

**Safeguarding Policy of Leges Support Community Interest Company trading
as SO Support (“the Community Interest Company”)**

1. Preliminary

- 1.1 The Office of the Regulator of Community Interest Company has stated that safeguarding should be a key governance priority for all organisations, regardless of size, type, or income, *not just those charities working with children or vulnerable adults*. It has also stated that it is essential for Community Interest Company members to have and implement safeguarding policies and procedures and that they have to be adequate and appropriate for the Community Interest Company's particular circumstances.
- 1.2 This Policy applies to all staff and volunteers of the Community Interest Company. In this Policy, “volunteers” means and includes the Community Interest Company's members and all other volunteers.

2. Commitment to safeguarding

- 2.1 Those who receive services provided by the Community Interest Company or are beneficiaries of the Community Interest Company or who come onto the Community Interest Company's premises are referred to in this Policy as its Service Users.
- 2.2 Service Users may be at risk due to age, illness or disability. The Community Interest Company is committed to working in their interests, to promote their welfare, and to put in place safeguards and measures to protect them. In providing services and activities] for Service Users, the Community Interest Company will endeavour at all times to minimise risk to them and to ensure that they are as safe as the Community Interest Company can make them.
- 2.3 The Community Interest Company aims to protect all of its Service Users from any act or behaviour of any member of staff or volunteer which, whether deliberately or unknowingly on the part of that member of staff or volunteer, gives rise to harm or ill treatment.
- 2.4 Such harm or ill treatment includes abuse (physical, sexual, emotional, discriminatory, institutional or organisational, financial or material), neglect, or impairment of the health or development of the Community Interest Company's Service Users.
- 2.5 The Community Interest Company also aims to ensure the provision to them of safe and effective care and to promote the well-being and welfare of its Service Users.
- 2.6 The Community Interest Company recognises that it has a duty to act on reports or suspicions of abuse or neglect. It adopts a “zero-tolerance” policy of abuse within the Community Interest Company.

2.7 The Community Interest Company maintains a Safe Working Practice Guidance. It includes:

(1) details about when and how risk assessments for:

a) volunteering roles; and

b) particular circumstances or activities

should be carried out.

(2) guidance on use of ICT related activities such as use of social media, email and internet.

The Community Interest Company will ensure that the Guidance is implemented by all within the Community Interest Company and, for that purpose, it will ensure that its staff and volunteers have read and understood it.

2.8 The Community Interest Company will work in partnership with local / national agencies to put in place appropriate procedures for reporting, making referrals, and accessing training and specialist support, as and when required.

3. Safe recruitment

3.1 To aim to protect its Service Users, the Community Interest Company will seek to recruit staff and volunteers using appropriate procedures, safeguards and checks.

3.2 The Community Interest Company will take up at least two references for all staff posts and volunteer roles prior to appointment.

3.3 The Community Interest Company will provide an induction programme for all new volunteers and staff, and appropriate training and ongoing/refresher training for them at regular intervals, to enable all volunteers and staff to undertake their roles safely, effectively and confidently. The induction will make it clear to them that they have an obligation to implement this Policy and to learn about protection issues and their related responsibilities.

3.4 Where the Community Interest Company should do so, it will use the Disclosure & Barring Service ("DBS") checks to help it to assess suitability of a candidate for a particular volunteer or staff role which is treated by the DBS as Regulated Activity and is therefore subject to a barring list check. In relation to a post or role which is eligible for an enhanced DBS check, where it considers it appropriate it will carry out an enhanced DBS check. The Community Interest Company will assess any criminal record information that is disclosed in line with its data protection and equalities (treating ex-offenders fairly) policies.

3.5 The Community Interest Company will regularly review its recruitment and other human resources procedures in response to changes in

legislation and systems external to the Community Interest Company, e.g. DBS and barring list checks.

4. Volunteers

- 4.1 All volunteer roles will be supported by a Volunteer Co-ordinator /Supporter.
- 4.2 Volunteers will be treated equally alongside paid staff, and all volunteers will be offered the same opportunities for advancement, responsibility, training and gaining qualifications, and acknowledgement for their contribution to the Community Interest Company.
- 4.3 In turn, volunteers will be required to adhere to the applicable parts of the Code of Conduct (Staff and Volunteers) at all times as a representative of the Community Interest Company. Before they take up their role, they will each be given a clear description of the requirements and responsibilities of their role and the member of staff or trustee recruiting them will discuss their role with them, to ensure that they understand what is expected of them.
- 4.4 Any volunteer roles, which would be Regulated Activity if unsupervised, will be appropriately supervised in accordance with statutory guidance.

5. Safeguarding Officer

- 5.1 The Community Interest Company's appointed Safeguarding Officer as from 1st June 2020 is Leylah Honeyborne and they are supported by Alina Guest as Deputy Safeguarding Officer. They will have access to appropriate training to support them in these roles.
- 5.2 They will be available to all staff, volunteers and Service Users to speak to when they have any concerns, issues, or complaints regarding the safety, well-being or conduct of Service Users, volunteers or staff.
- 5.3 The Safeguarding Officer and Deputy Safeguarding Officer will liaise with appropriate local and national agencies, contribute to appropriate policies, maintain records, keep confidentiality, adhere to and promote this Policy within the Community Interest Company, and support or provide access to support for individuals suffering harm or abuse.

6. Awareness of harm and abuse within the Community Interest Company

- 6.1 All incidents of harm to any Service User will require an appropriate response to reduce risks and improve the Community Interest Company's services and activities.
- 6.2 Harm is caused by accidents, deliberate abuse (physical, psychological, sexual, emotional, financial), neglect (deliberate or not) or factors such as bullying, prejudicial attitudes, or a failure to enable a person to participate in activities that are open to most of their peers. It

can also include abuse via use of ICT facilities (e.g. grooming, bullying via the internet).

- 6.3 Deliberate acts of harm (physical, psychological, sexual, emotional and financial) and neglect are abuses against the person. Those acts will incur disciplinary proceedings and require reports and referrals to social services, the police, other professional bodies, and the DBS if the act is by someone in Regulated Activity. If a criminal offence is thought to have been committed by any staff member or volunteer, the police will be informed.

7. Confidentiality

All reports and logs (including personnel records) will be kept securely and confidentially according to the Community Interest Company's Data Protection Policy and Confidentiality Policy or in line with the DBS Code of Practice for Registered Bodies if appropriate, until or unless it is necessary to share this material with the agencies named above. Information will be shared by the Community Interest Company on a "need-to-know" basis only.

8. Reports of possible or actual harm

- 8.1 The Community Interest Company supports and encourages all Service Users, volunteers and staff to promptly speak up and contact the Safeguarding Officer or Deputy Safeguarding Officer where there is a concern (i.e. a worry, issue or doubt about practice or about treatment of a Service User or colleague, or their circumstances), or a disclosure (i.e. information about a person at risk of or suffering from Significant Harm) or an allegation of an incident or a possibility that a volunteer or staff member has caused harm or could cause harm to a person in their care.
- 8.2 Staff or volunteers can report, and have a responsibility to report, something that they become aware of if they suspect or discover that it is not right or is illegal or if it appears to them that someone at work is neglecting their duties, putting someone's health and safety in danger or covering up wrongdoing. They may become aware of any of these things from what they see or hear or from something another person has disclosed to them.
- 8.3 In the first instance the staff or volunteer making a report should speak to their line manager who will then liaise with the Safeguarding Officer, Deputy Safeguarding Officer or the Community Interest Company's member with appropriate responsibility who is Peter Guest. However, if the report implicates their line manager, the staff member or volunteer making the report should instead speak directly to Safeguarding Officer, Deputy Safeguarding Officer or that member.
- 8.4 The Community Interest Company prefers that anyone should use internal processes whenever possible to make a report as above, but

this does not prevent them from making a report or referral, in their own right as a private individual, to statutory agencies such as social services or the police.

- 8.5 The Community Interest Company cannot promise confidentiality to staff or volunteers making an internal report (to the Safeguarding Officer, Deputy Safeguarding Officer, the Community Interest Company's member with appropriate responsibility or their line manager) where it is has to be shared with any statutory agencies.
- 8.6 The Community Interest Company also supports its staff or volunteers to raise concerns or to disclose information, which they believe shows malpractice - whistle-blowing (disclosure in the public interest).

9. Safeguarding Officer's action

Where there is risk of Significant Harm to any Service User, volunteers or staff, the Safeguarding Officer and Deputy Safeguarding Officer have the power to act as necessary and, in particular, as follows:

- log all conversations regarding the issue
- sign and request signatures on reports and statements
- confidentially seek advice from expert sources
- share concerns (with consent where required and appropriate) internally with senior staff / Chair of the Board of Directors
- share concerns and make referrals to external agencies such as social services or the police, as appropriate to the circumstances
- make a referral to the DBS regarding staff or volunteers in Regulated Activity whose conduct is harmful to Service Users and refer them to DBS when they are removed from Regulated Activity.

10. Communication by the Community Interest Company about safeguarding and this Policy

- 10.1 All staff and volunteers have an obligation to learn about protection issues and their related responsibilities.
- 10.2 The Community Interest Company will communicate this Policy (using appropriate methods, formats and language to communicate the substance of it) to all of its staff, volunteers, and Service Users and their families / carers, and it will also make it available to the public. Peter Guest will be responsible to the Board of Directors for communicating this Policy to them.
- 10.3 To encourage everyone involved in the Community Interest Company to understand that safeguarding is the business of everyone, and to assist all staff and volunteers to learn about protection issues and their related responsibilities, the Community Interest Company will hold meetings open to all staff and volunteers about safeguarding and

provide other opportunities for discussion about issues and concerns, policy and procedures to reflect, review and to continue to learn and improve in relation to the Community Interest Company's safeguarding responsibilities.

11. Implementation of this Policy

11.1 This Policy must be followed by all staff and volunteers of the Community Interest Company and must be promoted by all of its trustees and senior staff. Failure to follow it will be treated as a very serious matter.

11.2 This Policy needs to be read in conjunction with the following policies and procedures of the Community Interest Company:

- Safe Working Practice Guidance
- Health & Safety Policy
- Code of Conduct (Staff and Volunteers)
- Data Protection Policy
- Confidentiality Policy
- Equal Rights and Diversity Policy
- Complaints Policy
- Whistle Blowing Policy

12. Adoption, coming into effect, and review, of this Policy

12.1 This Safeguarding Policy was approved by the Board of Directors of Leges Support Community Interest Company trading as SO Support on 1st June 2020. It also comes into force on that date.

12.2 The Board will, as appropriate, monitor and enforce this Policy,

12.3 The Board will revise this Policy from time to time. The next date for review of this Policy by the Board will be 30th May 2021.

Signed by Peter Guest, Executive Director

A handwritten signature in blue ink, appearing to read "Peter Guest".