BAMBA Safeguarding – Vulnerable Beneficiaries Policy

Reviewed: June 2025
Next Review Due: June 2026

Purpose

This policy outlines BAMBA's commitment to safeguarding vulnerable individuals who may engage with our work, and our responsibility to act in ways that uphold their rights, dignity and wellbeing.

Our Position

While BAMBA does not directly provide services to individuals, we recognise our broader responsibility to promote safe, inclusive, and ethical practices across the mindfulness field.

We are especially mindful of the potential vulnerabilities of some groups, including but not limited to individuals with protected characteristics as outlined in the Equality Act 2010.

We are committed to:

- Upholding the principles of equality, dignity, and non-discrimination.
- Promoting safe and ethical teaching and practice through our standards and guidance.
- Encouraging a culture of awareness and care within our community.

Definition of Vulnerable Beneficiaries

We understand "vulnerable beneficiaries" to include anyone who may be at greater risk of harm, disadvantage or exclusion due to age, disability, mental health, socio-economic status, or other protected characteristics.

Our Approach

BAMBA does not deliver direct services but does engage with members, partner organisations, and the public. Our safeguarding commitment is delivered through:

- **Good Practice Guidelines** for mindfulness teachers, which promote ethical and trauma-sensitive approaches.
- **Ethics and Brand Policy**, which sets expectations for respectful, inclusive behaviour.
- **Complaints and Concerns Process**, enabling concerns to be raised safely and fairly.
- **Training and Signposting**, where appropriate, to support organisations or individuals in understanding best practice in safeguarding.

Governance and Responsibilities

BAMBA's trustees hold overall responsibility for ensuring this policy is reviewed and applied appropriately. Where needed, external safeguarding advice may be sought.

Any serious concerns raised to BAMBA will be handled with care, following our complaints procedure and with reference to relevant safeguarding legislation and authorities.

Monitoring and Review

This policy will be reviewed annually or in response to changes in law, guidance or organisational scope. Trustee oversight is required for all updates.

Safeguarding approach in detail

Section 1

BAMBA acknowledges that some of the people we work with and those associated with them may be at risk from harm, abuse and neglect. BAMBA is fully committed to safeguarding children, young people and adults who come in to direct contact with the organisation. Although BAMBA does not provide services directly to children and young people, the organisation has a very wide reach and those accessing its services will have children e.g. children of members who are mindfulness teachers, trainers and supervisors.

BAMBA is dedicated to working in partnership with other local and national agencies to ensure robust safeguarding practice and to demonstrate the organisation's commitment to safeguarding those at risk who access the organisations services directly or indirectly.

We will continually monitor and review our Safeguarding Policy and procedures for reporting concerns and making referrals and always where there has been a disclosure. New policy and procedures will be developed in the light of this ongoing process.

The BAMBA trustees, staff team and volunteers are all required to keep their safeguarding practice up to date and are expected to access specialist support as and when required. Safeguarding practice relates to the way in which everyone connected with the organisation integrates safeguarding into the activity they undertake on behalf of the organisation. This will include taking part in training to increase knowledge, develop skills and raise awareness, engaging in discussion and reflection about how this policy is implemented in practice, as well as processes for reviewing the policy and procedures in the light of changes to legislation and developments in good practice.

BAMBA recognises that safeguarding responsibilities and protecting those at risk is a governance priority for all charities and is fundamental to operating as a charity for the public benefit.

BAMBA recognises its internal duty of care to staff, trustees and volunteers and this policy covers situations where there is/may be a risk of harm, abuse or neglect to a person within the organisation.

BAMBAs board of trustees has ultimate responsibility for safeguarding and the organisation understands that The Charity Commission will hold trustees to account if things go wrong and will check that trustees followed their guidance and the law. BAMBA also understands that trustees are also expected to take responsibility for putting things right.

Section 2

Legislative Background

Safeguarding is about protecting children and adults from abuse or neglect and educating those around them to recognise the signs and dangers. BAMBA is committed to sharing responsibility for wellbeing with those individuals who have needs for care and support and their carers.

The legislation that underpins this policy includes:

- 1989 The Children's Act
- 2004 The Children's Act
- 2014 The Social Services & Wellbeing (Wales) Act
- 2014 The Care Act (England)
- 2014 Adult Support & Protection (Scotland) Act
- 2014 Children & Young People (Scotland) Act
- 2007 Safeguarding Vulnerable Groups (Northern Ireland) Order
- 1998 Human Rights Act

Definition of "At Risk"

An "adult at risk" is an adult over the age of 18 who:

- Is experiencing or is at risk of experiencing abuse or neglect.
- Has needs for care and support (whether or not the local authority is meeting any of those needs); and
- As a result of those needs us unable to protect themselves against the abuse or neglect or risk of it

A "child at risk" is a child under the age of 18 who:

- Is experiencing or is at risk of experiencing abuse, neglect or other kinds of harm;

and

- Has needs for care and support (whether or not the local authority is meeting any of those needs)

BAMBA will operate its Safeguarding Policy and procedures in accordance with the relevant regional legislative framework, with awareness of possible cross-boundary issues, e.g. where a person may live in one region but attend a course, retreat, training course or be in supervision in another.

Section 3:

Safer Recruitment

BAMBA will seek to recruit all paid staff using appropriate procedures, safeguards and checks. A range of measures will be used to screen out people who are unsuitable for working within the organisation and / or the field more broadly.

For salaried staff and trustees:

- The recruitment process for BAMBA is based on a CV and letter of application.
- Gaps in work/life/career history are checked out at interview.
- Interviews panels use a consistent list of questions which ask about values as well as skills and which are asked to each applicant.
- References, right to work and qualification evidence are always requested, and these are checked for genuineness.

We will identify whether any roles are eligible for enhanced Disclosure and Barring Service (DBS) checks. A role can meet the eligibility criteria for an enhanced DBS check by the contact required in the role with those we serve and where there is an identified risk when working with vulnerable individuals.

We will ensure that everyone within the organisation has access to the Safeguarding Policy and Procedures and training as required.

We will review our recruitment procedures in response both to changes in legislation and changes in systems external to our organisation e.g. the Disclosure and Barring Service. All paid staffing roles within the organisation will include a probationary period, personal development support as required, and ongoing line manager reviews.

Section 4:

Volunteers

BAMBA treats volunteers fairly and on an equal footing with paid staff. Volunteers will be provided with a clear role description and will be offered support in order to enable them to fulfil their role within the organisation. Volunteers are required to abide by the BAMBA volunteering contract and to work within defined role boundaries.

Requirements for DBS checks apply to volunteers in the same way that they do to paid workers. There are currently no roles within the organisation that would require a volunteer to work with children.

Section 5:

Safeguarding Officer & Other Contacts

Safeguarding Officer

Stephanie Unthank-Latter

(07712420441) – director@bamba.org.uk

Trustee Chair

Sophie Sansom

s.sansom@bangor.ac.uk

The Safeguarding Officer will have access to appropriate training to support them in the role. They will also:

- liaise with appropriate local and national agencies and ensure a formal safeguarding report is submitted to the relevant authority when appropriate.
- receive feedback from the relevant department within 7 working days from submitting a safeguarding report, or seek same, and action as appropriate.
- contribute to the development of appropriate policy and procedures.
- maintain records and keep confidentiality.
- adhere to and promote this Safeguarding Policy within the organisation.
- support or provide access to support for any individual suffering harm, abuse or neglect.

The Safeguarding Officer will be available to staff, volunteers and any individual in contact with the organisation who has a concern about any aspect of safeguarding.

The Safeguarding Officer will attend relevant training provided by national umbrella organisations (e.g. WCVA) and access support from specialist staff within these organisations. BAMBA will continually review Safeguarding Policy and Practice and peer support will be promoted.

Section 6:

Awareness of harm, abuse and neglect

BAMBA recognises that harm, abuse and neglect can be experienced by trustees, staff, volunteers and individuals in contact with the organisation.

Harm is caused by accidents, deliberate abuse (physical, sexual, emotional/psychological and financial) neglect (deliberate or not) or factors such as bullying, prejudicial attitudes or a failure to enable an individual to participate in activities that are open to most of their peers. All incidents of harm to any individual in contact with the organisation will require an appropriate response to safeguard the individual and to reduce risks. Deliberate acts of harm (physical, sexual, emotional/psychological and financial), exploitation and neglect are abuses against the person and BAMBA is committed to fully undertaking the responsibility to act on any information that relates to harm, abuse and neglect to any individual. This responsibility includes passing information on to the following relevant organisations:

- social services
- the police
- other professional bodies e.g. NSPCC
- the DBS (where appropriate)

Section 7

Suspected Incidents of Abuse, Harm and Neglect

BAMBA recognises that although it does not have a duty to investigate, it has a responsibility to inform external agencies in cases of suspected abuse, harm and neglect. Where suspected incidents of abuse, harm and neglect occur, BAMBA trustees, staff, and volunteers are expected to:

- act in a timely manner.
- take reasonable steps to ensure the safety of those affected, ensuring that these steps do not compromise their own safety or jeopardise any future investigation by statutory agencies.
- maintain confidentiality and exercise caution to ensure that they do not endanger any individual further (e.g. by alerting the alleged perpetrator)

- report the facts to the Safeguarding Officer.

BAMBA acknowledges its legal duty to take action where a Safeguarding Incident has occurred. A Safeguarding Incident Report will be submitted where a Safeguarding Incident has occurred and where there is:

- a need for immediate action because an individual at risk of or suffering from harm, abuse or neglect.
- a need to inform external agencies about abuse, harm and neglect.

BAMBA recognises the importance of prevention in safeguarding. Safeguarding Concerns will be recorded where there is a cause for concern and where there is:

- a need for action because an individual is vulnerable.
- a need to prevent a situation from escalating.
- a need to inform someone within the organisation about the potential for abuse, harm and neglect to occur.
- a need to address poor or inappropriate practice which could result in harm to others.

BAMBA will monitor and review Safeguarding Concerns raised within the organisation to continually develop and disseminate good practice and will adapt its policy and procedures where necessary.

The Safeguarding Officer, along with trustees, staff, and volunteers, must be prepared to seek guidance and support from appropriate individuals and agencies – both internal and external to the organisation e.g. NSPCC practitioners helpline: 0808 800 5000

Section 8

The Role of the Board of Trustees

BAMBA recognises that the board of trustees are ultimately responsible for safeguarding and that this is a key part of their governance role.

At least one board member will be delegated specific responsibility for safeguarding. In addition, the board has tasked safeguarding responsibilities to a designated Safeguarding Officer. The designated board member will meet with the Safeguarding Officer and/or the Executive Director regularly to review policy and procedures and to reflect and share learning that arises from safeguarding practice within BAMBA.

Safeguarding is a standing item on the agenda for BAMBA trustee board meetings as at February 2026. The board will be alerted if there is a Safeguarding Incident and are responsible for making a Serious Incident report to the Charity Commission, as required by charity registration.

https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

BAMBA recognises that trustees must be subject to recruitment and communication processes that ensure the board of trustees is made up of people who are appropriate to make welfare decisions about children and/or adults at risk.

Section 9

Confidentiality & Consent

All reports are kept confidential and held securely according to BAMBAs Data Protection Policy and Privacy Policy until or unless it is necessary to share this material with the agencies named above. BAMBA recognises that it has a responsibility to share relevant information to prevent harm to an individual or to assist in the prevention or detection of a crime. Information is shared within the organisation on a need-to-know basis only. Those reporting Safeguarding Incidents or recording Safeguarding Concerns are required to maintain confidentiality whilst the Safeguarding Officer is responding to the issues raised.

BAMBA recognises that it is best practice to gain consent from the parent/carer or child of sufficient understanding to report a Safeguarding Incident involving a child ONLY where this will NOT place the child at further risk of harm. In any situation where gaining consent about a child or from a child with sufficient understanding is not possible, the reasons for this must be fully documented.

For adult safeguarding, BAMBA will assume that the adult has the capacity to make decisions for themselves unless this has been assessed otherwise, and therefore has the right to be asked for, or to withhold, their consent.

Consent should therefore be obtained to report a Safeguarding Incident involving an adult unless:

- a crime has been committed.
- the situation, if not reported, would put other people at risk of similar abuse, e.g. if the suspected perpetrator is known to be working with other people who are at risk or vulnerable in similar circumstances.
- the individual is subject to undue influence (possibly from the perpetrator or a person with an interest in protecting the perpetrator) pressure or coercion which discharges them from giving consent.

In any situation where gaining consent about an adult is not possible, the reasons for this must be fully documented.

Section 10

Communication

BAMBA considers that safeguarding is everybody's business and will disseminate this policy and associated procedures to all trustees, staff, volunteers and any individuals in contact with the organisation and their families and carers.

The policy will be included as part of induction for all trustees, staff, and volunteers. Beneficiaries of the organisation will be made aware of this policy and procedures in welcome letters and at the start of any activity or membership. Beneficiaries will also be informed about what action will be taken by the organisation, including in a situation where a report needs to be made to another agency. The policy will be published on the BAMBA website.

The Safeguarding Officer will always consult the trustees with responsibility for Safeguarding before a making decision to report a Safeguarding Incident to an external agency.

Section 11

Responding to Allegations against a Person within the Organisation

BAMBA recognises that there may be rare occasions when an individual in contact with the organisation may have concerns about inappropriate conduct by a member of the BAMBA Trustee Board, the staff team, or a volunteer. The person raising the concern must discuss their allegations with the Director and / or the Safeguarding Officer (contact details in section 5) and **not** address the member of the BAMBA trustee board, the staff member, or volunteer directly.

In circumstances where an individual is concerned about the conduct of the Director, the person raising the concern must discuss their allegations with the Safeguarding Officer or appointed Trustee.

Immediate steps must be taken to ensure the safety of the people affected, these steps must not compromise the safety of the person making the allegation or jeopardise any future investigation by statutory agencies.

Disciplinary procedures are in place to address the allegations made against a trustee, staff member, or volunteer with BAMBA, which can include immediate suspension without prejudice. These procedures have been developed to ensure fairness to the individual against whom the allegations have been made, whilst protecting those at risk and maintaining their safety.

BAMBA recognises that there may be some circumstances where a report to an external agency such as social services (where there has been a Safeguarding Incident) or the police (where a crime has been committed) is necessary. BAMBA will cooperate fully

with any such investigations and will provide factual and relevant information as required.

Section 12

Whistleblowing (Disclosure in the Public Interest)

Whistleblowing is making a report in the public interest (Public Information Disclosure Act 1989) where there is wrongdoing, risk or malpractice.

BAMBA encourages trustees, staff, and volunteers to report any practice that:

- doesn't seem right.
- is illegal.
- represents negligence in undertaking their duties, leading to a risk of putting another individual's health and safety in danger.
- appears to be covering up wrongdoing in any way.

In the first instance, they should speak to the Safeguarding Officer. Although BAMBA would prefer trustees, staff, and volunteers to use internal processes for making a report wherever possible, this does not prevent them from making a report or referral to social services, the police or the NSPCC (if appropriate) in their own right as a private individual.

Guidance on protection and support for employees who blow the whistle appropriately within an organisation can be found via the charity Prevent: https://protect-advice.org.uk/

See also, BAMBAs separate whistleblowing policy

Section 13

Special Considerations

BAMBA conducts activities on an ongoing basis. The activities of the organisation include, but are not limited to, the following:

- Face to face events hosted by BAMBA
- Face to face events hosted by a third party
- Online events hosted by BAMBA
- Online events hosted by a third party

At the start of any BAMBA hosted event, we will always take the time to offer reflection on any support that might required to individuals attending.

Section 14

Other Related Policies

The following BAMBA policies and procedures link to this Safeguarding Policy:

- Discipline and Grievance Policy
- Data Protection Policy
- Privacy Policy
- Equality Diversity and Inclusion Policy
- Complaints Procedure
- Serious incident
- LinkedIn closed group

APPENDIX 1: Safeguarding Process

The flow chart below outlines the process for initial recording, reporting and actions following a Safeguarding Concern or Incident.

A Trustee, staff member, volunteer completes and submits a BAMBA safeguarding report to record either:

a Safeguarding Concern*

or a Safeguarding Incident*

The BAMBA safegaurding report is emailed to the

Safeguarding Officer

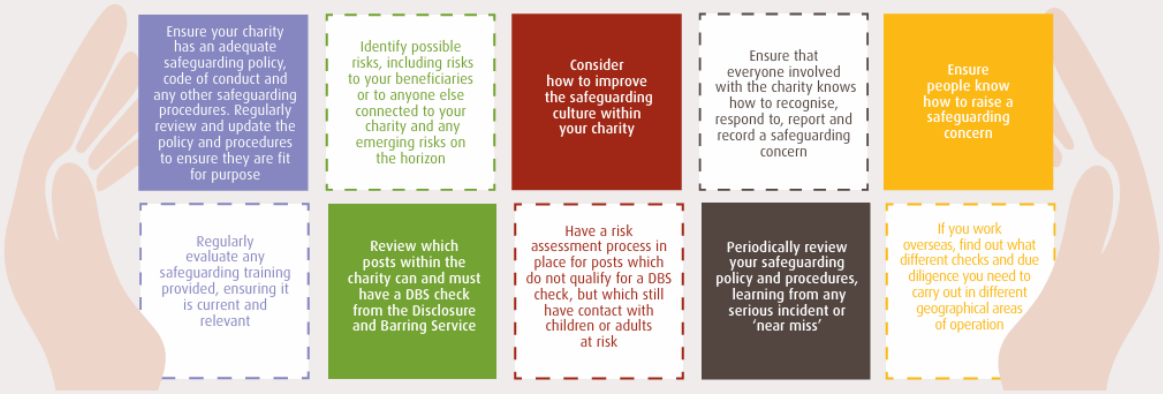
The Safeguarding Officer makes contact with the reporter within 24 hours of the report, to establish whether a concern is being raised or an incident is being reported and what action is needed. The Safeguarding Officer then liaises with the Trustee Chair and if necessary, other BAMBA staff

The Safeguarding Officer records actions and ensures they are reported to the Trustee Board at the next meeting. Any urgent actions are reported to the Chair of Trustees prior to the meeting by the Safeguarding Officer and / or Executive Director.

The Safeguarding Officer and / or Executive Director discuss the incident, actions and process. Any relevant learning is disseminated to the staff team and Trustees by the Safeguarding Officer and will be used to inform future iterations of BAMBA Safeguarding Policy and Proceedures

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Safeguarding should be a key governance priority for all charities



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