

## POLICIES AND PROCEDURES MANUAL - ONWARDS AND UPWARDS

### SAFEGUARDING POLICY

#### 1. Introduction and Policy Statement

Onwards & Upwards are committed to protecting all children and adults against all forms of abuse and we expect everyone who works in our organisation, and our subsidiary businesses, to share this commitment. This includes all employees at XO Bikes, and all additional XO ventures.

We recognise that:

- The safety and welfare of adults and children are paramount
- All adults and children have the right to equal protection from all types of harm or abuse

This policy aims to protect adults and children, by ensuring that all employees are aware of the threats to their safety and well-being. The policy will be reviewed regularly, in line with our policy review schedule and, at the very least, annually.

This policy sets how the organisation will manage matters arising during employment where it is believed that vulnerable groups could be, or have been, placed at risk.

This policy explains the responsibilities of staff in relation to the safeguarding of vulnerable groups and the procedure that should be followed when reporting an allegation of abuse.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

#### 2. Who is Covered by this Policy?

This policy applies to those working at all levels and grades, including senior managers, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff, and volunteers (collectively referred to as staff in this policy).

It is their responsibility to read and understand this policy and how it applies to them in their role within the Company. Each employee will be made aware of where our policies are kept when starting at the company. In addition, Line managers are responsible for ensuring that anyone working for or on behalf of the Company, is aware of this policy, where it is kept and that they have access to it.

Employees will be asked to confirm that they are aware of where policies are kept and to confirm that they have read, understood and commit to abiding by the policies, and specifically this safeguarding policy.

The policy specifically covers all who work in a regulated activity with children and/or adults, and this policy defines a child as anyone under the age of 18 years.

### 3. Personnel Responsible for Implementation of this Policy

The Designated Safeguarding Lead (DSL) has overall responsibility for the operation of this policy. They will ensure that adequate resources are available for the effective implementation of this Policy.

It is the responsibility of everyone working for or on behalf of the organisation to report any allegations of abuse. Any safeguarding concerns should be reported to your manager or the DSL.

It is the role of the DSL to ensure their knowledge of all relevant safeguarding guidance is kept up to date, and that company policies on all aspects of safeguarding are updated on a regular basis.

#### **The DSL can respond to questions relating to:**

- Safeguarding expectations of all staff
- Best practice with regard to safeguarding
- Disclosure and Barring Service checks
- Safer Recruitment

The DSL overall for Onwards and Upwards is the Operations Director (Maria Harcourt) Maria will be responsible for all safeguarding concerns in the first instance. Any concerns relating to Gang4Good will be shared with deputy Rosie Gillum. Any concerns relating to Onwards & Upwards Trainees will be shared with deputy Sarah Smith.

The appointed Safeguarding Trustee Lead is Zenna Hopson.

### 4. Aims of the Policy:

- to raise awareness among all employees of the need to safeguard adults and children;
- to ensure employees are aware of their responsibilities in identifying and reporting possible cases of abuse;
- to provide a clear process for reporting concerns about children/adults who may be at risk of harm;
- to establish and sustain good levels of communication between employees, with the DSL within the places in which we work;
- to ensure all employees are aware of and follow the company internal reporting process (Appendix A), when they have communicated concerns in an external environment to the DSL;
- to ensure that all employees who, through their role, have unsupervised access to adults and children, receive regular training updates as new safeguarding issues and guidance arise;
- to link to the requirements within the recruitment policy.

### 5. Work that Becomes Regulated

If work either becomes a regulated activity, or if you are asked to perform work that is a regulated activity, we may require you to provide an Enhanced Disclosure with a relevant barred list check from the Disclosure and Barring Service.

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The purpose of this check is to confirm that you are suitable to perform this work and are not barred from doing so. We are aware that the majority of our staff will have a criminal record, and we were founded to support and find opportunities for people that have a criminal record. It is very important that in light of this we are presenting suitable opportunities to ensure that we meet our safeguarding responsibilities.

If you refuse to undertake these checks, we will investigate the circumstances further and will fully consider the effect of this on your continued employment.

If a disclosure confirms that you have a relevant criminal conviction or have been placed on a relevant barred list, we will work with you to try to find a solution that provides you with an opportunity whilst maintaining our safeguarding responsibilities.

Where you are not legally permitted to perform a regulated activity, or where we otherwise have reason to believe that this will be inappropriate, we may consider if there are any other non-regulated activities in which you can be employed. We reserve the right to dismiss you where continued employment cannot be supported, but will do all that we can to find you a suitable opportunity whilst delivering our safeguarding responsibilities.

#### **6. If you are Added to a Barred list**

If you are added to a barred list during employment, it may be that we cannot legally allow you to continue to engage in a regulated activity. Where you are not permitted to perform a regulated activity, we may investigate if there are any other nonregulated activities in which you can be employed. We reserve the right to dismiss you where continued employment cannot be supported, but we will do all that we can to find you a suitable opportunity whilst delivering our safeguarding responsibilities.

#### **7. Confidentiality**

The Company recognises that all matters relating to adults and children's welfare, and safeguarding, are confidential.

Our employees will only disclose information about an individual to others on a 'need to know' basis and taking into account statutory requirements, including under the Data Protection Act 2018.

If someone discloses to you that they are being abused, upon receiving the information you should reassure them that they were right to tell you, that they are not to blame, and that you take seriously what they have said. Do not promise confidentiality. Inform the person what you will do next and make a full and written record of what has been said as soon as possible.

If you suspect that somebody may be at risk from others or themselves, report it immediately – do not delay.

#### **8. Reporting Allegations of Abuse**

All staff, and any volunteers engaged on behalf of the Organisation, must be vigilant at all times to risks of abuse towards adults and/or children. This may include behaviour from participants, visitors, staff members, health and social care practitioners, volunteers, and those representing partner organisations.

Abuse is a violation of an individual's civil or human rights by another person. This can be a single act or multiple acts, and it may occur in a variety of ways. Abuse of an individual may be verbal, physical, or psychological. It may occur from a deliberate act or a failure to act. Abuse may also occur when an individual is persuaded to do something that he or she has not consented to, or is unable to consent to, or where the individual is exploited by another person.

**The main forms of abuse (although this list is not exhaustive):**

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

If you believe or suspect that a child and /or vulnerable adult has been subjected to abuse, you must refer the matter to your line manager or the Safeguarding Officer (SO) immediately. We will consider all allegations of abuse seriously.

When reporting an allegation of abuse, it is important to provide as much detail as possible, including the name of the person who has been subjected to abuse, the nature of the abuse, the dates and times of any specific incidents and details of any evidence or other witnesses that may be available.

If you are working within the community, then information should be passed onto a caseworker who can then liaise with the appropriate bodies.

## **9. Investigation**

We will investigate all complaints of alleged or suspected abuse fully, in accordance with the disciplinary procedure. We may be required to refer information to the Disclosure and Barring Service and may also consider it necessary to inform the Police of allegations under investigation.

## **10. Allegations Against Employees**

We reserve the right to suspend you on full pay pending investigation into an allegation of abuse and pending any resulting disciplinary proceedings.

## **11. Disciplinary Action**

Where we have reason to believe that an allegation of abuse has foundation, we will arrange a disciplinary meeting with the individual. This could result in a decision to take disciplinary action against the employee, up to and including dismissal.

## 12. Whistleblowing

Employees who have safeguarding concerns relating to the conduct and or behaviour of any other employee must share those concerns. The Whistleblowing Policy exists to protect employees and promote an honest and open culture where safeguarding is paramount.

## 13. Prevent

Employees have a duty, under the Counter Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. It is essential that staff are aware of indicators of children and adult's potential vulnerability. The risk of being radicalised is a vulnerability in the same way as all other aspects of safeguarding.

## 14. Duty to Refer Information

The Organisation will discuss any safeguarding concerns with the relevant safeguarding authority and would encourage any staff member with concerns to do the same. Please remember that it is not for you to decide a child or vulnerable adult is or may be at risk of harm or abuse, but it is for you to refer that information to the professional bodies that can assess risk and act as required.

We are legally required to refer certain information about an individual to the Disclosure and Barring Service.

This duty applies where:

- (a) you are dismissed because you have harmed or may harm a child or vulnerable adult.
- (b) we have suspended you and have reason to believe that you have engaged in relevant conduct or have harmed or may harm a child or adult or have received a caution or a conviction for a relevant criminal offence.
- (c) you resign in circumstances where there is a suspicion that you harmed, or may harm, a child or vulnerable adult. This may, for example, arise where an employee resigns before disciplinary action is taken by the organisation.

## Reporting a Safeguarding Concern

All employees working on behalf of Onwards and Upwards have access to a form on Monday, which they must complete if they have witnessed an incident, detailing as much information as possible. Any additional information can be given in person, or over email, to either Maria Harcourt, Rosie Gillum, or Sarah Smith.

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Your concern will be logged and escalated as appropriate.

You may not receive an update to your safeguarding concern if it is not appropriate to do so.

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