

# Policy, Procedures and Guidance for Safeguarding and Protecting Children and Young People

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# **Policy, Procedures and Guidance for safeguarding and protecting children, young people and young adults**

## **POLICY STATEMENT**

### **Aim**

The purpose of this policy statement and procedure is to enable the Albert Kennedy Trust (AKT) to ensure to the best of its ability that the children, young people and young adults who access its services are safeguarded from abuse. Their welfare shall always be paramount to the organisation, and AKT is committed to safeguarding all children and young adults that come into contact with our work. We believe that all children and young adults have an equal right to protection from abuse and neglect regardless of their age, race, religion, ability, gender, language, background or sexual identity.

Although AKT does not have a responsibility and is not able to institute child protection proceedings and legal action to safeguard adults, it does have a duty to record and report child protection or adult safeguarding concerns, to run its services safely, and to build and nurture a safe culture within the organisation.

### **Introduction**

The Albert Kennedy Trust (AKT) is the UK's LGBTQ+ Youth Homelessness Charity. Its fundamental belief is that 'No young person should have to choose between a safe home and being who they are'.

AKT focuses on prevention and early action, and provides safe homes, mentoring, training, advocacy and support to young people who are homeless or living in a hostile environment after coming out to their parents, care givers and peers.

At its four regional centres across England, AKT provides online and face-to-face services. At a national level, it also provides a digital support service to any young person across the UK.

AKT has traditionally worked with the 16-25 age group, and this remains its primary audience. However, our new online service has reached a small number of young people aged 13-15. AKT is aware that children and young people may hide their true age in order to access services, to protect their anonymity or for other reasons.

### **The Legal Context of our Safeguarding Practice**

AKT takes account relevant guidance and legislation (See Appendix 4) to safeguard the children and young people we work with, and to support our staff and volunteers to work safely.

- Where our services extend beyond England into the rest of the UK, we ensure that we operate in accordance with the legislative framework of the nation in which we are operating.

### **Underlying Principles**

This policy statement defines a child or young person as anyone under the age of 18 and recognises that:

- The welfare of the child is paramount in all decisions regarding children and young people, as enshrined in the Children Act 1989
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Some groups of children, such as some with disabilities or some from minority ethnic backgrounds or experiencing poverty, can be excluded or suffer racism from mainstream services.
- Working in partnership with children, young people, and, where appropriate, their parents, carers and other agencies, is essential in promoting young people's welfare.

Many of the young adults aged 18 and over who AKT supports may be vulnerable due to homelessness or rejection by their families. They may also have care and support needs related to issues such as disability, illness, capacity, mental health, substance misuse and trauma.

The principles outlined above in relation to children and young people under 18, also apply to our work with young adults. In terms of a legal framework, the arrangements for those over 18 are governed by the Care Act 2014. This Act stipulates that safeguarding duties apply to an adult who:

- has care and support needs, and
- is experiencing, or at risk of, abuse or neglect, and,
- as a result of those care and support needs, is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

We enable our staff, volunteers and those who work with us to make informed and confident decisions that safeguard the children, young people and young adults we work with. And we support them to take all suspicions and allegations of abuse, emotional abuse and neglect seriously. We expect everyone working with us (staff, trustees, volunteers, mentors, students on placement, carers and anyone working on behalf of AKT) to have read, understood and adhere to this policy, guidance and related procedures.

### **How we implement and enact our policy statement**

AKT will endeavour to protect children and young adults in its care. In order to do this, AKT staff will:

- Value, listen to and respect children and young adults, ensuring that for young adults, we obtain their consent unless 'vital interests' (as defined under GDPR) are at stake, or the person has been assessed as lacking mental capacity (as defined in the Mental Capacity Act 2005);
- Take leadership responsibility at senior board level and via a clear line of accountability for our safeguarding arrangements, including the appointment of a Designated Safeguarding Officer (DSO) and two Deputy DSOs;
- Adopt this policy and adhere to our associated procedures and code of conduct and good practice for staff, volunteers, mentors, students on placement, carers and anyone else working on our behalf;
- Develop and implement effective social media, communications and IT policies and related procedures;
- Ensure that in all our digitally based services, we adopt high standards of safeguarding, commensurate with the standards used in our face-to-face services
- Operate a 'safe' recruitment policy and procedure when appointing trustees, staff, volunteers and mentors. This includes the requirement for individuals to obtain criminal records checks from the Disclosure and Barring Service for eligible posts (renewable every two years) and the completion of all other elements of our recruitment procedure;
- Record and store information promptly, professionally and securely, in line with the Data Protection Act 2018;
- Share information about safeguarding and child and young adult protection with our workforce and trustees promptly, ensuring that staff are trained in safeguarding and supervised adequately, carry out their roles competently and that they work in an environment where they feel able to raise concerns and feel supported in their safeguarding role;
- Ensure that children, young people, and young adults are able to raise concerns where they exist and are aware of our policy on safeguarding adults and protecting children and young people;
- Share concerns about children and young adults appropriately and without delay with agencies and individuals who need to know, in accordance with our procedures for sharing information;
- Ensure that staff, trustees, volunteers, mentors, carers and others working on behalf of AKT are fully informed about the processes for dealing with concerns about possible abuse;
- Adopt a clear policy around the management of allegations against members of our workforce and trustees;
- Ensure that all members of our workforce and our Board of Trustees, and anyone working on behalf of AKT know the name of the Designated Safeguarding Officer, their Deputies and their role;
- Ensure that all members of our workforce and our Board of Trustees, and anyone working on behalf of AKT understand their responsibilities in being alert to the signs of abuse and for referring any concerns to the Designated Safeguarding Officer;
- Create and maintain an anti-bullying environment, and ensure that we have a policy and procedure to help us deal effectively with any bullying that does arise;

- Ensure that we have effective complaints and whistleblowing measures in place;
- Ensure that we provide a safe physical environment for our children, young adults, staff, volunteers, mentors and carers, by applying health and safety measures in accordance with the law and regulatory guidance;
- Ensure that we provide a safe digital environment for our children and young adults, within our centres, while using their own and/or AKT devices. We do not currently use filtering controls on devices, as they prevent access to some helpful content for our young people. Ensure that we are aware of our regulators' and funders' expectations around our safeguarding practice and that we adhere to these;
- Seek and take account of the views of the child or young adult as much as feasibly possible, whilst also safeguarding their welfare and responding with appropriate haste to any situation where there is a serious, direct risk posed to a child or young person;
- Work in a multi-agency context, to efficiently safeguard the child or young adult with care and support needs;
- Ensure that there are clear effective channels of communication between all staff, volunteers and service users;
- Positively promote the rights of service users, volunteers, staff and trustees;
- Support any person wishing to make an allegation;
- Follow the law and statutory requirements that provides protection to AKT service users, volunteers and staff.

**This policy statement should be read alongside our policies and procedures on**

- Recruitment, induction and training
- Role of the Designated Safeguarding Officer
- Dealing with disclosures and concerns about a child or young adults
- Managing allegations against staff and volunteers
- Recording, record storage and retention
- Confidentiality and information sharing
- Code of conduct for staff and volunteers
- Safer recruitment
- Social Media
- Communications and IT
- Safe use of images
- Anti-bullying (including cyber-bullying)
- Complaints
- Whistleblowing and public interest disclosure
- Health and safety
- Training, supervision and support
- Lone working policy and procedure
- Quality assurance

**Contact details**

Designated Safeguarding Officer

Name Lucy Wasdell-Bowyer, Director of Services

Phone/email Lucy@akt.org.uk

Deputy DSO

Name Hayley Speed, Assistant Director of Services

Phone/email [hayley@akt.org.uk](mailto:hayley@akt.org.uk)

Deputy DSO

Name Lara Datta, Digital Services Manager

Phone/email [lara@akt.org.uk](mailto:lara@akt.org.uk)

Senior Trustee Lead for Safeguarding

Name Helen Johnson

Phone/email [helenjohnston76@yahoo.com](mailto:helenjohnston76@yahoo.com)

CEOP

[www.ceop.police.uk](http://www.ceop.police.uk)

NSPCC Helpline

0808 800 5000

We are committed to reviewing this policy and procedures biannually, updating our processes as appropriate.

This policy was last reviewed on 3<sup>rd</sup> November 2021

Signed: Lucy Wasdell-Bowyer

Date: 3<sup>rd</sup> November 2021

## **GUIDANCE**

The young people and young adults with whom AKT works may experience any of the forms of abuse listed in this guidance and in the guidance that relates to adult abuse. However, it is worth noting that some LGBTQ+ young people are at additional risk of a number of forms of harm, including serious bullying, self-harm and mental health issues.

In addition, young people who face homelessness for whatever reason have already had their well-being compromised and are vulnerable to all the various risks that homeless people face in terms of health, poverty, becoming victims of crime, drug and alcohol misuse, and exploitation of various kinds. A number of young people involved with AKT have also become involved in the sex industry and are vulnerable as a result. In addition, we also support young people who identify as Black and People Of Colour and acknowledge the systemic racism continues to oppress, invalidate, and deeply affect their lives.

Our staff and volunteers must be particularly vigilant to these risks that so many of our young people face, as well as to the various other forms of abuse and neglect to which any child or young adult may be subjected.

### **1. Understanding Child Abuse**

#### **Abuse and Neglect of children**

Abuse and neglect are forms of maltreatment of a child or young person under the age of 18. They may result in a child suffering or being likely to suffer significant harm. Somebody may abuse or neglect a child by inflicting harm (commission), or by failing to act to prevent harm (omission).

Children can experience abuse in any environment, including within family, in an institutional or community setting and online. It may be perpetrated by those known to the child or by a stranger. In cases of online abuse, the absence of physical contact does not mean that the abuse has less of an impact on the child and should be responded to appropriately and in line with this safeguarding policy. Both online and offline, children may be abused by an adult, or another child or children.

The 2018 government guidance on 'Working Together to Safeguard Children' (<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>) defines various forms of abuse, including:

- **Physical abuse**
- **Emotional abuse**
- **Sexual abuse**
- **Neglect**
- **Abuse of a position of trust**
- **Child sexual exploitation**
- **Criminal exploitation and gangs**
- **Domestic abuse**

PLEASE NOTE that whilst young people under 18 will be eligible for domestic abuse services, a safeguarding referral to the relevant local authority's Multi-Agency Safeguarding Hub (MASH) will still need to be made in line with statutory and organisational requirements.

**Click on the link below to access information and advice on different types of child abuse, how to spot the signs and what you can do to help keep children safe:**

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>.

## **2. Understanding Young Adult Abuse**

There are many different types of adult abuse, including:



**Physical**  
**Sexual**  
**Emotional and psychological**  
**Organisational**  
**Discrimination**  
**Financial and material**  
**Neglect and acts of omission**  
**Online**

Click on the link below to access information and advice on different types of adult abuse, how to spot the signs and what you can do to help keep vulnerable adults safe:

<https://www.nhs.uk/conditions/social-care-and-support-guide/help-from-social-services-and-charities/abuse-and-neglect-vulnerable-adults/>

It should be noted that the legislation and guidance make it clear that this list is not exhaustive and that those working with adults with care and support needs should be open to the possibility of other forms of abuse.

In its work with young adults AKT draws on a set of principles that reflect its approach to information sharing including consent, capacity and confidentiality. These are:

- **Empowerment** – supporting the young adult to make their own decisions and informed consent
- **Protection** – support and representation for those in greatest need
- **Prevention** – it is better to take action before harm occurs, including signposting to agencies that can help
- **Proportionality** – proportionate and least intrusive response appropriate to the risk presented
- **Partnership** – local solutions through services working with their communities
- **Accountability** – accountability and transparency in delivering safeguarding

### **Specific factors relevant to safeguarding young people as distinct from older people**

- Young people do not suddenly stop needing safeguards when they reach their 18th birthday – their legal status might change but independence is a gradual process that starts at birth and goes on well into adulthood.
- New challenges arise when a young person enters the adult world. This is an exciting time for anyone but creates the potential for new risks and new areas of vulnerability. Many young people are moving away from home for the first time, or starting work or volunteer placements. Most are starting to take full control of their finances, and many are starting relationships with adult partners. Some are becoming parents.

- Service providers, including AKT, continue to have a duty of care to the young people that use their services, even after those young people are 18. However, young adults who may have previously received health or local authority services (for example, those who have been 'in care' or 'looked after' by a local authority) may find that on attaining 18 years, these services are withdrawn and they are in danger of 'falling through the net' and of being denied services they require on an ongoing basis.
- Some young adults are 'at risk' or 'vulnerable' to a greater extent than most others due to issues already listed. These risk factors may exist singly or in combination, and, in some cases, could be triggered by or exacerbate the vulnerability of young people who are already trying to deal with the normal pressures of young adult life; there may be complex causal pathways and relationships between some of the various factors
- A young adult (or indeed anyone) who may be considered by others to be at risk, may not think of themselves as vulnerable, and may in fact feel insulted at being viewed in this way. It is, therefore, important to take into account the perceptions and feelings of young adults whom you deem to be vulnerable but who prefer not to be placed in this category. Care and sensitivity should be used if you find that there are safeguarding concerns relating to them.
- Some young adults at risk of abuse are also parents and their children (or unborn children) may also be at risk of abuse or harm.

## PROCEDURES

### Role of the Designated Safeguarding Officer

hayley@akt.org.uk

**AKT's Designated Safeguarding Officer (DSO)** is the person assigned as AKT's representative in child, young people and young adult protection and safeguarding issues. The name of our DSO is Lucy Bowyer, Director of Services.

Lucy can be contacted via

Lucy Bowyer, Director of Services

Phone /email 07718701329 [Lucy@akt.org.uk](mailto:Lucy@akt.org.uk)

In Lucy's absence, the Deputy DSO, Hayley Speed or Lara Datta can be contacted

Hayley Speed, Assistant Director of Services

Phone/email 07584177608 [Hayley@akt.org.uk](mailto:Hayley@akt.org.uk) [hayley@akt.org.uk](mailto:hayley@akt.org.uk)

Lara Datta, Digital Services Manager

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**The AKT Designated Safeguarding officer** has responsibility for:

- Overseeing the preparation and implementation of the child protection and vulnerable adults policy (safeguarding policy), ensuring it is regularly reviewed;
- Reporting concerns of abuse to the statutory authorities (Children or Adult Social Care or the Police).
- Ensuring that all members of the workforce, trustees, and anyone working on behalf of AKT are aware of and understand our policies and procedures and the relevant multi-agency procedures for working with children and young adults and keeping them safe;
- Being a point of contact within AKT members of the workforce, trustees, and anyone working on behalf of AKT in relation to safeguarding young adults and child protection;
- Being aware of local statutory safeguarding procedures and networks;
- Keeping informed and up to date on relevant changes in the law and national safeguarding guidance;
- Receiving and responding to information from staff and creative practitioners who have a safeguarding concern about a child or adult;
- Making decisions about whether to refer potential safeguarding and child protection situations to an investigating agency, and then making those referrals;
- Consulting with a statutory child protection and safeguarding adults agency and/or, in the case of children, with the NSPCC Helpline, to test any doubts or uncertainty about the concerns;
- Managing allegations against staff, in consultation with the individual's line manager;
- Recording concerns and actions in the child protection or safeguarding adults log.

It is not the role of AKT or its Designated Safeguarding Officer to decide whether abuse

has taken place or not. It is, however, our role to ensure that concerns are shared with appropriate agencies and relevant action taken.

## **Dealing with concerns**

### **How concerns about abuse might arise**

There are a number of ways in which a member of staff, volunteer, mentor or carer might become concerned that a child or young adult is being abused or is at risk of abuse.

- A child or young adult may disclose abuse or exhibit behaviour that suggests that they or someone else is being abused or at risk of significant harm
- It should be noted that a child or young adult may report abuse or risk to a third party when in fact they may be talking about themselves and testing what will happen or the type of response they may receive
- A family member or carer may raise concerns about a child or young person
- Another staff member, volunteer, mentor or third party colleague may raise concerns about a child or young adult
- A family member or carer may behave in a way that raises concerns that they might present a risk to a child or young person
- There may be concerns that a member of staff, volunteer or someone working for AKT may have abused a child or young adult or may present a risk
- A young person or young adult (or an older relative or carer) may disclose historical abuse that suggests that the person is still suffering harm as a result of the abuse and/or that other members of the family or social circle are still at risk or long-term survivors of the abuse
- Something that a young person shares or posts online, or sends in a message, that may be seen by a member of staff / volunteer / other young person.

### **Responding to concerns about possible abuse**

In accordance with national child protection statutory guidance (Working Together 2018), and with multi-agency safeguarding procedures, AKT has a responsibility to report any potential safeguarding concerns and/or alleged abuse of a person under the age of 18 to a statutory agency.

In cases concerning vulnerable young adults, AKT will act in accordance with the terms of The Care Act 2014 and the associated Care and Support Guidance, as well as in keeping with multi-agency safeguarding procedures for adults and AKT's own values.

In line with the decision of the Law Lords in *Gillick v West Norfolk* (1985), AKT believes that if a young person has sufficient understanding and intelligence to be capable of making their own informed choices, then the young person's views should normally take precedent. However, all incidents or concerns which pose an immediate and serious risk, either to the young adult themselves or to another person, will be reported to the relevant authorities without consent. The following procedure will be used:

#### **1. Safety is paramount**

If anyone acting for or employed by AKT has reason to believe that a child or young adult may be suffering abuse or is at risk of abuse, then the safety and welfare of that, and any other child/young adult likely to be affected, is the paramount consideration in deciding what action needs to be taken.

## **2. Direct disclosures**

If the concerns take the form of a direct disclosure by a child or young adult, the staff member should listen carefully, giving the person undivided time and attention. The person should be reassured that they have done nothing to deserve being abused and that reporting it demonstrates courage. Verbal reassurance needs to be backed up by supportive non-verbal behaviour such as attentiveness, empathy and an avoidance of any language or gestures that may demonstrate shock, impatience or disbelief. The aim is to facilitate the disclosure (but not to cross-examine) in order to determine whether there is real cause for concern. The responsibility for undertaking any investigation lies with the relevant local authority. The person should be informed that the concerns will need to be shared with the DSO.

## **3. Discussion with the Deputy DSO**

The concerns must be discussed with the Deputy Designated Safeguarding Officer. If the Deputy DSO is absent, or the disclosure is about a volunteer or staff member, then the Designated Safeguarding Officer should be contacted on the same day that the concerns emerge. The recorded log on Inform should focus on:

- The date and time of the interview or disclosure or emergence of the concern
- The child's or young adult's account (if available)
- Any physical or other signs of injuries noted, e.g. bruising
- Any relevant background information
- An assessment made by the staff member as to why the information given constitutes a child or adult protection concern (including risk to others as well as to the child or adult at the centre of the concern)
- What the child or young adult would like to happen (if known)
- In the case of a young adult, whether they have given consent to the information being shared outside the organisation
- In the case of a young adult, whether there might be issues of mental capacity to give consent to information sharing
- In the case of a young adult, whether they might be being coerced into withholding consent to information sharing
- Whether there might be 'vital interests' at stake or a duty of care that might override the young adult's decision to withhold consent to information sharing (see para 7 below)
- Action already taken by the staff member
- Agreed next steps and who should be informed. This should include the staff member's manager within AKT

## **4. Making a record**

Information concerning the disclosure, or any other child protection concerns or concerns about safeguarding young adults, should be recorded on the same day, using the Safeguarding Task feature on Inform (see Appendix or the standard Reporting Template included below for those who don't have access to Inform).

## **5. Sharing of record with DSO**

The record should be completed on Inform and assigned to the Deputy/Designated Safeguarding Officer, also on the same day. If the Reporting Template is used it should be marked confidential and emailed to the Deputy/DSO.

## **Making referrals when there are concerns about possible abuse or risk of abuse**

Using the child's or young person's current postcode, click this link to check which local authority you need to contact: <https://www.gov.uk/find-local-council>

### **6. In an emergency**

If the personal safety of a child or adult is immediately threatened, it is vital that urgent action is taken as soon as possible on the same day. In the case of a child, this will mean contacting 999 or the Local Authority's Children and Families Multi Agency Safeguarding Hub. In the case of a young adult, it will mean contacting 999 or the Local Authority's Adults Multi Agency Safeguarding Hub.

### **7. Informing the person who is at possible risk and dealing with issues of consent**

If the person who is the subject of the concern is a child, they must be informed, whenever possible, about any action being taken on their behalf, the reason for this, and what is likely to happen. All efforts should be made to acknowledge how hard this may be for the child and to help them understand the need to seek help. Where choices and options can safely be offered regarding the way in which information is passed on, this should happen. There are exceptional circumstances where we would not tell the young person if it put them or someone else in more risk.

If the person who is the subject of the concern is an adult and clearly capable of consenting to the action being taken, that consent must be given unless 'vital interests' (as defined in data protection legislation) are at stake or there is a duty of care to pass on the information. These may be in situations where, for example, there is a risk to others, an immediate risk to the person themselves, the person is being coerced into withholding consent, or there is a likelihood that a crime is being committed.

Verbal consent from an adult should be backed up with written consent unless this would delay the sharing of the information and/or cause unwarranted anxiety to the adult.

If there is a concern that the adult may lack the capacity to provide consent the DSO should contact the local authority adult safeguarding team to seek expert advice; in addition, if it is perceived that the adult is at immediate risk, the emergency procedure outlined above should be followed straight away.

The adult who is the subject of the concern should be informed, whenever possible, about any action being taken on their behalf and what is likely to happen. If there is no immediate danger, it is advisable to give the young adult a little time to fully understand what action is being pursued and why, before proceeding. It is also important to operate in line with the principles of empowerment, protection, prevention, proportionality, partnership and accountability.

## **8. Making the referral**

If the discussion with the DSO leads to a decision to make a referral to the local authority (either children's social care or the adult safeguarding team), then this should be done within one working day of the decision being made.

The referral should be made over the telephone and followed up in writing within the same working day. Some local authorities have a standard referral form, and, if so, this should be used.

If the concern relates to any allegations or concerns about risk presented by a staff member, volunteer or third party colleague, the procedure for dealing with this should be followed.

### **After referral**

**9. Multi-agency working** AKT is committed to working in a multi-agency approach to safeguarding children and young people. AKT will engage with relevant Multi Agency Risk Assessment Conferences (MARAC) proceedings and plans, as well as attend Team Around the Child (TAC) meetings and any other multi-agency response required to protect the children and young adults we are working with.

AKT will actively approach relevant external agencies to provide additional support to clients suspected of being the victim of abuse and seek to provide children and young people with independent advocates for additional support, where appropriate.

## **10. Escalation**

If AKT is not satisfied that a referral has been responded to appropriately or within the timescale set out in statutory guidance and multi-agency procedures, we will escalate our concerns using the processes set out in those multi-agency procedures. This normally means contacting senior management within the statutory agency to whom the referral has been made. In the case of referrals involving children and young people under the age of 18, AKT may also consider using the NSPCC Helpline to support the referral and escalation process.

## **11. Logging and reviewing safeguarding incidents**

All safeguarding for Young People will be kept within inform. For concerns and information around peel not on our inform system a shared folder within share point will be used to store information safely and will include, details of the incident, action taken in response to the incident and the outcome. Diversity information is also recorded.

Reviews of all reported safeguarding incidents take place at least annually, involving representatives from frontline staff and managers. The findings of reviews inform our future safeguarding practice.

## **12. Retention and destruction of records**

Records of individual safeguarding concerns and subsequent actions must be stored securely within share point with restricted access by the DSO, CEO, and Lead Trustee for Safeguarding, plus anyone else authorised by them. These records should be retained for a period of 15 years. The period of retention may need to be longer if there has been a complaint in respect of the case or legal proceedings. The reason for keeping a record for



longer than 15 years must be documented so as to be in line with the principles of the Data Protection Act.

Records of safeguarding allegations and any subsequent processes against member of staff or volunteers must be retained by AKT, including for people who leave the organisation, at least until the person reaches 65 years, or for 10 years if that is longer. The records must be stored securely within SharePoint with restricted access by the DSO, CEO, Lead Trustee for Safeguarding, and anyone else authorised by them. Details of allegations that are found to be malicious should be removed from personnel records.

Once the requisite retention period has been reached all records should be destroyed using shredding and confidential waste or be electronically purged in accordance with AKT's Data Protection Policy. It is the responsibility of DSO to check when records are due for destruction and arrange to do this.

## **Dealing with allegations or concerns about possible risks of abuse presented by a staff member, or volunteer**

AKT will not tolerate abuse by staff or volunteers in any form. Any allegation or concern that a member of staff or volunteer may present a possible risk of abuse, will be fully investigated in accordance with AKT's procedure set out below.

AKT will also report any safeguarding concerns with young people or children who are related to young people working with AKT, where we have concerns that abuse may be taking place.

'Consent' by a child or young adult is not viewed by AKT as either a defence or excuse for abuse.

### **Staff and volunteers should report and record concerns that relate to other staff members, volunteers or trustees**

1. Any staff member, who receives an allegation or believes that a colleague may be behaving in way which presents a risk to children or young adults, or infringes the Code of Conduct, or may have presented a risk to children or young adults in the past, should immediately (i.e. within 24 hours) tell the DSO or, in their absence, the Deputy DSO.
2. Record the facts as you know them on the standard Recording Template and give a copy to the DSO. (Note: the DSO should also ensure that a copy is retained confidentially within the safeguarding incident log and on the individual's personnel file).

### **Remember: if the behaviour of a staff colleague, trustee, partner, agency staff, volunteer or anyone working on behalf of AKT causes you concern:**

- Do not ignore your concerns
- Do not confront the person about whom you have concerns
- Discuss your concerns with the DSO or, in their absence, the Deputy Designated Safeguarding Officer of AKT
- Do not delay in passing on concerns to someone who is in a position to take them forward
- Do not worry that you may have been mistaken. It is better to have discussed it with someone with the experience and responsibility to make an assessment, and you will not be penalised for any concern raised in good faith, even if it turns out to be unsubstantiated

**In the case of allegations against or concerns about a staff member or volunteer, an investigation may have three related strands:**

- If the allegation reaches the threshold of actual or potential abuse of an adult or child, the matter should be referred to Children's or Adult Social Care who will coordinate an investigation and examine the risk to any child or young adult involved or potentially involved
- Where circumstances warrant it, there may be a police investigation into a possible crime; this may need to take precedence over an internal investigation
- If it appears that allegations may amount to misconduct or gross misconduct, AKT's disciplinary procedures should be invoked.

It is essential that the information about the alleged abuse or risk is dealt with appropriately under each of these strands of investigation. The fact that a prosecution is not possible does not mean that action to safeguard the child or young adult is not necessary or not feasible. For example, an allegation may relate to prohibited behaviours or a breach of AKT's code of conduct. Even if these behaviours or concerns about risk may not lead to action on the part of Children's or Adult Social Care, they should, if they are an employee or volunteer of AKT, still be investigated and managed under AKT's disciplinary procedures.

The DSO, in consultation with the individual's manager and senior management in AKT, should inform the Local Authority's Social Care officer or team responsible for managing allegations (formerly known as the LADO) within one working day if there is a concern about possible risk or an allegation made against a member of staff, trustee, volunteer, mentor or anyone else involved with AKT. The discussion with the LADO (or similar officer) will, if necessary, initiate a multi-disciplinary approach to the concerns/allegations.

If an individual is removed from regulated activity with children or adults (or would have been removed if they had not left) because the person is considered by AKT to pose a risk of harm to vulnerable adults, AKT is obliged to make a referral to the Disclosure and Barring Service.

Any member of staff who is charged or questioned in connection with a criminal offence against a child or young adult receiving a service from AKT, or another child or adult, will be immediately suspended. Any volunteer will be withdrawn from duties. This suspension or withdrawal will remain in place until the outcome of any criminal proceedings is known or until the police eliminate the person from their enquiries or drop the investigation.

Staff about whom there are concerns should be given information to help them understand the concerns expressed, the processes being invoked and be informed of the outcome of any internal investigation and the implications for disciplinary processes.

The internal investigation should be completed as quickly as possible, consistent with its effective conduct. In any case involving a criminal investigation, the decision as to when to inform the suspect of the allegations should always be jointly agreed between the police and other relevant agencies.

Young people who have been allegedly harmed by a member of staff or volunteer, should be offered support and kept informed about the progress of the investigation (subject to police requirements and the need to respect confidentiality in relation to the alleged perpetrator). Subject to consent where the concern is about risk to a young person age 16 and over or a young adult aged 18 and over, support should also be offered to parents and carers of any child or young adult who has allegedly been harmed by a member of staff or volunteer working for AKT. They should be given information on any concerns, advised on the processes to be followed and informed of the outcomes, except in circumstances when the allegations involve the parent/carer directly. Professional advice should be sought as to what can be said to parents/carers.

All enquiries into allegations will be overseen by the DSO, Lead Trustee for Safeguarding, and CEO (they will agree the division of responsibility on a case-by-case basis). The lead person for the enquiry will liaise with police, Social Care, the Disclosure and Barring Service (if necessary), and other interested parties, and attend relevant meetings as required, keeping staff informed as appropriate.



## **Recruitment and training of staff and volunteers**

AKT recognises that our most important asset in fulfilling our aims and objectives as an organisation is our workforce. We therefore aim to recruit the best people possible to work with children, young people and young adults, and to build a safe organisational culture in which our staff and volunteers are well managed, and feel supported in raising concerns.

Our search to recruit the best people possible includes taking all reasonable steps to ensure that unsuitable people and those with an interest in harming children and young adults, are prevented from working with children/young people at AKT.

Our policy with regards to recruitment contains the following elements:

- advertising all posts through appropriate media and in a way that ensures that we attract high quality applicants from diverse backgrounds
- providing an application pack with relevant information for anybody who expresses an interest in an advertised job
- ensuring that all applications for both paid and volunteer positions are made using our standard application form
- involving more than one person to shortlist applicants for interview
- having at least two people conducting a face-to-face interview with anyone we may want to appoint
- incorporating the views and perspectives of children, young people, and young adults into the recruitment and selection process whenever appropriate
- obtaining two references and proof of right to work in the UK.,
- requiring that all staff and volunteers have an up-to-date relevant DBS check where their post is eligible for this (including a check against the barred list if the post involves regulated activity)
- providing an appropriate induction for all new staff and volunteers
- ensuring that all staff are made aware, during their induction period, of how to keep children and young people safe in our organisation
- appointing all staff and volunteers on a trial period initially, with a review before they are confirmed in post
- following a consistent procedure for recruitment, selection and induction.

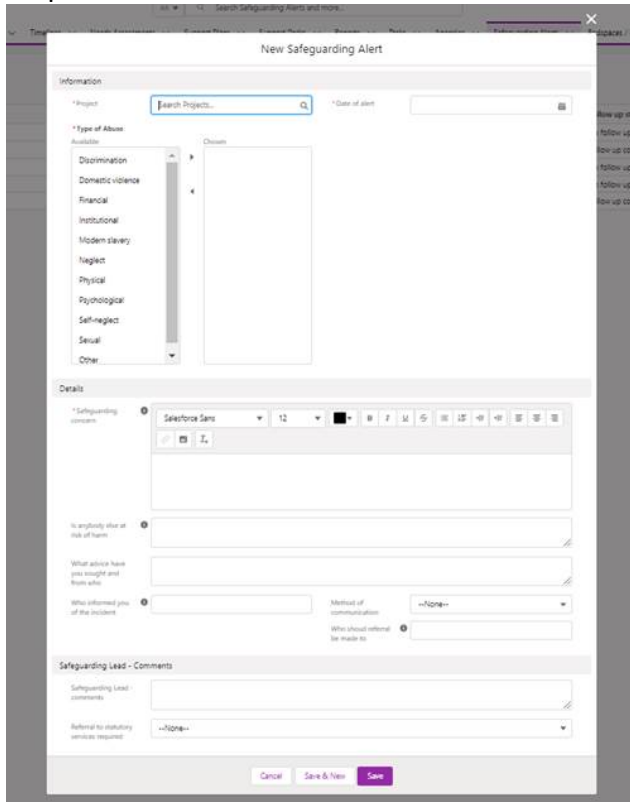
All staff, carers, mentors and volunteers will undergo safeguarding training as part of their induction at a level consistent with their role; this will be refreshed every two years. All AKT services staff will complete the basic level training for safeguarding children and young adults, offered by the relevant Local Safeguarding Board(s).

- All staff and volunteers who will be working with children/young people should complete a DBS application form for a check at the highest level for which they are eligible.

# Safeguarding Reporting Procedure for Inform

Staff with access to Inform should follow the actions below to record any Safeguarding incidents. An alert will be made to the DSO's and relevant managers on submission.

## Step one

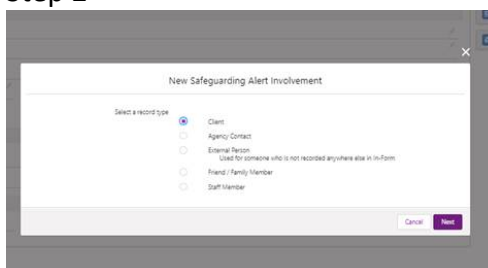


The screenshot shows the 'New Safeguarding Alert' form. It is divided into several sections:

- Information:** Includes a 'Project' search field and a 'Date of alert' field.
- Type of Abuse:** A list of abuse types (Discrimination, Domestic violence, Financial, Institutional, Modern slavery, Neglect, Physical, Psychological, Self-neglect, Sexual, Other) is shown on the left, and a 'Details' box is on the right.
- Details:** Contains a 'Safeguarding concern' text area with a rich text editor toolbar (font, bold, italic, link, etc.).
- Is anyone else at risk of harm?** A text input field.
- What advice have you sought and from who?** A text input field.
- Who informed you of the incident?** A text input field.
- Method of communication:** A dropdown menu with 'None' selected.
- Who should referral be made to?** A text input field.
- Safeguarding Lead - Comments:** A text input field.
- Referral to statutory services required:** A dropdown menu with 'None' selected.

At the bottom, there are three buttons: 'Cancel', 'Save & New', and 'Save'.

## Step 2



The screenshot shows the 'New Safeguarding Alert Involvement' form. It has a title bar and a close button. The main content area is titled 'Select a record type' and contains five radio button options:

- Client
- Agency Contact
- External Person  
Used for someone who is not recorded anywhere else in Inform.
- Friend / Family Member
- Staff Member

At the bottom right, there are two buttons: 'Cancel' and 'Next'.

## Step 3

**New Safeguarding Alert Involvement: Client**

**Information**

\*Safeguarding Alert: SA-000009  X Record Type: Client

\*Client:  Q

**Involvement**

\*Involvement: --None--

Involvement information:

Step 4

**New Task Custom: Safeguarding Follow Up**

**Information**

\*Task Name:

\*Safeguarding Alert: SA-000009  X Record Type: Safeguarding Follow Up

Client:  Q

To be completed by staff:  Q

To be completed by other:

\*Due date:

Completed date:

Completed:

**Actions to be taken**

Details:

**Outcomes**

Outcome of actions:

Step 5



### New Action: Safeguarding Work

**Information**

* Client	<input type="text" value="Search Clients..."/>	Record Type	Safeguarding Work
* Timeline	<input type="text" value="Search Timelines..."/>		
* Safeguarding Alert	<input type="text" value="SA-000009"/>	* Date	<input type="text"/>
Time	<input type="text"/>	* Time spent	--None--

**Details**

Communication method	One to one	Related agency contact	Search Agency Contacts...
Communication with	--None--	Related agency	Search Agencies...

**Work carried out**

Safeguarding Child Referral <input type="checkbox"/>	Safeguarding Adult Referral <input type="checkbox"/>
--	--

**Notes**

Subject	<input type="text"/>
Notes	<input style="height: 30px;" type="text"/>

## Safeguarding and Child Protection Reporting Template

### Restricted Information

This form should only be completed by those who do not have access to Inform whenever an issue or concern has arisen that needs reporting regarding a child or young person.

**TRY AND FILL FORM OUT AT THE TIME OF THE INCIDENT WHERE POSSIBLE.**

**Date:**..... **Time:**.....

**Name of person reporting:** .....

**Position:**.....

**Contact details of person reporting:**

**Reason(s) for report including names and details where known:**

*Continue on separate sheet and attach if necessary*

**Action(s) taken by person reporting:**

**Report received by The Albert Kennedy Trust Safeguarding Officer:**

**Signed.....Date & Time:.....**

**Action(s) taken by AKT Safeguarding Officer:**

**PLEASE ENSURE A COPY OF YOUR COMPLETED REPORT IS SENT TO THE DEPUTY SAFEGUARDING OFFICER OR DESIGNATED SAFEGUARDING OFFICER**

**Basic principles in reacting to suspicions, allegations and/or disclosures:**

<b>What To Do</b>	<b>What Not To Do</b>
Stay Calm.	Don't panic. Don't over-react. It is extremely unlikely that the person is in immediate danger.
Listen, hear and believe.	Don't probe for more information. Questioning may affect how the disclosure is received at a later date.
Give time to the person to say what they want.  Re-assure and explain that they have done the right thing in telling. Explain that only those professionals who need to know will be informed.	Don't make assumptions, don't paraphrase and don't offer alternative explanations. Don't promise confidentiality to keep secrets or that everything will be ok (it might not).
Act immediately in accordance with the procedure in this policy.	Don't try to deal with it yourself.
Record in writing as near as verbatim as possible what was said as soon as possible.	Don't make negative comments about the alleged abuser.
Report to the lead member of staff.	Don't gossip with colleagues about what has been said to you.
Record your report.	Don't make a child or young person repeat a story unnecessarily.

**Suggested everyday approaches to behaviour with Children and Young People:**

Use these as a checklist. Try those strategies that you have not used previously.

<b>Allow children/young people appropriate control</b>	In this way, children/young people will take responsibility for their own learning. Try giving them choices – for example, the order in which tasks are tackled or the resources they might use.
<b>Allow children/young people to make mistakes</b>	Children/young people do not make mistakes to annoy you. If they don't do what you've asked, it may be your explanation that was unclear. Try taking the blame for their mistake – for example, <i>'I didn't explain that very well – could I have another try?'</i> If children/young people are in a secure learning environment, they won't be worried about making mistakes.
<b>Don't over-react.</b>	Try not to respond to minor issues
<b>Show children/young people respect and you are more likely to receive it</b>	Model the behaviour you expect of the children/young people. Be polite, don't lose your temper, apologise if it is in order, and be honest when something upsets you. If a child/young person behaves inappropriately, concentrate on the actions rather than the person. Never ask why they did what they did because they often don't know. Ask, <i>'What do you think you did that upset me?'</i> <i>'What could (you, I, we) do to stop you doing that again?'</i>

**Relevant Legislation**

- The Children Act 1989, 2004
- The Safeguarding Vulnerable Groups Act 2006
- United Convention of the Rights of the Child 1991
- The Data Protection Act 2018 and GDPR
- The Human Rights Act 1998
- The Sexual Offences Act 2003
- The Protection of Freedoms Act 2012
- Serious Crime Act 2015 (particularly S67 – sexual communication with a child)
- Criminal Justice and Courts Act (S33 - revenge pornography (18+) made an offence)
- Working together to safeguarding children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2018
- The Care Act 2014
- The Care Act 2014 Care and Support Statutory Guidance (specifically the safeguarding section of this)
- The Mental Capacity Act 2005
- The Equalities Act 2010