

SAFEGUARDING POLICY

Main Contact: Christine Braun

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Phone: 19788956693

Version control

Date	Action	Next review
	New policy	
	Policy reviewed and approved by Board	

1 Policy Statement

- 1.1 Cresconova Academy (the **Academy**) is committed to protecting people who come into contact with our charity, including the young people who use our services, people who support our work, our trustees, staff and volunteers.
- 1.2 Everyone who works with or on behalf of the Academy needs to be aware of this policy and must act in accordance with it. This policy does not form part of any contract of employment or contract for services and we may amend it at any time. This policy should be read alongside the following staff policies and procedures:
 - 1.2.1 Child Protection policy;
 - 1.2.2 Whistleblowing policy;
 - 1.2.3 Anti-Bullying and Harassment policy;
 - 1.2.4 Staff Code of Conduct; and
 - 1.2.5 Handling of DBS Certificate Information policy.
- 1.3 We publish this Safeguarding policy on our website and we encourage our service users and those around them to report any safeguarding concerns to us.

2 Key Contact

- 2.1 Designated Safeguarding Lead (**DSL**) – Christine Braun, Chief Creative Officer
- 2.2 Email – christine.braun@cresconova.org
- 2.3 Telephone – 19788956693

3 Safeguarding

- 3.1 We use the term safeguarding to refer to the steps that we take to protect people from the risk of harm or abuse that might arise when they come into contact with the Academy.
- 3.2 Safeguarding risks can take many different forms and we have listed some examples below. This list is not exhaustive and it is important to recognise that any action or inaction by another person that causes a violation of a person's human and civil rights is a safeguarding issue, whether deliberate or unknowing, and whether contained in a single act or repeated acts.
- 3.3 Safeguarding risks you must be alert to:
- 3.3.1 **Sexual harassment, abuse and exploitation** – including indecent exposure, exposure to pornographic material, sexual teasing or innuendo, and inappropriate touching.
 - 3.3.2 **Physical abuse** – including hitting, slapping, shaking, throwing, pushing, restraining, burning or scalding or otherwise causing physical harm.
 - 3.3.3 **Emotional or psychological abuse** – including threatening to hurt or abandon, humiliating, blaming, controlling, overprotecting, isolating, intimidating or harassing.
 - 3.3.4 **Bullying or harassment** – including cyber bullying, harassment, or abuse.
 - 3.3.5 **Discriminatory abuse on any of the grounds in the Equality Act 2010** – abuse that is related a person's age, disability, gender identity, marriage or civil partnership status, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
 - 3.3.6 **Abuse of position or culture** – people who target the Academy or abuse a position of trust they hold within the Academy; risks that the Academy's culture could allow poor behaviour.
 - 3.3.7 **Neglect and negligent treatment** – including withholding medication, food or shelter, ignoring medical, physical or emotional needs.
 - 3.3.8 **Commercial or financial exploitation** – including stealing, fraud, misuse or misappropriation of property, possessions or benefits.
 - 3.3.9 **Personal data breaches**
 - 3.3.10 **Health and safety risks**
 - 3.3.11 **Human trafficking and modern slavery** – including slavery, servitude, forced and compulsory labour.
 - 3.3.12 **Extremism and radicalisation**
 - 3.3.13 **Forced marriage**

- 3.3.14 **‘Honour-Based’ abuse and Female Genital Mutilation** – includes any procedure involving partial or total removal of the external genitalia or other injury to the genital organs for non-medical reasons, or breast ironing.

Staff, volunteers and contractors must be vigilant and immediately report any concerns to the Designated Safeguarding Lead.

4 Child Protection policy

- 4.1 The Academy provides lessons, both virtual and in-person, to children between the ages of 8-16.
- 4.2 Staff and volunteers who work directly with children in the course of their role with the Academy must familiarise themselves with our Child Protection policy, which contains the specific guidance and responsibilities that apply when working with children.

5 Responsibilities

Board of Trustees

- 5.1 The Academy’s board of trustees is ultimately responsible for safeguarding and for ensuring that staff and volunteers are competent to carry out their safeguarding responsibilities. The trustees are committed to making sure that all safeguarding concerns and allegations are taken seriously and responded to appropriately.
- 5.2 The trustees will seek to avoid potential conflicts of interest and will remove themselves from any actual conflicts of interest in order to avoid the Academy being compromised in any way in enforcing our safeguarding commitments.
- 5.3 Safeguarding is on the agenda at every board meeting and trustees receive reports on any safeguarding issues. The board will decide whether a safeguarding issue should be reported to the Academy’s regulators and to any other external agency.
- 5.4 The trustees will review this Safeguarding Policy annually or (if sooner) when there are any material changes to safeguarding legislation or guidance.

DSL

- 5.5 The trustees have nominated Christine Braun, Chief Creative Officer, as DSL. The DSL reports directly to the trustees and is responsible for:
- 5.5.1 ensuring that anyone working on behalf of the Academy is made aware of this Safeguarding policy and associated policies;
- 5.5.2 arranging for the board of trustees to review this Safeguarding policy and the Child Protection policy on an annual basis or (if sooner) when there are material changes to the safeguarding legislation;
- 5.5.3 ensuring that the Academy follows safe recruitment practices that are appropriate to the role and the level of risk;

- 5.5.4 arranging safeguarding training for trustees, staff and volunteers on induction and at regular intervals;
- 5.5.5 working to promote a culture of listening to people and encouraging people to speak up;
- 5.5.6 auditing and reviewing compliance with this Safeguarding policy on a regular basis;
- 5.5.7 acting as a point of contact within the Academy for safeguarding questions, concerns or complaints;
- 5.5.8 ensuring that safeguarding concerns are investigated appropriately and in line with this Safeguarding policy;
- 5.5.9 maintaining a record of all safeguarding incidents, concerns, reports and referrals;
- 5.5.10 maintaining contact details of relevant local safeguarding services in the regional area where the Academy operates, police and health services; and
- 5.5.11 liaising with external stakeholders on safeguarding issues.

Staff and volunteers

- 5.6 Everyone who works for or on behalf of the Academy shares responsibility for protecting people who come into contact with the Academy from harm.
- 5.7 All staff and volunteers must:
 - 5.7.1 comply with the Academy's Staff Code of Conduct;
 - 5.7.2 familiarise yourself with the Academy's policies (including this Safeguarding policy and the Child Protection policy) and apply them in your work for or on behalf of the Academy;
 - 5.7.3 report any safeguarding concerns or suspicions using the procedure set out below; and
 - 5.7.4 co-operate with any safeguarding investigation.

6 Reporting Safeguarding Concerns

- 6.1 If you have any concerns that someone may be experiencing, has experienced, or is at risk of experiencing, abuse or exploitation you should make a report to the DSL without delay. You should report safeguarding concerns, even if your concern relates to an incident that occurred some time ago. If your concern relates to the DSL, you should make a report to the Lead Trustee for Safeguarding whose contact details can be found on our website.

- 6.2 If you witness a safeguarding incident, or if an incident has just taken place, and you believe someone is at imminent risk of significant harm, you should call the emergency services by ringing 999 and then report the matter following the process below.
- 6.3 If you are a member of staff or volunteer and you feel unable to raise concerns through the process set out below, you can raise your concerns in accordance with the Academy's Whistleblowing policy.
- 6.4 When you make a report, it is helpful if you can provide details of your concerns including:
 - 6.4.1 the name(s) of the people involved;
 - 6.4.2 a description of each incident; and
 - 6.4.3 the dates, times and location of each incident.

7 Confidentiality

- 7.1 The Academy will treat all safeguarding reports as confidential and information will only be shared on a strictly 'need to know' basis. This may include sharing information with senior managers and/or trustees.
- 7.2 Anyone who makes a report under this procedure will be protected against any negative repercussions as a result of raising a safeguarding concern.

8 Responding to Safeguarding Concerns

- 8.1 Safeguarding reports may reach the Academy through various routes, including telephone calls, text message, social media, face-to-face discussions, or rumours. All concerns must be taken seriously.
- 8.2 If someone raises a safeguarding concern with you, you should:
 - 8.2.1 listen;
 - 8.2.2 empathise with the person making the report;
 - 8.2.3 ask who, when, where, what **but not why**;
 - 8.2.4 repeat what you have been told to check your understanding;
 - 8.2.5 reassure the person making the report that the Academy will treat all safeguarding reports as confidential and that information will only be shared on a strictly 'need to know' basis; and
 - 8.2.6 (if the person receiving the report is not the DSL) make a report to the DSL without delay.
- 8.3 You must keep safeguarding reports confidential. Staff members who breach confidentiality will be subject to disciplinary action up to and including termination of employment.

Action

- 8.4 The DSL will consider the report and will make a decision about how to take the matter forward. This could include:
- 8.4.1 carrying out an internal investigation – when appointing someone to carry out the investigation, the DSL will take account of relevant experience, skills, geographical, cultural, linguistic and legal considerations as well as potential conflicts of interest or loyalty. Support and resources from regional focal points and/or external providers may be sought;
 - 8.4.2 taking action under the Staff Code of Conduct or the Anti-Bullying and Harassment Policy;
 - 8.4.3 bringing voluntary roles to an end;
 - 8.4.4 termination of partnership agreements or other relationships with third parties; or
 - 8.4.5 making a report to external agencies (see below).
- 8.5 In reaching this decision, the DSL will review all of the available information and, if necessary, discuss the matter further with the person who reported the concern.
- 8.6 If there is insufficient information to follow up the report and no way to obtain additional information (for example, if the person making the report did not leave their name or contact details), the DSL will keep a record of the report. Wherever possible, records will be anonymised and used for organisational learning and reporting purposes.

Reporting to the Board and to Regulators

- 8.7 The DSL will inform the board of trustees as soon as a safeguarding report is received. The trustees will be responsible for deciding whether the matter should be reported to the Academy's regulator, the Charity Commission. The Lead Trustee for Safeguarding will act as liaison between the DSL and the full Board when a safeguarding report is received.
- 8.8 In reaching this decision, the trustees will consider the guidance '*How to report a serious incident in your charity*' published by the Charity Commission.
- 8.9 Trustees may delegate authority to make a report to a manager or external agent (for example, a solicitor).

Referrals to External Agencies

- 8.10 Where appropriate, the Academy will refer safeguarding concerns to appropriate external agencies, which may include:
- 8.10.1 the Local Authority Designated Officer (LADO) or Local Safeguarding Adults Board;
 - 8.10.2 the NSPCC helpline by telephoning 0808 800 5000;

- 8.10.3 law enforcement authorities for criminal investigation;
 - 8.10.4 children's social care services;
 - 8.10.5 the Disclosure and Barring Service (DBS) or equivalent barring authority; or
 - 8.10.6 the Charity Commission.
- 8.11 The DSL will undertake a risk assessment before making any report to an external agency. The risk assessment will take into consideration: any risk of further harm to those affected by the alleged incident or incidents; whether those affected want the matter to be reported externally; and/or whether external reporting risks disproportionate consequences for the accused.
- 8.12 Where applicable, a limited description of safeguarding allegations, incidents or concerns may also be provided to institutional donors and other third parties (for example, our insurers).

9 Support for Complainants and Survivors

- 9.1 The Academy adopts a survivor-led approach to safeguarding and the safety and wellbeing of complainants and survivors is paramount.
- 9.2 We will actively seek feedback from complainants and survivors, if and wherever appropriate, in order to improve our safeguarding policies and processes.
- 9.3 Where appropriate, the Academy will offer support to people involved in safeguarding incidents. Support could include (but is not limited to) referrals to, or covering the cost of:
- 9.3.1 psychosocial care or counselling;
 - 9.3.2 medical assistance; or
 - 9.3.3 protection or security assistance (for example being moved to a safe location).
- 9.4 All decisions on support will be led by the individual or, where the individual is a child, with appropriate input from a responsible adult.

10 Partnership working

- 10.1 The Academy will ensure that any formal or contractual relationships with partners, individuals, groups or organisations which involve contact with children include an obligation on the partner to:
- 10.1.1 have appropriate safeguarding policies and procedures in place; and
 - 10.1.2 comply with its statutory and regulatory safeguarding obligations.
- 10.2 Contracts must clearly outline procedures and standards including:

- 10.2.1 who has overall responsibility for safeguarding concerns;
 - 10.2.2 who is responsible for reporting an investigating safeguarding concerns; and
 - 10.2.3 the procedure to be following for dealing with safeguarding concerns.
- 10.3 The Academy will refer to the Charity Commission guidance '*Charities: due diligence, monitoring and verifying the end use of charitable funds*' to carry out due diligence checks on organisations that we provide grant funding to and organisations that we work with to deliver projects.
- 10.4 If a safeguarding report is made to the Academy about a partner organisation, we will contact the partner and will expect them to respond appropriately. We will provide reasonable assistance to the partner.
- 10.5 The Academy will require partner organisations to provide information on the outcome of safeguarding investigations (as permitted under data protection laws). If we have reason to believe that an allegation has not been dealt with appropriately by the partner organisation and/or if the investigation uncovers serious issues relating to the governance or management of the organisation, the Academy may end the partnership and/or cease to fund the organisation.

11 Safer Recruitment

- 11.1 The Academy is committed to the safe recruitment, selection and vetting of staff, trustees and volunteers. The DSL is responsible for ensuring that the recruitment measures set out below are applied rigorously and consistently.
- 11.2 Appropriate checks will be carried out before a new trustee or senior manager is appointed and all trustees must sign a declaration to confirm that the person is not disqualified under the Charity Commission's automatic disqualification rules. Trustees and senior managers in post will be asked to sign a fresh declaration every year.
- 11.3 As part of the recruitment process for all staff and volunteers, the Academy will question gaps in employment, undertake checks to confirm that the individual has the right to work or volunteer in the UK, and take up two references for successful candidates. We will seek to have an open and measured discussion with applicants at interview about any offences or other matters that might be relevant to the position applied for. Failure to reveal information (including information about convictions and cautions) directly relevant to a position could lead to withdrawal of an offer of employment, or termination where employment has already commenced.
- 11.4 The Academy will ensure that it carries out appropriate criminal records checks for anyone working with children and/or adults at risk, in accordance with the Academy's Handling of DBS Certificate Information policy.
- 11.5 Where a criminal record check is required for a trustee, member of staff or volunteer from overseas, the Academy will follow its Handling of DBS Certificate Information policy and the UK Home Office guidance '*Criminal records checks for overseas applicants*'.

Recruitment of ex-offenders: discussing convictions and cautions

- 11.6 The Academy ensures that all those in the organisation who are involved in recruitment have been suitably trained to identify and assess the relevance and circumstances of offences.
- 11.7 At interview, or in a separate discussion, we will 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.
- 11.8 The Academy will discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

12 Operating Online

- 12.1 The Academy recognises that operating online carries specific safeguarding risks connected to protecting children from abuse and protecting sensitive information. We have in place measures to manage these risks, including:
 - 12.1.1 ensuring that all content on our website and/or social media accounts is suitable for the Academy and its service users;
 - 12.1.2 limiting the number of people who are authorised to edit or post information on our website and social media accounts and changing passwords regularly;
 - 12.1.3 having controls on our social media accounts limiting who can post comments;
 - 12.1.4 monitoring what people do, say and share when using our online services;
 - 12.1.5 having in place policies and training for staff on keeping themselves safe online; and
 - 12.1.6 clearly explaining how users can report online concerns.
- 12.2 The Academy will have regard to the Charity Commission guidance '*Charities and social media*'.

13 Contacts

Royal Borough of Kensington & Chelsea (**RBKC**) safeguarding helpline - 020 7361 3013 (office hours); 020 7361 3013 (out-of-hours)

RBKC social services - socialservices@rbkc.gov.uk

RBKC Local Safeguarding Children Partnership - <https://www.rbkc.gov.uk/lscp/>

NSPCC Helpline - 0800 800 5000

Childline - 0800 1111

Protect whistleblowing helpline - 020 3117 2520

We are committed to reviewing our policy and good practice annually. Document management information can be found at the top of this document.

Name:

Signed:

Role:

Date: