



# Safeguarding Policy



## INTRODUCTION

Steer Up is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults who participate in our activities. Children, young people and vulnerable adults should never experience abuse of any kind and we have a responsibility to promote the welfare of all individuals, to keep them safe and to practise in a way that protects them. We do this by ensuring that there are appropriate arrangements in place to enable us to discharge our duty to provide a safe and secure environment and to deal with issues concerned with suspected or reported abuse.

We recognise that the welfare of children, young people and vulnerable adults is paramount in all the work we do and the decisions we take. Working together with children, young people, their parents, carers and other professionals is essential in promoting people's welfare.

All children, young people and vulnerable adults, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse. We recognise that some children are additionally vulnerable due to the impact of previous experiences, their level of dependency, communication needs or other issues; and extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.

We will seek to keep children and young people safe by:

- Valuing, listening to and respecting them
- Appointing a nominated Safeguarding protection lead
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Developing and implementing an effective digital safeguarding policy and related procedures
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- Sharing information about safeguarding and good practice with everyone who interacts with Steer Up
- Ensuring all our users know where to go for help if they have a concern



- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- Building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns

We seek to ensure that our policy and procedures comply with statutory duties; reflect guidance and good practice in safeguarding children, young people and vulnerable adults; and that safeguarding arrangements are proportionate and based upon common sense. Steer Up recognises that we have a duty to help mentors, staff and volunteers recognise their responsibilities (through guidance, support and training), minimise risk and avoid situations (where possible) where abuse or neglect might be alleged.

We will ensure that processes are in place to check the suitability of mentors, staff and volunteers working directly with vulnerable adults, children and young people. There is a commitment that such staff and volunteers have satisfactory Disclosure from the Disclosure and Barring Service (DBS), at an appropriate level, before working with children or vulnerable adults.

Steer Up takes the duty of pastoral care seriously and will be proactive in seeking to prevent young people, children or vulnerable adults from becoming the victims of abuse or neglect. We do this in a number of ways:

1. The creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds
2. Informing children, young people and vulnerable adults of their rights to be free from harm and encouraging them to talk to us if they have any concerns.
3. Ongoing support, at an appropriate level, to promote self-esteem and social inclusion, and to address the issue of protecting vulnerable adults in the wider context.



## **Scope of Policy**

This Policy applies to all mentors, staff and volunteers (including freelancers) employed or engaged by us. All have a legal responsibility to take seriously any child, young person or vulnerable adult concerns that come to their attention and follow the procedures given.

As an organisation, it is not our responsibility to investigate abuse. Nevertheless, we have a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.

## **Staff Responsibilities**

Staff working in direct contact with children, vulnerable adults or young people on a day-to-day basis may come across signs of harm and/or abuse. Staff must ensure that significant concerns for the wellbeing of a young person are reported to the appropriate nominated safeguarding officer. This will invoke the appropriate procedures to protect the child, young person or vulnerable adult, involving Social Services and/or the Police as appropriate. Where staff members are unsure and need guidance about safeguarding issues, they are encouraged to seek support from their nominated safeguarding officer.

In the event of any concern by any member of staff or mentor, or if approached by a child, young person or vulnerable adult, regarding any matter concerning abuse, they must tell the person that they are bound to pass on the information to the designated person. The person receiving the information should pass it on as a matter of urgency to ensure the matter can be dealt with as soon as possible. If the designated person is not available, the staff member should contact a member of the Senior Management Team. No person must be promised that anything they say will be kept confidential if the matter is related to their protection or abuse. It is helpful for a mentor or member of staff to tell the person they will jot down anything the person actually says to ensure an exact record as possible is kept for future reference.

Staff and mentors alike should make themselves familiar with the Safeguarding Procedures, contained in a separate document.



## **Controls**

Risk assessments must be carried out for all activities involving children, young people and vulnerable adults, and reasonable, proportionate adaptations made to those activities as a result in order to safeguard the wellbeing of such individuals. It is at the discretion of Steer Up to ask a young person or vulnerable adult to bring a Support Worker / Personal Assistant so that they can be fully assisted / safeguarded.

We reserve the right to refuse to provide our services to a child, young person or vulnerable adult, if we judge that the adaptations necessary to safeguard that individual's wellbeing go beyond what is reasonable and proportionate, including measures to manage inappropriate or disruptive behaviour.

We will endeavour to meet the person's access requirements and work towards an inclusive environment, as per our Vision and Values.

Safeguarding the wellbeing of any child, young person or vulnerable adult without their parent/guardian is the responsibility of the organiser of the activities in which the person is participating.

## **Regulated and Controlled Work:**

The Safeguarding Vulnerable Adults Act 2006 requires work that involves contact with children, young people or vulnerable adults is designated as either "regulated" or "controlled". The designation of regulated and controlled posts will be reviewed annually and updated where necessary.

## **Disclosure and Barring Service (DBS) Checks:**

DBS checks will be obtained when required by the designation of work as "regulated" or "controlled" or by the DBS. These requirements will be reviewed annually and updated where necessary.

Disclosure checks will be obtained for new starters prior to the commencement of any work where the Disclosure check is required

We will adhere to all relevant regulations and codes of practice as issued by the DBS.

Steer Up will confirm to the relevant staff member whether a satisfactory disclosure has been obtained. This information will be recorded securely on the central personnel database and any certificate then destroyed. If items appear on the disclosure that give cause for concern, relevant staff will discuss these with the relevant line manager/ CEO. They will then discuss with the applicant whether the service provision can continue or whether any conditions are to be applied.



### **Employing Persons with Criminal Records:**

The possession of a criminal record is not a bar to employment at Steer Up. If an offer of employment or contract has been made that is dependent on the obtaining of a disclosure by the successful applicant the offer will only be withdrawn if the disclosed information is relevant to the duties of the post or the selection criteria for that post. If appropriate consideration will be given modifying the offer of employment rather than withdrawing it

Where a post is exempt from the Rehabilitation of Offenders Act, 1974 (where it involves working with children, the elderly or the sick) this will be identified in the job description

If employment is not dependent on a Disclosure and the applicant declares convictions the offer will only be withdrawn if the conviction(s) is relevant to the duties of the post or the selection criteria for that post

### **Record Keeping**

The lead designated officer for the protection of vulnerable adults will retain the central record of all allegations and actions taken. This will include:

- Any notes, memoranda or correspondence dealing with the matter
- Any other relevant material

Copies of reports, notes etc will be kept securely password protected at all times, but will be shared in accordance with the Data Protection Act 1998.

### **Training**

All staff within Steer up will undergo training so that they are fully aware of this policy and their responsibilities. Designated Protection of Vulnerable Adults Officers will receive additional training so that they can effectively fulfil their responsibilities to the protection of vulnerable adults



## DIGITAL SAFEGUARDING

Steer Up is committed to the safeguarding and welfare of all mentors, mentees, staff, volunteers and members both online and offline. It is important that we demonstrate how we apply the same rigorous level of safeguarding protection online as we do in person, and this policy has been updated to reflect how we practice digital safeguarding and specifically minimising online risk.

This policy outlines the expectations for all mentors, staff, volunteers, members, associated contractors, third party providers and users to ensure the protection of children, young people, vulnerable adults, volunteers and staff online. As members of Steer Up, it's our responsibility to report online incidents that take place inappropriately and raise concerns, using the procedures outlined.

This specifically covers all Steer Up's online and digital activities, plus all digital activities undertaken on behalf of Steer Up at a national, international, and regional level and third-party social media and devices. This includes but is not limited to social media channels (i.e Instagram, Facebook, Twitter, YouTube, WhatsApp, TikTok, LinkedIn), emails, website, blogging platforms, other digital platforms (i.e Zoom, Microsoft Teams, Google Meet, Hangouts), all IT devices (i.e phones, computers) and internet connectivity provided by Steer Up.

In this policy we outline our approach to protecting mentors, mentees, staff, volunteers and members. We are constrained by the terms of service of third-party providers in our approach. We promote safe use of such services, however we recognise that certain issues can only be handled by the service providers directly.

What do we mean by digital safeguarding?

Digital safeguarding means: 'the protection from harm in the online environment through the implementation of effective technical solutions, advice and support and procedures for managing incidents'. Steer Up is committed to the safeguarding and protection of all mentors, mentees, staff, volunteers, members and users of our digital services and social media channels, and we apply the same safeguarding principles to our activities whether they are offline or online. This means protecting our members, volunteers, trustees and staff from online harm such as but not limited to:

- Online bullying and harassment
- Sexual exploitation and grooming online
- Discrimination and abuse on the grounds of any protected characteristic
- Sharing of illegal and inappropriate imagery
- Cyberstalking
- Impersonation and hacking
- Disinformation and misinformation
- The oversharing of personal information



## Digital safeguarding principles

In order to uphold these principles, our mentors, mentees, staff, volunteers and members are required to:

- Ensure all social media accounts are set up appropriately
- Clearly indicate on personal social media accounts using disclaimers that their thoughts and opinions are personal and are not reflective of Steer Up's policies, procedure or guidance
- Ensure that necessary technical solutions are in place to reduce access to inappropriate content on devices owned or used by Steer Up (i.e parental controls, filtering or monitoring software)
- Ensure that the necessary permissions are in place before taking and using photographs on mobile devices
- Remove photos from devices after meetings or events
- Attain parental permission before communicating with young people under the age of 16, regardless of whether they've contacted us first or not
- Continue to reinforce to young people and vulnerable adults the importance of using social media responsibly and safely using any necessary privacy settings
- Recognise that digital safeguarding is an important aspect of our work, committing to always deliver and share best practices

We will:

- Ensure our activities, projects and programs support all of our, mentors, mentees, staff, volunteers and members to remain safe online
- Use best practice digital safeguarding for technical solutions, processes and procedures
- Help our mentors, mentees, staff and volunteers support members in being effective online
- Follow the required best practice action when a digital safeguarding incident occurs
- Support and train appropriate mentors, staff, volunteers and members in digital safeguarding
- Include links with key organisations to raise awareness, refer and report incidents
- Carry out a risk-assessment for all activities, projects, programmes and services to ensure necessary digital safeguarding procedures are in place

If an issue is raised during an online mentoring session, it must be dealt with in the same manner as other safeguarding incidents. If you are unsure of the required steps to take, you should contact the Safeguarding representative for support.

# Appendix 1

## SAFEGUARDING PROCEDURE

This procedure must be followed whenever any mentor or member of staff hears an allegation from a young person, vulnerable adult or child that abuse has, or may have, occurred or where there is a significant concern that a vulnerable adult or child may be abused:

### Receive:

- Acknowledge and note what is said
- Accept what you are told - you do not need to decide whether or not it is true
- Listen without displaying shock or disbelief

### Reassure:

- Acknowledge their courage in telling you
- Do not promise confidentiality
- Remind them they are not to blame - avoid criticising the alleged perpetrator
- Do not promise that "everything will be alright now" (it might not be)

### React

- Do not delay in registering your suspicions or concerns
- Respond to the individual but do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- Explain what you will do next (i.e. inform a Designated Safeguarding Officer)

### Record

- Make notes as soon as possible - during the conversation if you can
- Use our [Safeguarding Report form](#)
- Include the time, date, location, the individual's own words (do not assume - ask questions, e.g. "Please tell me what that means?")
- Describe and note observable behaviour and appearance
- Cross out any mistakes
- Do not destroy your original notes - they may be needed later on and must be given to the Designated Person.

### Support

- Consider what support is needed for the individual - you may need to give them a lot of your time or they may need to be referred
- Ensure you are supported - such interviews can be extremely stressful and time consuming
- Once reported, the Designated Safeguarding Officer will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask.

# Appendix 2

## DEALING WITH INSTANCES OF ABUSE

### Detailed Guidance & Procedure for dealing with instances of abuse

Steer Up recognises its legal duty to work with other agencies in safeguarding young people, vulnerable adults and in responding to abuse. All mentors and members of staff have a responsibility to be mindful of issues related to child, young person and vulnerable adult's safety and welfare, and a duty to report and refer any concerns however "minor" they appear to be.

Please note that it is not the job of our mentors or staff members to investigate these concerns.

In cases where it is deemed that the individual in question lacks sufficient understanding to make informed decisions about their own care and treatment, parents/carers have a right to be informed about any concerns about the vulnerable person's welfare or any action taken to safeguard and promote their welfare, providing this does not compromise their safety. Where there are possible concerns about a vulnerable person's safety, unconditional confidentiality cannot be guaranteed and should not be offered.

Steer Up will be proactive by taking positive steps to inform students and participants of their rights to safety and protection and the options available to express their fears or concerns:

- Information regarding safeguarding and a summary of our policy will be included in the mentee guidebook
- The safeguarding policy will be made available on our website
- Staff most likely to encounter vulnerable persons will be provided with appropriate training

When participants make allegations about abuse or neglect, they should always be listened to, have their comments taken seriously and, where appropriate, the allegations should be investigated thoroughly.

If you suspect that an individual is going to discuss abuse, either towards themselves or another, establish ground rules regarding confidentiality. They must be informed that the information will be shared with a nominated person for safeguarding vulnerable persons and possibly with a counsellor.



The designated person will then contact the Local Authority Adult Protection Unit or Local Authority Child Protection Unit in order to discuss appropriate action. The Local Authority Adult Protection Unit or Local Authority Child Protection Unit is responsible for coordinating action in vulnerable person cases, including liaison with police.

Note: In the case of a vulnerable adult it is important to convey that the Adult Protection Unit will need to assess the situation and would want to work with the vulnerable adult in determining what could/should happen next. They would wish to respect the vulnerable adult's wishes and feelings provided no one is at immediate risk of harm.

If the vulnerable adult is fully aware of what could happen, they can:

- Decide whether they want to speak now or have time to think about it
- Be as informed as possible regarding the implications of passing on this information

If the complainant is the vulnerable adult or child themselves, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must be avoided as the use of leading questions can cause problems for the subsequent investigation and any court proceedings.

Procedure for staff dealing with suspicions or allegations of abuse to a child

Our primary concern is to protect the child – there is no choice other than to take action when you have reasonable cause to suspect child abuse.

### **Actions to take upon suspicion or disclosure:**

It is the duty of anyone who works with children to report disclosure of abuse. It is not for staff to decide whether or not a suspicion or allegation is true. All suspicions or allegations must be taken seriously and dealt with according to this procedure. Staff made aware of suspicions, allegations or actual abuse, are responsible to take the appropriate action according to the procedures set out below.

The incident should be reported immediately to the lead member of staff who is then responsible for dealing with allegations or suspicions of abuse. Staff should never try to deal with a suspicion, allegation or actual incident of abuse by him/herself.

It may sometimes be difficult to accept that something that has been disclosed in confidence by a child or anyone else should be passed on to a colleague. But the welfare of a child must be paramount and you therefore have a duty to report suspicions, allegations or actual incidents to the designated member of staff.



Information should also be reported if you yourself have concerns that a child may be suffering harm or at risk of abuse, even if you are unsure about your suspicions.

Once this initial report has been made, the designated member of staff will consult with the Head of Safeguarding and relevant statutory agencies.

What is Abuse?

Appendix 3 sets of definitions of abuse but it can be physical, neglectful, sexual, financial, psychological, emotional, institutional or discriminatory in nature.

Abuse is behaviour towards a person that either deliberately or unknowingly causes a vulnerable adult harm, or endangers their life or their human or civil rights. It can be passive, (e.g. failing to take action to care for someone, or failing to raise the alert about abuse); or active, (e.g. hitting, stealing or doing something that causes harm). Abuse can be a one-off or something that is repeated.

### **Procedure for staff dealing with suspicions or allegations of abuse to a vulnerable adult**

Any suspicion, allegation or incident of abuse must be reported to the designated member of staff with responsibility for the protection of vulnerable adults as soon as possible and in any event within 2 hours. (The Local Authority Adult Protection Unit is responsible for coordinating action in vulnerable adult cases, including liaison with police).

If it is agreed to be a Vulnerable Adult matter, a written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported. The telephone report must be confirmed in writing to the local authority Adult Protection Unit within 24 hours. If the consent has not been gained from the vulnerable adult, the nominated member of staff should discuss with the Local Authority Adult Protection Unit what action will be taken to inform the parents / carers of the vulnerable adult and a note of that conversation should be made. The nominated member of staff must notify the Principal of the College as soon as practicable and in any event within 2 hours of the initial concern arising.

### **Responding to an Allegation**

A full record shall be made as soon as possible on our Safeguarding Report Form of the nature of the allegation and any other relevant information including:

- Date and time
- Place where the disclosure of information took place
- Place where the alleged abuse happened
- Your name and any others present
- Name of the person complaining and (if different) the name of the vulnerable adult who has allegedly been abused
- The nature of the alleged abuse
- A description of any injuries observed
- An account of the allegation



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### **Responding to an allegation about a mentor or member of staff**

Any suspicions or allegations of actual abuse of a child or vulnerable adult by a mentor or member of staff must be reported to the nominated Safeguarding Manager, immediately. On being notified of any such matter, the designated member of staff will take steps as he/she considers necessary to ensure the safety of the person in question and any other person who might be at risk.



# Appendix 3

## DEFINITIONS OF ABUSE

### **Physical Abuse**

Physical abuse is the physical ill treatment of an adult, which may or may not cause physical injury and causes harm to the individual's person. It may involve pushing, slapping, pinching, punching, hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating, force feeding, improper administration of medicines or denial of prescribed medicines, forced isolation and confinement, including a person being locked in a room or inappropriate sanctions or restraint, or inappropriate manual handling. It may be the result of a deliberate failure to prevent injury occurring.

### **Psychological and Emotional Abuse**

Psychological abuse may involve the use of harassment, bullying, intimidation, indifference, hostility, rejection, threats, humiliation, name-calling, other degrading behaviours, shouting, swearing, discrimination or the use of oppressive language, mobile phone texting abuse, email, emotional abuse and all forms of cyber abuse. It can result in feelings of low self-worth. Some level of psychological or emotional abuse is present in all forms of abuse.

### **Sexual Abuse**

Sexual abuse involves a vulnerable adult participating in, or watching, sexual activity to which they have not consented or were pressured into consenting, or to which they cannot give informed consent. It is not necessary for the individual to be aware that the activity is sexual. The activities may include: physical contact, including penetrative or non-penetrative acts, e.g. rape, buggery, indecent assault or inappropriate touch, incest, and situations where the perpetrator touches the abused person's body (e.g. breasts, buttocks, genital area); Non-contact activities, e.g. exposing genitals to the abused person, or coercing the abused person into participating in or watching pornographic videos or photographs.

### **Neglect**

Neglect is the deliberate withholding or unintentional failure to provide help or support, which is necessary for the adult to carry out activities of daily living. It also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk. Neglect may involve: failing to provide adequate food, shelter and clothing; failure to ensure access to appropriate medical care or treatment; neglect of basic emotional needs



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### **Financial/Material Abuse**

Financial/Material Abuse is the exploitation, inappropriate use or misappropriation of a person's financial resources or property. It occurs when the individual is deprived of their own financial assets, for example, by holding money back from the individual, obtaining money by deception, or stealing money. It includes the withholding of money or the improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs.

### **Institutional Abuse**

Institutional abuse can be defined as abuse or mistreatment by a regime as well as by individuals within any building where care is provided. Examples include lack of flexibility and choice, lack of consultation, public discussion of personal matters, inadequate or delayed responses, staff overly controlling service users' relationships and activities.

### **Discriminatory Abuse**

Repeated, ongoing or widespread discrimination on the grounds of age, race, disability, religion, sexual preference or gender, slurs, harassment, name-calling, breaches in civil liberties, unequal access to health or social care.

### **Significant Harm**

Sometimes, a single traumatic event may constitute significant harm, e.g. violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the adult's physical and psychological development.



## CONTACT INFORMATION

### **Senior lead for safeguarding and child protection:**

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### **National Contacts: (Freephone Numbers)**

- The NSPCC +44 (0)808 800 5000
- Childline UK +44 (0)800 1111
- NSPCC Cymru/Wales +44 (0)808 100 2524

### **Useful websites**

- [www.there4me.com](http://www.there4me.com)
- [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- [www.chatdanger.com](http://www.chatdanger.com)
- [www.bullying.co.uk](http://www.bullying.co.uk)

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