Safeguarding Policy

The College of Radiographers

December 2019

Contents

Key contacts

Designated Safeguarding Lead	Email: Telephone:
Deputy Designated Safeguarding Lead	Email: Telephone:
CEO Richard Evans	Email: RichardE@sor.org Telephone: 020 7740 7200
Chair of Trustees Sandie Mathers	Email: Telephone:
Nominated Safeguarding Trustee Stephen Davies (Externally-drawn trustee)	Email: Stephen.davies@medicagroup.co.uk Telephone: 07876897958

The Charity Commission's dedicated whistleblowing email address   whistleblowing@charitycommission.gsi.gov.uk

1   Aims

1.1   This is the safeguarding policy of The College of Radiographers (Charity).

1.2   The aims of this policy are as follows:

   1.2.1   to actively safeguard and promote the welfare of the Charity's beneficiaries, staff volunteers and others who come into contact with the Charity;

   1.2.2   to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and allegations of abuse;

   1.2.3   to raise the awareness of all staff, volunteers and Trustees of their safeguarding responsibilities including to report concerns;

   1.2.4   to ensure consistent good safeguarding practice throughout the Charity.

2   What is safeguarding?

2.1   Safeguarding is the range of measures in place to protect people in the Charity, or those we come into contact with, from abuse and maltreatment of any kind.

2.2   We are an inclusive and diverse organisation that believes that everyone should be treated with dignity and respect. Any person we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation.

2.3   Safeguarding also includes additional measures in place to protect young people and adults at risk so they can live free from harm, abuse and neglect. These additional measures need to be considered in all Charity contexts and activities that may involve young people and/or adults at risk.

2.4   Young people are defined as being under the age of 18 years.

2.5   An adult might be considered at risk if they are aged 18 years or over and:

   2.5.1   has needs for care and support and;

   2.5.2   is experiencing, or at risk of, abuse or neglect; and

   2.5.3   as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

2.6   An adult at risk of abuse may:

   2.6.1   have an illness affecting their mental or physical health

   2.6.2   have a learning disability

   2.6.3   suffer from drug or alcohol problems

   2.6.4   be frail

2.7   Note that, while the above are examples of vulnerabilities to be aware of, they are not an exhaustive list of situations with the potential for abuse or maltreatment**.**

3   Scope and application

3.1   This policy applies to the whole Charity.

3.2   This policy applies at all times and wherever staff, volunteers or Trustees are working on or away from the Charity's own premises.

3.3   Reference to **staff** in this policy includes reference to all those who work on behalf of or for the Charity, regardless of their employment status, including contractors, volunteers and Trustees unless otherwise indicated.

4   Regulatory framework

4.1   This policy has regard to the following guidance and advice:

> 4.1.1   Strategy for dealing with safeguarding issues in charities (Charity Commission, December 2017);
>
> 4.1.2   Regulatory alert to charities - safeguarding (Charity Commission, December 2017);
>
> 4.1.3   Safeguarding children and young people (Charity Commission, July 2014);
>
> 4.1.4   Charities: how to protect vulnerable groups including children (Charity Commission, March 2018);
>
> 4.1.5   How to report a serious incident in your charity (Charity Commission, September 2017);
>
> 4.1.6   Working together to safeguard children (HM Government, July 2018) (WTSC);
>
> 4.1.7   Care and support statutory guidance (Department for Health, August 2017);
>
> 4.1.8   Revised Prevent duty guidance for England and Wales (HM Government, July 2015).

4.2   The following policies, procedures and resource materials are relevant to this policy:

    4.2.1   Values For All (employees)

    4.2.2   Handbook for College Board of Trustees

    4.2.3   Representing the Society and College of Radiographers: Terms of Reference (volunteers)

    4.2.4   College of Radiographers' Terms and Conditions of Grants (beneficiaries)

    4.2.5   Process for Reviewing Partner Organisation Safeguarding Policies

    4.2.6   Policy & Guidance on the Use of Society and College of Radiographers' Computer Systems (employees)

    4.2.7   Digital Communities and Social Networking (employees)

    4.2.8   Raising Concerns: Whistleblowing Policy and Procedure (employees)

    4.2.9   Managers' Guide to Recruitment (employees and Trustees)

    4.2.10 Volunteer Recruitment Policy

    4.2.11 College of Radiographers Industry Partnership Scheme (CoRIPS) Application Guidelines (beneficiaries)

5   Publication and availability

5.1   This policy is published on the Charity's website.

5.2   This policy is available in hard copy on request.

5.3   This policy can be made available in large print or other accessible format if required.

5.4   This policy and all policies referred to in it are also available to staff, volunteers and Trustees in the Staff Handbook and on the Charity's intranet.

6   Responsibility statement and allocation of tasks

6.1   The Board of Trustees has overall responsibility for all matters which are the subject of this policy.

6.2   The Board of Trustees has nominated one of its members to take leadership responsibility for the Charity's safeguarding arrangements. The Nominated Safeguarding Trustee is **Stephen Davies** whose contact details are set out in the Charity contacts list at the front of this policy.

6.3 To ensure the efficient discharge of its responsibilities under this policy, the Board of Trustees has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	[• name]	As required, and at least annually
Monitoring the implementation of the policy	[• name]	As required, and at least annually
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	[• name]	As required, with a review at least annually
Seeking input from interested groups to consider improvements to the Charity's processes under the policy	[• name]	As required, and at least annually
Formal annual review	Board of Trustees	Annually (normally July)

7 Safeguarding principles

7.1 Everyone should feel safe and protected from any form of abuse and maltreatment. The Charity is committed to creating a culture of safety, equality and protection.

7.2 The Trustees will take reasonable steps to protect from harm those who are connected with the Charity including:

7.2.1 the Charity's beneficiaries;

7.2.2 staff;

7.2.3 volunteers; and

7.2.4 other people connected to the Charity's activities.

7.3 Any safeguarding concern raised by any person will be taken seriously and action taken in accordance with the relevant policies and procedures.

7.4 The Charity will:

7.4.1 be alert to signs of abuse and maltreatment both in the Charity and from outside;

7.4.2 deal appropriately with every suspicion or complaint of abuse or maltreatment and provide appropriate support to those involved;

7.4.3   actively identify and manage risks associated with the work of the Charity, both online and offline, and take action to minimise the risk of all types of abuse and maltreatment;

7.4.4   carry out due diligence on individuals and organisations working with or connected to the Charity, ensuring that adequate safeguarding measures are in place where appropriate;

7.4.5   design and operate procedures which, so far as possible, ensure that those who are innocent are not prejudiced by false or unfounded allegations;

7.4.6   assess the risk of the Charity being abused for extremist purposes, identify individuals who may be vulnerable to radicalisation, and know what to do when they are identified; and

7.4.7   consider and develop procedures to deal with any other safeguarding issues which may be specific to individuals with whom the Charity works.

8   Designated Safeguarding Lead (DSL)

8.1   The Board of Trustees has appointed a DSL. The DSL is a senior member of staff with the necessary status and authority to take lead responsibility for safeguarding within the Charity.

8.2   The specific roles to be performed by the DSL include:

8.2.1   ensure the risks associated with the work of the Charity are adequately risk assessed and that the relevant findings are implemented, monitored and evaluated;

8.2.2   ensure the Charity's safeguarding policies and procedures are appropriately known and understood;

8.2.3   support staff in fulfilling their safeguarding responsibilities, including arranging the required training;

8.2.4   liaise with external agencies where appropriate including local authority social care departments, the police and the relevant services (see 8 below);

8.2.5   ensure this policy is reviewed annually (as a minimum) and the procedures are implemented appropriately (see 12 below);

8.2.6   keep detailed, accurate and secure written records of risk assessments, concerns and referrals.

8.3   The DSL shall be given the time, funding, training, resources and support to enable him / her to provide advice and support to other staff on safeguarding matters, and, where appropriate, to take part in inter-agency meetings (and / or to support other staff to do so). The name and contact details of the DSL are set out in the Charity contacts list at the front of this policy.

8.4   If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL. The Deputy DSL's details are also set out in the Charity contacts list at the front of this policy.

9   Recruitment

9.1   The Charity will follow the principles in this section in the rare and unusual circumstances that the Charity works with children or vulnerable adults.

9.2   The Charity is committed to safeguarding and promoting the welfare of its beneficiaries. If working with children or adults at risk, the Charity recognises that it has a duty to recruit staff, volunteers and trustees who are suitable to carry out this work. The Charity follows a professional recruitment process when recruiting staff, volunteers and trustees.

9.3   Checks / referrals may be required with one or more of the following 'relevant services':

    9.3.1   Disclosure and Barring Service (England and Wales);

    9.3.2   Children's Barred List and/or Adults' Barred List (England, Wales and Northern Ireland);

    9.3.3   AccessNI (Northern Ireland);

    9.3.4   Disclosure Scotland;

    9.3.5   Protecting Vulnerable Groups (PVG) Scheme (Scotland).

9.4   The Charity will carry out a criminal records check with the relevant services when recruiting for eligible positions. The purpose of carrying out such checks is to determine whether an individual is suitable to work with children or vulnerable adults, as appropriate, and to identify whether they are barred from doing so.

9.5   The Charity will take into account the duties and responsibilities of each role for which it is recruiting to determine which level of check to carry out and whether a check of the relevant services is permitted. The Charity will not carry out these checks for positions which are not eligible.

9.6   Referrals to the police and/or relevant services

    9.6.1   It is unlawful for the Charity to knowingly allow a person to work with children and / or vulnerable adults if they are barred from doing so. It is a criminal offence for any person who is barred from working with children or vulnerable adults to apply for a position which involves such work.

    9.6.2   The Charity will make a report to the police and/or the relevant services if:

        (a)   it receives an application from a barred person

        (b)   it is provided with false information in, or in support of an applicant's application; or

        (c)   it has serious concerns about an applicant's suitability to work with children and / or vulnerable adults.

    9.6.3   The Charity also has a legal duty to make a referral to the relevant services if a person is removed by the Charity from working in regulated activity, or has removed themselves from regulated activity, because they have harmed, or pose a risk of harm to, a child and / or vulnerable adult.

10   Procedures for reporting safeguarding concerns

10.1   Staff should maintain an attitude of "**it could happen here**" where safeguarding is concerned. **If staff are ever unsure, they must always speak to the DSL**.

10.2   Any concern about an individual's welfare should be reported to the DSL as soon as possible. The DDSL should be contacted in the DSL's absence.

10.3   If an individual is in **immediate** danger, a referral should be made to the police immediately. Anybody can make a referral in these circumstances. If the referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

10.4   On receipt of a report of a concern, the DSL will consider the appropriate course of action to take in accordance with the Charity's policies and procedures and, where appropriate, the procedures of the relevant local authority social care teams.

10.5   Dealing with allegations against staff

   10.5.1   Where an allegation or complaint is made against any member of staff (other than the DSL), the matter should be reported immediately to the DSL.

   10.5.2   Where an allegation or complaint is made against the DSL, the matter should be reported immediately to the CEO, the Nominated Safeguarding Trustee and the Chair of Trustees.

   10.5.3   The Charity will follow its employment procedures for dealing with concerns raised about staff, involving external agencies as appropriate.

   10.5.4   Detailed guidance is given to staff to ensure that staff are clear on the rules of conduct and the expectations of the Charity in relation to contact with beneficiaries, colleagues and any other person who comes into contact with the Charity. This guidance is contained in:

      (a)   Values For All (employees)

      (b)   Handbook for College Board of Trustees

      (c)   Representing the Society and College of Radiographers: Terms of Reference (volunteers)

      (d)   College of Radiographers' Terms and Conditions of Grants (beneficiaries)

10.6   Whistleblowing

   10.6.1   In the event that a staff member is of the opinion that their attempt to raise concerns over safeguarding had not been adequately dealt with internally, they have recourse to the whistleblowing policy.

   10.6.2   Staff may follow the Charity's whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the Charity or potential failures by the Charity or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously.

   10.6.3   No employee or other person working on behalf of the Charity will be victimised for raising a matter under the Charity's whistleblowing policy. Maliciously making a false allegation is a disciplinary offence.

10.6.4   The identity of the complainant will be known to the DSL, DDSL, CEO and Nominated Safeguarding Trustee. This information will be processed with an appropriate level of confidentiality; wherever possible, the consent of the complainant will be sought prior to further dissemination.

10.6.5   The Charity Commission has a dedicated whistleblowing email address for staff to report concerns about categories of serious wrongdoing within the Charity, which may include safeguarding issues. This can be used by staff who do not feel able to raise concerns about safeguarding failures internally. See the front of this policy for the relevant contact details. Staff are encouraged to follow the Charity's whistleblowing policy before considering using the Charity Commission's whistleblowing email address.

11   Reporting serious incidents

11.1   The Charity will report all incidents to the Charity Commission in accordance with the guidance How to report a serious incident in your charity (Charity Commission, September 2017 https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity)

11.2   Examples of serious incidents that should be reported to the Charity Commission include but are not limited to:

11.2.1   beneficiaries of the Charity have been, or are alleged to have been, abused or mistreated while under the care of the Charity or by someone connected with the Charity, for example a Trustee, staff member or volunteer;

11.2.2   there has been an incident involving the abuse or mistreatment (alleged or actual) of someone and this is connected with the activities of the Charity;

11.2.3   there has been a breach of procedures or policies at the Charity which has put beneficiaries at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or adults.

11.3   The Charity will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy as appropriate.

12   Training

12.1   The Charity ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

12.2   The level and frequency of training depends on the role of the individual.

12.3   The Charity maintains written records of all staff training.

12.4   Induction

12.4.1   All staff will be provided with induction training that includes:

(a)   this policy;

(b)   the role of the DSL and his / her identity and contact details together with that of and his / her Deputy;

(c)   the indicators of abuse staff should be aware of;

(d)   the Staff Handbook (employees), Handbook for College Board of Trustees (trustees) or Representing the Society and College of Radiographers: Terms of Reference (volunteers) which include the whistleblowing policy.

12.5   Safeguarding training

12.5.1 All staff will receive a copy of this policy, and will be required to confirm that they have read and understand it.

12.5.2 All staff members, long-term volunteers and Trustees will undertake appropriate training about protection issues and their safeguarding responsibilities in accordance with statutory guidance. This training will be updated regularly.

12.5.3 Additionally, the Charity will make an assessment of the appropriate level and focus for training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, and mental health.

12.5.4 The Nominated Safeguarding Trustee will receive appropriate training to enable him / her to fulfil his / her safeguarding responsibilities.

12.6   Designated Safeguarding Lead (DSL)

12.6.1 The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role which will be updated at least every two years.

12.6.2 In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role.

13   Monitoring and review

13.1   The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Board of Trustees as necessary and seeking contributions from staff.

13.2   Any safeguarding incidents at the Charity will be followed by a review of these procedures by the DSL and a report made to the Board of Trustees. Consideration will be given to changes that can be made to reduce the risk of any further incidents.

13.3   The Board of Trustees will undertake an annual review of this policy and the Charity's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

13.4   The DSL will work with the Nominated Safeguarding Trustee, preparing a written report commissioned by the Board of Trustees. The written report should address how the Charity ensures that this policy is kept up to date; staff training on safeguarding; issues and themes which may have emerged in the Charity and how these have been handled; and, where appropriate, the contribution the Charity is making to multi-agency working in individual cases or local discussions on safeguarding matters. A template for these written reports is given in section 15.

13.5   The Board of Trustees should also consider independent corroboration, such as inspection of records or feedback from external agencies. The Board of Trustees will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the

policy before giving the revised policy its final approval. Detailed minutes recording the review by the Board of Trustees will be made.

14   Record keeping

14.1   All records created in accordance with this policy are managed in accordance with the Charity's policies that apply to the retention and destruction of records.

14.2   All concerns, discussions and decisions made in accordance with this policy and the reasons for those decisions should be recorded in writing.

14.3   The DSL will keep a summary of discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

14.4   The records created in accordance with this policy may contain personal data only when necessary. The Charity has a privacy notice which explains how the Charity will use personal data which is published on the Charity's website. In addition, staff must ensure that they follow the Charity's data protection policies and procedures when handling personal data created in connection with this policy. This includes the Charity's Data Protection Compliance Handbook.

14.5   Information sharing

14.5.1   The Charity will keep all safeguarding records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of the individual.

14.5.2   The Charity will co-operate with police and the local authority social care teams to ensure that all relevant information is shared for the purposes of child protection and adult safeguarding investigations.

15   Version control

Date of adoption of this policy	[• 00 month year]
Date of last review of this policy	[• 00 month year]
Date for next review of this policy	[• 00 month year]
Policy owner (DSL)	[• name]
Policy owner (Board of Trustees)	[• name]

16   Template for annual safeguarding policy report to the Board of Trustees

TITLE	**CoR Safeguarding Policy Annual Report to the Board of Trustees**
STATUS	Draft: For discussion and agreement by Trustees
DRAFTED BY	Designated Safeguarding Lead [NAME]
REVIEWED BY	Nominated Safeguarding Trustee [NAME]
REPORT DATE	
TIME PERIOD COVERED	[01/07/20XX TO 30/06/20XX]
Summary of annual review of the effectiveness of safeguarding procedures and their implementation **Summary of the effectiveness of any inter-agency working**	
Steps taken to ensure the safeguarding policy is up to date	
Any proposed updates to the safeguarding policy	
Staff training on safeguarding undertaken	
Any issues and themes that have emerged and how they have been handled	
Any other updates relating to Safeguarding	