



# Safeguarding & Child Protection Policy

Policy No.

**SG**

**1**

<b>Originator Name</b>	MS	
<b>Implementation Date</b>	1 <sup>st</sup> April 2020	
<b>Date of next review</b>	31 <sup>st</sup> March 2022	
<b>Related policies</b>	Freedom To Speak Up (Whistleblowing) Policy Referrals To Statutory Bodies Policy	

## Version History

Version	Author	Revisions Made	Date	
V.1	Mark Smith	Old versions updated & reviewed	April 2020	

## Review Dates

Version	Committee Name	Date of Sign Off	
V.1.0	SMT	01.04.2021	
V1.1	Update for Lead & SMT	01.04.2022	

This policy is managed by our Chief Operating Officer, reviewed annually by our Senior Management Team and is given full sign off and endorsement by our Chief Executive Officer

This policy is reviewed on an annual basis by the Senior Management Team

**This policy applies to all staff, including senior managers and the board of trustees, volunteer, mentors and sessional workers, agency staff, students or anyone working on behalf of Career Ready.**

**The purpose of this policy:**

- To protect children and young people who receive Career Ready services and interventions.
- To provide staff and volunteers with the overarching principles that guide our approach to safeguarding and child protection

Career Ready believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and keep them safe. We are committed to practise and work in a way that protects them.

**Legal Framework:**

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely;

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding and Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015
- Working together to safeguarding children; a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015

**About Career Ready**

Career Ready is a national charity that connects young people to the world of work through a range of interventions which are delivered under a programme framework. The interventions include:

- Mentoring
- Workplace visits
- Internships and work placements

- Masterclasses

The first three interventions take place on both a group and individual basis. Masterclasses are only delivered to groups. All interventions may happen outside the classroom, most commonly at an employer premises.

Students who participate in the Career Ready programme are aged over 16. They may be enrolled at a school sixth form, FE College or Sixth Form College. A few of our students are aged 19 and over. Our students are based in England, Wales, Northern Ireland and Scotland.

### **About this policy and related procedures**

Due to the nature of Career Ready'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 young people. The main areas that the policy addresses are mentoring, work placements/internships, workshops and employer visits. 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 occurring. We are aware of the important role we play in ensuring the safety of the young people who participate in the programme. This policy outlines the systems and procedures that are necessary to protect and promote the welfare of students.

This policy applies to adults working in any capacity with Career Ready, including Career Ready employees, volunteers, mentors, workplace supervisors for internships and work experience. However, some parts of the policy apply expressly to particular groups. All adults working with Career Ready will be informed about this policy and where a copy can be obtained.

#### ***This policy aims 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 Career Ready staff who deal with safeguarding and child protection
- Ensure the commitment to safe recruitment
- Increase awareness of the possible risks of child abuse and neglect among adults working for and with Career Ready
- Ensure all adults who work with the Career Ready have a good understanding of safeguarding and child protection, ways in which to minimise risks, and the action that should be taken on becoming aware of any incidents.
- Ensure that all adults who work with Career Ready are aware of the structured response procedure for safeguarding and child protection cases
- Establish and provide the best system for child protection and promoting the welfare of students involved with Career Ready
- Express the commitment of Career Ready to safeguarding and child protection

### ***Definitions in this policy and related procedures***

Understanding different types of abuse is crucial as it dictates the way in which the situation needs to be dealt with. 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 Career Ready carries out, but it is still important to have a good understanding of all of them.

For the avoidance of doubt, "Career Ready student" means any student participating in the Career Ready 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. We consider those students over the age of 18 to be covered by this policy and procedure as they may fall into the vulnerable category.

***Safeguarding:*** 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 types of child abuse that may occur include:

**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 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 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 will include bullying (and cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**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 failing to protect a child from physical and emotional harm or danger or being unresponsive to their basic emotional needs.

## **Mental Health**

Teenage years are when good mental health patterns are developed. Young people can have a range of experiences which may affect their ability to build emotional resilience and their ongoing psychological development. The types of challenges that young people may experience include:

- family breakdown
- pressure to have access to money
- body image pressure
- 24 hour social networking
- Bullying on and offline
- early sexualisation
- academic pressure.

The guidelines in this policy relate to not just abuse but also any concerns that arise regarding mental health.

Young people may seem distressed, distant or retracting 'into themselves', may seem to have developed very low self esteem, weight loss, may be self harming, showing signs of being particularly depressed or even 'hyper'.

## **Good practice guidelines**

All adults working with Career Ready, 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 protection for adults working with Career Ready as it will help to prevent inappropriate situations from arising.

### **Mentoring best practice**

Career Ready processes all DBS/PVG clearance for mentors. When a mentor has begun the DBS/PVG clearance process, but has not received full clearance, Career Ready policy is that:

- The mentor and student meet only in a school/college setting which is supervised (i.e., in the library in sight of a member of staff)
- The mentor and student do not exchange contact details. Arrangements for the next meeting should be confirmed at the current meeting, or facilitated by a member of staff.

The Career Ready programme is delivered at school/college level and therefore implementation of the Career Ready Safeguarding Policy is the responsibility of the school/college/local authority. Where the school/college/local authority policy does not align with the Career Ready policy, then Career Ready must be informed how relationships between mentors not cleared and their allocated student are being managed.

For example:

- If a school/college/local authority wants mentors and students to meet external to the school/college before clearance is gained, written notice must be given to Career Ready.
- If a school/college/local authority wants student contact details to be shared with mentors who are not cleared, using the Career Ready dashboard, written consent must be given to Career Ready

### ***What good practice means***

- Where possible, work in an open environment, avoiding private situations and encouraging open communication
- Treat all Career Ready students with respect and dignity
- Always prioritise the welfare of each Career Ready student
- Maintain an appropriate distance from the Career Ready student
- Put the Career Ready student based in an office in a space with other people around
- Keep doors open and blinds up, if a staff member is alone in a room with a Career Ready student, unless there is an issue of confidentiality
- Be an excellent role model e.g. not smoking in the company of the student
- Give enthusiastic and constructive feedback where possible rather than negative criticism
- If the need arises, administer emergency first aid and/or other medical treatment, but this must be reported in line with the hosting organisation's/venue's policy and procedure, and Career Ready must be notified
- Report any incidents (see below)
- Not spending unnecessary amounts of time alone with a Career Ready student away from others
- Not taking or dropping off a Career Ready student by car to another location without letting someone else know
- Not saying or doing anything that might be interpreted as aggressive or hostile
- Not doing things of a personal nature for a Career Ready student that they can do for themselves

***Under no circumstances should any adult working with Career Ready:***

- Engage in rough physical or sexually provocative games
- Allow or engage in any form of inappropriate touching
- Allow Career Ready students to use inappropriate language unchallenged
- Make sexually suggestive comments to a Career Ready student
- Meet with their student in an inappropriate place, e.g., a nightclub
- Allow allegations made by a Career Ready student to go unchallenged, unrecorded or not acted upon
- Fail to report to Career Ready anything inappropriate that the student does or says.

**Incidents that must be reported/recorded**

If you witness or are a party to any of the following, as an adult working with Career Ready, you should report this immediately to the Career Ready Safeguarding Officer (see page 8 for contact details) and record the incident.

- You hurt a Career Ready student, even if unintentionally
- You witness any inappropriate behaviour, whether from another adult or from another Career Ready student
- The student seems distressed
- The student mentions they 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.

You should always feel confident to voice concerns about the attitude or actions of colleagues. Where a Career Ready student is on an internship, the Internship Provider is expected to notify Career Ready and the school/college immediately upon becoming aware of any safeguarding/child protection issues.

**Career Ready events**

Career Ready has a duty of care towards students who are participating in Career Ready organised events. This duty of care covers the duration of the event from the designated meeting point until the event finishes. Career Ready is responsible for undertaking, or obtaining from the venue, a risk assessment for the visit and ensuring there are an adequate number of qualified first aid staff present.

***When a teacher/ school/college representative attends an event with the students***

When a teacher or other school/college representative is attending with students, the students remain the duty of care of the school/college. Career Ready will provide a

risk assessment of the venue but it is expected that the school/college representative takes full responsibility for their students for the entire duration of the visit.

***When students attend an event independently of the school/college***

Career Ready expects students to travel to the event. Career Ready will provide a risk assessment to the school/college and a letter that can be passed to parents – this is at the school/college’s discretion. Career Ready staff should ensure that they have emergency contact details for each student that attends, and should call a parent/carer should a student become unwell or if there is a concern regarding the student’s welfare. Career Ready accepts no responsibility for personal belongings brought by students to events.

***Staff ratios and supervision***

Each Local Authority defines the appropriate number of staff for trips and visits and therefore it is the responsibility of the school or college to ensure they send enough staff as per their school/college/local authority guidelines. Career Ready follows a guideline of one member of staff for every 15-20 students. These members of staff may include adults from the hosting organisation who support the event.

**Communications**

***Electronic Communication***

Communication between Career Ready staff and students must take place within clear professional boundaries, and staff must ensure that all communication is transparent and open to scrutiny. Career Ready staff must use their Career Ready mobile phone to contact students, rather than sharing their personal phone number. If their Career Ready phone is damaged, not working or lost, and staff must call the student, then they may use their personal phone but ensure their number is blocked and do not share their personal number with the student. Staff may only communicate with students on social media via the official Career Ready social media outlets. Personal phones may be used by staff when acting as mentors.

***Photography and Videos***

Career Ready will take photos and videos at events and Career Ready activities. Career Ready will gain permission from students before using the photos. Students will be asked to sign a Photography Permission Form. Media captured will be used for promotional purposes only. Promotional purposes include; official Career Ready social media, website and Career Ready publications.

**Recruitment**

All Career Ready staff and mentors (volunteers) are to have Disclosure and Barring Service (DBS) checks, Access NI checks or PVG checks depending on where in the UK they are based. These need to be up-to-date. Should there be any information revealed by the DBS/other

check which was not previously disclosed, this will be followed up by a member of the Career Ready staff; if any criminal record is found, Career Ready will deal with this on a case by case basis and if it is found that it is not suitable for the individual to volunteer as a mentor on the programme, the individual will be excluded.

Employees and mentors will be trained so they know how to deal with any safeguarding concerns and will be in possession of the Career Ready 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 Career Ready are expected to follow the good practice guidelines as set out in this policy.

### **Systems and procedures**

Any concerns must be directed initially to the school/college's Career Ready coordinator, and then to either:

- Mahad Ali ([mahad.ali@careerready.org.uk](mailto:mahad.ali@careerready.org.uk)) 020 7986 5494

**OR**

- Trefor Wilkinson ([trefor.wilkinson@careerready.org.uk](mailto:trefor.wilkinson@careerready.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.
- Career Ready 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
- Career Ready is aware of the fact that it may be difficult to establish cases of abuse, and therefore our role is to record and pass information on to the school/college Safeguarding Officer who must then liaise as appropriate with experts in social services and other authorities.

### ***Procedure for responding to safeguarding and child protections concerns***

If you, as an adult working with Career Ready, are informed about a concern, you should:

- Make it your priority; as such issues need to be dealt with as quickly as possible
- Listen carefully to the concern that is being raised
- Try not to ask leading questions, as these may influence the answers, and distort the evidence
- 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

- 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
- 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 that 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.
- Inform the Designated Contact immediately
- The Designated Contact should not carry out an investigation, but should review the information and ALWAYS pass to the school/college Safeguarding Officer. It is the responsibility of the school/college Safeguarding Officer to then take the necessary action to ensure the situation is resolved / addressed appropriately. Career Ready's responsibility is to follow through on actions allocated. Assistance will be provided to external investigators.

Provided that it is possible to do so without impeding the investigation or posing any risk to the young person's safety, Career Ready recommends to the school/college that:

- 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, Career Ready will always treat matters sensitively and with an open mind.

Once the investigation has concluded, Career Ready senior managers must then take any necessary steps if the matter involved a member of staff or volunteer.

### ***Specific Roles***

Due to the type of work that Career Ready 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 child involves. When concerns are reported, all adults working with Career Ready should follow the response guidelines set out above, using the processes described in Appendix 1. 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, Career Ready staff will speak with a senior manager from the individual's organisation to review the evidence and consider the seriousness of the allegations. The student must cease participation in the internship until the outcome is determined and next steps decided upon. In the case that it is decided that the individual 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 regard to mentors, if an allegation is made against them Career Ready staff will look for any inappropriate content that has been shared and in the cases where this is found, it will be recorded. Both mentor and mentee will be consulted to discuss the matter, and may be withdrawn from the programme if necessary.
- It may be that a Career Ready student (A) is alleged to have behaved inappropriately towards another Career Ready student (B). Career Ready 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, student (A) will be removed from the Programme. Student (B) may be removed from the programme if the allegations are found to be 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***

Career Ready 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, parents and 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 processes.

### ***Disciplinary Action and Suspension***

Where disciplinary action is taken against Career Ready employees, it should be done so in accordance with Career Ready'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 be grounds for dismissal.

Career Ready 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 a Career Ready employee, we will liaise with the relevant organisation (e.g. the individual's employer) to determine what disciplinary

action should be taken. Career Ready may terminate an individual's participation in the programme with immediate effect.

### ***Record-Keeping***

Career Ready 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. This will be recorded on the Safeguarding spreadsheet and information saved on the individual's confidential file (student, volunteer or staff).

### **Timing**

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Career Ready will make every effort to avoid any unnecessary delay. However, the time taken to investigate and resolve individual cases depends 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 Career Ready, or their participation in the Career Ready programme may be terminated. Further action may be pursued by the relevant authorities. Career Ready will make any notifications that are required by law. If it is decided on the conclusion of the case that a person who has been suspended can return to work Career Ready will consider how best to facilitate that.

If an allegation is determined to be unfounded or malicious, Career Ready will alert the relevant people or external bodies. In the rare event that an allegation is shown to have been deliberately invented or malicious, Career Ready will ask the police to consider whether any action might be appropriate against the person responsible.

*Career Ready 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 in a sensitive manner and in a carefully measured way. In cases of abuse Career Ready 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.*

### **Contacts**

Initial general enquiries should be directed to Trefor Wilkinson on 079 4043 3711 / [trefor.wilkinson@careerready.org.uk](mailto:trefor.wilkinson@careerready.org.uk)

**Designated Safeguarding Officer (DSO)**

Name: Sian Robertson, Director of Programmes

Phone / email : 07525754829 [sian.robertson@careerready.org.uk](mailto:sian.robertson@careerready.org.uk)

**Deputy DSO**

Name: Trefor Wilkinson, Head of Operations

Phone / email: 079 4043 3711 [trefor.wilkinson@careerready.org.uk](mailto:trefor.wilkinson@careerready.org.uk)

**Senior Lead for Safeguarding**

Name: Sian Robertson, Director of Programmes

Phone / email : 07525754829 [sian.robertson@careerready.org.uk](mailto:sian.robertson@careerready.org.uk)

PVG Officer for Scotland:

Laura Tanton: [laura.tanton@careerready.org.uk](mailto:laura.tanton@careerready.org.uk)

DBS Officer for England and Wales

Trefor Wilkinson: [trefor.wilkinson@careerready.org.uk](mailto:trefor.wilkinson@careerready.org.uk)

**Further Information**

NSPCC

NSPCC Helpline: 0808 800 5000

Text phone: 0800 056 0566

Weston House

42 Curtain Road

London

EC2A 3NH

## **Appendices**

Appendix One: Process for managing a disclosure or concern

### **Appendix One: Internal Career Ready Processing Process**

Please follow this process to report and process disclosures

#### **Step one**

Disclosure reported to Career Ready. The source may be one of:

- Student
- Volunteer (mentor, internship or work placement supervisor etc.)
- Teacher/Coordinator
- Other connected to one of the above

Inform the Career Ready Senior Manager for Safeguarding

#### **Step two**

Log disclosure on the Safeguarding Spreadsheet and create a folder in the secured Safeguarding folder on shared drive to save the emails and other correspondence in relation to the disclosure.

#### **Step three**

Depending upon the person making the disclosure, it may be necessary to inform one or more of the following people:

- School or college Safeguarding Officer
- Employee's manager
- Employer HR Manager
- School or College Coordinator
- Others

From this point please follow the section on 'Systems and Processes' outlined on page five onwards.