

# IntoUniversity Safeguarding Policy

for Children, Young People and Vulnerable Adults

## Policy Management

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## **1. Our Policy**

### **1.1 Policy Statement**

**Into**University believes that it is unacceptable for anyone to experience abuse of any kind. We recognise our responsibility to safeguard the welfare of all children, young people and vulnerable adults and we are committed to the safe working practices outlined in this policy to achieve this. The majority of the charity's work takes place with children and young people, less frequently, staff will support students who are adults (aged 18 and over in England and aged 16 and over in Scotland) or come into contact with adults, some of whom will be vulnerable and will therefore need our safeguarding support. This policy mainly references children and young people but vulnerable adults may be included in these practices.

#### **The purpose of this policy:**

- To protect the children, young people and vulnerable adults who engage with **Into**University services.
- To provide staff and volunteers, as well as children and young people and their families, with the principles and practices which guide our approach to safeguarding and child protection.

### **1.2 Scope of Policy**

This policy applies to all staff including: senior managers, trustees, paid staff, sessional and temporary staff, students and volunteers working on behalf of **Into**University.

### **1.3 Legal Framework**

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children, young people and vulnerable adults in England and Scotland, namely:

- Children Act 1989 (and 2004 amendment)
- Children (Scotland) Act 1995
- United Convention of The Rights of the Child 1991
- Human Rights Act 1998
- European Convention of Human Rights 1953
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2022
- Scottish Government policy: Getting it Right for Every Child (GIRFEC)
- NSPCC Safer Recruitment Guidance

Please note this list is not exhaustive and does not preclude other legislation and frameworks having relevance to our practices.

**We recognise that:**

- The welfare of the child is paramount, as enshrined in the Children Act 2004 and the Children (Scotland) Act 1995, and this is true for all children regardless of age, disability, gender, race, religion/belief, sex or sexual orientation.
- Some children are additionally vulnerable due to previous experiences, their level of dependency, communication needs or other issues.
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.
- Vulnerable adults may also require safeguarding. In this policy we will mainly refer to children and young people although we understand that vulnerable adults may need the same level of protection due to their capacity or needs.

**We seek to keep children, young people and vulnerable adults safe by:**

- Valuing, listening to, and respecting them.
- Employing a Safeguarding Manager who is the Designated Safeguarding Lead (DSL) and appointing a wider Safeguarding Team of Deputy Designated Safeguarding Leads consisting of senior leaders and managers.
- Ensuring that those we employ and who work with children, young people and vulnerable adults are DBS checked or, in Scotland, member of the Protection of Vulnerable Groups Scheme (PVG Scheme)
- Adopting child-centred safeguarding policies, procedures and practices and ensuring they are known and followed throughout the organisation.
- Providing effective management of cases through oversight, support, training and robust recording and monitoring procedures.
- Following safer recruitment guidelines, ensuring recruitment is safe and all necessary DBS and PVG scheme membership checks are made.
- Designating a DBS Manager for the organisation, or in Scotland an individual with responsibility for managing the PVG Scheme.
- Recording and storing information professionally and securely, and in Scotland in accordance with the Disclosure Scotland Code of Practice.
- Sharing our safeguarding practices and procedures with students, their families, staff and volunteers and ensuring they know how to raise a concern.
- Escalating and sharing concerns and relevant information about children, young people and vulnerable adults to agencies that need to know. Children, young people, vulnerable adults and their families are routinely included in this process.
- Managing allegations against staff and volunteers appropriately and involving other

agencies when required, and in Scotland where required under the Protection of Vulnerable Groups (Scotland) Act 2007, making a referral to Scottish Ministers.

- Ensuring that we have effective complaints and whistleblowing measures in place.
- Providing a comprehensive training package for staff to ensure they are promoting the welfare and safety of children and young people in their day-to-day work.
- Providing a comprehensive training package for trustees to ensure they are promoting the welfare and safety of children and young people in their governance of the charity.
- Creating and maintaining a safe, anti-bullying environment with policies to address any bullying or unsafe behaviour which may occur.

## **2. Managing Concerns and Disclosures**

All concerns and allegations will be taken seriously and investigated thoroughly. **Into**University recognises that whilst some incidents and allegations will require the support and / or intervention of external agencies, others may be supported through existing internal support mechanisms.

### **2.1 Procedure when there is a safeguarding concern**

Where there is a suspected concern or a direct disclosure of abuse from a child or young person, **Into**University staff and volunteers should follow the below steps:

- If someone is at immediate risk of significant harm the emergency services should be contacted.
- If there has been a disclosure, ensure the child or young person is aware that we may not be able to keep the information confidential and thank them for sharing.
- Inform the Centre Leader or equivalent manager (e.g. the Programme Manager) as soon as practically possible<sup>1</sup>. The Centre Leader will then decide whether the concern can be managed by the centre team or if the concern should be escalated to the Safeguarding Team.
- To escalate or if the Centre Leader cannot be contacted, call the designated safeguarding phone line which is managed by the Safeguarding Manager (DSL) or a member of the Safeguarding Team (Deputy Designated Safeguarding Lead) during delivery hours. If you are expecting to deliver programmes outside of the normal delivery hours, you must arrange cover with the Safeguarding Team prior to the event.
- The Safeguarding Manager/Team along with the centre team will assess the current safety and next steps which may include making a referral to the Local Authority, contacting parents/carers and/or informing school or other services.
- If a referral is made to Social Care, this should be done using the relevant Local Authority guidance (either by phone or in writing). If someone is at an immediate risk of significant harm the matter should be immediately referred to the Police or Social Care via phone or

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<sup>1</sup> Hereafter this policy will refer to Centre Leader as a proxy for other equivalent managers

emergency line, and in Scotland to Police Scotland or the relevant Local Authority Social Work Department. Referrals should always be followed up in a timely manner as advised by the Safeguarding Team.

- If the concern is relating to a child or young person under the age of 18 it should be shared with their parent/guardian and their consent sought. The concern may not be shared with a parent/guardian if it would be unsafe to do so or increase the risk of harm to the child or young person. If it has not been possible to gain consent within a reasonable time frame as assessed by the Safeguarding Team, a referral may be made without parent/guardian consent and the parent/guardian should be informed as soon as possible after the referral.
- Regardless of whether a referral is made, all observations, relevant information and actions taken should be recorded as soon as possible on Salesforce (**Into**University's database).
- Depending on the seriousness of the concern, the Senior Management Team and/or the Safeguarding Team may also report the case to The Charity Commission or the OSCR Scottish Charity Regulator as appropriate.

It is the responsibility of the staff or volunteer who received the disclosure/highlighted the suspected concern/made the observation to follow up with the Centre Leader to ensure the required action(s) has taken place in a timely fashion. Once confirmation of the follow up has been received responsibility then lies with the Centre Leader to ensure all follow up actions are completed and the child or young person is safe. All follow up actions and updates must be recorded on Salesforce.

## **2.2 Contextual Safeguarding**

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. All staff, but especially the Designated Safeguarding Lead (and Deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harm takes a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

If staff and volunteers are made aware of possible abuse or significant harm at school, online or in the community they must take steps to ensure the student is protected from harm. They should follow the same procedure as they would in section 2.1.

## **2.3 The Child's Wishes**

Where there is a safeguarding concern, **Into**University staff and volunteers should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide, although we must ultimately make the safest decision for the child. Systems should be in place for children to express their views and give feedback. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused,

exploited, or neglected, and/or they may not recognise their experiences as harmful. Ultimately, all safeguarding systems and processes will take into account the child's wishes but we must always act with the best interests of the child at heart.

## **2.4 External Agencies**

If an external agency (e.g. the police) requests to meet with a young person in our care, staff should verify who the external agency is and the purpose of the meeting. The Safeguarding Team must be notified immediately and a member of **Into**University staff must remain with the young person until the Safeguarding Team has given advice on next steps.

If the police have arrived to make an arrest of a child aged over 10 in England and 12 in Scotland at an **Into**University centre or whilst a child is in our care, staff may not have time to inform the Safeguarding Team. If this is the case, the Safeguarding Team must be notified as soon as possible following the arrest. If the young person is aged under 10 in England and under 12 in Scotland, staff should inform the police of the child's age as the age of criminal responsibility in England is 10 and Scotland is 12.

## **3. Supporting Staff and Volunteers**

### **3.1 Recruitment and Onboarding**

**Into**University operates Safer Recruitment procedures. All roles are advertised with the clear requirement that staff and volunteers of the charity who are eligible for an enhanced DBS or are required to be PVG Scheme members will be checked, including verifying the applicants' identity. All staff applicants must complete a declaration on the application form declaring any criminal convictions.

The application process and/or interviews for staff and long-term volunteers (Academic Support Tutors, Mentors and Interns) include safeguarding and safer recruitment questions. These questions gauge the candidate's motivation and attitudes to working with children and young people. The application process for staff also includes questioning of any CV gaps.

On conditional offer, written references for staff and long term volunteers are checked. For staff, any gaps / inconsistencies in employment are investigated and staff applicants' identity and qualifications are verified.

### **3.2 DBS Disclosure and PVG Scheme Membership Procedures**

All paid staff and all volunteers that have regulated contact with **Into**University's young people must have a satisfactory enhanced DBS check. Those in Scotland undertaking regulated work with children must be PVG Scheme Members. The charity will ensure that all paid staff are registered on the online update service from March 2019. No unsupervised contact with young people or access to information regarding service users (including access to Salesforce) will be authorised until the DBS check or PVG Scheme Membership has been returned and approved. During this

period all staff and volunteers will be supervised by an **Into**University staff member who has undergone a satisfactory enhanced DBS check or is a PVG Scheme Member.

In advance of DBS clearance or PVG Scheme membership being received all staff and volunteers must complete a Disclosure Declaration Form. This form will be held securely by **Into**University. Any foreseen disclosure should be raised to the DBS or PVG Scheme Manager at this stage.

In the event a DBS application or PVG Scheme membership returns an adverse disclosure or a self disclosure is made by a volunteer or staff member, further consideration will need to be given to the applicant. The DBS or PVG Scheme Manager and Safeguarding Team will review and assess if this person is suitable to work with **Into**University's young people. If any external agencies need to be contacted, permission will be sought from the individual. If they are unable to reach an outcome or need further input, a Risk Assessment Panel will gather to review the information. The panel will include: the Trustee with responsibility for Safeguarding and a member of the Senior Management Team. They will include the Head of Safeguarding, PVG/DBS manager and Safeguarding Manager where appropriate.

The Risk Assessment Panel will make a decision on whether to employ the applicant as a paid member of staff or permit them to 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 and young people
- Legal advice
- Whether the applicant declared any offences on the Disclosure Declaration Form (see Appendix E), 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.

### **3.3 Training**

All Trustees, staff and volunteers undergo safeguarding training during their training and induction period that is applicable to their role. Staff and volunteers will not be able to work independently with service users without attending the safeguarding training; until this is attended, they will need to be supervised while working with children and young people.

If a former staff member or volunteer returns to work or volunteer with the organisation, despite any

former relationship, they will be treated as a new joiner and will receive an enhanced DBS check or PVG Scheme membership check, references collected and given applicable safeguarding training.

### **3.4 Probation**

Staff cannot pass their probation unless they have completed their Safeguarding Training or without all relevant safer recruitment checks being signed off.

### **3.5 Staff Welfare**

We recognise that working with children and young people who are victims of abuse can be challenging and impact staff and volunteer wellbeing. **IntoUniversity** offers the following support mechanisms:

- Access to Employee Assistance Programme
- Line manager support
- Promotion of helplines such as NSPCC

## **4. Allegations against staff and volunteers**

**IntoUniversity** promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the organisation (including volunteers, visitors and contractors) are dealt with promptly and appropriately enabling the organisation to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the organisation are clear about professional boundaries, and act in accordance with the ethos and values of the organisation.

### **4.1 Low level concerns**

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the organisation may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- humiliating children

It is crucial that any such concerns are shared responsibly and with the right person, and recorded and dealt with appropriately - see section 4.3 for reporting.

#### **4.2 Allegations**

Keeping Children Safe in Education 2022 states that allegations meeting the harms threshold might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children. They may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations can be made by anyone including colleagues, volunteers, parents/guardians, children/young people and community/external staff and all should feel safe to express them without fear of victimisation.

#### **4.3 Procedure for allegations against staff and/or volunteers**

It is essential that all low level concerns and allegations of safeguarding misconduct regarding staff should immediately and confidentially be reported to a member of the Senior Management Team either by contacting them by phone at **Into**University Head Office on 0207 243 0242 or by emailing a member of SMT directly. The Senior Management Team will manage the investigation and may consult the Safeguarding Team and Trustee with responsibility for Safeguarding if appropriate.

Low level concerns and allegations of safeguarding misconduct against a volunteer should be immediately brought to the attention of the Centre Leader/Project Manager and the Volunteer Manager. The Volunteer Manager will escalate all concerns to a member of the Senior Leadership Team. The Senior Leadership Team will manage the investigation with support from the Senior Management Team and may consult the Safeguarding Team if appropriate.

The following action should be taken in the event of an allegation:

- Make sure that the child or young person is safe and away from the alleged perpetrator.
- Refer the matter immediately to the Senior Management Team for staff or the Centre Leader and/or Volunteer Manager and Senior Leadership Team Member for a volunteer. They will advise on next steps and will lead the investigation. It is the responsibility of the reporting staff member to ensure that the concern has been received and acknowledged by the appropriate member of SMT/Centre Leader/Volunteer Manager within a timely manner.
- If you cannot make contact with a member of the Senior Management Team about allegations against staff (e.g annual leave) please contact a member of the Senior Leadership Team or HR team and explain that you have a staff allegation that you

need to pass on and they will make contact with a member of the Senior Management Team.

- The Senior Management Team will discuss and consider the need for a referral to the Local Authority.
- The charity may consider it necessary, taking into account the nature of the concern and/or taking into consideration the employee/volunteer's wellbeing, to limit the scope of the employee/volunteer's activities until the matter has been resolved
- Follow advice given regarding contact with the parents/carers if the alleged victim is a person who has not yet reached the age of sixteen (Scotland) or eighteen (England).
- Consider whether the alleged perpetrator has access to children, young people or vulnerable adults elsewhere and if so who needs to be informed and if the member of staff is a PVG Scheme member whether or not a referral to Scottish Ministers is required.
- **IntoUniversity** will work closely with the Local Authority as well as the police in following procedures.
- **IntoUniversity** will follow an external investigation with an internal review to promote better safeguarding practices.
- **IntoUniversity's** disciplinary procedures may be implemented, irrespective of the action that is taken by social care or the police.
- **IntoUniversity** will keep a record of all low level concerns, allegations, investigations and reviews. Staff conduct will be managed and recorded by **IntoUniversity's** HR team and volunteer conduct should be recorded by the Centre Leader on the volunteer's Salesforce record.
- In the event of a staff member being in breach of the Safeguarding Policy **IntoUniversity** will follow the disciplinary rules and procedures outlined in the staff handbook

#### **4.4 Whistleblowing Policy**

**IntoUniversity** has a clear whistleblowing procedure, found in the staff handbook and referenced in staff training, and promotes a culture that enables issues about safeguarding and the welfare of children and young people to be addressed.

#### **5. Internet and device safety**

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

**IntoUniversity** is aware of the increased risk to children and young people when using online platforms and aim to keep children and young people safe by:

- Providing clear and specific directions to staff and volunteers on how to behave online

- Supporting children and young people using our service to use the internet, social media and mobile phones in a way that keeps them safe
- Supporting parents/carers to do what they can to keep their children safe online
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour
- Reviewing and updating the security of our information systems and online platforms regularly
- Providing safe devices to children and young people which have had the appropriate filtering systems and software in place
- Ensuring that images of children and families are used only after permission has been obtained, and only for the purpose for which consent has been given
- Providing supervision, support and training for staff and volunteers about online safety
- Risk assessing any online platforms or new technologies before they are used within the organisation and producing usage and conduct guidance for staff, volunteers, children and young people

See **Into**University's Online Safety Policy for more information - see appendix A

## **6. Confidentiality and Information Sharing**

**Into**University understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe and we are therefore committed to multi-agency working. Staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children and should do so with support and advice from the Safeguarding Team. If you are unsure of when it is appropriate to share information, please speak to the Safeguarding Team.

All information regarding safeguarding incidents and concerns is stored centrally on **Into**University's database (Salesforce) and not on individual devices. Safeguarding concerns and disclosures will only be shared in circumstances that will further protect the child from harm. When information is being shared, it is done so in a safe and secure way such as via secure email or password protected databases or documents.

## **7. Parental/Guardian Involvement**

**Into**University recognises the role of parents and guardians when safeguarding children and young people and seeks to include them in conversations if it does not pose further risk to the child or young person. Whenever it is safe and possible, parental consent is sought to make referrals to Local Authorities or external agencies and staff should aim to update parents/carers throughout safeguarding cases.

Permission is always obtained in advance for all onsite and offsite activities from the person with parental responsibility.

## **8. External Opportunities and Third Party Providers**

**Into**University may promote external opportunities and third party programmes if we feel that they will benefit our children and young people's education and experience, including but not limited to online webinars, residentials, work placements or apprenticeships. For external opportunities where **Into**University staff will not be present, **Into**University will carry out due diligence checks on third party providers.

If **Into**University is recruiting students for these external opportunities, the following must be checked before promoting to our students:

- The service upholds good safeguarding standards and has appropriate safeguarding policies and reporting procedures in place. If there are any safeguarding concerns about a third party provider, these must be flagged to the Safeguarding Team.
- Parents/carers are informed and consent is given for children and young people under the age of 18

For external opportunities that **Into**University may advertise to young people but do not recruit for and where **Into**University staff will not be present, the following must be checked before promoting to our students:

- The service is safe and appropriate for the age group and the level of need
- The child/young person and the parent/guardian are fully aware that this is an external opportunity and **Into**University staff will not be present

If a staff member is unsure if the service or opportunity is safe for students, they should seek support from the Safeguarding Team before promoting it to children and young people or their guardians.

When student enrichment work placements are arranged, the host organisation will receive and sign a Safeguarding Guidance Agreement (see appendix A8). The parent/guardian of students under 18 years receives a Work Experience Letter outlining safeguarding and health and safety before giving parental consent (see appendix A9). The student signs a Student Agreement which includes health & safety and safeguarding expectations as well as an escalation process if they feel the placement is unsafe (see appendix A10).

## **9. Risk Assessments**

**Into**University's risk assessments cover all staff and volunteers who work and interact with children and young people as part of the service. In preparing risk assessments for off-site visits, staff should ensure that other agencies, where appropriate, have a risk assessment in place.

**Into**University staff and volunteers are expected to dynamically risk assess during all activities and delivery and highlight hazards and mitigations. These should be added to risk assessments when necessary.

Individual risk assessments will be completed for a child or young people with extenuating circumstances to ensure they can participate in on and off-site activities safely. Cases where an individual risk assessment is needed could include, but are not limited to, young people showing violent or behaviours that may pose a risk to themselves or others, self harm or external dangers such as prohibited parental contact. Individual risk assessments should be written and shared with the Centre Leader, Safeguarding Team and discussed with the parent/carer and child/young person when it does not cause further risk to do so.

## **10. Children Potentially at Greater Risk of Harm**

Whilst all children should be protected, it is important that we recognise some groups of children are potentially at greater risk of harm. Keeping Children Safe in Education 2022 states the following as children and young people potentially at greater risk of harm:

- Children who need a social worker (Child in Need and Child Protection Plans)
- Children requiring mental health support - if staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy.
- Children missing from education or those opting for Elective Home Education (EHE) - EHE can be a positive experience for a child and is not always a safeguarding concern but it does mean that children are less visible to the services that are there to keep them safe and supported.
- Looked after children, previously looked after children, care leavers and care experienced young people
- Children with special educational needs and disabilities or physical health issues - additional barriers can exist when recognising abuse and neglect in this group of children
- Children who are lesbian, gay, bi, trans or queer (LGBTQ) - the fact that a child or young person may be LGBTQ is not in itself an inherent risk factor for harm. However, children who are LGBTQ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ.

**IntoUniversity** recognises that these children and young people may be at a higher risk of experiencing safeguarding concerns and abuse. **IntoUniversity** requests information about students' needs during the registration process and records them via our safeguarding procedures if disclosed at another time.

As each student is unique, centres create and offer support which will work for that particular student and record any additional support being utilised. It is imperative that staff consider that behaviours displayed may be a sign or indicator of possible abuse or a safeguarding concern.

## **11. Glossary of Safeguarding Terminology**

**11.1 Safeguarding:** Safeguarding is the action that is taken to promote the welfare of children and protect them from harm and is defined in “Working Together to Safeguard Children 2018” as:

- protecting children from maltreatment;
- preventing impairment of children’s mental and physical health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

**11.2 Children/young people:** A child is defined as anyone who has not reached the age of 18. This is enshrined in UK law and the UN Convention of Human Rights. For the purposes of this policy and relevant procedures the term “child” and “young person” are used to mean the same thing.

In Scotland, the definition of a child varies in different legal contexts, but statutory guidance which supports the Children and Young People (Scotland) Act 2014, includes all children and young people up to the age of 18. Where concerns are raised about a 16 or 17 year old, agencies will need to consider which legislation or guidance is appropriate to follow, given the age and situation of the young person at risk. In Scotland, regulated work with children is defined at Schedule 2 of the Protection of Vulnerable Groups (Scotland) Act 2007 and usually includes caring responsibilities, teaching or supervising children and/or protected adults, providing personal services to children and/or protected adults or working directly with children and/or protected adults

**11.3 Vulnerable adult:** An adult at risk of abuse or neglect is defined as someone who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs and is unable to protect themselves.

Safeguarding vulnerable adults is defined in the care and support statutory guidance issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse and neglect;
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect;
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action;
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being.

In an **Into**University context vulnerable adults may be (but are not limited to) 18+ students, parents/guardians or other family members of students.

**11.4 Children's Social Care:** 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 Centre Leader should ensure that they are familiar with the systems operated by their Local Authority. In Scotland, Local Authority social work departments have responsibility for social service functions with regard to children.

## **12. Internal Roles and Responsibilities**

**12.1 The Trustees** should have clear oversight of how safeguarding and protecting people from harm are managed within the organisation and it is their responsibility to ensure that appropriate Safeguarding Policies and procedures are in place.

**12.2 The Safeguarding Trustee** has oversight of **Into**University's Safeguarding policy and procedures, and responsibility for promoting the safeguarding of children, young people and vulnerable adults within the charity.

**12.3 The Chief Executive** is responsible for ensuring that the Safeguarding policies and processes are implemented within **Into**University as a whole and providing appropriate staff and volunteer training where necessary. The Chief Executive is a member of the Safeguarding Team.

**12.4 The Safeguarding Manager is the Designated Safeguarding Lead (DSL).** The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety) for the organisation which includes providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children. They are responsible for internal staff training, keeping the charity abreast of current legislation and best practice, and overseeing quality records of all incidents and all referrals to external agencies.

**12.5 The Safeguarding Team are Deputy Designated Safeguarding Leads (DSLs).** They are experienced staff who deputise the DSL when the Safeguarding Manager is not available. They support, consult and liaise as the Safeguarding Team to promote safeguarding best practices.

**12.6 The DBS/PVG Scheme Manager** is responsible for ensuring that all employed staff have a current DBS clearance. The PVG Scheme Manager for Scotland is responsible for ensuring that all relevant staff in Scotland are members of the PVG Scheme.

**12.7 Centre Leaders are Designated Safeguarding/Child Protection Officers (DSO/DCPOs) for their centre.** They are responsible for the implementation of the safeguarding policies in their centres and the enactment of safe working practices. They manage safeguarding cases in their centre and undertake the responsibility to alert and follow the guidance given to them by the Safeguarding Team. They should be aware of their Local Authority Child Protection Teams and referral processes. Centre Leaders are also responsible for ensuring volunteers at their centre have the necessary DBS checks carried out for the role they are undertaking.

**12.8 Programme Managers** are responsible for the implementation of the safeguarding policies in their programme and the enactment of safe working practices. Programme Managers manage safeguarding cases in their programme and undertake the responsibility to alert and follow the guidance given to them by the Safeguarding Team. Programme Managers are also responsible for ensuring volunteers have the necessary DBS checks carried out for the role they are undertaking in their programme.

*All staff and volunteers are responsible for safeguarding children, young people and vulnerable adults. They should be diligent in immediately sharing suspicions or disclosures with the Centre Leader and/or the Safeguarding Manager/ Team.*

## **13. External Roles and Responsibilities**

**13.1 The Local Authority Designated Officer (LADO)** in England and Wales is responsible for managing all allegations made against staff and volunteers who work with children and young

people in their specific locality. The LADO may also be contacted by the charity as a source of advice. In Scotland, contact with the Local Authority social work department should be made.

**13.2 Local Authority Social Care.** Each Local Authority will have a team overseeing safeguarding within its area. Any concerns that meet the threshold for reporting to the Local Authority must be referred to the authority that the child or young person resides in. If a member of staff is unsure if the Local Authority need to be informed, they can consult with the Safeguarding Team for advice

**13.3 Police.** Can be contacted on 101 (non-emergency) or 999 (emergency) if there is a direct disclosure of serious or immediate harm. If a member of staff is unsure if the police need to be called, they can consult with the Safeguarding Team for advice.

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

## 14. Appendices

Appendix A: Supporting Policies and Documents

Appendix B: KCSIE Indicators of Abuse and Neglect

Appendix C: Safeguarding Process Map and Safeguarding Team Contacts

Appendix D: Legislative Framework and National and Local Guidance

### Appendix A: Supporting Policies and Documents

The below Policies and Documents should be read in conjunction with the Safeguarding Policy. Volunteers do not need to read those applicable to staff only.

1. Staff Handbook (see PeopleHR - staff only)
2. [Child on Child Abuse Policy](#)
3. [Safer Visiting Policy](#)
4. [Online Safety Policy](#)
5. [Child Facing Safeguarding Policy](#)
6. [Social Media Policy Addendum](#) (staff only)
7. [Physical Intervention Procedure](#) (staff only)
8. [Work Placement: Host Organisation Agreement](#) (staff only)
9. [Work Placement: Parent/Guardian Letter](#) (staff only)
10. [Work Placement: Student Agreement](#) (staff only)

Please note these are linked documents and are only available to **Into**University staff and volunteers via our shared online folders. If you need access please contact the safeguarding team via [safeguarding@intouniversity.org](mailto:safeguarding@intouniversity.org) or speak to your Centre Leader. All policies can be found in the shared [Safeguarding Folder](#).

### Appendix B: KCSIE Indicators of abuse and neglect

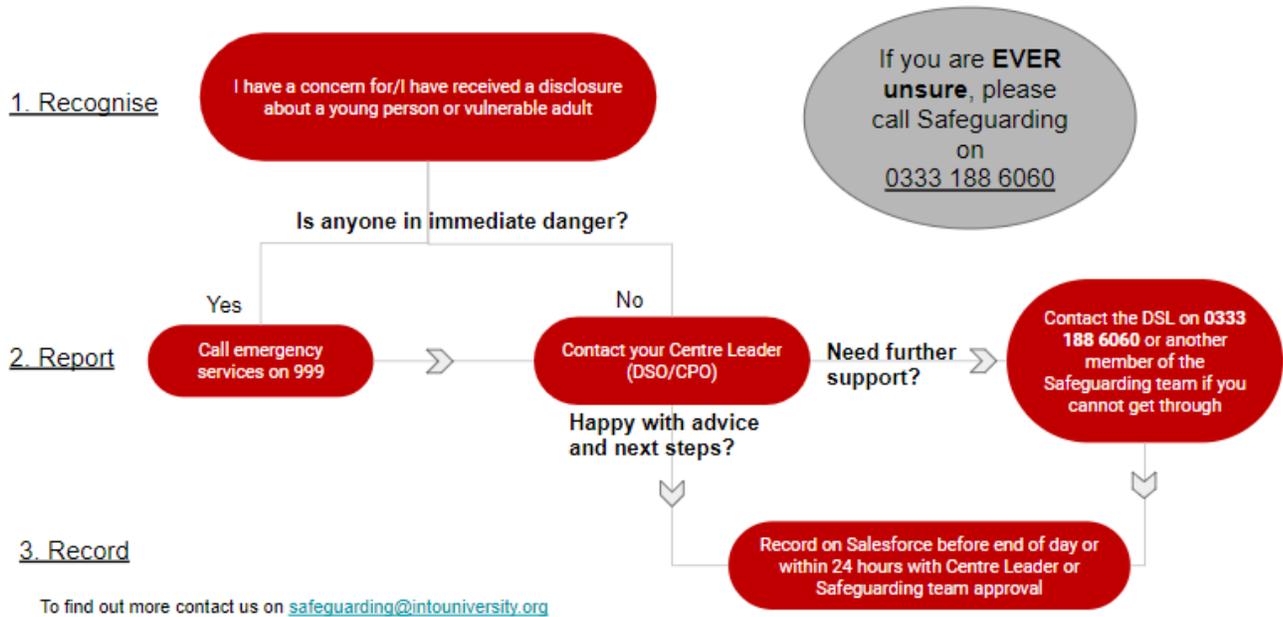
**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Please see [Keeping Children Safe in Education 2022](#) paragraph 26-30 for more information on the indicators of abuse and neglect.

## Appendix C: Safeguarding Process Map and Safeguarding Team Contacts



# Safeguarding Process Map



## Your Safeguarding Team



If you need support or advice on a safeguarding concern, please contact the on duty Designated Safeguarding Lead on

**0333 188 6060**

In an emergency call **999**



**Kelly Wainhouse**  
Head of Safeguarding  
Designated Safeguarding Lead (DSL)  
07720 162192

### Deputy Designated Safeguarding Leads (Deputy DSLs):



**Sophie Houghton**  
Head of Programme Delivery & Operations (North of England & East Midlands)  
07759 128 726



**Ellie O'Donnell**  
Assistant Director of Operations  
07707 285 528



**Hottie Baines**  
Regional Operations Manager  
07514 656 966



**Eily Rundle**  
Head of Operations (Impact and Strategy)  
07718 124 388



**Lydia Satter**  
Regional Operations Manager  
07817 800417



**Hannah Starr**  
Deputy Designated Safeguarding Lead  
07513 828 093

### Safeguarding Management and Governance:



**Rachel Carr**  
Chief Executive Officer  
07817 822759



**Hannah Purkiss**  
Director of Operations  
07514667746



**Clare Richards**  
Safeguarding Trustee

Please note that changes in the Safeguarding Team may occur prior to the next policy review. It is the responsibility of Centre Leaders to ensure the most recent version of the Safeguarding Team map is on display in centres.

# Your Local Safeguarding Team

It is our mission at **IntoUniversity** to ensure every student is kept safe

If you need help, support or advice on a safeguarding concern, please speak to any **IntoUniversity** staff member or contact the Safeguarding Team on **0333 188 6060**

In an emergency call 999

**Bethan Wooldridge**  
Bristol South's Centre  
Leader and  
Designated Safeguarding  
Officer (DSO)  
*0121 803 7505*



**Kelly Wainhouse**  
Head of Safeguarding  
Designated Safeguarding  
Lead (DSL)  
*0333 188 6060*

To find out more contact us on [safeguarding@intouniversity.org](mailto:safeguarding@intouniversity.org)

## Appendix D. Legislative Framework and National and Local Guidance

The **Into**University Safeguarding Policy references [Keeping Children Safe in Education 2022 which can be read here.](#)

The legislative bases for protecting Children and Young People are the Children Acts of 1989 and 2004 and the Children (Scotland) Act 1995. 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.

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.

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 1953.

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 Safeguarding Team should be contacted in the event that any staff member has a concern about a child or young person being vulnerable to being drawn into terrorism and all Centre Leaders are familiar with the Channel Programme.

In Scotland, the Scottish Government has provided policy guidance under Getting it Right for Every Child (GIRFEC) which approach is **child-focused** - it ensures the child or young person – and their family – is at the centre of decision-making and the support available to them; **is based on an understanding of the wellbeing of a child in their current situation** - it takes into consideration the wider influences on a child or young person and their developmental needs when thinking about their [wellbeing](#), so that the right support can be offered; **is based on tackling needs early** - it aims to ensure needs are identified as early as possible to avoid bigger concerns or problems developing; **requires joined-up working** - it is about children, young people, parents, and the services they need working together in a coordinated way to meet the specific needs and improve their wellbeing. The key principles are that children are SHANARRI:

- Safe
- Healthy
- Achieving
- Nurtured
- Active
- Respected
- Responsible
- Included

### **National and Local Guidance**

The Government's 'Working Together to Safeguard Children', sets out how statutory and voluntary agencies should work together to promote the safety and welfare of Children and Young People. In Scotland, GIRFEC applies.

In addition each Local Authority will have its own local guidance. Each **Into**University Centre Leader should be familiar with this guidance and consult with the Safeguarding Team if the local guidance raises any issues for **Into**University's Safeguarding Policy and practice.