



# FESTIVE POLICY AND PROCEDURES FOR SAFEGUARDING YOUNG PEOPLE AND ADULTS AT RISK

Festive's Safeguarding component parts are made up of:

- Festive Policy and Procedures for Safeguarding (*this document*)
- Festive Staff Code of Conduct (*separate document*)

This documentation is developed in conjunction with Scripture Union and with *thirtyone:eight*.

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## Festive Policy and Procedures for Safeguarding

### A. Policy Statement

1. Festive is an organisation made up of volunteers and paid staff. We believe that all human beings are of equal worth in the sight of God and aim to follow Biblical principles in all that we do.

Therefore:

- 1.1 We commit ourselves to the nurture, protection, and general welfare of all, especially children and young people. In so doing, we will work, in partnership, as appropriate, with parents, carers, statutory agencies and other organisations.
- 1.2 It is the responsibility of each one of us to protect children and adults at risk of harm from all forms of abuse and to report any disclosures of abuse in addition to suspicions or concerns.
- 1.3 In order to achieve this, we are committed to supporting, resourcing and training those who work with children and adults at risk of harm. We will provide appropriate supervision and recognise mutual accountability.
- 1.4 Festive works specifically with students in Sixth Form and Further Education. As a result, we tend to work mainly with young people aged 16-18. Some of the young people we work with are therefore aged 18 and so not subject to the same safeguarding requirements as those under 18. Festive however operates under the presumption that all students it is dealing with could be aged under 18 and without verifiable information to the contrary it treats all students it interacts with as young people and as covered by the contents of this policy. Some students who we support who are 18+ may also be classified as adults at risk and will be therefore also covered by this policy.

All volunteers and staff are given access to and expected to follow the procedures and guidelines as set out in this document and in the associated code of conduct.

### B. Statutory Compliance for Festive

2. The standards in this policy build on and incorporate legislation and government expectations for children and adults at risk of harm. This includes HM Government 'Working Together to Safeguard Children (2015)' and new safeguarding duties under the Care Act 2014. The guidance is for statutory agencies and voluntary organisations alike and covers all the expectations of government in relation to safeguarding young people in England.
  - 2.1 **Adopt a policy statement on safeguarding the welfare of young people and vulnerable adults**
    - 2.1.1 The policy statement included in this document has been adopted following approval by the Trustees of Festive. It is reviewed annually along with the policy and is available on request for public transparency.
  - 2.2 **Plan the work of the organisation so as to minimise situations where the abuse of may occur**
    - 2.2.1 We have established and will maintain and review clear procedures to fulfil this policy. They are set out in detail in this document and in our staff code of conduct and are under constant review, with any updates necessary recorded in writing.
  - 2.3 **Apply agreed procedures for protecting young people and vulnerable adults to all paid staff and volunteers.**
    - 2.3.1 We have established minimum procedures for all workers, and training and comprehensive procedures for workers in direct contact with young people and vulnerable adults. All workers are given access to a copy of the policy.
  - 2.4 **Give all staff and volunteers clear roles.**
    - 2.4.1 All paid staff have a written job description, and all volunteers are given a clear written role profile.

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### **2.5 Use supervision as a means of creating a safeguarding culture across the organisation.**

- 2.5.1 All workers review their work with the person to whom they are accountable and digital interactions with students are available to scrutiny and accountability across the organisation.

### **2.6 Treat all would-be paid staff and volunteers as job applicants for any position involving contact with young people.**

- 2.6.1 We have comprehensive application and selection procedures for all workers that operates under the principles of safer recruitment.

### **2.7 Gain a reference from people who have experience of the applicant's paid work or volunteering with young people/vulnerable adults.**

- 2.7.1 We require two references (church leaders or equivalent) for each applicant (paid and volunteer), seeking information which includes character and relationship assessment. We inform referees if work involves direct contact with young people/vulnerable adults.
- 2.7.2 We appreciate that some of our volunteers are young adults wanting to begin work with young people, and therefore it may not be possible to gain references which relate to relevant experience. However, young leaders may be able to get a good character reference from a teacher or church leader etc.

### **2.8 Explore all applicants' experience of working or contact with young people before appointment.**

- 2.8.1 All staff, and volunteers for positions, are interviewed prior to appointment. For volunteers, this interview may be more informal in nature, but the date of this interview is kept on record.

### **2.9 Find out whether an applicant has any conviction for criminal offences against young people/vulnerable adults.**

- 2.9.1 All workers are required to sign a declaration disclosing a criminal conviction or caution. Annual short-term volunteers with young people are required to do so annually. This includes, subject to certain exceptions, disclosing convictions which for other purposes are 'spent', as posts involving direct work with young people are exempt from the provision of section 4(ii) of the Rehabilitation of Offenders Act 1974 (Exemptions Order 1975). Under DBS filtering rules there are some exceptions to this legislation, and we will provide applicants with a copy of the filtering guide so that they can determine whether a conviction, caution, reprimand, or warning should be disclosed.
- 2.9.2 Applicants for roles involving regulated activity are required to apply for an Enhanced Disclosure from the Disclosure and Barring Service.

### **2.10 Make paid and voluntary appointments conditional on the successful completion of a probationary period.**

- 2.10.1 Staff and volunteers are given an initial probation period before confirmed in their role. During this time their access to young people digitally will be more closely monitored and they will be supervised in any direct contact with young people.

### **2.11 Issue guidelines on how to deal with a disclosure and/or suspicion of abuse.**

- 2.11.1 Comprehensive guidelines are established. They are made available in a written format to all staff and volunteers in the staff code of conduct and those dealing directly with young people are given training in them. See APPENDIX A for a flow chart on process. Responsibility for ensuring they are implemented and reviewed lies with the Director and Trustees.

### **2.12 Train paid staff and volunteers, their line managers or supervisors, and policy makers.**

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- 2.12.1 We provide and give access to training for the safe care of young people, including increasing understanding of the prevalence of abuse, along with the signs, symptoms and indicators of abuse.

### 2.13 Keep records of safeguarding concerns.

- 2.13.1 Records are made by the safeguarding lead and stored on a secure online cloud storage (OneDrive) with each file password protected. Access to this file is limited to the safeguarding lead and the trustee(s) with oversight for safeguarding. Records are created, retained and stored in line with official guidance see:

<https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines.pdf>

## C. Safer Recruitment

### 3. Recruitment process

- 3.1 Our recruitment process for both staff and volunteers is largely the same. This includes:
- 3.2 If role is advertised, then the advert will include a statement on Festive's commitment to safeguarding and if the role is subject to a DBS check.
- 3.3 Job description and associated information provided to candidate to include further information about Festive's commitment to safeguarding and a link to this policy.
- 3.4 Application form for all paid staff and an information form for volunteers to be completed so Festive has necessary personal and identifiable details on each staff member and to aid the selection process in paid roles.
- 3.5 An appropriate interview process for both paid and volunteer staff with the date and time of this interview will be recorded.
- 3.6 Two references taken up for successful candidates before they start any student facing/contact part to their role.
- 3.7 Voluntary disclosure made by successful candidate and enhanced DBS check where needed (see below)
- 3.8 Successful applicant signs off on staff or volunteer contract(s) which lay out expectations of the role and their responsibilities around safeguarding.
- 3.9 All successful applicants will receive basic training, safeguarding training (depending on role) and induction so they are properly prepared for the role.

### 4. DBS checks

- 4.1 All those who seek employment with Festive as paid staff or volunteers and whose work is likely to involve regulated activity with young people are required to apply for an Enhanced Disclosure from the Disclosure and Barring Service (DBS).
- 4.2 Trustees of Festive are required to apply for an Enhanced Disclosure. On appointment, Trustees' DBS checks will be carried out every three years thereafter.
- 4.3 Some staff in key managerial positions (where there is a responsibility for the selection or supervision of those working with young people) are also required to apply for an Enhanced Disclosure.
- 4.4 Those with criminal convictions, cautions, cases pending, reprimands or bindovers are not necessarily unable to take up positions with Festive. See our policy on recruiting those with a criminal record.
- 4.5 Festive has a partnership agreement with Scripture Union and processes its DBS checks through them and their Registered Body (currently Atlantic Data).

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- 4.6** All staff and volunteers working with young people are required to apply for Enhanced Disclosures on appointment and every three years thereafter.
- 4.7** Other members of staff who are not normally working with young people as part of their duties but who subsequently join a short-term team are at that point asked to apply for an Enhanced Disclosure.
- 4.8** Other staff whose work involves contact with young people or in supervisory or selection roles of those working with young people are also required to apply for an Enhanced Disclosure at the time of appointment.
- 4.9** Job applicants are advised of the need for an Enhanced Disclosure before an application is submitted.
- 4.10** Specifically assigned members of the staff team carry out verification of identity of prospective staff and processing of staff and volunteer applications for Enhanced Disclosures.
- 4.11** Where an individual has registered a disclosure certificate with the DBS update service, Festive will accept registered disclosure certificates that comply with the following criteria:
- 4.11.1 The disclosure is for the 'Child Workforce' category and
  - 4.11.2 It is an 'Enhanced Disclosure'.
- 4.12** Where the online disclosure check contains information about cautions, convictions, reprimands or warnings or other relevant information the procedure below on handling disclosure information will be followed.
- 5. Handling Disclosure Information**
- 5.1** If a Disclosure contains information about cautions, convictions, reprimands or warnings or other relevant information, advice on how to proceed is sought by the assigned staff member from the safeguarding lead (normally the director) and also if necessary from *thirtyone:eight*. Where advice is sought from a third party the candidates personal and identifiable details (e.g., name) are not disclosed.
- 5.2** Information recorded on the Disclosure is only shared if it is likely to affect the employment decision.
- 5.3** If additional information is received from a police force, action follows the procedure outlined in the letter and is not shared with the applicant or anyone other than those making the employment decision, and only with those people if the police letter received does not forbid it.
- 5.4** The date and disclosure number of all checks are recorded in Festive's DBS system.
- 5.5** In extreme circumstances, when a disclosure check has not been successfully completed prior to the start of an event or role, and the individual is not registered with the update service, a risk assessment must be completed to determine what role, if any, that individual may take. That risk assessment must be signed off by the Director.
- 6. Renewal of Disclosures**
- 6.1** Disclosures are renewed on a rolling three-year basis.
- 6.2** For disclosures that are registered with the update service these will also be checked on a rolling 3-year basis.
- 6.3** If, in the intervening years, declarations completed by those working with young people suggest changed circumstances, a new Enhanced Disclosure is requested.

### **D. Student support work – digital contact with young people.**

#### **7. Overview**

- 7.1** Festive's primary method of interaction and contact with young people is digital. This includes emails, SMS messages, social media and occasional video conferencing for training purposes. With the exception of the video conferencing all the other digital mediums involve written communications and do not involve face to face interactions.

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**7.2** Our code of conduct contains specific guidance and rules for staff (this includes volunteer staff) on what safe digital contact with young people looks like. Festive operates under the following principles:

**7.3 Relevant personal information collected from students to help with safeguarding and escalation of concerns.**

7.3.1 When students sign up for regular support digitally with Festive we collect through a signup form the following personal information to ensure we can follow up appropriately on any safeguarding concerns:

*Full name, DOB, College attended, Church attended, email address.*

**7.4 Transparency and accountability are promoted in all our digital communications**

7.4.1 All ongoing email and SMS contact with young people is done through specifically created email accounts. These email accounts are accessible to the rest of the team (all have the same password) and correspondence are spot checked regularly. As laid out in our code of conduct other forms of communication from personal emails, phone or social media are prohibited.

7.4.2 Any emails sent to students using other Festive email addresses should always be copied to another member of the core staff. Social media accounts and SMS software are accessible and monitored by more than one member of staff.

**7.5 Staff and volunteers are to escalate and report on to their line manager any communications they receive that cause them any concern however trivial.**

7.5.1 This includes questions or information that staff are unsure how to handle, safeguarding concerns or the tone or regularity of correspondence from students.

7.5.2 All staff are trained in what to look out for and instructed in the application of this principle across the organisation through induction training before they start their role.

**7.6 Digital communications whilst personal in feel should be professional in nature.**

7.6.1 The code of conduct sets out guidance in this area covering areas like use of greetings, emojis and sharing or requesting unnecessary personal information.

**7.7 Video conferencing/calls will only be used in centrally approved training settings.**

7.7.1 Video conferencing can be great tool for training but will only be run by a team of staff (never just one staff member) and with the director's approval. A thorough risk assessment must be completed and signed off by the director before the event is run.

**7.8 Contact with young people that has the potential to go beyond the boundaries set out in the code of conduct should be immediately raised with line management and approved before proceeding.**

7.8.1 This includes visits to CUs, colleges or keeping contact with contacts once they leave college.

**7.9 Records of student correspondence and personal information is stored securely.**

7.9.1 As well as GDPR considerations Festive recognises it is important to store student correspondence and personal data securely for safeguarding reasons. Student correspondence over email hosted by Microsoft 365 with only staff having access to email accounts through a password. This password is changed before the beginning of each academic year.

7.9.2 Student records are stored on SharePoint (Office 365) and are only accessible to those with Festive login details. The database also has an additional password on it which is changed at the beginning of each academic year.

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- 7.9.3 Only the personal student information that staff need to do their role is contained on the database. Staff who have moved on from the organisation have their access to 365 removed or email accounts that remain have passwords changed.

### **E. Events run by or attended by Festive involving working with young people**

8. Whilst Festive's primary interactions with young people happen digitally, Festive workers throughout the year may have occasional face to face contact with young people through one of the following:
- Training events run by Festive
  - Recruitment and training of new volunteers who have not yet turned 18.
  - College visits
  - Church/youth group visits
  - Conferences / youth events run by other organisations
  - Events runs by a collaboration of organisations including Festive. An example of this would be Amplify youth event.

#### **8.1 Events run by Festive:**

- 8.1.1 Festive will undergo careful recruitment and selection procedures as stated in this policy. Applicants are appointed (or excluded from service) at the discretion of the Person Responsible and, where appropriate, in communication with other parts of the organisation. Staff or volunteers can be asked to leave an event at any point by the person in charge should their behaviour or presence there cause a safeguarding concern.
- 8.1.2 A 'new applicant' is one who has not worked with Festive before in a role where they have had contact with young people. Staff who have had a break in service of more than one year from this type of contact will also be treated as new applicants unless the event leader indicates that they have remained in sufficiently close contact to be assured that their personal circumstances remain unchanged. A break of two years would mean they would be treated as new applicants without exception.
- 8.1.3 All 'new applicants must complete an application and DBS process in line with Festive safer recruitment procedure laid out in section C.
- 8.1.4 Applicants from overseas or those living in England and Wales for a short time may not be eligible for a Disclosure from the DBS. Every effort will be made to take whatever measures are available according to the comparative methods in their own country, but where there is any doubt as to the availability of a thorough check the application will be refused.
- 8.1.5 It is acknowledged that some team members at events may have little or no experience of working with young people, while others may have plenty. An agreed set of safety guidelines and expectations of team behaviour will be communicated by the leader prior to the event. The team member will also be provided with the code of conduct and access to this policy.
- 8.1.6 Each event will designate an individual, who is appropriately trained to be the safeguarding lead person for the event. Festive's safeguarding policy will be outlined to all team members by that Designated Safeguarding Lead or the overall team leader.
- 8.1.7 All staff working at Festive events will receive the right level of safeguarding training as set out in section E

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- 8.1.8 When working in partnership with other organisations the Festive safeguarding lead will obtain written confirmation that any staff from other organisations working at the event have received the appropriate levels of training, checks and have been recruited safely by the partnering organisation.

### **8.2 Support team**

- 8.2.1 On some events, a few people provide key supporting roles such as catering for the team. If these people are participating in the event on a residential basis they are engaged in regulated activity and, as such, will require an Enhanced Disclosure for the Child Workforce. If they are not participating in the event on a residential basis, they will not require an Enhanced Disclosure check unless it is anticipated that to enable the smooth running of the event they will become engaged in regulated activity

### **8.3 Junior team**

- 8.3.1 Young people who help on an event are sometimes referred to as 'junior team members.' If an event runs a junior team scheme, structured training should be given to this.
- 8.3.2 Junior team members should complete a junior team application form which includes any health issues and parental consent.
- 8.3.3 Those under 18 are not permitted to have unsupervised responsibility for the care of young people on an event.

### **8.4 Recruitment and training of new volunteers who have not yet turned 18.**

- 8.4.1 Where possible staff should wait till new volunteers for support roles have turned 18 before arranging interviews, phone calls and training. If this is not possible reasonable steps should be taken to ensure parents are made aware of the contact and communications. Training should take place in a public setting (like a coffee shop) and if online there should be another staff member present. Phone calls should be kept to a minimum and email and text communication used instead. Staff training volunteers aged under 18 should have the right level of training as set out in Section E
- 8.4.2 If any new volunteers who are under 18 are attending team training events or staff days, then a risk assessment should be drawn up for this and the volunteer in question assigned someone to supervise them from the staff team during the event. This should be a staff member who has sufficient safeguarding training and an enhanced DBS certificate. Others attending the event should be informed beforehand of the attendance of someone under 18 and the event organiser should be aware of this dynamic to avoid putting the young person or staff there in a situation that is against good safeguarding practice.

### **8.5 Attending locations and events where young people are present.**

- 8.5.1 *E.g., College visits, church or youth group visits, events and conferences*
- 8.5.2 Any staff attending locations or events where young people will be present should...
- 8.5.3 Have undergone Festive safer recruitment process including an enhanced DBS check.
- 8.5.4 Received suitable safeguarding training (see section E)
- 8.5.5 Avoid situations where they might find themselves in private and/or unsupervised settings with young people.
- 8.5.6 Know who to contact at the event should they have any safeguarding concerns or receive a disclosure.
- 8.5.7 Follow Festive's code of conduct regarding ongoing contact with any young people they meet and any exceptions to this agreed with Festive's director.
- 8.5.8 Report any incidents or concerns to their Festive line manager.



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- 8.5.9 In extreme circumstance Festive workers will have the freedom to leave an event or location should they feel it is unsafe from a safeguarding point of view. This should be done in consultation with their line manager where possible.
- 8.5.10 In case of Amplify or events run in partnership with other organisations staff and volunteers should operate under the safeguarding policy and procedures agreed by those running the event. In the case of Amplify this is Scripture Union's policy and procedures.

### **F. Training**

#### **9. Training schedule**

Festive works to ensure that all staff and those working with the charity in any setting are trained to an appropriate level in safeguarding for the role they are undertaking.

The training provided for each role is set out below:

##### **9.1 Volunteers and staff with no regular direct contact with young people**

- 9.1.1 In-house induction training

##### **9.2 Volunteers and staff with digital contact and in person contact with young people**

- 9.2.1 In-house induction training for the role
- 9.2.2 'Safeguarding 16–25-year-old training' – online e-learning course run by NSPCC

##### **9.3 Trustees of Festive**

- 9.3.1 'Trustee safeguarding training' – online e-learning course run by NSPCC

##### **9.4 Safeguarding lead**

- 9.4.1 In-house induction training
- 9.4.2 If no previous safeguarding training - 'Safeguarding 16–25-year-old training' – online e-learning course run by NSPCC
- 9.4.3 Safeguarding lead/coordinator training – provided by *thirtyone:eight*
- 9.4.4 'Safer recruitment training' – online e-learning course run by NSPCC

##### **9.5 Trustee in charge of safeguarding**

- 9.5.1 If no previous safeguarding training - 'Safeguarding 16–25-year-old training' – online e-learning course run by NSPCC
- 9.5.2 Safeguarding lead/coordinator training – provided by *thirtyone:eight*
- 9.5.3 'Safer recruitment training' – online e-learning course run by NSPCC

#### **10. Other training considerations**

##### **10.1 Certification**

- 10.1.1 Copies of certificates from training should be sent to Festive admin for filing.

##### **10.2 Refresher training**

- 10.2.1 All Festive staff, volunteers and trustees should receive refresher training every three years.

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### 10.3 Crediting existing training

- 10.3.1 If staff, volunteers or trustees have received relevant safeguarding training in other roles or work this may be accepted as sufficient providing they have:
- 10.3.2 A certificate showing completion of the training
- 10.3.3 The training was delivered by a registered or recognised body (e.g., CPD)
- 10.3.4 The training is judged by the director to be at the same level to what they would have received through Festive
- 10.3.5 The training was completed within the last two years.

## G. Key points for staff and volunteers

### 11.

- 11.1 All those working with young people/vulnerable adults on behalf of Festive will treat them with respect and dignity, which should be reflected in attitude, behaviour and speech.
- 11.2 Festive accepts a duty of care for young people/vulnerable adults at risk of harm booking onto a Festive event.
- 11.3 Teams on mixed events will include male and female members, and organisation of activities within the events will reflect this balance wherever possible.
- 11.4 Festive teams at events will aim to work in groups and in public areas so that contact between participants and team is in sight of others.
- 11.5 Staff/volunteers will avoid forming exclusive relationships or those which could be seen as showing favouritism to individual participants.
- 11.6 Wherever a staff member or volunteer finds themselves involved in communication with a young person/vulnerable adult in person or over email and the young person/vulnerable adult starts to share things that could have safeguarding implications, they should seek to involve their line manager or if they are not available another senior member of staff at an early stage. Promises of confidentiality will be avoided and items shared with line management. Festive operates a “if in doubt - escalate it” policy.
- 11.7 It is normally inappropriate for adults to initiate physical contact with participants, and team members should be cautious of contact initiated by participants, except in exceptional circumstances such as the need for medical attention or to prevent harm.
- 11.8 The use of any corporal punishment is strictly prohibited i.e., any form of physical discipline is not acceptable.
- 11.9 Any physical contact with young people/vulnerable adults in the area of discipline will be purely in terms of an intervention which prevents the one exercising violent, or other inappropriate, behaviour from hurting themselves or others. Minimal force will be used, for the minimum time necessary, and witnessed by another team member.
- 11.10 If it is necessary to send a young person/vulnerable adult home from an event early, they will either be collected by a parent/guardian/carer or accompanied home so that the responsibility for their welfare is clearly transferred, unless other arrangements are agreed with the young person/vulnerable adult’s parents/carers ideally in writing e.g., email.
- 11.11 On residential events, the Designated Safeguarding Lead is responsible for establishing the detailed protocol regarding any access required to young people’s sleeping accommodation by team members. They will take into consideration the commitment to the protection and general welfare of young people, the specific features of the event’s setting and the whole of this Code of Conduct.
- 11.12 Team leaders and members are in a ‘relationship of trust’ with participants and must take care that an abuse of that trust does not occur. Any behaviour which might allow an inappropriate relationship to develop between a person in a position of trust and the individual(s) in their care must be avoided.

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- 11.13** This relationship of trust is also in place in any communication between staff/volunteers and young people/vulnerable adults, whether in person, by letter, email, telephone, text messaging or any other means. Any communication or direct contact with young people/vulnerable adults will therefore be characterised by transparency and integrity and must operate within Festive's policy on safeguarding and its staff code of conduct.
- 11.14** For those staff and volunteers working as student engagement workers for Festive and engaging in regular email or text contact further training is provided and additional information on the application of this policy is found in Festive's staff and volunteer code of conduct.

### H. Understanding Abuse and Neglect (Young people)

#### What is abuse and neglect?

#### 12. ENGLAND

The four definitions of abuse below operate in England based on the government guidance 'Working Together to Safeguard Young people (2018)'.

#### 12.1 What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Young people may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another child or young people.

##### 12.1.1 Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

##### 12.1.2 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

- 12.1.3** It may involve conveying to young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young people. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

##### 12.1.4 Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual

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activities, encouraging young people to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people.

### **12.1.5 Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- 12.1.5.1 provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- 12.1.5.2 protect a child from physical and emotional harm or danger;
- 12.1.5.3 ensure adequate supervision (including the use of inadequate caregivers); or
- 12.1.5.4 ensure access to appropriate medical care or treatment.
- 12.1.5.5 It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **12.1.6 Spiritual abuse**

Linked with emotional abuse, spiritual abuse could be defined as an abuse of power, often done in the name of God or religion, which involves manipulating or coercing someone into thinking, saying or doing things without respecting their right to choose for themselves. Some indicators of spiritual abuse might be a leader who is intimidating and imposes his/her will on other people, perhaps threatening dire consequences or the wrath of God if disobeyed. He or she may say that God has revealed certain things to them and so they know what is right. Those under their leadership are fearful to challenge or disagree, believing they will lose the leader's (or more seriously God's) acceptance and approval.

## **13. WALES**

**13.1** The following definitions of child abuse are recommended as criteria throughout Wales by the Department of Health, Department for Education and Skills and the Home Office in their joint document, Working Together to Safeguard and Promote the Welfare of Young people (2000).

### **13.1.1 Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This is commonly described using terms such as 'factitious illness by proxy' or 'Munchausen Syndrome by proxy'.

### **13.1.2 Emotional Abuse**

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and continuous adverse effects on the child's emotional development. It may involve conveying to young people that they are worthless or unloved, inadequate or valued only so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on young people. It may involve causing young people to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

### **13.1.3 Sexual Abuse**

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape or buggery) or non-penetrative acts. They may include non-contact activities, such as involving young people in looking at, or in the production of,

## Festive Policy and Procedures for Safeguarding

pornographic material or watching sexual activities, or encouraging young people to behave in sexually inappropriate ways.

### 13.1.4 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## 14. Reporting suspicion of abuse

- 14.1** Whilst working for Festive, staff and volunteers may be told about various personal situations which the young people they are working with have experienced. In the majority of situations, being prepared to give the time to listen and care without being judgmental will be of great value and assistance. In some cases, it may be possible and appropriate to offer advice and prayer. However, workers and volunteers must understand the importance of safeguarding and understand that it is possible that the nature of our work may increase the likelihood of young people disclosing an issue which puts them 'at risk' or suggest that they have been or are being abused. Such disclosures require more than a caring response and a sympathetic ear, and the following procedure must be followed by the team member:
- 14.2** Give the person time to talk freely but without fear of being overheard. Treat them with respect and acceptance. Always accept what is being said at this stage. Do not ask questions other than to clarify what is being said. Never put words into the person's mouth and be careful with your tone of voice so as not to appear shocked or angry or to show disbelief.
- 14.3** Do not promise to keep the disclosure 'secret'. Explain that you must share this information with the leader of the event who may in turn call upon other people who will be able to help.
- 14.4** Stay with the person until you feel they have said all they want to say. Try to avoid leaving them in a distressed state.
- 14.5** Inform the event's Designated Safeguarding Lead of the disclosure as soon as possible.
- 14.6** Make a written report of what happened as soon as possible (not in the participant's presence). Do not interpret, only record what was said as verbatim as possible.
- 14.7** The above principles are also applicable and transferable to how staff and volunteers handle disclosures received via email or in other digital formats.
- 14.8** Festive is aware that members of its team involved in handling these situations may also need appropriate help throughout the process and afterwards. Counselling support may be appropriate; Festive's director should be contacted regarding this.
- 14.9** Once a disclosure or allegation of abuse is made, Festive is required to take action. The Designated Safeguarding Lead is required to take action consistent with the appended process diagram (appendix A). The advice of our safeguarding advisors (currently Thirty one-eight ) is to be followed.
- 14.10** If contact with the person making the disclosure continues during an event, try to ensure that this is as 'normal' as possible, and avoid drawing attention to the situation or repeatedly referring to it unless the person initiates further discussion. If the disclosure is received digitally then correspondence can continue as normal but with guidance from the Safeguarding lead.
- 14.11** If an allegation is made against any member of Festive's staff or volunteer team, the same process must be followed except that it must exclude the individual who is the subject of the allegation. The team member or leader will normally be asked to leave the event or role immediately until the investigation has been carried out. It cannot, though, be assumed that this is the course of action which it will be required to be followed in every circumstance.
- 14.12** Any staff member or volunteer who is concerned about the way an allegation or disclosure has been handled will contact the Chair of Trustees.

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- 14.13** At every stage, procedures will show respect for people and will involve careful consultation, not hasty reaction.

### G. Understanding Abuse and Neglect (Adults at risk)

- 15.** As stated in our policy statement we assume all students we have contact with are under 18 without verifiable information to the contrary. In some rare cases however Festive may have communication or contact with a student who is aged 18 or over (mature student) and who may be classed as an 'adult at risk'. The primary digital nature of our communications with students means we won't always know if students are 'adults at risk' and so Festive's policy is to consider any mature student a potential 'adult at risk'.

#### **15.1 What is abuse and neglect**

- 15.1.1 "Abuse is a violation of an individual's human and civil rights by any other person or persons" (No Secrets: Department of Health, 2000)

#### **15.2 Abuse includes:**

- 15.2.1 physical abuse: including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint.
- 15.2.2 sexual abuse: including rape, indecent assault, inappropriate touching, exposure to pornographic material.
- 15.2.3 psychological or emotional abuse: including belittling, name calling, threats of harm, intimidation, isolation.
- 15.2.4 financial or material abuse: including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits.
- 15.2.5 neglect and acts of omission: including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs.
- 15.2.6 discriminatory abuse: including racist, sexist, that based on a person's disability and other forms of harassment, slurs or similar treatment.
- 15.2.7 institutional or organisational: including regimented routines and cultures, unsafe practices, lack of person-centered care or treatment.

- 15.3 Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts.**

#### **15.4 People who behave abusively come from all backgrounds and walks of life.**

- 15.4.1 They may be doctors, nurses, social workers, advocates, staff members, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

#### **15.5 Report suspicions of abuse**

How to respond if you receive an allegation:

- 15.5.1 Reassure the person concerned
- 15.5.2 Listen to what they are saying
- 15.5.3 Record what you have been told/witnessed as soon as possible
- 15.5.4 Remain calm and do not show shock or disbelief
- 15.5.5 Tell them that the information will be treated seriously
- 15.5.6 Don't start to investigate or ask detailed or probing questions
- 15.5.7 Don't promise to keep it a secret

#### **15.6 If you witness abuse or abuse has just taken place the priorities will be:**

- 15.6.1 To call an ambulance if required

## **Festive Policy and Procedures for Safeguarding**

- 15.6.2 To call the police if a crime has been committed
- 15.6.3 To preserve evidence
- 15.6.4 To keep yourself, staff, volunteers and service users safe
- 15.6.5 To inform the Designated Named Person in your organisation
- 15.6.6 To record what happened
- 15.6.7 All situations of abuse or alleged abuse will be discussed with the Director and safeguarding lead trustee. If a trustee, staff member or volunteer feels unable to raise this concern with the Director/trustee then concerns can be raised directly with Adult Social Care Direct. The alleged victim will be told that this will happen. This stage is called the alert.
- 15.6.8 If it is appropriate and there is consent from the individual, or there is a good reason to override consent, such as risk to others, a referral (alert) will be made to Adult Social Care Direct team.
- 15.6.9 If the individual experiencing abuse does not have capacity to consent a referral will be made without that person's consent, in their best interests.
- 15.6.10 The Designated Named Person may take advice at the above stage from Adult Social Care Direct and/or the Safeguarding Adults Unit and/or other advice giving organisations such as Police.

### **Contact**

#### **Adult Social Care Direct / Police**

Look up the local area number of social services or police depending on area person involved lives.

## **H. Responsibilities**

The Board of Trustees is responsible for the approval of Festive's safeguarding policy.

Joshua Kendall is the designated lead person for safeguarding with Alex Forrest acting as deputy in this role.

A named member of the Leadership Team (currently the Director) is the operational lead for safeguarding matters and for reporting, as necessary, individuals to the DBS. Day to day delegation of tasks may be delegated to the Finance and Admin worker who has responsibility for processing DBS checks.

Each Festive event will have a named and appropriately trained safeguarding lead.

The Festive Director is responsible for reporting notifiable cases to the Charity Commission.

## Festive Policy and Procedures for Safeguarding

### Definitions

|  |  |
|--|--|
| <b>Adult at risk of harm</b>             | A person who is aged 18 or over and who has care and support needs as defined by the Care Act 2014   |
| <b>Child/Young person</b>                | Anyone under the age of 18   |
| <b>DBS</b>                               | Disclosure and Barring Service (formerly CRB – Criminal Records Bureau)  |
| <b>DBS Processing Team (DPT)</b>         | Festive staff authorised to process online DBS applications.   |
| <b>Designated Safeguarding Lead</b>      | The appropriately trained person who is the designated lead for safeguarding on an event.  |
| <b>Event</b>                             | Any event where Festive takes responsibility for participants who are under the age of 18 years.   |
| <b>First Aider</b>                       | Person with current, appropriate qualification to administer first aid.  |
| <b>Junior Team</b>                       | Those younger than 18 who may assist on an event but who will not have unsupervised responsibility for, or undertake regulated activity with, anyone under the age of 18 years.  |
| <b>Leaders</b>                           | People who have been given overall responsibility for an event through an appointment procedure.   |
| <b>Participants</b>                      | Those who attend an event.   |
| <b>Person Designated for Emergencies</b> | The person on duty for emergency cover (including out of hours), who will usually be one of the above or the Director of Ministry Development or Associates Co-ordinator.  |
| <b>Person Responsible</b>                | Normally this will be one of the following, the nature and leadership of the event determining which: <ul style="list-style-type: none"><li>• Volunteer Ministry Leader</li><li>• Volunteers' Coordinator</li><li>• Regional Team Leaders and other Regional Staff.</li></ul>  |
| <b>Regulated Activity</b>                | 'Regulated Activity' (as defined by the Protection of Freedoms Act, 2012) involving a substantial degree of contact with young people including unsupervised activities such as teaching, supervising, training or providing advice/guidance on well-being (this applies to most people working with, or responsible for, young people in a church situation, including the Church Leader, Pastor, Minister, Vicar). |
| <b>Staff or Team</b>                     | Leaders, staff members including volunteers.   |
| <b>Team members</b>                      | Others over the age of 18 who are involved in the event.   |
| <b>Workers</b>                           | Anyone engaged in Festive's ministries, either as employees or volunteers.   |

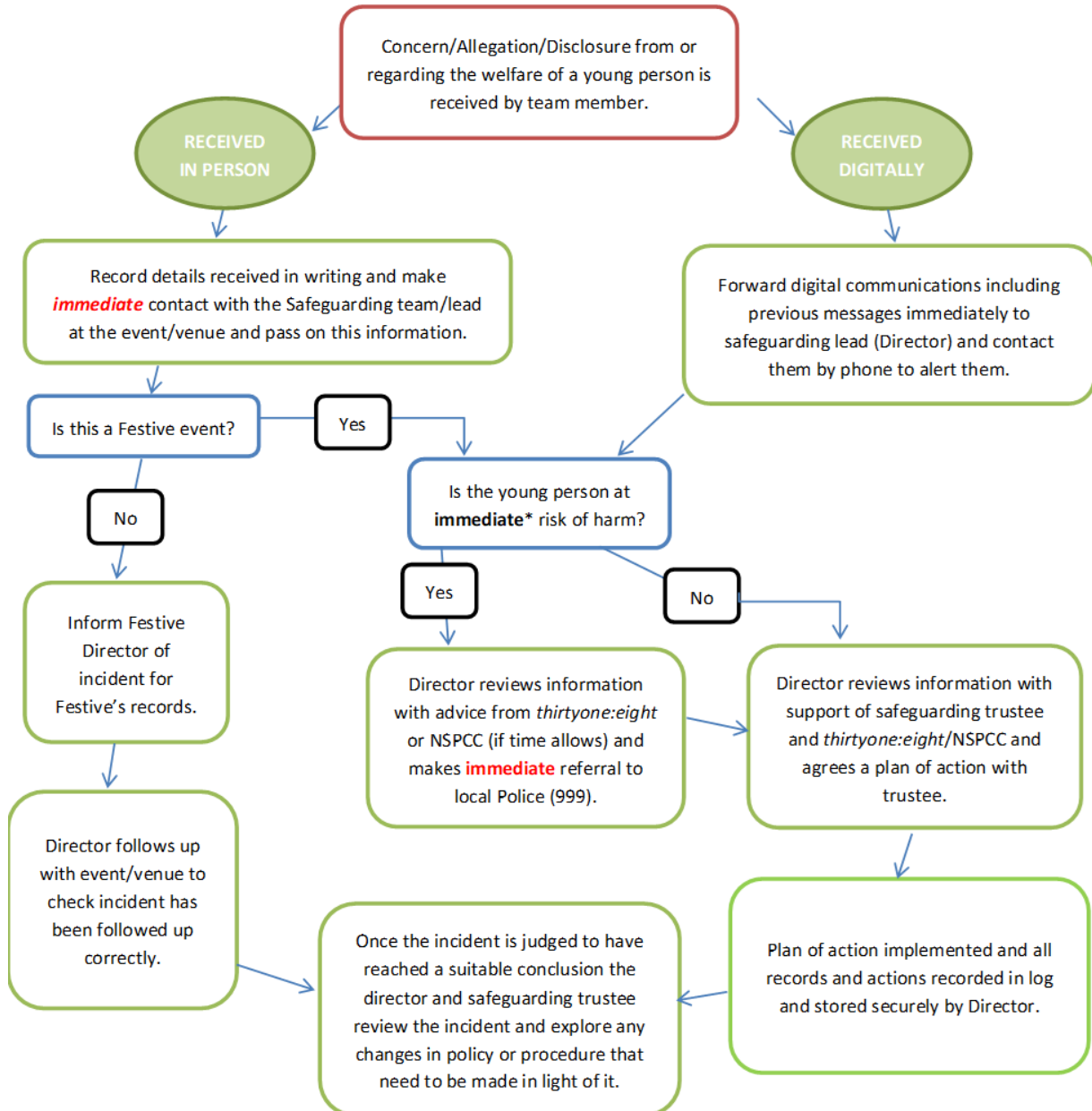


## Festive Policy and Procedures for Safeguarding

### APPENDIX A: Reporting Information Concerning the Welfare and Protection of a Child

## FLOWCHART FOR REPORTING INFORMATION CONCERNING THE WELFARE AND PROTECTION OF A YOUNG PERSON

Note: This may relate to a welfare concern occurring at an event, including the actions of young people or adults or a concern regarding the welfare of a young person outside of an event received through digital communication.



\***immediate** is used to describe any situation where if the child were to remain in their current environment there would be an ongoing risk of harm (i.e. posed by another person with whom they have contact). This also applies if a child were to leave or be taken from the environment by a person who may cause them harm. If the director cannot be contacted one of the safeguarding trustees should be contacted instead.

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### APPENDIX B: USEFUL CONTACTS

|   |                 |                         |
|---|-----------------|-------------------------|
| <b>Festive Director and Safeguarding lead</b> | Pete Carrington | 07825 508 772           |
| <b>Festive Chair of Trustees</b>              | Pauline Kendall | 07837 991 794           |
| <b>Trustee in charge of safeguarding</b>      | Joshua Kendall  | 07581 710 277           |
| <b>Trustee safeguarding deputy</b>            | Alex Forrest    | alexforrest97@gmail.com |

*thirtyone:eight* helpline: Tel: 0303 003 11 11

NSPCC helpline: Tel: 0808 800 5000

Or online contact form: <https://www.nspcc.org.uk/keeping-children-safe/our-services/nspcc-helpline/>

Non-Emergency NHS Tel: 111