

Safeguarding Policy – V2.1

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The GoodWork Group CIC

Version Control

Version	Author	Key Changes	Approved by Board	Next Review
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2.0	Felicity Halstead	Consolidation of Adult and Child policies.	23 August 2023	23 August 2024
2.1	Felicity Halstead	Clarification of policy on Enhanced DBS Check procedure.	8 March 2024	23 August 2024

This policy document is owned by **Felicity Halstead**, CEO and Director of The GoodWork Group CIC.

Each revision must be approved by the Board of Directors of The GoodWork Group CIC.

Reviews must take place every 12 months, or more often when the need arises.

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Introduction

The GoodWork Group CIC (“GoodWork”) makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.

GoodWork supports young people aged 18-25 from marginalised backgrounds into paid internships and long-term work. GoodWork may come into contact with vulnerable adults through our internship programmes, our pre-internship recruitment processes, or through ad-hoc training and support that we provide. GoodWork may come into contact with children through our pre-internship recruitment processes, or through ad-hoc training and support that we provide.

This policy contains specific safeguards aimed at protecting the welfare of:

- Children under the age of 18
- Young people aged 18-25
- Vulnerable adults

In the context of GoodWork’s activities, a vulnerable adult may be someone with experience of homelessness, a person with a disability, a Care Leaver, or a refugee or asylum seeker. This is not an exhaustive list.

A “young person” or “programme participant” in this policy refers to an individual aged 18-25 who is engaging with GoodWork as a service user, e.g. participating in a programme, a youth engagement activity or attending a workshop. This does not include employees, Directors, or contractors who happen to fall into this age category.

The restrictions outlined in this policy are only applicable to young people who use GoodWork’s services.

This policy seeks to ensure that GoodWork undertakes its responsibilities with regard to protection of children, young people and vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support GoodWork’s Board, paid staff, volunteers and partner organisations in their practices and clarifies the organisation’s expectations.

Legislation

The principal pieces of legislation governing this policy are:

- Care Act 2014
- London Multi-Agency Adult Safeguarding Policy and Procedures

Definitions

Safeguarding

Safeguarding is about embedding practices throughout an organisation to ensure the protection of vulnerable people wherever possible and responding to incidents that arise. GoodWork defines safeguarding as:

- Protecting young people from maltreatment
- Preventing the impairment of young people's health or development
- Ensuring that young people are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all young people to have the best outcomes

Abuse can be caused by those inflicting harm or by failing to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take a number of forms, including the following:

- **Physical abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or young person. Physical harm may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury.
- **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 abuse does not need to involve physical contact.
- **Emotional or psychological abuse:** Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to young people 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 young person opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It will include bullying (and cyber-bullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people.
- **Neglect:** Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. Neglect may involve failing to protect a young person from physical and emotional harm or danger or being unresponsive to their basic emotional needs
- **Child Sexual Exploitation (CSE):** 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 under the age of 18 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.

Abuse may also take the form of:

- Domestic violence and Domestic abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Self-neglect

Definition of Vulnerable Adults

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or abuse.

This **may** include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

Responsibilities

All staff, contractors, members of the Board of Directors and volunteers have a responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures.

We expect all staff, contractors, the Board of Directors, and volunteers to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

As an organisation, we will seek to keep young people safe by:

- valuing, listening to and respecting them
- appointing a nominated child protection lead for children and young people
- adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- providing effective management for 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 and storing and using information professionally and securely, in line with data protection legislation and guidance
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, 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 ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

The Board of Directors are responsible for ensuring:

- A safeguarding policy is in place and appropriate
- The policy is monitored and reviewed
- Sufficient resources are allocated to ensure that the policy can be effectively implemented
- The CEO is accountable for their responsibilities

The Safeguarding Lead is responsible for ensuring:

- The safeguarding policy is accessible
- The policy is implemented
- The promotion of the welfare of service users
- That all staff and volunteers have access to appropriate training/information
- That concerns about safeguarding are responded to seriously, swiftly and appropriately

The Safeguarding Lead is Felicity Halstead. In her absence, Safeguarding Concerns should be escalated to the Board of Directors.

The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation. These include:

- Data protection

Safe Recruitment

GoodWork ensures safe recruitment through the following processes:

- Providing the following safeguarding statement in recruitment adverts or application details – ‘recruitment is done in line with safe recruitment practices.’
- Ensuring that job descriptions for all roles involving contact with young people will contain reference to safeguarding responsibilities.
- Shortlisting is based on formal application processes/forms and not solely on provision of CVs.
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification.
- Following our Enhanced DBS check procedure, as outlined below.

Enhanced DBS Check Procedure

Enhanced DBS checks will be conducted for all staff and volunteers working 1-2-1 with vulnerable adults or children, as well as for those expected to have significant communication with or access to their personal information.

Upon the creation of any new role or the hiring of any contractor, the Safeguarding Lead will determine whether the role requires an Enhanced DBS check. For roles not requiring an Enhanced DBS check, a standard check will take place.

Enhanced DBS checks carried out for other organisations will be accepted, providing they are dated within 3 years of the individual’s start date.

For posts requiring an Enhanced DBS check, GoodWork will require that check to be renewed every 3 years, or for the individual concerned to use the DBS update service to maintain their check.

Staff and Contractors

For staff and contractor roles, Enhanced DBS checks will be carried out wherever a candidate is expected to work directly with young people and/or have access to their personal data.

Directors

Members of GoodWork’s Board of Directors will be expected to undergo an Enhanced DBS check.

By exception, a Director may be appointed while the DBS check process is still ongoing. This might happen where and the process has been delayed due to circumstances outside their control, such as additional checks required for those who have spent time

abroad. In such circumstances, they must not have any unsupervised access to programme participants or their data.

Volunteers

For volunteer roles, Enhanced DBS checks will be carried out wherever a volunteer is expected to spend time 1-2-1 with any young person through GoodWork's programmes.

For example, a mentor or coach partnered with a young person on GoodWork's programme will always require an Enhanced DBS check. A facilitator delivering a one-off training session under the supervision of the GoodWork team would likely not require a check.

Scope

Our DBS checking process applies only to those who work as part of our wider programme team (including volunteers) to deliver our programme activity. Our partner employers are responsible for their own processes and policies to protect the welfare of vulnerable people.

On occasion, the GoodWork team may make one-off introductions to people in our wider networks to support our programme alumni or participants to build professional connections. This falls outside the scope of our programme delivery activities and we would not expect to carry out DBS checks or onboard those involved as volunteers.

In such situations, the Safeguarding Lead must be made aware of the intention to make an introduction and any concerns that the programme team might have about the welfare or vulnerability of the young person in question.

[The recruitment of ex-offenders](#)

- All positions at GoodWork involve a degree of responsibility for the safeguarding of vulnerable people. Therefore, all positions are exempt from the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020). All applicants must declare all previous convictions and cautions, including those which would normally be considered "spent", except those which are classed as protected offenses.
- For positions where a criminal records check is deemed necessary, this will be clearly signposted throughout the recruitment process.
- GoodWork encourages candidates (both volunteers and staff) to declare details of their criminal record at an early stage in the recruitment process. This information will only be shared within GoodWork on a need-to-know basis.
- GoodWork undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing any offer of employment.
- Having a criminal conviction will not necessarily preclude candidates or volunteers from working with us. Each case will be looked at on an individual basis and will

depend on the nature of the position and the circumstances of the offence. However, in no circumstance will we recruit candidates who have been convicted of an offence against children or vulnerable people.

Training and Support for Staff and Volunteers

GoodWork is committed to investing resources into induction, staff training, effective communications and support mechanisms in relation to Safeguarding.

Induction

During staff induction, safeguarding issues should be introduced through:

- Discussion of the Safeguarding Policy (and confirmation that it has been read and understood)
- Discussion of other relevant policies
- Ensuring familiarity with reporting processes

New members of staff who work directly with programme participants will be assessed on their competence in applying safe practices as part of their probation period.

Training

All staff and volunteers who, through their role, are in contact with vulnerable adults will have access to safeguarding training at an appropriate level. Sources and types of training will include:

- For staff:
 - NSPCC Safeguarding 16 to 25 year olds Training
- For Members of the Board of Directors:
 - NSPCC Safeguarding Training for Charity Trustees

Support

We recognise that involvement in situations where there is risk of harm, or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include:

- Debriefing support for staff so that they can reflect on the issues they have dealt with.
- Mental health support is available as an employee benefit and will be signposted by the Safeguarding Lead in the event of any concerns being raised.
- Any member of staff who has reported a safeguarding concern will be contacted by the safeguarding lead within one working day.

Good Practice and Professional Boundaries

GoodWork expects its staff to demonstrate exemplary behaviour in all circumstances. Professional boundaries are what define the limits of a relationship between GoodWork's staff and the young people we support. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.

GoodWork expects staff to protect their own professional integrity and that of the organisation. This section covers guidance on maintaining professional boundaries and best practice for working with young people.

Giving and receiving gifts

GoodWork does not allow staff or volunteers to give gifts to programme participants. However, gifts may be provided by the organisation as part of a planned activity or to celebrate an event or occasion (for example, a birthday cake may be given to a programme participant should their birthday fall on a training day).

GoodWork recognises that programme participants may give a member of staff or volunteer a small gift to thank them for their support. Staff and volunteers are not to encourage gifts from programme participants. Appropriate responses for the receipt of gifts will be discussed as part of staff onboarding.

Staff contact with programme participants

Personal relationships between a member of staff or volunteer and programme participant are prohibited. This includes relationships through social networking sites, other than LinkedIn.

It is prohibited to enter into a sexual relationship with any person who has been a provided with a service or participated in a programme over the preceding 12 months.

If a member of staff is found to be in breach of this policy, they can expect to face disciplinary action, potential dismissal and (dependent on the age of the young person in question), referral to the police.

Good Practice Guidelines

- Treat all programme participants with respect and dignity, being constructive rather than critical.
- Always prioritise programme participant welfare, even where it might risk compromising the success or enjoyability of the programme.
- Avoid suggesting that GoodWork's programmes are for the disadvantaged or using any language that might be deemed demeaning or offensive.

- In interactions with programme participants, remember that they may never have engaged with a professional workplace before or may have had very limited interactions with adults outside their family and school – fostering a supportive, nurturing environment is essential.
- Under no circumstances should staff say or do anything that could be interpreted as aggressive or hostile, use abusive language or make sexually suggestive comments to programme participants.
- Staff should not sell to or buy items from programme participants, accept responsibility for any valuables on behalf of programme participants or lend money to/borrow money from programme participants.

Communications with programme participants

Under no circumstances should staff or volunteers pass on the personal contact details of programme participants to any third party, without the express permission of the programme participant in question.

GoodWork staff should not share their personal contact information (e.g. personal mobile number or email address) with programme participants.

Conflicts of Interest

Should a member of staff have an actual or potential conflict of interest (for example, an existing personal relationship with a programme participant, or someone known to a programme participant), they should discuss this with the Safeguarding Lead at the first possible opportunity.

Should any of the guidelines in this section be breached, staff can expect to face disciplinary action.

Reporting Safeguarding Concerns

The process outlined below details the stages involved in raising and reporting safeguarding concerns at GoodWork.

1. Communicate your concerns to the Safeguarding Lead.
 - a. Ensure that concerns are recorded in writing fully and accurately in a timely manner.
 - b. Ensure that concerns are shared only on a need-to-know basis.
2. With guidance from the Safeguarding Lead, concerns should be discussed with the adult in question and their permission to make a referral sought if appropriate.
3. Should a referral need to be made, the Safeguarding Lead will contact the relevant Local Authority's Adult Social Care team (the Local Authority in which the relevant person lives or has lived most recently).

Contact Information:

The Safeguarding Lead is Felicity Halstead, who can be contacted by emailing felicity@goodwork.org.uk or calling 07783 372 455.

In Felicity's absence, safeguarding concerns should be escalated to the Board of Directors, who can be contacted by emailing hello@goodwork.org.uk.

Responding to Allegations of Misconduct

GoodWork recognises its duty to report concerns or allegations against its staff, Board Members or volunteers, whether those concerns are raised by other members of our team, programme participants, or another organisation.

The following process should be used to make a report about safeguarding concerns pertaining to GoodWork staff, volunteers, or Board Members:

1. In the first instance, the concerns should be written down and shared with the Safeguarding Lead.
2. The Safeguarding Lead should contact the Local Authority Designated Officer for advice. As GoodWork is currently a remote working organisation, the Safeguarding Lead should contact their own Local Authority.
3. The Safeguarding Lead should follow the advice provided.

GoodWork recognises its legal duty to report any concerns about unsafe practice by any of its staff, Board Members or volunteers to the Disclosure and Barring Service, via gov.uk: <https://www.gov.uk/report-unfit-work-children-vulnerable-adults>

Data Protection and Information Sharing

Information will be gathered, recorded and stored in accordance with GoodWork's Data Protection Policy.

All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. However, information will be shared on a need to know basis only, as judged by the Safeguarding Lead.

All staff must be aware that they cannot promise programme participants or their families/carers that they will keep secrets.