

Safeguarding Policy for Children, Young People and Adults

Organisation Name: Sponsors for Educational Opportunity (SEO London)

Policy Date

This policy was agreed and disseminated on **1 July 2024** and will be reviewed annually or when there are substantial organisational changes.

Date of next review: 1 July 2025

Signed:

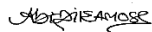


Name: Lead for Safeguarding: Charlotte Tillson

Signed:



Name: Deputy for Safeguarding: Chanelle Francis



Signed:

Name: Senior Lead for Safeguarding: Abigail Moss



Signed:

Name: Lead for Safeguarding for SEO London Board of Trustees: Duncan Perry

Date: 02.07.2024

Context

SEO London is a registered charity, operating from 41 Great Guildford Street, London, SE1 0ES. SEO London supports school children [15-18 years old], undergraduates, graduates and junior professionals and operates across the UK and in Paris,-France as SEO Europe. SEO London's mission is to prepare talented students from underrepresented backgrounds for career success. The charity delivers specialist career-focused education and training programmes. These include in-person events and activities in conjunction with competitive sponsor firms as well as virtual engagement opportunities. In-person events take place primarily at sponsor firm offices or hired event spaces. SEO London is regulated by the Charity Commission and has approximately 70 staff members. Circa 800 volunteers from sponsor firms and from the charity's alumni are engaged annually to contribute toward programme delivery. SEO London delivers programmes to over 3700 children, young people and adults each year.

Statements and Aims

Policy Statement

SEO London recognises that the welfare of all children, young people and adults at risk is paramount and that *all* have equal rights of protection.

Organisations that work or encounter children, young people and/or adults at risk need to have safeguarding policies and procedures in place. All parties have responsibilities for safeguarding; this includes SEO London, its staff, volunteers and partner firms' representatives, carers and/or families. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall into the remit of this policy.

To support our duty of care and responsibilities, SEO London:

- has a lead representative for safeguarding who advises the Board of Trustees
- is clear about peoples' responsibilities and accountability
- has a culture of listening to children, young people and adults at risk
- undertakes safer recruitment practices for all SEO staff and volunteers working with SEO London's children, young people and adults at risk
- has procedures for safeguarding children, young people and adults at risk
- has procedures for dealing with allegations against, and concerns about, any SEO staff or volunteers
- makes sure staff, paid and unpaid, have mandatory induction and further safeguarding training, supervision, reviews and support
- has agreements in place about working with other organisations and agencies

When there are concerns about the welfare of any child, young person or adult at risk, all responsible adults in our organisation are expected to share those concerns, without delay, with the Lead for Safeguarding (or the Deputy, if the Lead is unavailable).

Sponsors for Educational Opportunity (London)

41 Great Guildford Street, London SE1 0ES

T +44 (0) 207 400 0400 W www.seo-london.org

SEO London is a charity limited by guarantee registered in England and Wales: Company no. 04159512; Charity no. 1097832

Our Safeguarding Policy is approved by our board and will be reviewed and updated annually by the internal Safeguarding Leads. We will publish and promote this policy to all staff, paid or unpaid, through induction, training and supervision. We endeavour to disseminate, as appropriate, this policy to all who encounter our organisation e.g. children, young people, adults at risk, their parents, carers, families and others, such as organisational partners and fundraisers.

SEO London aims to comply with all government Prevent Duty Guidance.

Equal Opportunities Statement

We recognise that anyone can become subject to discrimination, harassment, or victimisation, including because of age, culture, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Comments and actions that contribute to discrimination, harassment or victimisation are not acceptable and will be challenged. Where relevant, SEO London will record and share details with relevant agencies.

SEO London will:

- treat everyone with respect and celebrate their achievements
- carefully recruit and select all staff whether paid or unpaid
- respond to concerns and allegations appropriately

Internal Safeguarding Leads

Safeguarding Lead & Deputy

The Safeguarding Lead and Deputy are responsible for overseeing and ensuring full implementation of SEO London's safeguarding standards and policy, which includes eSafety.

Their responsibilities include:

- monitoring and recording concerns
- making referrals to social care, or police, as relevant, without delay
- liaise with other necessary agencies
- arrange training for staff and volunteers of SEO London

Designated Safeguarding Lead: **Charlotte Tillson** Programme Manager: Investment Banking Workstream

Safeguarding Deputy: **Chanelle Francis** Programme Manager: Alternative Investment Programme

Contact details: safeguarding@seo-london.org

Senior Member of Executive team for Safeguarding

Our Safeguarding senior staff lead is **Abigail Moss (Chief Operating Officer)**

Contact details: Abigail.Moss@seo-london.org

Senior Safeguarding representative for SEO London's Board of Trustees

Our Safeguarding representative for our Board of Trustees is **Duncan Perry**

Contact details: c/o Abigail.Moss@seo-london.org

Definitions

Definition of a child/young person

A child or young person is anyone who has not yet reached their 18th birthday (16th in Scotland). A young person may also be considered 16-25 years if they have Special Educational Needs or Disability (SEND) and/or has experience of local authority care.

Definition of an adult at risk

An adult at risk is a person over the age of 18 years and:

- has needs for care and support, and
- is experiencing, or is at risk of, abuse and neglect and
- as a result of those care needs, are unable to protect themselves from either the risk of, or the experience of abuse or neglect

Related Policies

Related documents are SEO London's:

- Data Protection Policy, which relates to the Data Protection Act 2018 (DPA 2018) and UK GDPR
- Employee Code of Conduct*
- Trustee Code of Conduct*
- Volunteer Code of Conduct*
- Participant Code of Conduct*
- Whistleblowing Policy
- Grievance Procedure
- Disciplinary Procedure
- Complaints Procedure
- SEO London guidance and processes around participant and parent consent, permissions and booking of venues

*Our Codes of Conducts include expectations of conduct around use of social media, e-safety and cyber security.

Whistleblowing

Whistleblowing is when someone raises a concern externally about a person or practice within the organisation, which will affect others in an illegal and or harmful way. SEO London promotes the sharing of any concerns regarding the safeguarding of children, young people and adults at risk as soon as possible with the internal Safeguarding Leads Designated Safeguarding Lead (DSL) or Deputy (DDSL).

If individuals reporting their concerns within our organisation do not feel they have been acted upon, or the Lead and/or deputy have been compromised, these concerns can be reported to the Local Authority Designated Office (LADO) (England and Wales only) social care services, the police, and the Charity Commission. SEO London also has a separate and related Whistleblowing Policy – see above.

Safer Recruitment

SEO London is committed to safer recruitment in line with the relevant legislation and guidance from government and the Charity Commission for recruiting all staff, paid or unpaid. Members of our HR team are trained in safer recruitment and attend at least one interview with every candidate and hiring managers introduced to the principles of safer recruitment.

All staff receive a DBS check when they join SEO London and this is renewed every 3 years. All staff working with schools students and all Trustees apply for and receive an Enhanced DBS certificate.

Induction and Training

We have a safeguarding induction and training strategy, clear job/role descriptions and responsibilities as they relate to safeguarding and visible procedures. All new employees, including people working at SEO London on relevant placements, receive safeguarding training as part of onboarding, and sign to record they have:

- received and understood this policy
- been given relevant resources to support their role
- understood SEO London's commitment to safeguarding

Employees undertake further internal and online safeguarding training as required for their role and updated safeguarding training and/or refreshers are offered every 2 years, or less as required.

SEO Staff working directly with at risk groups also undertake government training for PREVENT DUTY Channel and as relevant for FGM.

SEO Mentors and volunteers

All Mentors working with students on our programmes receive group safeguarding training delivered by SEO staff. This is reviewed yearly, and updated training provided to volunteers who continue to work with SEO London. It is accompanied by guidance on how to ensure everyone is kept safe.

Mentors working with young people under 18 years old or known adults at risk can only do so once they have:

- attended a safeguarding training session
- completed SEO London DBS and identification checks which have been signed off

Verification checks include but are not limited to: employment checks, photo ID and/or Disclosure and Barring Service (DBS) checks. These checks are performed in accordance with best practice.

All other volunteers who support SEO London events or activities are under the supervision of an SEO member of staff. Where relevant volunteers receive a summary of safeguarding principles and how to raise concerns.

One-to-one mentoring only happens online or in a public venue and between 8am and 9pm.

Working Practices

Consent and Permissions

When consent is required for any care, activity or intervention we will, unless it is an emergency, obtain consent from the individual if of sufficient age and/or understanding. Consent is requested from parents in relation to our support to under-18s. We collect permissions for photographs and audio and video footage.

Activities, Events and Visiting Speakers/Activity Leaders

We always ensure visitors and activities undertaken are risk assessed and are committed to:

- ensuring that those who run activities have the expertise, knowledge and skills to do so properly
- completing a risk assessment which involves identifying risks and the means of reducing or eliminating those risks
- risk assessing any changes being made to activities or events involving children, young people and adults at risk
- having a written plan in place in case of emergency including contact numbers
- implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis
- having a minimum of **two** responsible SEO staff present for any events.

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Incidents, including during Residential Events

SEO London staff will always attempt to contact the parent and/or nominated contact in an emergency. If this fails, the supervising adult will wait with the child, young person or adult at risk with other staff, volunteers or parents wherever possible.

Our staff are advised to avoid:

- taking the child, young person or adult at risk home or to another location
- waiting alone with the child, young person or adult at risk in a vehicle or at the venue alone
- sending the child or young person home with another person, without [the required parental] consent
- using a personal vehicle to chaperone a child, young person or adult at risk

The internal Safeguarding Lead/s will be informed as soon as possible, and all details and actions recorded following agreed procedure.

Young People who work in our Organisation

All young people undertaking volunteer work, apprenticeships or work experience at SEO London is supported as a member of staff and receive the same duty of care as all other young people we come into contact with. Any disclosures, observations of possible harm or disturbing behaviour should be reported to the Lead or Deputy immediately.

Conduct

We aim to provide a safe environment free from discrimination and upholding and promoting equality, diversity and inclusion. We ask that everyone working for and with SEO London:

- treats all children and young people and adults at risk with respect and dignity
- ensures that their welfare and safety is always paramount
- maintains professional boundaries both face-to-face and in virtual environments
- always listen to individuals and take account of their wishes and feelings
- always act in a professional way and not accept bullying, swearing or other disruptive behaviour
- use the internet and other forms of communication in a sensible and polite way.
- only access websites, send messages or use other resources in such a way that doesn't hurt or upset anybody
- seeks permission if they want to take photographs or audio or video footage of other people

These requirements are included in our Codes of Conduct and guidance – see above.

Responding to safeguarding concerns

We make our Referral Flowchart – see Appendix 1 below - highly visible and accessible to all staff and volunteers, including in our office, in guidance notes, on our intranet and during trainings.

We ask staff and volunteers to:

- listen to, and act upon, any disclosures, allegations or concerns of abuse
- always follow our safeguarding procedures
- not maintain confidentiality if there is a concern about the welfare of a child, young person or adult at risk
- recognise abuse in Children, Young People and Adults at Risk – see Appendix 2 below

Record Keeping

At all times when required and especially where there is a safeguarding concern, SEO London staff and volunteers will:

- record safeguarding incidents safely via our Disclosure form.
- log all incidents via a secure Disclosure Log that is accessible only to the three internal safeguarding leads
- record fact-based details as a true record of:
 - what has been monitored/observed
 - what has been said and by whom
 - what has given cause for concern
 - what action has and/or will be taken including the reason for those actions
 - the reason stated for no action being taken and by whom
- be nonjudgmental
- report in a timely way and within 24 hours

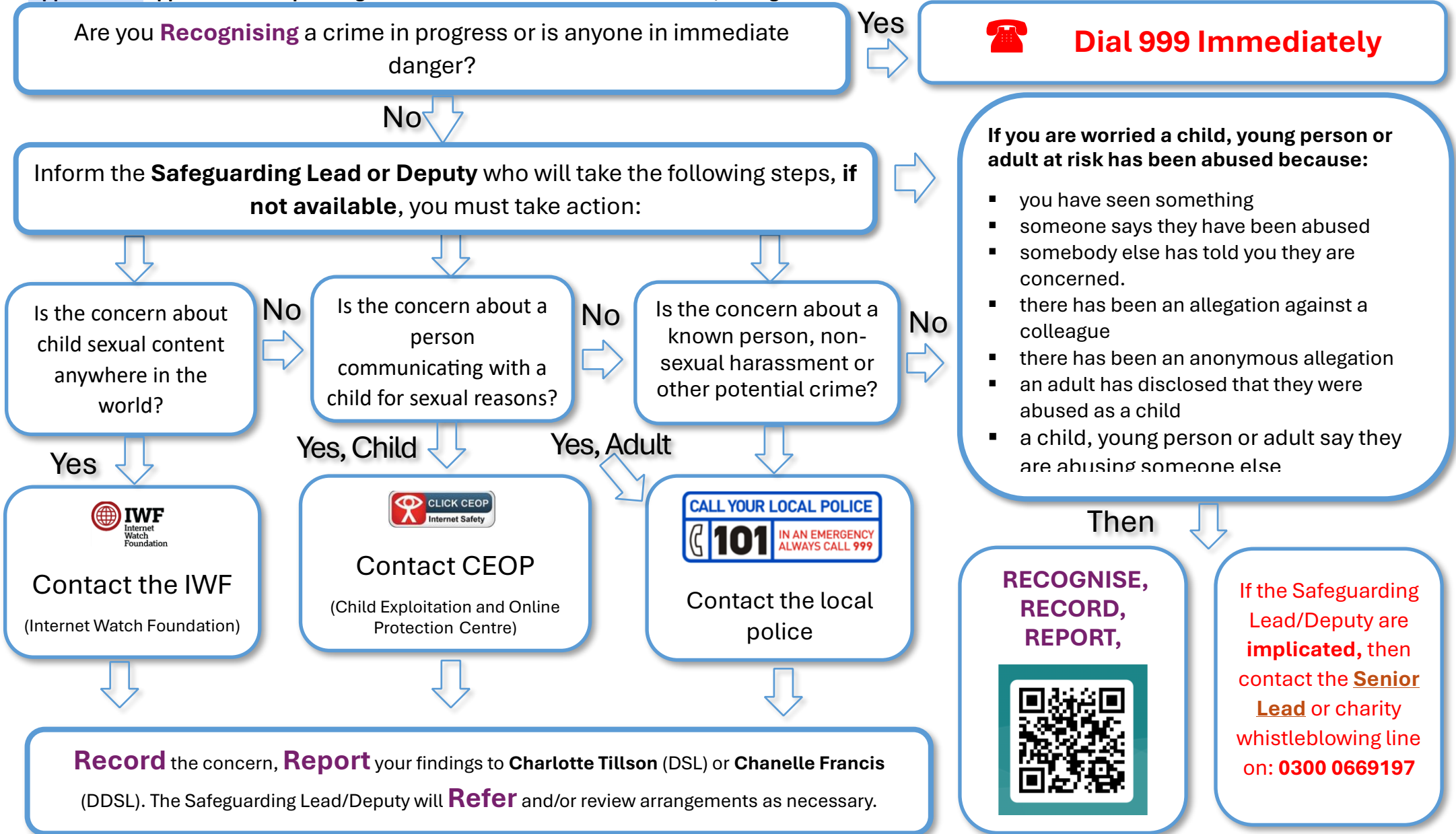
Handling Allegations

Our policies and procedures are in line with the statutory and Charity Commission guidelines and our internal procedures.

Where a safeguarding complaint or allegation is made with regards to behaviour or practice, the internal safeguarding leads will, in all cases, discuss the situation with social care services and/or the police before making a decision about the best way forward. All serious incidents will be referred to the Trustees via the safeguarding lead for the Board of Trustees.

The Senior Safeguarding Lead is responsible for informing the DBS Records service, Charity Commission and/or other statutory bodies as relevant.

Appendices: Appendix 1 - Responding to concerns: Referral Flowchart – Child, Young Person and Adults at Risk



Are you **Recognising** a crime in progress or is anyone in immediate danger?

Yes →



Dial 999 Immediately

No ↓

Inform the **Safeguarding Lead or Deputy** who will take the following steps, if **not available**, you must take action:

Is the concern about child sexual content anywhere in the world?

No →

Is the concern about a person communicating with a child for sexual reasons?

No →

Is the concern about a known person, non-sexual harassment or other potential crime?

No →

Yes ↓



Contact the IWF
(Internet Watch Foundation)

Yes, Child ↓



Contact CEOP
(Child Exploitation and Online Protection Centre)

Yes, Adult ↓



Contact the local police

If you are worried a child, young person or adult at risk has been abused because:

- you have seen something
- someone says they have been abused
- somebody else has told you they are concerned.
- there has been an allegation against a colleague
- there has been an anonymous allegation
- an adult has disclosed that they were abused as a child
- a child, young person or adult say they are abusing someone else

Then ↓

RECOGNISE, RECORD, REPORT,



If the Safeguarding Lead/Deputy are **implicated**, then contact the **Senior Lead** or charity whistleblowing line on: **0300 0669197**

Record the concern, **Report** your findings to **Charlotte Tillson (DSL)** or **Chanelle Francis (DDSL)**. The Safeguarding Lead/Deputy will **Refer** and/or review arrangements as necessary.

Appendix 2: Recognising abuse

PENS: the 4 main types of abuse

Recall these types of abuse by remembering P.E.N.S. If at any time you are uncertain do not hesitate to contact the Designated Safeguarding Lead or Deputy.

<p>PHYSICAL</p> <p>Physical abuse is when someone hurts a child or young person on purpose. There are examples of physical abuse which also include hitting, inappropriate restraint, misusing medication and more. Signs and symptoms of physical abuse in children and young people can also be difficult to spot as they may cover up injuries, one example among others.</p>	<p>EMOTIONAL</p> <p>Emotional abuse happens in many different ways. It can affect how a young person or child feels about themselves, or how they fit in with friends, at school, or where they live. Emotional abuse can make someone feel inadequate, worthless, or unloved among other examples, which you may spot signs and symptoms. Attention needing behaviour or oppositely having difficulties making or maintain relationships, are some signs among others.</p>
<p>SEXUAL</p> <p>Sexual abuse is when a child is enticed or forced to take part in sexual activities. This kind of abuse does not always involve a high level of violence and the child may or may not be aware of what is happening. The abuse may be committed by adult men and women, or by other children and young people.</p>	<p>NEGLECT</p> <p>Neglect is the ongoing failure to meet the basic needs of a child or young person and the most common form of abuse. A child or young person might be left hungry or dirty, or without proper clothing, shelter, supervision, or healthcare. This can place children or young people in danger. It can also be very difficult to sometimes <u>spot the signs</u>.</p>

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Handling Disclosures:

When a disclosure is made by a child, young person or adult at risk it is important to:

- **Recognise, Record and Report.** See [Responding to Concerns Referral Flow Chart \(Appendix 1\)](#)
- take what you are being told seriously (Recognise). Stay calm and reassure the person
- do not investigate by asking leading or closed questions. Take mental or writing notes and do not change/ dilute words used that are significant (Record)
- do not delay informing the DSL/DDSL (Report)
- in the case where the DSL/DDSL is not available, you may need to Refer (see Appendix 1)

and always

- seek advice from the Designated Safeguarding Lead (DSL) or Deputy (DDSL)
- make a careful recording of anything you are told or observe using the [Safeguarding Disclosure Form](#)
- Remember, you CAN NOT promise a child or young person that you will keep what they have disclosed a secret

A disclosure may come from:

- **someone telling you** a) they have or are being abused b) they have concerns about someone else or c) they are themselves abusing or likely to abuse someone else
- **you wanting to disclose** a) you have been abused b) you have concerns about someone else or c) you have witnessed abuse

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