

**Stephens and George Charitable Trust**

**Safeguarding Policy**

**Safeguarding Stephens & George Charitable Trust**

The charity delivers services and events to children, Young People Adults at risk, and the general public in the local community through paid staff volunteers and students. The visitors attend The Dowlas Community Centre a centre the charity asset transferred. Activities take place online, offsite and at the centre its self.

This policy applies to all staff, volunteers at the S&GC. S&GC is committed to safeguarding, protecting and promoting the welfare of all its clients. There are variety of roles within S&GC.

**The paid roles within the charity are:**

|  |  |  |
| --- | --- | --- |
| **Position** | **Safeguarding Requirements** | **DBS requirements** |
| Charity Coordinator | Level 3 safeguarding, charity log training, staff induction and continued training. | Enhanced Check |
| Administration Assistant | Safeguarding awareness training, Charity log trainer, deals with confidential information re safeguarding | Enhanced Check |
| Youth Worker | Level 3 safeguarding. Charity log, staff induction. | Enhanced Check |
| Play Workers | Level 3 safeguarding, charity log, staff induction process. | Enhanced Check |
| Baby Book Worm Project Co-Ordinator | Level 3 safeguarding, charity log training as well as a staff induction | Enhanced Check |
| Chess in School’s tutor | Safeguarding awareness training, staff induction. | Enhanced Check |
| Child and family Counsellors | As per the BACP and undertake GDPR training, charity log training, and the charity | Enhanced Check |
| Community Wellbeing Co-Ordinator | Level 3 safeguarding, charity log training, as well as a staff induction process. | Enhanced Check |
| Entitlement Officer | Level 2/3 safeguarding, charity log training as well as a staff induction. | Enhanced Check |
| Active Inclusion officer | Safeguarding awareness training, charity log training as well as a staff induction. | Enhanced Check |
| Gym Instructor & Centre supervisor | Level/2 3 safeguarding, charity log training as well as a staff induction. | Enhanced Check |
| Café Assistant | Level 2 safeguarding, charity log as well as a staff induction. | Enhanced Check |
| Online sessional workers | Level 2 and level 3 in youth /play work.  Staff induction . | Enhanced Check |

The nominated safeguarding person for all of the roles within S&GC will be the charity coordinator who is contactable by [helen.hughes@stephensandgeorge.co.uk](mailto:helen.hughes@stephensandgeorge.co.uk). If Helen Hughes is unavailable, please contact Emma Leonard community wellbeing coordinator will be the nominated safeguarding person.

The charity also has safeguarding email which is [safeguard@stephensandgeorge.co.uk](mailto:safeguard@stephensandgeorge.co.uk) that staff and volunteers outside agencies and members of the community can report any concerns to.

S&GC commitment to make a safeguarding report containing relevant information to the local authority where there is reasonable cause to suspect abuse or neglect, or other forms of harm, to a child or adult at risk, known to our charity.

All staff and volunteers are encouraged to bring concerns (however small they may seem) to the named safeguarding personnel, but they are firmly requested not to discuss those issues, or the personal issues of anyone known to them through S&GC unless for the express reason of addressing those issues, either

* within S&GC with staff who have no reason to know of those issues
* beyond S&GC for any purpose other than in the proper pursuit of partnership working or for whistleblowing.

**Other Roles within the charity**

|  |  |  |  |
| --- | --- | --- | --- |
| Project Name | Position | Safeguarding Requirements | DBS Level |
| Literacy support | Volunteer | * Support pupils in the class room in full view of a school staff member * Safeguard and GDPR as part of induction process prior to starting volunteer role. * Teacher trainer qualification. University Graduate.   Retired Teacher | Enhanced Check |
| Afterschool  clubs | Volunteer | * Ratio one in 10 * Safeguard and GDPR as part of induction process prior to starting volunteer role. * Minimum level 2 play worker for junior club. * Minimum level 2 youth work qualification for senior club. * #nophones or computers rule for children and volunteers. | Enhanced Check |
| Half term clubs | Volunteer | * Ratio one in 10 * Safeguard and GDPR as part of induction process prior to starting Volunteer role. * Level 2 playworker Minimum standard for junior club * Level 2 Youth Worker standard for senior club. * #nophones or computers rule for children and volunteers. | Enhanced Check |
| Counselling Service | Volunteer | * Listening ear phone call to support those on the waiting list. * Paid Supervisor to support them * Referred from the university and follow course guidelines. * Safeguard and GDPR as part of induction process prior to starting volunteer role. * Weekly report to their charity supervisor and board. | Enhanced Check |
| Chess Leaders | volunteer | * Support pupils in the class room of school setting. * Safeguard and GDPR as part of induction process prior to starting volunteer role. * They will be supervised by Russell Dodington CSC a paid tutor. * Undertake CSC chess in schools training. | Enhanced Check |
| Chess Tournaments | Volunteer | * Support chess pupils in the room in full view of a chess leader / staff member * They will be supervised by Russell Dodington CSC a paid tutor. * Welsh Chess tournament staff are also present at the event and provide supervision. | Enhanced Check |
| Spread the Word | Volunteer | * Volunteer roles are well defined. * Attend 2-day training for the Festival to understand roles and responsibilities. * Safeguarding and GDPR awareness training and health and safety. * Children attend the festival under teacher /school supervision. | Enhanced Check |
| Baby Bookworm | Volunteer | * Supports guardians and children at 1hr weekly reading time event. * Level 2 food and hygiene * Play work level 2 or PGCE/ teacher training course attendee. * #nophones or computers rule for children and volunteers. | Enhanced check |
| Bursary Management | Board of Trustees | * GDPR awareness training and Charity log training. | Standard check |
| Ambassadors | Volunteer | * Volunteer induction undertaken | Always supervised when attending site or events |
| Dowlais Community Centre | Volunteer | * Volunteer induction process undertaken | Basic check or other depending on role (by self-disclosure) |
| Community Cafe | Volunteer | * Level 2 food safety certificate and supervised by Café Assistant. * Opportunity to go onto to level 3 Certificate. | Basic check or other depending on role (by self-disclosure) |
| International Visits | Volunteer | * Protocols and procedures of Erasmus understood and signed. * Volunteer induction 2-day training undertaken. | Appropriate level of supervision |
| Home shopping/Free food delivery/ Prescriptions | Volunteer | * Level 2 food and Hygiene if handling the food. * 2 day volunteer induction process. | Basic check or other depending on role (by self-disclosure) |
| Big Music – music tutors and performers | Paid role | * Music Qualifications. * Safeguard and GDPR as part of induction process prior to starting volunteer role. * As per their professional body guidelines and own safeguarding policy. | Enhanced Check |
| Sports coaches | Hire of the Hall at DCC | * Qualifications and DBS submitted with booking form. * As per their professional body guidelines and own safeguarding policy. | Enhanced checked |
| Community Service Managers |  | * SLA with Community service and all paper work and legislation documents are received. |  |
| Offsite Overnight Trips (eg Challenge Wales) |  | * SLA with the organization e.g Boys and girls clubs, CWYVYS * All standards to be met risk assessments, health and safety, ratios etc. * Act in accordance with their professional body guidelines and own safeguarding policy. | Enhanced checks with a barring list check |

**Definitions** of who is “at risk”

**Child at risk** - This describes an individual under the age of 18 years who is experiencing or is at risk of abuse, neglect or other kinds of harm; and who has needs for care and support (whether or not the authority is meeting any of those needs). When a child has been reported under section 130 of the Social Services and Well-being Act 2014, the local authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child’s welfare under section 47 of the Children Act (1989).

This applies to the young people attending the after-school clubs, and half term clubs ages 6-12 years. The baby book worm project agers 0-4 years. Chess in schools programme aged 6-12 years and reading support programme aged 5-12 years. As well as the Regulated counselling service.

**Adult at risk** - Describes anyone over 18 years of age who is experiencing or is at risk of abuse or neglect and has needs for care and support (whether or not the authority is meeting any of those needs), and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it. (S 126 of the Social Services and Well-being Act 2014). An appropriate safeguarding report will trigger safeguarding enquiries led by the local authority.

This applies to the volunteers, Active Inclusion participants aged 18 plus, as well as gym members, and referrals on the home-shopping, FREE food parcels and counselling service.

**Reporting**

The charity has a template reporting form which will be attracted to the end of this policy.

*Determine whether you have a duty to report and state where it applies:*

A duty to report (make a safeguarding report) is placed on all relevant partners of the local authority, but this does not include the third sector, as a rule. The duty may be passed onto voluntary services and agencies though their contracts and service level agreements with other relevant partners e.g. health boards, schools, the local authority, the Police, probation and youth justice. It may then apply to specific projects rather than whole organisations.

**Reporting procedure**

* Having reasonable cause to suspect, neglect or harm collating relevant information for a formal report. We are not expected to have proof but to report what is known, suspected or alleged. Not expected to investigate, this is the role of social services, the police, and can be undertaken by the NSPCC.
* There will be an Internal sharing of information on a need to know basis only and the safeguarding document will be completed and stored onto Charity Log Safeguarding officer will assess report with Safeguarding Board Trustee.
* Formal report making to Social Services, the Police or appropriate agencies.

Report Process

* Report will be compiled on the Charities safeguarding referral form. Copy attached.
* The information will be passed to the duty safeguarding person and Board of Trustee. Lisa Myton is the Safeguarding person for the Board of Trustees.
* Safeguard referral document reviewed and relevant action will be taken.

**Charity Commission**

The [Charity Commission](https://www.gov.uk/government/news/regulatory-alert-to-charities-safeguarding) regards safeguarding as a key governance priority for all charities, not just those that work with groups traditionally considered vulnerable.All organisations have a role in safeguarding people:

* Children and young people up to the age of 18 years
* Adults known to be “at risk”
* And, protect from harm all people who come into contact with your charity

**Trustees**

The Charity Commission holds the Trustees collectively to be ultimately responsible for safeguarding within their organisation. Tasks may be devolved of named/designated staff members, but it is the Trustees that the Charity Commission will contact should there be safeguarding issues and the Commission will hold the Trustees responsible for putting things right. The Trustees are responsible for making a serious incident report to the Charity Commission in a timely manner.

Links: [How to report a serious incident in your charity](https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity)

[Supplementary examples COVID-19](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/889047/Supplementary_examples_table_RSI_COVID-19.pdf)

All roles within the charity are subject to various levels of DBS checks through Vibrant Nation – clarity of eligibility for level of check per role. All roles will be subject to DBS checks, at basic, standard or enhanced level, with and without the barring lists checks, as determined by law. Existing certificates will be accepted if they are not less than 6 months old if the applicant has been employed or in a volunteer role for the entirely of the period, otherwise 3 months old, and must cover the appropriate workforce and level for the role.

Update service subscription will be accepted (if appropriate workforce and level for the role) and the Update Service subscription promoted when new checks are carried out.

Certificates which show a barring list check where this is not required may be accepted but the applicant must sign consent for the information to be seen.

**Safeguarding training** – from induction to level proportionate to role, with each role and level mapped. Induction on the S&G safeguarding policy and conduct and reporting expectations from training, regularly refreshed. Supervision for roles is provided proportionate to their contact with individuals who are “at risk”. All training is logged on our system. All staff and volunteer undertake safeguard training that as of 2021 will be updated annually.

Internally the trust has the following safeguarding triage system:

* Safeguarding Team/SMT/CEO
* Trustee for Safeguarding
* Chair of Board
* HR/Comms (as required)

All data is stored through Charity Log. There are designated log-ins for individual staff members which will enable them to have access only to projects they are entitled to view. Charity Log has a two-step log-in process with secure passwords. Charity coordinator has full access on Charity Log.

**Recruitment**

In addition to any CV which is provided, we have a staff recruitment form which captures set information (see attached).

When we recruit for positions, we call in outside partnership agency advisors to sit on the panel.

We have set interview questions which are role specific and ask a Safeguarding Scenario question relevant to the role. This is coupled with asking about a current DBS certificate, insurances, qualifications and certificates (depending on the Role).

We apply for an Enhanced DBS check which will arrive at the individual's address. We will always request to see the certificate in full in advance of confirming appointment to any role. We use Vibrant Nation to administer these checks and the DBS update service.

For basic checks:

Any unspent conviction information should be supplied separately in a sealed envelope which should only be opened if S&GC is minded to appoint the individual, at the last possible stage of recruitment, allowing for all the positive reasons for offering a candidate a role to be explored first.

For Regulated Activity:

For Regulated Activity all individuals responsible for the management or delivery of regulated activity (paid or unpaid) are required to Enhanced DBS check with appropriate barring list check which will arrive at the individual's address. We will always request to see the certificate in full in advance of confirming appointment to any role. We use Vibrant Nation to administer these checks and the DBS update service.

**Code of conduct**

The S&GC has a code of conduct that is part of the induction programme which is applicable to all roles and conduct within the organisation. The code sets the standards of behaviour that S&GC expect of their staff, volunteers, members, service users and families. Action will be taken regarding individuals who repeatedly fail to meet these standards. Significant failure will be viewed as gross misconduct, requiring 3 formal warnings, and will lead to removal of volunteers and dismissal of paid staff.

**Physical security of the environment** –

The Charity has:

* A coded door entry system on all buildings at the Dowlais Community Centre, codes are changed on a regular basis.
* CCTV cameras are present throughout the centre.
* Secure doors and roller shutter doors are secured at night and an alarm system is in place at the centre.
* All visitors and attendees to the centre have to sign in.
* There is a one-way system for all attendees at the Charity and COVID-19 appropriate PPE and hand sanitizer at buildings.
* Lockable filling cabinets are present at each office.

**Safeguarding**

Social Services and Well-being (Wales) Act 2014, Part 7 is the driver and legal framework for safeguarding in Wales. The Act promotes high quality and consistent practice across wales. Under the Data protection (DP18 and GDPR) safeguarding links to consent in policy.

All staff and volunteers at the charity have Wales Safeguarding Procedures app. <https://www.safeguarding.wales/> so they are able to keep up to date with any changes to safeguarding legislation and guidance in Wales.

The charity promotes familiarity with the Wales Safeguarding Procedures by easy access to [www.safeguarding.wales](http://www.safeguarding.wales) and the use of the app for reference, support and common terms: e.g. practitioner – any person (paid or unpaid) who role brings them into regular contact with children or adults at risk.

**Quality factors for safeguarding**

**Consent, Capacity, Confidentiality**

The role and limits of confidentiality –

* To prevent information being used or shared inappropriately,
* To protect all the people involved,
* But there is nothing in law (DP2018 or GDPR) that prevents information being shared to prevent serious harm or report a crime (before or after the event)

**The role of consent in safeguarding**

Consent – informed consent should be sought from any person about whom you are considering making a safeguarding report. The mental capacity to make this decision should be assumed unless the individual has been formally assessed to lack capacity. In which case, a “best interests” decision should be made.

**NB Exceptions**: consent is not required to report a crime or to call for emergency medical help – 999 Police or Ambulance

The duty to report, where applicable, in theory overrides any withheld consent, but the practitioner should still seek consent from the individual, and where this is withheld, should explain why they are duty-bound to make a report, which will also be based on the reasonable cause to suspect abuse. The practitioner should seek to keep the individual informed of the process which will follow. In some cases, this may mean a different contact person.

**Obtaining consent**

Child: be prepared to make a safeguarding report of suspected abuse and neglect - with or without the child’s consent – but ALWAYS try to gain consent from the child.

Where a child appears to have the capacity and understanding, they should be consulted, and their consent obtained to ensure their wishes and feelings are known.

**Parent about a child:**

When deciding whether to obtain parental consent before making a safeguarding report about a child, the overriding consideration is whether this places the child at (greater) risk of harm.

Try to obtain consent from the parent(s)/carer of the child, unless it would increase the risk of harm to the child. Aim to work in partnership with the parent(s) to safeguard the child and protect them from harm.

**Adult:** an adult can choose to give or withhold consent to a safeguarding report being made about them, except when the situations below apply. Always try to gain consent from the adult about whom you wish to make a safeguarding report.

**A report can be made without their consent when:**

* Other people may be placed at risk by the situation (e.g. known perpetrator having access to similarly at risk individuals, or to a child)
* Undue influence of another person is suspected (coercion, threat or pressure applied)

Each individual has the right to withhold consent and where they do so, should be fully informed of any actions you may still take regarding their safeguarding.

Reports made without consent should state this and explain why consent was not obtained, or sought, if this is the case. This should not affect the process of enquiries made by the local authority social services.

**Capacity**

The Act is rights based.

Rights of an adult with capacity:

* Right to make decisions deemed “risky” by others
* Right to refuse consent to a safeguarding report
* Right to refuse to participate in a safeguarding investigation (unless police involved)
* Right to change their mind!

Refusing to participate does not relieve the local authority of its duty to make enquiries / investigate, but may reduce the effectiveness of the process.

All refusals must be recorded and the decisions made in response to this.

Confidentiality is about how information which is personal and sensitive will be treated and respected, for everyone who may be involved in a safeguarding situation.

This safeguarding policy refers to our specific policies on data protection (DP 2018 and GDPR) as they apply generally in our organisation.

**Advocacy**

Advocacy is defined as any action that supports and represents the voice of the child or adult at risk ensuring that their rights are upheld and the child or adult at risk’s views and experiences are heard and respected. It is vital in safeguarding procedures if the individual concerned has any communication issues.

All individuals who are involved in safeguarding procedures and who might experience barriers in participating fully, including all children, are entitled to advocacy.

Practitioners must aim to enable them to overcome barriers by providing appropriate support/accommodations in the first instance. Their role might then be to ensure that more specialist support is accessed, and to promote access to appropriate advocacy.

An informal advocate might be a carer, friend or relative, as long as they are an ‘appropriate individual’, NOT allegedly involved in a safeguarding situation.

If there is no appropriate individual available or willing, the local authority has a duty to appoint an independent professional advocate.

**Allegations against practitioners**

Practitioners section 5: Wales Safeguarding Procedures ([Social care Wales (safeguarding.wales)](https://www.safeguarding.wales/adu/index.a5.html)

If somebody demonstrates by their conduct or attitude, or has factors in their home life, that suggests unsuitability for their role in contact with children or adults at risk, existing information will be collated and reviewed by senior management team.

The allegations against practitioners working with children or adults at risk must be taken seriously and dealt with consistently by the senior management team. Confidentiality is equally key, to support safe processes, suspension without prejudice is an option, reporting to Local Authority Designated Officer is expected, and possible tandem safeguarding procedures may be necessary.

Possible outcomes of a professional strategy meeting:

* Substantiated
* Unsubstantiated
* Unfounded
* Malicious

Actions is then undertaken in respect of these findings.

***Reference***

***The regional safeguarding board***

Reference and appendix

[Safeguarding Board Wales](http://safeguardingboard.wales/) <https://safeguardingboard.wales/>

<https://gov.wales/sites/default/files/publications/2019-05/working-together-to-safeguard-people-volume-i-introduction-and-overview.pdf>

<https://gov.wales/sites/default/files/publications/2019-06/volume-6-handling-individual-cases-to-protect-adults-at-risk.pdf>

The regional safeguarding Board https://www.cwmtafmorgannwgsafeguardingboard.co.uk/En/ReportaConcern/ReportaConcern.aspx

<https://www.charitylog.co.uk/crm-gdpr-compliance>

<https://nationalcounsellingsociety.org/have-a-concern/safeguarding-policy/>

<https://thirdsectorsupport.wales/app/uploads/2020/11/Safeguarding-Policies-Guidance.pdf>

Appendix 1

**What is abuse?**

The following is a non-exhaustive list of examples for each of the categories of abuse and neglect:

1. Physical abuse - hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions;
2. Sexual abuse - rape and sexual assault or sexual acts to which the vulnerable adult has not or could not consent and/or was pressured into consenting;
3. Psychological abuse - threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks (coercive control is an act or pattern of acts of assault, threats, humiliation, intimidation or other abuse that is used to harm, punish or frighten the victim);
4. Neglect - failure to access medical care or services, negligence in the face of risk taking, failure to give prescribed medication, failure to assist in personal hygiene or the provision of food, shelter, clothing; emotional neglect
5. Financial abuse in relation to people who may have needs for care and support includes theft, fraud, pressure about money, misuse of money, by those who are in a relationship or position of trust regarding the individual (family member, carer, professional etc.).

Possible indicators of this include:

1. unexpected change to their will.
2. sudden sale or transfer of the home
3. unusual activity in a bank account
4. sudden inclusion of additional names on a bank account
5. signature does not resemble the person’s normal signature
6. reluctance or anxiety by the person when discussing their financial affairs
7. giving a substantial gift to a carer or other third party
8. a sudden interest by a relative or other third party in the welfare of the person
9. bills remaining unpaid
10. complaints that personal property is missing;
11. a decline in personal appearance that may indicate that diet and personal requirements are being ignored
12. deliberate isolation from friends and family giving another person total control of their decision-making.