

**Croda Foundation (charity number: 1196455)**

**(the “Foundation”)**

**Safeguarding Policy**

**1. Introduction**

1.1 The Foundation is the corporate foundation of Croda International PLC. It has general charitable purposes, which it furthers through activities including grants of funds, products, and scientific expertise. It works internationally, focussing its grant funding on activities which support the United Nations Sustainable Development Goals (provided that such activities also further the Foundation’s charitable purposes).

1.2 The Foundation does not currently work directly with beneficiaries. Instead, it provides grant funding to other organisations which work directly with beneficiaries (which could include children and vulnerable adults).

1.3 The Foundation is committed to proactively safeguarding and promoting the welfare of its beneficiaries, staff, trustees, and volunteers, and to taking reasonable steps to ensure those who encounter the Foundation do not, as a result, come to any harm.

1.4 Safeguarding is everyone’s responsibility. The Foundation believes that everyone it encounters, regardless of age, gender identity, disability, sexual orientation, or ethnic origin has the right to be protected from all forms of harm, abuse, neglect, and exploitation. The Foundation will not tolerate abuse and exploitation by its Staff or Partners.

1.5 The Foundation has developed this policy to promote protection for all those people it encounters, as well as staff and Croda employee volunteers “**volunteers**” within the Foundation itself and the Partners with which it has relationships. This policy relates to the Foundation’s commitments to safeguarding (as defined by the Charity Commission) and protecting children and vulnerable adults.<sup>1</sup>

**2. What is safeguarding?**

2.1 Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and vulnerable adults wherever possible and dealing sensitively and appropriately with the situation should any incident arise which places a child or vulnerable adult at risk or in which a child or vulnerable adult has suffered abuse.

2.2 Vulnerable persons can be harmed, or put at risk of harm, by organisations and institutions, and abuse of vulnerable groups can happen in all types of organisations. Such harm may result from unintentional acts or deliberate actions.

2.3 Unintentional acts may lead to harm due to a lack of ‘due diligence’ or competence or through organisational negligence, such as inadequate care and supervision, lack of policies, procedures, and

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<sup>1</sup> The Charity Commission has published guidance, “Safeguarding and protecting people for charities and trustees”, which is updated from time to time and available at:

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>.

guidance to inform programming and practice, or lack of staff compliance with legal requirements. Also, deliberate actions may be taken by people with intent to abuse vulnerable people.

### 3. **What is abuse?**

3.1 Abuse can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender, or culture.

3.2 Abuse can take a variety of forms, for example:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Psychological abuse
- Neglect
- Radicalisation
- Financial abuse

3.3 A non-exhaustive list of potential indicators of abuse is set out at **Appendix 1** of this Policy.

### 4. **Scope of this policy**

#### 4.1 ***For the Foundation's staff and contractors***

4.1.1 Compliance with this policy is mandatory for all the Foundation's Staff. For the purposes of this policy "**Staff**" is defined as anyone who works for, or is engaged by the Foundation, either in a paid or unpaid, full time or part time capacity. This includes directly employed staff, staff of Croda International PLC who are seconded to the Foundation, contractors, agency staff, consultants, visitors, researchers, volunteers, interns, and equivalents.

#### 4.2 ***For trustees***

4.2.1 As trustees must always act in the best interests of the Foundation and its ultimate beneficiaries, they are also expected to comply with this policy.

#### 4.3 ***For Partners***

4.3.1 "**Partner**" means any organisation which receives funding from the Foundation, which collaborates with the Foundation to deliver any of its programmes or activities, or which is otherwise associated with the Foundation's name and brand. This policy is intended to work alongside the equivalent policies of the Foundation's Partners, where appropriate. The Foundation expects that the principles and approaches already shared with Partners mean that they will fully support the values and commitments set out in this policy and compliance with this will be a condition in the written grant agreement.

4.3.2 The Foundation will ensure that each Partner has appointed a member of staff who will be responsible for promptly reporting to the Foundation's Safeguarding Officer (or, if they are unavailable, another appropriate person) any safeguarding concerns that arise in, or relevant the context of the partnership.

### ***Consequences of breaches of this policy***

4.4 Breaches of this policy by Staff will be treated seriously and will be treated as a potential cause for disciplinary action (in the case of employees of the Foundation) or termination of the relationship by other means. Breaches by trustees may result in the termination of their trusteeship. Breaches by Partners may result in the termination of the relationship in accordance with the relevant partnership agreement.

## **5. Roles and Responsibilities**

5.1 The **trustees** of the Foundation have ultimate responsibility for ensuring that the Foundation protects from harm all those who come into with it. The trustees have oversight of the Foundation's safeguarding and linked policies and oversee the Foundation's handling of safeguarding reports. The trustees also have responsibility for deciding whether any serious incident reports need to be made to the Charity Commission in relation to safeguarding incidents.

5.2 The trustees may appoint one of their number to act as **Safeguarding Trustee**. The role of the Safeguarding Trustee will be to act as the first point of contact on the board for the Safeguarding Officer, but the appointment of a Safeguarding Trustee will not detract from the fact that all the trustees share collective responsibility for safeguarding within the Foundation.

5.3 The Foundation's **Safeguarding Officer** will:

5.3.1 respond to all child and vulnerable adult safeguarding concerns and enquiries, as set out in paragraph 10;

5.3.2 make any necessary reports to statutory agencies and will keep records of any action taken in response to safeguarding concerns;

5.3.3 ensure the Foundation's policy reflects changes to legislation and is kept up to date in relation to best practice when the policy is reviewed;

5.4 ensure that trustees, members of staff and volunteers have appropriate training in the application of the policy on an annual basis and will review the position annually; and

5.5 monitor the overall trend of any safeguarding concerns and report annually (or more frequently, as appropriate) to the trustees. While all the trustees have a collective responsibility for safeguarding, the Safeguarding Trustee will usually be the first point of contact on the board for the Safeguarding Officer.

5.6 **All Staff** working directly with beneficiaries (including children and vulnerable adults) within or connected with the Foundation's activities/events should be familiar with this policy. In addition, they should conduct themselves in accordance with the Foundation's **Code of Conduct** (which is set out at **Appendix 2**). This provides guidance on acceptable and desirable conduct to protect beneficiaries (and particularly children and vulnerable adults) who may encounter the Foundation.

5.7 **Every individual** who becomes aware of any suspicions or allegations regarding harm to children or vulnerable adults is required to report this immediately to the Safeguarding Officer.

## 6. **Definitions**

6.1 A **child** is anyone under the age of 18.

6.2 A **vulnerable adult** is any person who is aged 18 years or over who, because of their needs for care and support is unable to protect themselves from either the risk of or the experience of abuse or neglect. Whether an individual is a vulnerable adult or not is something which can change with their circumstances and is not fixed. A vulnerable adult may have a mental illness, a learning disability, a physical disability, be frail or be otherwise in need of additional assistance to protect themselves from harm or exploitation, for example, due to social factors such as poverty, displacement or lack of services or support.

## 7. **Examples of the Foundation's activities where it may encounter children and vulnerable adults**

7.1 The current nature of the Foundation's work means that the Foundation will not routinely be directly engaged in activities that are specifically aimed at children or vulnerable adults. However, the Foundation recognises that it funds organisations who do work directly with beneficiaries including children and vulnerable adults and that it is conceivable that the Foundation's own Staff might also have contact with beneficiaries on such projects, for example, if they attend the project to monitor the use of the grant monies.

7.2 The Foundation anticipates that, in the future, it may commence some activities which result in its Staff having direct contact with beneficiaries (which could include children and vulnerable adults), for example, by providing mentoring and training through its Changemakers Programme.

7.3 If the Foundation commences activities in which its Staff will work directly with beneficiaries, the Safeguarding Officer shall consider what steps need to be taken by the Foundation to ensure it is ready to run such activities in a way which promotes the safety and wellbeing of beneficiaries (including children and vulnerable adults). Appropriate steps might include providing additional safeguarding training for Staff who will be involved with such activities and taking professional advice on whether Staff can and should be required to undergo a higher level of DBS check (or overseas equivalent criminal record check) prior to the commencement of the activities.

## 8. **Statement of Commitments**

8.1 The Foundation commits to taking all reasonable measures to ensure all individuals (including children and vulnerable adults) impacted by projects and programmes delivered and/or supported by the Foundation are protected as far as possible from harm, including exploitation, neglect, and abuse of all kinds.

8.2 The Foundation commits to:

(a) Developing a zero tolerance 'safety culture' within the Foundation that creates and maintains protective environments.

(b) Placing safeguarding at the heart of recruitment practices by:

- (i) assessing whether a role is eligible for a standard, enhanced or enhanced (with a check of the barred list) DBS check (or equivalent criminal records check overseas) and, if so, carrying out the highest level of those checks for which the role is eligible;<sup>2</sup>
  - (ii) where a role is not eligible for a standard, enhanced or enhanced (with a check of the barred list) DBS check, carrying out a risk assessment to identify relevant risk factors, including, (1) whether the post-holder may have any contact with children or vulnerable adults and (2) the nature, length and frequency of the contact and whether the contact would be supervised or unsupervised, in order to determine whether it would be appropriate to require a basic DBS check for the role;
  - (iii) requesting at least one written reference;
  - (iv) considering gaps in work history; and
  - (v) checking qualifications and certifications, and, where appropriate confirming a person's right to work in the UK.
- (c) Ensuring the Foundation's Staff and trustees are fully cognisant of protection issues and adhere to the Foundation's Code of Conduct (as set out in Appendix 2).
  - (d) Increasing understanding and raising the awareness of Staff and trustees of risks relating to safeguarding within the organisation and in connection with its activities.
  - (e) Taking appropriate and proportionate action if the policy is not complied with.
  - (f) Maintaining adequate insurance in relation to the Foundation's activities and the people involved, to the extent that it is reasonably available.
  - (g) Carrying out appropriate due diligence on any Partners, which may include ensuring they have appropriate controls and safeguarding measures in place, meet any applicable international standards in carrying out their activities, and integrating safeguarding and onward reporting requirements in the Foundation's partnership agreements, taking account of the Charity Commission's relevant guidance.<sup>3</sup>
  - (h) Making sure people protection considerations are integrated into all aspects of the organisation.
  - (i) Ensuring all Staff and trustees are aware of their responsibilities to report concerns and of steps to take/who to go to report such concerns.
  - (j) Ensuring that safeguarding concerns are addressed promptly and through the appropriate channels.
  - (k) Reporting safeguarding incidents, allegations or concerns to external authorities and regulators, as appropriate, and in accordance with best practice. The Foundation will fully risk assess such reporting to ensure that making a report is not likely to cause further harm to the individual(s) to whom harm has (actually, allegedly or potentially) already been caused.

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<sup>3</sup> The Charity Commission has published guidance "Charities: due diligence, monitoring and verifying the end use of charitable funds" which is updated from time to time and available at:

<https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds>.

(l) Ensuring that its privacy policy remains suitably updated so that it is clear that, in keeping with the Foundation's zero tolerance policy, it will report wrongdoing on the part of its trustees, Staff and Partners to appropriate authorities; will share such information as may be necessary to protect individuals from harm; and will provide fair and accurate references, which appropriately reflect the Foundation's experience and interaction with trustees, Staff and Partners.

## **9. Embedding organisational commitment**

9.1 To make its policy commitments a practical reality, the Foundation will instigate a range of measures that focus on making sure this policy and associated procedures are in place, that Staff are supported to understand and work within the provisions of the policy, that it is fully and effectively integrated into all the Foundation's activities, and that it is subject to monitoring and review.

9.2 The Foundation's Staff and trustees will receive training/briefing on their responsibilities and obligations under this policy and it will form part of the induction for new Staff and trustees.

9.3 Staff and trustees will be expected to acknowledge and accept their responsibilities under this policy. Breaches of this policy by Staff will be treated seriously and will be treated as a potential cause for disciplinary action or termination of the relationship by other means. Breaches by trustees may result in the termination of their trusteeship.

## **10. Reporting and responding to concerns**

10.1 Where any safeguarding concern arises, whether because of an occurrence during an activity or arising from a complaint or otherwise, the concern will be treated seriously and dealt with in accordance with this policy.

10.2 When dealing with a complaint, accusation, or whistleblowing, whether it is from a child, vulnerable adult or a concerned adult, the approach is the same:

- (a) Stay calm and listen carefully to what is said.
- (b) Reassure the person that to tell is the right thing to do.
- (c) Find an appropriate and early opportunity to explain that it is very likely that the information will be shared with others. Do not promise to keep secrets even if the person threatens "only to tell" if it is a secret.
- (d) Allow the person to dictate the pace.
- (e) Ask questions only to seek clarification and make sure they are not leading questions.
- (f) Explain what will happen next, who will be told.
- (g) As soon as possible record in writing what was said using the person's own words whenever possible. Include any dates, times, names, name of person making record and make sure it is dated and signed.
- (h) Also record the name of the person or persons with whom the information will be shared.
- (i) Report to the Safeguarding Officer as soon as possible.

10.3 It is not the responsibility of anyone in the Foundation to decide whether a child or vulnerable adult has been abused. It is however everyone's responsibility to report concerns and comply with this policy.

10.4 The concern must be reported to the Safeguarding Officer who will consider the circumstances and decide whether further investigation is needed or what other action to take. The Safeguarding Officer will ensure that all concerns are properly recorded, and records kept securely and confidentially. The Safeguarding Officer will liaise with statutory safeguarding bodies as required.

10.5 If there is a serious or immediate safeguarding concern which places a child or vulnerable person at risk anyone can make a referral to social services or to the police to prevent harm.

## **11. Next steps to be taken by the Safeguarding Officer**

11.1 On notification of a safeguarding concern, the Safeguarding Officer shall consider the circumstances and decide whether further information gathering is required or what other action to take. The Safeguarding Officer will ensure that all concerns are properly recorded, and records kept securely and confidentially in accordance with the Foundation's Data Protection Policy. The Safeguarding Officer shall liaise with statutory safeguarding bodies as required.

11.2 The Safeguarding Officer shall take steps to ensure that the individual who made the disclosure has access to appropriate ongoing support. They should also offer support to the Foundation representative who heard the initial disclosure.

## **12. Reporting serious incidents to the Charity Commission and other external bodies**

12.1 The Foundation is committed to reporting all relevant incidents to the Charity Commission for England and Wales via a serious incident report in accordance with its Reporting of Serious Incidents Policy.<sup>4</sup>

12.2 The Foundation will also report incidents to other regulatory bodies and government departments or funding bodies, where appropriate. Where there is evidence that criminal activity may have taken place, or concerns have been raised in relation to a child or vulnerable adult, the Foundation will report to the relevant police and/or safeguarding authorities as appropriate (for example to the relevant Local Authority Adult Safeguarding Board), taking appropriate account of the Charity Commission's guidance in this respect.<sup>5</sup>

12.3 Decisions to report to external authorities (including reports to local law enforcement agencies outside of the UK) will be fully risk assessed and anonymisation/pseudonymisation considered when necessary.

12.4 Reporting will not be avoided on the basis that it may harm the Foundation's reputation or give rise to litigation and any concerns in relation to data protection will not act as a barrier to reporting,

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<sup>4</sup> The Charity Commission has published guidance as to what constitutes a serious incident and how to make a report, which is updated from time to time and available at <https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>.

<sup>5</sup> The Charity Commission has published guidance on the criminal reporting of safeguarding offences (including overseas), which is updated from time to time and available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/780835/Criminal\\_reporting\\_of\\_safeguarding\\_offences\\_including\\_overseas\\_v3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780835/Criminal_reporting_of_safeguarding_offences_including_overseas_v3.pdf).

although they will be carefully considered to ensure that the disclosure is made within the legal framework for so doing.

**13. Data protection**

13.1 The Foundation complies with the principles of GDPR and the Data Protection Act 2018 in the way it collects, holds, and disposes of personal information.

**14. Contacts**

The **Safeguarding Officer** is:

Name:	Rommel Moseley
Direct:	07917 144500
Mobile:	07917 144500
Email:	<a href="mailto:Rommel.moseley@crodafoundation.com">Rommel.moseley@crodafoundation.com</a>

If the Safeguarding Officer is unavailable for any reason, or the concern relates to the Safeguarding Officer, it must be reported to the Safeguarding Trustee (if any) or in the absence of a Safeguarding Trustee, to any Trustee.

**15. Publishing this policy**

15.1 The Foundation will ensure that this policy is always publicly accessible on its website.

**16. Review**

17. The Foundation is committed to reviewing this policy and good practice regularly. This policy will be reviewed by the trustees at least annually or when an incident occurs that highlights a need for change – whichever occurs first.

**Date of policy:** January 13 2022

**This policy will be next reviewed no later than:** January 12 2024



## Appendix 1 - RECOGNISING SIGNS OF ABUSE

It can often be difficult to recognise abuse. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further. Someone can abuse a child/vulnerable adult by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional, work or community setting, by telephone or on the internet, at events (hosted externally or internally), or when carrying out research. Abuse can be carried out by someone known to the person or by a complete stranger. If you are worried about a child/vulnerable adult it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

The following is a non-exhaustive list of signs of abuse of children and adults.

### A. Children

<b>Physical Abuse</b>	Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication.
<b>Emotional Abuse</b>	Emotional abuse is the emotional ill treatment 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, unloved or inadequate or causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age or developmentally inappropriate expectations. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.
<b>Sexual Abuse</b>	Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not they are aware of what is happening. This may involve physical contact, including penetrative or non-penetrative acts or non-contact activities, such as involving children in looking at, or the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
<b>Neglect</b>	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. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failure to protect a child from physical harm or danger, or failure to ensure access to appropriate medical care or treatment.

### B. Adults

<b>Physical Abuse</b>	Physical abuse is the deliberate infliction of pain, physical harm or injury and includes withholding or misuse of medication.
<b>Psychological abuse</b>	Psychological abuse is any pattern of behaviour by another that results in harm and may include insults, humiliation, ridicule, bullying, threats, enforced isolation, interference in relationships and contact between consenting adults, coercion, lack of privacy or choice, denial of dignity.
<b>Sexual Abuse</b>	Sexual Abuse is any sexual activity involving but carried out without the informed consent of a vulnerable adult. Sexual abuse may include sexual intercourse, inappropriate touching, offensive or suggestive language, 'voyeuristic' behaviour and exposure to the suggestive or sexually explicit activities of others, including films, photographs, images etc.
<b>Financial or material abuse</b>	Financial abuse is the misappropriation of funds (savings or income) or property of a vulnerable adult. This may include exploitation, theft or fraudulent use of money, misuse of property or possessions and incurring financial liabilities on behalf of a vulnerable adult without their informed consent.
<b>Neglect and acts of omission</b>	Neglect may be deliberate or by default where the abuser is not able to provide the care and support needed or may not recognise the need for the care and support to be given. The abuser may also be neglecting themselves.
<b>Discriminatory abuse</b>	When the vulnerable adult is harassed or discriminated against because of their age, race, gender, sexuality, religion, disability, culture etc.

<b>Self Neglect</b>	Where the adult at risk is neglecting to care for their own personal hygiene, health, or surroundings.
<b>Modern Slavery</b>	Includes forced labour, debt bondage, sexual exploitation, criminal exploitation, and domestic servitude.
<b>Domestic abuse</b>	Includes controlling, coercive, or threatening behaviour and / or violence between people who are or have been intimate partners or family members. Abuse can take a variety of forms, not only physical but also psychological, sexual, emotional, social, financial, intimidation and neglect.

## **Appendix 2 – Safeguarding Code of Conduct**

The Foundation's Staff:

1. shall treat everyone with dignity and respect regardless of differences of ethnicity, religion, age, ability, gender, sexual orientation, class, and economic circumstances;
2. shall not use language or behaviour towards anyone they encounter through their work at the Foundation that is verbally or physically intimidating, threatening, humiliating, degrading, shaming, blaming, sexually provocative or coercing;
3. shall not give personal gifts or cash to beneficiaries;
4. shall not initiate or respond to sexual contact with children or vulnerable adults or enter an emotionally intimate relationship with a child or vulnerable adult and shall avoid all unnecessary physical contact with children or vulnerable adults;
5. shall avoid showing favouritism towards particular participants in Foundation activities;
6. shall not develop relationships with children and/or vulnerable adults outside of the scope of the Foundation's activities and events and shall not contact children or vulnerable adults from their personal phones, email addresses or social media accounts;
7. shall not be alone with a child or vulnerable adult in a private place that cannot be readily seen by other responsible adults;
8. shall not use electronics (laptop, phone, etc.) issued by the Foundation or any Foundation resources whatsoever to access any pornography from the internet, forward pornographic emails, or gain opportunities for sexual encounters;
9. shall not offer cigarettes or alcohol to children or vulnerable adults;
10. shall not use their personal electronic devices such as mobile phones or tablets to take any photographs or videos of children or vulnerable adults, shall not post information about children or vulnerable adults on social media and shall not post anything to social media which would bring the Foundation into disrepute;
11. shall not invite children or vulnerable adults who they have met through the Foundation's activities into their home;
12. are always responsible for the interaction between an adult and a child even when it appears that a child is acting in a provocative manner. It is the responsibility of the adult to set appropriate boundaries that protect the best interest of the child;
13. shall ensure that all events and activities involving any children/ vulnerable adults are in the best interests of the children involved; and
14. shall immediately report any safeguarding concerns to the Safeguarding Officer.