



## **SAFEGUARDING POLICY AND PROCEDURES**

### **Introduction**

Project ImpACT inspires and empowers young people to make an impact in their community and beyond, through meaningful volunteering and social action. The volunteering sessions empower and challenge young people and enable them to develop useful life skills. Project ImpACT encourages the next generation to grow into community-focused leaders. The programme runs at several locations, with central volunteering events throughout the year. Participants are able to use their volunteering hours to contribute to awards such as the Duke of Edinburgh's Award. This document sets out the policy of the Project ImpACT for the safeguarding of children and adults at risk ('vulnerable individuals').

*Adults at risk* are persons aged 18 years and over who are or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who may be unable to take care of themselves or be unable to protect themselves against significant harm or serious exploitation. Since mental health challenges can affect anyone and may not always be apparent to an observer, no assumptions will be made by Project ImpACT concerning the mental health or emotional resilience of any individual.

*Children* are those under the age of 18 years.

Tolerance, respect, understanding and the welfare of those with whom we engage are key to our ethos and to our approach to everything we do and to all those with whom we interact.

This policy sets out our commitment to the welfare and safeguarding of all vulnerable individuals with whom we engage and to providing a working environment for our staff, volunteers and stakeholders which promotes and protects these values. Furthermore, it provides practical guidance to help ensure that everyone working with or for Project ImpACT, is similarly protected and is also compliant with their and Project ImpACT's legal responsibilities for the welfare and safeguarding of vulnerable individuals.

In line with our commitment to safeguarding, we expect organisations with which we work or partner to have similarly robust policies in place. We reserve the right to request and retain on file copies of such policies. This includes organisations with which we place volunteers and from which we receive volunteer referrals.

### **Purpose of the policy**

The purpose of this policy is:

Registered address: c/- JVN, Wohl Campus, 44a Albert Road, London NW4 2SJ  
Registered charity number: 1192624

- to protect from harm vulnerable individuals with whom we may come into contact, whether through them taking part in Project ImpACT's activities or receiving Project ImpACT's services
- to provide staff and volunteers, and anyone else with whom we come into contact, with the overarching principles that guide our approach to safeguarding.

This policy applies to anyone working with or on behalf of Project ImpACT, in any capacity, including paid staff (employees and consultants), volunteers, sessional workers and children.

This policy will be made available to staff and volunteers and anyone who wishes to see it.

### **Legal framework**

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and other vulnerable people in England. A summary of the key legislation is available from [nspcc.org.uk/learning](http://nspcc.org.uk/learning).

### **Supporting documents**

This policy should be read in conjunction with any other relevant policies referred to in this policy or otherwise produced by Project ImpACT from time to time including, but not limited to, its Anti-Bullying, Whistleblowing, Equality and Diversity and Data Protection policies.

### **Safeguarding Policy**

- Every individual, without exception, will be treated with respect and is entitled to live, work, volunteer and study free from abuse of any kind, and has the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs
- We have a responsibility to promote the welfare of all vulnerable individuals, to keep them safe and to behave in a way that protects them
- We recognise that some people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with others (for example, parents, carers and other agencies) is essential in promoting the welfare of vulnerable individuals
- No individual or group of individuals will be treated any less favourably than others in being able to access services which meet their particular needs
- Concerns, and allegations of abuse will be taken seriously by staff and volunteers and responded to appropriately. This may require a referral to a partner organisation with which a particular activity takes place, if the person to whom the concerns relate falls within their duty of care, as well as to children's social care services, the independent Local Authority Designated Officer (LADO) for allegations against staff or volunteers and to the police
- Project ImpACT will aim for safe recruitment through its selection, vetting, induction and ongoing training procedures.

### **How will we seek to protect vulnerable individuals?**

We will seek to keep vulnerable individuals safe by:

- valuing, listening to and respecting them

- appointing a Principal Safeguarding officer and a lead Board member for safeguarding
- adopting child protection and safeguarding best practice through our policies, procedures and code of conduct
- developing and implementing effective online safety procedures
- providing effective management of staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- recording, storing and using information professionally and securely, in line with data protection legislation and guidance
- making sure that vulnerable individuals know where to go for help if they have a concern
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and developing a policy and procedure to help us deal effectively with any bullying that does arise
- developing an effective complaints and whistleblowing procedure
- ensuring that we provide a safe physical environment for vulnerable individuals, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff, volunteers, vulnerable individuals and their families, treat each other with respect and are comfortable about sharing concerns.

### **Our Code of Conduct**

The safety and welfare of those with whom we come into contact is paramount. We aim to ensure that the adults working for Project ImpACT directly, whether staff or volunteers, are properly recruited and vetted, are fully aware of their responsibilities and subscribe to this Code of Conduct.

- Treat all individuals equally, and with respect and dignity
- Always put the care, welfare and safety needs of vulnerable individuals first
- Design and implement activities and give advice or otherwise interact with others in such a way as to promote and protect the welfare of vulnerable individuals
- Take all reasonable steps to avoid being alone with a vulnerable individual unless with express permission and all necessary clearances (including, but not limited to an appropriate Disclosure and Barring Service certification), and to otherwise work in an open environment, avoiding unobserved situations
- Never form emotional or physical relationships with a vulnerable individual
- Never engage in rough, physical or sexually provocative games
- Never allow or engage in any form of inappropriate touching
- Ensure that any communications, including through any form of social media and when outside the immediate context of Project ImpACT work or charity related activities, are appropriate and in keeping with this Code of Conduct and principles of this policy

- Never make sexually suggestive comments to a vulnerable individual, even in fun
- Never do things of a personal nature for a vulnerable individual
- Take all reported concerns seriously and never allow allegations made by or about a vulnerable individual to go unrecorded or not acted upon
- Report immediately any suspicion that a vulnerable individual could be at risk of harm or abuse (see “What to do if you are concerned about a vulnerable individual” below)
- Fully cooperate with any investigation of suspected or alleged abuse and work in partnership with all others involved in such a process
- In the case of trustees and staff, ensure that they keep themselves informed of current legislation and guidelines on safeguarding
- Ensure that all staff and volunteers are provided with vetting, monitoring and training appropriate to their roles and level of contact with vulnerable individuals, and the means to report actual or suspected abuse.

Breaches of this Code of Conduct may lead to disciplinary action and the termination of the working relationship between Project ImpACT and the person involved. Where appropriate or necessary, incidents will be reported to the appropriate authorities.

### **Recruitment of staff and volunteers working for Project ImpACT**

Persons working directly for and with Project ImpACT as staff or as volunteers are selected with care, with appropriate precautions taken. Moreover, any adult<sup>1</sup> working directly with or for Project ImpACT (whether paid or otherwise) who will or may come into unsupervised contact with a vulnerable person, will first be subject to a rigorous recruitment and vetting which will include as a minimum, and as is appropriate to their role:

- At least one face to face interview (which can be in-person or virtual)
- At least one reference providing detail about the person’s character and workplace record, and disclosing any concerns relating to their working with vulnerable individuals.
- A Disclosure and Barring Service (DBS) check, which shall be “Enhanced” where appropriate. We note that the DBS decides who is unsuitable to work or volunteer with vulnerable individual and it is illegal for a barred person to apply for such work (paid or voluntary), or for a charity to employ a barred person in such work. It is also a legal requirement for employers to refer someone to the DBS if they:
  - dismissed them because they harmed a child or adult.
  - dismissed them because they might have harmed a child or adult otherwise.
  - were planning to dismiss them for either of these reasons, but the person resigned first.
- An induction and training programme, and ongoing training if and as deemed appropriate by Project ImpACT.

---

<sup>1</sup> Other than volunteers engaged solely to assist ad hoc at single events, during which time there is no unsupervised contact with vulnerable people.

## **Volunteers working for other organisations**

We want everyone whom Project ImpACT connects to a volunteering opportunity at another organisation to enjoy the experience in safety and free from any form of abuse. Equally, it is important that such volunteers refrain from abusive behaviour towards others. Appendix 1 sets out what we mean by abusive behaviour. We therefore expect that organisations with whom we work themselves take appropriate steps to safeguard the welfare of vulnerable individuals by ensuring that anyone they engage to work with them, including volunteers referred to them by Project ImpACT, have been properly recruited and vetted where appropriate. This includes volunteers on a one-off or ad-hoc basis or those volunteering for longer periods.

Any instances of, or suspicions about, abuse directed to or perpetrated by such volunteers that is made known to us will be dealt with in accordance with this policy and Project ImpACT's legal obligations. Nevertheless, subject to this, and in order to protect the safety and welfare of volunteers and those with whom they may come into contact, Project ImpACT expressly and explicitly requires that organisations offering volunteering opportunities must:

- Be aware of their own separate safeguarding responsibilities
- Have robust safeguarding and associated policies, protocols and practical guidance in place; and
- Undertake their own recruitment and vetting of volunteers to include, as is appropriate to the volunteering opportunity, interviews, references, DBS checks, induction and training, similar to the processes detailed above for volunteers working directly for Project ImpACT.

## **What to do if you are concerned about a vulnerable individual**

Project ImpACT has designated the following person as its Principal Designated Safeguarding Officer:

Principal Project ImpACT Designated Safeguarding Officer:

Name: Chayli Fehler

Phone: 07816 268020

Email: [chayli@projectimpact.org.uk](mailto:chayli@projectimpact.org.uk)

Project ImpACT has designated the following person as our Project ImpACT Board Lead for Safeguarding:

Project ImpACT Board Lead for Safeguarding

Name: Claire Leek

Phone: 07711017714

Email: [claire@theleeks.net](mailto:claire@theleeks.net)

You can also contact the NSPCC Helpline: 0808 800 5000

If you are concerned about an individual either because of something done or said by them or someone else, or because of something else that you observe:

You must:

- If working with another organisation such as charity, school, place of worship or otherwise, immediately make known your concerns to the designated Child Protection or Safeguarding Officer at the organisation in which you are working, or to a carer, volunteer manager, teacher or other responsible person, if they have a duty of care to that individual;
- Immediately make known your concerns the Principal Safeguarding Officer at Project ImpACT

or the Board Lead for Safeguarding (both named above)

- Make an **immediate and accurate** factual note of the circumstances giving rise to your concerns. This note is an important record for your future reference and for Project ImpACT's own records. You will need to fill in a safeguarding incident report form provided by Project ImpACT's Designated Safeguarding Officer (see Appendix 2), but do not delay making a contemporaneous note in the meantime.

You must NOT give assurances to the individual that the information disclosed by them to you will not be disclosed to other responsible persons, including those mentioned above. A child cannot refuse for this referral to occur if they have made an allegation of abuse - their welfare is paramount.

Subject to the above, you must comply with regulations relating to confidentiality and data protection, including the relevant Data Protection Policy and any related policies, and accordingly only share personal information on a need-to-know basis.

The relevant Project ImpACT Designated Safeguarding Officer will report the matter as appropriate to the relevant authorities, which may include the Local Authority's Adult Social Care or Children's Services Designated Officer (formerly LADO), the police and Child Exploitation Online Protection Centre (CEOP) for e-safety concerns. They will also retain records of the alleged incident or concerns in a secure place for future reference, in compliance with all relevant safeguarding, data protection and other regulations and guidance.

No one should feel in any way constrained from making known to an appropriate person genuine concerns, even if they cannot immediately be substantiated. The law affords particular protection to those who make known such concerns in good faith.

This policy will be reviewed, approved and endorsed by Project ImpACT's board at least annually or when legislation or guidance changes.

This policy statement came into force on 1 September 2019.

This policy statement and accompanying procedures were last reviewed on 10 January 2022.

## **Appendix 1: What constitutes abusive behaviour?**

Abuse can take many forms and may be carried out by any person against anyone else, including by one vulnerable individual against another or by an adult against a child or another adult. This could be a parent, relative, other carer or by a work colleague or someone in authority, such as a teacher or police officer.

Actions may constitute abuse whether or not they are directed at vulnerable individuals and accordingly may also result in a range of responses or sanctions.

Abuse may include, but is not limited to:

- Sexual abuse or inappropriate touching or comments of any kind, whether or not there was, or was perceived by any person, to have been consent to such behaviour
- Bullying, threatening, abusive or disparaging or mocking acts or words, including acts of actual or threatened violence or that cause emotional, physical or psychological harm
- Using undue influence and/or doing acts that cause an individual to feel compelled to act in a particular way or to do something against their will or which they do not have the legal, mental or emotional capacity to consent to doing
- Acts or omissions that result in neglect or a lack of care
- The sending by any means of material, whether in words, in pictures or otherwise, that results in abuse or exploitation of the kinds mentioned above.

## Appendix 2: Project ImpACT Safeguarding Incident Report Form

This form should be used to record safeguarding concerns relating to vulnerable individuals (ie children or adults at risk). It should be completed at the time or immediately after any disclosure to you that gives rise to concerns. Your concerns and this form should be notified to Project ImpACT's Designated Safeguarding Officer or the Board Lead for Safeguarding as soon as possible:

Principal Project ImpACT Designated Safeguarding Officer: Chayli Fehler (email [chayli@projectimpact.org.uk](mailto:chayli@projectimpact.org.uk) )

Project ImpACT Board Lead for Safeguarding: Claire Leek (email: [projectimpactuk@gmail.com](mailto:projectimpactuk@gmail.com))

All information will be treated in the strictest confidence, subject to any overriding duty to inform the relevant authorities or other parties with a duty of care to the individual(s) about whom the concerns are raised.

Your name:	
Your role (Project ImpACT staff/volunteer/other):	
Your contact information:	
<i>Address:</i>	<i>Postcode:</i>
<i>Telephone numbers:</i>	<i>Email address:</i>
Individual's name:	Individual's date of birth:
Individual's gender: Male ___ Female ___	
If the individual is a school pupil or associated with another organisation, please provide its name:	
If the individual was under the care of another person* when the concerns were made known to you, have you notified them of the concerns?: Yes ___ No ___	
<i>* This could be a parent, teacher or carer</i>	
If YES please provide details of what was said/action agreed:	
Please provide the name and any contact details you have for the person you notified (above):	
<i>Address:</i>	<i>Postcode:</i>
<i>Telephone numbers:</i>	<i>Email address:</i>
Are you reporting your own concerns or responding to concerns raised by someone else:	
<input type="checkbox"/> Responding to my own concerns	
<input type="checkbox"/> Responding to concerns raised by someone else	

If responding to concerns raised by someone else: <i>Please provide further information below</i>
<i>Name:</i>



*Position within their organisation and/or relationship to the individual:*

*Their contact details*

*Telephone number(s):*

*Email address:*

*Date and time of incident or when the concern was raised with you:*

*Details of the incident or concerns: Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.*

*Individual's account of the incident: Using their own words as far as possible*

Please provide details of anyone else who witnessed the incident or the concerns raised:

Please provide details of any witnesses to the incident:

*Name:*

*Position or relationship to the individual:*

*Address:*

*Postcode:*

*Telephone number:*

*Email address:*

Please provide details of any person whose actions are alleged to have given rise to your concerns:

*Name:*

*Position or relationship to the individual:*

*Contact details, if any (including name of school):*

Please provide details of any other relevant matters: *This may include action taken at the time or proposed to be taken*

Has the incident been reported to any external agencies?

Yes

No

If YES please provide further details:

*Name of organisation / agency:*

*Contact person:*

*Telephone numbers:*

*Email address:*

*Agreed action or advice given:*

Your Signature:		Print name:	
Date:			