

BROOKE GLOBAL SAFEGUARDING POLICY 2022

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Annex 1 definitions, acronyms and glossary must be read alongside this policy.

GLOBAL SAFEGUARDING POLICY

Executive Summary: The Policy sets out Brooke’s commitment to a global zero tolerance safeguarding culture across staff, trustees, volunteers, consultants, donors, partners, professional representatives and the communities we work in including children, young people and vulnerable adults.

Associated documents:

1. **Disclosure of Malpractice at Brooke Procedure**
2. **Code of Conduct**
3. **Guide to Brooke Reporting Tool**

Reporting Tool found at <https://thebrooke.whistleblownetwork.net/frontpage>

4. **Safeguarding Investigation Process**

Approved by: Board of Trustees December 2019



Responsible Officer:	Global Safeguarding Officer
Policy Contact:	Head of HR
Geographical scope:	Global
Frequency of Review:	Annual
Next review/update:	June 2022 for Board approval / Next Review June 2023
Applies to:	See Section 5

1. INTRODUCTION

Brooke is an animal welfare charity that protects and improves the lives of the working horses, donkeys and mules that give people in the developing world the opportunity to work their way out of poverty. Around 600 million people rely on these animals to put food on their tables, send their children to school and build better futures for themselves and their families. Brooke works in more than 15 developing countries, with animal owners, communities, service providers, animal health systems, governments and international organisations to make long-lasting improvements to the lives of animals and their owners.

This Global Safeguarding Policy provides clear definitions, sets standards and principles across the organisation, and gives clear guidance on how to apply and implement the policy throughout Brooke and in relation to partner organisations.

2. WHAT IS SAFEGUARDING

Safeguarding in its broad sense means protecting people from unintended harm caused by sexual exploitation, abuse and harassment. The aim is to minimise the likelihood and impact of these actions towards people by their contact with Brooke.

This policy focuses on addressing those risks by developing standards and mitigating measures to target and reduce residual risk.

3. PURPOSE & COMMITMENT

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm, abuse or exploitation that may be caused due to them coming into contact with Brooke or in the course of the Charity's work. This includes:-



- The conduct of staff or representatives of Brooke.
- The design and implementation of Brooke's programmes and activities.

The policy lays out the commitments made by Brooke and informs staff and associated representatives of their responsibilities in relation to safeguarding. This policy also covers sexual harassment in the workplace and runs alongside Brooke's Anti-Harassment and Bullying policies.

This policy does not cover safeguarding concerns in the wider community not perpetrated by Brooke or associated representatives.

Where work takes place in a place where legislation provides for the protection of adults and children we must be compliant under English law. **Branches** and **affiliates** may be subject to other relevant legislation in the jurisdictions in which they operate. Brooke's policy applies the higher standard of UK and local law in the country of operation.

4. POLICY STATEMENT

Brooke has a global zero tolerance for any staff or Brooke representative committing harm from sexual exploitation, abuse and harassment and takes a robust approach to any accusations or concerns when dealing with safeguarding issues. Our policies and procedures are designed to support survivors in coming forward to report harm. We understand the courage required in reporting incidents and concerns. We treat all reporting confidentially, Safeguarding Focal Points are trained to encourage sensitive reporting and we provide support and assistance to individuals who come forward. Brooke strives to comply with the laws, rules and regulations by which it is governed and with recognised compliance practices. All those in scope must comply and read the Policy in conjunction with the relevant procedures. Failure to do so may subject the Charity and staff to serious civil and/or criminal liability. In addition, failure to comply with the Policy may result in sanctions, including suspension or termination of employment or other relationships.

As part of our commitment to best safeguarding practice, Brooke operates a policy of '*presumption of truth*' when receiving reports of incidents or concerns. This means we will **always** treat every report seriously and investigate further where necessary.

Staff and representatives have a responsibility to report through the correct channels any concerns that they become aware of. It is the responsibility of Brooke to determine if a safeguarding incident has occurred or to investigate it.

- **Principles of safeguarding**

Brooke is committed to applying the following FCDO (formerly DFID) principles in relation to safeguarding. Since early 2018, the FCDO has been focused on safeguarding against

Sexual Exploitation and Abuse and Sexual Harassment (SEAH) in the international aid sector.

- Everyone has responsibility for safeguarding.
- Do no harm.
- Brooke has a duty of care to all those who come into contact with the charity. This includes children and vulnerable adults in the community who may be exposed to abuse.
- Act with integrity, be transparent and accountable.
- All activity is done in the best interests of the child/vulnerable adult.
- A child is defined as someone under the age of 18 regardless of the age of consent in country.
- All children shall be treated equally, irrespective of race, gender, religion/or none, sexual orientation or disability.
- Organisations that work with children and vulnerable adults should apply a safeguarding lens to their promotional communications and fundraising activities and to their programme design.

5. TARGET GROUPS OF THE POLICY – IN SCOPE

The Global Safeguarding Policy is to be applied across all organisational activities and in all of Brooke programme themes, including but not limited to: animal health, welfare, community development, external affairs and research. All Brooke representatives should be aware of and adhere to the policy.

In addition to complying with the policy, all representatives must adhere to Brooke's Global Code of Conduct applied across all funded operations with additional annual updates, reminders or refresher training to ensure compliance. Consultants and other representatives put into contact with communities by Brooke should also adhere to the Code of Conduct.

Partner organisations, defined as organisations that receive grants from the Brooke UK, should have policies and procedures in place covering safeguarding in order for Brooke to enter into partnership. We will require this assurance through our due diligence process. This will not always be the case at the outset of a partnership, particularly with grassroots civil society partners. Where partners do not have appropriate policies [and supporting procedures, processes], but it is deemed essential that Brooke work with them, policies will either be developed or Brooke's Global Safeguarding Policy adopted before issuing a grant agreement.

Brooke will strive to ensure this policy is implemented with independent, external agencies, such as partner organisations that we fund. We can choose not to work with partners, put specific conditions into partnership agreements, or end partnerships based on partners' policies and their implementation of these, including Safeguarding.

Those in scope of the policy include:-

- All staff including **branch and affiliate** staff and trustees contracted by Brooke.
- Brooke representatives whilst engaged with work or visits related to Brooke, including but not limited to the following: consultants, contractors, volunteers, interns, agency workers, donors, supporters, programme visitors including journalists, celebrities and politicians, professional representatives. The Policy and its related documents may also refer to individual members of Staff.
- Partners either under this policy or under their own equivalent policies.

6. CONFIDENTIALITY

It is essential that confidentiality is maintained internally at all stages of the process when dealing with safeguarding concerns or investigations. Information relating to the concern and subsequent case management should be shared on a need to know basis only and should be kept secure at all times. Any safeguarding reports and information herein will be handled with strictest confidentiality to protect the identity of the individuals concerned, the informer and the accused, both appropriately and in accordance with relevant UK or other national and local legislation.

7. DATA PROTECTION

The Brooke processes personal data collected during any safeguarding concern and/or investigation in accordance with its Data Protection Policy. This information will be held in accordance with Brooke UK's Retention and Destruction Policy. All data collected will be held securely and accessed by and disclosed to individuals only for the purposes of complying with the Global Safeguarding Policy. Inappropriate access or disclosure of personal data constitutes a data breach and will be reported in accordance with the Brooke's Data Protection Policy immediately. It may also constitute a disciplinary offence, which will be dealt with under Brooke's disciplinary procedure.

8. PREVENTION & MEASURES TO IMPLEMENT POLICY

The Global Safeguarding policy requires the following steps for its implementation.

Staffing including the designation and training of a **Global Safeguarding Officer (GSO)**, as well as **Safeguarding Focal Points (SFP)** in each country office.

Prevention measures including awareness raising, training of relevant staff, risk analysis, recruitment procedures, induction of staff in the policy and Codes of Conduct for Brooke staff and representatives and incorporation of the policy into relevant existing policies and systems.



Brooke will:

- Ensure all staff and Brooke representatives have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Brooke. This includes the way in which information about individuals in our programmes is gathered, stored, accessed and communicated.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated representatives.
- Ensure staff, SFP's and trustees receive training on safeguarding at a level commensurate with their role in the organisation as well as refresher training. Additional training for SFP's will include face to face training in how to provide help and support in such a way as to ensure that those coming forward with reports are not harmed from doing so.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Where individuals disclose a safeguarding incident but ask there is no investigation, this will be referred to the Global Safeguarding Officer. However any safeguarding incidents would have to be investigated once disclosed to Brooke.

Reporting and responding measures including steps for alerting and reporting safeguarding concerns, investigation and incident management, duties and responsibilities of assigned investigation managers and Safeguarding Focal Points.

Implementing and maintaining the policy, including training and capacity building of staff and partners, monitoring, reporting and annual review of the policy and procedures.

8.1 Staffing

Global Safeguarding Officer (GSO)

The role of GSO is the most senior Safeguarding role across global Brooke and is fulfilled by a UK based Director to oversee and offer guidance on safeguarding cases and the investigation overall to ensure transparent and good operational governance around the case.

Local Safeguarding Focal Point (SFP). Brooke has designated a Global Safeguarding Officer at international HQ level and Safeguarding Focal Points across all Brooke named offices branches and affiliates - to cover their country of operation. These responsibilities are set out in a SFP Terms of Reference. The selection of the Safeguarding Focal Points will be undertaken in discussion between the Country Director, HR and the Global Safeguarding Officer and are recruited internally from the existing team and trained by external Safeguarding specialists. Brooke will not allocate this role to a non-staff member.



The contact details of the local Safeguarding Focal Point (SPF) must be included on all country information documentation provided to visitors and representatives of Brooke to the country.

Brooke will ensure sufficient time is given to the GSO and SFP's to acquire the necessary skills and knowledge and to undertake the above activities. Line managers will recognise the priority of SFP roles in incident reporting and response when an incident occurs and the dual reporting line required for this area of work.

In addition, each country office will have a designated safeguarding team (consisting of the Country Director, the SFP and an additional senior manager where available).

Safeguarding refresher training of SFPs and Country teams taking a survivor centred approach will be an annual event (to be undertaken again in 2022/2023 plan) and run by a mixture of internal and external trainers. This will form part of each country programmes' annual risk register.

8.1 Statutory Reporting Officer (SRO)

Brooke has designated a SRO. This role is responsible for reporting to external authorities such as the Charity Commission in the UK. Reporting to law enforcement both in the UK and overseas is covered in 8.5.

8.2 Other roles and responsibilities

Brooke will ensure all staff have access to, are familiar with, and know their *responsibilities within this policy*.

Staff are required to complete relevant training on safeguarding and keep up to date about any changes and complying with this policy and relevant procedures. Brooke is responsible for ensuring all staff are appropriately trained in safeguarding and aware of their obligations at all times.

The Brooke UK CEO delegated by Brooke UK Trustees holds ultimate responsibility for determining whether the Policy has been implemented in relation to overseas programmes. They may delegate the operational aspects of this function to the Global Safeguarding Officer and/or local Safeguarding Focal Points in country. The Global Safeguarding Officer is responsible for reporting incidents internally and the SRO externally to the relevant UK regulatory authorities. The nominated Board UK Safeguarding Trustee must be kept abreast at all times of reported incidents. The Governance Committee of the Board receives a confidential case file report in each of its meetings.

The UK Legal team advises in cases where the likelihood of a claim has been identified. The UK HR department provides advice and guidance in relation to claims of failure to safeguard in accordance with the policy/procedures.

8.3 Staff responsibilities

Child safeguarding

Brooke staff and associated representatives must not:

- Engage in sexual activity with anyone under the age of 18.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional, psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.

Adult safeguarding

Brooke staff and associated representatives must not:

- Sexually abuse or exploit at risk adults.
- Subject an at risk adult to physical, emotional, psychological abuse, or neglect.

Protection from sexual exploitation and abuse

Brooke staff and associated representatives must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, Brooke staff and associated representatives are obliged to:

Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.

- Report any concerns or suspicions regarding safeguarding violations by a Brooke staff member or associated representative immediately. Where appropriate, reporting through our reporting tool, email or face to face will be to the Country Director, Safeguarding Focal Point in country and HR representative who will inform the Global Safeguarding Officer immediately. The Global Safeguarding Officer will ensure that the matter is appropriately investigated. Brooke reporting mechanisms are noted in the section 8.5 under reporting of incidents.

8.4 Prevention

Staff recruitment

All recruitment of staff will include a full induction to the Global Safeguarding Policy and Code of Conduct, including procedures to follow should any safeguarding concern arise. When recruiting staff, Brooke will make sure that questions regarding safeguarding are included in any relevant job interviews, and that any roles with safeguarding responsibilities have those responsibilities explicitly outlined within the job description. Two references will be sought from previous employers, including the most recent employer, to get more information of the suitability of candidates. References will be on letter headed paper and be from the relevant line manager or HR. All Reference requests sent from Brooke UK include a specific safeguarding question concerning safeguarding risk.

All Brooke representatives will be required to acknowledge receipt of and compliance to the Global Safeguarding Policy and sign up to the Code of Conduct prior to their employment or engagement.

Awareness

Brooke will designate staff with the responsibility of building internal awareness and supporting relevant capacity development of the organisation in safeguarding as detailed in 8.0 of this policy. All Brooke branches, affiliates and partner organisations will be duly notified of the Global Safeguarding Policy and be made aware of how they will be expected to comply with it. The policy will be translated into the appropriate national languages where Brooke operate. It will be the responsibility of all Brooke staff to share the policy and approach as relevant to external stakeholders. It will also be publically accessible on our website.

Brooke will provide or facilitate necessary training and support to global and country staff and partner organisations to enhance understanding and ensure effective implementation of the policy.

Brooke branches and affiliates will be produce a local plan/integrate into existing plans to ensure the requirements of the policy are implemented in their context and jurisdiction. Implementation processes may therefore differ from country to country, but in all circumstances, the Global Safeguarding Policy, Malpractice in the Workplace and Code of Conduct will remain the same across all countries of operation. Each country will develop a policy schedule, including naming the Safeguarding Focal Points and country safeguarding team.

Brooke will ensure all supporters, donors, sponsors, professional and media representatives involved with Brooke work have access to the Global Safeguarding Policy, Malpractice in the Workplace and Code of Conduct.

Risk analysis

Brooke will design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with Brooke. This includes the way in which information about individuals in our programmes is gathered and communicated.

When working with partners, Brooke will endeavour to ensure that the programmes it supports are safe for the adults and children they serve through the due diligence process which should include a risk analysis.

Such risk analysis will be an integral part of project proposals, programme planning guidelines and partnership assessment tools. As part of Brooke's risk assessment process, safeguarding risks and mitigations are captured and reported biannually to the Board. In addition, quarterly Country Declaration returns will be forwarded to Finance from all country representatives confirming compliance to Brooke corporate policies including safeguarding.

Code of Conduct

All Brooke staff and representatives are required to understand their responsibility to keeping people that come into contact with its work, including adults at risk and children safe, and adhere to the Brooke Code of Conduct ([hyperlink](#)) which lists acceptable and unacceptable behaviour, primarily designed to safeguard others. All staff are responsible for encouraging and promoting the implementation of the Code of Conduct.

The adherence to this code is mandatory for all Brooke representatives. Any violation of the Code of Conduct for Brooke staff may result in disciplinary procedures in addition to any relevant [legal action](#). To give maximum protection to beneficiaries, the organisation and staff, the Code of Conduct is to be applied both within and outside of working hours.

8.5 Reporting and responding to incidents

- Brooke will ensure that reporting and incident management procedures to handle safeguarding concerns are in place and effectively used to enable an appropriate and swift investigation of any given case. Brooke encourages external sources such as members of the public and communities where we work, partners, agencies/third parties and official bodies to raise any concerns they have using Brooke's reporting systems.

Specifically:-

- Brooke will ensure that safe, appropriate, accessible means of reporting safeguarding concerns, including anonymously, are made available to staff, representatives and the communities we work with.
- Brooke will follow up reports of safeguarding concerns promptly and according to due process.
- Brooke staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Brooke's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.
- Reporting can be done;
 - Via the Brooke Global Safeguarding Reporting Tool at <https://thebrooke.whistleblownetwork.net/frontpage>. Our reporting tool will accept safeguarding concerns anonymously if the person wishes to withhold their name and contact details.
 - **Face to face** with a trained Safeguarding Focal Point and captured on the Global SG Reporting Tool.
 - **Via email to Country Safeguarding Focal Point (SFP)**
 - **To the Global Safeguarding Officer(GSO)**
- Brooke representatives should be properly informed of the reporting and incident management procedures. Any Brooke representative who has a concern or suspicion regarding harm, exploitation or abuse by someone representing Brooke must report such concerns through to the Brooke Global SG Reporting Tool or the designated Safeguarding Focal Points in country or GSO.
- Brooke will offer support to survivors of any abuse by explaining the process and outcomes of any investigations and/or further action, maintaining confidentiality throughout the process and providing access to welfare support where applicable either through the SFP's or third parties.
- Brooke will provide psychological support to survivors and will endeavour to not cause distress from their participation in the investigation process
- Brooke will aim to source trusted local organisations who people can be referred to and to give support to survivors on the ground.
- Brooke will determine if there is sufficient evidence available to invoke a disciplinary or other relevant processes.

Brooke countries in consultation with the Global Safeguarding Officer will inform relevant law enforcement taking into consideration Brooke's duty of care responsibilities and the safety and security of victims and survivors. This will ensure consistent risk judgement on informing law enforcement alongside duty of care **across** the organisation. That decision should be informed by the views of the Country Director as well as policy, with the CEO as ultimate arbiter.

Brooke will take forward and investigate all safeguarding reports unless there is a strong reason not to (for example if it would put someone at greater risk). If an individual has specific concerns over a report being taken forward, Brooke will seek to address those concerns.



Procedures to be followed in the case of an incident

Use of Brooke reporting tool <https://thebrooke.whistleblownetwork.net/frontpage>
Use of Brooke Investigation Process

Consequences of harm, exploitation or abuse

Any behaviour towards children or adults, which results in harm, exploitation or abuse, or the failure to follow the general requirements of this policy and Brookes code of conduct, is grounds for the following measures:-

Staff (Branches and Affiliates) an employee has been under investigation by Brooke or by official law enforcement authorities for any area of harm, exploitation or abuse as defined under this policy may be subject to employee disciplinary procedures. Suspension may need to take place to mitigate risk and to ensure the integrity of the process. The decision to suspend can be based on any of the following:

- the safety of those involved (including the perpetrator)
- the safety of the investigation
- the safety of the disciplinary process
- the severity of the allegation - if it has the potential to be dismissal for gross misconduct.

If someone under investigation decides to resign during the process, Brooke will not reduce notice to ensure the process is concluded.

- If an employee is dismissed for proven harm, exploitation or abuse, Brooke will always take legal advice from that country whether to inform the relevant authorities and disclose this to prospective future employers depending on details.
- **Partner organisations:** Appropriate action will be taken up to and including suspension or termination of a partnership or grant agreement where the actions of the partner organisation are found to be inadequate.

8.6 Implementing, maintaining and reviewing the policy

Brooke will integrate safeguarding measures into relevant core internal processes and tools such as programme technical guidelines, partner assessments and agreements, training modules, programme design, monitoring and accountability systems and recruitment procedures.

Brooke will make sure that proper induction and training in safeguarding will be made available to all permanent and temporary staff. The Global Safeguarding Officer and Safeguarding Focal Points in country will receive additional training in order to manage



their responsibilities for rolling out, implementing and coordinating this policy and procedures and for the design and development of local policies and procedures.

Where relevant, Brooke will support partner organisations by including relevant training and technical advice to build capacity in the field of safeguarding.

Each Brooke country safeguarding team will review its safeguarding plan and actions annually for the policy or ensure the work is visible in their annual plan – and in this way report back to the Global Safeguarding Officer.

The Board has overall responsibility for ensuring safeguarding good practice is embedded across the organisation. It receives a confidential annual report on safeguarding from executive management outlining the progress on the safeguarding action plan and the occurrence and response to safeguarding incidents. Trustees will have safeguarding as a standing agenda item receiving reports on safeguarding incidents on a no names basis to allow trustees to ensure that Safeguarding is being prioritised within Brooke.

A full policy review should take place every year, instigated and led by the Global Safeguarding Officer (GSO) to include a review of external changes to safeguarding standards that apply nationally and internationally. Material changes to guidance will be adopted as required sooner and as appropriate.

The Governance Committee reviews Brooke's safeguarding policy and procedures prior to submission to the board for approval and oversees the reporting and investigation of incidents, allegations and risks, ensuring they are managed appropriately.

The Safeguarding Trustee provides appropriate oversight and technical support to Executive Management as needed and supports the Board and Governance Committee in the performance of their roles.

9. Gaining consent to communicate case studies with children and those in vulnerable circumstances

The age at which consent is obtained from the data subject to use personal data will vary according to country laws and legislation. **For the UK the age of consent from a DATA subject to use in case study imagery is 13 years of age and will apply to Brooke work unless stipulated otherwise. This age of consent applies ONLY to collection of case studies and other data.**

Brooke is committed to adhering to ethical guiding principles on communications to minimise the risks of people misusing photographs and related information beyond the agreed purpose and consent. The best interests of the featured adult or child are to be safeguarded as a primary consideration. To this effect, Brooke staff, representatives and partners will abide by the following guidelines.

- Ensure all interviews and images of adults and children are undertaken with sensitivity to safeguard the individual's rights to dignity, identity, confidentiality and privacy. Where possible individuals should be prepared for interviews prior to being interviewed. In the case of children, a parent or guardian should be present during interviews, where appropriate, or their permission sought beforehand for a professional adult with agreed responsibility (such as medical or educational professionals) to be present on their behalf.
- Pictures of adults and children should be decent and respectful and should not stigmatize community, family or the individual. All children, both girls and boys, should wear decent clothing appropriate to the local custom.
- Prior consent to use information collected in interviews and / or images of adults and children should be obtained from the individual themselves (if they possess the maturity to do so), and in the case of children, consent must also be obtained from their parents and/or guardians. To help protect adults and children, consideration should be given to how much information is published.
- The person collecting consent will need to explain clearly the reasons for collecting this information and how Brooke will use their images and stories as well as how long it will be kept according to Brooke's Privacy Statement and Data Retention Policy.
- Brooke and its partners are committed to guard carefully any information about adults and children who feature in their publications, ensuring that their personal data are used appropriately. This also applies when material is made available to third parties and full name, age and community may be taken for the purposes of a consent form. Full names should never be used in external communications.
- Pictures, materials and personal information regarding individuals will be held in a secure database (currently WebDam) and according to the appropriate Brooke data security protocols. Access to these materials will be employees only through a password-protected system. The misuse of images accessed will be treated in the same way as other breaches of this policy. Applicable data protection laws for all stored images will be followed.

Country offices should put in place protocols and will be mindful of when there is a risk of a case study or imagery that depicts the subject being involved in illegal activities within their own country e.g. under-age/bonded labour in brick kilns.

10. Safeguarding Governance (Board responsibilities)

The Board

The Board has overall responsibility for ensuring the safeguarding good practice is embedded across the organisation. It performs this responsibility by ensuring that it has a balanced trustee board, that all trustees receive appropriate safeguarding training, that an appropriate code of conduct is in place, that it reviews the safeguarding policy and procedure annually, that it receives an annual report on safeguarding from executive management outlining the progress on the safeguarding action plan and the occurrence and response to safeguarding incidents and that it ensures that safeguarding is adequately resourced and that risks are clearly articulated in Brooke's risk register.

The Governance Committee

- a. Ensures mechanisms are in place to embed a safeguarding culture across the organisation and with all representatives of Brooke.
- b. Reviews Brooke's safeguarding policy and procedures prior to submission to the Board for approval. Ensures the policy and procedures are regularly updated and in line with regulatory guidance in the UK and with sector best practice. Provides ongoing oversight over plans to embed the policy and in ensuring they meet regulatory requirements. Ensures the policy and procedures are made available to the public.
- c. Oversees the reporting and investigation of incidents, allegations and risks, ensuring they are managed appropriately, take a survivor centred approach and are recorded and stored securely. Provides advice and support on the management of incidents as appropriate. Ensures reporting as appropriate to relevant statutory and regulatory bodies including the police, social services and the Charity Commission. Ensures lessons are learned and necessary changes are made to reduce the risk of any further incidents.

The Safeguarding Trustee

- a. Provides appropriate oversight and support of investigations involving those in positions of significant power in Brooke such as directors and senior managers.
- b. Provides technical support for executive safeguarding roles as needed.
- c. Supports the Board and Governance Committee in the performance of their role.