



Healthy Brains Global Initiative (HBGI) Safeguarding Policy (HBGI UK and HBGI Inc.)

HBGI's mission is to build high-performing mental health systems that maximise outcomes for individuals. HBGI works with commissioners, existing providers and funders both to create new programmes and to improve the performance of existing ones. We lead with individual outcomes in order to optimise efficiency, impact and wellbeing.

HBGI interacts closely in our work with frontline providers who work with vulnerable people, including children and young people. However, we are not a service provider ourselves. This policy outlines:

- our commitment to recognising and protecting the rights of all children and adults at risk;
- expectations of partners we work with; and
- overarching principles for staff that guide our approach to safeguarding.

In line with the United Nations Convention on the Rights of the Child and the Universal Declaration of Human Rights, we recognise that everyone has a right to protection and freedom from abuse and exploitation, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. HBGI strives to develop and communicate safeguarding policies and practices that are inclusive and easily accessible for everyone.

This policy is available to the general public.

HBGI's first Safeguarding Lead is HBGI's Chief of Staff who can be contacted at info@hbgi.org.

1. HBGI's Safeguarding Commitment

1.1 Awareness – We commit to:

- (a) ensuring that all HBGI personnel understand what safeguarding is and its relevance for our projects and programmes;
- (b) ensuring that all HBGI personnel are aware of the safeguarding Code of Behaviour (Annex 1) as part of their onboarding process;
- (c) ensuring that all HBGI personnel know where to access this policy and that it is available on HBGI's website (add URL);
- (d) ensuring that in all of our operations and activities we are doing no harm and adhering to the rights of all children and adults at risk who come into contact with us;
- (e) sharing this policy and safeguarding lessons learnt with our project partners, where relevant; and
- (f) reviewing this policy on a regular basis and when there are major changes to HBGI as an organisation, or legislative changes pertaining to safeguarding.

1.2 Prevention – We commit to:

- (a) working with partners or potential partners to ensure they also uphold strong safeguarding procedures and practices. Where relevant, we will discuss



safeguarding with them and make clear the requirement that they take their obligations seriously;

- (b) ensuring that to the best of our knowledge, everyone working with and for HBGI will take their safeguarding responsibilities seriously; and
- (c) storing all confidential material safely, particularly those containing personal data.

1.3 Reporting – We commit to:

- (a) having a reporting procedure that is easy to navigate;
- (b) supporting frontline providers in developing anonymous reporting procedures;
- (c) ensuring that our personnel understand what actions to take when child protection concerns or disclosures arise;
- (d) ensuring that our personnel and partners know who the HBGI Safeguarding Lead is and how to contact them; and
- (e) reporting to relevant authorities and regulators (including the Charity Commission for England and Wales) if there is a serious safeguarding incident we become aware of.

1.4 Responding – We commit to

- (a) ensuring that the safety of children and adults at risk is always the first priority and that action is taken to support and protect such individuals;
- (b) applying the principle of ‘best interests of the child or adult at risk’ to all safeguarding concerns and disclosures;
- (c) taking all concerns and disclosures seriously and fully supporting any HBGI personnel who in good faith raises his or her concerns;
- (d) handling all concerns and disclosures in a confidential manner, with information shared on a ‘need to know’ basis; and
- (e) ensuring that all incidents are dealt with promptly and reported to the Chief Executive Officer.

1.5 Training and Education - We commit to:

- (a) providing safeguarding training to all HBGI staff working with frontline providers, within three months of starting their roles;
- (b) providing annual refresher training on this policy to all personnel;
- (c) providing staff with additional resources or training if there are specific responsibilities that require such resources or training; and
- (d) encouraging the sharing of experiences and examples of good practice in implementing the policy.



2. Expectations on our Partners to Safeguard

We expect our partners to take the safeguarding and protection of children and adults at risk as seriously as we do. We expect that all partners, where relevant:

- (a) have their own tailored Safeguarding Policy appropriate for their activities;
- (b) have appropriate contextualised training procedures and reporting processes, depending on their activities, jurisdictions and levels of contact with children or adults at risk;
- (c) address any concerns or disclosures in accordance with their own safeguarding policies and national laws;
- (d) report all safeguarding incidents to HBGI. These would include incidents which:
i) involve a HBGI project, ii) involve a member of the partner's staff, iii) have been reported to protection authorities, and/or iv) have been reported by the media, within three days of the incident;
- (e) work collaboratively with HBGI where there are safeguarding concerns or disclosures;
- (f) take any necessary organisational and operational steps to ensure that safeguarding is considered and provided for from the outset of the programmes to their end;
- (g) undertake safeguarding by design, monitoring, evaluation, accountability and learning procedures in their programmes, activities and operations; and
- (h) confirm their understanding of our safeguarding policy, as required for the project.

HBGI is committed to working with partners to ensure that programmes have appropriate safeguarding policies and procedures in place, according to the level of safeguarding risk and contact with children or adults at risk. HBGI reserves the right to conduct appropriate due diligence on its partners and may seek external advice if required.

Should any partner fail to demonstrate due regard for safeguarding or fail to deal with safeguarding issues in line with their policy, HBGI may re-review the partnership and, where appropriate, report the partner to the relevant authorities.

3. Reporting & Responding to Safeguarding Incidents

3.1 Principles

HBGI upholds the following principles throughout the duration of a safeguarding incident (actual or alleged), and supports partners to do the same:

- (a) Protecting the best interests of children and adults at risk;
- (b) Doing no further harm throughout the duration of the case and after its closure;
- (c) Providing support to those involved, including children/adult(s) involved with the incident;



- (d) Protecting the confidentiality of the reporter or whistleblower, people involved with the incident and the subject of the complaint, only sharing information on a need-to-know basis (for example, with protection authorities);
- (e) Where necessary, making operational and programmatic changes to ensure programmes and organisations mitigate the actual safeguarding risks after safeguarding incidents;
- (f) Any report should include, as far as possible, only facts. In the case of direct disclosure of alleged child abuse, the language used by the person disclosing should be recorded as closely as possible;
- (g) Handling all allegations regarding HBGI personnel and partners equitably and transparently (with due regard to confidentiality) irrespective of whom they are made against and taking into account the rights of the parties involved. Whilst aiming to make fair, fact-based decisions, HBGI will always prioritise the well-being of children and adults at risk in its decision-making; and
- (h) Reporting such incidents to relevant law enforcement authorities and regulators as required by applicable law.

3.2 Procedure for a Safeguarding incident relating to HBGI personnel

- (a) An internal Investigation Committee (consisting of the Chief Executive Officer and Safeguarding Lead) will be established.
- (b) The subjects of any allegations may be immediately suspended from their employment or contract without prejudice, whilst the investigation takes place.
- (c) Where feasible, a decision as to whether the individuals in (b) above may return to work, be dismissed or remain suspended as deliberations continue will be made by the Investigation Committee within 28 days of the start of the investigation.
- (d) Upon the conclusion of the investigation, the individuals in (b) above may be subjected to disciplinary action. The incident will also be reported to the relevant authorities if appropriate.
- (e) Victims, witnesses, reporters and whistleblowers shall be provided protection and where appropriate, HBGI may provide access to relevant support services, including trauma-informed therapy.
- (f) HBGI may also seek advice from legal experts.

3.3 Safeguarding incident relating to HBGI program/project partner

HBGI expects partners to inform them within three days of their being made aware of the incident. Where the partner chooses to seek advice or support from HBGI regarding an incident, HBGI will support the partner in investigating the incident in line with the partner's safeguarding policy and local legislation. HBGI will also assist the partner in strengthening its safeguarding procedures.



4. Media and Communications:

To protect users, especially children and young people we will always:

- (a) obtain informed consent from the individuals (or their guardians) before making use of any media;
- (b) take care to research and comply with local traditions or restrictions on reproducing personal images;
- (c) ensure that no pictures of children that can be reasonably interpreted as sexual, degrading or shaming in any way shall be published by HBGI;
- (d) ensure that no personal data or sensitive information about any individual is disclosed in publications or other materials, including surnames or specific location details;
- (e) ensure that pictures, materials and personal information are held in a secure place, and any breaches are reported immediately to the Safeguarding Lead; and
- (f) report and record any complaints or concerns about inappropriate or intrusive images as a safeguarding concern.

5. Monitoring and Review

5.1 HBGI commits to:

- (a) monitoring compliance with this policy and evaluating its effectiveness through regular checks, including reports to the Board; and
- (b) reviewing this policy regularly and where there are changes in legislation or within the organisation that affect this policy.

5.2 Responsibility for this policy sits with HBGI's Safeguarding Lead, with accountability to the CEO and Board of Trustees.

This policy will be approved by the Board and take effect from XXXXX.



ANNEX 1 – Code of Behaviour

HBGI is committed to recognising, promoting and protecting the rights of children and adults at risk. Personnel are expected to treat all children and adults at risk with respect and dignity, prioritising their safety and wellbeing at all times.

This means:

- acting in a way that seeks to care for and protect the rights of people and act in their best interests;
- treating people with respect regardless of their sex, age, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation, gender identity or other status;
- being aware of situations which may present risks and managing, planning and organising the work so as to minimise such risks;
- creating a culture of openness to enable any issues or concerns to be raised and discussed;
- immediately reporting concerns or disclosures of exploitation and abuse and policy non-compliance in line with HBGI's Reporting Procedure;
- disclosing any child related convictions or investigations you have been subject to which occurred before or during your association with HBGI;
- prohibiting the photographing or filming of individuals without their consent;
- prohibiting the use of images in ways which do not respect the dignity of the individuals within those images;
- avoiding all actions or behaviour which may constitute poor practice or (potentially) abusive behaviour;
- protecting all personal information that could affect the safeguarding of individuals; and
- sharing any concerns they may have in relation to safeguarding with the Safeguarding Lead (Chief of Staff, info@hbgi.org)

This is not an exhaustive or exclusive list; the principle remains that HBGI personnel should be aware of our commitment to safeguarding, and understanding what this means in practice.

I have read the above Code of Behaviour, understand it, and agree to comply with it:

Name:

Date:

Role/Title:

Signature:



ANNEX 2 – Definitions

Child – A child is any person under the age of 18, whether living with their families, in state care or living independently¹.

Adult at risk – An adult at risk is any person over the age of 18 who:

- has care and support needs;
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect².

Safeguarding – Safeguarding means taking proactive measures to protect the health, well-being and human rights of individuals, which allow people, especially children, young people and adults at risk to live free from abuse, harm and neglect.

Abuse – Abuse is a form of mistreatment by one individual that causes harm to another person. The range of abuse includes physical abuse, emotional abuse, neglect, sexual abuse and child sexual exploitation.

Exploitation: – Exploitation means persuading, threatening or blackmailing someone into doing something, often through the exchange of goods or money. Exploitation is often sexual but can also include exploiting someone to commit illegal acts such as trafficking or illegal labour.

Partners: – Partners are organisations we work with through our projects and programmes.

Child protection – Child protection means responding to concerns and/or disclosures that a child may be experiencing or be at risk of physical and/or mental violence, injury and/or abuse, neglect and/or negligent treatment, maltreatment and/or exploitation, and/or sexual abuse.

HBGI personnel: HBGI personnel refers to all HBGI employees, contractors, trustees, consultants, fellows, advisors, interns and volunteers.

HBGI Reporting Procedure is the procedure set out for reporting suspected abuse at HBGI or any of its partner organisations. It is set out [where].

¹ Working Together to Safeguard Children 2023, p.7

² Section 42 Care Act 2004



ANNEX 3 – Legal Context and Useful Resources

a) Duties under Charity Law

HBGI is regulated by the Charity Commission for England and Wales. We have duties under the [Charities Act 2011](#) and our duties seek to comply with their duties as summarised in [CC3: The essential trustee: what you need to know, what you need to do](#).

b) Legislative Framework for Safeguarding

This policy and any associated procedures and guidance were developed with reference to key domestic legislation to safeguard and promote the welfare of children and adults at risk of harm affected by our work.

Children	Adults at Risk
Children Act 1989	Care Act 2014
Children Act 2004	Care and support statutory guidance (2024)
Protection of Children Act 1999	Mental Capacity Act 2005
Safeguarding Vulnerable Groups Act 2006	Counter-Terrorism and Security Act 2015
Counter-Terrorism and Security Act 2015	Domestic Abuse Act 2021
Domestic Abuse Act 2021	
Working to Safeguard Children (2024)	
Keeping Children Safe in Education (2024)	

c) Useful Safeguarding Resources

[The National Council for Voluntary Organisations](#) offers a range of safeguarding know-how guidance, training and links to national and local organisations who provide safeguarding support.

[The National Society for the Prevention of Cruelty to Children](#) offers best practice guidance, policy templates, checklists, training as well as research and policy updates on safeguarding.

[The Ann Craft Trust](#) offers resources to assist organisations in safeguarding young people and adults at risk.

[Hourglass](#) offers information relating to the harm, abuse and exploitation of older people in the UK.

[Catalyst](#) offers a selection of information on safer working online.



ANNEX 4 – Reporting Procedures

Current : August 2024

HBGI Safeguarding Lead – Chief of Staff; info@hbgi.org

Reporting Procedure:

