



In Charley's Memory

Safeguarding Policy

October 2022

Policy Type

Charity Policy Document

Definitions

ICM = In Charley's Memory

Purpose of Policy

To ensure ICM acknowledges the duty of care to safeguard and promote the welfare of children and adults, and vulnerable adults using our service.

This policy applies to anyone working on behalf of In Charley's Memory, including senior managers and the board of trustees, paid staff volunteers and students.

Legal Framework

To ensure ICM commits to ensuring safeguarding practices. This policy is drawn up on the basis of legislation, statutory responsibilities, government guidance that seek to protect children, young people and adults (including vulnerable adults) and it ensures it complies with the best practice and BACP requirements.

Safeguarding Adults vs Children

To ensure ICM follows proper procedure in safeguarding matters it is essential to note the differences in safeguarding adults and children. While the different forms of abuse can happen to anyone, regardless of age or ability, it is important to keep the right to self-determination in mind. Adults, by law, have the right to self-determination, meaning they can refuse reporting of abuse. It is only in extreme circumstances where this may be bypassed. This will often only happen when an adult is assessed to lack capacity in that area, or where the concerns may extend to children, such as when they are living in the same household.

Supporting documents

- Definitions of abuse
- Counselling children and young people
- Contact from a suicidal client

- Dealing with disclosures and concerns about a child
- Recording concerns and information sharing
- Health and Safety
- Whistleblowing
- Risk Assessments

***All supporting Documents are in the safeguarding folder in the staff room, you will also receive a copy of these documents in your induction pack.

Policy

- Promote and prioritise the safety and wellbeing of children, young people and adults.
- Ensure everyone understands their role and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities, to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people.
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual(s) who raise or disclose the concern.
- Ensure the confidentiality, detailed and accurate records of all safeguarding concerns are maintained and securely stored.
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made.
- Providing effective management for staff and volunteers through supervision, support, and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently.
- Ensure robust safeguarding arrangements and procedures are in operation.
- All employers, employees and volunteers must refresh their safeguarding training on an annual basis.
- PLEASE REFER TO THE SAFEGUARDING PROCEDURE FOR COURSE OF ACTION TO BE TAKEN

Roles and Responsibilities

- Safeguarding lead:
Tammy Webb-Gardner Counselling Services Manager
Counsellingservicesmanager@incharleymemory.com
07525173994
- Deputy Safeguarding:
Dawn Carey CEO
ceo@incharleymemory.com
07702492158
- Safeguarding Trustee
Martyn Ellis
trustees@incharleymemory.com

***All safeguarding reports are reviewed internally by the senior team, these reports are kept locked up and will be stored for 7 years, and for a CYP stored for 7 years upon turning 18.

Review Author: Jenna Meyrick

Date – 19/10/22

Next Review - 19/10/23



In Charley's Memory

Definitions and signs of child abuse

Guidance for professionals who work with children on how to recognise the signs of child abuse

January 2023

What is child abuse?

Child abuse happens when a person harms a child. It can be physical, sexual or emotional, but can also involve neglect.

Children may be abused by:

- family members
- friends
- people working or volunteering in organisational or community settings
- people they know
- strangers.

General signs of abuse

Children experiencing abuse often experience more than one type of abuse over a period of time.

Children who experience abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend.

Definitions and signs of child abuse

Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children or young people needs to be able to recognise the signs.

These include a child:

- being afraid of particular places or making excuses to avoid particular people
- knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/or sexual behaviour
- having angry outbursts or behaving aggressively towards others
- becoming withdrawn or appearing anxious, clingy or depressed
- self-harming or having thoughts about suicide
- showing changes in eating habits or developing eating disorders
- regularly experiencing nightmares or sleep problems
- regularly wetting the bed or soiling their clothes

- running away or regularly going missing from home or care
- not receiving adequate medical attention after injuries.

These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents or carers. If you have any concerns about a child's wellbeing, you should report them following your organisation's safeguarding and child protection procedures.

Find out more about recognising and responding to abuse

Physical abuse

What is physical abuse?

Physical abuse happens when a child is deliberately hurt, causing physical harm. It can involve hitting, kicking, shaking, throwing, poisoning, burning or suffocating. It's also physical abuse if a parent or carer makes up or causes the symptoms of illness in children. For example, they may give them medicine they don't need, making them unwell. This is known as fabricated or induced illness (FII).

Spotting the signs of physical abuse

All children have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern.

Injuries that are more likely to indicate physical abuse include:

Definitions and signs of child abuse

- bruises on babies who are not yet crawling or walking
- bruises on the cheeks, ears, palms, arms and feet
- bruises on the back, buttocks, tummy, hips and backs of legs
- multiple bruises in clusters, usually on the upper arms or outer thighs
- bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe
- large oval-shaped bite marks.
- Burns or scalds
- any burns which have a clear shape of an object, for example cigarette burns
- burns to the backs of hands, feet, legs, genitals or buttocks.

Other signs of physical abuse include multiple injuries (such as bruising, fractures)

inflicted at different times. If a child is frequently injured, and if the bruises or injuries are unexplained or the explanation doesn't match the injury, this should be investigated. It's also concerning if there is a delay in seeking medical help for a child who has been injured.

Neglect

What is neglect?

Neglect is not meeting a child's basic physical and/or psychological needs. This can result in serious damage to their health and development. Neglect may involve a parent or carer not:

- providing adequate food, clothing or shelter

- supervising a child or keeping them safe from harm or danger(including leaving them with unsuitable carers)
- making sure the child receives appropriate health and/or dental care
- making sure the child receives a suitable education
- meeting the child's basic emotional needs – this is known as emotional neglect.

Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse.

Spotting the signs of neglect

Neglect can be difficult to identify. Isolated signs may not mean that a child is suffering neglect, but multiple and persistent signs over time could indicate a serious problem.

Some of these signs include:

- children who appear hungry - they may not have lunch money or even try to steal food
- children who appear dirty or smelly
- children whose clothes are inadequate for the weather conditions
- children who are left alone or unsupervised for long periods or at a young age
- children who have untreated injuries, health or dental problems
- children with poor language, communication or social skills for their stage of development
- children who live in an unsuitable home environment.

Sexual abuse

What is sexual abuse?

Sexual abuse is forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse. Child sexual abuse can involve contact abuse and non-contact abuse.

Contact abuse happens when the abuser makes physical contact with the child. It includes:

- sexual touching of any part of the body whether the child is wearing clothes or not
- rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
- forcing or encouraging a child to take part in sexual activity
- making a child take their clothes off or touch someone else's genitals.

Non-contact abuse involves non-touching activities. It can happen online or in person and includes:

- encouraging or forcing a child to watch or hear sexual acts
- making a child masturbate while others watch
- not taking proper measures to prevent a child being exposed to sexual activities by others
- showing pornography to a child
- making, viewing or distributing child abuse images
- allowing someone else to make, view or distribute child abuse images.
- meeting a child following online sexual grooming with the intent of abusing them.

Online sexual abuse includes:

- persuading or forcing a child to send or post sexually explicit images of themselves, this is sometimes referred to as sexting
- persuading or forcing a child to take part in sexual activities via a webcam or smartphone
- having sexual conversations with a child by text or online.

Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped.

Abusers will often try to build an emotional connection with a child in order to gain their trust for the purposes of sexual abuse. This is known as grooming. There may be physical signs that a child has suffered sexual abuse.

These include:

- anal or vaginal soreness or itching
- bruising or bleeding near the genital area
- discomfort when walking or sitting down
- an unusual discharge
- sexually transmitted infections (STI)
- pregnancy.

Changes in the child's mood or behaviour may also cause concern. They may want to avoid spending time with specific people. In particular, the child may show sexual behaviour that is inappropriate for their age.

For example:

- they could use sexual language or know things about sex that you wouldn't expect them to
- they might become sexually active or pregnant at a young age.

Child sexual exploitation

What is child sexual exploitation?

Child sexual exploitation (CSE) is a type of sexual abuse. Young people may be coerced or groomed into exploitative situations and relationships. They may be given things such as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities.

Young people may be tricked into believing they're in a loving, consensual relationship. They often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what's happening. They might be invited to parties and given drugs and alcohol before being sexually exploited. They can also be groomed and exploited online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs (Berelowitz et al, 2013).

Child sexual exploitation can involve violent, humiliating and degrading sexual assaults and involve multiple perpetrators.

Spotting the signs of child sexual exploitation

Sexual exploitation can be very difficult to identify. Young people who are being sexually exploited may:

- go missing from home, care or education
- be involved in abusive relationships
- hang out with groups of older people
- be involved in gangs or anti-social groups
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- be involved in petty crime such as shoplifting
- have access to drugs and alcohol
- have new things such as clothes and mobile phones, which they aren't able to easily explain
- have unexplained physical injuries

Harmful sexual behaviour

What is harmful sexual behaviour?

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive. It may also be referred to as sexually harmful behaviour or sexualised behaviour.

HSB encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It is harmful to the children and young people who display it, as well as the people it is directed towards.

HSB can include:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- sexual activity with other children or adults.

Sexual behaviour between children is considered harmful if one of the children is much older – particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't (Davies, 2012). However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled (Rich, 2011). Spotting the signs of harmful sexual behaviour It's normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation.

Emotional abuse

What is emotional abuse?

Emotional abuse involves:

- humiliating, putting down or regularly criticising a child
- shouting at or threatening a child or calling them names
- mocking a child or making them perform degrading acts
- constantly blaming or scapegoating a child for things which are not their fault
- trying to control a child's life and not recognising their individuality
- not allowing a child to have friends or develop socially

- pushing a child too hard or not recognising their limitations
- manipulating a child
- exposing a child to distressing events or interactions
- persistently ignoring a child
- being cold and emotionally unavailable during interactions with a child
- not being positive or encouraging to a child or praising their achievements and successes.

Spotting the signs of emotional abuse

There aren't usually any obvious physical signs of emotional abuse but you may spot changes in a child's actions or emotions. Some children are naturally quiet and self-contained whilst others are more open and affectionate. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child or are particularly unusual for their stage of development.

Babies and pre-school children who are being emotionally abused may:

- be overly-affectionate towards strangers or people they haven't known for very long
- not appear to have a close relationship with their parent, for example when being taken to or collected from nursery
- lack confidence or become wary or anxious
- be unable to play
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends
- fear making mistakes
- fear their parent being approached regarding their behaviour
- self-harm.

Domestic abuse

What is domestic abuse?

Domestic abuse is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality. It can include physical, sexual, psychological, emotional or financial abuse. Exposure to domestic abuse is child abuse. Children can be directly involved in incidents of domestic abuse or they may be harmed by seeing or hearing abuse happening. Children in homes where there is domestic abuse are also at risk of other types of abuse or neglect.

Spotting the signs of domestic abuse

It can be difficult to tell if domestic abuse is happening, because abusers can act very differently when other people are around.

Children who witness domestic abuse may:

- become aggressive
- display anti-social behaviour
- suffer from depression or anxiety
- not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

Bullying and cyberbullying

What are bullying and cyberbullying?

Bullying is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable.

Bullying includes:

- verbal abuse, such as name calling
- non-verbal abuse, such as hand signs or glaring
- emotional abuse, such as threatening, intimidating or humiliating someone
- exclusion, such as ignoring or isolating someone
- undermining, by constant criticism or spreading rumours
- controlling or manipulating someone
- racial, sexual or homophobic bullying
- physical assaults, such as hitting and pushing
- making silent, hoax or abusive calls.
- Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games and mobile devices. Online bullying can also be known as cyberbullying.
- Cyberbullying includes:
 - sending threatening or abusive text messages
 - creating and sharing embarrassing images or videos
 - 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
 - excluding children from online games, activities or friendship groups
 - setting up hate sites or groups about a particular child
 - encouraging young people to self-harm
 - voting for or against someone in an abusive poll
 - creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.

Spotting the signs of bullying and cyberbullying

It can be hard to know whether or not a child is being bullied. They might not tell anyone because they're scared the bullying will get worse. They might also think that the bullying is their fault.

No one sign indicates for certain that a child's being bullied, but you should look out for:

- belongings getting 'lost' or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)

- being nervous, losing confidence or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

Child trafficking

What is child trafficking?

Child trafficking is child abuse. It involves recruiting and moving children who are then exploited. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another.

Children may be trafficked for:

- child sexual exploitation
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal exploitation such as cannabis cultivation, pickpocketing, begging,
- transporting, drugs, selling pirated DVDs and bag theft.

Children who are trafficked experience many forms of abuse and neglect. Physical, sexual and emotional abuse is often used to control them and they're also likely to suffer physical and emotional neglect. Child trafficking can require a network of organised criminals who recruit, transport and exploit children and young people.

Some people in the network might not be directly involved in trafficking a child but play a part in other ways, such as falsifying documents, bribery, owning or renting premises or money laundering (Europol, 2011).

Child trafficking can also be organised by individuals and the children's own families. Traffickers trick, force or persuade children to leave their homes. They use grooming techniques to gain the trust of a child, family or community. Although these are methods used by traffickers, coercion, violence or threats don't need to be proven in cases of child trafficking - a child cannot legally consent to their exploitation so child trafficking only requires evidence of movement and exploitation.

Modern slavery is another term which may be used in relation to child trafficking. Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking (HM Government, 2014). The Modern Slavery Act passed in 2015 in England and Wales categorises offences of slavery, servitude, forced or compulsory labour and human trafficking.

Spotting the signs of child trafficking

Signs that a child has been trafficked may not be obvious but you might notice unusual behaviour or events.

Children who have been trafficked may:

- have to do excessive housework chores
- rarely leave the house and have limited freedom of movement
- not have any documents (or have falsified documents)
- give a prepared story which is very similar to stories given by other children
- be unable or reluctant to give details of accommodation or personal details
- not be registered with a school or a GP practice
- have a history with missing links and unexplained moves

- be cared for by adults who are not their parents or carers
- not have a good quality relationship with their adult carers
- be one among a number of unrelated children found at one address
- receive unexplained or unidentified phone calls whilst in a care placement or temporary accommodation.
- There are also signs that an adult is involved in child trafficking, such as:
 - making multiple visa applications for different children
 - acting as a guarantor for multiple visa applications for children
 - having previously acted as the guarantor on visa applications for visitors who have not left the UK when the visa expired.

Female genital mutilation

What is female genital mutilation?

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. The age at which FGM is carried out varies. It may be carried out when a child is new-born, during childhood or adolescence, just before marriage or during pregnancy (Home Office et al, 2016).

FGM is child abuse. There are no medical reasons to carry out FGM. It's dangerous and a criminal offence.

Spotting the signs of female genital mutilation

A child at risk of FGM may not know what's going to happen. But they might talk about or you may become aware of:

- a long holiday abroad or going 'home' to visit family
- relative or cutter visiting from abroad
- a special occasion or ceremony to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin or an older female relative such as
- a mother or aunt
- missing school repeatedly or running away from home.

A child who has had FGM may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

Reporting requirements

Regulated health and social care professionals and teachers in England and Wales must report 'known' cases of FGM in under-18s to the police (Home Office, 2016).

D. Carey

Signed

Date: January 2023

Review Author: Jenna Meyrick

References

Berelowitz, S., Clifton, J., Firmin, C., Gulyurtlu, S. and Edwards, G. (2013) "If only someone had listened": Office of the Children's Commissioner's inquiry into child sexual exploitation in gangs and groups. London: Office of the Children's Commissioner.

<<https://www.childrenscommissioner.gov.uk/publication/if-only-someone-had-listened/>>



In Charley's Memory

Young Persons Policy

October 2022

Policy Type	Charity Policy Document
Purpose of Policy	The purpose of the Young Persons Policy is to outline what is expected of the employer and young people working within In Charley's Memory .
Definitions	<p>ICM: refers to the charity name In Charley's Memory</p> <p>Employer: Refers to the management of the ICM charity</p> <p>Young People: Refers to any person under the age of 18 visiting or working for the charity either paid, for work experience or voluntary.</p>

<p>Policy</p>	<ul style="list-style-type: none"> ● It is the employer’s responsibility to ensure all health and safety assessments are up to date. ● All young people working for the charity must complete an induction that will include the health and safety of themselves and others within the offices. ● No young person is to be left alone, unsupervised in the office at any time. ● All employees whether paid or voluntary will have an in date DBS check. ● Young people must follow all training, rules and procedures whilst in the ICM office. ● Employer should plan appropriately for the work experience people and volunteers to reduce the risks resulting from unplanned activities. ● If a young person is in the office by themselves but have the supervision of another charity employee/volunteer in the treatment room they must have the panic alarm on their person at all times. ● At all times confidentiality must be adhered to.
<p>Review Author</p>	<p>Jenna Meyrick</p>
<p>Review Date</p>	<p>19/10/2022</p>
<p>Reviewer Sign</p>	<p>JLMeyrick</p>



In Charley's Memory

Contact from a suicidal client

Policy Type

Charity Policy

Purpose Of Policy

To outline the procedure for contact from a suicidal client.

Policy

- Where possible do not turn on your phone until you are due to start work.
- IF YOU RECEIVE CONTACT FROM YOUR CLIENT:
- If a client has contacted you saying they are going to take their own life, offer them the Samaritans number and advise them to contact A&E.
- Contact CSM or CEO and raise a safeguarding concern, explain to the client that we will be contacting their GP as soon as possible to inform them.
- Do not engage in conversation.
- Clients are informed at assessment that a counsellor will only be available during counselling hours, and we are not a crisis team.

Review Author: Jenna Meyrick

Review date: 19/10/22

Next review: 19/10/23

Review Signed:

JL Carey



GUIDANCE TO DISCLOSURES

October 2022

Document Type

Charity

Definitions

CEO Chief Executive Officer

CSM Counselling Services Manager

Purpose

To have a clear procedure that is to be followed when a client discloses something in the room.

Procedure

- Show you care, listen to their disclosure. Allow them to explain in their own words and at their own pace.
- Reflect what they have said, to be clear that you have understood what has been said.
- Reassure the client that they have done the right thing.
- Explain to the client that you can not keep this information confidential but will support them.
- Ensure notes are taken clearly and use the client words only.

Please follow the safeguarding procedures and policy, you would have received this during your induction.

- All disclosures MUST be dealt with on the day. If CEO or CSM is not in the office then you must immediately contact them.

CSM Mobile : 07525173994

CEO Mobile : 07702492158

If you have any concerns or questions please discuss this with CSM or CEO.

Signed JLMeyrick

Date 19/10/22

Review 19/10/23



IN CHARLEY'S MEMORY HEALTH AND SAFETY POLICY 2022

Part 1: Statement of intent

This is the health and safety policy of

In Charley's Memory

Our health and safety policy is implemented to:

- prevent accidents and cases of work- related ill health
- manage health and safety risk in our workplace
- provide clear instructions and information and adequate training, to ensure employees are competent to do their work.
- Consult with our employees and volunteers on matters effecting their health and safety
- Maintain safe and healthy working conditions
- Implement emergency procedures including evacuation in case of fire or other significant incident.
- Review this policy regularly

Signed

Date 19/10/22

Print name Jenna Meyrick

Review date 19/10/23

Part 2: Responsibilities for health and safety

1 overall and final responsibility for health and safety:

Dawn Carey (CEO)

2 Day to day responsibility for ensuring this policy is put into practice:

Jamie Scanlon, Jenna Meyrick

3 To ensure health and safety standards are maintained/improved, the following people have responsibility in the following areas

Dawn Carey and Tammy Webb-Gardner – safety, risk assessments, consulting staff.

Dawn Carey First Aider, Fire procedures

Tammy Webb-Gardner supervision and training

4 All employees should:

- Co-operate with supervisors and managers on health and safety matters
- Take responsible care of their own health and safety
- Report all health and safety concerns to the appropriate person (as detailed above)

Part 3: Arrangements for health and safety

Risk assessment

We will complete relevant risk assessments and act accordingly

We will review regularly or when working habits or conditions change

Training

We will provide training where needed

We will provide PPE where needed (please read the Covid File)

We will make sure suitable arrangements are in place for people working remotely

Consultation

We will consult staff routinely on health and safety matters as they arise or when this policy is reviewed.

Evacuation

We comply with Hytech evacuation policy.

The fire alarm and evacuation procedure are routinely tested.



WHISTLEBLOWING POLICY AND PROCEDURE

October 2022

Policy Type

Charity Policy

Abbreviations

In Charley's Memory	ICM
Employees and Volunteers	Staff
Management and Trustees	Employer
Chief Executive Officer	CEO

Purpose of Policy

IN CHARLEY'S MEMORY requires trustees, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of In Charley's Memory, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

What is whistleblowing?

Whistleblowing is the confidential disclosure by any individual of any concern encountered in the workplace related to a perceived wrong doing. IN CHARLEY'S MEMORY considers such wrongdoing to include but not exclusive:

- General malpractice, such as immoral, illegal or unethical conduct
- Conduct where someone's health and safety has been put in danger
- Gross misconduct
- Sharing any information concerning In Charley's Memory

If individuals have concerns relating to their employment/voluntary sessions with In Charley's Memory, these should be raised under IN CHARLEY'S MEMORY grievance policy.

Reporting responsibility

The Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that ICM can address and correct inappropriate conduct and actions. It is the responsibility of all trustees, employees and volunteers to report concerns about violations of ICM code of ethics or suspected violations of law or regulations that govern ICM operations.

No retaliation

It is contrary to the values of ICM for anyone to retaliate against any trustee, executive, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of ICM. An employee who

retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting procedure

ICM has an open door policy and suggests that employees/volunteers share their questions, concerns, suggestions or complaints with the CEO. If you are not comfortable speaking with the CEO or you are not satisfied with the CEO's response, you are encouraged to speak with the Trustees. If the concern is about the Trustees then you should write to the Chair of the Board of Trustees, Martyn Ellis.

CEO's are required to report complaints or concerns about suspected ethical and legal violations in writing to the Trustees who have the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their CEO or the Trustees.

ceo@incharleymemory.com

trustee@incharleymemory.com

Compliance Officer

The CEO is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The CEO will advise the Board of Trustees of all complaints and their resolution and will report at least annually to them on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The CEO shall immediately notify the Trustees of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Trustees will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

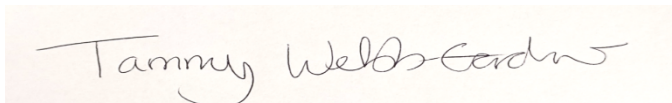
Monitoring and review

The senior management team, with adequate consultation of the Board of Trustees, will regularly review the operation of this policy.

Signature:

Position: Receptionist

Review signed

A handwritten signature in black ink on a light-colored rectangular background. The signature reads "Tammy Wells-Gardner" in a cursive script.

Date: 19/10/22

Review Date 19/10/23