



PROJECT SAFE CARE POLICY

<u>INTRODUCTION</u>								
INTRODUCTION & RATIONAL	<p>SSG Activities is a high-quality provider of activities and activity-based opportunities which offers services to wide range of bespoke projects across a varied customer base. Each SSG Activity project accesses the wide range of different types of activities in a unique blend to suit different customer outcomes, venues, participants and structure for delivery resulting in SSG Activities delivering many different project designs.</p> <p>To support the SSG Activities operational team in the successful execution of these different projects, a standardised and consistent framework has been created which will obtain all the information relating to project safe care standards.</p>							
PURPOSE & USAGE	<p>The purpose of the SSG Activities safe care policy is to clearly outline the SSG Directors expectations relating to ensuring safe care standards are maintained and monitored within the delivery of projects.</p>							
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SSG ACTIVITIES – PROJECT SAFE CARE POLICY

SAFEGUARDING OF CHILDREN AND VULNERABLE ADULTS

This document is to be read by all members of staff employed by SSG and to be available to all customers upon request.

How do we define a 'child'? England, Wales, Northern Ireland and Scotland each have their own guidance for organisations to keep children safe. They all agree that a child is anyone who is under the age of 18. (<http://www.nspcc.org.uk/preventing-abuse/child-protectionsystem/legal-definition-child-rights-law/legal-definitions/>)

How do we define a 'vulnerable adult'? "Who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care or unable to protect him or herself against significant harm or exploitation". This definition of an Adult covers all people over 18 years of age. (<http://www.safeguardingmatters.co.uk/the-new-disclosureand-vetting-service/in-the-news/recent-cases-relating-to-vulnerable-adults/>)

What is meant by 'abuse'? Child & Vulnerable Adult abuse is the abuse of relationships. It is a misuse of power and a betrayal of trust. The results of abuse have an immediate and harmful effects which may remain with the child throughout later life. The consequences of the pain of child/vulnerable adult abuse are frequently more harmful than most people realise and unresolved child abuse issues follow the child into adulthood.

The Home Office/Department of Health Guidelines "Working Together" (1991) identifies four categories of child and vulnerable adult abuse. These are: Physical Abuse, Emotional Abuse, Sexual Abuse and Neglect.

- Physical abuse means injury to a child/vulnerable adult that has been intentionally inflicted or knowingly not prevented.
- Emotional abuse means a persistent lack of affection, continual rejection, isolation, exclusion, deliberate humiliation or threats. It may also refer to an absence of praise, encouragement and stimulation.
- Sexual abuse means using children/vulnerable adults for sexual gratification or knowingly failing to protect them from sexual harm. Sexual abuse includes harassment, touching the child/vulnerable adult in a sexual manner, encouraging the child/vulnerable adult to touch another person in a sexual manner, the use of inappropriate sexual language, exposing the child/vulnerable adult to sexual images, text or imagined situations or photographing children/vulnerable adults in indecent sexual poses.
- Neglect means the failure to meet a child/vulnerable adult's basic needs and includes failing adequately to provide such things as food, drink, warmth, adequate clothing and protection from danger or adequate supervision.

Recently the Home Office provided guidelines to organisations that care for young people and other vulnerable groups beyond the home. In short, the Government believes all organisations involved with caring for young people or vulnerable adults should have codes of conduct to protect against sexual activity or abuse within relationships of trust. SSG agrees with this statement. The well-being and safety of children and vulnerable adults is of paramount importance in all divisions of SSG within day to day operations and in the selection of management and staff.

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- What is 'radicalisation?' Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social or religious ideals and aspirations that (1) reject or undermine the status quo or (2) reject and/or undermine contemporary ideas and expressions of freedom of choice. For example, radicalism can originate from a broad social consensus against progressive changes in society or from a consensus against lack of changes in society. Radicalisation can be both violent and nonviolent, although most academic literature focuses on radicalisation into violent extremism (RVE).

The focus of concern is specifically around vulnerable people (children and adults) who may be drawn into or coerced to views which fit the definition above.

Code of conduct for staff relating to the safety of participants in SSG

- 1: No member of staff shall engage in sexual contact or in any type of relationship with a child/vulnerable adult other than a properly conducted staff to student relationship. This condition applies regardless of the age of the child even when the child is over the age of consent, i.e. 16 years of age. (It should be noted that a sexual relationship between an adult teacher and a 16 year old student is in breach of professional teaching guidelines. The Government is reviewing whether it should also constitute a criminal offence).
- 2: No member of staff shall engage in conduct towards a child/vulnerable adult which is intended to be oppressive, threatening or manipulative or in any way improper or with a view to causing the child or vulnerable adult physical or mental harm.
- 3: It is unrealistic and inappropriate for SSG to prohibit physical contact between its staff and children/vulnerable adults. Physical contact is an essential part of sports coaching as a means of directing movement, encouraging performance and providing comfort and reassurance. However, staff must bear in mind that even innocent actions can be misconstrued. It is important for staff to be sensitive to a participant's reaction to physical contact and to act appropriately. No child or vulnerable adult should ever be touched on intimate parts of his/her body or in a way that is indecent. Touch must always be related to the needs of the participant rather than to those of the member of staff.
- 4: It is the primary duty of every member of staff to ensure the safety and wellbeing of every child/vulnerable adult in their care or the care of SSG. Each member of staff must ensure that all reasonable steps are taken to minimise risk of harm or injury to any child/vulnerable adult and must abide by the policies, procedures and guidelines set out in this document.
- 5: If, during a child/vulnerable adult's association with SSG, there arises any concern that the child/vulnerable adult has been abused, is being abused or is at risk of being abused in any way, it is the duty of the SSG employee in possession of this information that they take action at once according to the procedure laid down in the Reporting Forms that accompany this document.
- 6: Any incident of alleged inappropriate behaviour towards a child/vulnerable adult by any person employed by SSG shall be subject to an enquiry and report by an expert or experts appointed by the Director(s) of SSG, separate from any criminal investigation. The report of such an enquiry will be presented to the Director(s) of SSG who will decide what further action is necessary and whether there are sufficient grounds to instigate disciplinary proceedings.
- 7: A member of staff who finds him/herself alone with a child/vulnerable adult must exercise particular care. There should be no unease in the mind of either person if such a situation should arise, but physical contact should be avoided whenever possible and the presence of an additional person sought as soon as reasonably practicable. It is better to prevent such situations occurring at all.
- 8: Children/vulnerable adults must at all times be treated with respect in attitude, language and behaviour. Sexual innuendo, whether by word or gesture, is prohibited.

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9: No child/vulnerable adult of any age shall have the responsibility for supervising any other child/vulnerable adult while in the care of SSG.

10: At the conclusion of any session, if a child/vulnerable adult has not been promptly collected by a parent/carer it shall be the sole responsibility of the staff member to remain with that participant until the participant is handed into the care of their parent/carer or other responsible adult designated by the parent/carer.

11: Children/vulnerable adults must not be allowed to leave the premises during sessions unless pre-arranged between the appropriate parent/carer & SSG senior staff.

12: Contact between children/vulnerable adults and SSG staff should take place only in the course of business of SSG. Members of staff are encouraged not to give private tuition to a child/vulnerable adult whom the member of staff has come to know as a direct result of his/her participation at SSG. Should this happen, management and staff must be aware that it takes place outside SSG Child Protection Policy.

13: All chaperones of children/vulnerable adults must be licensed by the Local Authority and subject to Police checks.

14: All persons employed by SSG must read and sign the Safeguarding Children and Young People 'Confidential Declaration', certifying that they understand and are bound by the requirements of the Code of Conduct.

15: Permission must be obtained from the legal guardian before any photographs/visual images are taken. If consent is not provided/obtained then the photographs/visual images cannot be used for any reason.

16: Any photographs or video imagery taken by SSG staff members must only be taken for the use of SSG for assessment, feedback or marketing purposes. These images must not be taken on non-SSG devices. If staff members are using personal cameras/phones/tablets to take photos or record video footage they are breaching policy and putting themselves in a vulnerable position.

17: As stated in the induction policy, all employees must provide all evidence of previous employment and qualifications. A current SSG DBS or annual service registration will need to be submitted for screening before starting employment with SSG. The mandatory CPD and update of certification of safeguarding children/vulnerable adults and child protection must also be completed within the first period of probation.

18: Every employee of SSG Services will undergo compulsory (internal) CPD on PREVENT and anti-radicalisation. Staff involved at various positions with SSG Training will specifically focus on Post-16yrs training through an online video CPD course.

19: SSG staff have a duty to prevent radicalisation at all levels. Acknowledging suspicious actions, behaviours and language used by any persons known to or in contact with SSG Services is imperative, and changes in behaviours, conversations, opinions and language by any individual (relating to terrorism and extremist views) must be reported through the relevant process (see below).

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Procedures to follow when:

- Information is disclosed about sexual abuse of a child/vulnerable adult when the abuse has no connection to SSG.

When information is disclosed by any means that a child/vulnerable adult is being sexually abused and it is unconnected to SSG or its employees, the member of staff should inform the Designated Safeguarding Lead.

N.B. Failure to refer promptly may mean that vital evidence will be lost and result in more suffering to the child/vulnerable adult concerned, as well as potentially leaving other children/vulnerable adults at risk.

It is not for the staff to determine the seriousness of abuse.

1. Information is collated and statements taken from the staff member(s) and (if offered) from the child/vulnerable adult. Only written information will be taken in order to be passed on to the correct authorities.
2. The Designated Safeguarding Lead will then report the alleged concern to the correct local authorities, and if deemed urgent, the police.
3. SSG will then follow the guidance and procedures of the authorities.

- Child or vulnerable adult abuse is suspected

If a member of staff believes that a child/vulnerable adult's behaviour indicates that they may be being abused (physically, verbally, emotionally), then they should report it to the SSG Designated Safeguarding Lead. They will discuss the issue with the local social service team, who are in the best position to judge whether further investigation is required (they may already have information on file concerning this child/vulnerable adult).

1. Information is collated and statements taken from the staff member(s) and (if offered) from the child/vulnerable adult. Only written information will be taken in order to be passed on to the correct authorities.
2. The Designated Safeguarding Lead will then report the alleged concern to the correct local authorities, and if deemed urgent, the police.
3. SSG will then follow the guidance and procedures of the authorities.

- The allegation concerns SSG staff

Once an official investigation has begun with regards to a member of staff inside the organisation, the Director(s) of SSG will make a decision with regards to the level of restriction placed on that member of staff. It may be decided that until the outcome of any enquiry that the person against whom the allegation is made should be restricted from further contact with any other children/vulnerable adults under the care of SSG. Further restrictions may be placed on this individual having contact with other staff members, other than an appointed representative of the organisation.

Failure to abide by these procedures may result in accusations of attempting to pervert the course of justice.

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SSG is aware that we have a responsibility both to the child/vulnerable adult and to the staff member who has been accused. To be accused of abuse or inappropriate behaviour is an extremely traumatic experience for all concerned. SSG will do all it can to support accused staff members pending the outcome of any investigation.

- A PREVENT concern has been raised

Any evidence which is made known to an SSG employee regarding radicalisation of a person known to SSG Services will be reported to the company's Designated Safeguarding Lead. This evidence will be then reviewed and a report will be sent to the relevant police department (01582 473080 prevent@bedfordshire.pnn.police.uk). If the risk is suspected to be imminent then the emergency 999 number will be called.

Recording Information

In all instances, the person to whom the allegations or suspicions are disclosed must make written records as soon as possible. If an employee is the primary source, they must provide their own statement. The exact words of the child or adult giving the information must be recorded and written records must note other relevant details such as decisions taken and the reasons for them, date, time and any observations of the manner or presentation of the child/vulnerable adult which caused concern. The names of the other parties present must be noted. It is not appropriate for a member of SSG staff to investigate an alleged incident themselves. All investigations must be left to Social Services/Police.

On occasion, the evidence needed to prosecute an alleged offender 'beyond reasonable doubt' requires such high standards of proof that a prosecution will not take place and even if prosecution goes ahead, that person may be acquitted. Director(s), their employees and other staff need to be aware that regardless of whether a prosecution takes place at the end of that process, the alleged offender may still be in breach of SSG's own behavioural guidelines and will be assessed.

Confidentiality

SSG Director(s) and staff have a responsibility to share relevant information about the protection of children/vulnerable adults. If a child/vulnerable adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child/vulnerable adult sensitively that he/she has a responsibility to refer cases of alleged abuse to the appropriate agencies for the child/vulnerable adult's own sake. Within that context, the child/vulnerable adult should be assured that the matter will be disclosed only to people who need to know about it. Staff who receive information about children/vulnerable adults and their families in the course of their work should share that information only within an appropriate professional context.

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PARTICIPATION REGISTRATION AND DISMISSAL

Registration of participants

All participants must be registered into the session/project by the Lead Instructor/Project Lead. Registration should be whilst the child, parent/carer and Lead Instructor/Project Lead are present. It is critical that registers are completed fully and clearly to indicate the status of the registered participants within the session/project.

In the event the session/project participants will operate in sub-groups, the participant's name should be added to the sub-group register and given to the Group Leader. The staff member responsible for the group should have the register with them at all times and know which participants they have and how many are in the group in total.

Registers can become a legal document in the event of a formal investigation and need to be completed and managed with the highest level of consideration possible.

Dismissal of participant

Secondary Care - Signing Out

Upon leaving the programme the participants parent/guardian is required to sign the child out of the session on the official SSG dismissal sheet. Its is the responsibility of the Lead Instructor/Project Lead to ensure that parents/guardians complete this document.

Dismissal forms should be returned to the SSG office as part of the end of day documentation process.

Primary Care – Secure Collection Cards

SSG Activities operate a secure collection card process for sessions/projects in which primary care is taken of the participants. Primary care refers to participants who remain on session/project without a parent/guardian/third party responsible adult remaining. The secure collection card process aims to ensure participants can only be dismissed to authorised person/s. The secure collection card process operates as follows:

- A secure collection card will be issued each session. Secure collection cards will be in the folder along with the registers. They will have a specific code printed on them for each session making them completely unique to that session and the project it relates to.
- When participants are registered by the Lead Instructor/Project Lead the parent/guardian will be given a secure collection card with the participants name on (Lead Instructor/Project Lead to write the child's name on the back) – one collection card is to be issued per participant even when two or more participants are registered by the same adult.
- The Lead Instructor/Project Lead must inform the parent/guardian that on collection they must present the card to the Project Lead as proof of authorised pick up. If someone else is picking them up then that person must have the correct secure collection card.
- If the parent registering the child is not able to pass the secure collection card over to another parent/guardian collecting the participant/s, a name and password must be taken and this password to be presented on collection. This process needs to be minimised and the SSG management team must be informed for approval.
- When the participant is collected from the project the parent/guardian must present the correct secure collection card as proof of collection. The Lead Instructor/Project Lead will then take the card in from the parent/guardian, marking it as returned and keep as proof of use.

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- In the event the person collecting the participant does not have the secure collection card, but presents a registered name and password the Lead Instructor/Project Lead must check the adult's identification to confirm they are who they say they are and check the password given is correct. In the event the Lead Instructor/Project Lead is not comfortable with this process for any reason they must contact a member of SSG management.
- If the person collecting the participant does not present the correct secure collection card and has not been named and/or have the password the participant MUST not be released to them under any circumstances and the SSG management should be informed immediately.
- Before leaving the project the parent/guardian must complete the project signing out sheet.

Dismissal forms and returned secure collection cards should be returned to the SSG office as part of the end of day documentation process.

Dismissal forms and secure collection cards can become a legal document in the event of a formal investigation and need to be completed and managed with the highest level of consideration possible.

Non collection of participants

In the event a parent/carer is late for collection of participant/s and they have informed SSG of this lateness the Project Lead and another member of staff will need to remain on site with the participant/s until they are collected. Anything beyond fifteen minutes requires the parent/carer to pay for the additional time and staff members will be advised of additional remuneration if this takes them outside of their agreed working hours.

In the event parent/carers fail to collect and SSG have not been informed, the Project Lead/Lead Instructor needs to inform the SSG office. The office staff will attempt to contact the parent/carer and then advise the project staff of the expected time of arrival of the parent/carer. Anything beyond fifteen minutes requires the parent/carer to pay for the additional time and staff members will be advised of additional remuneration if this takes them outside of their agreed working hours.

In the event the parent/carer cannot be contacted after 15 minutes, the SSG office will call the participant's emergency contact and advise them they need to collect the participant/s. In the event the emergency contact cannot be reached, the SSG office will continue to attempt to speak to both parties up to the thirty minutes after the collection time. If neither parent/carer or emergency contact is reached, the SSG office will implement the 'non-collected participant process' which requires them to contact the local authority and/or the local police for support.

Walking/cycling home alone

There are no laws regarding age or distance of walking/cycling home from a place of care. A families' guide to the law states:

"There is no law prohibiting children from being out on their own at any age. It is a matter of judgement for parents to decide when children can play out on their own, walk to the shops or school."

SSG Activities is responsible for the welfare of participants they work with and therefore have to consider what we believe is good practice in ensuring the safety of these participants. We also have an obligation to alert relevant authorities should we believe a participant's welfare is at risk.

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SSG Activities operates a policy that no participant under the age of twelve years old should walk/cycle home on their own. SSG will require parents/guardians to complete a written consent/permission form if they require a participant to be permitted to leave a session/project on their own. A participant will be prevented from walking home unless this permission has been given in writing. A participant over the age of twelve is not permitted to accompany home other participants under the age of twelve regardless of parents/guardians' wishes or the relationship between participants.

When SSG Activities operate sessions/projects within a school or other care organisation setting the above policy must be abided by. If the school or other setting wishes for the walking/cycling home process to be different they will need to provide their own staff member to take responsibility from the SSG staff member and undertake a dismissal of participants under their own organisational policy. If a school/organisation does not operate a walking home policy, SSG will not facilitate one.

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MISSING PARTICIPANT PROCESS

A person could be considered 'missing' if they disappear during a session and are not present at the end of the session. If they are not there at the end of the session or disappear during a session, depending on the system in the setting the following actions should be taken:

- Check registers to ensure that they were present initially and had not already been marked as absent.
- Check with all other staff members and persons to ensure that they were not dismissed to a parent/guardian during the session.
- Check with all members of staff and persons to determine when the missing person was last seen.
- Conduct a thorough and organised search of the building and surrounding area. Search systematically. Gather the remaining children into one group and a member/s of staff carry out an activity such as story time. Other staff members are to search the building and local area.

If still unable to locate the person

- Inform an SSG Operations Manager
- Undertake a full session/project site lock down. All exits from the premises should be locked in a way which makes it impossible for a child to leave unobserved/unattended, while still allowing rapid exit for the whole group in case of an emergency. Participants should not be made aware of the situation or alarmed in any way.
- Contact the SSG office who will contact the parent/guardian, or other emergency contact of the person. Explain the situation and check that they are not already aware of the whereabouts of the participant.
- If there are enough staff members available, one member of staff is to walk the journey to the person's home
- If the above steps do not locate the person, notify the police of a missing person
- Complete an incident form and keep this on file

The best chance of finding a lost participant safe is if all the steps above are done quickly, calmly and thoroughly.

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SICK PARTICIPANT PROCESS

Our policy for the exclusion of ill or infectious children is as follows:

- We do not provide care for participants who are unwell, have a temperature, or sickness and diarrhoea, or who have an infectious disease.
- If a participant has suffered from any diarrhoea and/or vomiting, they must not attend the session/project until they have been symptom free for 48 hours.
- If a participant becomes ill during a session, every attempt will be made to contact one of the people listed on the consent form, to arrange collection of the sick participant. The participant will be cared for until collected.
- If a participant has a communicable disease, (other than HIV or Hepatitis B) they should not attend the setting until they are no longer infectious.
- Participants with head lice are not excluded, but **must** be treated to remedy the condition and SSG Activities must be informed.
- Participants and families are not excluded because of HIV.

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PARTICIPANT INFORMATION CONFIDENTIALITY

It is our intention to respect the privacy of children and their parents/carers, while ensuring that they access high quality care and education. An employee/volunteer of the setting may in the course of his/her duties gain knowledge of or have access to personal information relating to participant and families and/or other members of staff. It is a condition of employment that all staff/volunteers understand the importance of respecting this information in a discreet and confidential manner. We aim to ensure that all parents/carers can share their information with confidence that it will only be used to enhance the welfare of the participants.

To ensure that all those participating and working in the setting can do so with confidence, we respect confidentiality in the following ways:

- Parents/carers have access to the files and records of their own child/ren but do not have access to information about any other participants.
- Staff will not discuss personal information given by parents/guardians with other members of staff, except where it affects planning for the participant's needs. Staff induction includes an awareness of the importance of confidentiality in the role of the key person.
- If staff talk to parents/guardians about any causes for concern, e.g. unsociable behaviour, this should be done out of hearing of the participant in question, other participants and their parents/carers.
- Any concerns/evidence relating to a participant's personal safety are kept in a secure, confidential file and are shared with as few people as possible on a "need-to-know" basis.
- Personal information about participants, families and staff is kept securely in a lockable file whilst remaining as accessible as possible if needed.
- Medical information held on file may be made available to the General Practitioner or hospital Doctor in the case of an emergency.
- If telephone requests are made for information the recipient should take the name, telephone number and agency and make a return call with such information as may be given, subject to this or any other relevant procedural note.
- In certain circumstances where there are safeguarding concerns for a participant, information may be passed to the relevant authorities.
- Issues to do with the employment of staff, whether paid or unpaid, remain confidential to the people directly involved with making personnel decisions.
- When students on recognised qualifications and training courses are observing in the setting, they are advised of our confidentiality policy and required to respect it.
- Written material about participant and families should be stored for 7 years and then should be shredded before disposal.
- Any breach of confidentiality could have serious consequences for the person concerned. Confidentiality must be emphasised to all staff/volunteers upon employment. A confidentiality agreement should be signed and dated by each individual staff member/volunteer to be retained with their application and acceptance details.

All the undertakings above are crucial to the foremost commitment of the setting, which is to the safety and well-being of the participant. Please see also our policy on Safeguarding Children.