



# **Pernicious Anaemia Society**

## **Safeguarding Policy**

*Date Policy approved: 16<sup>th</sup> February 2026*

*Next review Date: February 2027*

*This document should be read in conjunction with Safeguarding Lead Policy and Procedures.*

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## **Policy Statement**

PAS believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, sex, race, religion, ethnic origin, sexual orientation, marital or gender status.

## **Scope of the Policy**

This Safeguarding Policy and the associated procedures apply to all individuals involved in PAS including participants, trustees, staff, and volunteers and to all concerns about the safety of adults and children whilst taking part in our organisation and its activities.

Trustees, staff and volunteers should follow the guidelines in the staff handbook however they can also access the Safeguarding Lead (See Procedures for the Safeguarding Lead) Some of our members may be 'adults at risk' or "children at risk" and voice their concerns to either a member of staff, trustee or a volunteer. There are aspects to these definitions:

### **An adult who:**

- has needs for care and support
- is experiencing, or at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

### **A child who:**

- is experiencing or is at risk of abuse, neglect or other kinds of harm; and
- who has needs for care and support

## **Purpose**

This policy aims to cover:

- The legislation, our commitment and procedures for safeguarding adults and children.
- Our role and responsibility for safeguarding adults and children
- What to do or who to speak to if someone has a concern relating to the welfare or well-being of the members of PAS, trustees, staff and volunteers

## **Implementation**

We have undertaken to

- Use safe recruitment practices for trustees, staff and volunteers via our:
  - Staff Handbook
  - Policy for recruitment and preparation of volunteers
  - Policy for recruitment and preparation of trustees
  - Risk policy and register
  - Have codes of conduct for trustees, staff and volunteers and keep a record to show that all trustees, staff and volunteers have seen and understood these codes and agree to follow them
- Have a designated Safeguarding Lead who has undertaken appropriate training
- Communicate the PAS policies and procedures:
  - Staff Handbook made available on the website
  - All PAS policies and procedures made available on the website in our members section or on request by third parties
  - Have a standing agenda item on safeguarding and protecting people from harm at trustee meetings
- Have a procedure for the Safeguarding Lead to follow
- Have a commitment to ensuring that adult and child safety is included in regular risk assessments
- Have regular updates for trustees, staff and volunteers to include identifying different types of harm and abuse, and how people may be affected and how they carry out their safeguarding responsibilities
- Regularly review digital risk
- Indicate on all policies and procedures when they were written, approved by the trustees and when they are due for a review

## **Legislation**

This refers to key legislation for the United Kingdom. Should a member from another country voice a concern the Safeguarding Lead will consult and seek advice on the legislation relevant to that country as appropriate.

Relevant Acts and links below:

### **Adult safeguarding**

Sexual Offences Act 2003 : [Sexual Offences Act 2003](#)

Mental Capacity Act 2005 : [Mental Capacity Act 2005](#)

Safeguarding Vulnerable Groups Act 2006, Deprivation of Liberty Safeguards and Liberty Protection Safeguards : [Safeguarding Vulnerable Groups Act 2006](#)

And [Mental Capacity \(Amendment\) Act 2019: Liberty Protection Safeguards \(LPS\) - GOV.UK](#)

The Care Act 2014: [Care and support statutory guidance - GOV.UK](#)

Disclosure & Barring Service 2013: [DBS Update Service - GOV.UK](#)

Equality Act: [Equality Act 2010](#)

The Domestic Abuse Act 2021: [Domestic Abuse Act 2021](#)

The Counter-Terrorism and Security Act 2015: [Counter-Terrorism and Security Act 2015](#)

**Child safeguarding**

Children Act 1989: [Children Act 1989](#)

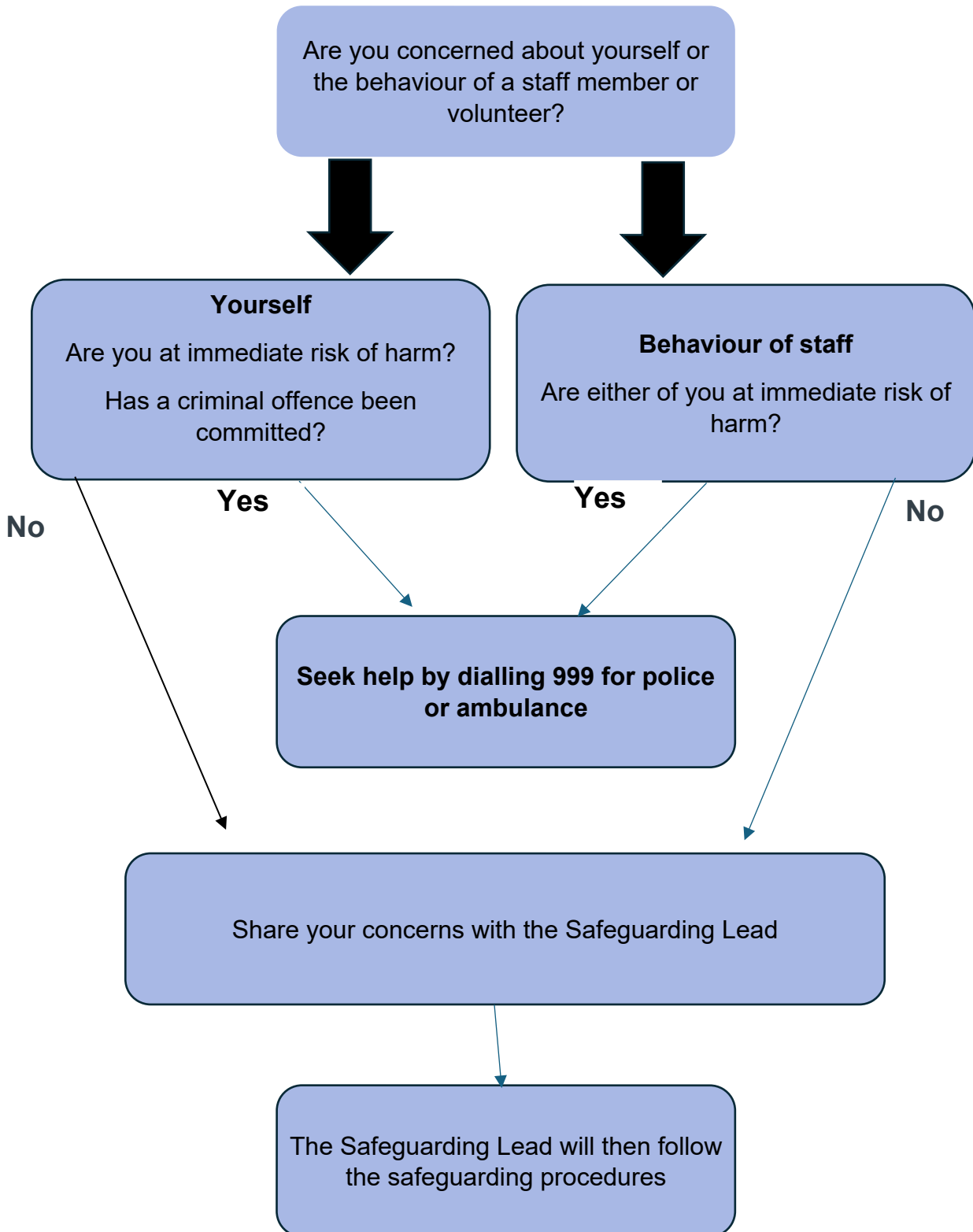
The Children Act 1989 guidance and regulations:

Children Act 2004: **[Children Act 2004](#)**

Children and Young People (Scotland) Act 2014: **[Children and Young People \(Scotland\) Act 2014](#)**

Working Together to Safeguard Children: [Working together to safeguard children 2023: statutory guidance](#)

## Raising and Managing a Concern





## **Pernicious Anaemia Society Safeguarding Policy**

### **Whistleblowing**

To help PAS operate with honesty and integrity the Charity is committed to upholding and providing information about staff rights to make qualified and protected disclosures (whistleblowing). The Charity expect all staff to maintain high standards and foster a culture of openness and accountability to prevent situations which may include illegal or unethical conduct.

Whistleblowing disclosures relate to suspected wrongdoing or dangers at work and should be in the public interest and may be a disclosure about:

- |  |   |
|--|---|
| a) Criminal activity                           | f) Bribery  |
| b) Miscarriages of justice                     | g) Financial fraud or mismanagement                   |
| c) Danger to health & safety                   | h) Deliberate concealment of any of the above matters |
| d) Damage to the environment                   |   |
| e) Failure to comply with any legal obligation |   |

Concerns relating to suspected wrongdoing should be reported to the CEO in the first instance; if for any reason this is not possible, then the report should be given to one of the Trustees.

All allegations will be investigated thoroughly, fairly and in an appropriate way; information about the investigation should be treated sensitively and confidentially.

There must be no threatening or retaliatory behaviour against those who make whistleblowing disclosures. Such conduct may result in disciplinary action.

*See also the Anti-Fraud & Whistleblowing Policy.*

## **Recording and Information Sharing**

The Pernicious Anaemia Society holds three types of information which are covered by this policy:

**Organisational Information** – this is mostly information which is publicly available but can also contain some personal information.

**Personal Information** – including the names, addresses and job titles of members of the Society and perhaps their families and friends.

**Sensitive Personal Information** – this will usually be information about any employees or volunteers. However, the Society acknowledges and recognises that it can hold sensitive information about other people, including Trustees, Members and Visitors to any meetings or seminars or to any offices occupied by the society. An example of this would be that the dietary requirements at the Annual General Meeting might allow a person's religion to be deduced, or the sexual orientation of a person might be disclosed by the person on the society's online forum.

The Pernicious Anaemia Society will hold information only for specific purposes. It will inform data subjects that their personal information is held to:

- a. Communicate with the data subject any information relating to the Society, developments in the diagnosis and treatment of Pernicious Anaemia or any other relevant information that would be of interest to the data subject.
- b. Analyse the demographic and geodemographic incidence of Pernicious Anaemia.
- c. Know the number of members of the Society.

No information about members will be kept once it is no longer required for its stated purpose.

The Pernicious Anaemia Society will strive to ensure that the information that it holds about data subjects is accurate by ensuring that data subjects can update the information held about them.

Further information can be found in our Data Protection Policy.