



European  
Network on  
Statelessness

# European Network on Statelessness

## Safeguarding Policy



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# European Network on Statelessness.

## The Context

The European Network on Statelessness (ENS) is a registered Charity in the UK (Registered Charity Number 1158414).

ENS is a civil society alliance of over 170 organisations and individual experts in 41 countries and is committed to ending statelessness and ensuring that everyone living in Europe without a nationality can access the rights they are entitled to under international law.

A London-based Secretariat coordinates the activities of a range of members from large international NGOs to grassroots and community organisations, legal advice agencies, 'thinktanks', stateless activists, and prominent international law experts.

This Safeguarding Policy is intended to provide core guidance for ENS staff, volunteers, and trustees and also seeks to set basic standards and expectations in relation to safeguarding for members and other organisations (Appendix B) working with ENS.

## Policy Statement & Aim

ENS recognises that the welfare of all children, young people, and adults at risk, is paramount and that all have equal rights of protection, regardless of their age, ability, culture, disability, gender assignment, sexual orientation, race, religion, or belief.

The Charity Secretariat and Trustees have a shared responsibility for ensuring that those benefiting from, or working with the Charity, are not harmed in any way through contact with it.

**ENS Staff, Volunteers and Trustees** - ENS primarily engages with adults but aims to attain best safeguarding practice in all its activities including where these might involve children, young people, adults at risk, their parents, carers and/or families. ENS endeavours to always provide a safe and friendly environment and is clear that this policy, guidance and safeguarding risk assessments must be strictly adhered to by all ENS staff, volunteers and trustees. To fail to do so will be considered a disciplinary matter.

**Members** - whenever, and wherever, they are involved in work associated with ENS should ensure they have relevant safeguarding policies and procedures in place in accordance with relevant national/local guidance. Responsibility for ensuring compliance with local safeguarding procedures rests with the relevant member but ENS can provide advice and support where required.

**Consultants, Members who are Project Partners and Consortium Members** - should comply with national/local safeguarding policies and procedures and any relevant safeguarding requirements outlined in the contract or agreement with ENS.

### Why does ENS need a Safeguarding Policy?

All organisations that work or come into contact with children, young people and/or adults at risk need to have safeguarding policies and procedures in place. UK Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall into the remit of this policy.



**ENS is committed to keeping all staff, volunteers, trustees, and everyone who comes into contact with ENS in any way, safe from harm. This is our guiding principle.**

To undertake these responsibilities ENS:

- has trustees and senior managers who are all committed to safeguarding
- is clear about people's responsibilities and accountability
- has a culture of listening to those it works with including children, young people, and adults at risk
- endeavours to follow safer recruitment practices for all staff, volunteers, trustees, and consultants
- has procedures for safeguarding children and young people and adults at risk
- has procedures for dealing with allegations against, and concerns about, any staff, volunteers, trustees, or consultants
- ensures all staff, volunteers, trustees, consultants, and members have access to this policy
- ensures all staff, volunteers and trustees have safeguarding training, supervision, reviews, and support as relevant and proportionate to their job roles
- expects all staff, volunteers, and trustees to consider the above in all their operations in the UK and overseas
- will make safeguarding awareness training available to members and consultants, and provide relevant safeguarding advice and support

Staff, volunteers, trustees, consultants, and members must behave ethically at all times.

## Legal Framework

This policy is developed in line with key UK legislation, government and statutory guidance and applies when and wherever ENS operates. The key principle, **irrespective of the country of operation**, is that safeguarding is everyone's responsibility and each individual and organisation should play their full part and have a child-centred and adult at risk-focused approach.

As a registered charity in the UK, ENS has a legal and ethical duty to meet the requirements of relevant legislation and statutory guidance for [Child](#) and [Adult](#) safeguarding (in England, Wales, Scotland and Northern Ireland), Charity Commission guidance, local [Safeguarding Partnerships and Boards](#) guidance, and local legislation overseas. ENS also expects all staff, volunteers, trustees, consultants, and members to be mindful of this policy when operating outside the UK and work to the highest ethical standards, as expected in the UK and relevant country of operation.

## Data Protection

All staff, volunteers, trustees, and consultants will treat any personal information by which an individual can be identified (i.e., name, address, email etc.) in accordance with the provisions of the Data Protection Act 2018 (DPA 2018), and the General Data Protection Regulation (GDPR) and will not share information with any third party, except where required by law.



ENS Data  
Protection Policy.doc

ENS is mindful of its legal duties under the Data Protection Act 2018 and General Data Protection Regulation (GDPR). Personal information about children, young people, adults at risk and their families will usually be confidential and should not be disclosed to a third party without the consent of the subject. However, the law allows for the disclosure of confidential information where this is necessary to safeguard a child, young person, or adult at risk; or if



a crime has, or may have been committed, or it is in the public interest. Disclosure of confidential information must be justifiable, according to the particular facts of the case and must be limited to those people who need to know in order to take appropriate action.

## Roles & Responsibilities

### ENS Trustee Lead for Safeguarding is:

Name: Jean Lambert

Contact details: [jelambert01@gmail.com](mailto:jelambert01@gmail.com)

Their responsibility is to:

- ✓ take leadership responsibility for the ENS's safeguarding arrangements.
- ✓ ensure safeguarding is a standing item at Trustee meetings
- ✓ keep up to date with the legislative and statutory safeguarding requirements
- ✓ support the ENS's Leadership Team, Lead and Deputy for safeguarding when required

### ENS's Lead and Deputy for Safeguarding

#### Lead for Safeguarding is:

Name: Nina Murray

Job Role: Head of Policy and Research

Contact details: [nina.murray@statelessness.eu](mailto:nina.murray@statelessness.eu)

#### Deputy for Safeguarding is:

Name: Josephine Foster

Job Role: Operations & Partnerships Officer

Contact details: [josephine.foster@statelessness.eu](mailto:josephine.foster@statelessness.eu)

Their role is to oversee and ensure that this safeguarding policy, which includes eSafety, is fully implemented and that ENS meets the highest possible safeguarding standards.

These roles have specific responsibilities in relation to ENS staff, volunteers, trustees, consultants, members with consortium agreements and members with partnership agreements (should a concern relate to an ENS linked activity)

Their responsibilities are:

- ✓ monitoring and recording concerns
- ✓ identifying emerging themes (including the impact of COVID-19)
- ✓ making referrals to social services, or the police, as relevant, without delay
- ✓ liaising with other agencies
- ✓ arranging training for personnel as relevant to job roles
- ✓ reviewing this policy annually or when legislation or statutory guidance changes



ENS's Deputy Lead for Safeguarding should be available to support or cover for the Lead. They will also handle any complaints or allegations against the Lead if appropriate.

## Member Responsibilities

As a civil society alliance with members in 41 countries, ENS is committed to working with all its members to promote and ensure that they understand and comply with their safeguarding obligations in the delivery of their work. Ultimately, however, legal responsibility rests with members themselves, in accordance with the relevant domestic frameworks in their country of operation.

To support members in their Safeguarding responsibilities, ENS will establish that members:

- ✓ Have appropriate safeguarding policies and procedures in place in accordance with local legislation and guidance
- ✓ Understand, and are aware of, ENS safeguarding policy and procedures
- ✓ Where relevant liaise with ENS Safeguarding Lead/Deputy in relation to specific concerns
- ✓ Understand that it is their responsibility to make safeguarding referrals to local social services, or if a crime has, or may have been committed, call the police/local law enforcement without delay
- ✓ Understand they should record all incidents, actions taken and outcomes
- ✓ Operate ethically in all operational environments, both internally and externally

## Media Enquiries

All media enquiries will be handled by Jan Brulc, Head of Communications, Operations & Development.

## Code of Conduct

ENS aims to provide a safe environment free from discrimination, upholding and promoting equality, diversity, and inclusion. All ENS staff, volunteers, trustees (and where relevant, members and consultants) undertake to:

- ✓ comply with this policy at all times
- ✓ treat everyone with respect and dignity
- ✓ ensure that welfare and safety is paramount at all times
- ✓ maintain professional boundaries both face to face and online with at risk groups
- ✓ observe confidentiality at all times including with family and friends
- ✓ always act in a professional way and not accept bullying, swearing or other disruptive behaviour
- ✓ only use physical contact if absolutely necessary in their job role e.g. qualified First Aiders



Complaints  
procedure.docx

When there are concerns about the welfare of any child, young person or adult at risk, all staff, volunteers, and trustees are expected to share those concerns, without delay, with the ENS Lead or Deputy for Safeguarding. Where concerns arise about the conduct of members (whether they are project or consortium partners at the time or not) or consultants engaged in ENS activities, those concerns should be shared according to local policies and procedures in the country of operation, and the ENS Lead for Safeguarding contacted for advice and consideration of further action.



## **Safer Recruitment of Staff, Volunteers, Trustees, Consultants, and Project Partners**

ENS is committed to safer recruitment in line with relevant UK legislation and government guidance. There are currently no posts at the ENS Secretariat in regulated activity (requiring an Enhanced DBS check).

### **When recruiting for staff or consultant vacancies, ENS will:**

- advertise vacancies with a clear commitment required to safeguarding
- assign detailed job descriptions and, when a candidate is selected for interview, sending the relevant criminal declaration form for completion as set out by the Rehabilitation of Offenders Act 1974 and later amendments
- obtain full personal details and take up two references (either written or as a full recorded note of an oral reference provided), one from the most recent employer
- for those working directly with at risk groups, seek two written references to evidence previous work with children, young people or adults at risk (as appropriate/relevant) and undertake interviews face-to-face wherever possible, based on the job description
- ensure at least one person on each interview panel, for roles directly working with children or adults at risk, has undertaken Safer Recruitment training, in line with the relevant safer recruitment guidelines
- have sound procedures and recording for any interview process to ensure that ENS is satisfied, and can evidence, that the applicant is appropriate and suitable
- follow ENS's Policy on the Recruitment of Ex-offenders adhering to the DBS Code of Practice, where relevant

Any appointment will only be confirmed subject to:

- satisfactory ID checks and evidence of the Right to Work in the UK where personnel are not volunteers
- a satisfactory criminal records check (or Certificate of Good Conduct for foreign nationals) at the appropriate level (if required) and a follow up to written references by telephone if relevant to vacant post
- a check of any essential, original qualifications (if required)

### **When recruiting Project or Consortium Partners to deliver project activities, ENS will:**

- advertise detailed contractual opportunities with a clear commitment to safeguarding
- ensure Partners have appropriate safeguarding policies and procedures in place and (where part of any agreement) specify a requirement that they comply with ENS's Safeguarding Policy
- carry out appropriate due diligence checks which can include current and adequate public liability insurance, health and safety risk assessments, safeguarding risk assessments, and/or other relevant checks as appropriate

### **When recruiting Project or Consortium Partners to deliver project activities working directly with at-risk groups (e.g., children), ENS will:**

- advertise detailed contractual opportunities with a clear commitment to safeguarding
- ensure Partners have appropriate safeguarding policies and procedures in place
- carry out appropriate due diligence checks which can include current and adequate public liability insurance, health and safety risk assessments, safeguarding risk assessments, and/or other relevant checks as appropriate
- request all partners date, time, and sign to say they have read, understood, and will comply with the ENS's safeguarding policy and code of conduct at all times





## Safeguarding Induction and Training for ENS Staff, Volunteers, Trustees, and Consultants

ENS has a clear induction policy with clear job descriptions and responsibilities and all relevant procedures. All new ENS staff, volunteers, trustees, and consultants will receive induction safeguarding training as soon as possible and sign to record they have:

- received and understood this policy
- been given any relevant resources
- understood the commitment to safeguarding training

When needed, personnel will receive further safeguarding training, at the appropriate level. For Staff, there is also a probationary period of six months with clear goals and then quarterly supervisions with line managers.

Updated safeguarding training is normally required every two years (online) or three years (face-to-face). Personnel who lead and deputise for safeguarding will also consider undertaking free online government training for [PREVENT/Channel](#) and [FGM](#) as required.

## Recognising Abuse in Children Young People and Adults at Risk

### Definition of a child/young person

The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child “means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier” (Article 1, Convention on the Rights of the Child, 1989). A child in England and Wales is anyone who has not yet reached their 18th birthday (in Scotland a child is anyone who has not reached their 16<sup>th</sup> birthday).

### Definition of an adult at risk (England/Wales)

An adult at risk is a person over the age of 18 years in England and Wales and is:

- having needs for care and support, and;
- experiencing, or is at risk of, abuse and neglect and;
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

### Mental Capacity (England/Wales)

The primary purpose of mental capacity legislation across the UK is to promote and safeguard decision-making within a legal framework. There is a presumption of capacity – every adult has the right to make their own decisions and must be assumed to have capacity to do so unless it is proved otherwise. This means that nobody should assume that someone cannot make a decision for themselves just because they have a particular medical condition or disability. It is a criminal offence for anyone to knowingly ill-treat or wilfully neglect a person who lacks capacity.

### Abuse of a child, young person or adult at risk can take many forms and include:

Alcohol and substance misuse, County Lines, concealed pregnancy, discrimination, domestic abuse, including "honour" based violence, emotional, exploitive use of technology, Female Genital Mutilation (FGM), financial or material abuse, forced marriage, gambling, hate and "mate" crime, misuse of technology, modern slavery, neglect and acts of omission, organisational or institutional, peer abuse including bullying; psychological, physical, racism, radicalisation, self-neglect, sexual abuse, criminal and sexual exploitation, coercive behaviour, abuse related to faith or belief, alcohol and substance misuse, breast ironing, financial or material abuse, gangs, hazing and initiation, trafficking, children going missing, and violent extremism



**Within the context of any operational environment, issues of safeguarding concern might include (this list is not exhaustive):**

Young children reported missing and not being found within a reasonable timescale	An adult at risk being disorientated, getting lost or reported missing
Lone adults loitering near, or covert filming in, toilets or children's areas	Underage or covert drinking by young people
Adults taking pictures or filming children who do not seem to be related to them	Adults giving young people alcohol or drugs
Misuse of drugs or alcohol by under 18s	A parent or carer smacking their child hard
Misuse of drugs or alcohol by parents or carers who should be supervising child/ren or adults at risk	A parent or carer leaving a baby or small child unsupervised outside the bar area
Needles, sharps and /or condoms found in children's and family areas	A young child being found and parents/ carers not being located within a reasonable timescale
A member of personnel or contractor engaging with young people outside their work hours	A member of personnel or contractor engaging with young people on their own personal social media
A member of the public complaining about the bullying behaviour of a family group towards the young people in their care	Groups of young people presenting with anti-social behaviour
Young children locked in a car with no parent/carer appearing to be anywhere near	A toddler who appears to be sunburnt and their parents/carers do not seem concerned

## Handling Disclosures

When a disclosure is made by a child, young person, or adult at risk it is important for all staff, volunteers, trustees, consultants, and members to remember to:

- take what they are being told seriously
- stay calm and reassure
- do not investigate
- do not delay

and always

- seek advice from the relevant Lead or Deputy for Safeguarding
- make a careful recording of anything they are told or observe, date and sign.

A disclosure may come from someone saying they:

- have or are being abused
- have concerns about someone else
- they are themselves abusing or likely to abuse someone else



## Responding to Safeguarding Concerns

ENS ensures all staff, volunteers, trustees, consultants, and project partners operating in the UK understand and know how to share any concerns immediately with the ENS Lead or Deputy for Safeguarding.

### Flowchart for Managing Safeguarding Concerns that Occur in the UK

#### Step One:

**If you are worried a child, young person or adult at risk has been abused because:**

- you have seen something
- someone says they have been abused
- somebody else has told you they are concerned
- there has been an allegation against a colleague
- there has been an anonymous allegation
- an adult has disclosed that they were abused as a child
- a child, young person or adult say they are abusing someone else

#### Step Two:

Talk to the ENS Lead or Deputy for Safeguarding without delay. If they are implicated then report to ENS Trustee Lead for Safeguarding. In an emergency seek medical/police support.

**CONSULT,  
MONITOR  
AND RECORD**  
*Sign/Date/Time*  
*Include name and  
job role*

#### Step Three:

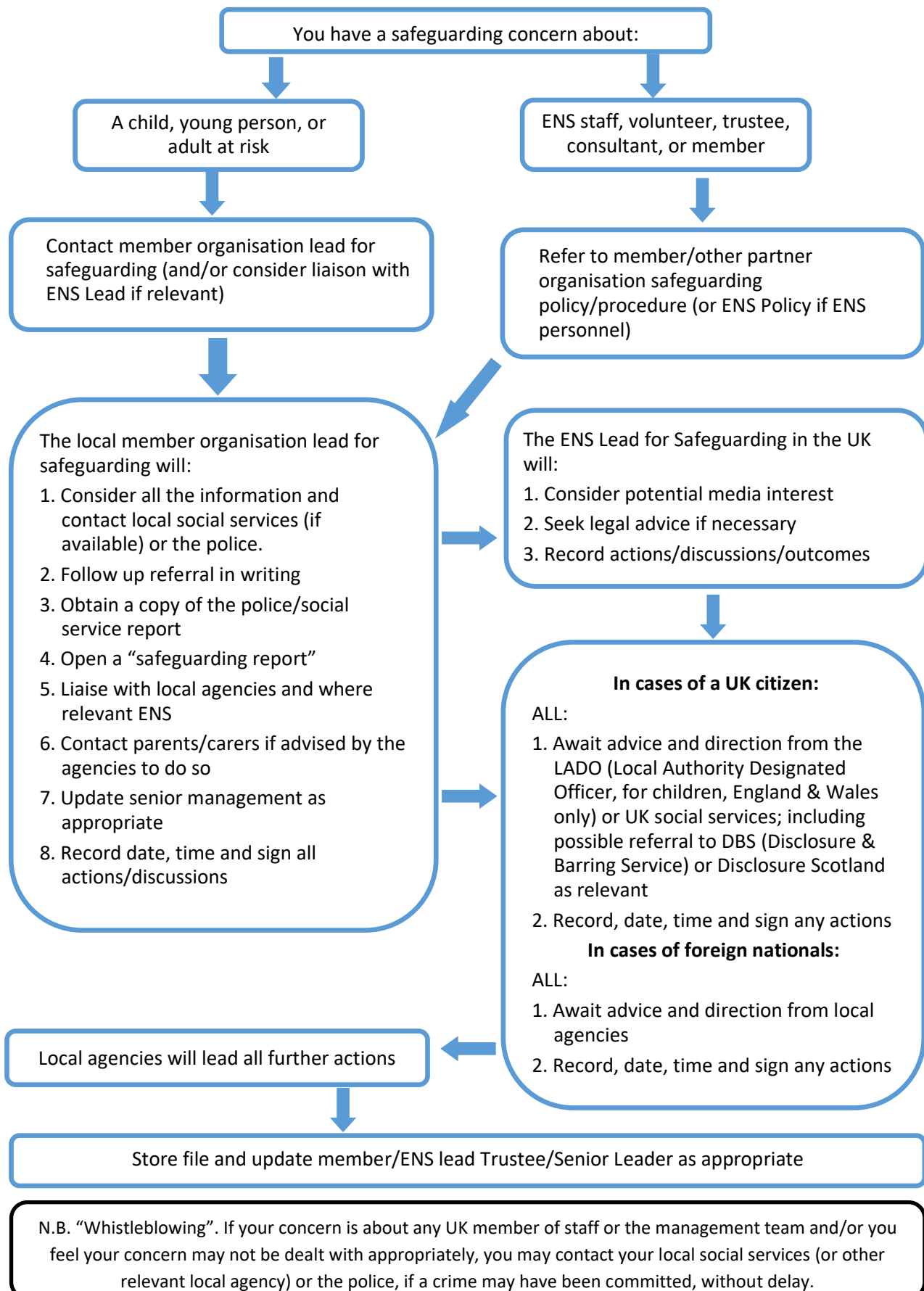
The Lead for Safeguarding should refer the concern to the relevant local adult or children's social care service and/or the Police if a crime has, or may have been, committed and follow up the referral in writing within 24 hours.

**For England & Wales only**, in cases of allegations against a person with a "duty of care", towards a child the Local Authority Designated Officer (LADO) will co-ordinate the next procedural steps. Under "whistleblowing", anyone can refer directly to the police or social care services when they are concerned that ENS is not managing safeguarding concerns appropriately.

**When the concern is about the welfare of a child or adult at risk accompanied by school, college, care staff, you should refer to that organisation's Lead for Safeguarding in the first instance. Inform ENS Lead or Deputy that you have referred a concern.**



## Flowchart for Managing Safeguarding Concerns that Occur Overseas





## Whistleblowing

Whistleblowing is when someone raises a concern externally about a person or practice within an organisation, which will affect others in an illegal and or harmful way. ENS has a Whistleblowing Policy.



Whistle Blowing  
Policy.docx

ENS promotes the sharing of any concerns regarding the safeguarding of children, young people, and adults at risk as soon as possible with the relevant Lead or Deputy for Safeguarding. If individuals who are reporting their concerns within ENS do not feel they have been acted upon then ENS fully supports their right to report these concerns to:

- the Charity Commission
- local social care services, both in the UK and overseas
- the Local Authority Designated Officer (LADO, for child concerns in England and Wales only)
- the local police/law enforcement if a crime has, or may have, been committed

### England:

Charity Commission (England and Wales) [whistleblowing@charitycommission.gov.uk](mailto:whistleblowing@charitycommission.gov.uk)

For those who have concerns about people involved with schools and colleges:

- Office for Standards in Education (Ofsted) 0300 1233155 [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

and for care and health settings:

- the Care Quality Commission (CQC) 03000 616161 [enquiries@cqc.org.uk](mailto:enquiries@cqc.org.uk)

### Wales

For those who have concerns about people involved with schools, colleges:

- Estyn 029 2044 6446 [enquiries@estyn.gov.wales](mailto:enquiries@estyn.gov.wales)

and for care and health settings:

- the Healthcare Inspectorate Wales 0300 062 8163 [hiw@gov.wales](mailto:hiw@gov.wales)

### Scotland

- <https://www.oscr.org.uk/about-charities/raise-a-concern/whistleblowing/>

## Record Keeping

At all times when required, and especially where there is a safeguarding concern, everyone involved must keep records which are:

- recorded on a [safeguarding incident form](#) (appendix A)
- sufficiently detailed about the child, young person or adult at risk to identify individual who is subject of concern and any significant others
- accurate and factual/based on fact, as a true record of:
  - what has been monitored/observed
  - what has been said and by whom
  - what has given cause for concern
  - what action has and/or will be taken including the reason for those actions
  - the reason stated for no action being taken and by whom
- non judgmental
- timely (within 24 hours)
- signed and dated by the recorder and co-signed by the relevant Lead or Deputy for Safeguarding



- shared as appropriate by the Lead or Deputy for Safeguarding
- stored safely and securely by the Lead or Deputy for Safeguarding

All safeguarding records of concern for adults at risk are kept securely for 10 years. In the case of children or young people, these are stored until they are 25 years-old (whichever is the longer). All safeguarding records of personnel allegations, other than those unfounded, will be kept securely for 10 years or until the age of 70, whichever is the sooner.

## Handling Allegations, Dealing with Complaints, and Disciplinary and Grievance Procedures

ENS policies and procedures are in line with statutory guidance, guidelines, disciplinary, complaints and grievance procedures.

A 'Serious Incident' under Charity Commission guidance should be reported to the Charity Commission by the ENS Trustee Lead <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity#how-to-report>

<https://ccforms.charitycommission.gov.uk/report-a-serious-incident>

### ENS Staff, Volunteers, Trustees, Consultants, and Project Partners

Where a complaint or allegation has been made with regards to any inappropriate behaviour or poor practice, the relevant Lead or Deputy for Safeguarding will, in all cases, discuss the situation with social care services (the LADO with regards to children in England & Wales only) and/or the police before making an open decision about the best way forward. In the case of members, ENS will follow the advice of the external agencies at all times.

In cases where the ENS Lead is implicated, the ENS Safeguarding Trustee Lead should be informed. In the exceptional circumstances that both are involved, the person concerned will involve local safeguarding statutory partners. If there is a belief that the concern has not been taken seriously or acted upon then anyone can "Whistleblow". With regards to disciplinary and grievance procedures, no steps will be taken until the matter has been fully discussed and a strategy agreed with local social care services, LADO, and/or the police (as appropriate). Any investigation will override the need to implement any such procedures. The Board of Trustees is responsible for making referrals to the relevant:

- Appropriate criminal records service in the UK
- Regulatory Authority including the Charity Commission, if any
- Professional regulatory body

### Bullying and Harassment



Bullying and  
Harassment Policy.d



Grievance  
Procedure.docx

ENS will:

- provide a culture of equality and respect for all with zero tolerance to any form of bullying or harassment
- report all incidents of bullying or harassment observed or disclosed, to the Lead or Deputy Lead for Safeguarding



- take immediate steps to stop the behaviour and mitigate the effects of bullying and harassment
- record all incidents with observations and witness statements, and action taken, signed, timed and dated

## Social Media and eSafety

Government guidance is clear that all organisations working with children, young people, adults at risk, families, parents and carers have eSafety responsibilities. It is also important to remember, children, young people, and adults at risk can also abuse and such incidents fall into the remit of this policy.

### eSafety Code of Conduct:

ENS expects all staff, volunteers, trustees and consultants to agree and sign up to the eSafety code of conduct to:

1. use the internet and other forms of communication in a sensible and polite way.
2. only access websites, send messages or access and use other resources that will not hurt or upset anybody.
3. seek permission if they want to use personal information or take photographs of other people.
4. report any concerns to the relevant Lead or Deputies
5. be clear that confidentiality cannot be maintained if there is a concern about the welfare of a child, young person or adult at risk

### What are the Risks?

There are many potential risks including:

- accessing inappropriate or illegal websites
- receiving unwanted or upsetting texts, e-mail messages or images
- being “groomed” by another with a view to meeting the child, young person, or adult at risk for their own illegal purposes including sex, drugs, or crime
- viewing or receiving socially unacceptable material such as inciting hatred or violence
- sending bullying messages or posting malicious details about others
- ignoring copyright law by downloading e.g., music, videos, homework cheat materials etc
- overspending on shopping and gambling sites
- being at risk of identity fraud for money transactions
- inappropriate relationships or prostitution

### What else might be of concern?

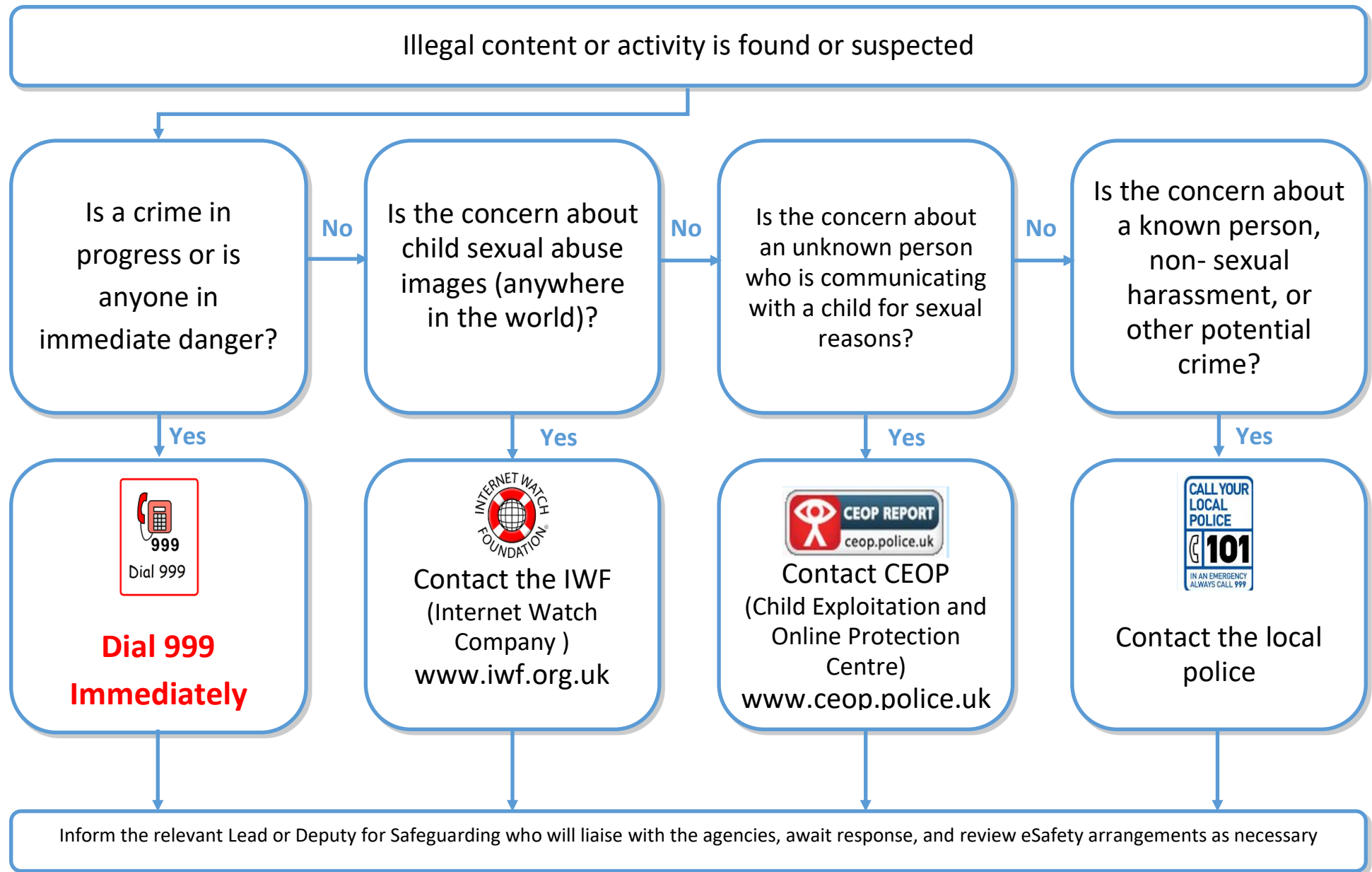
#### A child, young person, or adult at risk who:

- is becoming secretive about where they are going to or who they are meeting
- will not let you see what they are accessing online
- is using a webcam in a closed area, away from other people
- is accessing the web or using a mobile for long periods and at all hours
- clears the computer history every time they use it
- receives unexpected money or gifts from people you don't know
- does not appear to have the money they should have

#### A person who:

- befriends a child, young person, or adult at risk on the internet or by text messaging
- has links to children, young people and/or adults at risk on their social media pages especially if they work in a position of care such as a sports coach or care worker
- is secretive about what they are doing and who they are meeting

eSafety Referral Flowchart





# Working Practices

## Venues

Safeguarding risk assessments will be carried out and reviewed annually of all venues used by ENS or by the host's venue management, such as schools. However, it is the responsibility of everyone to draw management attention to practices and procedures that they are unhappy or uncomfortable with.

The safeguarding risk assessments should cover monitoring and supervising:

- access, especially how people enter and leave the venue
- signing in protocol
- use of keys
- toilets and changing rooms
- any outside space
- car parks
- photography, filming, social media
- any other relevant issues

## Project Partners and Consultants

All project partners and consultants are expected to undertake risk assessments for all activities and services delivered under agreements with ENS. ENS expects them to:

- ensure that those who run activities have the expertise, knowledge, and skills to do so properly
- complete a risk assessment which involves identifying risks and the means of reducing or eliminating those risks for all activities or events
- risk assess any changes being made to activities or events involving
- have a written plan in place if event or activity has to be cancelled
- have a written plan in place in case of emergency including contact numbers
- implement the required actions identified by the risk assessment process and review the effectiveness of these on a regular basis

## Photography, Filming & Social Media Guidance

- Public crowd photography will not be taken unless there is prominent signage by the entrance to any event and at the location where filming is taking place, detailing the purpose of such imagery, and giving people the option to opt out.
- No official or commercial photography or video will be taken specifically of individual children, young people, or adults at risk without advising the subjects, parents, or carers of the purposes of such images and, for images of individuals, seeking written signed consent with the from the responsible parent (for children under 13).
- In the case of any individual adult who lacks capacity, it is the decision of the accompanying carer to agree if any filming can take place as they have already been entrusted to look after the adult at the time.
- When children, or adults who lack capacity, are attending with a member organisation or community group, it is that organisation's responsibility to seek permission and inform ENS personnel if there are any concerns or issues.
- If in exceptional circumstances ENS personnel use their personal devices, phones or cameras which have to be used to take any photographs or videos of children, young people or adults at risk, all images should be saved to the ENS network, and all copies deleted from the device. Any unused images taken specifically of individual or small groups of children, young people, or members of the public, due to lack of quality etc., are deleted.

- A record will be maintained of any official press and other photographers who may be contracted by ENS or members/project partners.
- No pictures of children, young people, or adults at risk will be published in any medium in a way that their names can be identified.
- No images of children in a state of undress will be taken.

Images will be kept for a maximum of five years in line with ENS Data Protection Policy.

## Ethical Fundraising

ENS accepts grants and donations and encourages individuals to contribute to the Charity. ENS is committed to all its fundraising being:

- **Legal:** All fundraising must meet the requirements of the law.
- **Open:** Fundraisers must be open with the public about their processes and must be willing to explain (where appropriate) if they are asked for more information.
- **Honest:** Fundraisers must act with integrity and must not mislead the public about the cause they are fundraising for or the way a donation will be used.
- **Respectful:** Fundraisers must demonstrate respect whenever they have contact with any member of the public.

## Policy Date

This policy was agreed by the Board of Trustees in September 2021 and disseminated and will be reviewed annually or when there are substantial organisational changes.

**Policy Review Date:** June 2024

**Next Review Date:** June 2025

### Lead for Safeguarding:

**Name:** Nina Murray

**Signature:**

**Date:**

### Deputy for Safeguarding:

**Name:** Josephine Foster

**Signature:**

**Date:**

### Trustee for Safeguarding

**Name:** Jean Lambert

**Signature:**

**Date:**



## Appendix A

### Safeguarding Incident Form

*This form should only be filled in with information **already** known by the concerned person and the relevant Lead and Deputy who has managed the referral. Be careful not to ask leading questions and be clear about what is fact and what is opinion in your recording.*

<b>Name of child or adult at risk (including any names known)</b>	
<b>Date of Birth</b>	
<b>Address</b>	
<b>Name of parent or carer and contact details</b>	
<b>Any special needs known; including medical, disability, language etc.</b>	
<b>Nature of concern:</b>	
<b>Name and details of any other children or adults at risk in the family</b>	
<b>Name and details of any other significant adults in family</b>	
<b>Action taken</b>	<b>Detail here agency contacted, who spoken to and any timescales/actions given</b>



<b>Lead/Deputy</b> Record the action taken and the reason for taking it OR Why no action has been taken at this time	<b>Time &amp; Date</b>
<b>Name, job role, location &amp; signature of the concerned person</b>	<b>Time &amp; Date</b>
<b>Name, job role, location &amp; signature of <i>Lead/Deputy</i></b>	<b>Time &amp; Date</b>
<b>Name of organisation, address and phone numbers/e-mails for the contacts above:</b>	



## Appendix B

### Organisations and individuals working with and/or supported by ENS

- **Consultants** – Consultants can be a member of ENS or not, they are commissioned to deliver project activities under specific projects or are contracted as freelancers to work with the ENS Secretariat on specific projects e.g. commissioned to carry out research or to develop an advocacy or comms strategy or facilitate community engagement activities.
- **Members** – individuals or organisations that have been accepted by the Board to be associate members of ENS and to therefore benefit from sharing knowledge and expertise (between ENS and the member, and between the members themselves), gaining access to events, capacity building and funding opportunities.
- **Members with Partnership Agreements (PAs)** – as ‘Members’, but ENS have a signed partnership agreement with the Member where ENS agrees to provide small amounts of funding for them to work on projects related to statelessness. PAs can be funded by various sources, but this doesn’t change the safeguarding requirements. See wording on safeguarding in agreements.
- **Consortium members** – A consortium agreement with a member of ENS working on a specific project. ENS are the lead partners and oversee the project, channelling the funding from OSF to consortium members. See wording on safeguarding in these agreements.