

Policy title: Safeguarding Adults
Date issued: April 2023, reviewed March 2025, reviewed September 2026
Policy objective: The aim of this policy is to set out the Commission's procedure for safeguarding adults under UK legislation, as well as outlining our safeguarding principles and scope.
Policy owner: Executive Director

Introduction

The US-UK Fulbright Commission recognises the right of every individual associated with the Commission's programmes, to stay safe. At the Commission we are committed to protecting all those at risk of harm and abuse in the Fulbright and wider community with whom we have dealings in the UK, the US and elsewhere internationally as applicable. We have zero tolerance for harm or abuse, and we are alert to the danger that our work may result in individuals being placed in a position of trust and authority which could be open to abuse. We recognise a right to protection from abuse and harm of all at risk individuals with whom the Commission has dealings, regardless of age, disability, ethnicity, gender or gender reassignment, sex, pregnancy, race, sexual orientation, religious belief or civil status. Our culture and values commit us to an environment where incidents and concerns can freely be reported without fear of repercussion or retribution and in the certain knowledge of proper investigation and follow-up.

This policy seeks to ensure that the US-UK Fulbright Commission undertakes its responsibilities regarding protection of adults at risk and will respond to concerns appropriately. The policy establishes a framework to support staff and participants in their practices and clarifies the organisation's expectations.

Safeguarding is about embedding practices throughout the organization to ensure the protection of adults at risk wherever possible and responding to circumstances that arise.

Abuse can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any group, gender, or culture.

It can take several forms, including but not limited to the following:

- Physical abuse
- Domestic violence and domestic abuse
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse

- Organisational abuse
- Neglect and acts of omission
- Self-neglect

This policy also considers online safety, hate crime, sexual exploitation, radicalisation, forced marriage and other acts or threats as part of safeguarding.

Purpose and scope

The purpose of this policy is to:

- protect those adults at risk with whom the Commission has dealings from harm, arising from the conduct of staff, grantees and event participants or from the design and execution of the Commission's programmes, events and activities.
- increase awareness of safeguarding issues, promoting good practice and assisting members of staff and others to make informed and confident responses in relation to safeguarding issues.
- ensure that everyone who is associated with the Commission understands their responsibilities about safeguarding and support them in meeting their safeguarding obligations.
- establish a secure framework for the reporting and investigation of any safeguarding related incidents and subsequent action.

This policy applies to all Commission grantees, event participants, alumni and staff, as laid out in Definitions (Appendix 1), when engaged in work or activities for the Commission, including where those activities are delivered virtually via an online environment. Commission grantees, event participants and staff will be asked to confirm their acceptance of and willingness to adhere to this policy.

The scope of this Safeguarding Policy is broad ranging, and in practice it will be implemented via a range of policies and procedures within the organisation. These include dignity at work, whistleblowing, complaints, etc. Concerns and investigations will be shared with, or referred on to, partner organisations where they do not fall within the scope of the Commission's work or activities, or where safeguarding responsibility is shared.

This policy is made available on the Commission's website for the benefit of our partner organisations and the entire Fulbright Community.

Policy statement

The Commission will adhere to the following practices and values to ensure a robust safeguarding culture.

- Safeguarding is everyone's responsibility: All Commission staff and anyone acting on behalf of the Commission is responsible for Safeguarding. Everyone must be aware of the welfare of any adults at risk of harm or abuse whom the Commission has dealings with and report concerns accordingly.
- The personal safety of all involved: In executing this policy, the Commission will have regard first and foremost to the personal safety, health and security of all involved

- Professionalism, respect and fairness: All involved will be treated professionally and fairly, adhering to best practice, and with respect, including individuals against whom an allegation has been made
- Responsiveness: All allegations and concerns reported under this policy will be taken seriously and dealt with in a timely manner. All safeguarding concerns will be acknowledged within 3 working days.
- Confidentiality and information sharing: Information will be received, gathered, recorded, and stored in accordance with data protection legislation. All staff must be aware that they have a professional duty to share information with other agencies to safeguard vulnerable adults. However, information will be shared on a need-to-know basis only, as judged by the Designated Safeguarding Lead (DSL).
- Adherence to all relevant legislation and Charity Commission pronouncements: The Commission, in applying this policy, will always comply with relevant legislation and industry best practice.
- Training: All staff who, through their role, are in contact with adults at risk of harm or abuse will have access to safeguarding training at an appropriate level.
- Support: We recognise that involvement in situations where there is risk or actual harm can be stressful for those concerned. Staff dealing with safeguarding concerns and those involved will have access to confidential support through our Employee Assistance Programme and DSL.

Monitoring

The Commission will monitor the following Safeguarding aspects:

- Safer recruitment practices including DBS checks where relevant
- Records made and kept of safeguarding supervision sessions
- Training – register/ record of staff training on safeguarding
- Monitoring whether concerns are being reported and actioned
- Checking policies are up to date and relevant
- Reviewing the current reporting procedure that is in place
- Role of the Designated Safeguarding Lead

Reporting and investigating incidents or concerns

To facilitate the reporting and investigation of safeguarding concerns or incidents, the Commission has designated Junaina Pirbhai as its DSL for Adults. Any individual having dealings with the Commission who has any safeguarding concern in relation to Commission business is encouraged to report to the Commission's DSL or Executive Director via the Reporting a Safeguarding Concern Form (Appendix 2) where possible.

DSL Adults: Junaina Pirbhai: Junaina@fulbright.org.uk, 020 7498 4020

DSL Children and Young People: Cristina Picillo, Cristina@fulbright.org.uk, 0207 498 4022
Executive Director and Designated Senior Manager for Safeguarding: Rowena Boddington,
Rowena@fulbright.org.uk 020 7498 4019
Board of Commissioners Safeguarding Lead: boardsafeguarding@fulbright.org.uk

Any concerns sent in by post should be addressed to:
Safeguarding at the US-UK Fulbright Commission
Camelford House, Unit 302, 3rd Floor 89, Albert Embankment, London SE1 7TP

All safeguarding concerns, allegations or reported incidents are to be taken seriously and fully investigated.

Investigations will be pursued as set out below:

- Any allegation or incident which involves only members of staff will be dealt with under this policy. This involves an initial fact-finding risk assessment, preserving safety, and potentially involving external statutory authorities such as the police, local social services, or a Local Authority Designated Officer (LADO). Depending on the investigation's findings, a parallel disciplinary procedure may be initiated.
- Any allegation or incident which involves a grantee but not a staff member and which allegedly occurred on the premises of a host institution will be passed, with any relevant consents, to be investigated in the first instance under the procedures of that host institution.
- In the case that the Executive Director is the subject of a safeguarding allegation, concerns should be reported to the Board of Commissioners Safeguarding Lead, who will conduct the investigation.
- In the case that the Board of Commissioners Safeguarding Lead is the subject of the allegation, a suitable third-party investigator will be engaged.

Upon conclusion of any safeguarding investigation, the Commission will take appropriate action based upon the findings. If an investigation reveals evidence of criminal misconduct, the Commission will involve the Police and other agencies as appropriate. In the situation of reporting to external agencies such as the Police, those involved will be notified and consulted.

Record keeping

Scanned copies or electronic files of safeguarding and incident report forms will be kept in line with our Data Protection Policy. These will be retained for 7 years, after which details will be redacted to show the concern in question and the outcome of the incident.

Associated policies

Children and Young People Safeguarding Policy
Complaints policy
Grantee Code of Conduct

Appendix 1: Definitions

1. By 'Commission' we mean the US-UK Educational Commission, also known as the US-UK Fulbright Commission.
2. A 'child' is anyone who is under the age of 18.
3. An adult at risk' is anyone aged 18 or over who is unable to adequately protect themselves against abuse, exploitation, neglect or mistreatment.
4. By 'safeguarding', we mean the actions taken to protect individuals from abuse, exploitation, neglect or mistreatment including, but not limited to, actions for preventing and responding to harm caused by sexual exploitation, violence, emotional abuse, harassment or bullying.
5. 'Staff' means commissioners, employees (temporary or permanent), volunteers, interns, contractors and consultants or any other person working for or on behalf of the Commission in the UK or overseas.
6. By 'applicant' we mean those individuals who have applied for a Fulbright award or programme either directly to the Commission or via the Institute for International Education (IIE), IREX or World Learning.
7. By 'grantee' we are referring to those individuals whose application for a Fulbright award resulted in a grant which is currently in the process of being paid.
8. By 'event participant' we mean those individuals who have participated in or are participating in a Commission sponsored programme or event
9. By 'alum' or 'alumni' we mean those individuals who have previously been the recipient of a Fulbright award or who have participated in a Fulbright sponsored programme.
10. By 'host institution' we are referring to those educational institutions who are hosting or have hosted a Fulbright grantee.

Appendix 2

Form: Reporting a Safeguarding Concern

US-UK Fulbright Commission

1. This form should be completed for all safeguarding concerns, regardless of perceived severity.
2. This form should be completed as soon after the incident as possible.
3. This form should be emailed to the Designated Safeguarding Lead (DSL) for Adults as soon as possible.
4. The US-UK Fulbright Commission may conduct an investigation.
5. Completed forms will be stored in line with data protection policy.

About you

Your name:	Click or tap here to enter text.	Your title/role:	Click or tap here to enter text.
Your email:	Click or tap here to enter text.	Were you witness to the concern?	☐

Nature of concern:

Safeguarding	☐	Misconduct	☐
Harassment/Bullying	☐		
Accident	☐	Other concern	☐

Safeguarding Concern: Please provide details of the concern you have, including dates, times, descriptions of events, full names and whether the information is first-hand or the accounts of others.

Click or tap here to enter text.

Time and date of concern/becoming aware of concern Don't worry if you can't provide an exact date. Just give some idea of when the incident might have happened. And if you believe this is an ongoing incident, give some idea of how often you think it happens.

Click or tap here to enter text.

Were any of the following contacted?

Social Services	☐	Fulbright staff	☐	Venue management team/staff	☐
Emergency services	☐	Next of kin	☐	Person/people at risk	☐

If you selected any of the above boxes, please provide details of communication.

Click or tap here to enter text.

What action was taken?

Please give as much detail as possible

Click or tap here to enter text.

Any recommendations that you wish to make for future?

Click or tap here to enter text.

FOR OFFICE USE

Staff signature: Click or tap here to enter text.

Date: Click or tap to enter a date.

Actions:

Review risk assessment ☐

Contact social services ☐

Contact next of kin ☐