

SAFEGUARDING POLICY

1. Introduction

Breck Foundation is a charity that empowers children and young people to keep safe online.

We are committed to safeguarding the well-being of all individuals who come into contact with our organisation and its activities. We actively work to safeguard and promote the welfare of all children and young people, and all staff and/or volunteers who have contact with children and young people have safeguarding training.

Breck Foundation aims to abide by the Charity Commission's guidance on safeguarding, which notes that "safeguarding goes beyond preventing physical abuse, and includes protecting people from harm generally, including neglect, emotional abuse, exploitation, radicalisation, and the consequences of the misuse of personal data."

2. Policy Statement

Breck Foundation believes that a child or young person should never experience abuse or grooming of any kind. In educating and empowering children and young people to help them keep safe online, we have a responsibility to promote the welfare of all children and young people.

Breck Foundation commits to:

- Protecting children and young people who receive any of Breck Foundation's services. This includes the children of adults who access our services.
- Ensure that background Disclosure and Barring Service Checks are carried out for all new staff and volunteers, and that these are refreshed on a regular basis.
- Provide staff and volunteers with the overarching principles that guide Breck Foundation's approach to safeguarding and child protection.
- Provide the requisite general safeguarding training to all staff or volunteers who come into contact with children and/or young people, as well as providing this training to trustees. This training should be refreshed on an annual basis.

3. Personal Associated Policies and Procedures

This policy statement and procedures should be read alongside our organisational policies, procedures, guidance and other related documents, including:

- Staff and volunteer code of conduct
- Induction policy
- Fundraising Policy and procedures
- Complaints
- Whistleblowing
- Managing allegations against staff and volunteers
- Data protection

4. Personal Responsibility

Safeguarding is everyone's responsibility: staff, trustees, volunteers, partners, all have duties in relation to safeguarding. Therefore, they should know what action to take if an individual is at risk or suspected to be at risk, to prevent and report harm to them, including physical, sexual, or emotional abuse. All Breck Foundation staff are required to take consider welfare of vulnerable individuals as being paramount.

It is essential that all trustees, staff and volunteers, partners and any others carrying out frontline work on behalf of Breck Foundation:

- Ensure that they do not have unsupervised access to children or vulnerable adults during the course of working for Breck Foundation;
- Consider any and all potential safeguarding issues that may arise, when planning school visits and other activities; and
- Report any safeguarding concerns promptly to the CEO or in the CEO's absence, to the trustee responsible for safeguarding or the Chair of trustees. If none of these individuals are reachable, they should report such concerns to any member of the board of trustees.
- If they encounter an urgent safeguarding concern, then they must report it to the police immediately.

5. Scope

This policy applies to all staff and associates:

"Staff" includes:

- All paid staff members, including senior managers, sessional workers, agency staff, students or anyone working on behalf of Breck Foundation.
- All volunteers and interns.

"Associates" includes:

- All contractors, for example consultants.
- All Board of Trustees members.
- All partners, including local community-based partners.
- Guests and visitors.

The policy applies to anyone who works or has contact with Breck Foundation, who is a child, a young person, or Adult at Risk.

This policy is reviewed, endorsed and approved by the Board of Trustees annually, and when there are key changes in legislation.

6. Purpose

The purpose of this policy is to provide staff and associates with the overarching principles that guide Breck Foundation's approach to safeguarding. It also outlines the actions that staff and associates are required to take when dealing with safeguarding concerns.

7. Policy Principles

This policy has been drawn up based on law and guidance that seeks to protect children, namely:

- Children Act 1989
- United Nations Convention on the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998

- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding 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 safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015.

Breck Foundation is committed to:

- Safeguarding the wellbeing of beneficiaries, staff, volunteers, and all those connected with the activities of Breck Foundation, and ensuring they have equal rights to protection from harm;
- Ensuring that all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse;
- A duty of care to children, vulnerable adults with whom they work, are in contact with, or who are affected by work and operations;
- Taking all actions on safeguarding in the best interests of the child or vulnerable adult, which are paramount as enshrined in the Children Act 1989;
- Recognising that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues; and
- Working in partnership with children, young people, schools, safeguarding leads, parents, carers and other agencies is essential in promoting young people's welfare.

Breck Foundation will seek to keep children and young people safe by:

- Educating and empowering them, sharing our safety messages about the online world;
- appointing a Designated Safeguarding Officer (DSO) for children and young people, as well as a deputy officer;
- adopting child protection and safeguarding practices through procedures and a code of conduct for staff and volunteers, as well as regular safeguarding training for staff, volunteers and trustees;
- developing and implementing an effective e-safety policy and related procedures;
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures;
- recruiting staff, volunteers and trustees safely, ensuring all necessary DBS checks are made on all new recruits, and that these are refreshed on a regular basis;
- recording and storing information professionally and securely, sharing information about safeguarding and good practice with children, their families, schools and safeguarding leads, staff and volunteers via leaflets, social media, posters, and one-to-one discussions;
- using our safeguarding procedures to share concerns and relevant information with schools and agencies who need to know, and involving children, young people, parents, families and carers appropriately;

- creating and maintaining an anti-grooming environment, ensuring that we have a policy and procedure to help us deal effectively with any abuse or bullying that does arise; and
- ensuring that we provide a safe physical environment for children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

8. Definitions and Terms

8.1. Safeguarding: Safeguarding is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children and vulnerable adults, and do not expose children and vulnerable adults to the risk of harm and abuse, and that any concerns the organisation has about vulnerable adults and children's safety within the communities in which they work, are reported to the appropriate authorities or handled appropriately.

8.2. Child: Any person below the age of 18, regardless of national laws or cultural practices which may stipulate a younger age.

8.3. Vulnerable Adult/Adult at risk: Any person aged 18 or over, and if:

- A. The adult has particular care, support or special needs and as a result abuse occurs when a vulnerable adult/adult at risk is mistreated, neglected or harmed by another person who holds a position of trust; and/or
- B. The adult is in a relationship (work or social) or in contact with another adult who seeks to misuse their position of authority or trust to control, coerce, manipulate or dominate them.

8.4. Abuse: Abuse is a form of maltreatment of a child by inflicting harm, or by failing to act to prevent harm. In order to safeguard all those in our community, we adhere to the principles of the UN Convention on the Rights of the Child (1989), and have as a definition of abuse, Article 19 which states:

- Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.
- Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.

Also, for adults the UN Universal Declaration of Human Rights with reference to Article 5 which states:

- No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Abuse may include, but is not exclusive to:

Physical abuse: actual or potential physical harm perpetrated by another person, adult or child. it may involve hitting, shaking, poisoning, drowning and burning. Physical

harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

Emotional abuse: persistent emotional maltreatment that impacts mental wellbeing and mental health. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

Commercial exploitation: exploiting a child or a vulnerable adult in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, forced labour. A child is any person under the age of 18 years.

Neglect and negligent treatment: persistent failure to meet a child's basic physical and /or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.

Sexual abuse: forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.

Sexual exploitation: a form of sexual abuse that involves children or vulnerable adults being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, vulnerable adults or any beneficiary, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. Sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity.

It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men or women.

Sexual Harassment: Unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature that tends to create a hostile or offensive work environment. While such conduct can be harassment of women by men, many laws around the world which prohibit sexual harassment and recognize that both men and women may be harassers or victims of sexual harassment.

7. Prevention

Breck Foundation is committed to safeguard children and vulnerable adults from abuse. Protecting the rights of children will be addressed through the following steps:

A. Risk assessment/risk mitigation

A risk assessment of all activities will be conducted, and risk mitigation strategies will be developed and incorporated into all activities which involve or impact children.

B. Safe recruitment

Breck Foundation applies the highest standards in its recruitment and vetting policies. Where appropriate, candidates are checked for their suitability for working with children and their understanding of safeguarding.

Protection checks, such as disclosure of previous convictions or police checks forms an important part of Breck Foundation recruitment policy and covers all individuals who will have any contact with children or vulnerable adults. If police checks are impossible, other checks are put into practice and noted. Checking evidence of identity and the authenticity of qualifications, requesting self-declarations about previous convictions, and a minimum requirement of at least two references are carried out in all cases.

C. Code of conduct

Please see Annex A, for our Code of Conduct.

D. Training

- All staff and associates receive safeguarding training to help them understand why it is necessary to safeguard and protect children and to be fully aware of the procedure for reporting concerns.
- Staff will receive a short induction on safeguarding at the time of their engagement with Breck Foundation. Staff with responsibilities relating to safeguarding will be provided with a more in-depth training. [Cambridgeshire & Peterborough Safeguarding Partnership Training](#) and [NSPCC E-learning](#) are recommended.
- Associates will be briefed on safeguarding and their responsibilities under the policy upon engagement with Breck Foundation.
- Children and families will be informed on Breck Foundation's commitment to safeguarding and what to do if they have concerns about a child.
- All staff and children are aware of the designated Safeguarding Officer (CSO) who is responsible for receiving reports of concerns and advising on assessing and mitigating risk in line with Breck Foundation's policy and procedures.

E. Communications – use of images and children's information

Under Data Protection Policy, images or video recordings of children must be kept securely. Electronic images should be kept in a protected folder with restricted access. Images should not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

8. Reporting/responding to concerns

We recognise that:

- The welfare of children is paramount in all the work we do and in all the decisions we take
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

We will seek to keep children and adults safe by:

- Valuing, listening to and respecting them

- Following appropriate staff recruitment practices
- Appointing a nominated safeguarding lead, a deputy and a lead trustee/board member for safeguarding
- Adopting safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Setting clear expectations for thirds party providers or consultants and our supporters on their role and responsibility in safeguarding children and vulnerable adults.
- 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 including DBS where required
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the [Information Commissioner's Office](#)]
- Offering signposting to advice and guidance when it is appropriate to do so
- Using our safeguarding 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

Our procedures are underpinned by these five principles drawn from safeguarding good practice:

1. All those working with children and vulnerable adults must promote their welfare, health, wellbeing and development and take every reasonable precaution to protect them
2. We recognise that children, young people and adults can be victims of emotional abuse, neglect, physical abuse, sexual abuse and bullying.
3. When we receive information about potential harm to any child, young person or adult who comes into contact with Breck Foundation we act on those concerns.
4. All employees and volunteers have a role to play in identifying concerns, sharing information and taking prompt action.
5. Breck Foundation staff do not have a role in investigating concerns of harm, we act on concerns and pass to the relevant agencies (Police, Local Authority Social Care).

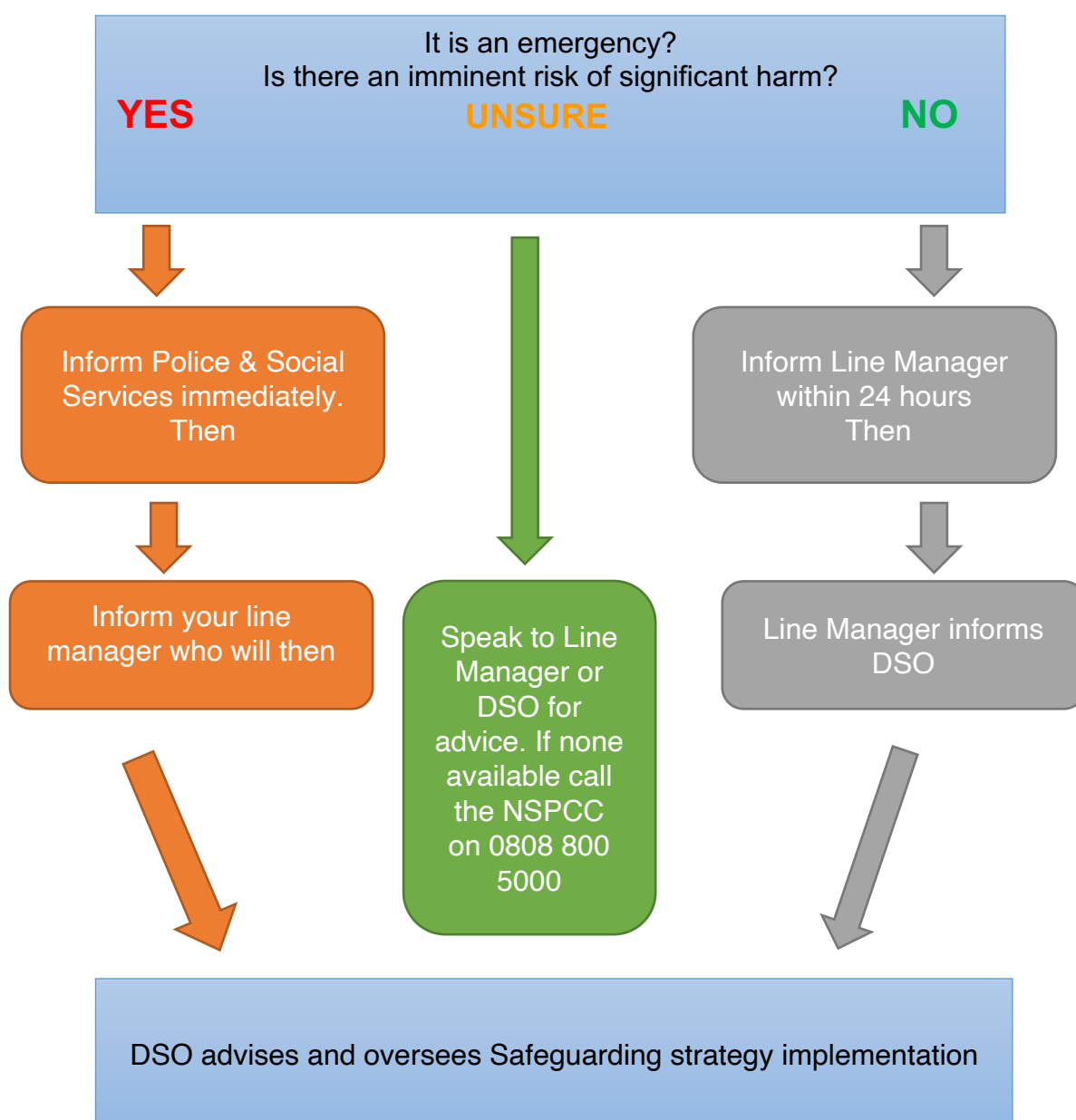
These procedures detail what to do if you are concerned about a child or a vulnerable adult. You may have received a direct or indirect disclosure of risk of harm and it is vital we act on these concerns using the 4 R's method:

1. **Reassurance:** reassure the child / young person / adult that it was right that they disclosed the abuse.
2. **Respond:** tell them clearly what you are planning to do. For children: you do not need to seek consent to report and cannot assure confidentiality where a child is at risk. If the risk of harm is involving parents / carers you should not discuss with them. With Vulnerable adults: seek consent from the person concerned. If you feel that they do not have capacity to consent, you can act without consent but you must log your decision. Tell the person involved what you are going to do about the concern and note any views that they may have regarding how they wish the matter to be dealt with.
3. **Refer:** inform the CEO of the situation (see flowchart)
4. **Record:** make detail notes of the abuse and the actions taken. Use the form detailed in the procedures.

NOTE: If someone is injured or at immediate risk, take immediate action. Seek help by dialling 999 for police or ambulance.

The CEO will store securely any records of safeguarding disclosures and referrals, in line with our guidance on data protection and GDPR. The CEO will ensure that referrals are received and take responsibility for any follow up actions agreed with referring agencies.

The flowchart details how the process for Breck Foundation staff who have a concern about an adult or child escalate their concern:



9. Working in Schools

When a Breck Foundation staff or associate is carrying out any work within schools, they must follow the school's safeguarding policy. The staff or associate must in advance confirm who is the safeguarding lead for the school and subsequently run any

disclosures through them using the school's processes. If the disclosure relates to a staff member in the school, then the Breck Foundation staff or associate must make the referral direct. Any safeguarding incident, whether reported through the school processes or direct, must be recorded by Breck Foundation staff and flagged with the DSL or the Deputy DSL. Where the school's processes have been followed, the DSL or Deputy DSL should follow up with the school in writing to confirm action has been taken.

10. Monitoring and review

Safeguarding is incorporated into Breck Foundation's risk register and reporting processes. Senior management and the Board of Trustees will regularly review the risk register to ensure that safeguarding measures are in place and effective.

This policy will be reviewed annually or when it is shown necessary that additional issues need to be identified and addressed through this policy.

Annex A: Code of Conduct for Staff and Volunteers

I, _____, acknowledge that I have read and understood the Breck Foundation’s Safeguarding Policy, and agree that during my association with Breck Foundation, I must:

- Treat children with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate. As with the previous point, this applies to all communications, including through digital and social media.
- Not engage children under the age of 18 in any form of sexual activity, including paying for sexual services or acts.
- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
- Use any computers, mobile phones, video cameras, cameras or social media appropriately, and never exploit or harass children or access child exploitation material through any medium.
- Not use physical punishment on children.
- Not hire children for domestic or other labour, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- Comply with all relevant local legislation, including labour laws in relation to child labour.
- Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures.
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with Breck Foundation that relate to child exploitation and abuse.

I understand that the onus is on me, as a person associated with Breck Foundation, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

Signature:

Breaches of this code

This code of conduct has been drawn up to provide a source of guidance to Breck Foundation's staff and associates. It is not a contractual document and can be amended at any time by Breck Foundation's senior management. All staff and associates must comply with both the provisions of this code and the Foundation's policies and procedures. Breaches of this code will be taken seriously and may result in disciplinary action up to and including dismissal.

Contact details

Bourne House
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Whyteleafe
Surrey
CR3 0BL
01883 621102
admin@breckfoundation.org

Duty Designated Safeguarding Officer

Sarah Smith
Sarah.smith@breckfoundation.org

Deputy Duty Safeguarding Officer

Michael Buraimoh
michael.buraimoh@breckfoundation.org

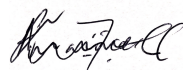
CEOP

www.ceop.police.uk
NSPCC Helpline
0808 800 5000

We are committed to reviewing our policy and good practice annually – Records will be available.

This policy was last reviewed on April 13, 2023.

Signed:



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Michael Buraimoh, Chief Executive Officer

Appendix B: Recording Form

Safeguarding Recording Form: Breck Foundation : CONFIDENTIAL

Name (s) of Child/Young Person/Vulnerable Adult:

Address:

Date of Birth :

Name of Person Reporting Incident:

Date of incident:

Sequence of Events/Actual Words Used/Observations:

Action Taken (including person(s) contacted)

DSO Response:

Advice given to reporting staff member:

Action taken (Referral / No action / Escalation):

Notes from agency strategy discussion:

Learnings and recommendations for Breck Foundation

Charity Commission Serious Incident (Yes / No)