private or one-to-one unobserved situations.

8.3 Sponsors of a wish

Sometimes donors sponsor a wish. They are often keen to meet or reach out to the child which is very understandable. However, donors must not be put in direct contact with the child and their family. Rather any correspondence with the child and family should be made via the Make-A-Wish UK office and this should be made clear to donors at the outset. If feedback from the family is received it will be communicated via Make-A-Wish. The Uses of Images Policy provides additional guidance relating to this area.

8.4 Travelling abroad for wish realisation (Wish Assist)

Some wishes are fulfilled abroad and can be overseen by a counterpart in an affiliate/chapter. Normally we would always want two adults to be travelling with the child. If this is not possible or the child specifically wants to go with one adult only then there must be a crisis plan in place in case of anything unexpectedly happening whilst abroad and help being required from Make-A-Wish UK/ International / America or other family members. Where one or more of the adults travelling is considered a vulnerable adult from a safeguarding perspective, this must be documents and risks mitigated in the crisis plan and risk assessment.

Appendix 1: Safeguarding Terminology

For the purposes of the Safeguarding Children Policy and Procedures, the following terms and definitions apply:

Child abuse⁴: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children. There are four main types of harm: Physical abuse, sexual abuse and exploitation, neglect and emotional abuse.

Child at risk: This term is defined in Welsh legislation⁵ and refers to a child who; -

- a) is experiencing or is at risk of experiencing abuse, neglect or other kinds of harm; and
- b) has needs for care and support (whether or not the authority is meeting any of those needs).

Safeguarding and promoting the welfare of children ⁶: This means protecting children from maltreatment; preventing harm to children's health or development; ensuring children grow up with the provision of safe and effective care; and taking action to enable children to have the best outcomes.

Child protection: This is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm. Different types of abuse (e.g. physical, emotional, sexual or neglect) may constitute significant harm. More details about these forms of abuse are outlined in the accompanying procedures for this policy.

Safeguarding allegation: This is where a person has:

- a) Behaved in a way that has harmed a child, may have harmed a child or might lead to a child being harmed;
- b) Possibly committed or is planning to commit a criminal offence against a child or related to a child; or
- c) Behaved towards a child in a way that indicates s/he is or would be unsuitable to work with children.

Appendix 2 Safeguarding Roles and Responsibilities

Board of Trustees

- Hold ultimate responsibility for safeguarding
- Appoint a lead trustee for safeguarding
- Ensure the Safeguarding Policy, Procedures and a Code of Conduct are in place and understood
- Ensure the necessary checks are done on employees and volunteers
- Set out risks and their management of in a risk register which is regularly reviewed

⁴ HM Government (2018) *Working Together to Safeguard Children*

⁵ *Social Services and Well-being (Wales) Act 2014, sec 130(4)*

⁶ HM Government (2018) *Working Together to Safeguard Children*

- Promote a culture and environment whereby employees and volunteers are empowered to raise concerns and feel supported in their safeguarding role
- Carry out proper due diligence when Make-A-Wish UK works with other bodies to achieve its aims
- Comply with the Charity Commission serious incident notification requirements which reporting relevant safeguarding incidents
- Receive and review regular feedback on safeguarding activity, issues and remedial action from the SLT

Chief Executive and Extended Leadership Team (ExLT)

- Take overall responsibility for ensuring that robust Safeguarding Policy and Procedures and a Code of Conduct are in place
- Monitor effectiveness and compliance with the Policy and Procedures
- Take account of safeguarding risks in any new business ventures and activities

Head of People

- Ensure that safer recruitment and vetting policies and procedures are in place for relevant employees and volunteers
- Assist in the management of safeguarding allegations and disciplinaries involving safeguarding matters
- Ensure internal procedures such as disciplinary, complaints and whistleblowing link to the Safeguarding Policy and Procedures and Code of Conduct
- Ensure that there is provision for safeguarding training for employees and volunteers appropriate to their roles and responsibilities

Head of Brand and Communications

- Ensure that any activities done to promote the charity or fundraise in all form of media are conducted in a way to safeguard any children and vulnerable adults involved which includes the taking and use of images
- Provide public relations and communications on the back of any safeguarding incident that might have implications for the organisation

Designated Safeguarding Manager (DSM)

- Take responsibility for the overall implementation of the Safeguarding Policy and Procedures and Code of Conduct and their review
- Provide support and advice to the designated safeguarding officers
- Oversee the management of safeguarding allegations against employees and volunteers
- Brief the board of trustees on safeguarding activity and issues on a regular basis and produces an annual report on safeguarding activity and learning from it
- Chair the safeguarding working group
- Keep abreast of changes in safeguarding law and best practice

This role will be undertaken by Jamie Dormandy, Director of Operations.

Designated Safeguarding Officers (DSOs)

- Provide advice and support on safeguarding matters for employees and volunteers

- Make referrals to police and/or children's social care services when necessary
- Ensure that all partnership arrangements/contracts/projects have the necessary safeguarding requirements and arrangements in place
- Alert the Learning and Development Manager to safeguarding training needs
- Keeps abreast of changes in safeguarding law and best practice
- Undertakes duties delegated by the designated safeguarding manager

The DSO role exists in all our key functions and will be undertaken by the following people:

Wishgranting Team: Kerry Phillips, Tequilla Rich, Emma Buckley

Income & Engagement: Ryan Stanley

Community and Volunteering: Georgina Sowerby, Liz Sheils, Samantha Atterbury, Ellen Ludlow

Safeguarding Working Group

The purpose of this working group will be to:

- provide support for DSOs
- identify training needs
- embed the new safeguarding policies and procedures through implementing a safeguarding action plan
- identify thematic issues in respect of safeguarding
- review the safeguarding policy on at least an annual basis

Appendix 3 Key Safeguarding Legislation and Guidance in the UK

The Care Act, 2014
Sexual Offences Act 2003
Female Genital Mutilation Act 2003
Safeguarding Vulnerable Groups Act 2006
Protection of Freedoms Act 2012
Counter Terrorism and Security Act 2015
Serious Crime Act 2015
Modern Slavery Act 2015
Data Protection Act 2018 and the GDPR 2018

Social Services and Well-being (Wales) Act 2014,
Working Together to Safeguard People, Volume 1
Wales Accord on the Sharing of Personal Information (WASPI) 2013
All Wales Child Protection Procedures 2008 and All Wales Safeguarding Protocols

The Adult Support and Protection (Scotland) Act 2007

Safeguarding Board Northern Ireland Core Policy and Procedures 2018

Appendix 4: Safeguarding Concern Form

Complete as much detail as you are able. Don't delay making a referral if there is information missing.

Raise a Safeguarding concern by using the following form:

[Raise A Safeguarding Concern \(office.com\)](https://www.makeawish.org.uk/safeguarding-concern-form)

If the online form is not available please use the form below and send it to:

safeguarding@makeawish.org.uk or call 01276 40 50 60 for a member of the team to fill it in on your behalf. Further contact details are available in Appendix 6 .

Part 1 Details of the Child/children or Vulnerable Adult		
Name of Child/ren or Vulnerable Adult		
Gender:	Age:	Date of Birth:

Any additional needs (e.g. disability, language spoken, interpreter required)		
Parent's/Carer's name(s):		
Home address of child/ren or Vulnerable Adult		
Place/time/date where the allegation was identified		
Part 2 Details of a safeguarding allegation against employees/volunteers/freelancers/partners/third parties		
Name and role of person who is the subject of the allegation		
Age and/or Date of Birth		
Home address		
Place/time/date where the concern was identified		
Part 3 Your Details:		
Your Name:	Your Position:	Your contact details
Part 4 Report:		

Are you reporting your own concerns or responding to concerns raised by someone else?	
☐ Responding to my own concerns ☐ Responding to concerns raised by someone else	If responding to concerns raised by someone else, please provide their name, role and contact details (if known):

Please provide details of the safeguarding concern or allegation including times, dates or other relevant information. Make it clear whether you are giving a fact, expressing your opinion or expressing the opinion of someone else.
The child or adult's account of what happened (e.g. of any incident, injury, disclosure, behaviour) if known
Please provide details of the person alleged to have caused the incident/injury if known (e.g. names(s) /address/ incident address /relationship to child or adults
Please provide details (name, role contact details if known) of any witnesses to the incident/concerns:

--

Part 5: Actions Taken	
State any risk of immediate harm	
Identify any action taken already e.g. contact with police, manager, children's services, NSPCC helpline etc.	
Is the child and parents/carers or accused person aware that a report has been made	
Any known previous history of safeguarding concerns or allegations	
Any further information or comments or actions to be taken	

Date and time of report being submitted and to whom.....

Part 6: Immediate action and decisions by DSO

Appendix 5 : Safeguarding Concern and Action Log

To protect personal information, only designated Safeguarding Leads and the Designated Safeguarding Manager have access to the Safeguarding Concern and Action Log which includes the following fields:

Id
Start time
Completion time
Email
Name
Language

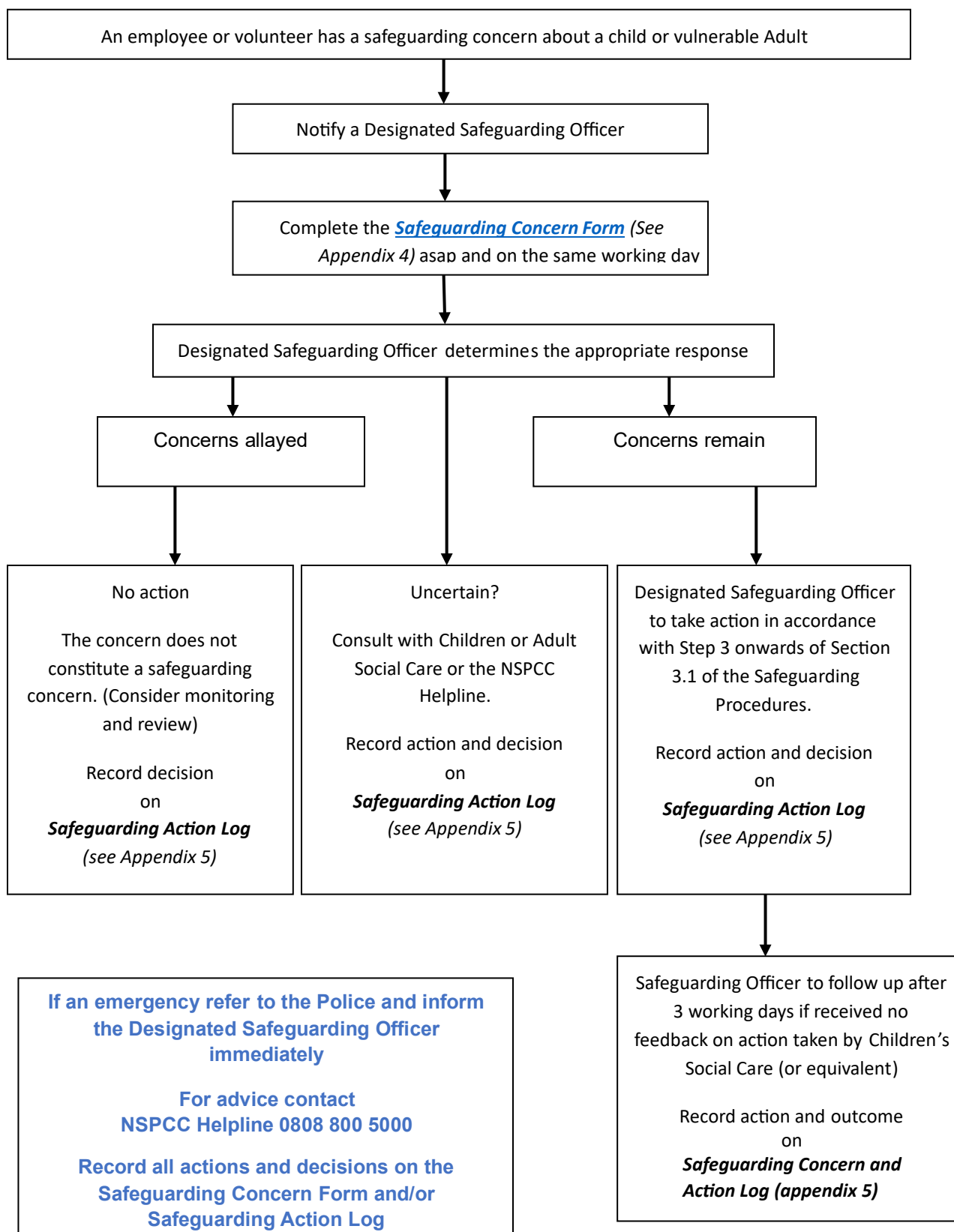
Name of the child or adult who is the subject of the safeguarding concern:
 Gender of the child or adult who is the subject of the safeguarding concern
 What was the outcome of the conversation when the safeguarding concern was reported?
 Did we say if/when we would be back in touch, advise the person to contact any 3rd parties, or commit to doing so
 Has the person who reporting the concern been told that a safeguarding concern will be logged?
 Age
 Date of Birth (if unknown please estimate and highlight that is it approximate)
 Do they have any additional needs (that you are aware of):
 Parent's/Carer's name(s), if relevant / known:
 Home address (for the subject of the safeguarding concern, or their parent/carers):
 Contact phone number (for the subject of the safeguarding concern, or their parent/carers)
 Contact email address (for the subject of the safeguarding concern, or their parent/carers)
 Contact details for the person raising the concern (if different to the subject of the concern) - please give name, phone number, email address.
 Place/time/date where the concern was identified:
 Brief factual description of the concern and/or incident – please record what you have been told without adding any personal opinion or interpretation
 Name and role of the person who is subject to the allegation, and their relationship to the person who is subject of the safeguarding concern.
 Age and/or Date of Birth (estimate if required)
 Contact details for subject of the allegation if known - please give phone number, email address, physical address.
 Are there any Salesforce or other database references to the subject of the concern or allegation (please give references or links below).
 Place/time/date where the concern was identified
 Are you reporting your own concerns or responding to concerns raised by someone else?
 If responding to concerns raised by someone else, please provide their name, role and contact details (if known):
 Assigned DSO
 Assessment - is there a immediate risk?
 Actions Taken
 Next Steps
 Any further information/comments
 Case Status

Appendix 6: Contacts for Safeguarding

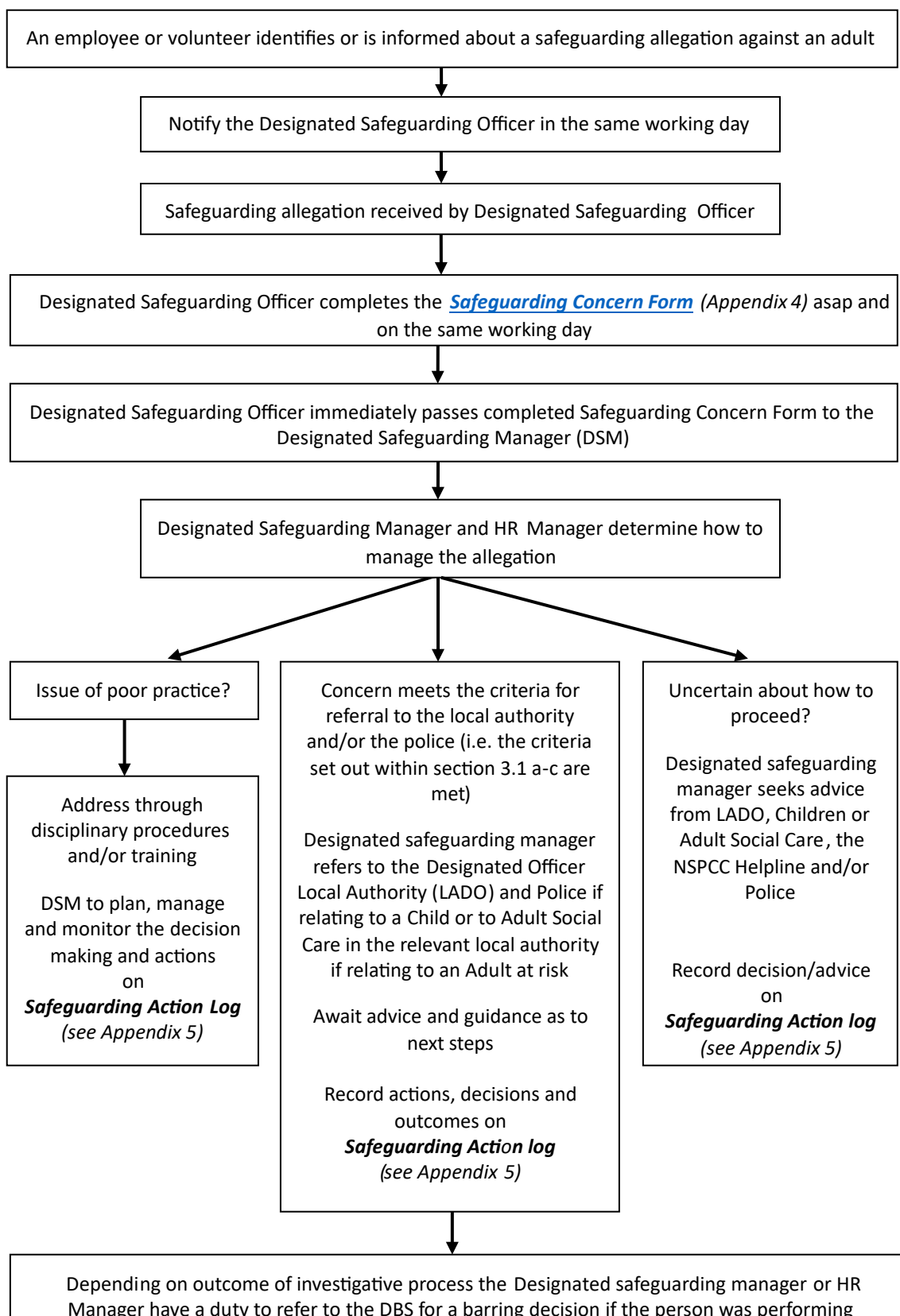
Name and job title	Safeguarding Role	Contact details
Make-A-Wish General Wishgranting Safeguarding inbox	General enquiries Queries specific to a wish Any safeguarding concern or query.	01276 40 50 60 Direct number and emergency number given to wish families. safeguarding@makeawish.org.uk
NSPCC Helpline	24-hour helpline for advice on child protection matters for professionals and adults	0808 800 5000 help@NSPCC.org.uk NSPCC dedicated helplines NSPCC
Childline	24-hour helpline for children and young people	0800 1111
Whistle blowing advice line (external)	Advice can be sought from NSPCC if using the HCT whistleblowing procedure has not resolved a concern satisfactorily	0800 028 0285 help@NSPCC.org.uk Whistleblowing Advice Line NSPCC
The UK Safer Internet Centre	Provides advice for professionals and responds to reports about sexual abuse images of children online	0344 381 4772 Helpline@saferinternet.org.uk Professionals Online Safety Helpline - UK Safer Internet Centre
Child Exploitation and Online Protection Centre(CEOP)	Investigates inappropriate online behaviour such as grooming online or sexual exploitation	0370 496 7622 communication@nca.gov.uk H

		CEOP Safety Centre
Internet Watch Foundation I don't feel that this needs to be on there – you can't report into it, it's just for information	Remove images of child sexual abuse content and criminally obscene content online	01223 203030
Disclosure and Barring Service (DBS)	Advice line for criminal records checks and barring people from working with children or adults at risk	03000 200 190 Disclosure and Barring Service - GOV.UK (www.gov.uk) customerservices@dbb.gov.uk
Local authority Children's Social Care (England)	Use the following website to find out the details: Report child abuse to a local council - GOV.UK (www.gov.uk)	

Appendix 7 : FLOWCHART - What to do if you have safeguarding concerns about a child or adult at risk (Non-Emergency)



Appendix 8 : FLOWCHART – What to do if there are concerns or allegations made about a MAWUK employee, volunteer or adult from a partner affiliate



Appendix 9: Safeguarding Code of Conduct

The Safeguarding Code of Conduct clarifies the behaviour that is expected of everyone within the Make-A-Wish UK which includes all employees and volunteers. The Code will serve to protect

children from harm. It will help everyone from Make-A-Wish UK to maintain appropriate standards of behaviour, reduce the possibility of false allegations of abuse being made against them and preserve our reputation.

Please note there are additional good practice requirements to undertake wish capture safely and appropriately - see the Wish Visitor Handbook for further details.

The Code

DO

- ✓ Always put the welfare of a child first - that is anyone up to the age of 18 years.
- ✓ Report on all suspicions, concerns, allegations or disclosures of abuse made by a child or any inappropriate behaviour by a colleague, including any allegations made against you. Follow our Safeguarding Procedures for this purpose.
- ✓ Demonstrate commitment to ensure safety in all areas of organisation life, acting to safeguard and reduce risk to children.
- ✓ Treat everyone with dignity and respect. All children have a right to equal protection regardless of their race, culture, age, gender, disability, religion, sexuality, sexual orientation or political persuasion.
- ✓ Be friendly and approachable but professional in your interactions.
- ✓ Work openly, avoiding private or unobserved situations and working in isolation. Ensure that you are not the only adult present when working with a child. Leave the door open if you find yourself in a room alone with a child.
- ✓ Physical contact with children can be potentially subject to misinterpretation and therefore avoid physical contact unless it is initiated by a child, in an emergency or it is pre-planned and a necessary part of the work because of the communication needs of the child or young person.
- ✓ Ensure your behaviour and appearance is appropriate to the work or activity that you are undertaking.
- ✓ Allow children to change their clothes with levels of respect and privacy appropriate to their age, gender, culture and circumstances if ever the situation arises during wish granting or fulfilment.
- ✓ Ensure consent is gained for all photographs or films of children - see further guidance in the Use of Images - Film and Photography Policy.
- ✓ Respect the right to personal privacy but never agree to keep any information relating to the harm of a child confidential.
- ✓ Only share their contact details with parents and not children. Do not take the personal contact details of a child.
- ✓ Employees should only share their work, not personal, contact details with parents.

DO NOT

- ✗ Employees and volunteers should not share their personal contact details (personal phone or mobile number, email, home address or social networking links) with the family or child. Where staff also act in a volunteering role they should use their work phone and contact details.
- ✗ Befriend children that you meet through your work or volunteering either face to face or on social networking sites such as Facebook and Twitter.
- ✗ Establish on-line networking, group or blog forums which are not regulated with controls relating to Make-A-Wish governance and scrutiny.
- ✗ Engage in sexually provocative behaviour, use inappropriate or sexually suggestive language or gestures either in person, verbally or via texting/emails.
- ✗ Use any form of physical punishment as a means of discipline.
- ✗ Conduct a sexual relationship with a child or take part in any form of sexual contact with a child regardless of the age of consent. Although a young person can legally consent to a sexual relationship from aged 16, it would be abuse of power if this relationship involved an employee or volunteer with a wish child met through work or volunteering activity
- ✗ Swear or make sarcastic, insensitive, derogatory or discriminatory comments or gestures to or in front of children or young people.
- ✗ Transport a child or young person with whom you are working in your own vehicle unless accompanied by another adult.
- ✗ Rely on your reputation, position or the organisation to protect you.
- ✗ Work under the influence of alcohol or non-prescribed drugs.
- ✗ Smoke or vape in front of children and families.
- ✗ Discuss your own personal/ sexual relationships with children or young people.
- ✗ Give or receive gifts, such as alcohol, cigarettes, drugs or money, from or to a child's family for the purpose of influence or bribery. However, wish visitors may leave a small gift for the child or young person where this has been part of the wish capture activity and may receive small gifts or letters of thanks from the family.
- ✗ Broadcast or share any audio and/or visual material (CDs, DVDs, videos, photos, films, computer, blogs or games etc.) during work hours that has inappropriate or obscene content.
- ✗ Invite, or allow, a child or young person whom you have met through your work or volunteering into your home
- ✗ Arrange to meet a child or young person outside of your work/volunteering role where the purpose is one of friendship or an intimate relationship.
- ✗ Provide any child or young person with support, such as personal care, unless this is a specified part of your job or volunteering role.

What to do if the Code is breached?

If anyone is concerned that an employee or volunteer has breached the Code of Conduct, they should consider first if they feel able to raise the matter with the person concerned but only if this is safe and appropriate to do so and this will depend on the nature of the concern and their role and responsibilities. Otherwise alert the line manager in the first instance. If the concern is about their line manager, then inform the second line manager.

The line manager will need to consider the nature of the breach and the most appropriate action to take. If it's about poor practice, then the line manager should consider using relevant internal procedures such as disciplinary or capability or problem-solving process for volunteers. However, if the breach constitutes a safeguarding allegation, then the procedure in section 6 should be followed.

- If the breach concerns a member of the board of trustees, then inform the chair of the board of trustees.
- If the breach concerns the CEO, then inform the chair of the trustees.

Advice can be sought from the Designated Safeguarding Manager (DSM) or Designated Safeguarding Officers (DSOs) or the People Team.

Consequences of Non-Compliance

Any breaches of this policy where proven, will result in disciplinary action following the organisations disciplinary procedure. The outcome of which could be up to and including summary dismissal for gross misconduct.

Information Classification

Make-A-Wish People policies are classified as 'internal use only' and no part or extract from them or the associated files held on our computer networks may be distributed to any external organisation without the express permission of the People team.

Review and Maintenance

This policy shall be reviewed annually, or after notable change, by the People Team to ensure it remains effective in line with legislation.

Document Control

Issue Type	Safeguarding
Issued:	8 th July 2025
Version:	3
Title	Adult Safeguarding Policy
Policy Owner	Jamie Dormandy Director of Operations
Policy approved by	MAW UK Board
Next Review date	July 2027

Signed:



Chair of MAW UK Board of Trustees