

IntoUniversity Safeguarding Policy

for Children, Young People and Adults at risk of Abuse or Neglect

Policy Management

Policy Owner/Author	Kelly Wainhouse, Head of Safeguarding (Designated Safeguarding/Child Protection Lead)
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1. Our Policy

1.1 Policy Statement

IntoUniversity 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 adults at risk 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 adults at risk may be included in these practices.

1.2 The purpose of this policy:

- To protect the children, young people and adults at risk who engage with **IntoUniversity** 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.

1.3 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 **IntoUniversity**.

1.4 Legal Framework

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

- Children Act 1989 (and 2004 amendment)
- Children (Scotland) Act 1995
- The Care Act 2014
- Human Rights Act 1998
- Working Together to Safeguard Children 2018
- National guidance for Child Protection in Scotland 2021
- Keeping Children Safe in Education 2023
- Scottish Government policy: Getting it Right for Every Child (GIRFEC)

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

1.5 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, parents/guardians, and other agencies is essential in promoting young people's welfare.
- Adults at risk may also require safeguarding support although this policy will mainly refer to children and young people. See Appendix E for the principles of adult Safeguarding.

1.6 We seek to keep children, young people and adults at risk safe by:

- Valuing, listening to, and respecting them.
- Employing a Head of Safeguarding who is the Designated Safeguarding/Child Protection Lead (DSL/DCPL) and appointing a wider Safeguarding Team of Deputy Designated Safeguarding/Child Protection Leads consisting of senior leaders and managers.
- Ensuring Safer Recruitment Processes are in place.
- Ensuring that those we employ and who work with children, young people and adults at risk are DBS checked or members of the Protection of Vulnerable Groups Scheme (PVG Scheme) and designating a DBS and PVG Scheme Manager.
- 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.
- Recording and storing information professionally and securely, and in Scotland in accordance with the Disclosure Scotland Code of Practice.
- Sharing our safeguarding processes with students, their families, staff and volunteers and ensuring they know how to raise a concern.
- Promoting multi-agency working where concerns are escalated and relevant information shared with appropriate agencies to ensure safety. Children, young people, adults at risk, 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 and volunteers 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 disclosures will be taken seriously and managed appropriately following **Into**University's safeguarding procedures. **Into**University recognises that whilst some incidents and disclosures 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 or neglect 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 do not let the child or young person leave our care until the Centre Leader/Safeguarding Team have assessed that it is safe to do so.
- Inform the Centre Leader or equivalent manager (e.g. the Programme Manager) as soon as practically possible¹. 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 Head of Safeguarding (DSL/DCPL) or a member of the Safeguarding Team (Deputy Designated Safeguarding/Child Protection Lead) during delivery hours. If you are expecting to deliver programmes outside of the normal delivery hours, you must arrange Safeguarding on-call cover with the Safeguarding Team prior to the event.
- The Head of Safeguarding/Safeguarding Team along with the centre team will assess the current safety and next steps which may include making a referral to the Local Authority Social Care, contacting parent/guardian, 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. Referrals should always be followed up in a timely manner as advised by the Safeguarding Team.
- If the concern is relating to a child, it should be shared with their parent/guardian and their consent sought if applicable, unless it would 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 the consent of the parent/guardian and they should be informed as soon as possible.
- 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).

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

- 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 Centre Leader/Programme Manager, with the support of the Centre team and Safeguarding Team, 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/Child Protection 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), child-on-child 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. 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 in our care, the Safeguarding Team should be contacted immediately for support and advice. The age of criminal responsibility is 10 in England and 12 in Scotland. If they are under the age of criminal responsibility, they cannot be arrested and staff should inform the police of the child's age.

3. Supporting Staff and Volunteers

3.1 Recruitment and Onboarding

IntoUniversity 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 (including Academic Support Tutors and Mentors) 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 staff and all volunteers in England that have regulated contact with **IntoUniversity's** young people must have a satisfactory Enhanced DBS check (with Child Barred list) and the charity will ensure that all paid staff are registered on the online update service. All staff and all volunteers in Scotland undertaking regulated work with **IntoUniversity's** young people must be PVG Scheme Members. 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 **IntoUniversity** 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 **IntoUniversity**. Any foreseen disclosure should be raised to the Disclosures 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 Disclosures Manager and HR will review and assess if this person is suitable to work with **IntoUniversity'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: two members of the Senior Management Team and where appropriate the panel may seek input from the Trustee with responsibility for safeguarding, the Head of Safeguarding and/or the Head of People and Culture.

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, 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.

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. Any exceptions to this will require sign off by the Senior Management Team.

3.3 Training

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

3.4 Probation

Staff can only pass their probation if they have completed Safeguarding Training and have completed all relevant safer recruitment checks.

3.5 Staff Welfare

We recognise that working with children, young people, and adults at risk who are victims of abuse can be challenging and can impact staff wellbeing. **Into**University offers the following support mechanisms:

- Access to an Employee Assistance Programme
- Line manager and HR 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 Local Authority Designated Officer (LADO).

It is essential that all low-level concerns regarding adults working in or on behalf of the charity (including staff, volunteers, visitors, contractors and trustees) are reported as soon as possible - please see the Low-Level Concerns Policy in section 3 of the staff handbook for more information and for the reporting procedure.

4.2 Allegations

Keeping Children Safe in Education 2023 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 they 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 allegations of safeguarding misconduct regarding staff should be immediately and confidentially reported directly to a member of the Senior Management Team by phone or email. The Senior Management Team will manage the investigation and may consult the Safeguarding Team/Trustee if appropriate.

Allegations of safeguarding misconduct against a volunteer should be immediately brought to the attention of the Centre Leader/Programme Manager and the Volunteer Manager. The Volunteer Manager will escalate 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/Project 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/Project 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 adults at risk elsewhere and if so consider if a referral to the LADO or to Scottish Ministers is required.
- **IntoUniversity** will work closely with the Local Authority as well as the police in following procedures.
- **IntoUniversity** will follow any 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 adults at risk while using its services from the risks posed by the internet, use of email, messaging, video conferencing and social networking.

IntoUniversity is aware of the increased risk to children and young people when using online platforms and aim to keep them 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/guardians 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
- Having a named person (Head of Data & Impact) responsible for deciding what is allowed and blocked by our filtering systems and documenting decisions and reasoning on what is blocked/allowed
- 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 training and resources to 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. Record Keeping and Information Sharing

IntoUniversity 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 and, when safe to do so, with the consent of the child and their parent/guardian. 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. If you are unsure of how to share information about a safeguarding case safely, please contact the Safeguarding Team.

7. Parent/Guardian Involvement

IntoUniversity recognises the role of parents/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/guardians throughout the safeguarding process.

8. External Opportunities and Third Party Providers

IntoUniversity 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 webinars, residentials, work placements, and/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 in England or 16 in Scotland.

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 parents/guardians.

When student enrichment work placements are arranged, the host organisation and parent/guardians of students under the age of 18 receive and sign a Safeguarding Guidance Agreement. 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.

9. Risk Assessments

IntoUniversity'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 external providers, where appropriate, have a risk assessment in place.

IntoUniversity staff and volunteers are expected to dynamically assess risk during all activities and respond appropriately to any hazards and adhere to 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 displaying 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/guardian 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 2023 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 who are absent 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.

- Children requiring mental health support - this can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Looked after children, previously looked after children, care leavers and care experienced young people.
- Children with special educational needs, disabilities (SEND) or health issues - additional barriers can exist when recognising abuse and neglect in this group of children.
- Children who are LGBTQIA+ - the fact that a child or young person may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, children who are LGBTQIA+ can be targeted by others. In some cases, a child who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+.

IntoUniversity recognises that these children and young people may be at a higher risk of experiencing harm and staff should therefore be aware of children and young people with these risk factors and consider how we support them and their individual needs.

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.

11.2 Child Protection: 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.

11.3 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 a young person between the age of 16 and 18 requires support and protection, services will need to consider which legal framework best fits each persons’ needs and circumstances. The National guidance for child protection in Scotland gives more detail about this and explains how

professionals should act to protect young people from harm in different circumstances (Scottish Government, 2021).

11.4 Adult at Risk: See appendix. E for Adult Safeguarding definitions and principles

11.5 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.

11.6 Parent/Guardian: The birth or adoptive parent, legal guardian, or other person having responsibility for, or legal custody of, a child. When working with young people and their families, we may use the term 'Adult at Home' to promote inclusive language but due to legal definition we continue to use parent/guardian in this policy.

12. Internal Roles and Responsibilities

12.1 The Trustees are required to take steps to protect everyone who comes into contact with their organisation from harm (Charity Commission for England and Wales, 2019; Charity Commission for Northern Ireland, 2019; Scottish Charity Regulator, 2018).

12.2 The Safeguarding Trustee is the lead person responsible for overseeing safeguarding and child protection including oversight of **Into**University's Safeguarding policy, procedures and training.

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 Head of Safeguarding is the Designated Safeguarding/Child Protection Lead (DSL/DCPL). The Designated Safeguarding/Child Protection Lead should take lead responsibility for safeguarding and child protection 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 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/Child Protection Leads

(DSL/DCPLs). They are experienced staff who deputise for the DSL/DCPL when the Head of Safeguarding is not available. They support, consult and liaise as the Safeguarding Team to promote safeguarding best practices.

12.6 Disclosures Manager is responsible for ensuring that all staff and all volunteers that have regulated contact with young people have an approved Enhanced DBS check (England) or are members of the PVG Scheme (Scotland).

12.7 Centre Leaders are Designated Safeguarding/Child Protection Officers (DSO/DCPOs) for their centre/programme. 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 that their volunteers have the necessary DBS checks carried out/PVG Scheme membership 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.

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 needs 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 Team and Safeguarding Process Map Posters

Appendix D: Legislative Framework and National and Local Guidance

Appendix E: Adult Safeguarding

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. [Physical Intervention Procedure](#) (staff only)
7. [DBS New starter SG flowchart](#) (staff only)
8. [PVG New starter SG flowchart](#) (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 or speak to your Centre Leader/Programme Manager. 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 2023](#) paragraph 26-30 for more information on the indicators of abuse and neglect.

Appendix C: Safeguarding Team and Safeguarding Process Map Posters

SAFEGUARDING TEAM



Call the Safeguarding Team on
0333 188 6060
(available during core delivery hours) for support and advice regarding safeguarding concerns.
In an emergency, call emergency services on 999.

KELLY WAINHOUSE
Head of Safeguarding
(Designated Safeguarding Lead)
07720 162192

DEPUTY DESIGNATED SAFEGUARDING LEADS

HOLLIE BAINES
Regional Operations Manager
07514 656 966

LYDIA SALTER
Head of Student Opportunities
07759128529

DAISY RAE
Head of Programme Delivery and Operations
07720160724

SOPHIE HOUGHTON
Head of Programme Delivery and Operations
07759 126 725

ELLY RUNDLE
Head of Operations (Impact and Strategy)
07718 124 388

EILIS O'DONNELL
Director of Programmes and Delivery
07707 285 528

MANAGEMENT & GOVERNANCE

RACHEL CARR
Chief Executive Officer
07817 822759

ZOE BYRNE
Chief Operating Officer (mat cover)
07523 270879

CLARE RICHARDS
Safeguarding Trustee

safeguarding@intouniversity.org

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

SAFEGUARDING PROCESS MAP

RECOGNISE

I have a concern for/I have received a disclosure about a child, young person, or adult at risk

Is anyone in immediate danger?

YES

NO

Call Emergency services on 999

REPORT

Contact the Centre Leader/Programme Manager

I need further support/my manager is not available

I am happy with the next steps

Call the Safeguarding Team on
0333 188 6060
(available during core delivery hours) for support and advice regarding safeguarding concerns.

RECORD

Record on Salesforce before end of day or within 24 hours with Centre Leader/Programme Manager or Safeguarding Team approval

Appendix D. Legislative Framework and National and Local Guidance

The **Into**University Safeguarding Policy references [Keeping Children Safe in Education 2023 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.

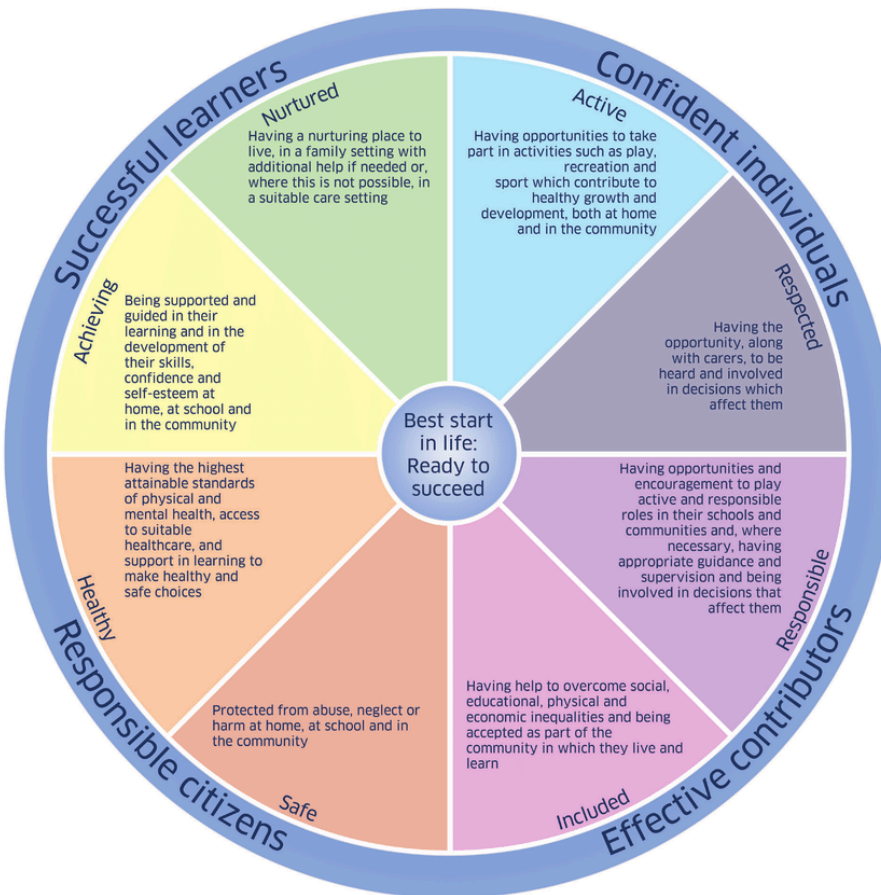
Sections 36 to 41 of the Counter Terrorism and Security Act 2015 sets out the duty on local authorities, schools and organisations to provide support for people vulnerable to being drawn into terrorism. This is known as the Channel programme. The Safeguarding Team should be contacted in the event that any staff member has a concern about a child or young person being vulnerable to being drawn into terrorism and all Centre Leaders have completed PREVENT training.

In Scotland, the Scottish Government has provided policy guidance under Getting it Right for Every Child (GIRFEC), the 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:



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.

Appendix E. Adult Safeguarding

The Care Act 2014 defines safeguarding as “protecting an adult’s right to live in safety, free from abuse and neglect”.

The Care Act 2014 states that an adult at risk is someone over 18 years old who:

- (a) has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) is experiencing, or is at risk of, abuse or neglect, and
- (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

The Adult Support and Protection (Scotland) Act 2007 states that “Adults at risk” are adults who:

- (a) are unable to safeguard their own well-being, property, rights or other interests,
- (b) are at risk of harm, and
- (c) because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

The definition of an adult at risk includes people aged 16 and over with disabilities and or mental disorders, illness, or physical or mental infirmity and who are at risk of harm from themselves or others. Those working with adults at risk should pay particular attention to the needs and risks experienced by young people in transition from youth to adulthood, who are more vulnerable to harm than others. As other legislation and provisions exist which include persons up to 18 (and sometimes up to age 26 or even beyond), support under these other provisions may be more appropriate for some young persons. The responsibilities of the council and other agencies for persons aged 16-18 will extend beyond adult protection legislation.

Confidentiality

It is important to remember when working with adults that we should protect their confidentiality, meaning we would not inform parents/guardians of safeguarding concerns unless we had doubts about the individual’s capacity.

Capacity

Having capacity means that a person is capable of making their own decisions. Principle 1 of the Mental Capacity Act 2005 states that everyone is capable of making their own decisions if they are given enough time, information and support, unless proven otherwise. A lack of capacity should never be assumed based on a person’s circumstances.

It is essential that a staff member who doubts an individual’s capacity to make a decision contacts

the Safeguarding Team for support or advice before taking actions on the individual's behalf.

Consent

Consenting to something means that a person must give their permission for it to happen. Consent should always be sought when safeguarding adults. The principle of consent is related to capacity because if a person does not have mental capacity then they cannot give fully informed consent.

At **Into**University we strive for a person-centred approach where we support the individual to make choices using the six principles of Adult Safeguarding.

In circumstances where there is an immediate risk of harm, or where the situation involves risk to someone under 18, consent and confidentiality may be overridden.

The 6 Principles of Adult Safeguarding

➤ **Principle 1 Empowerment** - Individuals are supported to make their own decisions as far as it is possible for them to do so. Individuals who are empowered are more likely to retain independence and are therefore less reliant on others and are less likely to be subject to abuse.

"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

➤ **Principle 2 Prevention** – It is better to take action before harm occurs.

"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

➤ **Principle 3 Proportionality** – Individuals should be enabled to take positive risks with the least restrictive response, as long as this maintains their safety.

"I am sure that the professionals will work for my best interests, as I see them and they will only get involved as much as I require."

➤ **Principle 4 Protection** – Individuals should be given support and representation when they need it.

"I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able."

➤ **Principle 5 Partnership** – Organisations should work closely together to better ensure positive outcomes. The sharing of information should be in line with the individual's needs, ensuring that anything pertaining to abuse is taken seriously and acted on.

"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together to get the best result for me."

➤ **Principle 6 Accountability** – Everyone should be aware of their own role and the part they play in safeguarding.

“I understand the role of everyone involved in my life.”