

Safeguarding Policy

Version 2

Safeguarding Policy Statement

Sunflower Scotland provides humanitarian assistance in Ukraine to vulnerable children and adults affected by Russia's war against Ukraine. When we perform our humanitarian work, we are fully committed to safeguarding the welfare, dignity and rights of all children and protected adults with whom we come into contact. We understand the risks and limitations of working in the war zone and act accordingly.

Sunflower Scotland has zero tolerance for abuse, exploitation, neglect or harm of any kind. Any safeguarding concern will be taken seriously and acted upon, regardless of who is involved.

Although our activities take place in Ukraine, Sunflower Scotland is a Scottish registered charity and is committed to applying Scottish safeguarding standards and best practice in all our work, in line with OSCR expectations.

Our Principles

We believe that vulnerable children and adults:

1. deserve to be treated with honesty, compassion, dignity and kindness;
2. should be addressed with respect and in their own language wherever possible;
3. should be enabled to communicate, participate and be listened to;
4. should be treated in a way that is culturally appropriate in Ukraine and respectful.

We have put in place this Procedure which explains how we help to keep vulnerable children and vulnerable safe and respond to child / vulnerable adults protection concerns.

Definitions

Vulnerable Child: any person under the age of 18 with a disability or orphan.

Protected / Vulnerable Adult: an adult who is unable to safeguard their own wellbeing, property, rights or other interests due to disability, illness, trauma, age or circumstance.

Safeguarding: the responsibility to protect children and vulnerable adults from harm, abuse, neglect or exploitation.

Abuse: may be physical, sexual, emotional, psychological, financial, neglectful, discriminatory or exploitative, including child criminal or sexual exploitation.

1. Context

Sunflower Scotland fundraises and collects donations in Scotland and delivers humanitarian assistance in Ukraine.

We support people affected by war, including:

- Disabled children (with physical and/or mental disabilities)
- Orphans, including those with disabilities
- Disabled adults
- Older people with or without disabilities
- Wounded and injured people receiving hospital or rehabilitation care

We provide support:

- (a) directly to vulnerable children and adults; and/or
- (b) to Ukrainian organisations supporting these groups.

We do not provide medical treatment, evacuation services or physical protection.

We meet vulnerable children and adults only in the presence of their guardians.

2. Purpose

This policy sets out Sunflower Scotland's approach to:

- preventing harm and abuse;
- recognising safeguarding concerns;
- responding appropriately and proportionately;
- reporting and recording concerns;
- referring matters to relevant authorities.

3. Scope

This policy applies to all safeguarding-related interactions involving Sunflower Scotland, including in-person, online and remote communication immediately when these interactions are taking place.

It applies to all trustees, employees and volunteers involved in Sunflower Scotland's work in Ukraine ("Team Members").

Our work involves providing humanitarian assistance in the war zone as quickly and efficiently as possible, and our responsibilities do not include:

- (a) protecting children and vulnerable adults when we are not present;**
- (b) providing physical protection, medical care and other works during war incidents.**

4. Roles and Responsibilities

4.1. Board of Trustees

The Board of Trustees holds ultimate responsibility for safeguarding within Sunflower Scotland, even where day-to-day duties are delegated.

4.2. Designated Safeguarding Lead (DSL)

DSL name: Oleg Dmitriev

DSL email: chairman@sunflowerscotland.co.uk

Responsibilities:

- monitor the implementation of this Policy by the organisation's Team members;
- receive reports of any Safeguarding Concerns and Incidents from Sunflower's Team members or members of the public;
- evaluate reports, act accordingly to the Policy and involve appropriate authorities if necessary;
- record Safeguarding concerns and incidents;
- follow up on Safeguarding concerns and incidents;
- review this policy regularly.

4.3. Team Member

All Sunflower Scotland's staff and volunteers participating in humanitarian missions must:

- act with honesty, integrity, compassion and kindness towards the vulnerable groups we are helping;
- maintain appropriate boundaries;
- meet vulnerable persons in the presence of their guardians;
- avoid being alone with a child or protected adult where possible;
- never exchange personal contact details or engage in inappropriate relationships;
- obtain consent for photographs, videos or stories;
- constantly monitor any Safeguarding concerns or incidents;
- report Safeguarding Issues to DSL immediately or when it is safe to do so;
- when safeguarding concerns involve DSL, report them to the Board of Trustees.

5. Dealing with Safeguarding Concerns and Incidents

5.1. Process

Sunflower Scotland follows a simple safeguarding process:

Recognise → Listen → Report → Record

Recognise: Be alert to signs of abuse or harm (Safeguarding concern).

Listen: Stay calm, listen, do not promise confidentiality.

Report: Inform the DSL immediately (or when it is safe to do so).

Record: DSL will write an accurate, factual record.

DSL will decide if the concern is an urgent incident, in which case they will involve the relevant authorities.

Sunflower Scotland **does not investigate abuse**. Our role is to record concerns and refer them appropriately.

5.2. Concerns and Incidents

Safeguarding concerns may include:

- Child Criminal or Sexual Exploitation (CCE / CSE)
- Domestic abuse or violence
- Violence
- Self-harm
- Air raid alerts
- War events (explosions, injuries)

Who may cause safeguarding concerns or incidents:

- members of the public;
- Sunflower Scotland's team members;
- other children (e.g. child-on-child abuse);
- vulnerable adults (e.g. conflict between vulnerable adults).

Allegations against team members may result in temporary suspension from duties and will be reported to trustees and authorities where appropriate.

6. Response to Safeguarding Incidents

- **Child Criminal or Sexual Exploitation (CCE / CSE):** Contact Ukrainian Police
- **Domestic abuse or violence:** Contact Ukrainian Police
- **Self-harm or violence risk:** Contact Ukrainian Police
- **Air raid alert:** Help to move vulnerable children / adults to nearest shelter or (if not practical) follow two-wall rule
- **War events (explosions, injuries):** Contact Ukrainian emergency services

7. Contacts

7.1. Ukrainian Authorities

- Police: 102
- Juvenile Police Hotline: 0-800-50-02-02
- Emergency services: 112
- Human trafficking / domestic violence hotline: 1547

7.2. Whistleblowing

Concerns involving the DSL may be reported to the Board of Trustees at: whistleblowing@sunflowerscotland.co.uk (this email is not monitored by DSL).

Concerns raised in good faith will be treated confidentially and without retaliation.

8. Record Keeping and Confidentiality

- All safeguarding concerns and actions will be recorded in writing;
- Records will be stored securely with restricted access;
- Information will be shared only on a need-to-know basis;
- UK-held records will comply with GDPR principles.

9. Relevant Legislation

- Adult Support and Protection (Scotland) Act 2007
- Children and Young People (Scotland) Act 2014, supported by national guidance
- Children (Care and Justice) (Scotland) Act 2024.
- OSCR Safeguarding Guidance

10. Review

This policy will be reviewed annually or sooner if required.

Document version control

Version number	Change or update	Date	Author or owner
1.0	Draft	05/01/2026	O Dmitriev
2.0	Review	06/01/2026	O Dmitriev
2.1	Added clause re guardians	21/01/2026	M Coughtrie, O Dmitriev