

Safeguarding and child protection policy

Social Mobility Foundation

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Introduction

The Social Mobility Foundation (SMF) is a charity that provides support to high-achieving, less privileged students. We focus on Year 12 students and offer support in the form of providing internships in their chosen careers, e-mentoring, as well as assistance in the university application process (including trips to universities and workshops) and workshops to develop their skills. Due to the nature of the SMF's work and our interaction with young people, it is important that we have a safeguarding and child protection policy specific to the type of work we do, in order to ensure the best possible protection of the students. The main areas that the policy is tailored to are internships, e-mentoring, university application assistance, and various workshops. These give an idea of the type of interaction between the young person and the adult and also an idea of how best to prevent problems from occurring.

All the staff of the SMF are aware of the important role we play in ensuring the safety of our students. This policy outlines the systems and procedures that are necessary to protect and promote the welfare of the students. In developing our safeguarding and child protection policy the SMF makes use of the guidance from Working Together to Safeguard Children (Department of Education, July 2018 2015), the relevant Local Authority (LA), the Local Safeguarding Children Boards (LSCBs), and The London Child Protection Procedures.

This policy applies to adults working in any capacity with the SMF (which includes, but is not limited to, SMF employees, volunteers, mentors, and individuals working with SMF students on internships). However, some parts of the policy are expressly stated to only apply to particular groups. All adults working with the SMF will be informed about this policy and given a copy/link to policy by the SMF.

The aims of this policy are to:

- Provide definitions of important and relevant terms
- Provide a contact list for relevant sources of information
- Outline good practice guidelines
- Supply details of the designated staff members of the SMF who will deal with safeguarding and child protection concerns
- Ensure the commitment to safe recruitment, selection and vetting
- Increase awareness amongst SMF staff and all adults working with the SMF of the possible risks of child abuse and neglect
- Ensure all adults who working with the SMF have a good understanding of safeguarding and child protection, ways in which to minimise any risks, and the action that should be taken on becoming aware of any incidents
- Ensure that all adults who work with the SMF are aware of the specific and structured response procedure to safeguarding and child protection concerns
- Establish and provide the best system for child protection and promoting the welfare of students involved with the SMF
- Express the commitment of the SMF to safeguarding and child protection

Definitions

It is important to clearly define key terms so that all staff and those involved with the SMF are aware of exactly what each term means. This is essential as this information may help in detecting whether there has been any form of child abuse, and what form it takes. Knowing the type of abuse one may be dealing with is crucial as it may dictate the way in which the situation needs to be handled. Each case is unique and therefore sensitivity to each case and its details is necessary in order to ensure the child is protected in the best way possible. We are aware that some of the forms of abuse below may not be applicable to the work the SMF carries out; it is, however, important to have a good understanding of all of them.

For the avoidance of doubt, "SMF student" means any student participating in the SMF programme, in whatever capacity and for any period of time. "Child" and "Young Person" are used interchangeably to mean any person under the age of 18.

The SMF recognises its responsibility to be alert to the potential need for early help for a student who:

- Is disabled and has specific additional needs
- Has special educational needs
- Is a young carer
- Is showing signs of engaging in anti-social or criminal behaviour
- Is in a family circumstance presenting challenges for the student, such as substance abuse, adult mental health problems and domestic violence
- Has returned home to their family from care

Safeguarding

The SMF uses the definition for safeguarding given by the UK Government in the Department of Education guidance: Working Together to Safeguard Children (2018) ("Government Guidance").

This document defines safeguarding as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

The Government Guidance defines the types of child abuse that may occur:

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to watch or take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. The abuse does not need to involve physical contact. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (and cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);

- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Good practice guidelines

All adults working with the SMF, in whatever capacity, should demonstrate exemplary behaviour. The following are common sense examples of how to create a positive culture and environment. Following these guidelines will serve as a protection for adults working with the SMF as it will help to prevent inappropriate situations from occurring.

Good practice means

- ✓ Always working in an open environment, avoiding private situations and encouraging open communication
- ✓ Treating all SMF students with respect and dignity
- ✓ Always prioritizing the welfare of each SMF student
- ✓ Maintaining a safe and appropriate distance from the SMF student
- ✓ Having the SMF student based in an office space with many people around
- ✓ Keeping doors open and blinds up, if a staff member is alone in a room with a SMF student
- ✓ Ensuring all conversations online between mentor and mentee for the e-mentoring programme are appropriate and work-related; personal details such as contact details should not be shared
- ✓ Ensuring that any form of physical activity, e.g. lifting, using step ladders, is in compliance with Social Mobility Foundation Risk Assessment Procedures
- ✓ Being an excellent role model, e.g. not drinking alcohol in the company of the SMF student
- ✓ Giving enthusiastic and constructive feedback rather than negative criticism
- ✓ Recognising the developmental needs and capacity of interns/mentees – avoiding excessive training or competition and not pushing the SMF student against their will
- ✓ If the need arises, and only if trained to do so, administering emergency first aid and/or other medical treatment and consulting the Emergency Details part of the SMF student application form
- ✓ Keeping a written record of any injury that occurs, along with the details of any treatment given, and reporting it to the Safeguarding Officer at Social Mobility Foundation
- ✓ Reporting any incidents (see below)
- ✓ Not spending unnecessary amounts of time alone with an SMF student away from others
- ✓ Not taking or dropping off an SMF student by car to another location
- ✓ Not saying anything that might make the SMF student feel uncomfortable, or which could be interpreted as aggressive, hostile or impatient

- ✓ If you are a mentor wanting to meet your mentee at outside of your workplace, you must notify the Mentoring Coordinator at the SMF and the SMF must obtain parental consent

Under no circumstances should any adult working with the SMF:

- x Arrange to meet up with a SMF student in a personal capacity
- x Engage in rough physical or sexually provocative games
- x Allow or engage in any form of inappropriate touching
- x Allow SMF students to use inappropriate language unchallenged
- x Make sexually suggestive comments to a SMF student
- x Do things of a personal nature for a SMF student that they can do for themselves
- x Invite or arrange for or allow a SMF student to visit them somewhere other than their place of work, e.g. home, pub etc.
- x Contact SMF students using personal social media accounts such as Facebook, Instagram and Snapchat
- x Give students any form of personal medication e.g. paracetamol
- x Allow allegations made by a SMF student to go unchallenged, unrecorded or not acted upon
- x Fail to report to the Safeguarding Officer at SMF anything inappropriate that a SMF student does or says

Incidents that must be reported/recorded

If you witness or are a party to any of the following you, as an adult working with the SMF, should report this immediately to the Designated Contact (see pages 8 and 12) and record the incident.

- You hurt a SMF student, even if unintentionally
- You witness any inappropriate behaviour, whether from another adult or from a SMF student
- The student seems distressed in any manner
- The student mentions they, or members of their family, are in danger at home or school
- The student mentions they want to harm themselves/others
- The student appears to be physically attracted to you or to another adult
- The student misunderstands or misinterprets something you have done
- The student makes suggestive or inappropriate comments, either in person, online or using any other form of communication
- Concerns that a student may be at risk of radicalisation, or in support of forms of extremism leading to terrorism, as defined by the Government in the Prevent Strategy (2011, Cabinet Office)

You should always feel confident to voice concerns about the attitude or actions of colleagues.

Where the SMF student is on an internship, the Internship Provider is expected to notify the SMF Designated Contact immediately upon becoming aware of any safeguarding/child protection issues.

SMF Trips and Events

The SMF has a duty of care towards students who are participating in SMF run trips and events. This duty of care covers the duration of the trip/event from the designated meeting point until the trip or event finishes, or until the student returns to the original meeting point. The SMF expects students to travel unsupervised to meeting points in their home city. SMF staff should ensure that they have emergency contact and medical information for participating students. The SMF holds no responsibility for personal belongings brought by SMF students to university visits and workshops. A separate risk register for events can be found on the SMF website.

SMF Residentials

The SMF has a duty of care towards students who are participating in a residential programme. This duty covers the duration of the residential programme from the point they arrive at the designated meeting point in the city where the residential programme is taking place until the student returns to their home city. The SMF expects students to travel unsupervised to the designated meeting point and to their home city. SMF staff should ensure that they have emergency contact and medical information for participating students with them at all times. During the residential, SMF staff are in loco parentis of the group. The SMF holds no responsibility for personal belongings brought by SMF students to residential programmes. A separate risk register for residential activity can be found on the SMF website.

SMF Critical Incident Action Plan

The SMF also has a duty of care towards students in the event of a critical accident taking place near or in close proximity to an SMF event or SMF residential. The Critical Incident Accident Plan outlines the necessary actions for SMF staff if they are alerted to a critical incident on an offsite visit or residential. All staff are expected to familiarise themselves with the process and participate in the refresher training each year.

Staff Ratios and Supervision

Department for Education guidelines recommend a ratio of one adult to every 15-20 students for those from Year 7 onwards.

Electronic Communication

Communication between SMF staff and students must take place within clear professional boundaries, and staff must ensure that all communication is transparent and open to scrutiny. All messages must be retained. If on a trip or running an event, staff must use the SMF duty phone to contact students, rather than sharing their personal phone number. If the SMF duty phone is damaged, not working or lost, and staff must call the student, then they may use

their personal phone but must ensure their number is blocked and must not share their personal number with the student.

Staff may only communicate with students on social media via the official SMF Twitter account, Instagram and Facebook page.

Photography and Videos

Upon joining the programme (s) students are asked to sign indicating whether they give consent for their photograph to be taken during SMF activities for promotional purposes. Staff have a duty of care to ensure that only students who have given consent are photographed and their photos are used for promotional purposes only. Promotional purposes include but are not limited to: the official SMF Twitter account, Facebook page, LinkedIn, SMF Annual Review, brochures and roller banners.

Safe Recruitment

Due to the fact that all adults involved with the SMF have some level of interaction with young people, it is critical that safe recruitment is practised. All staff, volunteers and mentors are to have Disclosure and Barring Service (DBS) checks. These need to be up-to-date and clear. Should there be any information revealed by the DBS check which was not previously disclosed, this will be followed up by a member of the SMF staff; if any criminal record is found, the SMF will deal with this on a case-by-case basis, and if it is found that it is not suitable for the individual to be on the programme, the individual will be excluded from the programme and other SMF events.

Employees and mentors will be trained so they know how to deal with any safeguarding concerns and will be provided with copies of the SMF's Safeguarding Policy. Volunteers, internship providers and student participants will be informed about the safeguarding policy and the procedures that are to be followed should any issues arise. All adults working with the SMF are expected to follow the good practice guidelines as set out in this Policy.

Systems and procedures

- Rubeca Hussain is the member of the SMF who is in charge of dealing with any safeguarding concerns (the "Designated Contact"). The Designated Contact is responsible for, among other things, dealing with any allegations, overseeing the referral of cases of suspected abuse to the relevant investigating agencies, providing advice and support to staff, and maintaining records of any referral, complaint or concern.
- Should the need arise, any concerns must be directed to Rubeca Hussain (Aspiring Professionals Programme Manager) either via phone (0207 183 1189) or email (Rubeca.hussain@socialmobility.org.uk).
- Once a concern has been discussed, the appropriate action will be taken and authorities will be notified if necessary, in accordance with the Response Procedure set out below.
- The SMF treats these matters with the utmost confidentiality, in accordance with the Confidentiality guidelines set out below.

- Good practice guidelines have been outlined in this Policy and therefore all staff, and any person issued with a copy of this Policy or made aware of it, are considered to be aware of the manner in which they are to conduct themselves.
- The SMF is aware of the fact that it may be difficult to establish cases of abuse. We acknowledge that the use of the expertise of social services and other authorities may be needed and will involve the relevant authorities where necessary.

E-Mentoring

With regards to e-Mentoring, a level of supervision is included due to the automatic checks by the computer system used. Inappropriate words are automatically flagged for the mentoring coordinator (and are also replaced by stars which hide the word for the recipient), and reports are monitored daily by a member of the SMF staff to ensure the content is appropriate. If content contained in the message is inappropriate, a member of the SMF staff will meet with the individual in question, and action will be taken which may result in termination of the mentor or mentee's participation in the programme.

Response procedure

This procedure for responding to safeguarding and child protection concerns and allegations is in line with the Government Guidance. If you, as an adult working with the SMF, are informed about a concern, you should:

1. Make it your priority, as such issues need to be dealt with as quickly as possible.
2. Listen carefully to the concern that is being raised.
3. Try not to ask leading questions, as these may influence the answers of the subject, and distort the evidence.
4. Record the concern in writing, making an effort to use the exact words the subject has used in order to be as accurate as possible. Details such as names, dates, times, and location should all be recorded.
5. Once you have established the problem, reassure the young person and indicate how you will act in a way that is best for the young person's safety.
6. Make it clear that you cannot guarantee absolute confidentiality as the Designated Contact must be informed. Social services and other authorities may also need to be notified. It is important to show the young person that such information will only be shared with people who will help to ensure the young person's safety and well-being. All information will be shared only via secure channels such as electronic mail.
7. Inform the Designated Contact immediately.
8. The Designated Contact should not carry out an investigation, but should review the evidence and consider the seriousness of the allegations. The Designated Contact should then refer the case to the Local Authority Designated Officer (LADO) if the allegations are that an employee has: behaved in a way that has or may have harmed a young person; possibly committed a criminal offence against or related to a young person; or behaved in a way that indicates they are unsuitable to work with young people.

The Designated Contact and the LADO will consider whether the Police or any external agency should be contacted. Every possible assistance should be provided to any external investigator in the carrying out of the investigation.

Provided that it is possible to do so without impeding the investigation or posing any risk to the young person's safety:

- The parents/carers of the young person involved should be informed of the allegation, and kept informed of any progress. If there has been any physical injury to the young person, the parents/carers should be informed immediately.
- The subject of the allegations should be informed of them, and of the progress of the investigation. Given the potential damage to career/reputation, the SMF will always aim to treat matters sensitively and to keep an open mind.

If external investigators are not required, or if the external investigation has been completed, the Designated Contact should carry out an internal investigation and consider whether to take any disciplinary action (see below).

Specific Roles

Due to the type of work the SMF is involved in, the way in which concerns and allegations are dealt with may vary depending on who the subject of allegation is and what their role and interaction with the student involves. When concerns are reported, all adults working with the SMF should follow the response procedure as set out above. However, the subsequent steps may differ depending on the individual's role:

- In the case where a complaint is made about an individual involved in a student's internship, SMF staff will meet with a senior manager from the individual's organisation to review the evidence and consider the seriousness of the allegations. Until the review has been conducted and next steps decided upon, the student must cease participation in the internship. In the case that it is decided that the individual about whom the complaint was made is not suitable to continue participating in the internship, the internship will be stopped and the student will be moved to another internship where this is possible. If no criminal offence has been committed but the individual's behaviour was deemed to be inappropriate, the individual's employer will be responsible for taking disciplinary action. If a criminal offence has been committed, the police (and any other relevant body) will be contacted to take the matter further.
- With regards to mentors, if an allegation is made about a mentor written records between mentor and mentee will be checked by SMF staff. SMF staff will look for any inappropriate content that has been shared and in cases where this is found, it will be recorded. Both mentor and mentee will be consulted to discuss the matter, and their participation in the programme may be terminated if necessary.
- It may be that a SMF student (A) is alleged to have behaved inappropriately towards another SMF student (B). The SMF will investigate the matter following the procedures outlined in this Policy. If necessary for the safety and well-being of the students, both students A and B may be suspended from the programme while the allegations are considered. If the allegations are upheld, SMF student (A) will be removed from the programme. SMF Student (B) may be removed from the programme if the allegations are

found to false or malicious. Unless it is inappropriate to do so, the student's parents/carers will be informed, together with any other relevant authorities.

Confidentiality

The SMF will make every effort to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the young person, their parents/carers and the accused person (where this would not place the young person at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect young people, facilitate enquiries, or manage related disciplinary or suitability assessment processes.

Disciplinary Action and Suspension

Where disciplinary action is taken against SMF employees, it should be done so in accordance with the SMF's Disciplinary Policy. It may be necessary to suspend the individual against whom allegations have been made if, for example:

- There is cause to suspect a child is at risk of significant harm; or
- The allegation warrants investigation by the police; or
- The allegation is so serious that it might represent grounds for dismissal.

The SMF will not suspend an employee for longer than is reasonably necessary, and the employee will continue to receive full pay and benefits during any period of suspension.

If the individual in question is not an SMF employee, the SMF will liaise with the relevant organisation (e.g. the individual's employer) to determine what disciplinary action should be taken. The SMF may terminate an individual's participation in the programme with immediate effect.

Record-Keeping

The SMF's Designated Contact will keep a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and details of any action taken and decisions reached, in a confidential file and give a copy to the individual.

Timing

It is in everyone's interests to resolve cases as quickly as possible consistent with a fair and thorough investigation. The SMF will make every effort to manage cases to avoid any unnecessary delay. However, the time taken to investigate and resolve individual cases will depend on a variety of factors including the nature, seriousness, and complexity of the allegation.

Conclusion of Investigation

If the allegation is substantiated, the individual may be dismissed from the SMF, or their participation in the SMF programme may be terminated. Further action may be pursued by the relevant authorities. The SMF will make any notifications that it is required to by law.

If it is decided on the conclusion of the case that a person who has been suspended can return to work, the SMF will consider how best to facilitate that.

If an allegation is determined to be unfounded or malicious, the SMF will alert the relevant people or external bodies if there is a concern that the young person is in need of assistance. In the rare event that an allegation is shown to have been deliberately invented or malicious, the SMF will ask the police to consider whether any action might be appropriate against the person responsible.

The SMF is aware of the importance of balancing the welfare of the young person against the potential damage that can be caused to an individual's career and reputation. All cases will be dealt with by the SMF in a sensitive manner and in a carefully measured way. In cases of abuse the SMF will ensure that the young person is put in contact with social services and/or other relevant bodies so that the necessary support is provided.

Contact List

Contact	Contact Details
SMF Contact	<ul style="list-style-type: none"> • Designated Officer: Rubeca Hussain • Email: Rubeca.hussain@socialmobility.org.uk • Phone: 0207 183 1189 • Address: The Social Mobility Foundation, 1st and 2nd Floor, 43-47 Leadenhall Market, London EC3V 1LR
Independent Safeguarding Authority	<ul style="list-style-type: none"> • Phone: 01325 953 795 • Email: isadispatchteam@homeoffice.gsi.gov.uk • Post: Independent Safeguarding Authority, Post Office Box 181, Darlington DL1 9FA
NSPCC (National Society for the Prevention of Cruelty to Children)	<ul style="list-style-type: none"> • NSPCC Helpline: 0808 800 5000 • Text phone: 0800 056 0566 • Post: Weston House, 42 Curtain Road, London, EC2A 3NH

To find the relevant central/local government service for your area, please visit:

- <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/england/legislation-policy-guidance/>
- <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/scotland/>
- <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/wales/>
- <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/northern-ireland/>

Reference List: Further Information

- NSPCC Safer Recruitment
 - <http://www.nspcc.org.uk/globalassets/documents/information-service/factsheet-safer-recruitment-legislation.pdf>

- NSPCC Child Protection in the UK
 - <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/>

- NSPCC Child Protection definitions and signs of abuse factsheet
 - <https://www.nspcc.org.uk/globalassets/documents/information-service/definitions-signs-child-abuse1.pdf>London Child Protection Procedures
 - <http://www.londoncp.co.uk/Safe Network>
 - http://www.safenetwork.org.uk/training_and_awareness/Pages/do_you_work_with_children.aspx

- Working Together to Safeguard Children (Department of Education, 2018) Appendix A
 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf