



**PUNDARIKA UK**

Advancing Buddhist Education in the Drukpa Kagyu and Dzogchen Traditions

# **PUNDARIKA UK**

## **Safeguarding Policy**

## **CONTENTS**

1. Introduction
2. Confidentiality
3. What is abuse?
4. How might we notice abuse?
5. Our Commitment
6. Code of behaviour- for all volunteers
7. Procedures
8. Information Sharing flow chart
9. Guiding principles
10. Vetting Process for Trustees and Volunteers
11. Risk Assessment Process for non-DBS Roles
12. Safe Record-Keeping and Data Protection Policy
13. Residential Retreat Events
14. Useful contacts – local and national
15. Record of Concern

People designated for safeguarding:

1) Onsite person designated for safeguarding (Designated Safeguarding Person/DSP) Matt Hart and Erica Whitfield

2) Chair of the board of Trustees: Jason Upton

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Date of policy review: 1<sup>st</sup> August 2026

## 1. Introduction

Safeguarding and Public Protection

The policy applies to all projects that Pundarika UK supports and all events that Pundarika UK holds, and to all trustees, employees and volunteers (or anyone working on behalf of) of Pundarika UK.

The trustees of Pundarika UK recognise their responsibility to safeguard the welfare of all children aged under 18 or vulnerable adults and are committed to their protection.

The purpose of this policy is

- To protect children and vulnerable adults that come into contact with Pundarika UK's activities.
- To provide trustees, volunteers and employees with the overarching principles of safeguarding children and vulnerable adults

Pundarika UK believes that children or vulnerable adults should never experience abuse, and we are committed to arranging our activities in a way that will protect them.

We recognise that

- All children and vulnerable adults regardless of age, background, heritage, disability, gender and sexual orientation or religious belief have a right to protection from harm or abuse
- Some children and vulnerable adults are especially vulnerable, for e.g. when separated from their parents or carers
- Staff, volunteers and trustees need to have appropriate safeguarding checks in place.
- LGBT+ individuals may face unique risks and experiences of harm, including homophobia, transphobia, and identity-based discrimination. We are committed to creating a safeguarding environment that affirms the identities and rights of lesbian, gay, bisexual, trans, non-binary, queer, and other LGBT+ people. This includes being

vigilant to the specific ways in which abuse, neglect, or coercion may be experienced in relation to sexuality and gender identity.

- We recognise that safeguarding must take into account intersecting forms of oppression and vulnerability. People's experiences of harm may be shaped by their race, class, gender identity, disability, neurodivergence, or immigration status. We will seek to understand and respond to this complexity with sensitivity and care.

The World Health Organisation defines "Child abuse" as 'all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.'

Pundarika UK is committed to protecting people attending UK retreats from harm and abuse. We will also ensure that all staff and volunteers work together, in line with this safeguarding policy, and act promptly when dealing with allegations or suspicions of abuse or inappropriate behaviour.

### **SAFEGUARDING IS EVERYBODY'S RESPONSIBILITY**

We will work together to prevent and minimise the risk of abuse or harm. If we have concerns that someone is at risk being abused or harmed our first duty is to the child or adult concerned.

### **DOING NOTHING IS NOT AN OPTION**

If we know or suspect that someone is at risk, we will respond and ensure our concerns are properly recorded. We will respond according to this policy and other local procedures.

### **IF YOU HAVE ANY CONCERNS –TELL SOMEONE**

## **2. Confidentiality**

Pundarika UK is committed to respecting the right to confidentiality of everyone in the UK sangha. Sometimes it is necessary to share information to ensure a person's wellbeing, for example, sometimes practical information needs to be shared with the staff team. Occasionally, sensitive information may be shared in this way. Such sharing will always be kept to the minimum required.

### 3. What is abuse?

Abuse is a violation of an individual's human and civil rights by any other persons or group of people. Abuse may be single or repeated episodes. It is not only harming somebody; it also includes neglect of their basic needs or failure to protect them from harm. Examples include:

**Physical:** for example, hitting, slapping, pushing, restraining or uninvited touching.

**Psychological and emotional:** for example, shouting, swearing, frightening, blaming, ignoring or humiliating a person, threats of harm or abandonment, intimidation, verbal abuse.

**Financial:** including the illegal or unauthorised use of a person's property, money or other valuables, pressure in connection with wills, property or inheritance.

**Sexual:** such as forcing a person to take part in any sexual activity without his or her informed consent.

**Discriminatory:** including racist or sexist remarks or comments based on a person's age, race, sex, national origin, disability, pregnancy, marital status, sexual orientation, medical condition or illness, and other forms of harassment, slurs or similar treatment. This also includes stopping someone from being involved in other cultural activity, services or support networks.

**Institutional:** the collective failure of an organisation to provide an appropriate and professional service, especially to vulnerable people. This includes a failure to ensure the necessary safeguards are in place to protect people and maintain good standards of care in accordance with individual needs, including training of staff, supervision and management, record keeping and liaising with other providers.

**Misuse of spiritual authority or power.** This can take the form of all the abuses listed above. Furthermore, all forms of abuse have the potential to cause damage to the individual's emergent spirituality. Holding a spiritual position or role involves differing power relationships and imbalances and these need to be recognised to respect the autonomy or rights of the individual.

Some abuse is **spiritual** abuse because of the context it occurs in or where it invokes status as a teacher or someone of higher spiritual authority, or uses religious teachings to coerce or manipulate people into performing behaviours which meet the needs of the abuser rather than those of the individual concerned. In some cases, it may be well intentioned rather than malicious, but nevertheless is harmful, as it overrides the respect of an autonomous individual's rights to make informed choices regarding their own lives and spiritual practices, for example due to fear, shame, humiliation etc.

Some abuse is spiritual abuse because of the context it occurs in. This includes conversion practices — any attempt to change or suppress someone's gender identity or sexual orientation through spiritual, therapeutic, or coercive means. These practices can cause deep harm, especially when they override the autonomy, dignity, or embodied experience of the individual under the pretext of moral or spiritual 'correction'.

## 4. How might we notice harm or abuse?

Concerns about or evidence of abuse or harm can come to us through:

- A direct disclosure by the person concerned.
- A complaint or expression of concern by staff, a volunteer, another centre guest, a carer, a member of the public or relative.
- An observation of the behaviour of the person at risk.

**It is important that volunteers, retreat users and members of the public know who to contact if there are any safeguarding concerns at Pundarika UK. How to access relevant information and who to contact will be available on a notice board on the retreat premises and on the website.**

## 5. Our commitment

**Pundarika UK is committed to:**

- Identifying abuse and harm.
- Responding effectively to concerns and formal complaints.
- Creating a safe space for everyone at Pundarika UK events.
- Regularly monitoring and evaluating the effectiveness of our policies, procedures and practices for protecting people.
- Ensuring that our policies, procedures and practices stay up to date with good practice and the law in relation to safeguarding.

Pundarika UK will use various channels for informing everyone about who are the designated safeguarding persons and how to contact them, along with how to access this policy.

Retreat users and guests are entitled to respect and protection from harm. We aim to give everyone a positive and rewarding experience. The team will aim to respond and offer support in such circumstances. However, it is important for retreat users to appreciate the limits of the staff and volunteers' role, time and skills. On some occasions we will suggest that suitable professional support is required.

### **Statutory and legal responsibilities**

There may be serious incidents, involving children under 18 or 'adults at risk of harm' (previously referred to as 'vulnerable adults'). In these cases, there may be a statutory or legal requirement to inform the local authority and other relevant agencies to ensure protection from significant harm or abuse.

(An adult at risk is defined as a person aged 18 years or over, who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.)

This policy covers not only children and adults at risk, but also everyone at Pundarika UK. However, the response to any incident may vary according to the legal and statutory guidance for different groups

## **6. Code of behaviour for staff, teachers and volunteers with respect to visiting children and other retreat users**

### **Avoid:**

- Spending time alone or making unnecessary physical contact with children or adults at risk.
- Using incorrect pronouns or chosen name. Where unsure, ask respectfully or use gender-neutral terms until the individual clarifies.
- Arranging private meetings of students with retreat teachers anywhere other than in Pundarika's designated meeting areas.
- Non-consensual touching in general.
- Meeting alone with children and adults at risk associated with Pundarika UK, outside of the work environment.
- Investigative questioning after an allegation or concern has been raised. Instead, listen with an open mind in a caring manner. Then record the information and report it to the designated safeguarding person, who will notify the appropriate authorities if required.

### **You should never (even in fun)**

- Initiate or engage in sexually provocative conversations or activity
- Allow the use of inappropriate language to go unchallenged
- Make jokes or remarks about someone's gender, sexuality, or pronouns.
- Do things of a personal nature for children or adult at risks that they can do themselves
- Trivialise or exaggerate child or adult at risk abuse issues
- Allow any allegations made by a child or adults, centre users or staff, to go without being reported and addressed
- Make promises to keep any disclosure confidential from relevant authorities

**Regarding all relationships within and around Pundarika UK events:**

Respect everyone's right to privacy.

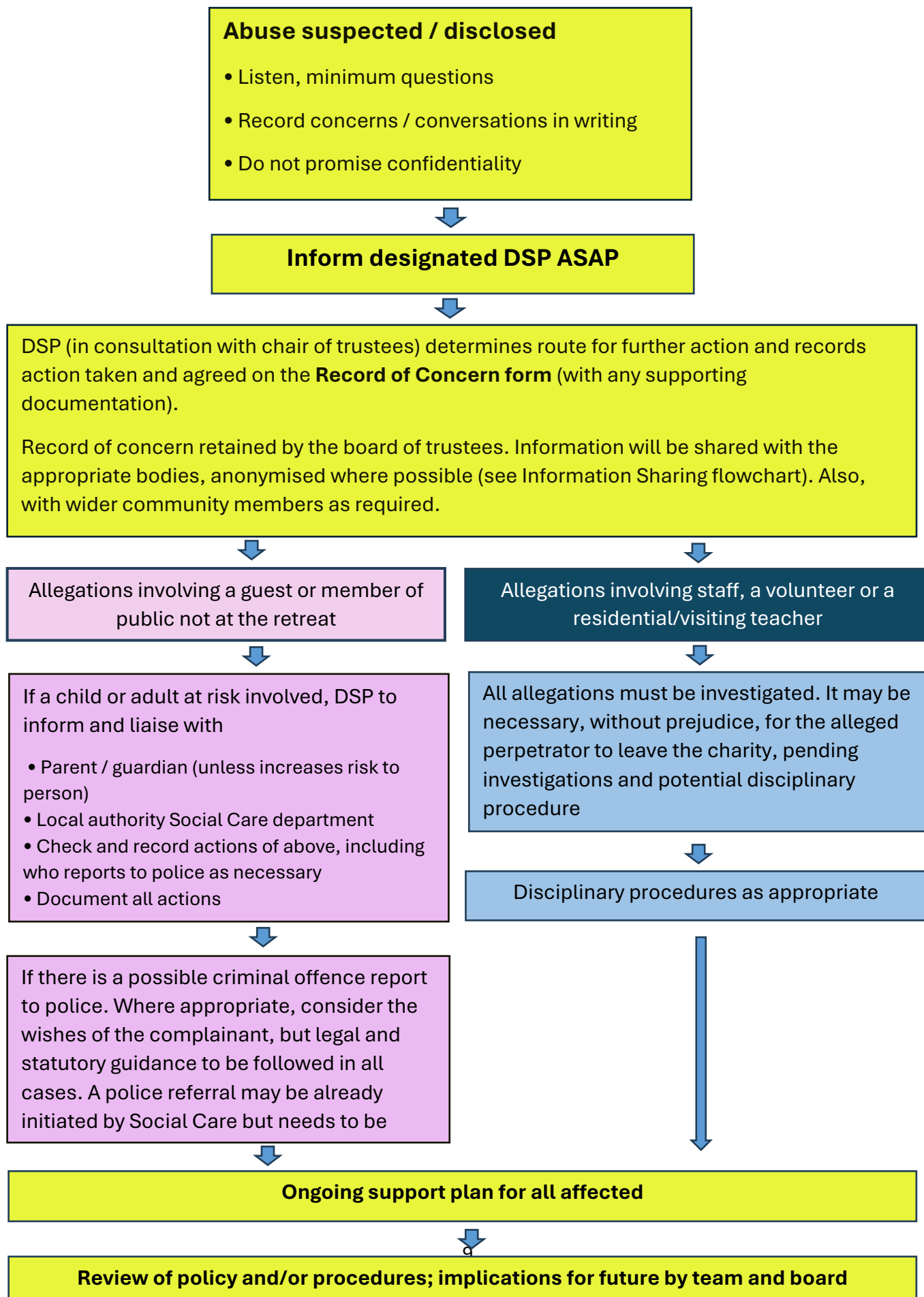
- Help create a culture in which Retreat users, volunteers, and children feel able to report experiences of harmful uncomfortable attitudes or behaviour.
- Act with discretion with regards to your personal relationships. Ensure your personal relationships do not undermine harmony or impact on your capacity for impartiality.
- Use inclusive and affirming language that respects each person's gender identity and expression. This includes using the correct name and pronouns, and avoiding assumptions about gender, sexuality, or family structure.
- Be aware that conflicts of interest can arise, leading to misunderstandings. This can happen particularly where there is an imbalance of power or close personal relationship. Where such potential situations arise, one should discuss this with the director and possibly the trustees as relevant.
- Be aware of the procedures for reporting concerns or incidents and how to contact the designated safeguarding person.
- Should you find yourself the subject of inappropriate affection or attention from a child or retreat user, it is essential to share this with a designated safeguarding person.
- Report any concerns to one of the designated safeguarding people. If neither is available tell another responsible person at the retreat event.
- Maintain appropriate boundaries with others at Pundarika UK. Be aware of the scope of your role and when necessary, pass information to those whose role it is to deal with specific matters.
- Be careful not to give personal or dharma advice to individuals that goes beyond your expertise or role. Respond with empathy and kindness, rather than being drawn in to giving expert advice.
- Read and abide by the Pundarika UK Code of Conduct Policy.





## Pundarika UK Safeguarding Policy

### 7. Procedures flowchart





## Pundarika UK Safeguarding Policy

### 8. Information sharing during / following an investigation

#### **DSP shares information as soon as possible in conjunction with Chair**

- If it is the DSP who is the subject of the allegation, the responsibility passes to the Chair of Board of Trustees.
- Action is taken to fulfil legal and statutory requirements and to protect anyone who may be at risk of being harmed.

#### **Board of trustees**

Anonymised information given to enable the board to fulfil their safeguarding responsibilities as required by the Charities Commission. Trustees must also manage and minimise the risk of further incidents happening as far as this is reasonably possible, by supporting any necessary changes to policies, procedures and work practices. Inform **Insurance Company** if required

#### **Pundarika UK DSL**

If an allegation is made about the chair, a trustee, dharma teacher an ordained sangha member, the responsibility passes to the DSL.

**Charities Commission** informed in the following circumstances:

- If beneficiaries of Pundarika UK (adults or children) have been, or alleged to have been, abused or mistreated while under the care of the charity, or by someone connected with the charity, for example a trustee, staff member or volunteer.
- If there has been an incident where someone has been abused or mistreated (alleged or actual) and this is connected with the activities of the charity.
- If there has been a breach of procedures or policies at the charity which has put beneficiaries at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or adults



## Pundarika UK Safeguarding Policy

### 9. Guiding principles

- Prioritise the wellbeing and safety of all who reside, visit or come into contact with the Pundarika UK events.
- Never promise to keep anything reported confidential. It should be explained at the outset that any disclosure will be shared internally or with external agencies as required. However, the person's privacy will be respected as much as possible.
- For the purposes of recording, it is important to listen. Questions, however, should be kept to the minimum necessary to understand what is being alleged, and leading questions avoided. (The use of leading questions can cause problems for any subsequent investigation and court proceedings.)
- All those involved should take great care in reaching conclusions and making decisions. Regarding sharing information within Pundarika UK, confidentiality and privacy of all the individuals concerned should be protected as appropriate and feasible. When the process is complete, consideration should be given to what is appropriately shared with the wider Pundarika UK community.
- Whatever action you may have to take, and even if the authorities are involved, don't lose sight of the person or persons at the centre of the concern.
- Ensure that there is someone to whom they can turn for support after any allegation or investigation. If they give further information, then go through the process of listening and recording as already described.
- When dealing with adults at risk, their wishes, feelings and mental capacity must be taken into account and people should be supported to make their own decisions and encouraged to give informed consent when possible and safety considerations permit.
- Be aware that although the particular individual that has disclosed abuse may now be safe and protected, it is important to think about the potential risk to others from the alleged perpetrator. If the matter is serious, inform the appropriate agencies as required, but also pass information to those who may need be aware in order to protect others, such as the Designated Safeguarding Lead or the Director of Pundarika UK, or in their absence to a trustee of the charity.
- It is important to think carefully how best to maximise everyone's rights to privacy as much as is feasible. There will be people with whom information needs to be shared. In many cases this could be anonymised, and the person's name only be shared with



## **Pundarika UK Safeguarding Policy**

those where this is essential. Consider carefully what is shared by email, particularly bearing in mind GDPR considerations, and again anonymise where feasible or encrypt and password protect documents with names of alleged perpetrators and those who have been harmed.

- PUK events organiser's need to make clear decisions to promote wellbeing and safety of all they come into contact with. However, it is important to maintain equanimity towards all those involved in any allegation and at the same time ensure robust safeguarding procedures. Respect and compassion need to be shown to both the person harmed and the alleged perpetrator, and where appropriate and feasible, care and support given.

### **9A. Safeguarding Training and Support**

To ensure that safeguarding practice at Pundarika UK is informed, consistent, and inclusive, all staff, trustees and volunteers will receive appropriate safeguarding training prior to or as part of their induction. This training will include:

- Understanding the different forms of abuse, including spiritual abuse and discriminatory abuse.
- Recognising identity-based forms of harm, including those related to sexuality, gender identity, and conversion practices.
- Using inclusive and respectful language, including correct name and pronoun use.
- Responding to disclosures sensitively and appropriately, including maintaining clear boundaries and respecting autonomy.
- Knowing when and how to report concerns in accordance with this policy.

Safeguarding training will be refreshed at regular intervals. Designated Safeguarding Persons (DSPs) and trustees responsible for safeguarding will be supported to undertake additional training appropriate to their role.

## **10. Vetting Process for Trustees and Volunteers**

Pundarika UK is committed to ensuring the safety and wellbeing of all individuals involved with our charity. As part of our safeguarding efforts, we conduct thorough vetting procedures for all prospective trustees and volunteers before they assume their roles. The vetting process includes:



# **Pundarika UK Safeguarding Policy**

## **1. References**

Applicants must provide at least two professional or character references. These references should attest to the applicant's integrity, reliability, and suitability for a role within a safeguarding environment.

## **2. Employment and Volunteering History**

A comprehensive review of the applicant's job and volunteering history will be conducted to assess relevant experience and identify any gaps or concerns.

## **3. Identity Verification**

All applicants must provide valid identity documents, including but not limited to:

- Passport or UK driving licence
- Proof of address (such as a utility bill or bank statement)
- Right-to-work documents, if applicable

## **4. Disclosure and Barring Service (DBS) Checks**

All prospective trustees and volunteers must undergo a Disclosure and Barring Service (DBS) check. The level of DBS check required will depend on the role and level of engagement with vulnerable individuals.

## **5. Overseas Background Checks**

For applicants who have lived or worked outside the UK, additional overseas criminal record checks will be required. Where necessary, they may need to provide a police clearance certificate or similar documentation from relevant authorities.

Pundarika UK takes safeguarding seriously and reserves the right to decline applicants if concerns arise during the vetting process. By implementing these measures, we uphold our commitment to creating a safe and secure environment for all individuals involved with our charity.

## **11. Risk Assessment Process for Non-DBS Roles**

Pundarika UK is dedicated to ensuring the safety and wellbeing of all individuals involved with our charity. While some roles may not meet the criteria for a Disclosure and Barring Service (DBS) check, they may still involve contact with children and adults, such as helpers at the



## **Pundarika UK Safeguarding Policy**

retreat. To maintain a robust safeguarding framework, we implement a structured risk assessment process for such positions.

### **1. Role Evaluation**

Each role will be assessed to determine:

- The nature and frequency of contact with children and adults.
- The level of responsibility and oversight required.
- Any potential safeguarding risks associated with the role.

### **2. Supervision & Safeguarding Protocols**

To mitigate risks, Pundarika UK implements safeguarding measures such as:

- Ensuring that individuals in non-DBS roles are always supervised when working with children or vulnerable adults.
- Establishing clear boundaries and guidelines for interaction.
- Providing safeguarding training to ensure awareness of best practices.

### **3. References & Employment History**

All applicants for non-DBS roles must provide at least two professional or character references. Additionally, a review of the applicant's work and volunteering history will be conducted to assess suitability for the role.

### **4. Identity Verification**

Applicants must present valid identification documents, such as:

- Passport or UK driving licence.
- Proof of address (e.g., utility bill or bank statement).
- Right-to-work documents, if applicable.

### **5. Continuous Monitoring & Reporting**

- Regular check-ins and performance evaluations will be conducted to ensure compliance with safeguarding protocols.
- All staff and volunteers must report any safeguarding concerns immediately, following Pundarika UK's reporting procedures.
- Risk assessments may be periodically reviewed and updated based on emerging safeguarding needs.

By implementing this risk assessment process, Pundarika UK reinforces its commitment to creating a secure and supportive environment for all individuals, ensuring safeguarding remains a top priority.



# **Pundarika UK Safeguarding Policy**

## **12. Safe Record-Keeping and Data Protection Policy**

At Pundarika UK, we are committed to safeguarding personal data and ensuring compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Our approach to record-keeping and data security is designed to protect sensitive information while maintaining transparency and accountability.

### **1. Principles of Data Protection**

All personal data handled by Pundarika UK must be:

- Used lawfully, fairly, and transparently.
- Collected for specific, explicit, and legitimate purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up to date.
- Stored securely and retained only as long as necessary.
- Protected against unauthorized access, loss, destruction, or damage.

### **2. Secure Storage of Records**

To ensure the security of records:

- Physical records must be stored in locked cabinets with restricted access.
- Digital records must be encrypted and stored on secure servers with access controls.
- Data transfers must be conducted using secure methods such as VPNs, encrypted emails, or secure file transfer protocols (SFTP).
- Regular audits will be conducted to assess compliance with security measures.

### **3. GDPR Compliance and Accountability**

Pundarika UK will:

- Maintain a record detailing the purpose and categories of data processed.
- Ensure that all trustee's and volunteers handling personal data receive training on GDPR compliance.
- Implement access controls to prevent unauthorised data access.
- Ensure that records are securely disposed of when no longer needed.

### **4. Handling Data Breaches**

In the event of a data breach:



## **Pundarika UK Safeguarding Policy**

- The incident must be reported immediately to the trustee's safeguarding leads and the Chair of the Trustees.
- A risk assessment will be conducted to determine the impact.
- If necessary, affected individuals and the Information Commissioner's Office (ICO) will be notified.

By adhering to these principles, Pundarika UK ensures that personal data is handled responsibly, securely, and in compliance with legal requirements.

### **13. Young People attending residential retreat events**

#### **Residential retreat events**

A 16–17-year-old on a residential retreat event advertised more generally for adults must be accompanied by a parent/guardian and, preferably, share a room with their parent/guardian.

If that is not acceptable to the parent/guardian and teenager, the teenager could be in a single room, if possible, adjoining the parent/guardian's room.

If not accompanied by their own parent/guardian, the teenager could be accompanied by an adult friend appointed by the parent/guardian as their carer for the event, in which case Pundarika UK must obtain a written agreement made personally between the parent/guardian and the carer referring specifically to the event, and the carer and teenager should share a room, or sleep in adjoining rooms.

It is unlawful in the UK for a charity to arrange for any adult to share with a child. The only exceptions are those detailed above where the adult is a relative (and there is written parental consent) or with close friends who are perhaps in the same school year, where one has already turned 18 but the other is still 17.

16-17s should always sleep in rooms shared with others of the same sex and as close in age as possible, or in a single room if there is nobody of appropriate age and sex to share with.

Those under and over 18 should not share if possible (but close friends and siblings could be an exception.) If there are several beds in the room it is less likely anyone under 18 could find themselves alone with someone else 18 or over.

Over-18s should not go into under-18s' rooms. If they really need to enter the room they should leave the door open.

#### **The difference between a helper and a volunteer**

A helper is someone who assists or supports others, often in a casual or informal way. They may provide aid, guidance, or effort to make a task easier for someone else, whether professionally or out of kindness.





## Pundarika UK Safeguarding Policy

A volunteer, on the other hand, is someone who offers their time and services willingly and without expecting payment. Volunteering is typically associated with charitable work, community service, or nonprofit efforts where people contribute to a cause or help others out of goodwill.

**While both involve offering assistance, the key differences between a helper and a volunteer lie in intent, structure, and expectation.**

- **Intent:** A helper provides aid to someone in need, often informally and without a structured commitment. They may help out spontaneously, without necessarily being part of an organised effort. A volunteer, however, chooses to give their time and effort to a cause or an organisation, typically with a clear intention to serve a broader purpose.
- **Structure:** Helping can be unplanned and casual, like assisting a neighbour with groceries or guiding a lost traveller. Volunteering, on the other hand, often involves formal roles within charities, nonprofits, or events, where volunteers follow guidelines or schedules.
- **Expectation:** A helper may or may not commit long-term, and their assistance might not be recognized officially. Volunteers, however, are often appreciated for their efforts, may receive training, and sometimes earn certifications or acknowledgments for their contributions.

## 14. Useful contact information

### LOCAL CONTACTS FOR REPORTING ABUSE IF NECESSARY

Safeguarding children in Hampshire where Lord Wandsworth College is located.

#### How to raise a safeguarding concern

For all emergency situations call 999.

Concerns about a child

If you have any concerns because you think that a child might be being abused and you want to talk to someone or ask someone to find out what is going on, you should contact Children's Services:

- phone [0300 555 1384](tel:03005551384) during office hours 8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday
- phone [0300 555 1373](tel:03005551373) at all other times to contact the Out of Hours service

Concerns about an adult

If you have concerns or want to report, you should contact Hampshire Adult Services:



## Pundarika UK Safeguarding Policy

- phone [0300 555 1386](tel:03005551386) during office hours 8.30am to 5pm Monday, 9.30am to 5pm Tuesday to Thursday, 8.30am to 4.30pm on Friday

Further information about the [Out of Hours](#) service.

RECORD OF CONCERN (to be printed on two sides, and if additional pages are required they should be securely attached)

### NATIONAL CONTACTS AND RESOURCES

- **Thirtyone:eight**

PO Box 133, Swanley, Kent, BR8 7UQ:

Helpline: 0303 003 11 11

Email: [info@ccpas.co.uk](mailto:info@ccpas.co.uk)

Thirtyone:eight formerly known as CCPAS is consulted by churches and other organisations.

They also advise other faith groups and a wide variety of statutory and third sector organisations with safeguarding concerns. They have a 24 hour advice helpline and also offer training and other resources.

- **An Olive Branch** [www.an-olive-branch.org](http://www.an-olive-branch.org)

An Olive Branch was formed in 2011 as a project of the Zen Center of Pittsburgh. Growing out of the need for greater understanding and reduction of ethical misconduct on the part of religious leaders, they provide services to organisations in conflict after a teacher has been accused of misconduct. In the USA they promote understanding and healing and work to strengthen organisations' boards and policies to reduce the likelihood of future misconduct.

They also have some information and resources available on their website.

- **NSPCC**

Weston House, 42 Curtain Road, London EC2A 3NH

Help for children/young people: 0800 1111

Help for adults: 0808 800 5000

- **ChildLine**

**Free and confidential number: 0800 1111**

- **Independent Safeguarding Authority now DBS**

Helpline – 0300 123 1111



## Pundarika UK Safeguarding Policy

- **Charity Commission**

0845 300 0218 or email directly via the contact link on their website

[www.charity-commission.gov.uk](http://www.charity-commission.gov.uk)

### 15. Record of concern

(to be printed on two sides, and if additional pages are required, they should be securely attached).

Note: Use the name and pronouns the individual shares with you. Do not assume based on appearance or documentation. If unsure, gently ask or use gender-neutral language (e.g., 'they/them') until clarified.

Name of the subject of the report:  Pronouns:  Name used / preferred name (if different from legal name):	
Contact information	
Person initiating concern	
Concern or incident (information received)	
Date, time and location	



## Pundarika UK Safeguarding Policy

Any relevant additional information	
Action taken immediately (to be completed by designated safeguarding person to whom the report was made)	
<p>Follow-up plan (by both designated safeguarding people including the director)</p> <p>State clearly if other agencies were required to be contacted and when this was done</p>	
<p>Name: [print]</p> <p>Signature:</p> <p>Date:</p>	

One copy retained confidentially by PUNDARIKA UK: duration according to legal advice. Anonymised copy created by removing identifying details sent to chair of board to confidentially share with the trustees.