

Conservative Party Safeguarding Policy

March 2022

Contents

1. Purpose	3
2. Scope	3
3. Definition	3
4. Policy	5
5. Ownership	12
6. Related Documents and Policies	12
7. Related Legislation	12
8. Audit	12

Key Personnel

Designated Safeguarding Lead	Scott Grace	Safeguarding@Conservatives.com	020 7984 8040
Safeguarding Officer	Jasbir Singh	Safeguarding@Conservatives.com	020 7984 8040



Conservative Party Safeguarding Policy

1. Purpose

- 1.1 The Safeguarding Policy expresses the Party's commitment to the protection of children, young people and vulnerable adults in any activities carried out in its name.
- 1.2 The Policy is part of the Party's commitment to diversity, equality and inclusivity. Our approach to safeguarding ensures we:
 - protect and promote the welfare of the children, young people and vulnerable adults who engage with us, whether assisting with or attending Party events and activities;
 - communicate our approach to safeguarding in a clear and transparent way;
 - demonstrate compliance with applicable laws and regulations;
 - have safeguarding responsibilities that are clear so that people understand how to report safeguarding concerns.
- 1.3 We strongly believe that everyone, regardless of their age, background, ability, culture, disability,

gender, language, religious beliefs or sexual identity has the right to protection from abuse.

2. Scope

- 2.1. **The Policy applies to all members, employees, candidates and elected representatives whilst engaging in activities on behalf of the Party and its affiliated groups. (herein known as Stakeholders).**

3. Definition

- 3.1. The following terms have the following meanings in this Safeguarding Policy and any additional guidelines:

Adult:	means a person who is 18 years of age or above.
Affiliated Group:	means a specialist group of Party members as authorised by the Party Board.



Party Board/the Board:	means the Board of the Conservative Party as it is defined in the Party Constitution.
Child/Young Person:	means a person who is under 18 years of age.
Conservative Party/Party:	means the Conservative & Unionist Party.
Culture:	means a culture of safeguarding.
Designated Safeguarding Lead (DSL)	means the person who takes the lead on Safeguarding within the Party.

Conservative Party Safeguarding Policy



Discrimination:	means unlawful discrimination. Unlawful discrimination can occur when a person is treated wrongly because of one or more of their “protected characteristics” including disability, age, race, colour, sex, religion and sexual orientation.
Harm:	<p>includes physical and mental ill treatment; self-harm; and neglect; or unlawful conduct which adversely affects a person’s property, rights or interests.</p> <p>It is possible to cause harm intentionally, to cause harm through negligent or reckless behaviour or through ignorance of the law.</p> <p>An adult at risk of harm is defined as someone who has need for care and support, and is experiencing, or is at risk of, abuse or neglect and is unable to protect themselves.</p> <p>Being subject to harm in some way includes:</p> <ul style="list-style-type: none"> ● Ignoring or inadequately meeting medical or physical needs; ● Failing to provide access to appropriate health and social care services;

	<ul style="list-style-type: none"> ● Not providing basic necessities such as clean clothes, food, baths, medication, heating, lighting, a safe living area etc; ● Not addressing risks to protect someone sufficiently.
Incidents:	means any incident including any behaviour that leads a Stakeholder reasonably to believe or suspect that an individual is harmed or is at risk of harm.
Individual:	means an individual person who is either a child, young person or a vulnerable adult.
Policy:	means this Safeguarding Policy.
Safeguarding:	means protecting individuals from harm and taking prompt and effective action when harm has occurred or there is a risk of it occurring, both as far as is reasonable and fair to expect and is also possible.
Safeguarding Officer(s):	means the person, or persons, in the Conservative Party responsible for implementing this Policy and for investigating any reports made under it.

Senior Volunteer:	Member of the Voluntary Party elected at Area, Regional and/or Board Level.
Stakeholder:	means all members, employees, candidates and elected representatives who engage on behalf of the Party and its affiliated groups.
Vulnerable adult: <i>(sometimes known as an ‘adult at risk’)</i>	<p>means a person who is 18 -years of age or above and who is unable to protect themselves against significant harm or exploitation. Every person has to be considered on an individual basis. People who are termed as vulnerable might have:</p> <ul style="list-style-type: none"> ● a learning disability; ● mental health issues; ● substance misuse problems; ● a long-term illness or chronic condition; ● a physical disability.



Conservative Party Safeguarding Policy

3.2. How to use this document

- To understand the Policy, who it applies to, when it applies and where – see part 1
- To understand your practical obligations when dealing with individuals offline – see part 2
- To understand your practical obligations when dealing with individuals online – see part 3
- Dealing with disclosures – see part 4
- Reporting concerns – see part 5

4. Policy

4.1. Part 1: This Policy

4.1.1 The Conservative Party is a national political party governed by its Constitution. The work and related activities of the Conservative Party principally involve only adults. Much of its work and activities are only appropriate for, and of interest to, adults. Some of those adults may be vulnerable adults who will fall within the scope of this Policy. Occasionally the work and activities of the Party may involve children and young people, who will fall within the scope of this Policy.

This Policy is therefore relevant to every stakeholder of the Party and every Stakeholder is bound by it.

4.1.2 Commitment to Safeguarding

The Conservative Party is committed to ensuring that every Stakeholder, while engaged in its work and activities, safeguards children, young people and

vulnerable adults.

This document lays out the ways in which the Conservative Party will meet this commitment.

4.1.3 To whom does the Policy apply?

Every Stakeholder as defined on page 4, including non-individual entities such as Conservative Associations.

However, the Policy does not apply to individuals and entities over whom the Party has no control or power to implement this Policy.

4.1.4 When does the Policy apply?

The Policy only applies when and while those to whom the Policy applies carry out or perform work or activities in the name of the Conservative Party, or any of its subdivisions or affiliated groups, formally recognised by the Party Board.

4.1.5 Where does the Policy apply?

Anywhere within the jurisdiction of the United Kingdom where work or activity in the name of the Conservative Party occurs.

4.1.6 Dates

This Policy:

- comes into force on 1 September 2021;
- replaces and revokes all previous Safeguarding Policies;
- will be reviewed at least once annually or upon significant organisational or legal changes occurring, if earlier.

4.2. Part 2: Practical Application of the Policy

4.2.1 The most effective and enduring ways to practise safeguarding is to adopt a culture whereby Stakeholders acknowledge and respect children, young people and vulnerable adults without unlawful discrimination. This is a continuous and evolving process. The Party commits to improving the culture it has already adopted.

4.2.2 The Party expects all its Stakeholders to exercise the principles of common sense and decency towards all children, young people and vulnerable adults. These are fundamental Conservative values. Detailed below are some of the activities we engage in that should be considered within the scope of this Policy, although this list is not finite.

4.2.3 **Non-Online work and activities where there may be children, young people and/or vulnerable adults in attendance.** *Practical examples (which are not a complete list)*



Conservative Party Safeguarding Policy

Association AGMs	Association fundraising events	Campaigning including knocking on doors	Leafleting – administrative preparation and delivering through letterboxes	Social events (including in private homes)
Driving children, young people or vulnerable adults	Being driven by a young person	Community events such as litter-picks or gay pride where the Party is represented in some way	“Meet your MP” and similar events	Undertaking “Connect Calling” (telephone research calls) where others may or may not be present
Party activity where non-Party guests might be invited	Events where a guest who is a young person accompanies a member.	An event where alcohol is served	An event including administrative tasks where children, young people or vulnerable adults have access to IT equipment owned or controlled by the Party or on which there are Party accounts	Any situation where there is likely to be verbal or physical abuse directed at members and activists such as marches and demonstrations



4.2.4 Different duties arise if you are (a) an organiser in charge of work or an organiser of an activity (“an organiser”) or (b) if you are not (“an attendee”).

4.2.5 Every job or activity must have an organiser or a person responsible for it. That person must be an identifiable adult. That adult must be responsible for implementing the Policy and undertaking a risk assessment at the time. Who that will be is often a matter of common sense. For example, it could be the organiser of a canvass session or a fundraiser. However, the organiser must make sure those taking part are aware of who has overall responsibility of the work or activity. If no-one takes responsibility, the activity and associated work **is not permitted** by the Party and all those who engage in it are liable to disciplinary action.

4.2.6 Organisers & Responsible Persons

An organiser or responsible person is someone who is responsible for the work or activity, and therefore for the implementation, of this Policy.

While the work or activity is in progress, and when there are children, young people or vulnerable adults involved, for each such individual, the organiser must:

Conservative Party Safeguarding Policy

- ensure that parents, carers and, where possible, the individuals themselves, are made aware of this Policy and know how to access the contents. A copy of the Policy should be made available on request.
- prior to any event taking place which may include vulnerable adults, young people or children, undertake a suitable risk assessment including reference to the safeguarding of such individuals.
- where the child or young person is unaccompanied by a parent or carer, obtain any written parental or carer consent, before the individual's attendance, plus parental or carer contact numbers. Be prepared to say no to attendance where no consent is in evidence (see 4.2.7). Where a vulnerable adult is unaccompanied, written parental or carer consent should be obtained where applicable.
- ensure that a mobile phone is available during the event to call the emergency services, parents or carers. Inform the parent or carer immediately of any incidents or accidents involving the individual.
- complete an Incident Reporting Form for any incident or accident involving children, young people or vulnerable adults.
- ensure, whenever possible, that more than one adult is present with anyone

who falls within the scope of this Policy and who requires safeguarding. When this is not possible, the person who requires safeguarding should remain visible at all times.

- where it is necessary for a vulnerable adult, young person or child (a) to be in a vehicle and (b) unaccompanied by a parent or carer, then more than one responsible adult should be present in the vehicle with them. No-one must be alone with a child, young person or vulnerable adult in a moving or stationary vehicle.
- parent or carer consent should be obtained for a vulnerable adult, young person or child to travel in a vehicle in connection with Party activities. This consent must be given in writing which can be completed on paper, or electronically.
- ensure that no pictures, images, photographs or other recordings are made of individuals without first obtaining written parental or carer consent and where possible establishing that the individual consents to the making of such pictures and recordings. This should be undertaken in line with the Guide on photography in the Campaign Toolkit.
- ensure that only people who are legally allowed to drink alcohol do so.
- ensure that swearing and using

obscenities, using sexual or violent language, racist, sexist or similarly offensive language, or being unduly aggressive or otherwise abusive to others does not take place.

- as a matter of common sense, never take individuals into places or situations where there is real risk of harm or danger.
- challenge, whenever it is safe to do so, any conduct by adults that are believed to be breaches of this Policy.
- stand up for any child, young person or vulnerable adult who is being harmed or about to be harmed, including whenever possible taking them out of harm's way. If you observe harm please refer to the Reporting section of this Policy.
- report any conduct that they consider breaches this Policy to the Organiser or make a formal report (see 4.5).

4.2.7 How to use consent forms

Written consent is obligatory whenever a child, young person or a vulnerable adult attends Party work or activity without a parent or carer. The consent is given by the parent or carer. They are consenting



Conservative Party Safeguarding Policy

to the individual attending/participating in the work or activity without them. To do that meaningfully, they have to know what the work or activity involves and what the child, young person or vulnerable adult is likely to experience in it. Preferably and usually a consent form should be used. In an emergency, or if circumstances exist where consent forms are simply not realistic other forms of written consent can be used, such as a WhatsApp message. However, the rule that must always be followed is the obtaining of written consent.

Organisers must make sure:

- when describing what work or activity consent is being asked for, that the details are as accurate and frank as possible about what the work/activity entails and about any risks there may be.
- There must be one form for each individual (if required), even if there is a group of individuals.
- Both the parent/carer and also when possible the individual, indicate credibly that they understand what they are consenting to.
- A copy of the signed and dated consent form must be kept safely for 12 months in line with the demands of the Data Protection Act 2018. Alternative appropriate consent in the form of WhatsApp, text, etc should also be kept.

4.3. Part 3: Online work and activities where there are children, young people and vulnerable adults in attendance

- 4.3.1 This Policy also applies to online activity and work in the name of the Conservative Party. This could, for example, involve online chats and groups and email correspondence as well as Social Media, video-based meetings and so on.
- 4.3.2 It is beyond the scope of this Policy to set out all the legal requirements on parents, carers and others about the general use of personal data and exposure of children, young people and vulnerable adults to online content. This includes regulatory and contractual obligations required by online platforms. The Conservative Party expects its stakeholders to behave with common decency and common sense, as well as to obey the law, and to make sure that they understand and keep such regulatory and contractual obligations.
- 4.3.3 The Party imposes some specific obligations on everyone. Everyone who engages in activity or work in the name of the Party, must
- only make online contact with children, young people and vulnerable adults for that activity or work and in accordance with this Policy.
 - whenever possible, not communicate with children, young people and vulnerable adults “one to one”. The individual’s parent or carer, or an adult

with the permission from the parent or carer should be copied into correspondence or involved in the activity or work at the same time. When that is not possible, they should be told as soon as possible, afterwards.

- always save a record of all correspondence and interactions for 12 months.
- never disclose non-public or confidential information about the Party or any connected people in any communication with a child, young person or vulnerable adult.
- never share any contact or personal details of a child, young person or vulnerable adult with anyone else without appropriate consent. Personal details include (not a complete list) their name, nicknames, phone numbers, addresses (including electronic addresses and account handles) and photographs. “Sharing” includes making them part of a group on social media, or forwarding their personal data to others, even if the purpose is believed to help them.
- retain (which also means “do not delete”) any records of conversations



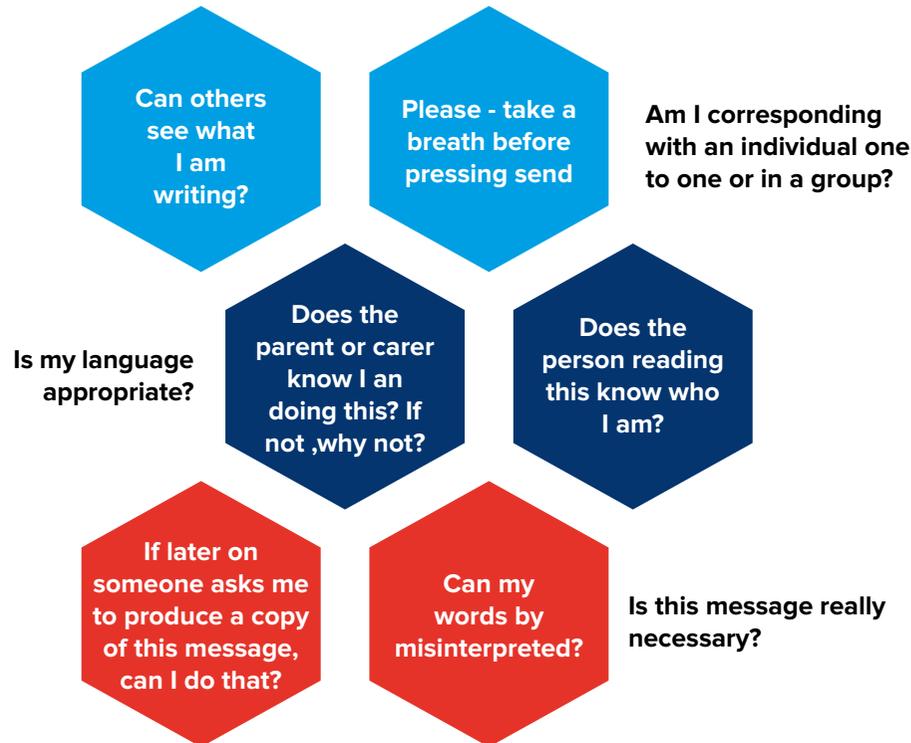
Conservative Party Safeguarding Policy

including voicemail, communications by email or other messaging for 12 months

- not use private messaging facilities on any social media platforms to communicate with children, young people or vulnerable adults.
- not use any platform that deletes content so that communication cannot be retained.
- never use any platform where the sender of a message can remain or appears to be anonymous.
- avoid language that is morally ambiguous, racist or has any sexual or immoral content.
- use language that is age appropriate to the person you are communicating with.
- not reply where a child, young person or vulnerable adult messages privately using any medium it has been advised to avoid or where it appears not to be related to the Party work or activity or where the message is unsolicited. In such cases, tell the carer or parent and report it at once.

4.3.4 Any safeguarding concerns or breaches, or any disclosure received through written or spoken communication, must be reported (see 4.5).

4.3.5 **Suggestions before you send any online message to an individual:**



Conservative Party Safeguarding Policy

4.4. Part 4: Disclosures.

4.4.1 So far, the Policy has focussed on what you have seen or experienced. This section focusses on what you might be told. That is, what may be disclosed to you.

4.4.2 What is a disclosure?

It is what you have been told by an individual. It could be verbal, or you could have been told by a gesture or an action. Disclosures can be deliberate or inadvertent.

Sometimes children, young people and vulnerable adults may tell you something that makes you think that that individual has been harmed or is at risk of harm. The individual may even not think they have been harmed or are at risk.

A disclosure does not have to be connected to you or to the Conservative Party or to any Party work or activity you are involved in for it to be actionable.

It is your responsibility to recognise and report any disclosure and react responsibly to it, using the Incident Reporting Form.

4.4.3 What do I do now?

- React calmly. Do not show alarm. Listen very carefully.
- Take the matter seriously.
- Reassure the individual that they were right to tell you.
- Ensure you have understood as best you can what the individual is telling you.

- Avoid asking questions or quizzing the individual. Avoid interrogation, no matter how well-meaning.
- Record everything you are told either at the time or immediately afterwards in as much detail as you can. For example, you could make a written note or record a voice message on your mobile phone. It is important to let the person who is telling you information that you are making a record of what is said.
- It is not your job to investigate what has happened, “make further enquiries” or sit in judgment. Avoid jumping to unsubstantiated conclusions. You are not in a position to tell the individual that their disclosure amounts to a safeguarding concern. You are, however, in a position to report your concern. Your job is to relay information promptly and accurately.
- Tell the individual that you have a duty to report what you have learned and leave it at that.
- Never tell an individual you will keep any disclosure secret, “between us”, “I won’t tell” and so on, even if asked by the individual to do so.
- Never make any promises of any outcome that might arise from you reporting it.

4.4.4 Then, report it immediately. (See 4.5)

4.5. Part 5: When things go wrong – reporting.

You must report harm or suspected harm of a child, young person or a vulnerable adult if you see or experience it, suspect it, or if it is disclosed to you.

The obligation to report applies to everyone involved in Party work or activities.

In the case of disclosures (see Part 4), it applies to disclosures made whilst engaged in Party work or activities even if the issue disclosed has nothing to do with the Conservative Party at all.

4.5.1 Criminal Behaviour and/or Emergency – Report to the Police & the DSL

If you suspect that a crime is being committed (or may be committed) against a child, young person or a vulnerable adult, or you suspect one is about to take place, or otherwise the individual is about to be or is being seriously harmed, you must tell the police at once.

If you are unsure, err on the side of caution and report it anyway. You should then follow this up with a report to the DSL.

4.5.2 Harming Behaviour and Situations – Report to the DSL

If, in the course of your dealings with children, young people or vulnerable adults, you witness incidents or behaviour that leads you reasonably to believe or suspect



Conservative Party Safeguarding Policy

that a child, young person or adult has been harmed or is at risk of harm, you have an obligation to report your concerns to the DSL. This may include instances where you receive a disclosure from another person (see Part 4 above).

If a disclosure is made to you or if you believe there to be a breach of this Policy, you must report your concerns to the DSL.

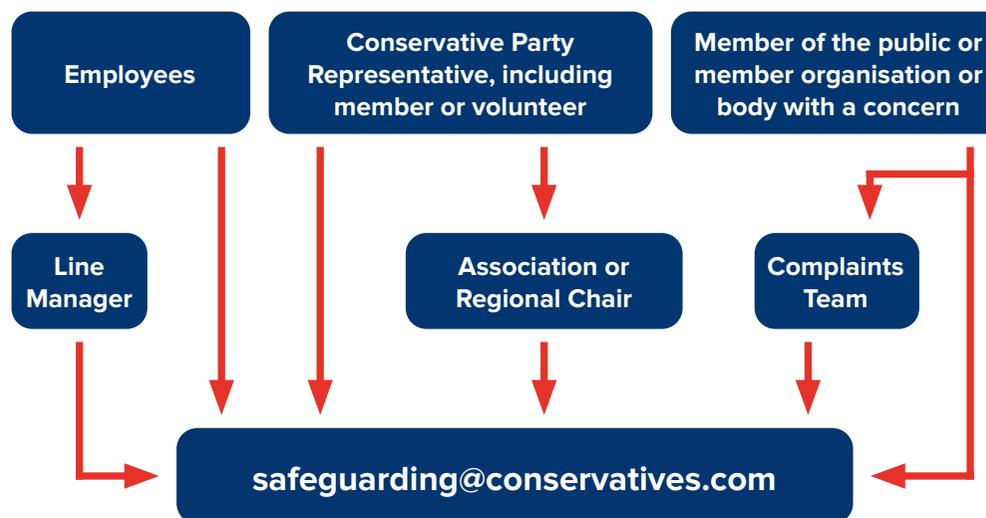
Depending on the circumstances, if you witness inappropriate behaviours you should not rely on post-event reporting but should feel comfortable in speaking out. In that way, all can help to create an atmosphere of trust and; respect and it is good practice. You should also raise concerns with the organiser of the event, or with a senior volunteer (if one is present).

4.5.3 The Party's Reporting Process. How to report an incident or a disclosure

As noted above, any criminal activity (or reasonable suspicion of criminal activity) must be reported to the police, and then to the DSL. Any other concerns can be raised directly with the DSL. The DSL can be contacted by email – safeguarding@conservatives.com

An Incident Reporting Form can be downloaded at [conservatives.com/safeguarding-policy](https://www.conservatives.com/safeguarding-policy) or you can make first contact by email, and the DSL or their team can assist you in completing that report.

Reporting a Safeguarding Concern or Breach



Conservative Party Safeguarding Policy

Report a disclosure in the same way you would report abuse or a safeguarding breach. The diagram above shows how you can report a concern or breach to the DSL.

The DSL will discuss your concerns and (if not already completed) will provide an Incident Reporting Form for you to complete as a written record.

4.5.4 Telephone Reporting

Telephone reporting is permissible only in a real emergency. The number to call in this circumstance is 020 7984 8040.

4.5.5 What happens next?

The DSL, or their nominee, will investigate what you have reported, including reporting the matter to the appropriate authorities where that is necessary. He or she may do this without further notice to you. You should not investigate the matter yourself or discuss the details with anyone else other than the DSL (or the Police in an emergency).

All data collected in this regard will be stored, processed and retained in line with the Data Protection Act 2018 and the Party's data handling procedures.

The Data Protection Act 2018 is not a barrier to sharing information about safeguarding.

From time to time, the Party will review trends and will seek to learn from every incident that is reported to it.

4.5.6 Historic allegations

If an individual wishes to report an historic incident, they should contact DSL in the first instance, following the contact details elsewhere in this Policy.

4.5.7 Anonymous reporting

The Party will accept anonymous reports, but does not encourage them since anonymous reporting limits the ability of the Party to a) gather further information if needed and b) conduct the necessary investigations that will follow. Those making reports, without anonymity, are assured of the Party's commitment to confidentiality and thus the Party encourages people not to make reports anonymously.

5. Ownership

The overall responsibility for the policies and procedures that govern the work of the Party lies with the Party Board.

The DSL is the Policy owner and has direct responsibility for maintaining this Policy and providing guidance and advice on implementation. They are responsible for ensuring that the Policy and procedures reflect the Party's values and commitment to equality and diversity.

All stakeholders must be made aware of this Policy and know how to access it.

It is the responsibility of all Stakeholders to follow policies and procedures, promoting best practice throughout the Party.

6. Related Documents and Policies

Code of Conduct for Party Representatives

The Conservative Party Constitution (Amended January 2021)

Volunteer Code of Conduct

7. Related Legislation

Children Act 1989

Human Rights Act 1998

Sexual Offences Act 2003

Children Act 2004

Mental Capacity Act 2005

Safeguarding Vulnerable Groups Act 2006

Equality Act 2010

The Care Act 2014

Children and Social Work Act 2017

Data Protection Act 2018

8. Audit

This Policy document will be reviewed and audited initially after 6 months of implementation and then every [12] months or following a significant incident or change within CCHQ.



