International Community Organisation of Sunderland (ICOS)

Safeguarding Policy

Who to report concerns to:

Safeguarding Officer (and online safety coordinator): Daniel Krzyszczak

Email: daniel@icos.org.uk

Phone: 07783433674

(If the safeguarding officer is implicated or not present, please contact another senior member of staff, the Chair of Trustees, or the Vice Chair of Trustees).

External Escalation Contacts (Local Authority):

- **Sunderland LADO (Local Authority Designated Officer - for allegations against staff/volunteers):** 0191 561 7198 / lado@sunderland.gov.uk
- **Sunderland Children's Safeguarding / MASH (Together for Children):** 0191 520 5560 (Out of Hours: 0191 520 5552)
- **Sunderland Adult Social Care / Safeguarding Adults Team:** 0191 520 5552

Purpose The purpose of this policy is to protect people, particularly children, adults at risk, 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 adults at risk, 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 consultants, volunteers, contractors, and 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 addresses child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse (PSEA). 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 has 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 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. 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.
- Follow up on reports of safeguarding concerns promptly and according to due process.

Safe Recruitment & Pre-Employment Vetting All staff and volunteers who work with children or adults at risk must undergo thorough recruitment checks prior to appointment, including:

- Verification of identity and right to work in the UK.
- Obtaining at least two professional references, with specific questions regarding suitability to work with vulnerable groups.
- A check of full employment history and explanation of any gaps in employment.
- An Enhanced DBS check (or standard check depending on role). While checks must be renewed before 24 months have passed, ICOS strongly encourages all staff and volunteers to register with the **DBS Update Service** within 30 days of receiving their certificate to allow for continuous status checks.
- Overseas criminal record checks where applicable.

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

Protection from Sexual Exploitation and Abuse (PSEA)

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, staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations.
- Report any concerns or suspicions regarding safeguarding violations by an ICOS staff member or associated personnel to the appropriate staff member.

Managers Managers are responsible for ensuring that they and their supervised staff are aware of ICOS's safeguarding policy and procedures and access relevant training. They should promote the discussion of safeguarding at team meetings and during supervision. They may be required to make decisions relating to complex concerns and can seek advice from the Safeguarding Lead or statutory authorities.

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

Enabling Reports & Information Sharing

- ICOS will ensure safe, accessible means of reporting safeguarding concerns are available to staff and community members.
- Any staff reporting concerns or complaints through formal whistleblowing channels (or if requested) will be protected by ICOS's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

- ICOS accepts complaints from external sources, including members of the public, partners, and official bodies.

Consent & Mandatory Reporting

- When receiving a report, consent to share information should be sought. However, **consent can and must be overridden** without delay if:
    - A child or adult is in immediate danger or at risk of significant harm.
    - Overriding consent is necessary to prevent or detect a serious crime.
    - An adult at risk lacks the mental capacity to make the decision (acting in their best interests under the Mental Capacity Act 2005).
- In any case of immediate danger, contact the Police (999) or local Multi-Agency Safeguarding Hub (MASH) / Adult Social Care immediately.

How to Report a Safeguarding Concern: Report immediately to the Safeguarding Officer or line manager. If that person is implicated or unavailable, report to a senior manager, the Chair of Trustees, or the Vice Chair of Trustees.

Response

Receiving an Allegation

When receiving an allegation:

- Report immediately to senior management. If the allegation involves a trustee, report to the Chair of Trustees. If it involves the Chair, report to the Vice Chair of Trustees.
- Record accurate, detailed notes: date, time, place, exactly what was said/observed, and responses given.
- Perform an initial assessment to determine if immediate referral to Police, LADO (for allegations against staff working with children), or Local Authority Adult/Children's Services is required.

Enquiries and Investigations

- Enquiries are normally conducted by senior management (including the Safeguarding Officer).
- **Escalation Protocol for Implicated Senior Staff:** If all senior managers (or the Safeguarding Officer) are implicated in the allegation or a conflict of interest exists, internal management of the investigation falls to the **Chair of Trustees**. If the Chair is also implicated or unable to act, the **Vice Chair of Trustees** will assume responsibility. If internal investigation is inappropriate due to the severity or complex conflicts of interest, the Chair or Vice Chair must appoint an **independent external investigator**.

- Internal disciplinary enquiries must remain separate from formal police or social services investigations. Internal enquiries will be held in abeyance if requested by statutory authorities so as not to prejudice external criminal investigations.
- Support for survivors will be survivor-led, and ICOS will facilitate direct referrals to specialist independent support services (e.g., advocacy, trauma support) regardless of whether internal disciplinary action proceeds.

Suspension of Staff

- Suspension is a neutral, non-disciplinary act on full pay and is not automatic. Alternative options (e.g., reassignment of duties, paid leave) must be evaluated first.
- Decisions to suspend staff are made by senior management or the Board of Trustees (or majority of the Board if a trustee is involved). Prior to suspension, the staff member will be interviewed (subject to approval from police/investigating agencies) and advised of their right to trade union representation or support.
- Written confirmation of suspension with reasons will be provided within one working day.

Allegations Without Foundation If an allegation is unproven or false, the staff member will be notified in writing that no further action will be taken, and support/reintegration will be offered. A formal record detailing why the allegation had no foundation will be retained securely.

Records & Data Protection

- All records relating to safeguarding concerns, initial assessments, and investigation outcomes must be held confidentially in restricted digital/physical storage in compliance with UK GDPR and the Data Protection Act 2018.
- Records will be retained in accordance with statutory retention periods and personnel file guidelines.
- If a staff member resigns or is dismissed prior to the conclusion of an investigation, ICOS retains a statutory duty to notify the Disclosure and Barring Service (DBS) and/or relevant regulatory bodies.

Monitoring Effectiveness Following any investigation, the Board of Trustees and senior staff will review the case to identify lessons learned, update policies/procedures, and address staff training needs.

Confidentiality Confidentiality must be strictly maintained. Information is shared strictly on a **need-to-know basis** with relevant internal leads and statutory bodies.

Training All staff members and volunteers will receive role-appropriate safeguarding training at least every two years.

Online Safety

Online abuse refers to any harm facilitated through digital technology (social networks, messaging apps, email, video/voice streams).

ICOS Safeguarding Commitments Online:

- Appointing an Online Safety Coordinator (Daniel Krzyszczak).
- Ensuring images or media of children and families are captured and published **only** after explicit written consent is obtained for that specific purpose.
- Risk-assessing all digital platforms before adopting them for organizational projects.

Staff and Volunteer Online Code of Conduct:

- Staff, volunteers, and board members must **not** interact with child or adult clients via personal social media accounts (e.g., sending/accepting friend requests).
- All digital communications with clients must maintain professional integrity and follow official organizational communication protocols.
- Any suspected online grooming, cyberbullying, sexting, or illegal media sharing must be reported immediately to the Online Safety Coordinator or Safeguarding Lead.

Associated Policies

- Code of Ethical Behaviour
- Complaints, Bullying and Harassment Policy
- Whistleblower Policy
- DBS Policy
- Child Protection Policy

Glossary of Terms

- **Adult at Risk (formerly "Vulnerable Adult"):** An adult (aged 18 or over) who has needs for care and support, is experiencing (or is at risk of) abuse or neglect, and as a result of those needs is unable to protect themselves against abuse or neglect or the risk of it (Care Act 2014).
- **Beneficiary of Assistance:** Someone who directly receives support from ICOS (including volunteers for the purpose of this policy).
- **Child:** A person below the age of 18 years.
- **Harm:** Psychological, physical, and any other infringement of an individual's rights.
- **LADO (Local Authority Designated Officer):** The statutory lead responsible for managing and overseeing allegations against adults who work or volunteer with children.
- **Protection from Sexual Exploitation and Abuse (PSEA):** Measures taken to prevent and respond to sexual exploitation and abuse of beneficiaries or community members by staff or associated personnel.
- **Survivor:** The individual who has experienced abuse or exploitation (used flexibly based on personal preference).

- **Policy Review Period:** Reviewed annually or immediately upon relevant legislative updates.
- **Last reviewed:** 25/09/2026
- **To be reviewed by:** 24/09/2027