



## Spread a Smile Safeguarding Policy

### Policy Information

| Item             | Details                                                                                                                                 |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| Policy title     | Safeguarding Policy                                                                                                                     |
| Policy owner     | Director of Strategy and Operations                                                                                                     |
| Approved by      | Safeguarding Lead Fiona Hikmet on behalf of Board of Trustees                                                                           |
| Version          | 5.0 (2026)                                                                                                                              |
| Effective date   | September 2026                                                                                                                          |
| Review date      | September 2027                                                                                                                          |
| Related policies | Code of Conduct, Whistleblowing Policy, Recruitment Policy, Data Protection Policy, Social Media Policy, Photography and Consent Policy |

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### 1. Why do we need this policy?

Spread a Smile is a registered charity in England and Wales (1152205) and provides entertainment and special events (both virtually and in-person) for children and young people with serious illness, and their families.

Spread a Smile is committed to safeguarding and protecting the welfare of everyone who uses our services. We recognise that we have a responsibility to protect the welfare of children and adults and to ensure that they are protected from harm.

### 2. Who must follow this policy?

This policy covers all work and services carried out by us. Therefore, it applies to all Spread a Smile representatives (staff, non-salaried staff, volunteers and trustees) who must follow this policy:

- Read and understand this policy.
- Seek guidance from the designated safeguarding team if further clarification is needed.
- Confirm that they have read, understand, and agree to follow this policy.

The purpose of this policy is to ensure that Spread a Smile has appropriate policies and procedures in place to ensure that the welfare of children and adults is promoted, and that they are protected from harm.

We will implement this policy by:

- Creating a culture where children and adults are valued and their right to safety and respect is upheld.
- Ensuring the safety of children and adults who interact with Spread a Smile by effectively managing risks to minimize potential harm.
- Working collaboratively with other organisations to ensure that children and adults are safeguarded and protected.
- Informing partners, beneficiaries and the general public of our approach to safeguarding and protecting children and adults.
- Providing all staff, volunteers and trustees with the overarching principles and procedures that guide our approach to safeguarding and protecting children and adults.
- Undertaking proportionate safeguarding checks and agree clear safeguarding responsibilities when working with partner organisations, contractors and other third parties.

In doing so, we will establish a 'safe space' for all.

**Creating a Safe Space, ensuring we all feel safe:**

A 'Safe Space' is a place or environment in which a person or category of people can feel confident that they will not be exposed to discrimination, criticism, harassment or any other emotional or physical harm.

**Creating a Safe Space 'In Real Life' (IRL)**

All Spread a Smile representatives must be familiar with and agree to follow this policy. We will also ensure that:

- Key hospital partner contacts have a clear understanding of our safeguarding responsibilities and what action we will take to fulfil these.
- All volunteers read and sign our volunteer agreement.
- Anyone who accesses our services understands their responsibilities in respect of creating a safe space.

**Creating a Safe Space 'in a Digital Setting' (IDS)**

All digital sessions are facilitated via Zoom<sup>i</sup> by a trained member of staff. A Spread a Smile Visit Manager will take responsibility for ensuring the Zoom settings are appropriate for the nature of the session. Information will be sent out prior to the session to ensure that all children and their families are aware of the steps Spread a Smile will take to create a safe space online.

We have a clear operating procedure and Visit Managers receive digital safeguarding training to ensure they are equipped to deal with any concerns that may arise during the session. All participants, their families, professionals and Spread a Smile representatives will be provided with information about what will happen in the event of a concern and how to raise any concerns that they may have. Further information about online risks and expected practice is provided in Section 10.

#### **4. Legislative and Regulatory Framework**

This policy is informed by:

- Children Act 1989
- Children Act 2004
- Care Act 2014
- Equality Act 2010
- Human Rights Act 1998
- Domestic Abuse Act 2021
- Data Protection Act 2018 and UK GDPR
- Online Safety Act 2023
- Children's Wellbeing and Schools Act 2026
- Working Together to Safeguard Children 2026
- Relevant Charity Commission safeguarding guidance

Spread a Smile will review its safeguarding arrangements regularly to ensure continuing compliance with legislative and regulatory requirements.

#### **5. Our Safeguarding Principles**

**Spread a Smile is committed to:**

- Empowerment
- Prevention
- Protection
- Partnership
- Proportionality
- Accountability

**These principles underpin everything we do.**

**In addition, we will:**

- Listen to children, young people and families.

- Promote dignity, respect and participation.
- Recognise the impact of trauma.
- Take an inclusive, equitable and anti-discriminatory approach (set out in Section 8).
- Challenge discrimination, prejudice and bias.
- Respond to concerns promptly and appropriately.

**We believe that:**

- Children have the right not to be harmed.
- Children have the right to be listened to.
- Children have the right to get help and support when they need it.

## **6. Understanding Safeguarding and Types of Harm**

**Safeguarding means:**

- Protecting children<sup>1ii</sup> from maltreatment, including abuse, neglect and exploitation.
- Preventing impairment of children's mental and physical health and development.
- Ensuring children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable children and young people to have the best possible outcomes.

Safeguarding also includes protecting adults at risk from abuse and neglect and promoting their right to live safely and free from harm.

**Main forms of abuse**

Abuse may include:

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse
- Neglect
- Financial or material abuse
- Domestic abuse
- Discriminatory abuse
- Organisational abuse

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<sup>1</sup> For the purposes of this policy the definition of a 'child' or 'young person' is anyone aged under 18 years of age, as supported by legislation and guidance across the UK. Safeguarding action may also be required before birth where concerns exist about an unborn child's future welfare or safety.

- Online or digital abuse
- Modern slavery and exploitation.

### **Additional safeguarding risks**

Representatives should also remain alert to:

- Child sexual exploitation
- Criminal exploitation
- County lines activity
- Child-on-child abuse, including abuse within intimate relationships between young people
- Bullying and cyberbullying
- Forced marriage
- Female genital mutilation
- Radicalisation and extremism
- Self-harm and suicidal ideation
- Online grooming
- Harmful online content
- AI-generated harmful or misleading content
- Coercive and controlling behaviour
- Honour or faith or belief-based abuse.
- Child sexual abuse, including abuse that may be hidden or difficult to identify.

This is not an exhaustive list and there is not necessarily a clear dividing line between one type of abuse and another. Children and adults may experience multiple forms of harm simultaneously. Concerns should be considered in the context of the individual's overall circumstances and vulnerabilities.

A person or persons may abuse or neglect a child either by inflicting harm or failing to act to prevent harm. Child abuse includes the impact of witnessing ill treatment of others, such as being exposed to domestic abuse.

### Which children might be abused?

Any child can be abused regardless of their age, gender, race, perceived abilities, sexual orientation, religion or socio-economic status. However, some children and young people are at increased risk from harm and abuse, including those who are:

- Considered to have disabilities and/or special educational needs
- Young carers
- Frequently missing from home

- Subject to familial/parental substance misuse
- Subject to mental health issues or domestic abuse
- Misusing substances themselves
- Or have been in local authority care or who are privately fostered
- Babies under the age of one

### Safeguarding adults

The Care Act 2014 sets out the circumstances in which local authority adult safeguarding duties apply. Spread a Smile will nevertheless take seriously and respond appropriately to any concern about an adult's safety or wellbeing, whether or not the statutory threshold is known to have been met.

## **7. Recognising possible signs of abuse or harm**

It can be very hard for children or adults to speak out about abuse. Often, they fear there may be negative consequences if they tell anyone what's happening to them. Therefore, it is vital that children and adults can speak out and that whoever they tell takes them seriously and acts on what they've been told.

However, even if a child or adult doesn't tell someone directly about what's happened to them, there may be other indicators that something is wrong. For example, Spread a Smile representatives may become aware of, or suspect, harm or abuse if they:

- Witness a potentially harmful act (for example, a child being smacked or roughly handled)
- Are told something indirectly by a child, parent or carer or someone else that leads to suspicion of harm or abuse to the child
- See suspected evidence of harm or abuse (for example, an unexplained physical injury)
- Notice a pattern of concerns over time (for example, someone regularly appearing unkempt)

On other occasions you may simply have a 'gut feeling' – it is important that you do not ignore this – instead, speak to a Designated Safeguarding Officer.

## **8. Inclusion, Equity and Anti-Discriminatory Practice**

Spread a Smile is committed to safeguarding that is inclusive, anti-discriminatory and anti-racist. We recognise that racism, discrimination, bias and unequal access to services can affect safeguarding outcomes and will actively seek to identify and address these barriers. We also recognise that some children, young people and families may experience barriers to accessing protection and support due to factors including:

- Disability
- Race or ethnicity
- Culture or language
- Faith or belief
- Gender

- Sexual orientation
- Neurodiversity
- Socio-economic disadvantage

We will seek to understand lived experiences, challenge discrimination and ensure equitable access to support and protection.

## **9. Online Safety and Digital Safeguarding**

Spread a Smile delivers activities both in person and through digital channels. Safeguarding arrangements apply equally to online and face-to-face delivery.

Online risks may include:

- Online grooming
- Cyberbullying
- Exposure to inappropriate content
- Online sexual exploitation
- Harmful online challenges<sup>2</sup>
- Hate content
- Self-harm and suicide-related content
- Coercive control and exploitation through digital platforms
- Deepfake imagery and videos
- AI-generated harmful or misleading content

All representatives must follow organisational guidance relating to:

- Professional boundaries
- Use of personal devices
- Photography and recording
- Social media
- Digital communications with beneficiaries

## **10. Roles and Responsibilities**

All representatives must:

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<sup>2</sup> Activities or trends that spread through social media, messaging apps, or online communities and encourage children and young people to take part in actions that may be dangerous, risky, harmful, or illegal.

- Complete required safeguarding training.
- Read and follow this policy and associated procedures.
- **Recognise** possible signs of abuse, neglect, exploitation or harm.
- **Respond** appropriately and without delay.
- **Record** concerns accurately and promptly in line with procedures.
- **Refer** concerns immediately to the Designated Safeguarding Lead (DSL) or DSO.
- Maintain appropriate professional boundaries, including online.
- Contribute to an open safeguarding culture where concerns are taken seriously and acted upon.

### Professional boundaries

It is vital that all staff maintain relationships that are strictly professional with the people who access our services. As per the employee and entertainer code of conducts (See Employee and Entertainer Handbooks), staff must not:

- Accept gifts or money from patients/families
- Offer gifts of any kind to patients, except for those expressly agreed with Spread a Smile prior to entertaining children
- Make promises and/or visit patients, or their families in their own home
- Invite patients or their families to visit their home
- Give out any personal contact details or social media handles to patients or their families.

We understand that working with children and families who are experiencing distress can sometimes provoke emotional responses and the desire to be as supportive and helpful as possible. However, failing to maintain relationships that are strictly professional can result in confusion and misunderstandings, and lead to children and families, as well as the people working with them, being placed in vulnerable situations.

As such, maintaining professional relationships with the people who use our services safeguards them and us (both as individuals and as an organisation).

### **Trustees**

Trustees have overall responsibility for ensuring that the charity has effective safeguarding governance, policies, resources and oversight, leadership of which may be delegated to a Trustee Safeguarding Lead. Operational safeguarding responsibilities may be delegated but trustees retain ultimate responsibility for ensuring the charity fulfils its safeguarding duties.

Where a safeguarding matter is, or may be, a serious incident, the trustees will consider whether it must be reported promptly to the Charity Commission. Responsibility for ensuring that an appropriate report is made remains with the trustees, although preparation and submission may be delegated. A report to the Charity Commission does not replace referrals to the police, local authority or any other relevant agency.

Trustees will receive proportionate safeguarding assurance, including information about incidents, themes, risks and learning in CEO reports. Personal information will be shared only where necessary and appropriate

**A Trustee Safeguarding Lead should:**

- Provide a sounding board for DSLs and DSOs to consider the most appropriate course of action to take where there is a safeguarding concern
- Support the DSLs and DSOs to use local procedures appropriately (e.g. for referral or escalation)
- Ensure all trustees are up to date with safeguarding training
- Ensure that appropriate safeguarding policies and procedures are in place
- Undertake ongoing monitoring and reviewing to ensure that safeguards are being implemented and are effective
- Support DSLs and DSOs if an incident has occurred.

**Designated Safeguarding Officers (DSO) / Leads (DSL)**

Designated and lead safeguarding officers must model and promote an effective safeguarding culture within the organisation by acting in accordance with this policy. They must ensure that all staff and representatives are aware of how to prevent and respond to safeguarding concerns and ensure that staff receive relevant training and any other information / support to assist with safeguarding. They must also work in partnership with external agencies to effectively manage referrals and share operational information with trustees. The DSL will seek advice and make referrals to the relevant agencies in accordance with the nature and circumstances of the concern. These may include Children's Social Care, Adult Social Care, the LADO, police, DBS and Charity Commission. Different thresholds and reporting requirements apply to each agency.

The DSL is responsible for:

- Providing safeguarding advice.
- Managing safeguarding concerns and referrals.
- Maintaining safeguarding records.
- Liaising with statutory agencies.
- Ensuring safeguarding learning is embedded across the organisation.

**11. Safeguarding Records and Information Sharing**

Spread a Smile maintains secure and confidential records of safeguarding concerns, disclosures, decisions and actions taken. Safeguarding information will be recorded promptly, accurately and factually and stored securely with access restricted to those who need the information to fulfil their safeguarding responsibilities.

Information will be shared only where necessary, proportionate and lawful, including where there is a need to protect a child, young person or adult at risk, or where required by law.

Safeguarding records will be retained and disposed of in accordance with the organisation's Data Protection Policy, Data Retention Schedule and applicable data protection legislation, including the UK GDPR and Data Protection Act 2018.

## 12. Responding to and reporting safeguarding concerns

- **If someone is in immediate danger: call 999, follow emergency-service advice and immediately inform a DSL or DSO.**
- **For all other concerns:** report the concern immediately to a Visit Manager, DSL or DSO. Concerns must never be left unreported because information is incomplete or the person is uncertain whether harm has occurred.
- **If someone tells you about abuse or harm:** listen, remain calm, do not promise confidentiality, ask only enough to clarify, record facts and do not investigate.
- **What the DSL or DSO will do:** assess, record, refer and liaise with relevant agencies.

|                                                         |                                          |                                                                                      |
|---------------------------------------------------------|------------------------------------------|--------------------------------------------------------------------------------------|
| Laura Walter<br>Director of Services                    | Designated Safeguarding Lead<br>(DSL)    | 07908721163<br><a href="mailto:laura@spreadasmile.org">laura@spreadasmile.org</a>    |
| Roxane Caplan<br>Director of Strategy and<br>Operations | Designated Safeguarding Lead<br>(DSL)    | 07957 631142<br><a href="mailto:roxane@spreadasmile.org">roxane@spreadasmile.org</a> |
| Jennie Walton                                           | Designated Safeguarding Lead<br>(DSL)    | 07490 710949<br><a href="mailto:jennie@spreadasmile.org">jennie@spreadasmile.org</a> |
| Ellen Walker<br>Head of Family Support                  | Designated Safeguarding<br>Officer (DSO) | 07428 202243<br><a href="mailto:ellie@spreadasmile.org">ellie@spreadasmile.org</a>   |
| Fiona Hikmet<br>Trustee                                 | Trustee Safeguarding Lead                | 07790 906243<br><a href="mailto:fionahikmet@gmail.com">fionahikmet@gmail.com</a>     |

Do not investigate or ask leading questions. Questions should be limited to those necessary to clarify what the person has said. See Appendix 1 for examples.

Any concern, allegation or disclosure involving a member of staff, volunteer, trustee, contractor or other representative must be reported immediately to a Designated Safeguarding Lead. Where the concern relates to a DSL, it must be reported to another DSL and the CEO. Where it relates to the CEO, it must be reported to the Chair of Trustees or Trustee Safeguarding Lead. Where it relates to a trustee, it must be reported to the Chair of Trustees or, if the Chair is involved, to another trustee authorised to act. External safeguarding advice must be sought where appropriate.

Staff, volunteers and trustees who have safeguarding concerns about the conduct of colleagues or organisational practice may raise concerns through the Whistleblowing Policy if they feel unable to use normal reporting routes.

## 13. Information Sharing and Record Keeping

Spread a Smile recognises that effective safeguarding depends on timely and appropriate information sharing.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information where this is necessary to safeguard children or adults at risk.

Information-sharing decisions will always seek to balance privacy rights with the need to protect individuals from harm.

Safeguarding records will be accurate, factual, stored securely and retained in accordance with data protection requirements and organisational retention schedules.

#### **14. Safer Recruitment**

Spread a Smile is committed to safer recruitment practices and will:

- Undertake appropriate DBS checks.
- Verify identity and references.
- Assess suitability to work with children.
- Provide safeguarding induction and training.

#### **15. Learning, monitoring and review**

Spread a Smile will promote a culture of learning and improvement by:

- Reviewing safeguarding concerns and incidents.
- Monitoring trends and themes.
- Learning from feedback, concerns and near misses.
- Updating training and policy guidance where required.
- Reflecting on emerging safeguarding risks and developments.

This policy will be formally reviewed annually or sooner if:

- Legislation changes.
- Statutory guidance changes.
- Significant safeguarding incidents identify learning.
- Organisational changes necessitate review.

The effectiveness of safeguarding arrangements will be monitored by the Designated Safeguarding Group and Board of Trustees' Safeguarding Lead.

#### **Appendix 1: Asking open questions**

It is not your responsibility to investigate or verify concerns of harm or abuse. However, you may need to ask questions to clarify the information you have been given (e.g. "you've told me that you're hungry because you haven't had any breakfast today or tea last night, have I understood that right?"; or "can see you have a bruise on your leg, how did you get that?").

However, any questions should be limited to ensuring you have understood. Asking further questions, specifically asking leading questions (e.g. "did your brother do this?"; or "Did someone hurt you?") can seriously impact any subsequent investigation or legal action.

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<sup>i</sup> Or any approved digital platform