

Safeguarding Policy

Document Version No	5
Agreed by Board of Trustees	8 th August 2025
Review Schedule	Once a year or (if sooner) in light of material changes to safeguarding legislation or guidance
Next Review Date	August 2026
Owner Responsibility	Chief Executive Officer

1. Introduction

- 1.1 Unlimit Health (previously known as “**SCI Foundation**”) is committed to running its operations with transparency, empowerment, and inclusion. Unlimit Health believes that everyone we interact with, 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. Unlimit Health takes a zero-tolerance approach to abuse and exploitation within our organisation, and we work closely with our partners to implement safeguarding best practice on projects that they deliver.
- 1.2 All Unlimit Health staff and associated personnel must act in accordance with this policy. In addition, Unlimit Health staff and associated personnel must sign and be held accountable to Unlimit Health’s Code of Conduct. Unlimit Health will apply appropriate disciplinary measures to staff found in breach of this policy and/or Unlimit Health’s Code of Conduct.
- 1.3 This policy does not form part of any contract of employment or contract for services, and we may amend it at any time.
- 1.4 Partners of Unlimit Health will be expected to have their own safeguarding policies, procedures, and codes of conduct in place. If a partner does not have appropriate safeguarding measures in place, Unlimit Health will support them to develop (or uphold) their own safeguarding policies, procedures, and codes of conduct.

2. Purpose

- 2.1 The purpose of this policy is to set out how Unlimit Health works to protect people, particularly children and adults at risk, from harm. In particular, this policy:
 - lays out the commitments made by Unlimit Health to provide a safe and protective environment, as far as reasonably possible, for people who interact with Unlimit Health or our partners;
 - informs Unlimit Health staff and associated personnel of their responsibilities in relation to safeguarding;
 - sets out how Unlimit Health will respond to safeguarding concerns; and
 - outlines how we work with our partners to promote and facilitate wider safeguarding best practice.
- 2.2 This policy does not cover:
 - sexual harassment in the workplace – this is dealt with under Unlimit Health’s Anti Bullying and Harassment Policy; or
 - safeguarding concerns in the wider community not perpetrated by Unlimit Health staff or associated personnel or partners.

3. Glossary of Terms

- 3.1 **Associated personnel** – any person (other than Unlimit Health employees or workers) who has a contract to work for, or provide services to, Unlimit Health or who is representing Unlimit Health in any capacity. This includes, but is not limited to, interns, consultants, trustees and volunteers.
- 3.2 **Beneficiary of assistance** – people participating in treatment or survey activities supported by Unlimit Health.
- 3.3 **Child** – a person below the age of 18.
- 3.4 **Grooming** – action or behaviour used by someone to build a relationship, trust and emotional connection with a child or young person (and/or their family) so they can manipulate, exploit and abuse such child or young person.
- 3.5 **Harm** – psychological or physical harm and any other action or inaction by another person (whether deliberate or unknowing, and whether contained in a single act or repeated acts) that causes infringement of an individual's rights.
- 3.6 **Online abuse** – any type of abuse that happens via the internet, facilitated through the use of technology such as computers, tablets, mobile phones and other internet-enabled devices. Online abuse can happen anywhere online that allows digital communication, such as social networks, text messages and messaging apps, email and private messaging, online chats, comments on live streaming sites and voice chats in games. Online abuse can take the form of bullying/cyberbullying, emotional abuse, sexting, sexual abuse or sexual exploitation.
- 3.7 **Partner** – delivery partners, sub-contractors, and organisations that receive funding from Unlimit Health. This includes, but is not limited to, government ministries and departments, and national and international non-government organisations (**NGOs**).
- 3.8 **Psychological harm** – emotional or psychological abuse including, but not limited to, humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.
- 3.9 **Protection from Sexual Exploitation and Abuse** – the term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13).
- 3.10 **Safeguarding** – the steps Unlimit Health takes to protect people (including children and adults at risk) from harm that might arise from interaction with our organisation, and the steps we take to work proactively with partners to facilitate safeguarding best practice.
- 3.11 **Sexual abuse** – actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- 3.12 **Sexual exploitation** – actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. This includes human trafficking and modern slavery.
- 3.13 **Survivor** – a person who has been harmed, abused, or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience, and the capacity to survive, however, it is the individual's choice how they wish to identify themselves.
- 3.14 **Adult at risk** – sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age, or illness, and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

4. Unlimit Health's principles of safeguarding

Unlimit Health is committed to the seven key principles that should underpin all safeguarding functions, actions, and decisions, as set out by the UK Care Act 2014 and in the key statutory guidance for anyone working with children and young people (“**Working Together 2023**”):

- 1) **Do No Harm** – reduce the potential for interventions to cause harm
- 2) **Empowerment** – support and encourage individuals to make their own decisions
- 3) **Protection** – support those in greatest need, including as a result of abuse or neglect
- 4) **Prevention** – take action before harm occurs or risk escalates
- 5) **Proportionality** – the least intrusive or restrictive intervention appropriate to the risks presented
- 6) **Partnership** – work across services and communities to prevent, detect and report neglect and abuse
- 7) **Accountability** – accountability and transparency in safeguarding practice

Unlimit Health applies these principles to both children and adults.

Unlimit Health recognises that it has responsibilities for the safety and care of children under the Children Act 1989 and 2004 and Working Together 2023. Unlimit Health will act in accordance with all relevant legislation including the Domestic Abuse Act 2021, the Terrorism Act (2000) and the Modern Slavery Act 2015.

5. Scope

- 5.1 This policy covers the following areas of safeguarding:
 - child safeguarding;
 - adult safeguarding; and
 - protection from sexual exploitation and abuse.
- 5.2 Unlimit Health is committed to addressing safeguarding in all areas through the three pillars of prevention, reporting and response.

6. Prevention - Roles and responsibilities

6.1 Organisational responsibilities

Unlimit Health will:

- ensure all staff and associated personnel have access to, are familiar with, and know their responsibilities within this policy;
- work with partners to design programmes and activities which are supported by Unlimit Health in a way that protects people from the risk of harm. This includes the way in which information about individuals in programmes we support is gathered and communicated (please refer to our communications guidelines);
- implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associated personnel;
- ensure staff and associated personnel receive appropriate training on safeguarding; and
- follow up on reports of safeguarding concerns promptly and according to due process.

6.2 Board of Trustees’ responsibilities

- 6.2.1 Safeguarding will be a standing item at meetings of Unlimit Health’s Board of Trustees and will include:
 - an update of the safeguarding task team and departmental update;

- partners' reports;
- updates to the safeguarding register and overview of the number and type of safeguarding cases (with no personal identifiable information and/or explicit detail); and
- review or support with reporting safeguarding matters as serious incidents to the charity commission.

- 6.2.2 A Safeguarding Trustee will be appointed to and will:
- be part of the safeguarding committee when convened; and
 - support and advise the safeguarding focal persons when requested.

6.3 Staff and associated personnel's responsibilities

- 6.3.1 Unlimit Health staff and associated personnel must:
- adhere to Unlimit Health's Code of Conduct;
 - familiarise themselves with this policy and apply it in their work for or on behalf of Unlimit Health;
 - contribute to creating and maintaining an environment that protects people from harm, including harm caused online, prevents safeguarding violations and promotes the implementation of this policy;
 - report any safeguarding concerns, including online concerns, or suspicions using the procedure set out below; and
 - cooperate with any safeguarding investigation.
- 6.3.2 Unlimit Health staff and associated personnel must not:
- engage in sexual activity with anyone under the age of 18;
 - sexually abuse or exploit children;
 - subject a child to physical, emotional, or psychological abuse, or neglect;
 - engage in any commercially exploitative activities with children including child labour or trafficking.
- 6.3.3 Unlimit Health staff and associated personnel must not:
- sexually abuse or exploit adults at risk;
 - subject an adult at risk to physical, emotional, or psychological, or neglect;
 - subject an adult at risk to financial abuse (examples include stealing from, defrauding someone of, or coercing someone to part with money, goods and/or property).
- 6.3.4 Unlimit Health staff and associated personnel must not:
- exchange money, employment, goods, or services (including the outputs of Unlimit Health's work) for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour;
 - engage in sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.
- 6.3.5 Unlimit Health staff and associated personnel must not:
- take part in any form of online abuse or grooming;
 - contribute to the re-victimisation of individuals having suffered abuse by recording, uploading, or sharing abusive content available offline or online.

7. Reporting safeguarding concerns

7.1 Confidentiality

- 7.1.1 It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to a safeguarding concern and subsequent case management will be shared on a need-to-know basis only.
- 7.1.2 Records of safeguarding concerns should be kept secure at all times.
- 7.1.3 For reporting purposes, a redacted report will be used giving an outline of the complaint safeguarding concern, but without any information that would reveal the identity of the individuals involved.

7.2 How to report a safeguarding concern

- 7.2.1 The procedure set out below provides a safe and accessible means of reporting safeguarding concerns and is available to staff, associated personnel, partners and beneficiaries of assistance.
- 7.2.2 Anyone who makes a report under this procedure will be protected against any negative repercussions as a result of raising a safeguarding concern.
- 7.2.3 Partners and beneficiaries of assistance can report safeguarding concerns relating to our work or the work that we fund to a member of Unlimit Health staff or through the whistleblowing hotline AAB People (formerly "SeeHearSpeakUp") (see below). Unlimit Health will also accept safeguarding reports from external sources (such as members of the public and official bodies).
- 7.2.4 Unlimit Health staff or associated personnel who have a safeguarding concern, or who suspect or are made aware of a safeguarding concern, should report it immediately to their line manager or to the Safeguarding Focal Point. It is not the responsibility of the individual, who has a safeguarding concern, to decide whether abuse has happened.
- 7.2.5 If an individual does not feel comfortable reporting the matter to the Safeguarding Focal Point or their line manager (for example, if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other senior manager or the CEO.

Safeguarding Focal Point – safeguarding@unlimithealth.org (email accessed by three Safeguarding focal points: Joshua Oliech, Carolyn Henry and Estelle Leach-Francais)

Department	Line manager email
Technical Team	l.blair@unlimithealth.org
Research and Innovation Team	f.fleming@unlimithealth.org
Finance and Operations	j.oliech@unlimithealth.org
Partnerships and Communications	jd.millar@unlimithealth.org
CEO	w.harrison@unlimithealth.org

- 7.2.6 The Safeguarding Trustee can also be contacted to raise a complaint if the above mechanisms are not suitable. This is Dr Camilla Ducker (boardsafeguarding@unlimithealth.org).
- 7.2.7 In addition to the above, an independent whistleblowing hotline is available for use by staff, associated personnel, and external parties. The hotline will accept concerns via phone, email or the webpage. Concerns can be anonymous, however, to be able to deal with the concern to the best of our ability, it is helpful to give contact information.
- 7.2.8 Any staff and associated personnel may also choose to use Unlimit Health's Whistleblowing Policy to report safeguarding concerns. A copy of the Whistleblowing Policy is available on SharePoint and on Unlimit Health's website <https://unlimithealth.org>.

8. Unlimit Health Response

- 8.1.1 Unlimit Health will follow up safeguarding concerns according to our agreed policies and processes, and in line with our statutory and regulatory obligations.
- 8.1.2 Unlimit Health will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

9. Working with partners

9.1 Collaboration

- 9.1.1 Unlimit Health works collaboratively with partners and it is primarily our partners who work directly with children and adults at risk.
- 9.1.2 We do not design or directly implement the activities that we fund, and our partners have ownership of their work. While Unlimit Health is unable to enforce safeguarding policies or practices in our partners organisations, we recognise our duty to fund safe programmes and activities and we achieve this through the following steps.

9.2 Pre-partnership

- 9.2.1 Partners are expected to have appropriate policies and procedures in place covering safeguarding before Unlimit Health enters into a partnership agreement, contract, or Memorandum of Understanding.
- 9.2.2 All partners will enter into a Service Agreement which requires the partner to commit to having in place a safeguarding policy and code of conduct that are at least as strong as Unlimit Health's safeguarding policy and code of conduct.
- 9.2.3 As part of Unlimit Health's partner due diligence process, we will conduct a review of each partner's policies and processes that make reference to safeguarding.
- 9.2.4 Where partners do not have policies and procedures which are deemed essential by Unlimit Health, appropriate safeguarding measures for the activities that Unlimit Health supports will be developed as part of the early stages of the partnership, led by our due diligence process. While this process is taking place, the partner can adopt Unlimit Health's Code of Conduct and Safeguarding Policy.
- 9.2.5 Local legislation must be followed by all partners. If Unlimit Health's policy is more stringent than local legislation, then this policy will be followed to achieve the highest standard of safety.

9.3 During the partnership

- 9.3.1 Partners will receive training in safeguarding and in the Unlimit Health Safeguarding Policy in particular. The training will be specific to the activities carried out by partners in cooperation with Unlimit Health.
- 9.3.2 Training Modules:
 - 1. Introduction to safeguarding
 - 2. Reporting concerns
 - 3. Safeguarding in practice
 - 4. Safeguarding during Coverage Evaluation Surveys and Impact Assessment Surveys.

- 9.3.3 Who will receive the training?
Any new partner will receive training on Unlimit Health's Safeguarding Policy and on how to implement such a policy. Partners in ongoing partnerships will receive a refresher training before activities such as Impact Assessments and Coverage Evaluation Surveys. Partners can also request bespoke training.
- 9.3.4 Each partner we work with will be given the opportunity to access supportive planning with the safeguarding team at Unlimit Health. This will include mentoring, coaching and supportive supervision of implementation of their safeguarding plans. We will also offer a critical review of their policy and processes related to safeguarding.
- 9.3.5 All partners and their staff or associated personnel will be able to access Unlimit Health's whistleblowing line to report a safeguarding concern related to the work that is carried out with Unlimit Health. If a report is made which relates to work outside the scope of Unlimit Health's partnership, we will make all reasonable efforts to pass information about the concern onto the relevant organisation (if known).
AAB People (formerly "SeeHearSpeakUp")
Tel: Global +44 1224 379 303, UK 0800 056 2539, USA 1 855 290 6405
Email: report@aabpeople.global
Web: www.seehearspeakup.co.uk/unlimithealth
- 9.3.6 Unlimit Health will support partners to respond to safeguarding concerns, including assist with investigations, if required, in line with the Unlimit Health process.
- 9.3.7 Unlimit Health will expect partners to manage and respond to safeguarding concerns effectively and in a timely manner. If a partner fails to cooperate with any investigation that Unlimit Health deems necessary in the area of safeguarding, Unlimit Health may decide to end the partnership.
- 9.3.8 Unlimit Health will monitor safeguarding procedures by partners through:
- Annual reviews; and
 - Final reports.
- 9.3.9 Annual reviews and final reports will be reviewed by the Donor Stewardship Manager who will pass the findings to the Safeguarding Focal Person to collate the report for the Board of Trustees.

10. Associated policies

This policy should be read alongside the following policies and procedures (which are available on the SharePoint):

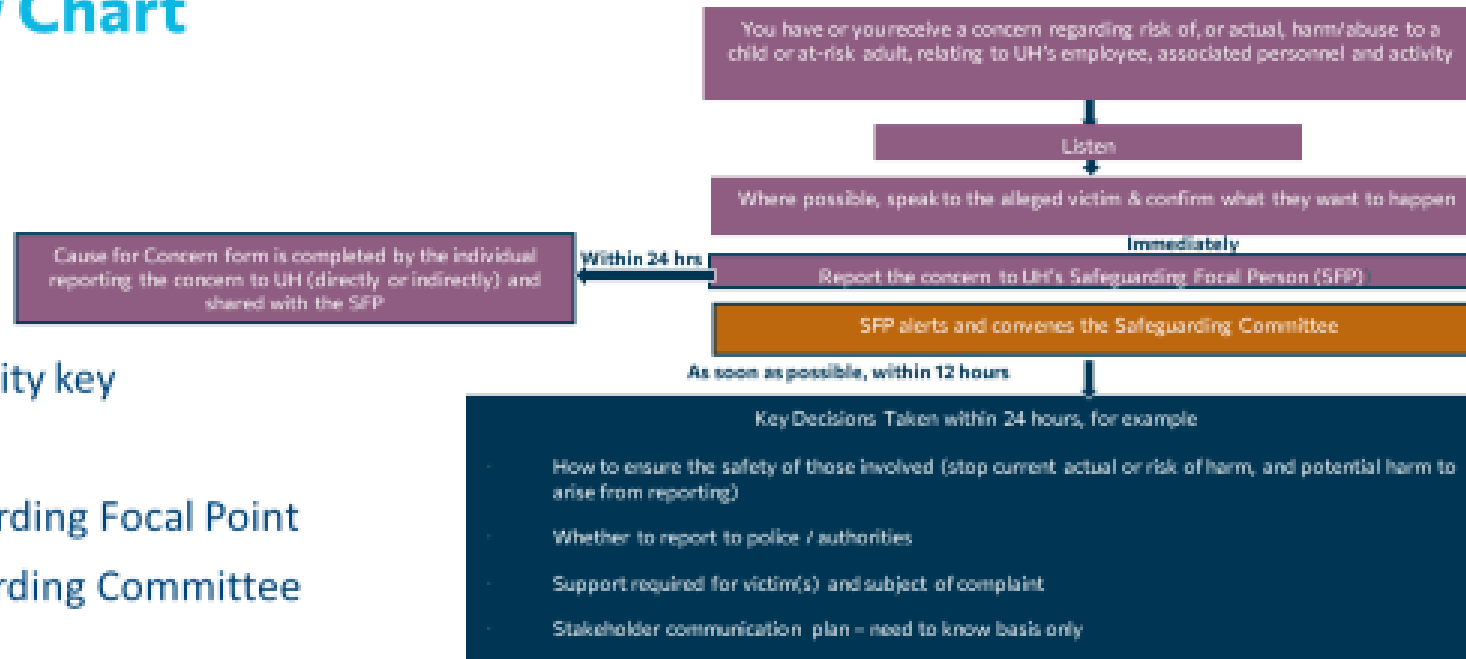
- Code of Conduct
- Social Media Policy
- Whistleblowing policy
- Disciplinary policy
- Grievance policy
- Equal and diversity policy
- Health & Safety policy
- Relationship Review Policy
- IT Information and IT Security Policy
- Communications Guidelines Link to policies: Finalised Policies

The Policy was approved by the SLT: 17/07/2025

Approved by Board of Trustees on: 8th August 2025.

Appendix

Report and Response Flow Chart



Ending parasitic disease, together

By signing I confirm I have read and understood this policy and procedures.

Print Name _____

Title _____

Date _____

Signature _____