



**ALEXANDRA PARK AND PALACE CHARITABLE TRUST  
BOARD MEETING**

**19 JULY 2022**

**Report Title:** Review of Policies (Safeguarding & Whistleblowing)

**Report of:** Catherine Solomon (Director of HR & Organisational Development)

**Purpose:** To seek approval of updates to key board level policies.

**Local Government (Access to Information) Act 1985** N/A

**1. Recommendations**

- 1.1 To approve and adopt the updated Safeguarding Policy, attached at Appendix 1.
- 1.2 To approve and adopt the updated Whistleblowing Policy, attached at Appendix 2.

**2. Executive Summary**

2.1 On induction board members receive the organisation’s key policies. The key policies for which the Trustee Board and it’s Trading Subsidiary Board are responsible are listed in table 1 below and form part of an organisation wide register of policies. It is good practice to periodically review these, usually annually, bi-annually or as required when legislation or guidance changes.

2.2 Table 1 – Board Level Policies

DOCUMENT TITLE	DATE ISSUED	Last Reviewed	Next Review Due
Board Member Expenses Policy	Sept 2018	Jun-19	
Risk Appetite (& Risk Management Policy)	Feb 2018	Sept. 2019	Aug 22
Reserves Policy	April 2016		Aug 22
APTL Board Code of Conduct	June 2017	March 2020	
APPCT Board Code of Conduct	June 2017	March 2020	
Conflicts of Interest Policy - Trust	April 2016	March 2020	
Conflicts of Interest Policy - APTL	June 2019	March 2020	
Complaints Policy	Feb 2018	March 2020	July 2022
Whistleblowing Policy	June 2017	March 20	
Safeguarding Policy	June 2017	Jan 2020	
Health & Safety Policy	Nov 2018	March 2020	
Serious Incident Reporting Policy (SIR)	March 2018	March 2020	

2.2 This report informs trustees of recent updates to the Safeguarding and Whistleblowing Policies.

### 3. Safeguarding Policy Updates

#### Section 1. Introduction

- The reference to “vulnerable adults” has been updated throughout the policy as it is best practice to move away from this terminology and, instead, to use the definition from the Care Act – Adults at Risk  
<https://www.anncrafttrust.org/resources/safeguarding-adults-at-risk-definitions/>

#### Section 4. Definitions

- Job title of Designated updated to Director of HR and OD
- Partners added to list of individuals providing services or performing work.
- Reference to HIV/Aids removed as this is not considered as a marker of an adult being at increased risk of harm or abuse.
- Reference to significant harm has been amended to harm as it could be interpreted as suggesting that low-level abuse will be tolerated. NSPCC’s working definition of Child Abuse - <https://learning.nspcc.org.uk/research-resources/briefings/definitions-signs-child-abuse>

Section 5. Legal expectations and requirements - Guidance and Charity Commission updates referenced with revised dates.

#### Section 6. Scope of our work

- Creative Learning activities have been updated at 6.3
- Reference to our medical contractor – new section added at 6.8
- Ask for Angela – new section added at 6.10
- Responsibilities in relation to fundraising new added at 6.11

Section 8. Operating safely online – new section added

Section 9. Safeguarding Roles and Responsibilities and Section 13 – Responding to concerns - Policy updated to reflect arrangements for when we are in Event Mode

The 2018 guidance only covered child protection/safeguarding, therefore reference and a link to the most relevant guidance for adult safeguarding has also been added (Making Safeguarding Personal (MSP) guide).

#### **4. Whistleblowing Policy Updates**

The main changes are as follows:

- Additional wording in order to make sure the policy is compliant with whistleblowing legislation and its aims.
- More encouragement to make disclosures and in the appropriate way, e.g. setting out the right to be accompanied to meetings, clarifying what happens if the whistleblower is mistaken, , explaining the limitations when responding to anonymous disclosures;
- Amended wording around there being no reprisals for raising concerns
- Stronger discouragement to take concerns to external bodies;
- Clarity to make each of the stage procedure a bit clearer.

#### **5. Is the decision/ action consistent with the Charity's Vision, Mission Purpose and Values? Five Year Plan priority pillars?**

- 5.1 The policy updates are in line with the Charity's mission and values and have no negative impacts on any EDI groups.

#### **6. Legal Implications**

The Council's Head of Legal & Governance has been consulted in the preparation of this report. The Charity Commission recommends that protecting people and safeguarding responsibilities should be a governance priority for all charities. The safeguarding policy reflects the expectations set out in Charity Commission Guidance. The Whistleblowing Policy is compliant with whistleblowing legislation.

#### **7. Financial Implications**

The Council's Chief Financial Officer has been consulted in the preparation of this report and has no comments.

#### **8. Use of Appendices**

Appendix 1 – Safeguarding Policy  
Appendix 2 – Whistleblowing Policy

#### **9. Background Papers None**