

Social Investment Business

Sib091 Safeguarding Policy for funded organisations and partners

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Updated by: Laura Furness

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Approver: Directors' Group



FOREWORD

To comply with the requirements of ISO 9001:2015, the following list of documented information necessary to maintain the effectiveness of Social Investment Business's Quality Management System, is to be approved by the Directors Group:

- Quality Manual
- Quality Policy
- Procedures previously classified as mandatory ISO procedures
- All policies and operational procedures

This document is intended to be used by staff within Social Investment Business who are associated with this process/policy.

This **policy/procedure** has been approved by Directors Group and authorised on their behalf by a Group Director.

Name	Signature	Title	Date
Nick Temple		CEO	06 December 2022

VERSION HISTORY

Version ref	Author	Date	Process ref changed
1.0	Chan Allen	27 Sept 2022	Creation of new policy/procedure
1.1	Laura Furness	06 December 2022	Clarity around adults at risk added, and tailored to funded/partner orgs.

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SIB SAFEGUARDING POLICY FOR FUNDED ORGANISATIONS AND PARTNERS**INTRODUCTION**

Safeguarding is the practice of ensuring that children, young people and adults at risk have their health, well-being and rights protected in society. Safeguarding takes *proactive* steps to prevent abuse against Children and Adults at risk, including the action the organisation takes to promote the welfare of people including Children and Adults at risk to protect them from harm. This includes the security of personal data and images.

SIB is committed to safeguarding the well-being of children, young people and adults at risk with whom we come into contact within our funded work. We recognise that children, young people and adults at risk have rights as individuals and should be valued, listened to and treated with respect. SIB takes a zero-tolerance approach to any harm of a child, young person or adult at risk by our staff, partners and funded organisations. All SIB funded organisations, individuals and projects that work with children and young people or adults at risk are required to have a safeguarding policy and active procedures in place. This policy applies to all Social Investment Business (SIB) funded organisations and partners. It sets out principles, fundamental information, requirements and commitments in relation to those we fund and work with. It also outlines safeguarding procedures to accompany it for organisations to follow for the protection of children and young people at risk.

A child is defined as up to the age of 18. This document is inclusive of all staff and the policy and procedures cover all activities. Every organisation and its individual staff members have a duty of care to ensure the protection of the young people they are working with, from unnecessary risk and/or harm. The protection of young people is based on the principles outlined within the Children's Act 2004 and the United Nations Declaration on the Rights of the Child and Working Together 2018 Guidance. The principles recognise that the welfare of the young person is paramount and all young people, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have the right to protection from all types of harm and abuse.

An **adult at risk** is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support.

It is essential that everyone is clear how to report a concern about the welfare of young person or adult at risk. This means following the guidelines set out in this policy

DEFINITIONS

Board Trustees and non-executive directors.

Child Sexual Exploitation (CSE) Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Designated Safeguarding Lead (DSL) a nominated officer who supports colleagues to record and collate information relating to concerns/disclosures raised under this policy and act as the link to SMT/Board as needed.

Disclosure Barring Service (DBS) a service in England, Wales, the Channel Islands and the Isle of Man provided to help employers make safer recruitment decisions for people working in regulated activities and prevent unsuitable people from working with Children and Adults at Risk. There are equivalent services in the devolved administrations within the UK including but not limited to Disclosure Scotland, Access NI and the Protecting Vulnerable Groups (PVG) Scheme (Scotland) or equivalent police checks overseas. These services process requests for criminal records checks and decide whether it is appropriate for a person to be placed on or removed from a list of people who are barred from working with Children and Adults at Risk

Emotional Abuse – The persistent emotional maltreatment of a child or adult at risk such as to cause severe and persistent adverse effects. It may involve conveying to a child or adult at risk that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Female Genital Mutilation (FGM) Female genital mutilation is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. It's also known as female circumcision or cutting, and by other terms, such as Sunna, gudniin, halalays, tahur, megrez and khitan, among others.

Independent Local Authority Designated Officer (LADO) The Local Authority Designated Officer works within Children's Services and gives advice and guidance to employers, organisations and other individuals who have concerns about the behaviour of an adult who works with children and young people.

Local Safeguarding Children's Partnership (LSCP) Local Safeguarding Children's Partnerships are local safeguarding meetings where partners come together across children, adult and community safety services to identify the safeguarding need of areas and look to address this need through partnership working.

Neglect – The persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers).
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical Abuse – A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or adult at risk.

Product/Service – Fund and programme management services providing investment products (these include various types of loans and grants) provision of business support; and of research and evaluation services and products.

Sexual Abuse – Involves forcing or enticing a child, young person or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or adult at risk in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or adult at risk to behave in sexually inappropriate ways, or grooming a child or adult at risk in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children on children.

Social Investment Business (SIB) Group – Social Investment Business Foundation Social Investment Business Ltd, Futurebuilders (FBE) Ltd, SIB Fund Management (SIBFM) Ltd, and, SIB Loans (SIBL) Ltd

PRINCIPLES

- This policy is based on the legal and statutory definitions of a child (defined as being up to 18 years old) and adults at risk.
- A funded organisation will safeguard the welfare of children, young people and adults at risk, within the work they do by protecting them from neglect, physical, sexual or emotional abuse.
- All young people and adults at risk, regardless of age, culture, any disability they may have, sex, language, racial origin, religious belief, gender reassignment or sexual identity have the right to protection from any kind of abuse.
- All young people and adults at risk have the right to participate in an enjoyable and safe environment.
- Young people and adults at risk have the right to expect appropriate support in accordance with their personal and social development.
- Working in partnership with young people and adults at risk, their parent(s)/ carers and other agencies is essential for the protection of young people.
- Safeguarding children, young people and adults at risk is the responsibility of everyone within the organisation, regardless of their role.
- A timely and appropriate response will be given to all suspicions or allegations of abuse, or poor practice.
- It is the responsibility of the Designated Safeguarding Lead/Leadership Team within both internal and external agencies involved with young people and / or adult at risk to uphold safeguarding criteria thresholds.
- The sharing of confidential information is restricted to the necessary external agencies.
- All personal information about children & young people and adult at risk is shared and stored appropriately in accordance with the Data Protection Act, the Freedom of Information Act and Information Sharing Protocols.

SIB and its funded organisations should recognise their statutory responsibility to ensure the welfare of young people and adults at risk and work with the Local Safeguarding Children's Partnership (LSCP) to comply with safeguarding procedures.

REQUIREMENTS

SIB expects those that it funds who work with children, young people or adults at risk to have the following in place:

- A good understanding of the issues around safeguarding and their obligations in law;
- A tailored safeguarding policy and procedure that is both proportionate and up to date with the legislative and policy requirements of the relevant nation. This policy must be reviewed regularly, and staff/ trustees trained on its contents;
- Policies and procedures which are clear, available publicly, are accessible and promote a transparent approach to provide any children, young people and adult at risk supported the

confidence and reassurance that safeguarding reporting concerns and disclosures will be dealt with appropriately, respectfully and promote learning;

- An ability to demonstrate good quality leadership and management, including clarity around leadership on safeguarding issues, inclusive of having one or more nominated member/s of staff (a Designated Safeguarding Lead) who has the knowledge and skills to promote safe environments for children, young people and adults at risk and is able to respond to reporting concerns and disclosures;
- Enough staff to provide a safe service for children, young people and adult at risk;
- The necessary diligence checks in place for staff (e.g. Disclosure and Barring Services/ DBS in England or equivalent services in the devolved administrations within the UK including but not limited to Disclosure Scotland, Access NI and the Protecting Vulnerable Groups (PVG) Scheme (Scotland) or equivalent police checks overseas);
- A process for working in partnership with their local safeguarding services.

SIB's funding agreements have terms and conditions about safeguarding ensuring that these requirements are clear. SIB cannot offer advice on developing safeguarding protection policies and procedures as this is a specialist area of expertise, and each organisation's safeguarding and protection policies must be tailored to fit the activities of that organisation. Resources are readily available, and we recommend that those seeking safeguarding advice should consult the following providers who can offer a range of information, advice, training and resources for organisations and individuals who work with children, young people and adult at risk either face-to-face, or remotely:

- The Department of Education;
- The National Society for the Prevention of Cruelty to Children (NSPCC);
- NHS England;
- The Charity Commission for England and Wales.
- The Social Care Institute for Excellence

If SIB receives a reporting concern or identifies a safeguarding issue, or if we receive an allegation in good faith or identify an issue of concern ourselves and believe that children, young people or adult at risk may be at risk through a funded organisation, individual or project we will contact the appropriate authorities.

IMPLEMENTATION

The funded organisation's Safeguarding and Child Protection Policy shall be adopted by the following:

- The organisation and its staff, associates, volunteers, young people and trustees
- All other bodies working in partnership with them.

MONITORING PROCEDURES

The funded organisation's Safeguarding and Child Protection Policy should be monitored annually, and a full policy review to occur bi-annually. The following situations may also trigger a review of the policy:

- Any changes of legislation
- Any changes in youth governance
- The result of a significant case

SAFE RECRUITMENT

Support and community services would not exist without the thousands of staff and volunteers who deliver provision. There are many different roles to play in delivering quality services for young people and adults at risk and ensuring we encourage individuals that are suitable to work with these groups is essential. Getting the right people in place is key to well organised and quality services delivered in a safe and supportive environment.

Safe recruitment by any organisation in receipt of funding or support from SIB will mean taking steps to ensure only individuals who are suitable for working with young people and / or adults at risk, whilst keeping them safe from harm and risks, are appointed. Safe recruitment procedures should be adopted and applied consistently when appointing a staff member, associate or volunteer.

Under the Protection of Children Act 1999, all individuals working on behalf of, or otherwise representing, an organisation are treated as employees whether working in a paid or voluntary capacity. When recruiting the following steps will be taken to support safe recruitment:

- Draw up a role profile which highlights the key responsibilities
- Draw up a person specification to define the skills and experience required for the role
- Be clear about the aims and philosophy of your organisation in your advert/ information
- Emphasise your organisations stance on safeguarding children and young people and equal opportunities
- Use application forms to collect information on each applicant
- Ensure that more than one person from your organisation looks at each application form
- Ask for original identification documents to confirm the identity of the applicant, e.g. passport or driving licence.

PROMOTING GOOD PRACTICE WHEN DELIVERING ACTIVITIES

Raising awareness of what safeguarding means for everyone will create a safer environment for young people and adults at risk. Encouraging volunteers, staff, parents/carers and trustees to get to be familiar with safeguarding policies and procedures will increase the likelihood of good safeguarding practice.

GOOD PRACTICE GUIDELINES

All staff, associates and volunteers should demonstrate exemplary behaviour in order to protect young people and adult at risk and themselves. This includes:

- Adopting the organisation's safeguarding policy and procedures
- Promoting the organisation's safeguarding policy to those they manage, their teams and any associates or volunteers they may work with
- Wherever appropriate, conducting one to ones with young people and adults at risk in an open environment, where others are present
- Treating all young people and adults at risk equally, and with respect and dignity
- Always putting the welfare of young people and adults at risk before organisational aims
- Building and maintaining a safe and appropriate relationship with young people and adults at risk
- Empowering young people and adults at risk to share in decision-making processes
- Attending training as required
- Positive role modelling for young people and adults at risk
- Developing and adopting a Code of Conduct

RELATIONSHIPS OF TRUST

The power and influence a member of staff or someone in a leadership role has over someone attending a group activity cannot be underestimated. Therefore, staff are expected to act within appropriate boundaries with young people and adults at risk, in relation to all forms of communication. Staff should be mindful of any physical contact and should not have intimate or sexual relationships with young people or adults at risk.

"It is an offence for a person aged 18 or over to involve a child under that age in sexual activity where he or she is in a specified position of trust in relation to that child. This includes those who care for, advise, supervise or train children and young people." (Sexual Offences Act 2003)

Develop a Code of Conduct that clearly defines appropriate behaviours for all staff and volunteers.

SUPERVISION RATIOS

In particular youth work organisations funded or receiving support from SIB must ensure that an assessment is made, specific to the programme to ascertain staffing requirements, which will enable effective supervision of young people and effectively manage the associated risks. The national guidance states that the level of supervision should take account of:

- The age and ability of the young people or adult at risk
- The activity being undertaken

- Their growing independence
- Their need for privacy
- The geography of the facility being used
- The Risk Assessment

GUIDELINES ON PARTICIPATION CONSENT

Consent to participate in an activity led by the organisation should be obtained and processed before the event. Any young person under the age of 18 should have consent from a parent or guardian. If this is not possible, seek advice from the DSL or Deputy DSL. Any exceptions should be recorded in the Risk Assessment. Information provided on for the consent of the activity will not be kept longer than necessary.

GUIDELINES ON MEDIA CONSENT

If any material is going to be shared beyond the organisation, then Media Consent needs to be obtained. Any young person under the age of 18 should have consent from a parent or guardian. Material will be kept no longer than two years and consent can be withdrawn at any time.

GUIDELINES ON YOUNG PEOPLE AND USE OF THE INTERNET AND E-SAFETY

The Internet is significant in the distribution of indecent photographs/pseudo photographs of children and young people. Adults often use the Internet to establish contact with young people to “groom” them for inappropriate or abusive relationships.

When a worker or volunteer is discovered to have placed child pornography on the internet, or accessed child pornography, the police will normally consider whether that individual might also be involved in the active abuse of young people. In particular, the individual’s access to young people should be considered.

Any project that provides service users with direct access to the Internet must have protocols in place to ensure safe use. Many websites contain offensive, obscene or indecent material such as:

- Sexually explicit images and related material
- Advocating of illegal activities

Staff authorised to use the internet must not download pornographic or any other unsuitable material on to this organisation’s technical equipment or distribute such material to others. In addition, users must not upload any material to the internet that could be considered inappropriate, offensive or disrespectful of others.

Disciplinary action will be taken against staff in breach of this policy. Where this is done unintentionally, the user must exit the website and/or delete all material immediately. Breach of this will be treated as

gross misconduct. Where exemption is required, because of the nature of the work of the member of staff, written permission must be given in advance with the manager.

If your project allows young people access to the internet, ensure that you have a protocol in place that ensures safe use.

RECOGNISING ABUSE

It is part of everyone's role at an organization funded by or receiving support from SIB to do everything possible to keep young people safe from abuse. There is a moral responsibility to report any concerns about a child, young person or adult at risk in any context. Most suspicions of abuse come about from observation of changes in behaviour, appearance, attitude or relationship with others. Training is important to support staff and volunteers to recognise abuse.

DEFINITIONS OF ABUSE

Working together to safeguard children 2018 defines abuse as: *"A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm"*.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children and adults at risk may be abused by an adult or adults, or another child or children.

There are four major types of abuse:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

There are other types of abuse that fit into these categories and are key areas for children and young people in the UK. These include but are not restricted to Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), Extremism, contextual safeguarding, mental health, domestic abuse and homelessness (Working Together guidance 2020).

Key areas will need to be covered in annual training, and it is important for staff to be aware of particular safeguarding areas that may affect specific programmes. The DSL will review new programmes and activities to ensure any key areas are flagged in the risk register and will identify any additional training needs if necessary.

SIGNS OF ABUSE

Signs which may indicate abuse include:

- Unexplained bruising and injuries
- Sexually explicit language and actions
- Sudden changes in behaviour, such as absences, withdrawal or having unexplained material goods
- Something a child has said
- A change observed over a long period of time e.g. losing weight or becoming increasingly dirty/unkempt

Such signs do not necessarily mean a child, young person or adult at risk is being abused. Equally, there may not be any signs; you may just feel something is wrong. It is not a member of staffs' responsibility to decide if it is abuse, but it is their responsibility to act on such concerns and report them accordingly.

The signs of abuse are not always obvious, and a young person or adult at risk may not tell anyone what is happening to them. Individuals are often scared that the abuser will find out, and worried that the abuse will get worse. Quite often they think that there is no-one they can tell or that they will not be believed.

Occasionally, individuals do not even realise that what is happening to them is abuse. It is key for the organisation's associates and volunteers to be able to recognise signs of abuse. This will be covered within annual training.

VULNERABLE PEOPLE

The organisation has a responsibility to be aware that some people who take part in our activities may experience difficulties that adversely affect their lives at home and/or within their lives outside of the organisation and therefore be at risk of harm.

PARTICULARLY VULNERABLE GROUPS

Particularly vulnerable groups could include:

- People with a disability (disability can take many forms including)
 - Physical disability
 - Sensory disability
 - Learning disability

Research indicates children and young people with a disability are more likely to be abused than non-disabled children. They may find it more difficult to recognise abuse. Disclosing abuse is difficult for any child; for a child with disabilities, it may be especially difficult, for the following reasons:

- their life experience may be limited, therefore they may struggle to recognise inappropriate behaviour
- communication difficulties can make it hard to report abuse
- they may not be able physically to leave an abusive situation
- they receive intimate physical care and, therefore, the abuse may seem 'normal'
- their self-esteem and self-image are poor
- they may not be aware of how or to whom they can report abuse

Children and young people at risk of sexual exploitation (CSE)

Young people at risk of, or engaged in, sexual exploitation may not see themselves as victims. Workers need to be aware of young people who may be at risk.

Often the exploitative situation includes contexts and relationships where young people receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of their performing, and/or others performing on them, sexual activities. It can occur through the use of technology without the child's immediate recognition e.g. being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised by the child's limited availability of choice, resulting from their social/economic and/or emotional vulnerability.

There are strong links between children who go missing and the internal trafficking, between towns, of young people for the purposes of sexual exploitation. Children and young people from loving and supportive families can be at risk of exploitation and workers must be careful not to stereotype specific groups of children as potential victims.

Young Carers

A young carer is a child or young person whose life is restricted by the need to take responsibility for another person. The person might be a parent, a brother or sister, grandparent or other relative who is disabled, has some chronic illness, mental health problem or other condition connected with a need for care, support or supervision.

Young carers can become isolated, with no relief from the pressures at home, and no chance to enjoy a normal childhood. They are often afraid to ask for help as they fear letting the family down or being taken into care.

The organisation should be aware of the needs of a young carer and be able to offer support and/or signpost him/her to a charity specifically for young carers. If their needs are more serious or urgent these concerns must be shared with the Designated Person for Safeguarding within the organisation.

Children and young people affected by gang activity

Young people who become involved in gangs are at risk of violent crime and are, therefore, deemed vulnerable and in need of safeguarding.

The nature and characteristics of gangs vary but generally:

- are predominantly young males
- begin offending early and have extensive criminal histories
- are often territorially based or linked to a particular religion or culture
- deal in drugs as a way to make money

Girls tend to be less willing than boys to identify themselves as gang members but are often drawn into male gangs as girlfriends of existing members. They (and sisters of gang members) are at particular risk of being sexually exploited or abused, but this risk can also affect male gang members.

Youth workers have a responsibility to safeguard and promote the welfare of these young people and to prevent further harm both to themselves and to other potential victims. As the young person may be both a victim and a perpetrator, it is vital that workers recognise their needs and provide support.

Children and young people missing education

The law requires all children and young people between the ages of 5 and 16 to be in full time education. Children and young people who are not attending school or not being home-educated may be particularly vulnerable.

The local authority's Children's Services will be keen to be informed if you know about children and young people who are not either in school or receiving education at home, or if you have any concerns about children or young people who have gone missing from your area or neighbourhood, so that they can make sure that they are safe and that they receive an appropriate education. Raise your concerns with the designated safeguarding contact within the organisation, who can then make a referral.

Young people and adults at risk who are homeless

Homeless young people and adults at risk are not just those who are sleeping on the streets. Young people may be 'sofa surfing', staying on the floors and sofas of friends or family, in temporary hostel or bed and breakfast accommodation or in unsuitable or unsafe accommodation.

There are many reasons why young people are homeless but, whatever the reason, insecure housing is likely to have a debilitating impact on their lives and increase their vulnerability.

Children and young people who are experiencing domestic abuse

In a house where domestic abuse occurs, the children and young people are being abused too. Children and young people may be aware of the abuse of a parent, through hearing or seeing incidents of physical violence or verbal abuse. They may also continue to witness and/or hear abuse during post-separation contact visits.

Research shows the risks of children and young people being directly physically or sexually abused are markedly increased, in homes where domestic violence occurs.

The impact on such children and young people may be demonstrated through aggression, anti-social behaviour, anxiety or depression.

Children and young people whose parents / carers misuse substances

Although there are some parents/carers who are able to care for and safeguard their children despite their dependence on drugs or alcohol, parental substance misuse can cause significant harm to children at all stages of their development.

Where a parent has enduring and/or severe substance misuse problems, the children in the household are likely to be at risk of, or experiencing, significant harm primarily through emotional abuse or neglect.

The child or young person's daily life may revolve around the parent's/carer's substance misuse and they may be assuming inappropriate responsibilities within the home.

Children and young people whose parents / carers have learning disabilities

Parental learning difficulties do not necessarily have an adverse impact on a child's developmental needs. But, where it is known parents/carers do have learning disabilities, workers should be particularly aware of the developmental, social and emotional needs of the children and young people in the family. Risk of harm or to wellbeing can be:

- a child having caring responsibilities inappropriate to their age, such as looking after siblings
- a child experiencing neglect
- a child with a mother with learning disabilities, who may be targeted by men to gain access to children, for the purpose of sexually abusing them

The organisation must also recognise that parents/carers with learning difficulties may need to have information about programmes and activities explained to them verbally and may need support when forms need to be completed.

Children and young people whose parents / carers have a mental illness

Parental mental illness does not necessarily have an adverse impact on a child or young person's care and developmental needs. However, as studies show the chance of child death through abuse or neglect where parental mental illness is present, is greatly increased.

In a household where a parent has enduring and/or severe mental ill-health, children are more likely to be at risk of, or experiencing, significant harm. Risk of harm or to wellbeing could be:

- Parental aggression or rejection
- having caring responsibilities inappropriate to his/her age
- witnessing disturbing behaviour arising from the mental illness (e.g. self harm, suicide, uninhibited behaviour, violence)
- being neglected physically and/or emotionally by an unwell parent

Unaccompanied asylum seeking and refugee children

Children who have come to the UK without parents or relatives, are some of the most vulnerable children in our society. They are alone in an unfamiliar country, at the end of what has most likely been a long, perilous and traumatic journey. They may have experienced exploitation or persecution in their home country, or on their journey to the UK. Some may have been trafficked, and many more are at risk of being trafficked or being exploited in other ways, some of which are covered here, such as becoming homeless, becoming involved in gang activity and being out of education. Such children and young people should be living in foster care or supported accommodation.

Asylum seeking children also have a greater risk of going missing or experiencing mental health issues. Reasons for this could be:

- difficulties in communication
- frustration at not understanding the asylum seeking process and not feeling believed/supported
- worries for family members that they may have lost touch with since leaving their country/during the journey to the UK
- exploitation by the traffickers, who they may now owe money to
- post-traumatic stress disorder
- isolation and loneliness

The local authority should be aware of an unaccompanied asylum seeking child's needs and is responsible for their safety and wellbeing. Any safeguarding concerns should be reported to them to ensure the young person's safety.

Any concerns relating to particularly vulnerable children, young people and adults at risk must be raised with any organisation in receipt of SIB funding or support's designated safety officer as soon as

possible. Do not make assumptions that another agency or local authority provision is already managing this because the young person is already known to them.

RESPONDING TO DISCLOSURE, SUSPICIONS AND ALLEGATIONS

Any organisation in receipt of SIB funding or support has the primary responsibility for safeguarding to ensure that concerns and any relevant information is passed onto relevant organisations such as the Independent Local Authority Designated Officer (LADO) and in emergencies, the police. These organisations have the statutory responsibility to make enquiries to establish whether a child or young person or adult at risk is at risk of harm.

RESPONDING TO DISCLOSURE

If a young person or adult at risk discloses, they, or another young person or adult at risk, is concerned about someone's behaviour towards them, the person receiving this information should:

- Remain calm and in control.
- Reassure the young person or adult at risk by telling them they have done the right thing.
- Take what the young person or adult at risk says seriously.
- Listen carefully to what is said.
- Keep questions to a minimum – only ask for clarification and no leading questions.
- Don't promise to keep it a secret. Let the young person or adult at risk know you will need to share the information with other professionals to keep them and/or other young people or adult at risk safe.
- Record what is said on your Incident Report.
- Tell the young person or adult at risk what will happen next.

In all cases consider the welfare of the young person or adult at risk who has disclosed as the highest priority. If there is a concern the young person or adult at risk is in immediate danger:

- Contact the police and explain the situation to them.
- Stay with the young person or adult at risk.
- If necessary, move to a safe place away from immediate harm and that no situation arises which could cause any further concern.
- Call for immediate medical attention if the young person or adult at risk requires it.
- Contact the organisation's DSL to let them know what is happening and ask for further advice and guidance.
- Make a factual record of events as soon as possible by using the Incident Form.

Do not investigate further, share confidential information with others, or take any further action unless authorised to do so. The police will now be in charge and anything you do without their authorisation may harm their investigation.

If a young person or adult at risk is not in immediate danger but a disclosure has been made:

- Follow the disclosure process as above. Send the incident form to the DSL at Your Organisation within 24 hours and notify your manager and/or DSL that you have done so
- The DSL will then contact you to talk through this if necessary.
- The DSL will inform you of next steps to be taken and you will receive support from your manager.

Emergency: If a young person or adult at risk is in immediate danger you should contact the police on 999.

Non-emergency: If there is no immediate danger or advice or information is needed the DSL can contact the relevant LADO or Children's Social Care Team.

Concerns should be reported to the relevant LADO for the local authority where the incident occurred. If the concern relates to a staff member, the LADO of their registered place of work should be contacted (the details can be found on the Children's Local Partnership Board website).

RESPONDING TO CONCERNS

If there are any concerns about a young person or adult at risk, an Incident Form should be completed and this should be emailed to the DSL of the organisation in receipt of SIB funding or support. This form will be used if an incident occurs that causes concern for the safety of a young person or adult at risk who is not in immediate danger. The DSL will then advise of next steps.

RECORDING A SAFEGUARDING CONCERN

If anyone has concern about a child or young person or adult at risk's welfare or safety, it is vital all relevant details are recorded. This must be done regardless of whether the concerns are shared with the police or other agencies. Keep an accurate record of:

- The date and time of the incident/disclosure.
- The date and time of the report.
- The name and role of the person to whom the concern was originally reported and their contact details.
- The name and role of the person making the report (if this is different to the above) and their contact details.
- The names of all parties who were involved in the incident, including any witnesses to an event.
- What was said or done and by whom.
- Any action taken to investigate the matter.
- Any further action taken (such as a referral being made).
- The reasons why the organisation decided not to refer those concerns to a statutory agency

- The report must be factual. Any interpretation or inference drawn from what was observed, said or alleged should be clearly recorded as such. The record should always be signed and dated by the person making the report.

IF AN ALLEGATION IS MADE AGAINST A STAFF MEMBER

Any concerns involving the inappropriate behaviour of a staff member at an organization in receipt of funding or support from SIB towards a young person or adult at risk must be taken seriously and investigated. The LADO will be informed where the incident occurred. The situation will be explained to the staff member (if deemed appropriate) who is at the centre of the allegation. They may be asked to cease working on a temporary basis until the matter is formally resolved, and after investigation this could lead to dismissal and further action being taken against the member of staff. This will be reviewed on a case-by-case basis. Support will be provided for the person who the allegation has been made against.

IF AN ALLEGATION IS MADE AGAINST A DESIGNATED SAFEGUARDING LEAD

Any concerns involving a DSL directly should be reported to a Senior Manager. It is important that all staff are aware of the organisation's staff reporting structure.

MALICIOUS ALLEGATIONS

An allegation may be classified as malicious. Care should be taken in dealing with such an outcome, as some facts may not be wholly untrue. Some parts of an allegation may have been fabricated or exaggerated but elements may be based on truth.

Where a preliminary enquiry / investigation was undertaken and the allegations were deemed to be malicious, a record should be made stating that:

- An allegation was made (but not what the allegation was)
- Date the allegation was made
- The allegation was full investigated
- The outcome was that it was found to be malicious or unsubstantiated and that no further action was taken.

Please refer to LADO guidelines for classifications of outcomes following investigations.

WHISTLEBLOWING

Whistleblowing is the process whereby an employee raises a concern about malpractice, wrongdoing, risk, or illegal proceedings, which harms or creates a risk of harm to the people who use the service, employees, or the wider community.

Whistleblowing is not the same as making a complaint or raising a grievance. Whistleblowing is different because it involves a situation where an employee raises a concern about some form of malpractice that they have witnessed in their workplace.

A whistleblowing concern is when a person witnesses an issue or risk that affects someone other than themselves. A young person or adult at risk may be directly affected by an act or decision within their organisation or that the organisation has a safeguarding issue which is not being addressed.

Whistleblowing Policies within organisations in receipt of SIB funding or support should include processes that:

- Encourage an open culture where people feel comfortable raising concerns with their managers.
- Give people the confidence that if they raise an issue that their name will not be revealed without their consent.
- Give people the option to raise concerns anonymously.
- Every organisation's whistleblowing Policy should be read in conjunction with Safeguarding and Child Protection Policy.

Workplace Environment

As part of investment (loans or grant/loan blended funding) assessments SIB will consider whether or not there is any current or historic evidence of workplace harassment, discrimination or violence. SIB will take very seriously any evidence of current workplace violence, harassment, or discrimination in making its investment and funding decisions. Where there is evidence of this having occurred historically, SIB will undertake additional due diligence in this area to ensure that any historic issues have been fully addressed.

DATA PROTECTION AND MANAGEMENT OF CONFIDENTIAL INFORMATION

SIB and organisations in receipt of funding and support must be committed to the safe and secure management of confidential information. All personnel information, including volunteer information, is stored securely and can only be accessed by those that require it to carry out their role. Only relevant information is stored and this is regularly reviewed and outdated information destroyed appropriately.

SIB and organisations in receipt of funding and support must also be committed to the rights of children and young people to confidentiality. However, where a worker feels that the information disclosed by a child or young person or adult at risk should be referred to their line manager for investigation by an appropriate agency, the young person or adult at risk should be told that confidentiality cannot be kept.