



International Community Organisation of Sunderland (ICOS)

Safeguarding Policy

Who to report concerns to:

Safeguarding Officer (and online safety coordinator): Daniel Krzyszcak

Email: daniel@icos.org.uk

Phone: 07783433674

(if the safeguarding officer is implicated or not present, please contact another senior member of staff or chair of the trustees).

Purpose

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with ICOS. This includes harm arising from:

- The conduct of staff or personnel associated with ICOS
- The design and implementation of ICOS's programmes and activities

The policy lays out the commitments made by ICOS, and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under ICOS's Anti Bullying and Harassment Policy
- Safeguarding concerns in the wider community not perpetrated by ICOS or associated personnel

What is safeguarding?

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes.

Further definitions relating to safeguarding are provided in the glossary below.

Scope

- All staff contracted by ICOS
- Associated personnel whilst engaged with work or visits related to ICOS, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians

Policy Statement

ICOS believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. ICOS will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding; child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse.

ICOS commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

Guiding Principles

Everyone's responsibility - Everyone at ICOS a responsibility to keep children and adults who need care and support safe from abuse and neglect.

Prevention – We will put sensible measures in place to prevent abuse, including the use of safe recruitment practices, promoting safe working practice and raising awareness of safeguarding.

Protection – We will provide policy, procedures, information and training to enable all ICOS staff to identify and respond appropriately to concerns about abuse.

Partnership – ICOS will work in Partnership with statutory, regulatory and other relevant organisations to ensure that safeguarding concerns are responded to appropriately.

Empowerment – We will be person-centred and uphold rights in our safeguarding work

Accountability - We aim to be transparent in our approaches and recognise the need for continuous learning and improvement

Prevention

ICOS responsibilities

ICOS will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with ICOS. This includes the way in which information about individuals in our programmes is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation
- Follow up on reports of safeguarding concerns promptly and according to due process

Roles and Responsibilities

All staff and volunteers

Every individual working for ICOS, irrespective of their role, has a part to play in safeguarding children and adults who need care and support. All

staff will undertake training and must familiarise themselves with our Safeguarding Policy and Procedures.

Staff responsibilities

Child safeguarding

ICOS staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking

Adult safeguarding

ICOS staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

Protection from sexual exploitation and abuse

ICOS staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, ICOS staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by an SBIC staff member or associated personnel to the appropriate staff member

Managers

Managers are responsible for ensuring that they, and the staff that they supervise, are aware of ICOS's safeguarding policy and procedures and access relevant training. They should promote the discussion of safeguarding at team meetings and as part of supervision or one-to-one meetings. They may be required to make decisions relating to complex or serious safeguarding concerns and can seek advice from the Head of Safeguarding where required.

Trustees

ICOS trustees approve the Safeguarding Policy and have a duty of care to their charity, which includes taking the necessary steps to safeguard those at risk from abuse, managing risk and protecting the reputation of the charity. They have a responsibility to ensure that safeguarding is included, where appropriate, in the strategic plans,

Enabling reports

ICOS will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by ICOS's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

ICOS will also accept complaints from external sources, such as members of the public, partners and official bodies.

How to report a safeguarding concern:

Staff members who have a complaint or received a complaint or concern relating to safeguarding should report it immediately to their Safeguarding Officer or line manager. If the staff member does not feel comfortable reporting to their Safeguarding Officer or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a senior manager or a member of the board of trustee.

Response

ICOS will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns).

ICOS will apply appropriate disciplinary measures to staff found in breach of policy, including a suspension and in some cases- dismissal for gross misconduct.

ICOS will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

Receiving an Allegation

A member of staff who receives an allegation about another member of staff should follow the guidelines set below.

The allegation should be reported immediately to the senior management. If the allegation is about a board member, the allegation should be reported to and noted by the chairperson. If the allegation is about the chairperson, such allegation should be disclosed to another section board member, such as the secretary or the treasurer. The board will have the right to ask staff members to investigate the allegation. During the disclosure meeting, note the main points carefully. Make a detailed note of the date, time, place, what the child or person said, did and responses to your questions. Ask the person making the allegation for consent to share this information and who it can be shared with. In case of someone being in an immediate danger, the police will have to be informed even without consent.

Initial Assessment by designated person

The safeguarding officer should make an initial assessment of the allegation, consulting with the staff when appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the child or person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the Police or other appropriate supporting agencies.

It is important that the manager do not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or person. The matter should be addressed in accordance with the disciplinary procedure.

The allegation can be shown to be false because the facts alleged could not possibly be true.

Enquiries and investigations

Enquiries and investigations would normally be conducted by the senior management (the safeguarding officer will be a senior manager). The exception to this rule would be if the allegation was if the senior manager or even the safeguarding officer were implicated.

Child or young or vulnerable adult protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the Organisation. The Organisation may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the Organisation to act in a particular way, however, the Organisation should assist the agencies with their enquiries.

The Organisation shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation.

Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the senior management normally be involved in, and contribute to, the interagency strategy discussions. The senior manager is responsible for ensuring that the Organisation gives every assistance with the agency's enquiries. It will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

The senior manager must advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the police or other investigating agency, the manager (or the board) shall:

inform the child/children/person or people or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.

ensure that the parents/carers of a child making the allegation have been informed that the allegation has been made and what the likely process will involve.

inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve. Inform the Chairperson about the allegation.

The senior manager shall keep a written record of the action taken in connection with the allegation.

Suspension of Staff

Suspension should not be automatic. It can be carried out by the board, or majority of the board if the allegation is about a board member.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from specified duties.

Suspension should only occur for a good reason. For example:

-where a child or young or vulnerable adult is at risk.

-where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct. where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

Prior to making the decision to suspend, board should interview the member of staff. This should occur with the approval of the appropriate agency if necessary. In particular, if the police are engaged in an investigation the officer in charge of the case should be consulted.

The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a friend. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview, the member of staff should be given as much information as

possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but provide the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

If the senior manager or the board consider that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty.

Written confirmation of the suspension, with reasons, shall be despatched as soon as possible, and ideally within one working day.

Where a member of staff is suspended, the senior management should address the following issues: the chairperson should be informed of the suspension in writing.

the parents/carers of a child making the allegation should be informed of the suspension, as should a young or vulnerable adult making the allegation.

They should be asked to treat the information as confidential. Consideration should be given to informing a child making the allegation of the suspension. Senior staff who need to know of the reason for the suspension should be informed.

The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

The member of staff should be informed of:

-the disciplinary charge against him/her.

-his/her entitlement to be accompanied or represented by a trade union representative or friend.

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The child or children, person or people making the allegation and/or their parents as appropriate should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to Organisation of the member of staff (if suspended).

Allegations without foundation

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and other agencies informed if appropriate.

The senior management shall:

Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering support. Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome. Where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child.

Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the Organisation's statutory duty to inform the statutory body under the current legislative safe recruitment procedures.

Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Board of Trustees

together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the Organisation's procedures and/or policies

Consideration should also be given to the training needs of staff.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

Training

All staff members will receive safeguarding training at least every two years.

Vetting

All staff members and volunteers who will be required to work with vulnerable adults or children will be asked to apply for a DBS check. DBS checks no older than 24 months will also be accepted for new staff and volunteers joining the organisation. Staff and volunteers will be expected to renew their DBS checks before 24 months have passed since the last check.

Online safety:

Online abuse is any type of abuse that happens on the internet, facilitated through technology like computers, tablets, mobile phones and other internet-enabled devices (Department for Education, 2018; Department of Health, 2017; Scottish Government, 2014; Welsh Assembly Government, 2018).

It can happen anywhere online that allows digital communication, such as:

- social networks
- text messages and messaging apps
- email and private messaging
- online chats
- comments on live streaming sites
- voice chat in games.

Children young people and vulnerable adults can be revictimised (experience further abuse) when abusive content is recorded, uploaded or shared by others online. This can happen if the original abuse happened online or offline.

Children, young people and vulnerable adults may experience several types of abuse online:

- bullying/cyberbullying
- emotional abuse (this includes emotional blackmail, for example pressuring children and young people to comply with sexual requests via technology)
- sexting (pressure or coercion to create sexual images)
- sexual abuse
- sexual exploitation.

Children, young people and vulnerable adults can also be groomed online: perpetrators may use online platforms to build a trusting relationship with the child in order to abuse them. This abuse may happen online or the perpetrator may arrange to meet the child in person with the intention of abusing them.

We recognise that:

the online world provides everyone with many opportunities; however, it can also present risks and challenges

we have a duty to ensure that all children, young people and vulnerable adults involved in our organisation are protected from potential harm online

we have a responsibility to help keep children and young people safe online, whether or not they are using ICOS's network and devices

all children and vulnerable adults, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse

working in partnership with children, young people, and vulnerable adults their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety. We will seek to keep children and young people safe by: appointing an online safety coordinator [this may or may not be the same person as your nominated child protection lead]

providing clear and specific directions to staff and volunteers on how to behave online

through our behaviour code for adults

supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others

supporting and encouraging parents and carers to do what they can to keep their children and vulnerable adults they care for safe online

developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person

reviewing and updating the security of our information systems regularly

ensuring that user names, logins, email accounts and passwords are used effectively

ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate

ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given

providing supervision, support and training for staff and volunteers about online safety

examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

If online abuse occurs, we will respond to it by: having clear and robust safeguarding procedures in place for responding to abuse (including online abuse)

- providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

Given the above, ICOS expects its staff, volunteers and board members to:

-not to engage with children associated with ICOS's clients online (this includes accepting them as "friends" or equivalent on social media)

-to treat all online communication with clients as if it was off line

-if social media or online communication is used to contact clients, to maintain professional integrity at all times

-to report any concerns or doubts to the online/safeguarding officer.

Associated policies:

- Code of Ethical Behaviour
- Complaints, Bullying and Harassment policy
- Whistle-blower policy
- DBS Policy
- Children protection policy

- Other policies as appropriate

Glossary of Terms

Beneficiary of Assistance

Someone who directly receives support from ICOS. Note that misuse of power can also apply to the wider community that the ICOS's serves, and also can include exploitation by giving the perception of being in a position

of power. For the purpose of this policy, volunteers will be treated as beneficiaries.

Child

A person below the age of 18

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes. One donor definition is as follows:

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centered and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

This policy will be reviewed at least every 3 years at minimum, unless there are changes to legislation warranting an earlier amendment.

Date adopted: 30/09/2021

To be reviewed: 29/09/2024