

Safeguarding Children, Young People and Adults Policy For all staff, volunteers & contractors

Context

- Legal status of the organisation: Charity and Company limited by guarantee
- Registered office & registration number: The Coram Campus, 41 Brunswick Square, London WC1N 1AZ. Company Registration Number – 712260, Charity Number – 313697
- Where the organisation works in the UK and overseas: All of our work is undertaken in England and Wales, including the Channel Islands.
- What we do: Young Enterprise is a national financial and enterprise education charity that motivates
 young people to succeed in the changing world of work by equipping them with the work skills,
 knowledge and confidence they need.
- Who we work with: Schools, Colleges & Higher Education Institutions as well as other education providers to deliver our programmes to young people
- Regulated by: The Charity Commission.
- Our charitable and community objectives are: Through hands-on employability, enterprise and financial education programmes, resources and teacher training, we aim to reduce youth unemployment, help young people realise their potential beyond education and empower a generation to learn, to work and to live.
- Numbers of staff: 96 (October 2024)
- Numbers of volunteers: In England, Wales 2236 (October 2024)
- **Numbers of clients or beneficiaries:** 634,180 learning opportunities for young people across England, Wales (Academic 2023-24))

If you have a safeguarding concern

Please follow the process below. An electronic version of this can be found <u>here</u> or using the QR code below:

Immediate Harm?

Is the individual in immediate harm?

If YES - call 999 and ask for the relevant authorities (police, ambulance or fire service) and remain with the individual before following next steps

If NO - move to next step

Record the Incident

As soon as possible record all key factual details (no opinions):

- time and date of the incident
- names of anyone involved
- type of incident

Remember not to promise that you'll keep anything secret

Inform the YE Desigated Safeguarding Lead

Designated Safeguarding Lead is Katherine Gale, Heda of Volunteering, katherine.gale@y-e.org.uk (07745 739241)

Deputy Designated Safeguarding Lead is Maggie Ayre, Interim Head of Educational Partnerships, maggie.ayre@y-e.org.uk (07918 561349)

Completion of an Incident Form

Support the DSL or DDSL to complete an Incident Form, providing as much detail as possible in relation to the incident



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Policy Statement

Young Enterprise (YE) recognises that the welfare of children, young people and adults at risk is paramount and that they all have equal rights of protection. YE has a duty of care and will do everything it can to provide a safe, caring and secure environment for them whilst they are engaged in YE activities.

Our Commitment

We will:

- ✓ treat everyone with respect and celebrate their achievements,
- ✓ carefully recruit and select all staff and volunteers,
- ✓ respond to concerns and allegations appropriately,
- ✓ To the best of our ability anticipate, and proactively manage safeguarding risks that may present themselves to the organisation

When there are concerns about the welfare of any child, young person, or adult at risk, all responsible adults in our organisation are expected to share those concerns, without delay, with the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead.

Our policy is approved by our Health, Safety & Risk Committee (HSRC) & the Risk & Audit Committee of our Board of Trustees and will be reviewed and updated annually. We will publish and promote this policy to all staff, volunteers & contractors, through induction, training and supervision as required. We endeavour to disseminate, as appropriate, this policy to all who come into contact with YE (e.g., children, young people, adults at risk, their parents, carers, families and others, such as organisational partners and funding organisations, etc.)

Policy Aim

As members of <u>SAFEcic</u>, we aim at all times to attain best safeguarding practice throughout all our activities with children, young people & adults at risk. We endeavour to provide a safe and friendly environment and celebrate all achievements. We will achieve this by adhering strictly to this policy, guidance and risk assessments.

Lead & Deputy for Safeguarding

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead for YE are as follows:

Designated Safeguarding Lead (DSL):

Katherine Gale
Head of Volunteering
07745 739241 (work)
07741 250122 (if outside work hours)
katherine.gale@y-e.org.uk

Deputy Designated Safeguarding Lead (DDSL):

Maggie Ayre Head of Educational Partnerships 07918 561349 (work) 07899 984597 (if outside office hours) maggie.ayre@y-e.org.uk

Their role is to oversee and ensure that our Safeguarding Policy, which includes eSafety, is fully implemented and that we attain SAFEcic standards.

Their responsibilities are:

- ✓ monitoring and recording concerns
- ✓ making referrals to social care, or police, as relevant, without delay
- ✓ liaison with other agencies
- ✓ arranging Safeguarding training for all staff who require it for their role

The Deputy for Safeguarding will be available to support or cover for the Lead. They will also handle any complaints or allegations against the Lead for Safeguarding if appropriate.

Line of accountability for Safeguarding

The responsibility for Safeguarding at Board or Committee level is shared between members. Safeguarding is on the Charity's Risk Register. A senior member of the Charity at Board level has been appointed to take strategic responsibility for the organisation's Safeguarding arrangements. This person is unconnected to the Designated Safeguarding Lead and the Deputy Designated Safeguarding, and will have up to date and relevant training with the ability to develop knowledge, skills and expertise in safeguarding.

Our Senior Lead Trustee for Safeguarding is

Name: Graham Farhall

Job role: Charity Trustee, Chair of the Risk & Audit Committee (RAC) Contact

details: CEO@y-e.org.uk

Media enquiries in relation to safeguarding

All media enquiries will be handled by: Elsa Garey, Head of Marketing & Communications elsa.garey@y-e.org.uk

Why do we need a Safeguarding Policy?

All organisations that work or come into contact with children, young people and/or adults at risk need to have safeguarding policies and procedures in place.

Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall into the remit of this policy.

To undertake these responsibilities, we:

- have senior managers and Trustees committed to safeguarding
- are clear about peoples' responsibilities and accountability
- · have a culture of listening to children, young people and adults at risk
- undertake safer recruitment practices for all staff and contractors working with children & young people and adults at risk
- take a risk management approach to the design of volunteer roles and volunteer engagement activity, including safeguarding training and enhanced DBS process for applicable roles
- have procedures for safeguarding children and young people and adults at risk
- · have procedures for dealing with allegations against, and concerns about, any staff
- make sure staff, volunteers and contractors, working with children & young people and adults at risk, have mandatory induction and relevant safeguarding training, supervision, reviews and support
- · have agreements about working with other organisations and agencies

Definition of a child/young person

There is no single law that defines the age of a child across the UK. The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child "means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier" (Article1, Convention on the Rights of the Child, 1989).

For the purposes of Safeguarding within Young Enterprise we will be using the above UN Convention on the Rights of the Child definition, therefore a child/ young person as outlined within this policy is anyone who has not yet reached their 18th birthday.

Definition of an adult at risk

There is no single law that defines an adult at risk across the UK. For the purposes of Safeguarding within Young Enterprise we will be using the above UN Convention on the Rights of the Child definition, therefore an adult at risk is a person over the age of 18 years and is:

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

Recognising Abuse in Children, Young People and Adults at Risk

Abuse can take many forms. An overview of different types of abuse for children, young people and adults at risk as can be seen below:

In children and young people:

- Bullying and cyberbullying
- Child sexual exploitation
- Child trafficking
- Criminal exploitation and gangs
- Domestic abuse
- Emotional abuse
- Female genital mutilation
- Grooming
- Neglect
- Non-recent abuse
- Online abuse
- Physical abuse
- Sexual abuse

Further details on each of these types of child and young people abuse can be found on the <u>NSPCC</u> website.

In adults at risk:

- Physical abuse
- Psychological abuse
- Financial or Material abuse
- Sexual abuse
- Neglect & Acts of Omission
- Organisational Abuse
- Self Neglect
- Domestic abuse
- Modern Slavery
- Discriminatory Abuse

Further details about each of these types of abuse of adults at risk can be found on <u>Social Care Institute</u> of <u>Excellence (SCIE)</u> website.

What else might be of concern?

A child, young person or adult at risk who:

- is becoming secretive about where they are going to or who they are meeting
- will not let you see what they are accessing online
- is using a webcam in a closed area, away from other people
- is accessing the web or using a mobile for long periods and at all hours
- · clears the computer history every time they use it
- · receives unexpected money or gifts from people they don't know
- · does not appear to have the money they should have

A person who:

- befriends a child, young person or adult at risk on the internet or by text messaging
- has links to children, young people and/or adults at risk on their social media pages especially if they work in a position of care such as a sports coach or care worker
- is secretive about what they are doing and who they are meeting

eSafety

Why do we need to include eSafety?

Modern digital technology has made access to information and communication increasingly easy for everyone. This is especially so for those who cannot always go out to socialise and rely on websites for social networking, watching films, downloading music, shopping etc. Government guidance is clear, that all organisations working with children, young people and adults at risk, families, parents and carers have responsibilities. It is also important to remember, children, young people and adults at risk can also abuse and such incidents fall into the remit of this policy

What are the Risks?

There are many potential risks including:

- receiving or sending unwanted or upsetting texts, e-mail messages or images.
- being "groomed" by another with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs or crime.
- sharing indecent images without consent
- viewing or sending unacceptable material such as inciting hatred or violence.
- sending bullying messages or posting malicious details about others.
- · overspending on shopping and gambling sites.
- inappropriate relationships or prostitution.

Handling Disclosures

Disclosure is the process by which children, young people and adults at risk start to share their experiences of abuse with others.

When a disclosure is made by a child, young person or adult at risk it is important to remember to:

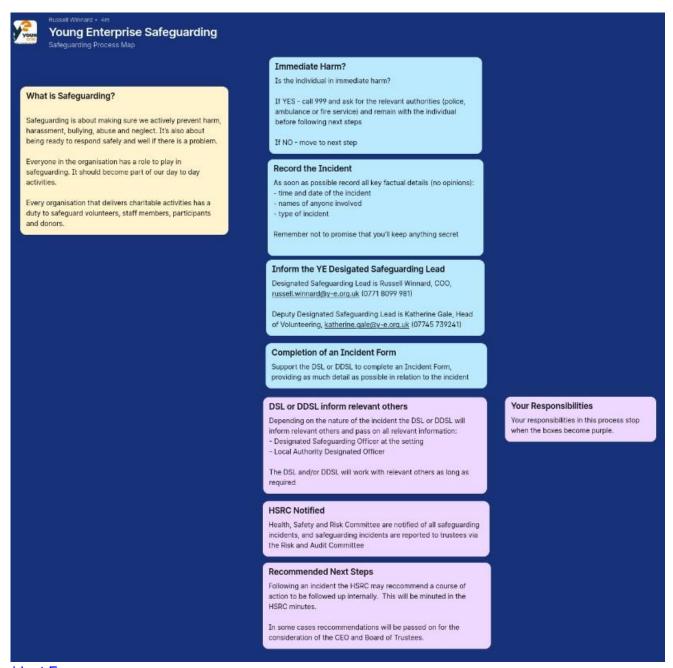
- take what you are being told seriously
- stay calm and reassure
- never promise to keep it secret
- do not investigate but record key information
- do not delay and always:
- · contact police if someone is in immediate danger
- seek advice from the DSL or DDSL.
- make a careful recording of anything you are told or observe, date and sign.

A disclosure may come from someone telling you:

- they have or are being abused
- · they have concerns about someone else
- they are themselves abusing or likely to abuse someone else

Responding to Disclosures and Concerns

We ensure and emphasise that everyone in our organisation understand and know how to share any concerns immediately with the DSL or DDSL. Everyone, including both the DSL and DDSL will deal with concerns using the following steps:

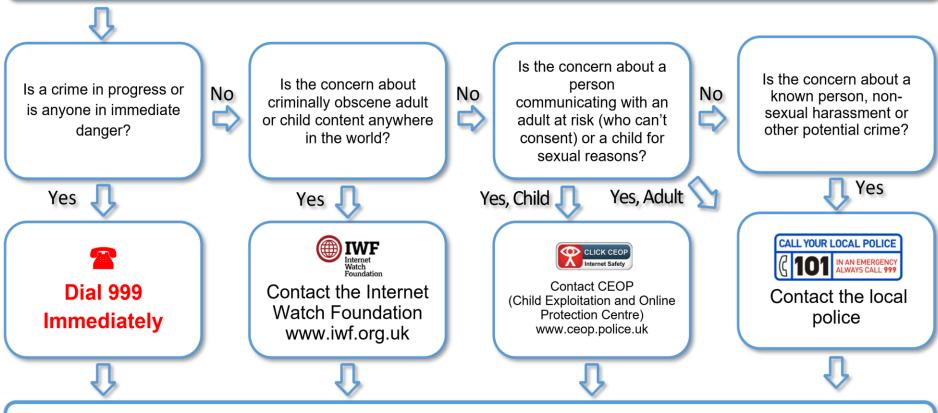


Incident Form

For any e-safety incidents the DSL and/or the DDSL will follow the below additional process when appropriate:

eSafety Referral Flowchart – Child and Adult

When illegal content or activity is found or suspected, if an emergency dial 999, always inform your Lead or Deputy for safeguarding and they will follow these steps:



Inform the Lead for Safeguarding (or Deputy if unavailable) who will liaise, await response, and review eSafety arrangements as necessary.

Confidentiality, information sharing, record keeping and Data Protection

At all times when required, and especially where there is a safeguarding concern, we are committed to keeping records and sharing information which is:

- recorded on a safeguarding <u>Incident Form</u>
- of sufficient details of child, young person or adult at risk to identify the individual who is subject of concern and any significant others
- accurate and factual/based on fact, as a true record of:
 - \circ what has been monitored/observed \circ what has been said and by whom \circ what has given cause for concern \circ what action has and/or will be taken including the reason for those actions \circ the reason stated for no action being taken and by whom
- non judgmental
- timely within 24 hours
- signed and dated by the writer and co- signed by the DSL or DDSL
- shared as appropriate by the DSL or DDSL
- stored safely and securely by the DSL or DDSL

.

Where personal data is required to be processed in conjunction with safeguarding action according to this policy, the processing activity must be undertaken in accordance with our data protection policy.

Data protection is not a barrier to sharing concerns about a child or an individual at risk. Always be open and honest about what you will do with the information. You should make a note in the safeguarding report of any express wish not to share the information but not let this prevent you from sharing. If you have any concerns about information sharing, contact the NSPCC helpline for advice.

For guidance on information sharing, see:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/72158 1/Information sharing advice practitioners safeguarding services.pdf

Lawful basis for processing information

Reliance on consent for processing personal data is not always appropriate for the following reasons:

- consent to the processing cannot be given by the data subject;
- the controller cannot reasonably be expected to obtain the consent of the data subject to the processing:
- the processing must be carried out without the consent of the data subject because obtaining the
 consent of the data subject would prejudice the provision of the protection mentioned (safeguarding
 if children and individual at risk; safeguarding of economic well-being of certain individuals)

In the circumstances mentioned above, in order to comply with our duty of care and safeguarding, we would process information raising safeguarding concerns and share them with relevant authorities when required, under the following lawful basis:

- a. Where an individual's life may be at risk we may process the data according to the UK GDPR Article 6(d) and GDPR Article 9 (c) where such processing is vital to the individual's life, and/or Art 10 UK GDPR supported by DPA 2018 Schedule 1, Part 2 paragraph 18 Safeguarding of children and of individuals at risk and/or paragraph 19 Safeguarding of economic well-being of certain individuals
- b. Where an individual or child is at risk UK GDPR Article 6(f) legitimate interest, Article 9(g), substantial public interest, Art (10) UK GDPR, supported by DPA 2018 Schedule 1, Part 2 paragraph 18 Safeguarding of children and of individuals at risk

c. Where an individual is at economic risk – UK GDPR Article 6(f) legitimate interest, Article 9(g) substantial public interest, Art 10 UK GDPR, supported by DPA 2018 Schedule 1, Part 2 paragraph 19 Safeguarding of economic well-being of certain individuals

When the above conditions are relied upon, an Appropriate Policy Document is required.

Data subjects' rights and other UK GDPR provisions may be restricted when concerning personal data processed in the circumstances described above. Restrictions on the data subjects' rights may be permitted by the exceptions included in the articles of the individual rights (UK GDPR) or by one of the exemptions included between Schedule 2 and 4 of the DPA 2018.

Examples of exemptions that might apply in the circumstances of safeguarding are the following:

- Schedule 2, Part 1, paragraph 2 (crime and taxation)
- Schedule 2, Part 3 (right of others)
- Schedule 3 Part 5 (child abuse data)

Exceptions and exemptions are applied on a case by case basis.

Records of such processing must be kept to account for the action taken. The principles of the UK GDPR must be observed at all times.

Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures

Our policies and procedures are in line with the statutory guidance and our disciplinary, complaints and grievance procedures. These are made available to everyone.

Where a complaint or allegation has been made with regards to any inappropriate behaviour or poor practice, the DSL or DDSL will, in all cases, discuss the situation with either the educational institution Designated Safeguarding Lead, social care services (the LADO with regards to children in England and Wales only) and/or the Police before making an open decision about the best way forward.

In the case where the DSL is implicated, the DDSL should be informed. In the exceptional circumstances that both are involved, the person concerned will inform the Senior Lead-

With regards to staff disciplinary and grievance procedures, we will take no steps until we have fully discussed and agreed a strategy with either the educational institution Designated Safeguarding Lead, social care services and/or the Police. Any investigation will override the need to implement any such procedures. Our management are responsible for making referrals to the relevant criminal records service.

Issues relating to volunteers will be dealt with according to our Volunteer Problem Solving policy and procedure.

Issues relating to contractors will be managed under the terms of their formal agreement with Young Enterprise.

Any allegations in relation to incidences of bullying or harassment, as they pertain to safeguarding concerns or allegations, will be dealt with according to the Equal Opportunities and Dignity at Work Policy once satisfactory safeguarding steps have been taken.

Minimising the Risks

To mitigate the safeguarding risks to children, young people and adults as risk Young Enterprise has certain practices and procedures that we undertake:

Photography & Filming Guidance

Ensure that this is conducted in accordance with the <u>Young Enterprise Photography and Video</u> Consent Policy.

Buildings and Venues

Risk assessments, which include safeguarding, will be carried out on all building and venues used by our organisation or by the host's venue management, such as schools.

Safer Recruitment

Our organisation is committed to safer recruitment in line with the relevant legislation and guidance from government for recruiting all staff and contractors.

We currently do this by:

- · advertising vacancies with a clear commitment required to safeguarding
- assigning all posts detailed job descriptions
- when a candidate is selected for interview the relevant criminal declaration form is sent for completion as set out by the Rehabilitation of Offenders Act 1974.
- always taking up two written references, one from the most recent employer or education establishment (staff only)
- · undertaking all interviews based on the job description
- having sound procedures and recording for interviewing to ensure we are satisfied, and can
 evidence that the applicant is appropriate and suitable

We are working towards:

- obtaining full personal details via an application form (not CVs) with particular relevance to previous work with children, young people and adults at risk
- ensuring at least one person on each interview panel will have undertaken Safer Recruitment training, in line with the relevant safe recruitment guidelines.

Any appointment will only be confirmed subject to:

- √ satisfactory ID checks
- ✓ any relevant criminal records check at the appropriate level, including Certificate of Good Conduct for foreign nationals and the <u>International Child Protection</u> <u>Certificate</u> (ICPC) for anyone who has lived in the UK and also travelled overseas
- ✓ a follow up of written references by telephone if relevant to the vacant post
- √ a check of essential qualifications
- ✓ confirmation of the Right to Work in the UK for employed personnel ✓ fitness to work as relevant

We take a risk management approach to the design of volunteer roles and volunteer engagement activity, including safeguarding training and enhanced DBS process for applicable roles.

Induction and Training

We have a clear induction and training strategy with clear job descriptions for staff and contractors, (role descriptions for volunteers), responsibilities and all relevant procedures. All staff, volunteers, and contractors, will receive induction training as necessary as soon as possible and they will acknowledge that they have:

- received and understood this policy.
- been given any relevant resources
- · understood the commitment to safeguarding training

When needed, staff will receive further safeguarding training, at the appropriate level, as soon as possible. We agree a probationary period of 6 months with clear goals and then provide supervision/mentoring/appraisals at regular intervals of 1 month with line managers.

Updated safeguarding training will take place with all staff annually, with updates to Level 1, Level 2 and other relevant accredited safeguarding training implemented every three years.

Staff and contractors working directly with at risk groups will undertake the free online government training for PREVENT. This is recommended, but not mandatory, for volunteers supporting at risk groups

Working Practices

Staff Ratios to Children, Young People and Adults at Risk

There must always be a minimum of two responsible adults present for any activities. A responsible adult is defined as a member of Young Enterprise staff or volunteer (with both a valid DBS check and safeguarding training completion), a Young Enterprise contractor and a member of staff associated with the educational institution in which the activity is conducted or linked to.

Lone and One to One Working/Volunteering

We will avoid lone working/volunteering of YE employees, contractors and volunteers, and one to one working/volunteering with children and adults at risk to protect both parties.

Events

From time to time Young Enterprise events take place within publicly accessible venues in local communities; for example trade fairs and competitions within YE's Company Programme.

Young people aged under 16 must always be accompanied by at least one staff member under all circumstances. Young people aged between 16 or over (Yr 12 and above) may attend events unaccompanied by responsible adults only under the condition that the Safeguarding Risk Assessment has been completed and returned to YE by the relevant educator in advance of the event.

Lone working/ volunteering expectations at events remain unchanged regardless of the age of the young people concerned. It is not considered lone working or volunteering to act in support of young people when within public areas at events. It would be considered lone working, for example, in a room separate from others, or when travelling in private transport to and from events venues where there is one adult alone with a young person or group of young people.

Young People within our Organisation

All young people who are undertaking volunteering, apprenticeships or work experience within our organisation are to be included within this policy and their safeguarding as individuals given the same importance as all young people we come into contact with. Any disclosures, observations of possible harm or concerning behaviour must be reported to the DSL or DDSL immediately.

They will also require an induction programme that includes awareness of our commitment to safeguarding within the remit of the Safeguarding Policy and in line with all staff induction. They will be provided with a key contact within Young Enterprise (this will normally be the member of staff responsible for them during their time within the organisation) and the contact information of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead. They will be made aware that any/all of these contacts can be approached should there ever be any concerns regarding their own safeguarding.

Emergency contact details for next of kin will be required from any young person working or volunteering with Young Enterprise. If working these will be provided to HR and if as a volunteer they will be provided to the Volunteering team. These will be stored confidentially and deleted in line with our data retention policy.

We will check with the relevant local authority's education welfare team to see if an employment permit is required for any young people working or volunteering with us.

Codes of Conduct

Young Enterprise aims to provide a safe environment free from discrimination, upholding and promoting equality, diversity and inclusion. All staff, contractors and volunteers for Young Enterprise undertake to:

- ✓ treat all children and young people and adults at risk with respect and dignity
- ✓ ensure that their welfare and safety is paramount at all times
- ✓ maintain professional boundaries both face to face and when using technology
- ✓ always listen to individuals and take account of their wishes and feeling
- ✓ always act in a professional way and not accept bullying, swearing or other disruptive behaviour
- ✓ avoid use of physical contact at all times
- ✓ avoid being alone with children, young people and adults at risk whenever possible
- ✓ listen to, and act upon, any disclosures, allegations, or concerns of abuse
- ✓ participate in approved safeguarding training at appropriate levels
- √ follow our safeguarding policy at all times
- ✓ make activities FUN and enjoyable

YE's Rules of Virtual Engagement governing digital call (MS Teams, Zoom & similar) interaction between staff, volunteers, and contractors with young people are intended to mitigate such risks:

- 1. The date/time for the session will be agreed in advance between staff/volunteer & the school/centre
- 2. The school's recognised & authorised representative will use their system access information/email details to set-up/convene the call
- 3. The representative will be in attendance on the call throughout the duration
- 4. There will be no direct contact between the staff/volunteer & young people outside the supervised medium of the call

Policy Date

This policy was agreed and disseminated on 21st November 2024 and will be reviewed annually or when there are substantial organisational changes.

Date of next review: September 2025