



Safeguarding Policy

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Safeguarding Policy

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SAFEGUARDING POLICY

1. Introduction

1.1. Safeguarding is about protecting children, young people and adults at risk from abuse or neglect. This policy provides a framework for the work Unite Foundation is carrying out to:

- identify, escalate, report, and manage cases of potential or actual cases of abuse or neglect,
- comply fully with our legal responsibilities – in relation both to safeguarding legislation specifically and to our broader duty of care,
- be proactive when it comes to reflecting safeguarding considerations in our activities as an organization for both children and adults-at-risk

1.2. The Unite Foundation believes all individuals have a right to learn, live and develop within a safe environment and is committed to protecting children and adults-at-risk from significant harm. The Unite Foundation is not however ‘in loco parentis’ (in the place of the parent) and cannot accept the responsibilities of a guardian to any member of its community.

1.3. The Unite Foundation also recognises its responsibilities to protect staff, students, Board members, contractors, consultants and volunteers against unfounded allegations of abuse.

2. Scope

The scope of this policy covers all of our activities which impact on or involve children (including young people) and/or adults-at-risk as applicants, scholarship beneficiaries or students accessing other Foundation charitable activity. Cases may also involve other third parties (either as someone potentially responsible for the abuse/neglect of a UF Student Contact or as someone at risk themselves). There are separate legislative frameworks relating to children and adults which are listed in Appendix 1.

3. Definitions

The following definitions apply to all Unite Foundation activities in all locations in which we operate:

- **Safeguarding** – the process of protecting children and adults-at-risk from abuse or neglect, and, thereby, preventing impairment of their health and development and ensuring they are able to live in circumstances consistent with the provision of safe and effective care.
- **Child (or Children)** – someone who has not, or people who have not, yet reached their 18th birthday. In England, Wales and Northern Ireland, a child is defined as anyone under the age of 18. In Scotland, the definition of a child varies in different legal contexts (most commonly referring to under 16 year olds); however, given that ‘young people’ in Scotland between the ages of 16 and 18 can still be subject to a supervision requirement by a Children’s Hearing, this policy defines the term children to cover as all people under the age of 18. The fact that a child is living independently or is in further or higher education, does not change their status under this policy.

- **Adult-at-risk¹** – someone who is aged 18 or over and who is experiencing, or at risk of, abuse, neglect or significant harm. Often an adult-at-risk will be unable to protect themselves from harm or exploitation, or safeguard their own wellbeing, property, rights or other interests.
- **Abuse** – the maltreatment of an individual by inflicting harm on them, or by failing to act to prevent them from being harmed. Abuse can be perpetrated by adults and/or children.
- **Neglect / Self-Neglect** – the persisting failure to meet an individual's basic physical or psychological needs. This includes failure to provide access to appropriate healthcare, support, or educational services; the withholding of the necessities of life, such as medication, nutrition, and heating.
- **Radicalisation** – defined in the Prevent Duty Guidance as the 'process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups' (Prevent Strategy, 2011). This definition of 'radicalisation' is included here as, when it is carried out by a third party over someone, it is a specific form of harm or abuse that falls within the scope of this policy, and also because children and adults at risk may be more likely to be drawn into radicalisation by others.

¹ The term 'adult at risk' is used in this policy in place of 'vulnerable adult'. We use 'adult at risk' as a replacement for 'vulnerable adult', as 'adult at risk' is used throughout existing government guidance.

4. Policy

- 4.1. This document provides a framework for Unite Foundation's engagement with safeguarding issues relating to, or involving, student contacts – including specifically the reporting/escalation, referral, case-management, and recording of potential safeguarding issues.
- 4.2. Unite Foundation's safeguarding arrangements are underpinned by the following key principles:
 - All individuals, including children and adults at risk, have a right to be protected from abuse and neglect.
 - The welfare of the child or adult at risk is the paramount consideration.
 - Our duty of care means we have to be proactive in terms of how we build safeguarding protections into key aspects of our work and also respond effectively when we become aware through our work of someone experiencing, or at risk of, abuse or neglect – whether that person is a student, a staff member, someone else connected with our operations, or a third party.
 - Safeguarding is everyone's responsibility. All individuals acting on behalf of our organisation are responsible for being alert to, and acting upon, potential safeguarding issues in accordance with this policy.
 - We will establish clear roles and responsibilities for the prevention of abuse and neglect and the reporting of safeguarding-related concerns.
 - We will always strive to support and empower people to make their own decisions and give informed consent in relation to our referral of cases to external agencies.
 - At the same time, we know that there can be circumstances in which we may need to share personal information with external agencies about a safeguarding concern without the knowledge and/or consent of the individuals affected in order to exercise our duty of care; in these rare cases, we do this knowing that data protection legislation allows for this.
 - In the area of safeguarding, as in many other areas of our work, we need to work in partnership with universities, Unite Students, external agencies and others.

5. General good practice for staff

- 5.1. All members of Unite Foundation staff share a responsibility for establishing a safe and secure environment for all its members.
- 5.2. Safeguarding over-rides confidentiality, data protection, internal hierarchies and other objectives. Staff should not collude with a parent, a child, or another staff member to keep concerns secret in areas of safeguarding.
- 5.3. Any member of staff whose normal duties will include regulated activity will be vetted by a DBS check before taking up the role and are obliged to notify the Unite Foundation of any subsequent criminal convictions that may impact upon their future employment.
- 5.4. The Unite Foundation considers that intimate or sexual relationships between staff and students under the age of 18 or who are adults at risk to be an abuse of trust, and notes that such relationships may also constitute a criminal offence.
- 5.5. One-to-one meetings with students under the age of 18 or adults at risk, or other meetings outside the normal living / office environment, should be conducted with due regard to the potential sensitivity of the situation. Ideally meetings should be conducted in an area where at least one other member of staff is present, including online meetings and interviews.

- 5.6. Unnecessary physical contact with children or adults at risk should be avoided. Whilst these gestures may be well intentioned, such acts are sometimes not welcomed by the recipient or misinterpreted by third parties.
- 5.7. Staff administering first aid should ensure, wherever possible, that another member of staff is present if they are in any doubt as to whether necessary physical contact could be misconstrued. However, staff should not hesitate to issue first aid in an emergency.
- 5.8. Care should be exercised in the use of language. For example, unnecessary comments which have or could be interpreted as having an inappropriate sexual connotation should be avoided.
- 5.9. The personal telephone number, personal email or home address of any staff member should not be given to children or students who are adults at risk.
- 5.10. In situations where it is necessary for a trained staff member to restrain a person in order to prevent injury or damage, only the minimum force necessary must be used and any action taken must be to restrain only, and only for as long as is necessary to prevent harm. Anyone not trained should be assisted by an appropriately trained member of staff.
- 5.11. There will be occasions when children and adults at risk are placed in settings outside of their normal place of study (e.g. a placement, field trip, summer school, or taster event). Organisers must ensure that appropriate DBS checks have been made, risk assessments are conducted, and procedures are in place to protect children and adults at risk from harm.
- 5.12. In the case of any child or adult at risk making a disclosure of abuse or where there is cause for concern, explain to the student that this information will have to be reported. Do not attempt to resolve any concerns alone and report all allegations or suspicions of abuse.
- 5.13. If a member of staff feels that they or other members of the Unite Foundation may be at risk from being the subject of or exposed to unwarranted accusations in connection with children or adults at risk, they should alert the Designated Safeguarding Officer, Laura Bowman, through info@unitefoundation.org.uk.
- 5.14. There will be a monitored email address, reports to which will, if necessary, result in the invocation of this policy and procedure. Any individual can contact info@unitefoundation.org.uk to raise a safeguarding concern.

6. Safeguarding Roles & Responsibilities

| | |
|---|--|
| Principal Safeguarding Officer | Director of Unite Foundation - Fiona.ellison@unitefoundation.org.uk Head of Operations - Helen.arber@unitefoundation.org.uk |
| <ul style="list-style-type: none"> • To have overall responsibility for implementation and promotion of the Unite Foundation's Safeguarding Policy. • To ensure that the Safeguarding Policy and guidance is updated regularly and reflects changes to legal requirements and good practice. • To have oversight of and coordinate the response to all safeguarding concerns. • To maintain adequate records of any safeguarding allegations, investigations or referrals and their outcomes. | |
| Designated Safeguarding Officer | Scholarship Scheme Manager Laura.Bowman@unitefoundation.org.uk |
| <ul style="list-style-type: none"> • To receive reports of welfare concerns for children or adults at risk. • On receipt of a report of the discovery of a concern or allegation of a safeguarding issue, to report this to the Principal Safeguarding Officer to coordinate any response. • To make adult and child safeguarding referrals to the nearest Local Authority Safeguarding Adults Board or Local Authority Designated Officer as appropriate. | |
| Board of Trustees | Shan Wareing - c/o Info@unitefoundation.org.uk |
| <ul style="list-style-type: none"> • To have ultimate responsibility for safeguarding within the organisation and for compliance with all legal obligations. • To consider the health and safety implications of strategic decisions and ensure that emergency planning arrangements are kept up to date. | |

If an individual is at imminent risk of serious harm, the first thing you should do is report the matter to the emergency services, afterwards notifying all members of the senior leadership team. Once the emergency situation is under control and the incident managed, any related safeguarding issues should be reported by following the instructions below.

6.1. If you have concerns about a child or adult at risk who you know to be experiencing, or at risk of, abuse or neglect, but there is no imminent risk of serious harm, you should follow the following guidance (as per Appendix 1):

| • DO | • DO NOT |
|---|--|
| • Stay calm | • Panic or delay |
| • Recognise your feelings, but keep them to yourself | • Over-react |
| • Use language that the person can understand | • Use jargon or express opinions |
| • Reassure the person: • they have done the right thing telling you • they are not to blame • you believe they are telling the truth | • Probe deeply for information Use leading questions |
| • Listen carefully, record what the person says and keep these notes | • Make them repeat the story |
| • Explain what you will do next (i.e. tell the Designated Safeguarding Officer in a simple and clear way | • Promise unconditional confidentiality |
| • Follow the procedure outlined in Appendix 1 and seek advice and support for yourself | • Approach the person against whom the allegation has been made or discuss the disclosure with anyone other than a Designated Safeguarding Officer |

- Report your concern by completing a Safeguarding Concern Form (Appendix 3) and email it to info@unitefoundation.org.uk, copying your line manager.
- Follow the advice or instructions of the DSO, PSO and your line manager in terms of next steps. The PSO, for example, may ask you to send them the written note or other information by email so that the matter can be further explored. They may also ask you to have other conversations locally (for example, they may ask you to have a further discussion with someone – e.g. a resident – to seek some further information or check on their wellbeing.) Or they may tell you that the matter does not fall within the scope of this safeguarding policy and talk to you about other ways in which you and your team can support the individuals affected.

6.2. If you require clarification on any actions you might need to take in relation to a safeguarding concern, speak to the PSO or DSO.

6.3. Where a concern is anonymous, there may be genuine reasons why an individual with a concern or allegation feels unable to disclose their own identity or the identity of the individual(s) at risk or responsible for the alleged abuse/neglect. Anonymous concerns like this should still be processed and reported in accordance with this policy. However, if you receive an anonymous concern, it can be important to mention to the person raising the concern that anonymous concerns may mean that the organisation is unable to investigate, refer or case manage the allegations.

6.4. Confidentiality and protection of personal data is also prescribed by data protection legislation framework. In the case of a whistleblowing report (as contrasted with a safeguarding incident - this can be made directly to the Director on Fiona.ellison@unitefoundation.org.uk. A whistleblower is an employee reporting certain types of wrongdoing in the public interest. Whistleblowers are protected by law; you should not be treated unfairly or risk your employment.

7. Parental and third-party involvement

In normal circumstances the Unite Foundation deals directly with students (with whom it has a contractual relationship) and not with parents or other third parties unless consent has been granted to contact others, and this approach applies to students who are adults at risk or children.

The Unite Foundation has duties under data protection legislation and therefore only discloses information regarding students (including adults at risk or children) to third parties (including parents, guardians and next of kin) in accordance with such legislation and associated policy.

8. Training & Support

The Unite Foundation provides a copy of this policy and procedure in induction packs for all new staff.

- The Unite Foundation provides training, including regarding child and adults at risk protection and health & safety guidance, to all relevant staff and volunteers upon appointment.
- Safeguarding training for all staff is mandatory and all named roles have Level 3 qualifications encompassing aspects including the Six Principles of Adult Safeguarding as captured in The Care Act

1 Empowerment - People are supported and encouraged to make their own decisions and informed consent. *"I am asked what I want as the outcomes from the safeguarding process and this directly inform what happens."*

2 Prevention - It is better to take action before harm occurs. *"I receive clear and simple information about what abuse is. I know how to recognise the signs, and I know what I can do to seek help."*

3 Proportionality - The least intrusive response appropriate to the risk presented. *"I am sure that the professionals will work in my interest and they will only get involved as much as is necessary."*

4 Protection - Support and representation for those in greatest need. *"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."*

5 Partnership - Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. *"I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me."*

6 Accountability - Accountability and transparency in delivering safeguarding. *"I understand the role of everyone involved in my life and so do they."*

Appendix 1: Underpinning Legislative Framework

Unite Foundation has a common law duty of care to ensure, as far as is reasonably practicable, the health, safety and welfare of any potentially vulnerable individuals and groups accessing its services and facilities. As well as its common law duty of care, Unite Foundation also has obligations under statute and under associated statutory and non- statutory guidance. All of these obligations inform, and are reflected in, this policy and its associated protocols. The main statutes and guidance documents include the following, among others:

England and/or Wales:

- Children Act 1989, 2004
- Care Act 2014
- Equality Act 2010
- Children and Social Work Act 2017
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018
- Statement of Government Policy on Adult Safeguarding 2011
- Protection of Freedoms Act 2012
- Multi-agency practice guidelines: Handling cases of Forced Marriage 2014
- Mandatory reporting of Female Genital Mutilation 2016
- Keeping Children Safe in Education 2022
- United Nations Convention on the Rights of the Child 1989

Scotland:

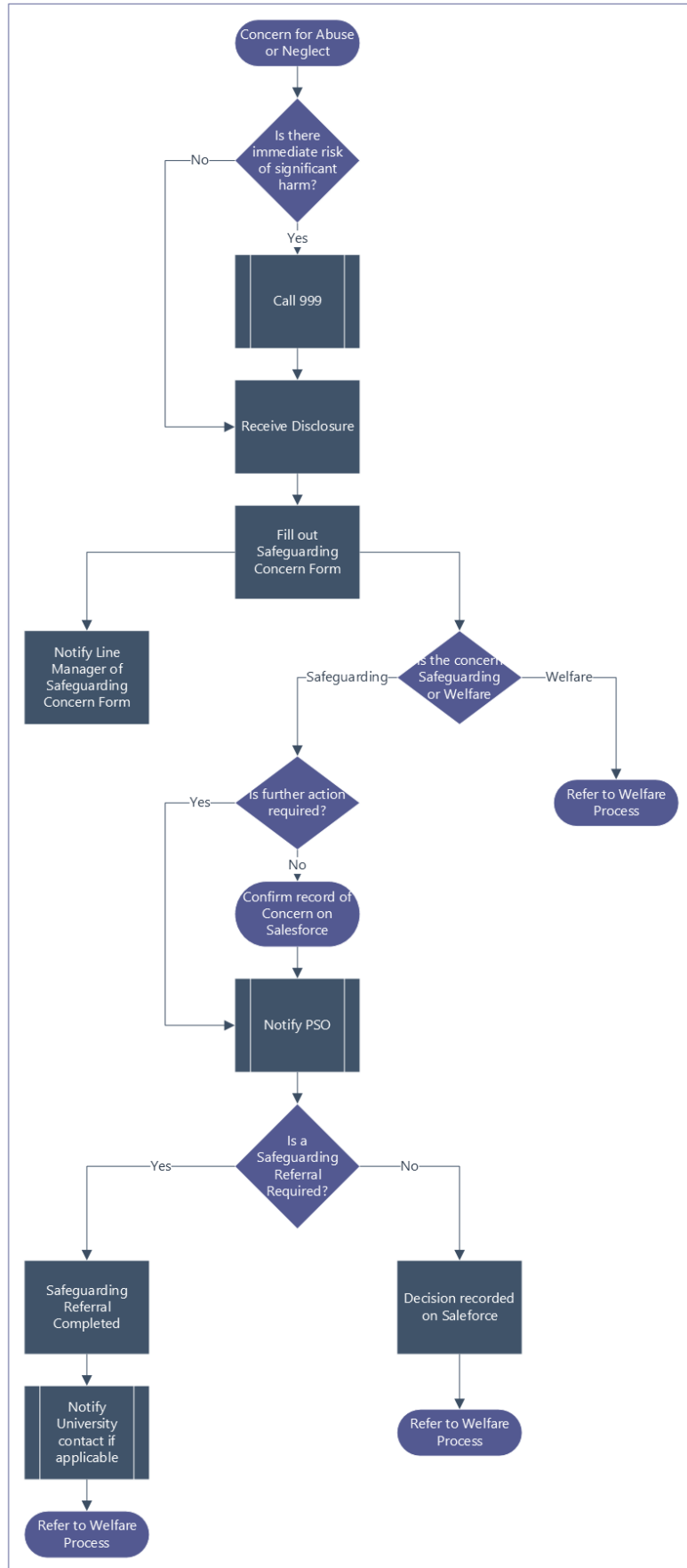
- Children (Scotland) Act 1995
- National guidance for child protection in Scotland 2021
- Adult Support and Protection (Scotland) Act 2007
- Protection of Vulnerable Groups (Scotland) Act 2007
- Children and Young People (Scotland) Act 2014
- Forced marriage statutory and supplementary guidance (2014)
- National guidance for child protection in Scotland (2014)
- Getting it right for every child (2022)
- Act Against Harm guidance on adult support and protection

Northern Ireland:

- The Protection of Children and Vulnerable Adults (Northern Ireland) Order 2003
- The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007
- The Children (Northern Ireland) Order 1995
- Safeguarding Board Act (Northern Ireland) 2011
- Children's Services Co-operation Act (Northern Ireland) 2015
- Criminal Law Act (Northern Ireland) 1967
- Co-operating to Safeguard Children and young people in Northern Ireland 2017
- Adult Safeguarding Prevention and Protection in Partnership (2015)
- Child protection guidance for Northern Ireland

A range of other pieces of legislation and related guidance – in the areas of equality, data protection, health and safety, mental incapacity, human rights, counterterrorism, sexual offences, modern slavery, forced marriage, female genital mutilation, etc. – govern aspects of how we respond to, and manage, safeguarding issues and influence the content of this policy.

Appendix 2: Reporting a Safeguarding Concern - Flowchart



Appendix 3: Safeguarding Concern Form

| | |
|---------------------------------------|----------------------------------|
| Unite Foundation | Safeguarding Concern Form |
|---------------------------------------|----------------------------------|

*Use this form to record **any** safeguarding concern, however trivial. Forward it **immediately** to Laura Bowman, Helen Arber or Fiona Ellison (safeguarding role holders). Answer every question; continue on a blank sheet if necessary.*

| Details of person at risk: | | | |
|--|--|---|--|
| Name of person: | | DOB: | |
| Address: | | Additional protected characteristics: | |
| Age: | | UK jurisdiction (Scotland, England, NI or Wales): | |
| Unite Resident – Yes/No (If resident, please provide UID/Customer ID Number if possible) | | Foundation Scholar? Yes/No | |

| About You (the person filling in this form) : | | | |
|---|--|------------|--|
| Your name: | | Job title: | |
| Date: | | Time: | |

| About the safeguarding concern: | |
|--|--|
| Has this incident been reported in any other way? I.e. AVA, police report etc. If so, please give details : | |
| Are you reporting your own concern or one raised by someone else and reported to you? Yes/No | |
| If you are raising a concern made by someone else, please provide their full name, status and contact details: | |

| | |
|--|--|
| <p>Please provide details of the concern you have including dates, times, descriptions of events, full names and whether the information is first hand or the accounts of others:</p> <p>NOTE – please include exact language used. If communication is written, please copy & paste from original. Give as much detail and information as possible.</p> <p>If concern is first hand – what does the person at risk want the outcome of this to be?</p> | |
| <p>Capture here detail of the conversation about consent to share (if relevant):</p> | |
| <p>Provide any details of the person causing harm (if known):</p> | |
| <p>Provide details of any witnesses to the concern (if known/relevant):</p> | |
| <p>Provide details of any previous incidents or concerns relating to this person (if known):</p> | |

Actions: Please state the immediate actions you took in response to the concern:

| |
|--|
| |
|--|

People contacted:

*Contact people outside Unite Foundation to deal with an **immediate emergency** (for example, police or ambulance service).*

Give details below of any people outside Unite Foundation that you have communicated this concern to – give name, position, contact details, and the date and time that you contacted them:

| |
|--|
| |
|--|

Declaration: I have completed all sections of this form to the best of my knowledge

| | |
|--|--|
| Signature: (Digital Signature Acceptable) | |
|--|--|

Appendix 4 – Type of Abuse and Indicators

| Type of abuse | Example indicators (not exhaustive) |
|---------------------------------------|--|
| Physical abuse | Unexplained injuries, mood change, reluctance to seek medical support, body marks |
| Domestic violence or abuse | Fear of outside intervention, damage to home or property, isolation from social networks, limited access to money |
| Sexual abuse | Infections, unexplained genital discharge, or sexually transmitted diseases. Significant changes in sexual behaviour or attitude, self-harming |
| Psychological or emotional abuse | Mood change, reduced self-esteem, change of appetite, weight loss/gain. Signs of distress: tearfulness, anger |
| Financial or material abuse | Missing possessions, unexplained lack of money or withdrawal of funds, rent arrears or eviction notices |
| Modern slavery | Living and working at the same address, lack of personal effects or identification, always wearing the same clothes |
| Discriminatory abuse | Withdrawal/isolation, expressions of anger, frustration, fear or anxiety. Support/service does not account for the person's needs in terms of a protected characteristic |
| Organisational or institutional abuse | Inadequate staffing levels, poor standards of care, lack of adequate procedures |
| Neglect or acts of omission | Dirty or unhygienic conditions, poor physical condition and/or personal hygiene, unexplained weight loss |
| Self-neglect | Unkempt appearance, lack of essential food, clothing or shelter. Squalid or unsanitary conditions, hoarding |