

## CHILD PROTECTION / SAFEGUARDING POLICY

### References

The Children Act 1989  
The Children Act 2004  
Working Together to Safeguard Children 2006 HMG Guidance  
European Convention of Human Rights  
London Child Protection Procedures 2007  
National College of School Leadership Safer Recruitment Procedures  
Counter Terrorism and Security Act 2015

### 1. Introduction

**1.1** IntoUniversity believes that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people, by a commitment to practice which protects them.

### 2. Definitions

**2.1** **Safeguarding** and Promoting the welfare of Children and Young People is defined within the Government Working Together to Safeguard Children 2015 Guidance as

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- and taking action to enable all children to have the best outcomes

**2.2** **Child Protection** is a part of safeguarding and refers to the specific activity that is undertaken to protect Children and Young People who are suffering, or who are at likely future risk of suffering, significant harm.

**2.3** Section 47 of the Children Act 1989 introduced the concept of **significant harm** as the threshold to justify compulsory intervention in family life by statutory agencies; namely, Children and Young People's Services, Police and the NSPCC. There are no absolute criteria as to what constitutes significant harm, and a judgment will need to be made on a case by case basis depending on the nature, degree and duration of the harm and many other factors, including the family's strengths and support systems.

Even where a child or young person has been assessed as being at risk of significant harm, the overriding aim will be to work in partnership to support the family in being able to care safely for the child/children or young person(s). Other non-statutory agencies and services have a vital

role in contributing to this work as well as earlier identification and intervention to prevent problems arising or escalating.

**2.4 Children's Social Care** refers to the work of local authorities exercising their social services functions with regard to children. Arrangements for children's social care will differ within each local authority and each Team/Centre Leader should ensure that s/he is familiar with the systems operated by their Local Authority.

### 3. Legislative Framework

**3.1** The legislative bases for protecting Children and Young People are the Children Acts of 1989 and 2004. The Children Act 1989 is the legislative basis both for protecting Children and Young People from significant harm and promoting the provision of services for Children and Young People in need. The Children Act 2004 sets out the vision for Children and Young People in terms of five key outcomes:

- staying safe
- being healthy
- enjoying and achieving
- making a positive contribution
- achieving economic well-being.

The 'staying safe' outcome is underpinned by a statutory duty of all agencies working with Children and Young People to promote safeguarding in the way it carries out its function.

**3.2** Section 11 of The Children Act 2004 says that every organisation working with children, young people and parents that receives grant funding must show that they are run safely.

**3.3** Children and Young People have a legal right to be protected from harm under the Children Act 1989 and also the European Convention of Human Rights.

**3.4** Sections 36 to 41 of the Counter Terrorism and Security Act 2015 sets out the duty on local authorities, schools and organisations to provide support for people vulnerable to being drawn into terrorism. This is known as the Channel programme. The Child Protection team should be contacted in the event that any staff member has a concern about a child being vulnerable to being drawn into terrorism and all Team and Centre leaders are familiar with Channel.

### 4. National and Local Guidance

**4.1** The Government's 'Working Together to Safeguard Children' (revised 2006), sets out how statutory and voluntary agencies should work together to promote the safety and welfare of Children and Young People.

**4.2** The *London Child Protection Procedures* sets out the procedures which all London agencies, groups and individuals must follow in identifying, raising and responding to welfare concerns when coming into contact with or receiving information about children 0 to 17 years, including unborn children and adolescents up to their 18th birthday.

**4.3** In addition each Local Authority will have its own local guidance. Each **IntoUniversity** Team/Centre Leader should be familiar with this guidance and consult with the Child Protection team if the local guidance raises any issues for **IntoUniversity's** safeguarding policy and practice.

## **5. Internal Roles and Responsibilities**

**5.1 The Trustees** are responsible for ensuring that an appropriate Child Protection / Safeguarding Policy is in place and for nominating a 'Safeguarding Trustee' (see below).

**5.2 The Safeguarding Trustee** has oversight of **IntoUniversity's** Child Protection / Safeguarding policy and procedures, and responsibility for promoting the safeguarding of children and young people within the charity.

**5.3 The Chief Executive** is responsible for ensuring that the Child Protection / Safeguarding policy is implemented within **IntoUniversity** as a whole and providing appropriate staff and volunteer training where necessary. The Chief Executive is also a Point of Contact on the Child Protection team.

**5.4 The Designated Lead for Safeguarding** (please consult your Team/Centre Leader to find out who has been designated this role) is responsible for internal staff training and for ensuring that the charity is kept abreast of current legislation and best practice.

**5.5 The Child Protection Manager** (please consult your Team/Centre Leader to find out who has been designated this role) is responsible for coordinating, processing and keeping records of all incidents and all referrals to external agencies.

**5.6 The DBS Officer** (please consult your Team/Centre Leader to find out who has been designated this role) is responsible for ensuring that all employed staff have a current DBS clearance.

**5.7 Team/Centre Leaders** are responsible for the implementation of the policy in their centres and ensuring that all staff and volunteers are aware of the importance of and have signed to say that they have read and understood this policy. Team/Centre Leaders are responsible for ensuring that all volunteers working at their centre are checked with the DBS. Team/Centre Leaders are also responsible for referring information to the Child Protection team and if required to the Local Authority. Each

IntoUniversity Team/Centre Leader should be familiar with the safeguarding guidance issued by the Local Authority and consult with the Child Protection team if the local guidance raises any issues for IntoUniversity's safeguarding policy and practice.

**5.8 All staff and volunteers** are responsible for safeguarding children and young people. They should be diligent in immediately sharing suspicions or disclosures with the Team/Centre Leader or in their absence the Child Protection Manager or another member of the Child Protection team and accurately recording information.

## 6. External Roles and Responsibilities

**6.1 The Local Authority Designated Officer (LADO).** The role of the LADO is set out in the HM Government guidance Working Together to Safeguard Children (2006). Appendix 5 outlines the procedures for managing allegations against people who work with children, for example, those in a position of trust, including club welfare officers. The LADO is located within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against children, or related to a child
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case.

**6.2 Local Authority Children's and Young People's Services.** Each Local Authority will have a team overseeing safeguarding within its area. (Contact details for Local Authorities where IntoUniversity Centres are located are listed at Appendix C.) Any concerns raised about young people within IntoUniversity will be referred to the Local Authority.

**6.3 The Police.** Where a child or young person has made a direct allegation or there is clear evidence of a child or young person suffering or at risk of suffering significant harm the matter should immediately be referred to the Police (if it is not possible to obtain a response from Children and Young People's Services).

**6.4 Other Agencies.** Other agencies who may be involved with the care of children and young people include: schools, housing organisations, social services, health services and other third sector agencies. Liaison with these agencies may be necessary in particular cases.

## 7. Principles and Values

**7.1** The welfare of the child/young person is paramount.

**7.2** All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

**7.3** Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

**7.4** IntoUniversity will seek to safeguard children and young people by:

- Valuing them, listening to and respecting them.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made. All staff and volunteers are required to obtain an Enhanced DBS clearance.
- Sharing information about child protection and good practice with children, parents, staff, trustees and volunteers.
- Sharing information about concerns with agencies who need to know, and involving parents and children appropriately.
- Providing effective management for staff and volunteers through supervision, support and training.

## 8. Procedures (see Appendix B)

Where there is any concern of suspected abuse or neglect IntoUniversity staff and volunteers must immediately:

**8.1** Inform both the Team/Centre Leader and the Child Protection Manager at the earliest possible opportunity. If s/he is not available, please contact another member of the Child Protection team.

**8.2** The Child Protection Manager/team will then decide whether to refer the concern to the Local Authority. If the matter is referred to the local authority this should be done immediately by 'phone and followed in writing within 24 hours. Where a child or young person has made a direct allegation or there is clear evidence of a child or young person suffering or at risk of suffering significant harm the matter should immediately be referred to Children & Young People's Services or the Police.

**8.3** Whether the matter is referred or not, all relevant information should be collated and an accurate written record produced of any events,

information or observations. This should be done as soon as possible and uploaded to the student's Salesforce record.

**8.4** If required staff and volunteers must accurately fill out a referral form. (See Appendix D)

**8.5** Staff and volunteers must complete and send a written referral to the Child Protection Manager who will check the form. Team/Centre Leaders will then forward the form to the Local Authority within 24 hours.

**8.6** The Local Authority should acknowledge the written referral within one working day.

**8.7** Staff and volunteers must check with the Team/Centre Leader that the referral form has been passed on.

**8.8** If requested staff must be available to attend a child protection conference and/or strategy meeting.

**8.9** When concerns are in relation to a person who has not reached the age of 18, the concerns should be discussed with the parent or carer and, where possible their agreement should be sought before making referrals to Children and Young People's Services unless this places a child or young person at increased risk of significant harm. For example, in cases where the allegation of abuse is of a sexual nature, this must involve a referral directly to Children and Young People's Services or the Police.

## **9. Dealing with allegations against staff and volunteers**

**9.1** Allegations can arise against staff or volunteers and IntoUniversity is committed to having systems in place to deal with them fairly and consistently. Allegations may be that some kind of abuse has taken place but can also relate to conduct of concern or behaviour that falls short of professional standards. Allegations may arise from colleagues and any staff member or volunteer who has concerns should feel safe to express them without fear of victimisation. Allegations can also arise because of misunderstanding or misinterpretation. They can be a way of seeking attention or in extreme cases maliciously motivated.

**9.2** It is essential that all allegations should be brought to the attention of the Designated Lead for Safeguarding immediately. If the allegation is against this person then a more senior person should be informed.

**9.3** The following action should be taken

- Make sure that the child or young person is safe and away from the alleged perpetrator.
- Refer the matter immediately to the Designated Lead for Safeguarding who will discuss and consider the need for a referral

to the Children and Families Local Authority Designated Officer (LADO).

- Follow any advice given regarding contact with the parents/carers if the alleged victim is a person who has not yet reached the age of eighteen.
- **IntoUniversity's** disciplinary procedures may be implemented, irrespective of the action that is taken by social workers or the police.
- Consider whether the alleged perpetrator has access to children, young people or vulnerable adults elsewhere and if so who needs to be informed.
- Work closely with the Local Authority Children and Young People's Services as well as the police in following procedures.
- Follow up any external investigation with an internal review to ensure any changes needed are put in place.
- Keep a record of all allegations and reviews as this information will need to be provided to the Local Safeguarding Children Board, which has a responsibility to monitor practice and collect data on an annual basis.

## **10. Internet and Computer Safety**

**10.1** **IntoUniversity** is committed to protecting children and young people while using its services from the risks posed by the internet, the use of email, messaging and social networking. Students are advised about the risks and measures that are in place to promote safe access to the internet.

## **11. Monitoring and Review**

**11.1** This policy applies to all staff, including senior managers and the Board of Trustees, paid staff, volunteers, students and anyone working on behalf of **IntoUniversity**.

**11.2** **IntoUniversity** is committed to reviewing our policy and good practice annually.

## **12. Recruitment, Selection and Training**

**12.1** **IntoUniversity** recruits staff and volunteers based on the best and the safest candidate.

**12.2** All job particulars state that enhanced DBS clearance is a requirement of all employees at the charity.

**12.3** Once candidates have been shortlisted **IntoUniversity** asks one or more questions for safer recruitment depending on the role. These

question the candidate's motivation and attitudes to working with children and/or the candidate's commitment to the ethos and values of the charity.

**12.4** All applicants must complete a declaration on the application form declaring any criminal convictions.

**12.5** Before an appointment is made, satisfactory written references must have been received. These are checked with the original application to ensure that dates and other particulars match the application form. Any gaps/inconsistencies in a candidate's work history will be investigated. Candidates will be required to provide verification of identity and must supply original copies of degree certificates and other qualifications.

**12.6** All volunteers will receive child protection training during their initial training period. All staff will receive child protection training during their induction and training period. All trustees will receive child protection training.

### **13. Confidentiality**

**13.1** Copies of all referral forms will be kept securely both by the Team/Centre Leader and by the Child Protection Manager.

**13.2** You should not discuss suspicions or allegations of abuse with anyone other than the staff members referred to in this policy.

### **14. Parental Involvement**

**14.1** Written permission is always obtained in advance for all on-site and off-site activities by the person/s with parental responsibility.

**14.2** IntoUniversity supports students in attaining work experience placements. Parent/Guardians are informed that the charity briefs all partner organisations that, due to the fact that the student is (generally) under the age of 18, we ask that they are not left alone with an employee of the organisation in a private place. The charity stipulates that if it is necessary that a student is working in private with an employee they do so in a room with a glass window and/or a room with a door that is left open. If a situation was to arise where this is not possible – for example if a student should be required to travel alone in car with an employee – that the organisation makes IntoUniversity aware of this as soon as possible (ideally before the placement commences) so special permission is obtained from the student's parent/guardian ahead of the placement. Organisations are also made aware of IntoUniversity's Child Protection / Safeguarding Policy and all employees are expected to adhere to this policy whilst hosting work experience students.

**14.3** If possible, and the child or young person is not at risk of immediate harm, staff must inform the family first about any concerns (see 8.9 above).

## 15. Risk Assessments

IntoUniversity's risk assessments cover all staff and volunteers who children and young people may encounter through the activities of IntoUniversity's work. In preparing risk assessments for off-site, staff should ensure that other agencies (where appropriate) have an adequate Safeguarding policy and that all adults working with children have DBS clearance.

## 16. Ex-employees of the charity

From time to time ex-employees may come back to work or volunteer for the charity. Despite our prior relationship with them for the sake of this policy they should be treated in the same way as any other employee or volunteer whose DBS certificate has not been returned.

## 17. DBS Disclosure Procedures (see Appendix A)

All paid staff, and all volunteer staff that have contact with children and young people in a specified place frequently or intensively, must obtain a satisfactory DBS enhanced clearance. The application for this should be completed as soon as possible once the employment or voluntary role has been confirmed.

The DBS Officer will determine which volunteer roles do not require DBS clearance, assessing whether the role requires frequent or intensive work with children and young people, and whether the role is supervised by IU staff with DBS clearance.

While a DBS application is being processed, paid staff and volunteers may work with children and young people as long as they are supervised by a member of IU's staff who holds a DBS clearance.

When staff complete their DBS application, they must also complete a Disclosure Declaration Form (See Appendix C). This form will be securely held on file.

All DBS applications and/or certificates that show a disclosure will be considered by the DBS Officer who will instigate a risk assessment process to decide whether the person is suitable to work with children and young people.

The risk assessment procedure will involve the following steps:

The DBS Officer will investigate the nature of the offence communicating, if necessary, with the applicant and (with the applicant's permission) any appropriate and relevant third parties.

If further consideration is then needed, the DBS Officer will convene a Risk Assessment Panel consisting of the DBS Officer, a member of the Senior Management Team, the Trustee responsible for Safeguarding and the Child Protection Manager.

The Risk Assessment Panel will make a decision on whether to employ the applicant as a paid member of staff or volunteer. In making this decision the panel may take the following into account:

- The nature and seriousness of the offence(s)
- The age at which the offence(s) was committed
- The time elapsed since the offence(s) was committed
- Any further offence(s)
- Circumstances at the time of the offence(s)
- The potential risk to children/young people/vulnerable adults
- Legal advice
- Whether the applicant declared any offences on the Confidential Declaration Form (see Appendix C), job application form and/or at interview

The Risk Assessment Panel will decide whether any further action is required, for example contacting the police or safeguarding authorities.

The Risk Assessment will be kept securely on file.

## 18. Secure Handling

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, IntoUniversity complies fully with the DBS Code of Practice. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

Disclosure information should be kept securely, in a password restricted document file or secure cabinet, with access strictly controlled and limited to persons authorised to see it as part of their duties.

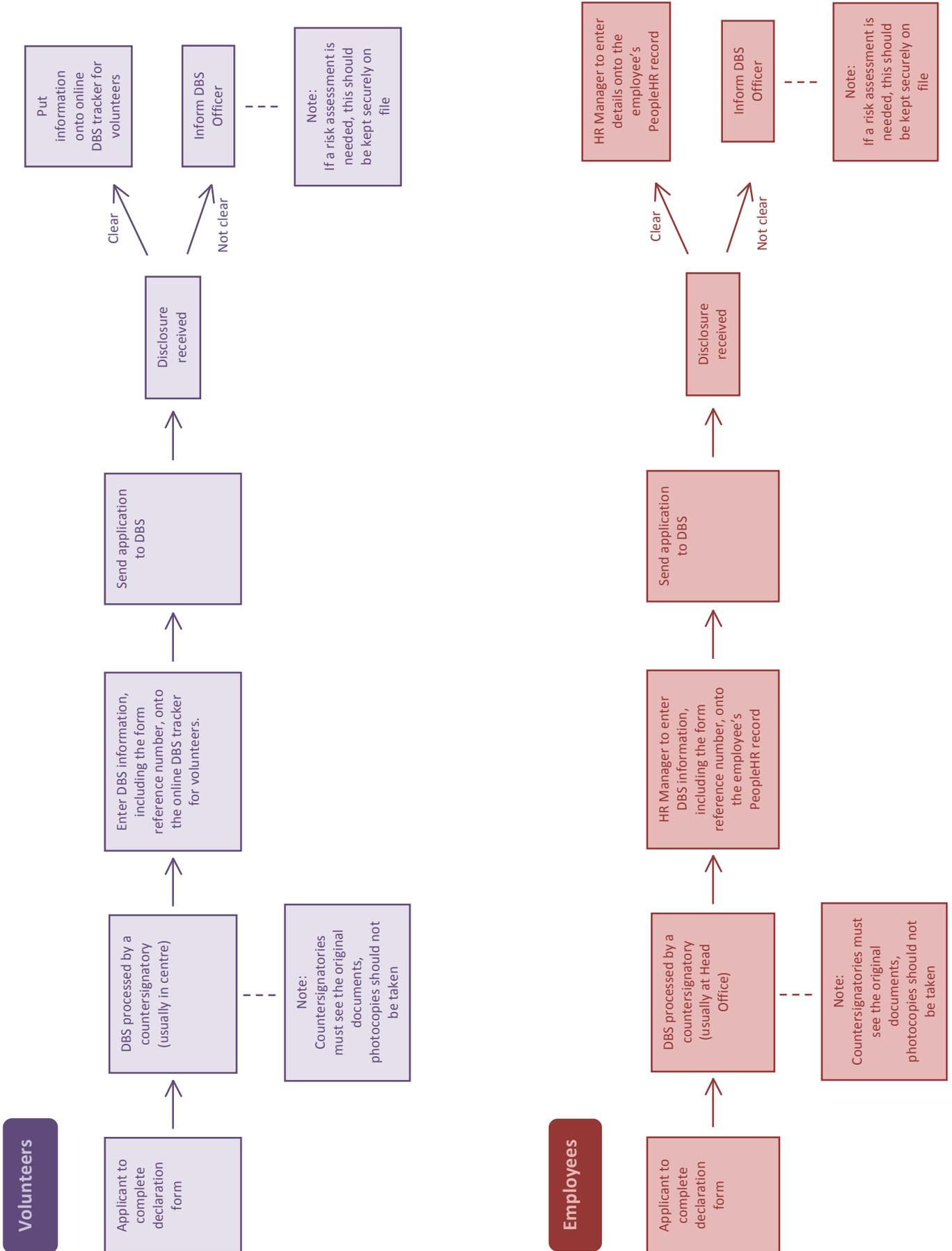
Handling in accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. It is a criminal offence to pass disclosure information to anyone who is not entitled to receive it.

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

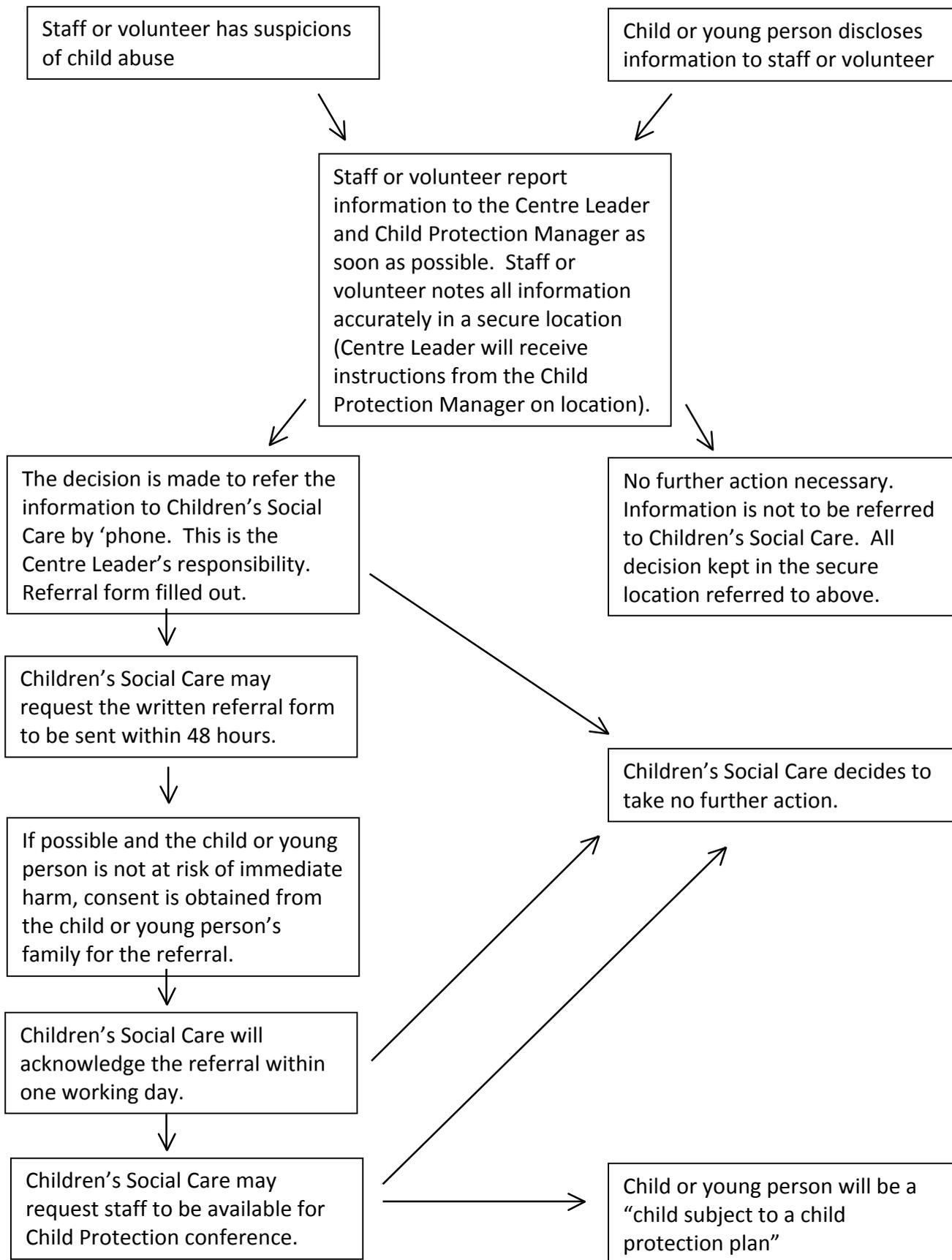
Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we will keep a record of the date of issue of a Disclosure, the name of the subject, the postcode of the subject, the position for which the Disclosure was requested and the unique

reference number of the Disclosure. Any subsequent risk assessments will also be kept securely on file.

APPENDIX A: DBS Clearance Process



**APPENDIX B: Procedure for following up disclosures and concerns**



**APPENDIX C:**

## Staff and Volunteer Disclosure Declaration Form

This form should be completed and signed by every paid or volunteer staff member at the time of completing a DBS application.

This form will be held securely on record. Once you have received the DBS disclosure you need to bring this to your **IntoUniversity** centre or Head Office at the earliest possible opportunity.

Volunteers: Please note that failure to bring in your DBS disclosure may result in you being unable to continue with your volunteering commitments.

All questions must be answered. If any questions are answered 'Yes' the matter must be passed immediately to the DBS Officer.

Name of DBS Applicant	
Position at <b>IntoUniversity</b>	
<b>IntoUniversity</b> staff member processing this form	

Have you been subject to any disciplinary procedures relating to the safety and welfare of children or young people including any instance where the disciplinary sanction has expired or where the allegation was unfounded and/or no disciplinary sanctions were imposed? If so please give details.	Yes	No
Have any official allegations or concerns ever been expressed about your suitability to work with children and young people? If so please give details, including whether the allegation or concern was investigated, the outcome and how the matter was resolved.	Yes	No
Do you have any unspent convictions under the terms of the Rehabilitation of Offenders Act (1974)?  If you answered Yes, please provide further details:	Yes	No

Signed	
Date	

