

## **Brightside safeguarding policy 2022**

Date adopted: August 2022

Next review date: July 2023

Reviewed by: Laura Gray, Chief Executive Officer  
Chris Mattinson, Head of Programmes  
Milena Lasheras-Maas, Deputy Head of Programmes

## 1. Introduction

This safeguarding policy forms part of the terms and conditions of service of all employees, paid and voluntary, working with young people and adults accessing services from Brightside. The conditions above equally apply to contractors working on behalf of Brightside who must adhere to the same terms and conditions outlined in this safeguarding policy.

The policy complies with current legislation and guidance in England where the service is based together with information and access to the other devolved nations statutory services. The fundamental consideration in this policy is for “employees” to be aware and responsive to children and adults using the services of Brightside who may be open to significant harm or risk to their welfare and wellbeing.

This policy will be reviewed annually by the senior lead(s) for safeguarding, with recommendations for changes signed off by the chief executive and reported to the board of trustees.

### 1.1 Principles

The following principles are in compliance with the government’s Working Together to Safeguard Children 2018 guide, which places the child’s welfare as the paramountcy principle. This is based on the Children and Social Work Act 2017 which similarly places the child in focus when making decisions about their lives, as well as, the UN Convention on the Rights of the Child.

Brightside is committed to the general principle that everyone who works with children has a responsibility for keeping them safe.

These principles underpin Brightside’s child protection and safeguarding policy:

- The welfare of the young person is paramount
- All young people, without exception, have the right to be protected from physical and verbal harm and abuse
- All staff and volunteers who come into contact with children have a duty to remain alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children
- All suspicions and allegations of abuse will be taken seriously and responded to immediately and appropriately
- Brightside’s staff and trustees have a responsibility to report concerns about any child or adult to the relevant authority

## 1.2 Purpose

The purpose of Brightside's safeguarding policy is to prevent harm and where children or adults have experienced harm ensure these concerns are reported without delay to the local statutory services children services and/or police where the child or adult lives.

The reporting of such concerns must be the priority of all concerned as delay may contribute to further significant harm of a child or adult.

Please note: if a concern is raised to an employee, volunteer, trustee or contractor this must be reported on the day the concern was raised to one of the designated safeguarding staff listed below and where necessary the statutory services via contact by phone and referral where necessary.

The designated safeguarding leads are:

**Laura Gray, Chief Executive Officer (CEO):** [laura.gray@brightside.org.uk](mailto:laura.gray@brightside.org.uk)

**Milena Lasheras-Maas, Deputy Head of Programmes:** [Milena.Lasheras-Maas@brightside.org.uk](mailto:Milena.Lasheras-Maas@brightside.org.uk)

**Chris Mattinson, Head of Programmes (HoP):** [chris.mattinson@brightside.org.uk](mailto:chris.mattinson@brightside.org.uk)

One of the above will be available on any working day to discuss your concerns regarding a child or adult.

If you are concerned about an adult or child outside of normal working hours (Monday to Friday 9am to 5.30pm) please contact our emergency out of hours number: 0800 955 0158.

Text enabled access number for hearing impaired or those who have a disability which may prevent their access to the above number is: 0203 151 9471.

One of our designated safeguarding leads will be available on this number.

## 2. Responding to a child or adult making an allegation

If an allegation or safeguarding concern is made by a child or adult the following procedures should be observed:

- Listen carefully to what is said and keep listening
- Find an early opportunity to explain to the child or adult that the information will need to be shared with others – do not promise to keep secrets
- Only ask questions for clarification and avoid asking questions that suggest a particular answer
- Don't promise confidentiality
- Reassure the child or adult that they have done the right thing in telling you

- Tell them what you will do next and with whom the information will be shared
- Record in writing what was said using their own words, as soon as possible
- Note date, time, any names mentioned to whom the information was given and ensure that the record is signed and dated and kept safely
- Contact one of the designated safeguarding leads within Brightside

The person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred. That is the task of the professional child protection agency (the local authority children services or social services (adult care) responsible for their welfare and wellbeing following a referral to them to investigate.

## **2.1 Contact and referral process - employee/volunteer/contractors' responsibility**

Where safeguarding concerns exist, these must be discussed with one of the designated safeguarding leads above. Contact with children's services (Welfare Concern) or police (Criminal Concern) must be with the children's services or adult care services where the child or adult lives.

Where there is a criminal concern the police must be contacted on 101 or 999 if there is an immediate risk of harm to a child or adult.

Employees/volunteers/contractors should complete a disclosure/incident form (at the end of this policy) and send it to the designated safeguarding lead.

## **2.2 Reporting and recording child protection and safeguarding concerns**

All child protection concerns raised within the team or with the designated safeguarding leads should be logged. The designated safeguarding lead dealing with the concern is responsible for storing any documentation related to said concern in a confidential folder on our internal systems that only appropriate staff have access to.

Information gathered should include:

- Description of the concern
- Who raised it
- What action was taken (if any)
- The reason for no action being taken (if applicable)
- Details of the child (name, date of birth, postcode)

## 2.3 Designated safeguarding lead link to the four nations statutory services

The links below assist with reporting a child or adult at risk of harm to the correct area of the four nations of the UK.

Please note: the concerns should always be referred to the specific region/council where the child or adult lives

**England:** Reporting at Child at Risk <https://www.gov.uk/report-child-abuse>

**Northern Ireland:** HSC Health and Social Care <https://www.nidirect.gov.uk/articles/reporting-child-abuse-and-neglect>

**Scotland:** Disclosure Scotland [www.mygov.scot/report-child-abuse](http://www.mygov.scot/report-child-abuse)

**Wales:** Welsh Government Wales Safeguarding Procedures <https://gov.wales/reporting-suspected-abuse-harm-or-neglect-safeguarding>

## 2.4 Allegations made against employees/volunteers/contractors /trustees

In the event of a child or adult making an allegation against a Brightside employee, trustee or volunteer or contractor to a Brightside employee, directly to the management team or to another outside agency or source (which may include a university, school, or college) the chief executive of Brightside or the chief operating officer (in the chief executive's absence) will be informed without delay of such allegations. In the event of an allegation being made against the chief executive, the chair of trustees will be informed.

At this point a 'case manager' for ease of reference will be assigned to manage this allegation and be the key contact for communication with the investigating agencies and link to the person who has been accused of an allegation in terms of support and updates.

Consideration should be given after receiving information about the allegation and enquiries caused to establish facts as to whether the Brightside board may consider suspension of the "person" as a neutral act (this may also require dialogue with an outside contractor's HR department) and referral to the statutory services where necessary.

Brightside do not have powers of investigation of safeguarding matters but are required to cause enquiries and establish facts, for example statements from witnesses, that will assist the statutory services if and when a referral is required.

## 2.5 Notifying the Disclosure and Barring Service (DBS) or equivalent

The Local Authority Designated Officer (LADO)/Multi Agency Safeguarding Hub (MASH)/Children's services will discuss with the employer whether they need to refer the employee or volunteer to the DBS (or equivalent in devolved nations). If the allegation is substantiated and the person is dismissed or the organisation ceases to use the person's services, or the person resigns or ceases to provide their services, then:

- There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child or adult; or if a person otherwise poses a risk of harm to a child or adults at risk
- or if there is reason to believe that they have committed one of a few listed offences (as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions Regulations 2009), and have been removed from working in paid or unpaid regulated activity or would have been removed had they not left

## 2.6 Whistleblowing

Whistleblowing is the reporting by employees or suspected misconduct, illegal acts or failure to act within the procedures outlined in this policy. Employees and others who have serious concerns about others in relation to safeguarding concerns should come forward and voice those concerns.

Such employees are protected by law and will not be treated unfairly because of whistleblowing. A whistleblowing advice line is available through the NSPCC: 0808 800 5000, email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Employees concerns will be acted upon in the strictest confidence with a senior management person assigned to investigating these concerns within defined timeframes where possible.

## 2.7 Information sharing protocol

There must be a legal basis for sharing information and a legitimate purpose for doing so. When dealing with confidential information, Brightside will need to be satisfied that there is either:

- a statutory obligation to disclose
- expressed or implied consent from the persons involved or
- an overriding public interest in disclosing information

The Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.

### **3. Brightside's procedures recognise that children and adults say they need:**

- Vigilance: to have adults (employees) notice when things are troubling them
- Understanding and action: to understand what is happening, to be heard and understood and to have that understanding acted upon
- Stability: to be able to develop an ongoing and stable relationship of trust with those helping them
- Respect: to be treated with the expectation that they are competent rather than not
- Information and engagement: to be informed about and involved in procedures, decisions, concerns and plans
- Explanation: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
- Support: to be provided with support in their own right as well as a member of their family
- Advocacy: to be provided with advocacy to assist them in putting forward their views
- Protection: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee

All policies and procedures adopted by Brightside apply to children and adults regardless of gender, ethnicity, disability, sexual orientation or religion.

Child abuse is any action by another person – adult or child – that causes significant harm to a child.

The types of child abuse include but are not exclusive to the below:

- Domestic abuse
- Sexual abuse
- Neglect
- Online abuse
- Physical abuse
- Emotional abuse
- Radicalisation

For further definitions please see Appendix 2.

Brightside works with groups of young people, including those who might be from a disadvantaged background and therefore more likely to be exposed to risks than their peers. Brightside also works with children with learning difficulties such as Autism Spectrum Disorder, those with experience of the care system, those with a physical disability, young carers, young people growing up in single parent families, those at risk of becoming NEET (not in education, employment or training), isolated young people and those lacking parental support.

Brightside's work aims to help develop young people's confidence, and therefore it is likely that a high proportion of our target groups may lack confidence or suffer from self-esteem issues. Added to this, a significant proportion of our work is delivered online, where the risk of grooming by others may be a factor. It is therefore crucial that all staff, trustees, volunteers and contractors of Brightside adhere strictly to our safeguarding policy.

An adult at risk of abuse or neglect is defined as an adult who "(a) has needs for care and support (whether or not the local authority is meeting any of those needs), (b) is experiencing, or at risk of, abuse or neglect, (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it."

While Brightside's work does not typically target adults at risk, it is nevertheless important to outline the different vulnerabilities and main forms of abuse that they could face:

- Physical abuse
- Sexual abuse
- Psychological abuse
- Financial or material abuse
- Neglect and acts of omission
- Discriminatory abuse

In addition, it is important that we make the distinction between adults with the capacity to make decisions and adults lacking capacity. Adults who have capacity retain the right to make their own decisions and to direct their own lives. Adults lacking capacity to make decisions, though they retain the right to be involved in decision-making as far as possible, nevertheless require decisions to be made on their own behalf, and the overall approach shifts to promoting their best interests.

It is the duty of all Brightside staff to ensure all people we work with are safe from abuse and any suspicion of abuse is appropriately and promptly dealt with. Whenever possible and appropriate, Brightside will seek the individual's permission before undertaking any action on their behalf to safeguard and promote their wellbeing.

In exceptional circumstances where a beneficiary is deemed to be at risk of significant harm or to have suffered significant harm, to be a danger to another person, confidentiality may need to be



broken. The individual will be informed of our intended action, or in exceptional circumstances the action may already have been taken before the individual can be informed.

## 4. Safe recruitment and employment

In order to honour the principles of child protection and safeguarding we will ensure that:

- Applicants for paid positions within the organisation will be made aware that the position is exempt from the provisions of the Rehabilitation of Offenders Act 1974. This means that since the position is working with children or vulnerable adults Brightside are within their rights to ask questions about a person's convictions both spent and unspent. All applicants will be interviewed prior to appointment and at least two references will be followed up
- Any paid appointments made will be subject to at least three months' probationary period at the end of which a review of this time will be carried out by the appointee's line manager
- Individuals providing online mentoring for young people and adults at risk are eligible for an Enhanced Disclosure due to provision made within the DBS Enhanced Eligibility regulations which make provision for the following "prescribed purpose":

"considering an individual's suitability for any work which is normally concerned with the provision of any form of information, advice or guidance wholly or mainly to children which relates to their physical, emotional or educational well-being and is provided by means of telephone or other form of electronic communication including the internet and mobile text messaging"

- This provision would only extend in relation to children and adults at risk, however ultimately the responsibility as to whether such positions fall within this category rests with the Disclosure and Barring Service (DBS). All staff and volunteers who come into contact with children will undergo an enhanced DBS check every three years
- Where a staff member or volunteer is unable to provide required documentation to apply for DBS check due to asylum or refugee status, then such person is obliged to sign a 'Volunteer Safeguarding Agreement' and provide at least two character references (i.e. an employer, lecturer, doctor) and at least one proof of identity in order to participate in the mentoring project/s

(additional information in Appendix 2 Disclosure and Barring Services)

## 5. Responsibilities of management

**5.1** Within the operational team there are three designated safeguarding leads (DSL) named at the beginning of the policy who manage all aspects of child protection awareness and implementation of this policy. All DSLs are trained as NSPCC Designated Safeguarding Children Officers.

The DSLs are responsible for:

- ensuring that this policy is implemented throughout Brightside's activities including liaison with staff and volunteers

- ensuring all necessary child protection and safeguarding concerns, related enquiries, procedures and investigations are carried out
- reporting results of screening enquiries and for preserving a "need to know" levels of confidentiality and access to secure records
- ensuring there is a secure and confidential record keeping system relating to child protection cases and subsequent safeguarding concerns:
  - liaison with social services at a formal and informal level on child protection matters, likewise with the police
  - the reporting of all substantive incidents to the leadership team where appropriate
  - the reporting of allegations and suspicion of abuse to the appropriate authorities
- ensuring there is adequate induction and training relating to safeguarding to all employees, volunteers and contractors where necessary
- ensuring that each activity carried out by Brightside is based on clear understanding and knowledge with regards to safeguarding activity of personnel, practices, premises and including new technologies implemented in relation to mentee experience
- checking all incident reports made by staff, volunteers and contractors are signed and dated, and countersigned by designated safeguarding lead, as detailed below
- referring cases to the Channel Programme where there is a concern about potential radicalisation
- undergoing training to provide employees with the knowledge and skills required to carry out their role, including safeguarding refresher training (every three years) together with Prevent training

**5.2** Laura Gray (CEO) is the senior Designated Safeguarding Lead with responsibility for the strategic overview of safeguarding and operational matters. The CEO will ensure active compliance with this policy by all, and will work closely with the other DSLs to ensure this, affording them every assistance to this end. The CEO is responsible for formally reviewing the safeguarding policy and procedures annually, for their ongoing evaluation and improvement, and for promoting understanding and awareness of them to staff, trustees, volunteers, contractors and young people.

The CEO will support staff who have been party to or involved in a safeguarding matter where there are concerns about a child or safeguarding allegations against staff, volunteers or contractors (unless this allegation is directly related to the CEO, in which case this role escalates to the chair of trustees).

**5.3** All staff, including volunteers, contractors and part-time workers employed by Brightside, together with members of the board of trustees of Brightside accept and recognise their responsibilities to safeguard and promote the wellbeing of children and vulnerable adults with whom they come in contact, either in person or online.

## **6. Code of conduct for employees/trustees/volunteers/contractors (procedures)**

### **6.1 Working with young people in a face-to-face environment**

When working directly with children and adults the following code of practice will be adhered to:

- All children and adults are treated with respect
- Ensure that whenever possible there is more than one adult present during activities with children and/or vulnerable adults or at least that you are within sight or hearing of others
- Respect a young person's right to personal privacy and confront attitudes or behaviour that are inappropriate, discriminatory and/or abusive.
- Always remember that someone else may misinterpret your actions, no matter how well intentioned
- Special caution is required when you are discussing sensitive issues with children and adults
- Challenge unacceptable behaviour
- Report all allegations/suspicions of harm or abuse

### **6.2 Relationships with children and adults at risk**

- Where possible, minimise time spent alone with a child or adult you are working with. If this is unavoidable, reduce the risks as much as practicable. For example:
  - Seek appropriate management permission before you start work
  - Inform somebody in a management position that you will be working with the young person
  - Work in an open space where other people can see you and you can see them
  - Never be alone with a child in a room with the door shut
  - Never take children or vulnerable adults alone in a car/on journeys, however short
  - Never arrange to meet children or vulnerable adults with whom you come in contact with as part of the work of Brightside outside of the safe confines as detailed at 6.3 below
  - Do not agree to escort a child to and from any activity without written permission from the local authority responsible for the child's care

NB: Foster carers cannot give written permission for a child to engage in a particular activity or to be escorted to and from such an activity. It is the responsibility of the local authority to give this permission. In circumstances where a child is not subject to a care order, but is looked after by the local authority, the written permission of birth parents should also be sought by the local authority.

Brightside does not have the responsibility to gain permission from birth parents of children who are not subject to care orders: it is the responsibility of the local authority.

Under no circumstances should you ever:

- Engage in rough physical games including horse-play
- Engage in sexually provocative games
- Allow or engage in inappropriate touching in any form, remember physical contact with a child may be misinterpreted
- Allow children to use inappropriate language unchallenged
- Make sexually suggestive comments about/to a child, even in fun
- Allow allegations a child makes to go ignored or unrecorded
- Do things of a personal nature for children that they can do for themselves
- Have inappropriate physical or verbal contact with children
- Allow yourself to be drawn into attention seeking behaviour/make suggestive or derogatory remarks or gestures in front of children
- Exaggerate or trivialise child abuse issues

### **6.3 Supervision of young people and adults: planned activities (face-to-face)**

Brightside will ensure, (and undertake to ensure to the best of our knowledge and our partner organisations), to make arrangements for proper supervision of young people to minimise the risk of suffering harm or abuse of any kind while in our care.

Our code of conduct in this respect is:

- Prepare a detailed programme of activities for the child or adult
- Welfare and safety of the children or adult are your responsibility while they are in your care
- Children and adults should be adequately supervised and engaged in suitable activities at all times
- Local authority, and/or parental consent should be obtained in writing for children and vulnerable adults to participate in activities
- Carry out a 'risk assessment' of the environment where the activity is taking place
- Children must be supervised at all times by two or more adults
- Children must not be left unsupervised at any time

- Workers should know at all times where children are and what they are doing
- Dangerous behaviour of children or adults should not be allowed

Staff will encourage all participants to develop self-awareness and independence in making choices and in finding names for their own feelings and encourage acceptable ways to express them. This will encourage the participants to develop their self-confidence within a group setting.

## **6.4 Responding to a suspicion of abuse**

Through constant contact between staff, volunteers and contractors, observations of any changes in behaviour or appearance will instigate enquiries by Brightside. The strictest confidence will be maintained.

All partner organisations will be made aware of Brightside's safeguarding policy. When working on the site of a partner organisation, Brightside staff must comply with the partner's safeguarding procedures, in addition to alerting the DSL at Brightside where appropriate.

When dealing with a local authority, if the response from them is unsatisfactory, we will follow the Safeguarding Partnerships (SP) procedure for resolving professional indifference. SPs coordinate the work to safeguard children locally and monitor and challenge the effectiveness of local arrangements.

If delivering external sessions (workshops, inductions, summer schools etc.) and staff observe any changes in the child's behaviour, physical condition or appearance information will be recorded confidentially and securely and shared with a Brightside DSL for advice. Should concerns persist this information will be recorded through detailed observations without comment or interpretation from staff, the exact words spoken by the child or adult will be recorded, dated and timed and signed by the member of staff running the sessions. These records will be filed confidentially, separately and securely; access will be given to the partner coordinator and the Brightside DSL as appropriate. If requested these will be passed on to the relevant statutory outside agencies.

The signs of child abuse might not always be obvious and a child or adult might not tell anyone what is happening to them. Staff and volunteers should therefore question behaviours if something seems unusual and try to speak to the child or adult, alone if appropriate, to seek further clarity and information.

## **6.5 Online communication with children and adults**

If, through the monitoring of communications between mentors and mentees there is any suspicion of concern or abuse of a child or adult, staff members must immediately report their concerns to a Brightside DSL and partner service where they are the DSL as outlined in the contract of work. In addition to this escalation, the communication should be archived along with all online communications as part of the standard audit trail implemented by Brightside (see policy statement on website security found in section 5).

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## 6.6 Sharing contact details

Brightside volunteers and staff are not permitted to share their personal contact details with young people. In their position of trust, volunteers and staff are encouraged to remind young people about the professional boundaries of their mentoring relationship or otherwise. If a young person contacts a member of staff or trustee through social media, it is duty of that staff member or trustee to report it to the DSL.

It is not appropriate for mentors and mentees to be in touch with each other outside of the context of their mentoring relationship unless under the safe confines detailed at 6.3 above. This is a professional boundary issue.

## 6.7 Protecting young people's personal information

- Young people's data (including their contact details) should be stored securely
- When data is downloaded from the mentoring site or collected in hard copy format:
  - Files containing young people's personal information, computers should be locked each time a staff member moves away from their desk
  - Hard copies of personal information should be stored in a lockable cabinet and shredded as soon as they are no longer needed
- When sending or receiving files containing young people's personal information files should be password protected and passwords sent in a separate communication to the file
- For further information regarding data security please see the Brightside data protection policy

**6.7.1** Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of the child or adult, which must always be the paramount concern.

**6.7.2** Employees must have due regard to the relevant data protection principles which allow them to share personal information, as provided for in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

## **Myth-busting guide to information sharing**

Sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of children.

Below are common myths that may hinder effective information sharing.

### **Data protection legislation is a barrier to sharing information**

No – the Data Protection Act 2018 and GDPR do not prohibit the collection and sharing of personal information, but rather provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them.

### **Consent is always needed to share personal information**

No – you do not necessarily need consent to share personal information. Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's or young person's safety at risk.

### **Personal information collected by one organisation/agency cannot be disclosed to another**

No – this is not the case, unless the information is to be used for a purpose incompatible with the purpose for which it was originally collected. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners.

### **The common law duty of confidence and the Human Rights Act 1998 prevent the sharing of personal information**

No – this is not the case. In addition to the Data Protection Act 2018 and GDPR, practitioners need to balance the common law duty of confidence and the Human Rights Act 1998 against the effect on individuals or others of not sharing the information.

### **IT Systems are often a barrier to effective information sharing**

No – IT systems, such as the Child Protection Information Sharing project (CP-IS), can be useful for information sharing. IT systems are most valuable when practitioners use the shared data to make more informed decisions about how to support and safeguard a child.

## 7 Useful contact numbers

**7.1** Brightside has a dedicated safeguarding emergency phone number, which is available out of office hours (before 9am and after 5.30pm) for any safeguarding concerns and emergencies for projects where Brightside is the safeguarding lead. The safeguarding emergency phone number is 0800 955 0158. Please note that this number cannot accept text messages.

**7.2** Brightside has a second child protection emergency number which is text enabled for use on programmes where participants are hearing impaired or have any disability which may prevent them from reporting an incident through spoken and heard word. This number is 0203 151 9471.

**7.3** One of the three DSLs will be available to answer the emergency help line. They will also be responsible for making sure the designated phones for this line are functioning properly and charged.

**7.4** Brightside will keep written records of any child protection incidents, allegations or concerns. If a call or text message is received on the dedicated line, the DSL at Brightside shall record details of any actions taken and the contact details of anyone who was involved, as appropriate, on the form provided in Appendix 3.

**7.5** If the DSL requires further information about the concern raised, the individual raising the concern may be asked to fill in the form provided in Appendix 3 as well. Information should be recorded in a factual way.

**7.6** The DSL shall keep the individual who reported the incident informed about what Brightside has done with the information.

**7.7** If for any reason the DSL at Brightside is not available to respond to the concern, the individual who wants to report the concern must avoid delay and seek advice from the local Children's Services or the police, before informing the DSL at Brightside as soon as possible, explaining the concern and action taken.

**7.8** Where Brightside is the safeguarding lead, volunteers should be made aware of the emergency safeguarding number during training and in written communications.

**7.9** For contact details within the social care system, please use the below links:

- [If child or adult is located in England](#)
- [If child or adult is located in Scotland](#)
- [If child or adult is located in Northern Ireland](#)
- [If child or adult is located in Wales](#)



## 8. Extremism and radicalisation

**8.1** Extremism and radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to inclusive values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

**8.2** Teaching a child or young person extremist views and radicalisation is a form of child abuse as classified by the NSPCC.

**8.3** Prevent is a government lead scheme that aims to safeguard people and communities from the threat of terrorism. Prevent is one of the four elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

**8.4** If there is a concern about a child or young person regarding extremism and radicalisation staff members are will use the escalation protocol indicated in Appendix 1.

**8.5** The Department for Education also has a dedicated telephone helpline, 02073 407264 that anyone can call to raise concerns about extremism with respect to a child or young person. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk).

**8.6** In an emergency, staff should call 999 or the confidential anti-terrorist hotline on 0800 789321 where you think:

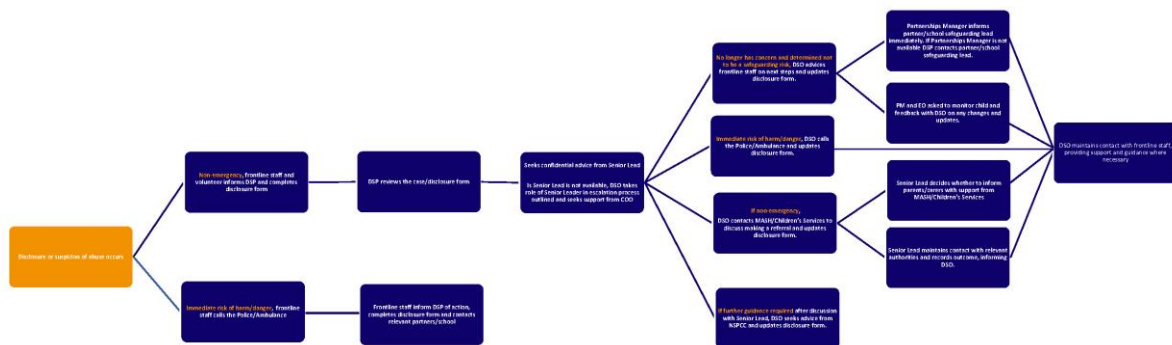
- Someone is in immediate danger
- Someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist related

**8.7** There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. For further information about warning signs visit the government website [Educate Against Hate](#).

**8.8** Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour staff should have confidence in their instincts and seek advice if something feels wrong.

## 9. Appendices

Appendix 1: Escalation Protocols



## Appendix 2: Disclosure & Barring Services policy

### General principles

An application for a criminal record check is only submitted to the Disclosure and Barring Service (DBS) after a thorough risk assessment has indicated that one is proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all applications forms, job adverts, and recruitment briefs will contain a statement that a Disclosure will be requested in the event of an individual being offered the position.

Brightside ensures that all those in Brightside who are involved in the appointment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

Where a Disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. Unless the nature of the position allows Brightside to ask questions about their entire criminal record we only ask about unspent convictions as defined in the Rehabilitations of Offenders Act 1974.

### The Disclosure and Barring Service

As an organisation that uses the Disclosure and Barring Service (DBS) service to help assess the suitability of applicants for positions of trust, Brightside will ensure that it complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. Brightside will also ensure that it, and its partner organisations, complies fully with their obligations under the General Data Protection Regulation

Brightside safeguarding policy, August 2022

(GDPR) and other relevant legislation pertaining to the safe handling, use storage, retention and disposal of disclosure information.

#### Types of disclosure

There are three types of disclosure:

1. Basic Disclosure

This will contain details of convictions held in central police records which are not spent under the terms of the Rehabilitation of Offenders Act 1974 or will state if there are no such convictions. Any employer will be able to request a potential employee to apply for a basic disclosure.

2. Standard Disclosure

This will contain details of spent and unspent convictions, as well as cautions, reprimands and warnings, recorded by the police centrally. It will also indicate if there are no such matters on record. If an individual is applying for a position working with children, the standard disclosure will also reveal whether the individual is barred from working with children by virtue of their inclusion on lists of those considered unsuitable to work with children maintained by the Department of Education and Employment and the Department of Health.

3. Enhanced disclosure

This disclosure will apply to a subset of those within the terms of the exception order under the Rehabilitation of Offenders Act 1974. They will be used principally for those involved in regular caring, training, supervising or being in sole charge of those aged under 18, or of vulnerable adults and certain other matters, including certain purposes in relation to gaming and lotteries and adoption and fostering. The enhanced disclosure will contain the same information as the standard disclosure. It may also contain non-conviction information from local police records which a chief police officer thinks may be relevant in connection with the matter in question.

#### **Transgender applicants**

The Disclosure and Barring Service (DBS) offers a confidential checking service for transgender applicants in accordance with the Gender Recognition Act 2004. This sensitive applications route is available for all levels of DBS check; basic, standard and enhanced. It gives transgender applicants the choice not to have any gender or name information disclosed on their DBS certificate, that could reveal their previous identity.

The DBS guidance that Brightside shares with staff, trustees and volunteers contains information about the sensitive applications route, including contact details, to ensure that transgender applicants are aware of this service.

#### **Non-UK applicants**

The Disclosure and Barring Service cannot access criminal records which are held overseas, so for non-UK applicants an alternative criminal records check will be required.

### **Applicants with asylum or refugee status**

Where a staff member or volunteer is unable to provide required documentation to apply for DBS check due to asylum or refugee status, then such person is obliged to sign a 'Volunteer Safeguarding Agreement', provide at least two character references (i.e. an employer, lecturer, doctor) and at least one proof of identity in order to participate in the mentoring project/s.

### **Storage and access**

Within Brightside, disclosure information will be kept on individual electronic secure HR file with access strictly controlled and limited to those who are entitled to see it as part of their duties as DBS counter signatories.

### **Handling**

In accordance with section 124 of the Police Act 1997, Brightside will ensure that disclosure information is only passed to those who are authorised to receive it in the course of their duties. A record of all those to whom disclosure and disclosure information has been revealed will be kept and we recognise that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

### **Usage**

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

### **Retention**

Once recruitment, training and placement of a volunteer have been completed, Brightside does not keep disclosure information for any longer than is absolutely necessary. This is generally for a period of up to three year, to allow for the consideration and resolution of any disputes or complaints and any delays in placing the volunteer. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six months, Brightside will consult the DBS and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

### **Disposal**

Once the retention period has elapsed, Brightside will ensure that any disclosure information is immediately and suitably destroyed by secure means, i.e. by shredding or deleting from electronic HR file. While awaiting destruction, disclosure information will not be kept in any insecure receptacle (e.g. waste bin or waste sack). No photocopies or other images of the disclosure or any copy or representation of the contents of the disclosure will be kept. However, notwithstanding the above, a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique number of the disclosure and the details of the recruitment decision taken.

## **Recruitment of ex-offenders**

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), Brightside complies fully with the code of practice and undertakes to treat all applicants for positions fairly. We undertake not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

Brightside can only ask an individual to provide details of convictions and cautions that Brightside are legally entitled to know about. We can only ask an individual about convictions and cautions that are not protected.

Brightside is committed to the fair treatment of its staff, potential staff, volunteers or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background. We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.

## **Interviews**

At interview, or in separate discussions, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment or volunteering role.

## **Other responsibilities**

Brightside and its partner organisations undertake to discuss any matter revealed in a disclosure with the person seeking the position before withdrawing a conditional offer of employment or voluntary position.

Having a criminal record will not necessarily bar them from working or volunteering with Brightside. This will depend on the nature of the position and the circumstances and background of the offences.

It is an offence for someone to apply for, offer to do, accept or do any work with children (paid or unpaid) if disqualified from working with children. Disclosures show current and spent convictions, cautions, reprimands and warnings held on the police national computer. In addition, the following may also be searched:

- Protection of Children Act (POCA) list
- Protection of Vulnerable Adults (POVA) list
- Information that is held under Section 142 of the Education Act 2002 (formerly known as List 99)

An enhanced disclosure will also check information held on the applicant by local police forces.

Disqualification can arise from inclusion on lists of those considered unsuitable to work with children or who are barred from employment in the education sector held by the Department of Health and the Department for Education. In addition, the courts can disqualify those convicted of serious offences of a sexual or violent nature from working with children by imposition of a disqualification order. It is an offence knowingly to offer a disqualified person work with children or to allow them to continue in such work.

Brightside recommends that partner organisations should have an appropriate disclosure policy in place; otherwise they may open themselves to legal challenge under the Human Rights Act 1998 on the grounds that the organisation failed to protect their clients (mentees, students, pupils etc.) sufficiently from abuse of known offenders.

### **Appendix 3 - definitions of abuse and potential signs of abuse**

Abuse is any action by another person that causes significant harm to a child or adult at risk. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online. The NSPCC estimates that over a half a million children are abused in the UK each year.

Type of abuse	Children who are victims of this abuse may:
Domestic abuse – children who witness domestic abuse	Become aggressive Display anti-social behaviour Suffer from depression or anxiety Not do as well at school – due to difficulties at home or disruption of moving to and from refuges
Sexual abuse - when they are forced or persuaded to take part in sexual activities  Child sexual exploitation – a type of sexual abuse in which children are sexually exploited for money, power or status	Avoid being alone with people, such as family members or friends Seem frightened of a person or reluctant to socialise with them Show sexual behaviour that is inappropriate for their age Use sexual language or know information that you wouldn't expect them to



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Neglect – the ongoing failure to meet a child’s basic needs	<p>Have poor appearance and hygiene, unwashed or inadequate clothes</p> <p>Seem hungry or turn up to school without lunch money</p> <p>Have health and development problems such as untreated injuries, medical and dental issues, recurring illnesses or infections or poor language, communication or social skills</p> <p>Have housing and family issues, for example living in an unsuitable home environment, or they may have taken on the role of carer for other family members</p>
<p>Online abuse – any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones</p> <p>Bullying and cyberbullying – at school, at home or online. Usually repeated over a long period of time</p>	<p>Spend lots, much more or less time online, texting, gaming or using social media</p> <p>Be withdrawn, upset or outraged after using the internet or texting</p> <p>Secretive about who they are talking to and what they are doing online or on their mobile phone</p> <p>Have lots of new phone numbers, texts or email addresses on their phone, laptop or tablet</p>
Physical abuse – deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts	<p>Bruises</p> <p>Burns or scalds</p> <p>Bite marks</p> <p>Fractures or broken bones</p> <p>Other injuries or health problems</p>
Emotional abuse – maltreatment or neglect. Sometimes called psychological abuse	<p>Use language, act in a way or know about things that you wouldn’t expect them to know for their age</p> <p>Struggle to control strong emotions or have extreme outbursts</p> <p>Seem isolated from their parents</p> <p>Lack social skills or have few, if any friends</p>



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Female genital mutilation (FGM) – the partial or total removal of external female genitalia for non-medical reasons	<p>Not know what’s going to happen. But she may talk to you about:</p> <ul style="list-style-type: none"> <li>• A long holiday abroad or ‘going home’ to visit family</li> <li>• Relative or cutter visiting from abroad</li> <li>• A special occasion or ceremony to ‘become a woman’ or get ready for marriage</li> <li>• A female relative being cut – a sister, cousin or older female relative</li> </ul>
Child trafficking – where children are recruited, moved or transported and then exploited, forced to work or sold	<p>Spend a lot of time doing household chores</p> <p>Rarely leave their house, and have no freedom of movement or time for playing</p> <p>Be orphaned or living apart from their family</p> <p>Live in substandard accommodation</p>
Grooming – online or in the real world, by a stranger or someone they know – for example a family member, friend or professional	<p>Be very secretive</p> <p>Have older boyfriends or girlfriends</p> <p>Go to unusual places to meet friends</p> <p>Have new things such as phones they can’t afford or won’t explain</p> <p>Have access to drugs or alcohol <sup>1</sup></p>

#### Appendix 4

Role	Training level	Regularity	Date last received
X 3 Designated Safeguarding Leads (DSL)	Designated Safeguarding Officer training via NSPCC: <a href="https://learning.nspcc.org.uk/training/designated-safeguarding-officer-dso">https://learning.nspcc.org.uk/training/designated-safeguarding-officer-dso</a>	Minimum of 1 DSL to receive NSPCC refresher course annually	Chris Mattinson: Jan 2021 Milena Lasheras-Maas: Jan 2022 Laura Gray: Feb 2022

<sup>1</sup> NSPCC, July 2020





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Board of Trustees	Annual refresher delivered by DSL(s) following annual review of policy	Annually	April 2022
Staff Team	Introduction to safeguarding and child protection via NSPCC: <a href="https://learning.nspcc.org.uk/training/introduction-safeguarding-child-protection">https://learning.nspcc.org.uk/training/introduction-safeguarding-child-protection</a>	Within first two weeks of induction	n/a
	Annual refresher delivered by DSL(s) following annual review of policy	Annually	March 2021
Programmes Team	Safeguarding at Brightside session with DSL	Within first two weeks of induction	n/a
Volunteers	During induction training and again when allocated to a specific project as a mentor	n/a	n/a

### All Employees

All employees, volunteers, trustees receive suitable training and updates annually to ensure all carry out their duties with regards to safeguarding with due diligence and awareness to any presenting need or concerns of a child or adult accessing the services of Brightside.

### Appendix 5



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## Private and confidential

Disclosure/incident /child protection /safeguarding concerns notification form

Date:		Name and role of person completing form:	
Name of child or adult:		Name and role of person to whom the child or adult disclosed- the incident/concerns:	

Details of disclosure/incident/child protection/safeguarding concerns



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Date of disclosure / incident/concern:		Location of disclosure incident/concern:	
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Action taken by person(s) above:



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Date of DSL notification:	Name of Designated Safeguarding Lead (Brightside):
Action taken by Designated Safeguarding Lead (Brightside):	
Notes of feedback between Designated Safeguarding Lead and the person who raised this child protection concern, including date of feedback:	

## Appendix 5: Staff member acknowledgement

To be signed by Brightside employees and trustees and returned to [laura.gray@brightside.org.uk](mailto:laura.gray@brightside.org.uk)

I confirm that I have read and understood Brightside's safeguarding policy and will act in accordance with it.

I am connected with this organisation in my capacity as a

- Member of staff
- Trustee
- Other (specify \_\_\_\_\_)

Signature:

Print name:

Date:



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