

OVO Foundation

Safeguarding Policy, Procedures and Code of Conduct

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Key points

- We have a responsibility to promote the welfare of all children and vulnerable adults, to keep them safe and to practise in a way that protects them.
- This document sets out the OVO Foundation's commitment to safeguarding from harm those children and vulnerable adults that may come into contact with its staff and employees of the OVO Group during the course of its charitable work, including work with its charitable partners.
- This policy applies to all trustees and staff members (**Staff**) of the Foundation and any employees of the Group who volunteer or take part in charitable events organised by the Foundation involving children and/or vulnerable adults (**Volunteers**).
- Irrespective of professional status, all and any adult who works with children and/or young people will be subject to a DBS check.
- Where Staff and Volunteers take part in an event or project coordinated by one of the Foundation's charitable partners, this policy applies in addition to the relevant partner charity's policies, procedures and guidelines.
- Our safeguarding procedures set out the Foundation's guidance for Staff and Volunteers to follow if they suspect or know of a child or vulnerable adult being abused.
- Our code of conduct is in place to:
 - Reduce the likelihood of children and vulnerable adults coming to harm
 - Protect Staff and Volunteers from allegations of harm or incidents of inappropriate behaviour against children and vulnerable adults
 - Ensure everyone – Staff, Volunteers, children and vulnerable adults – feels safe, respected and valued

Safeguarding Policy

1. Purpose of the Safeguarding Policy

OVO Foundation (the **Foundation**) is the working name of The OVO Charitable Foundation (Company No. 08908420, Charity No. 1155954) and the charitable arm of OVO Energy (the **Group**). OVO Foundation was set up in 2014 with the mission of ensuring all children and young people have equitable access to a sustainable future.

This document sets out the Foundation's commitment to safeguarding from harm those children and vulnerable adults that may come into contact with its staff and employees of the Group during the course of its charitable work, including work with its charitable partners. This policy is supplemented by the OVO Foundation's [Safeguarding Procedures](#) and [Code of Conduct](#), details of which can be found below, and the OVO Foundation's Volunteering Policy.

A separate safeguarding policy and procedures exist for activities and events organised by the Group.

2. Scope of the Safeguarding Policy

This policy applies to all trustees, staff members and contractors (**Staff**) of the Foundation and any employees of the Group who volunteer or take part in charitable events organised by the Foundation involving children and/or vulnerable adults (**Volunteers**).

The Foundation will also work with its charitable partners to ensure adequate safeguarding policies and procedures are in place. While safeguarding is a part of our grant assessment process, the Foundation does not directly advise organisations on effective safeguarding practice, nor do we investigate safeguarding concerns ourselves. Instead we signpost organisations and individuals to appropriate sources of advice.

Where Staff and Volunteers take part in an event or project coordinated by one of the Foundation's charitable partners, this policy applies in addition to the relevant partner charity's policies, procedures and guidelines.

3. Context and Definitions

- a. **Child:** Under the *Children Act 1989* and *2004*, a **child** is legally defined as anyone who has not reached their 18th birthday; a definition that has been fully adopted in England and Wales. Note that in Scotland, when a young person reaches the age of 16 they are legally classified as an adult. However, under the *Children and Young People (Scotland) Act 2014*, they

can still be recognised as a child up to the age of 18 in cases where the child is deemed to be vulnerable or still subject to supervision by the local authorities (criteria outlined in the *Adult Support and Protection (Scotland) Act 2007*).

- b. Vulnerable adult:** A **vulnerable adult** is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support regardless of whether these needs are being met by a local authority.
- c. Safeguarding:** **Safeguarding** means protecting people's health, well-being and rights so that everyone – especially children and vulnerable adults – can live free from abuse, harm and neglect. Safeguarding is covered by legislation and related regulations, including the *Children Acts 1989 and 2004*, the *Children and Social Work Act 2014* and the *Care Act 2014*.

Safeguarding **risks** include: sexual harassment, abuse and exploitation; negligent treatment; physical or emotional abuse; bullying or harassment; commercial exploitation; extremism and radicalisation; forced marriage; child trafficking; female genital mutilation; discrimination on any of the grounds in the *Equality Act 2010*. This list is not exhaustive and 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 a stranger. They may be abused by an adult or adults or another child or children:

- d. Physical abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
- e. Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children frequently to feel frightened or in

danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- f. Sexual abuse:** Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- g. Neglect:** Neglect 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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

4. Safeguarding Policy Statement

We have a responsibility to promote the welfare of all children and vulnerable adults, to keep them safe and to practise in a way that protects them.

We recognise that:

- Everyone has a right to equal protection from all types of harm and abuse; regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation
- The welfare of children and vulnerable adults is paramount in all the work we do and in all the decisions we take
- Some children and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues

We will seek to keep children and vulnerable adults safe by:

- Valuing, listening to and respecting them
- Adopting safeguarding best practice through policy, procedures and a code of conduct for Staff and Volunteers

- Ensuring that Staff and Volunteers are aware of the Foundation's safeguarding policy, procedures and code of conduct by including safeguarding policy and protocol in our induction processes; and supporting them to act accordingly
- Including safeguarding as a key element of our Risk Management Framework
- Mitigating against health and safety risks for children, vulnerable adults, Staff and Volunteers during the course of our charitable work
- Ensuring new partners have sufficient safeguarding practices in place as part of our due diligence process
- Working with charitable partners to undertake safeguarding tasks prior to Staff and Volunteers' involvement, as per the Foundation's [Safeguarding Procedures](#)
- Ensuring charitable partners who deliver projects with funding from the Foundation have safeguarding policies in place, follow the highest level of practice and take all possible steps to safeguard children and vulnerable adults

We aim to review our policy and practices annually.

Safeguarding Procedures

1. Purpose of the Safeguarding Procedures

These procedures set out the Foundation's guidance for Staff and Volunteers to follow if they suspect or know of a child or vulnerable adult being abused.

The procedures are supplemented by the Foundation's Safeguarding Policy and Code of Conduct, which seek to safeguard from harm those children and vulnerable adults that may come into contact with Staff and Volunteers during charitable work organised by the Foundation.

2. Charitable Partners

We ensure that partners have the appropriate safeguarding measures in place through our due diligence process, as well as through a section on safeguarding in the grant agreement.

Where Staff and Volunteers take part in an event or project organised by one of the Foundation's charitable partners, the Foundation's Safeguarding policy applies **in addition to** the relevant partner charity's policies, procedures and guidelines. In that case, the Foundation shall ensure its partner undertakes the following as a condition of their partnership:

- Arrange any necessary DBS or other background checks on Staff and/ or Volunteers
- Provide the Foundation with details of the charity's safeguarding manager (or equivalent position)
- Provide Staff and Volunteers with the charity's policies, guidelines and other information relating to safeguarding of their beneficiaries where relevant
- Provide Staff and Volunteers with appropriate training prior to commencing their work with the charity and on an ongoing basis, as relevant

3. Disclosures

It can be very difficult to speak out about abuse and people often fear negative consequences if they do so. Some may delay telling someone about abuse for a long time, while others never tell anyone, even if they want to.

It's vital that children and vulnerable adults are able to speak out and that Staff and Volunteers take them seriously and act on what they've been told.

A child or adult may disclose to Staff and Volunteers i.e. share information with them verbally, or Staff and Volunteers may see something that concerns them.

Staff and Volunteers should never wait until a child or vulnerable adult tells them directly that they are being abused before taking action, and there may be other indicators that something is wrong. Read more on the potential signs of abuse in NSPCC's guide [here](#).

4. Responding to Disclosures

Staff and Volunteers will be guided by the following principles when communicating with children and vulnerable adults:

- **The welfare of the child or vulnerable adults is paramount.** Ensure that the young person is safe in the immediate space
- **Listen carefully** to what children and vulnerable adults say and take it seriously. Avoid expressing your own views on the matter and avoid displaying shock or disbelief
- **Explain what you'll do next.** If age appropriate, explain you'll need to report the abuse to someone who will be able to help
- **Reassure** them that they've done the right thing in telling you but reassure only as far as is honest, i.e. don't make promises you may not be able to keep, e.g. "everything will be alright now" or "you'll never have to see that person again".
- **Alleviate guilt** if the child refers to it by making sure they know that abuse is never their fault. **Do not promise to keep it a secret**, you have a responsibility to report abuse
- **Do not ask leading questions** such as "did he touch your private parts", instead ask open questions such as "anything else to tell me?"
- **Do not ask the child to repeat the information** for another member of staff
- **Confidentiality is of utmost importance.** Information relevant to the alleged abuse should only be disclosed to the necessary persons, as per the procedures below
- **Take notes** if possible or write-up the conversation as soon as possible, recording the date, time, place, any non-verbal behaviour, and the words used by the child (do not paraphrase)
- **Record statements and observable things** rather than interpretations or assumptions.

5. Reporting Disclosures or Concerns

If a Staff member or Volunteer thinks a child or vulnerable adult is in immediate danger, they should contact the police by calling 999.

If the child or vulnerable adult is not in immediate danger, Staff and Volunteers should take the following steps:

1. Don't delay in reporting

Staff and Volunteers should report the incident, disclosure or observation to the organiser of the project, event or activity involving the child or vulnerable adult – this will normally be the charitable partner. This should happen as soon as possible so details are fresh in your mind and action can be taken quickly.

Staff and Volunteers should also make a written, factual account of the safeguarding incident as soon as possible; detailing date, time, location and a description of the conversation or observation.

2. Inform the Foundation

If a staff member from the Foundation is not present at the event, the Staff member or Volunteer should also report the incident to the Head of OVO Foundation (or Projects and Communications Manager if absent). The Head of OVO Foundation (or Projects and Communications Manager) will be responsible for informing any relevant charitable partners and determining the appropriate course of action, including deciding whether to contact local child protection services or the police.

3. Speak to a trained professional

If the Staff member or Volunteer wishes, NSPCC's trained professionals can be contacted via their phone Helpline on 0808 800 5000 or by emailing help@nspcc.org.uk. The NSPCC can talk Staff and Volunteers through any concerns, give expert advice and take action as appropriate. This may include making a referral to the local authority.

4. Keep the disclosure confidential

Dealing with disclosures can be challenging but please do not disclose the information to others who do not need to know.

5. Work cooperatively with parents

Unless this is inconsistent with ensuring the child's safety

6. Records

The Foundation will securely record any incident, disclosure or observation relevant to the abuse or potential abuse of a child or vulnerable adult, including the date and time of any incident, the time of any disclosure by a child or vulnerable adult and if a referral is made to an outside agency.

7. Managing Allegations and Concerns

Staff and volunteers should feel confident about challenging the behaviour of others and voicing concerns.

Staff and Volunteers can report allegations against, or concerns about, people who work or volunteer with children to the Head of OVO Foundation (or Projects and Communications Manager), who may contact the police or local child protection services. The Group's [Whistleblowing Policy](#) can also be used to report issues where Staff and Volunteers feel it is relevant.

If a Staff member or Volunteer feels unable to report a safeguarding incident within the organisation, they can contact the police or local child protection services, or by contacting NSPCC's Whistleblowing Advice Line on 0800 028 0285 or help@nspcc.org.uk.

8. Photography and Filming

The Foundation uses photos and films to promote its activities and partnerships internally and externally, including in publications, on websites and on social media. The Foundation recognises that, if used inappropriately, photos and films can pose potential safeguarding risks and this may lead to abuse, both online and offline.

The Foundation ensures the following:

- Charitable partners will only share photos or films with the Foundation which have consent in place from the subjects for 1) the photos or filming being taken and 2) for the photos or films potentially being used by the Foundation with clear instruction on whether the photos or films can be used internally and/or externally
- Staff and Volunteers taking part in the Foundation's charitable work are not permitted to use personal devices to take photos or filming of children or vulnerable adults
- There are Foundation devices available for capturing photos and filming at events. Photos and filming taken on these devices may be used by the Foundation or Group, providing the relevant consent is in place
- If we hire a photographer/filmographer for an event organised by the Foundation, we will seek to keep children and vulnerable adults safe by:
 - Providing the photographer with a clear brief about appropriate content and behaviour
 - Ensuring the photographer wears identification at all times
 - Informing children, their parents and carers that a photographer will be at the event
 - Not allowing the photographer to have unsupervised access to children

- Where a photographer is at an event organised by the Foundation, photography and/or filming consent will be shared with the photographer. Participants without consent will be identified. Participants will also be told that photography will be taking place and to speak to a member of staff if they have concerns
- If a participant asks for their photo to be removed from any of the Foundation's promotional material, the Foundation will make arrangements for this to happen as quickly as possible
- The Foundation uses social media including Twitter, Facebook, Instagram and posts content on multiple websites. These accounts are monitored by an OVO member of staff and any inappropriate or concerning comments are reported to the person responsible for social media at OVO, the Head of the OVO Foundation and/or the Projects and Communications Manager and removed, where possible. If safeguarding concerns arise from these mediums, the 'Reporting Disclosures or Concerns' section [above](#) should be followed
- Staff and Volunteers are not to follow or engage online with children and vulnerable adults they know of through the Foundation's charitable work
- The names or any details that would help to identify a child or vulnerable adult (for example which school they attend) would not be used online unless consent is in place. Only images of children and vulnerable adults in suitable clothing will be used to reduce the risk of inappropriate use
- The Foundation will store photos and videos of children and vulnerable adults securely, in accordance with our safeguarding policy and data protection law

9. Training

The Foundation provides its [Code of Conduct](#) to Staff and Volunteers to guide their interactions with children and vulnerable adults and enable them to feel more confident in their safeguarding responsibilities. The document is reviewed at least once a year by the Foundation to ensure it covers safeguarding issues which are relevant to the work of the Foundation.

The Foundation's charitable partners may provide safeguarding training to Volunteers relevant to their particular activities and charitable purposes.

The Foundation may provide additional training to Staff and Volunteers where they believe it would be necessary in accordance with the principles set out in this policy or where it might be helpful for Staff and Volunteers working on specific projects.

Code of conduct

The Foundation recognises that Staff and Volunteers may occasionally work directly with children and vulnerable adults during project visits, activities with the Foundation's charitable partners or events organised by the Foundation involving children or vulnerable adults.

This Code of Conduct is in place to:

- Reduce the likelihood of children and vulnerable adults coming to harm
- Protect Staff and Volunteers from allegations of harm or incidents of inappropriate behaviour against children and vulnerable adults
- Ensure everyone – Staff, Volunteers, children and vulnerable adults – feels safe, respected and valued

Staff and Volunteers shall comply with the following Code of Conduct when interacting with children or vulnerable adults as part of the charitable work of OVO Foundation:

- **Always prioritise the safety and wellbeing of the child and vulnerable adult**
 - If you feel anyone is behaving inappropriately around the child or vulnerable adult, you have a duty to report your concern through the Foundation's [Safeguarding Procedures](#), even if a child or vulnerable adult asks you not to
 - Remember that abuse can be committed peer on peer and all concerns should be reported
 - Respect a person's background, culture and traditions and be mindful of any behaviour that may offend their beliefs
 - Listen to and respect children and vulnerable adults always; don't patronise them
 - Avoid favouritism, and treat children and vulnerable adults fairly and without prejudice or discrimination
 - Do not permit abusive activities amongst and/or directed towards participants (e.g. bullying, ridiculing, name calling, exclusion, racism)
- **Always act within professional boundaries**
 - Avoid physical contact during project visits, activities with the Foundation's charitable partners or events organised by the Foundation involving children or vulnerable adults e.g. hugging. Always be mindful of how your conduct could be perceived

- Avoid one-to-one interactions with participants. If this is unavoidable, keep the interaction as professional and transparent as possible, for example:
 - a) Remain in an open space
 - b) Let somebody else know where you will be working and who with
 - c) Never be alone with a participant in a room with the door shut
- Ensure any contact with participants is essential to the programme / event / activity / project you are working on
- Never give out your personal contact details, and do not 'friend' or 'follow' participants you are working with on social media sites
- Do not use personal devices to take photos of or film children or vulnerable adults
- Do not consume alcohol or drugs when working with children or vulnerable adults
- Do not agree to meet a participant outside of your professional capacity
- Never lose sight of the fact that you are with children and/ or vulnerable adults – behave appropriately and use appropriate language always and challenge inappropriate language used by participants
- Do not accept or give personal gifts to a participant

Anyone found to be in breach of this Code of Conduct will be subject to disciplinary action which may include dismissal or termination of any other arrangement with us. The Foundation reserves the right to report any individual who is suspected of harming a participant to the relevant authorities.