



## SAFEGUARDING POLICY

**Safeguarding Officer:** Simon Sheehan – [simon.sheehan@therightcourse.org.uk](mailto:simon.sheehan@therightcourse.org.uk) 07974 229 183

**Trustee Responsible:** Ali Zaidi – [ali.zaidi@therightcourse.org.uk](mailto:ali.zaidi@therightcourse.org.uk)

**Contact full board on:** [trustee@therightcourse.org.uk](mailto:trustee@therightcourse.org.uk)

### Aim and purpose of Policy

The Right Course have a commitment for the promotion of Equality & Diversity for all our employees and learners. We aim to ensure that the culture and environment is one where individuals are treated with respect and dignity and solely on the basis of their ability.

The Right Course are committed to ensuring that all learners and employees should never experience abuse of any kind. All learners, regardless of age, disability, gender, race religious belief or lack of religion/belief, sexual orientation or identity, transsexual, married or civil partnership, pregnant or maternity leave have the right to protection from all types of harm or abuse. This policy will set out the mechanisms in place to ensure all colleagues discharge their duties and responsibilities to promote the welfare of all employees and learners and keep them safe.

All colleagues are expected to follow the Safeguarding Policy. The policy sets out how we deal with issues of peer on peer abuse, including bullying, and physical abuse, together with sexual violence or harassment, sexting or so called initiation ceremonies. In addition, it sets out how we support victims and perpetrators, that all abuse of this nature will be taken seriously, and never treated as banter.

### Policy Statement

We will seek to safeguard vulnerable beneficiaries by:

- Valuing them, listening to and respecting them.
- Adopting protection policies and a code of conduct for Board Members and volunteers.
- Recruiting volunteers safely, ensuring all necessary checks are made.
- Sharing information about safeguarding policies and good practice with Board Members and volunteers.
- Sharing information about concerns with agencies that need to know and involving as appropriate.
- Providing effective management for volunteers through supervision, support and training.
- We are also committed to reviewing our policy and good practice annually.

### Our Code of Behaviour

All Board members, partners and volunteers involved with The Right Course must:

- Treat all beneficiaries with respect.
- Provide an example of good conduct you wish others to follow.
- Ensure that, whenever possible, there is more than one adult present during activities with children, young people and vulnerable people or at least that you are within sight or hearing of others.

- Respect children, young people and vulnerable people right to personal privacy and encourage clients/participants/attendees to feel comfortable and safe enough to point out attitudes or behaviour they do not like. Remember that someone else might misinterpret your actions, no matter how well – intentioned.
- Be aware that physical contact with children, young people and or vulnerable people may be misinterpreted and should always be avoided.
- Recognise that special caution is required when you are discussing sensitive issues with children, young people and vulnerable people.
- Operate within the organisations principles and guidance and any specific procedures.
- Challenge unacceptable behaviour and report all allegations or suspicions of abuse.
- You should give guidance and support to inexperienced volunteers/partners.

You must not:

- Have inappropriate physical or verbal contact with children or young or vulnerable people.
- Allow yourself to be drawn into inappropriate attention-seeking behaviour or make suggestive or derogatory remarks or gestures in front of children, young people or vulnerable people.
- Jump to conclusions about others without checking facts.
- Either exaggerate or trivialise any abuse issue.
- Show favouritism to any individual.
- Rely on your good name or that of the organisation to protect you.
- Believe ‘it could never happen to me’.
- Take a chance when common sense, policy or practice suggests another more prudent approach.

### **What is abuse?**

It is generally accepted that there are four main forms of abuse. The following definitions are taken from “Working Together to Safeguard Children” (1999, Department of Health, Home Office, Department for Education and Employment). For purpose of this policy these definitions are applied to all beneficiaries working with The Right Course.

#### **1. Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, drowning or suffocating. Physical harm may also be caused when a parent/guardian or carer feigns the symptoms or deliberately causes ill health to a child, young or vulnerable person they are looking after, Physical abuse, as well as being the result of a deliberate act, can also be caused through the omission or the failure to act and protect.

#### **2. Neglect**

Neglect is the persistent failure to meet a child’s, young or vulnerable person’s basic physical and psychological needs, which is likely to result in serious impairment to health and development. It may involve a carer failing to protect a child, young or vulnerable person from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out important aspects of care, resulting in significant impairment of the child’s, young or vulnerable person’s health or development.

#### **3. Sexual Abuse**

Forcing or enticing a child, young or vulnerable person to take part in sexual activities, whether

or not they are aware of what's happening. This includes rape and all forms of sexual activity involving children, young or vulnerable people, including pornography and prostitution.

#### 4. Emotional Abuse

This is persistent emotional ill treatment which is likely to cause serious harm to the child's emotional development. This may involve conveying to children that they are worthless, unloved and inadequate and cause children to feel frightened, in danger, be exploited or corrupted.

### Recognising Abuse

There are a number of circumstances under which Board Members, Volunteers or Partners might have concerns that a child, young or vulnerable person has been or is being abused:

- A child, young or vulnerable person may tell about abuse they have experienced
- A third party – Board Members, volunteers, programme partner, parent, relative, carer, friend, neighbour, teacher - sharing concerns.
- Observing: ☒
  - A bruise or injury which is unusual, for example, on a part of the body which is not normally prone to such injuries (e.g. the cheeks)
  - Injuries which require but have not received medical attention
  - Cigarette burns or bite marks.
  - Unexplained changes in behaviour (e.g. aggression or becoming withdrawn)
  - Running away from home.
  - None attendance at projects or activities ☒
  - Reluctance to get changed or for example wearing long sleeves in hot weather.
  - The young person appears not to trust certain adults with whom you would normally expect them to have a close relationship.
  - The young person being discouraged or unable to make friends or from socialising with others.
  - The young person becoming unusually dirty or unkempt.
  - Changes to eating patterns.
  - Self harm or attempts to self-harm.
  - Sexually inappropriate behaviour or knowledge

The above list is not exhaustive

### What to do if someone discloses an abusive act or experience?

If a child, young person or vulnerable person confides to someone that they are being or have been abused they have placed that person in a position of trust.

The person concerned should: ☒

1. Be clear that they cannot keep secrets and that they have to pass on information if they think a child, young or vulnerable person has been or is being harmed in some way.
2. React calmly. Panic may frighten or silence the person.
3. Reassure the person they were right to tell.
4. Make it clear the child/young/vulnerable person is not to blame.
5. Take what is said seriously recognising that there may be difficulties in interpreting what is said by a child/young/vulnerable person.
6. Keep questions to an absolute minimum to ensure a clear and accurate understanding of what is being said.

7. Only ask questions in order to clarify what is being said. It is up to social services and the police to investigate the matter fully.
8. Make a full record of what is being said, heard or seen as soon as possible.
9. Do not delay in passing information on to the Board of trustees, police or social services.

### **Roles and Responsibilities**

It is not the responsibility of The Right Course to decide whether or not abuse has taken place. It is the responsibility of The Right Course (and all who work with) to act if there is cause for concern, in order that the appropriate agencies can investigate and take the necessary action to protect a child, young or vulnerable person.

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The legal framework differs depending on the age of the child, young person or the vulnerable person. Where your concerns relate to someone under the age of eighteen any suspicion, allegation or incident of abuse must be reported to the lead manager of the client organisation and the Board of Trustees of The Right Course the same working day.

If the person raising the concern is not happy with the response they receive or are unable to contact the relevant person within the organisation they should refer the matter to the Local Police Services.

It is important that detailed records of the allegation / incident / suspicion are made immediately. Only record information that is given freely by the child, young person or vulnerable person and do not prompt further questioning or make an assumption about what the complainant is trying to say. It is important to avoid making speculative comments that are not based on fact. Remember: It is possible that the notes you make will be accessible by third parties such as Social Services, The Police, The Courts and Solicitors.

The Board of Trustees of The Right Course has responsibility for deciding whether to refer the matter onto the relevant social services department and/or the police. Referrals should preferably be made the same working day and certainly within 24 hours.

It is the responsibility of the person who has made the referral to decide whether the parents / carers of the child, young or vulnerable person should be informed of the referral at this time. There may be instances where urgent medical attention is needed. In these circumstances you should always try consult with qualified first aiders but if time doesn't permit then immediate contact must be made with the emergency services.

### **Barriers to reporting abuse**

Some people have concerns about sharing confidential information. It would normally be considered good practice not to refer a child or young person to another agency without their knowledge and consent. However this principle of confidentiality can be overridden by a legal duty where there are child protection concerns.

## **Responding to allegations of abuse or inappropriate or dangerous behaviour**

Regardless of the age of the young person or vulnerable person, if an allegation of abuse or inappropriate conduct is made against a member of staff, or a person in a position of trust, then it must be reported to the lead manager of client organisation and the Board of The Right Course immediately.

Concerns about staff must be treated with the same rigour as other concerns. If there are concerns that abuse has taken place then this information will be passed to social services and/or the police for a full investigation. Senior managers / trustees will also need to refer to any disciplinary policy and procedure and decide whether the member of staff should be suspended pending a full investigation.

### **After an allegation**

After an allegation or suspicion about possible abuse has been investigated, there are likely to be strong feelings among the staff, service users, parents and maybe the wider community, which will need to be addressed. There are likely to be issues of:

- Communication – rumour or fact?
- Guilt and blame – if suspicions have been around for some time.
- Impact – on individuals, of the nature of what occurred and to whom

The senior management / trustees will give careful consideration to the best way of managing this.

### **What should I do if I am concerned?**

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Staff and volunteers at The Right Course who have any adult safeguarding concerns should:

#### **Respond**

- Take emergency action if someone is at immediate risk of harm/in need of urgent medical attention. Dial 999 for emergency services.
- Get brief details about what has happened and what the adult would like done about it, but do not probe or conduct a mini-investigation
- Seek consent from the adult to take action and to report the concern. Consider whether the adult may lack capacity to make decisions about their own and other people's safety and wellbeing. If you decide to act against their wishes or without their consent, you must record your decision and the reasons for this.

#### **Report**

- Name the person to whom staff/volunteers need to report any potential safeguarding concerns. This will usually be the organisation's designated safeguarding lead (see above).

#### **Record**

- Record details of the incident using the Incident Report Form (Annex 2) and share the Right Course' safeguarding lead (Trustee).
- Records should be written contemporaneously, dated and signed.
- The Safeguarding lead to record incident and follow up actions on the Incident Record Form. Records about safeguarding concerns are confidential and are stored in a location

where the alleged abuser will not have access to the record. Access should not be given to any unauthorised person for accessing confidential information including the sharing of passwords.

#### Refer

In making a decision whether to refer or not, the designated safeguarding lead should take into account:

- the beneficiaries' wishes and preferred outcome
- whether they have the mental capacity to make an informed decision about their own and others' safety
- the safety or wellbeing of children or other adults with care and support needs
- whether there is a person in a position of trust involved
- whether a crime has been committed

This should inform the decision whether to notify the concern to the following people:

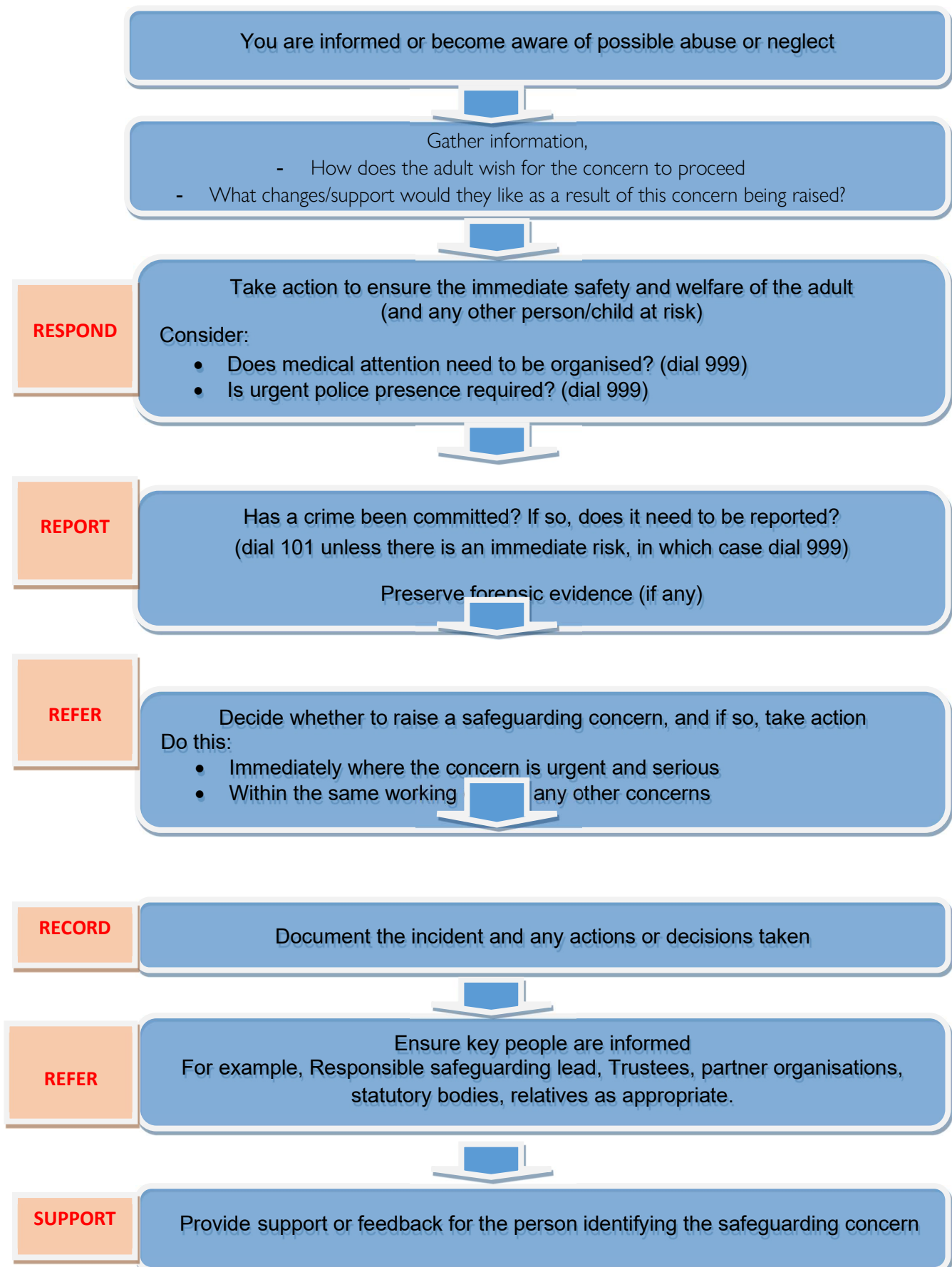
- the police if a crime has been committed and/or
- relevant regulatory bodies such as Care Quality Commission, Ofsted, Charities commission
- family/relatives as appropriate (seek advice from adult social services)
- The designated safeguarding lead should keep a record of the reasons for referring the concern or reasons for not referring.

Incidents of abuse may be one-off or multiple and may affect one person or more. Staff and volunteers should look beyond single incidents to identify patterns of harm. Accurate recording of information will also assist in recognising any patterns.

#### **Confidentiality and information sharing**

The Right Course expects all staff, volunteers, trustees to maintain confidentiality at all times. In line with Data Protection law, The Right Course does not share information if not required. It should however be noted that information should be shared with authorities if an adult is deemed to be at risk of immediate harm. Sharing the right information, at the right time, with the right people can make all the difference to preventing harm.

## Raising a safeguarding concern



### **Working with partner organisations**

The Right Course is committed to working in partnership with other agencies. If this should involve an agreement for another organisation on its behalf, The Right Course will ensure that the partner organisation has appropriate safeguarding policies in place which will include child, young persons and vulnerable persons protection policies and procedures, sound recruitment and selection practices and complaints procedures for service users.

The written agreement or protocol detailing the services to be provided should include the procedure to be followed in the event of concerns about abuse. The purpose of this is to ensure clarity as to which organisation is responsible for taking action in specific circumstances. If the delivery partner is responsible for taking action, the agreement should stipulate that The Right Course must be informed of all incidents.

The Right Course will create a safe culture by:

- Having appropriate supervision of staff, children, young people and vulnerable persons.
- Knowing who its service users are.
- Working in a safe building.
- Understanding how children, young people & vulnerable people communicate.
- Supporting parents or carers who wish to take part in activities.
- Ensuring appropriate checks are made on staff and volunteers.
- Having up to date client protection policies and procedures.
- Ensuring staff are trained appropriately

### **Responsibilities of the Safeguarding Officers**

Designated Safeguarding Officers are responsible for providing support, advice and expertise on safeguarding concerns, and are responsible for the investigation and reporting of serious safeguarding issues. They liaise with the Board where necessary, and make referrals to external agencies if needed.

Key aspects of their role include:

- Obtaining information from colleagues, volunteers, children, parents or carers who have concerns relating to the protection of children or vulnerable adults, and to record this information
- Assessing information quickly and carefully and asking for further information where appropriate
- Consulting with a statutory child protection agency e.g. the local social services department, to clarify doubts or worries
- Making referrals to statutory child protection agencies, adult social services or the police without delay
- Updating the Safeguarding records to ensure correctness and currency of information
- Maintain a current record of external agencies

The Safeguarding Officers will:

- Provide support, advice and guidance on safeguarding issues.
- Make enquiries into accounts of potential abuse and report allegations to the appropriate authorities.
- Report to the Board of Trustees, link with the wider programme team and programme partner where necessary.
- Maintain a single central record of concerns, and accurately record actions and updates.
- Make referrals to the necessary outside agencies or the police, to provide support at the earliest opportunity for those learners who are in need of safeguarding.

- Attend meetings with outside agencies to represent The Right Course and can be an advocate for learners.

### Responsibilities of the Board of Trustees

The Board of Trustees are responsible for ensuring that:

- The Right Course' Safeguarding policy and procedures are fully implemented and followed by Board Members, volunteers and partners.
- Safeguarding Officers have sufficient time and resources to carry out their roles.
- All colleagues feel able to raise concerns about the safety of children and vulnerable adults.
- Concerns are dealt with sensitively, effectively and in a timely manner.

The Right Course undertake to ensure that employees and volunteers are fit to work in our learning environments with children and vulnerable adults. We also reserve the right to refuse to employ staff who we believe may pose a risk to our learners.

The Right Course have systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new employees and require the following checks to be made on appointment:

- Documentary evidence checks to confirm nationality, residency and "right to work" status;
- Documentary evidence of qualifications;
- Satisfactory completion of the probationary period as defined in their letter of appointment.

This policy will be reviewed a minimum of annually and updated where necessary, and in line with statutory guidelines. The Board of Trustees meet regularly and reviews its procedures and processes. They maintain an open attitude to improvement to ensure they remain fit for purpose.

A procedure exists to review any serious concerns, and to immediately review/ change any poor or unsafe practice. We encourage the highlighting of potential failures in our policy by regularly asking for feedback on how concerns have been handled.

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Date Approved by trustees: 29<sup>th</sup> September 2020

Date of next policy review: September 2025

Date of Safeguarding Record reviews:

| Date    | Reviewed by |
|---------|-------------|
| 20.9.21 | S. Sheehan  |
| 14.9.22 | S. Sheehan  |
| 19.9.23 | S. Sheehan  |
| 25.9.24 | S. Sheehan  |

## Annex 1 - Safeguarding Record

| Date    | Incident Report Form<br>Complete | Issue                                        | Actions to take<br>(with deadlines) | Resolution |
|---------|----------------------------------|----------------------------------------------|-------------------------------------|------------|
| 20.9.21 |                                  | No reported issues from<br>29.9.20 – 20.9.21 |                                     |            |
| 14.9.22 |                                  | No reported issues from<br>20.9.21 – 14.9.22 |                                     |            |
| 19.9.23 |                                  | No reported issues from<br>15.9.22 – 19.9.23 |                                     |            |
| 29.9.24 |                                  | No reported issues from<br>19.9.23 – 29.9.24 |                                     |            |

## Annex 2 – Incident Report Form

Date for Completed: \_\_\_\_\_

Name and position of individual completing the Incident Form: \_\_\_\_\_

Beneficiary Involved: \_\_\_\_\_

Date of Incident: \_\_\_\_\_

Summary of Incident:

Permission given by Beneficiary to share details: \_\_\_\_\_

Next Steps (with deadlines):

Incident Report Form shared with (including time and date):

Resolution: