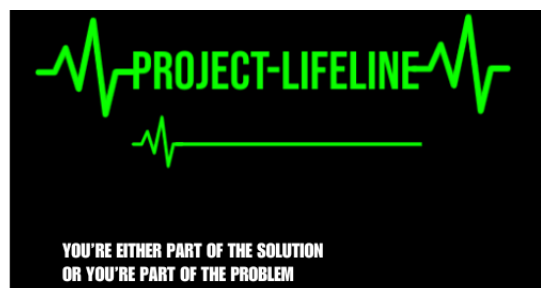


Project Lifeline

WE ARE PART OF THE SOLUTION



Safeguarding Policy

Policy Purpose

Our company activities include working with vulnerable young people. The purpose of this policy is to protect children and vulnerable adults and provide stakeholders and the public with the overarching principles that guide our approach to doing so. Young people involved in gangs are additionally vulnerable due to their experiences and the impacts of these experiences on the health and welfare of the young person as well as their friends, family, and community. Therefore, it is important that safeguarding risks are identified and procedures are implemented to report and mitigate these risks. There are many risks in our area of work with young gang affiliated people, including threats of harm, immediate danger to life, mental health concerns, physical, psychological, emotional, and sexual abuse, neglect, exploitation, substance use, and family problems.

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect young people in England. A summary of the key legislation and guidance is available at nspcc.org.uk/childprotection.

Safeguarding Principles

We believe that:

- The welfare of young people is paramount in all the work we do and decisions we make.
- Working in partnership with children, young people, their parents, carers, and other agencies is essential to promoting young people's welfare.
- Children and young people should never experience abuse of any kind.
- Everyone has a responsibility to promote the welfare of all children and young people, to keep them safe, and to practise in a way that protects them. Any abuse discovered or suspected should be reported and the appropriate procedures followed.
- We will give equal priority to keeping all children and young people safe, regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.
- Nobody who is involved in our work should ever experience abuse, harm, neglect, or exploitation.
- We all have a responsibility to promote the welfare of all of our staff and volunteers, to keep them safe, and to work in a way that protects them.
- We all have a collective responsibility for creating a culture in which our people not only feel safe but are also able to speak up if they have any concerns.
- Some young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs, or other issues. Extra

safeguards may be needed to keep young people who are additionally vulnerable safe from abuse.

Safeguarding Policy Applicability

This safeguarding policy applies to anyone working on our behalf, including our company trustees and other volunteers.

Partner organisations will be required to have their own safeguarding procedures that must, as a minimum, meet the standards outlined below and include any additional legal or regulatory requirements specific to their work. These may include, but are not limited to:

Other UK regulators, if applicable, such as Ofsted or CQC.

Other authorities, such as the DfES or NHS.

There may be other requirements or frameworks for those working overseas.

The International Child Safeguarding Standards.

Safeguarding should be appropriately reflected in other relevant policies and procedures.

Reporting Safeguarding Concerns

If an individual is in immediate danger, call 999, as you would in any other circumstance.

If you are a member of the public, make your concerns known to a member of our team, who will alert a senior member of the company.

For staff, make your concerns known to your manager or a senior member of the company using the appropriate documentation. If you feel unable to do so, speak to the NSPCC helpline.

Staff Safeguarding Responsibilities

Responsibilities should be made clear, and individuals should be provided with any necessary training and resources to enable them to carry out their role.

This safeguarding policy will be reviewed and approved by the Board annually.

A lead committee will be given responsibility for the oversight of all aspects of safety, including whistleblowing and H&SW. This will include:

- Creating a culture of respect in which everyone feels safe and is able to speak up.
- An annual review of safety with recommendations to the Board.
- Receiving regular reports to ensure this and related policies are being applied consistently.
- Providing oversight of any lapses in safeguarding.
- Ensuring that any issues are properly investigated and dealt with quickly, fairly, and sensitively, and that any reporting to the Police/statutory authorities is carried out.
- Leading the organisation in a way that makes everyone feel safe and able to speak up.

- Ensuring safeguarding risk assessments are carried out and appropriate action taken to minimise these risks as part of the risk management processes.
- Ensuring that all relevant checks are carried out when recruiting staff and volunteers, including DBS checks.
- Planning programmes/activities to take into account potential safeguarding risks and ensure these are adequately mitigated.
- Ensuring that all appointments that require DBS clearance and safeguarding training are identified, including the level of DBS and any training required.
- Ensuring that a central register is maintained and subject to regular monitoring to ensure that
- DBS clearances and training are kept up-to-date.
- Ensuring that safeguarding requirements (eg DBS) and responsibilities are reflected in job descriptions, appraisal objectives and personal development plans, as appropriate.
- Listening and engaging, beneficiaries, staff, volunteers and others and involving them as appropriate.
- Responding to any concerns sensitively and acting quickly to address these.
- Ensuring that personal data is stored and managed in a safe way that is compliant with data protection regulations, including valid consent to use any imagery or video.
- Making staff, volunteers and others aware of:
- Our safeguarding procedures and their specific safeguarding responsibilities on induction, with regular updates/reminders, as necessary.
- The signs of potential abuse and how to report these.
- Everyone: To be aware of our procedures, undertake any necessary training, be aware of the risks and signs of potential abuse and, if you have concerns, to report these immediately (see above).

Online Safeguarding Procedures

We will identify and manage online risks by ensuring:

Volunteers and staff understand how to keep themselves safe online. Including high privacy settings to access sensitive documents and password access to meetings.

The services we use and/or provide are safe and in line with our code of conduct.

Protect people's personal data and follow GDPR legislation.

We have permission to display any images on our website or social media accounts, including consent from an individual, parent, etc.

We clearly explain how users can report online concerns. Concerns may be reported using this policy or directly to a social media provider using their reporting process.

Keeping Young People Safe

We will seek to keep young people safe by:

- valuing, listening to and respecting them
- appointing a nominated child protection lead for children and young people, a deputy and a lead trustee/board member for safeguarding
- adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers

- developing and implementing an effective online safety policy and related procedures
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- sharing information about safeguarding and good practice with young people and their families via leaflets, posters, group work and one-to-one discussions
- making sure that children, young people and their families know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people, and their families treat each other with respect and are comfortable sharing concerns.

Approval and Review

Approval By C Lillie

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

GDPR Privacy Policy

The type of personal information we collect

We currently collect and process the following information:

Personal identifiers, contacts and characteristics (for example, name and contact details)
Website user stats,
Young people's email addresses, phones numbers,
Volunteer and employee data

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

To contact you

We also receive personal information indirectly, from the following sources in the following scenarios:

Personal information from probation services, social services, schools.

We use the information that you have given us in order to

Tailor plans suitable to individual circumstances

We may share this information with parents/carers, probation services, social services.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting info@projectlifeline.org.uk
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.
- (f) We have a legitimate interest.

How we store your personal information

Your information is securely stored.

We keep personal information about our young people for the duration of our time working with them. We will then dispose of this information by deleting it from our database.

Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay a charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@projectlifeline.org.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at info@projectlifeline.org.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Our contact details

Name: Project Lifeline

Website: projectlifeline.org.uk

Phone Number: 0800

E-mail: info@projectlifeline.org.uk

Approval and Review

Approval By M Rodney

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Health & Safety Policy

Statement of Intent

Our health and safety policy is to:

- Prevent accidents and cases of work related ill-health.
- Manage health and safety risks in our workplace.
- Provide clear instructions and information, and adequate training, to ensure employees and volunteers are competent to carry out their work.
- Consult with our employees and volunteers on matters affecting their health and safety.
- Maintain safe and healthy working conditions.
- Implement emergency procedures, including evacuation in the case of a fire, or other significant incidents.
- Review and revise this policy regularly, at least yearly.

Responsibilities for Health & Safety

Overall and final responsibility for health and safety:

Mark Rodney, CEO

Day to day responsibility for ensuring this policy is put into practice:

Cheronagh Lillie, Director

To ensure health and safety standards are maintained/improved, the following people have responsibility in the following areas:

Mark Rodney and Cheronagh Lillie- safety, risk assessments, consulting employees and volunteers, accidents, first aid, work related ill-health, monitoring, emergency procedures, training, instruction and supervision.

All employees should:

- cooperate with supervisors and managers on health and safety matters;
- take reasonable care of their own health and safety; and
- report all health and safety concerns to an appropriate person (as detailed above).

Arrangements for Health & Safety

Risk assessment

- We will complete relevant risk assessments and take action.
- We will review risk assessments when working habits or conditions change.

Training

- We will give staff and volunteers health and safety induction and provide appropriate training.

Consultation

- We will consult staff routinely on health and safety matters as they arise and formally when we review health and safety.

Evacuation

- We will ensure escape routes are well signed and kept clear at all times.
- We will ensure evacuation plans are tested from time to time and are updated if necessary.

Approval and Review

Approval By C Lillie

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Equal Opportunities Policy

Introduction

Project Lifeline is committed to a policy of equality of opportunity as an employer with regard to our policies and practices for employees and potential employees. This means that no employee or applicant will be treated less favourably on the grounds of their sex, marital status, race, nationality or ethnic origin, disability, sexual orientation, gender identity, age, religion, working practices or whether they have HIV and/or AIDS.

The Equal Opportunities Policy will be communicated to all applicants, new appointees during their induction and to all employees.

Principles

Project Lifeline recognises that discrimination exists and, as a company, is committed to ensuring that such behaviour and attitudes are eliminated. Discrimination and harassment will not be tolerated and will be dealt with under the Disciplinary Procedure. We are committed to the principles of equality on the basis of fairness and valuing the contribution of everyone.

Project Lifeline is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination. The aim is for our workforce to be truly representative of all sections of society and the people we work with, and for each employee to feel respected and able to give their best. The organisation is also committed against unlawful discrimination of the young people we work with.

Our Policy's Purpose

This policy's purpose is to:

- Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time
- Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex, sexual orientation
- Oppose and avoid all forms of unlawful discrimination. This includes in: pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, selection for employment, promotion, training or other development opportunities

Our Commitments

The organisation commits to:

- Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and

the contributions of all staff are recognised and valued. This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination. All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

- Take serious complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, volunteers, people we work with, young people, the public and any others in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
- Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Make decisions concerning staff based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

Complaints

Should an employee believe they have experienced harassment, bullying or discrimination then they may either attempt to resolve the matter informally or invoke the formal complaint procedure. All cases will be taken seriously, dealt with quickly and treated with the utmost confidence. Whilst we do not wish to deter individuals who wish to make genuine complaints, it should be noted that vindictive or vexatious complaints will be viewed seriously and will be dealt with under the disciplinary procedure. Equally unacceptable is the threat of making an unfounded complaint of discrimination or harassment.

Approval and Review

Approval By M D 'Souza

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Social Media & Digital Policy

Purpose

A guide for staff on using social media to promote the work of Project Lifeline and in a personal capacity

This policy will be reviewed on an ongoing basis, at least once a year. Project Lifeline will amend this policy, following consultation, where appropriate.

Introduction

Social media is the term given to web-based tools and applications which enable users to create and share content (words, images and video content), and network with each other through the sharing of information, opinions, knowledge and common interests. Examples of social media include Facebook, Twitter, LinkedIn and Instagram.

Social media is essential to the success of communicating Project Lifeline's work. It is important for some staff to participate in social media to engage with our audience, participate in relevant conversations and raise the profile of our work.

The difference between a personal and professional opinion can be blurred on social media, particularly when discussing issues relating to Project Lifeline's work. While we encourage the use of social media, we have certain standards, outlined in this policy, which we require everyone to observe. Publication and commentary on social media carries similar obligations to any other kind of publication or commentary in the public domain.

This policy is intended for all staff members of all levels and volunteers. Before engaging in work-related social media activity, staff must read this policy. This policy sets out guidelines on how social media should be used to support the delivery and promotion of Project Lifeline, and the use of social media by staff in both a professional and personal capacity. It sets out what you need to be aware of when interacting in these spaces and is designed to help staff support and expand our official social media channels, while protecting the company and its reputation and preventing any legal issues.

Cheronagh Lillie is responsible for the day-to-day publishing, monitoring and management of our social media channels. If you have specific questions about any aspect of these channels, speak to her. No other staff member can post content on Project Lifeline's official channels without the permission of the Founder.

Project Lifeline uses the following social media channels:
Facebook, Twitter, Instagram, LinkedIn, Spotify, YouTube,

Appropriate conduct Guidelines

Melissa D'Souza is responsible for setting up Project Lifeline's social media channels. Only those authorised to do so by the Founder will have access to these accounts.

Staff should ensure they reflect our values in what they post and use our tone of voice. All social media content should have a purpose and a benefit for Project Lifeline. Take care with the presentation of content. Make sure that there are no typos, misspellings or grammatical errors. Also check the quality of images. Always pause and think before posting. That said, reply to comments in a timely manner, when a response is appropriate.

Staff shouldn't post content about young people without their express permission. If staff are sharing information about third party organisations, this content should be clearly labelled so our audiences know it has not come directly from Project Lifeline. If using interviews, videos or photos that clearly identify a child or young person, staff must ensure they have the consent of a parent or guardian before using them on social media.

Always check facts. Staff should not automatically assume that material is accurate and should take reasonable steps where necessary to seek verification, for example, by checking data/statistics and being wary of photo manipulation.

Be honest. Say what you know to be true or have a good source for. If you've made a mistake, don't be afraid to admit it.

Staff should refrain from offering personal opinions via Project Lifeline's social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in doubt about Project Lifeline's position on a particular issue, please speak to the Founder.

It is vital that Project Lifeline does not encourage others to risk their personal safety or that of others, to gather materials. For example, a video of knife crime.

Staff should not encourage people to break the law to supply material for social media, such as using unauthorised video footage. All relevant rights for usage must be obtained before publishing material.

Staff should not set up other Facebook groups or pages, Twitter accounts or any other social media channels on behalf of Project Lifeline. This could confuse messaging and brand awareness. By having official social media accounts in place, the social media team can ensure consistency of the brand and focus on building a strong following.

Project Lifeline is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. We have every right to express views on policy, including the policies of parties, but we can't tell people how to vote.

If a complaint is made on Project Lifelines social media channels, staff should seek advice from their manager before responding.

Sometimes issues can arise on social media which can escalate into a crisis situation because they are sensitive or risk serious damage to the charity's reputation. Examples might include: gang conflicts. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the charity.

The social media team regularly monitors our social media spaces for mentions of Project Lifeline so we can catch any issues or problems early. If there is an issue that could develop or has already developed into a crisis situation, the team will appropriately respond to the situation.

If any staff outside of the social media team become aware of any comments online that they think have the potential to escalate into a crisis, whether on Project Lifeline's social media channels or elsewhere, they should speak to their manager.

Use of personal social media accounts — appropriate conduct

This policy does not intend to inhibit personal use of social media but instead flags up those areas in which conflicts might arise. Staff are expected to behave appropriately, and in ways that are consistent with Project Lifeline's values and policies, both online and in real life.

Be aware that any information you make public could affect how people perceive Project Lifeline. You must make it clear when you are speaking for yourself and not on behalf of Project Lifeline. If you are using your personal social media accounts to promote and talk about our work, you must use a disclaimer such as: "The views expressed on this site are my own and don't necessarily represent Project Lifeline's positions, policies or opinions."

Staff who have a personal blog or website which indicates in any way that they work at Project Lifeline should discuss any potential conflicts of interest with their line manager. Similarly, staff who want to start blogging and wish to say that they work for Project Lifeline should discuss any potential conflicts of interest with their line manager.

Those in senior management, and specialist roles where they are well known in their field of expertise, must take particular care as personal views published may be misunderstood as expressing Project Lifeline's view.

Use common sense and good judgement. Be aware of your association with Project Lifeline and ensure your profile and related content is consistent with how you wish to present yourself to the public.

Project Lifeline works with several high profile people, including celebrities. Please don't approach high profile people from your personal social media accounts to ask them to support the charity, as this could hinder any potential relationships that are being managed. This includes asking for retweets about the charity. If you have any information about high profile people that have a connection to our cause, or if there is someone who you would like to support the charity, please speak to your manager to share the details.

If a staff member is contacted by the press about their social media posts that relate to Project Lifeline, they should talk to their manager immediately and under no circumstances respond directly.

Project Lifeline is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. When representing Project Lifeline, staff are expected to hold our position of neutrality. Staff who are politically active in their spare time need to be clear in separating their personal political identity from Project Lifeline, and understand and avoid potential conflicts of interest.

Always protect yourself and the charity. Be careful with your privacy online and be cautious when sharing personal information. What you publish is widely accessible and will be around for a long time, so do consider the content carefully. When you are using social media sites at work, it is important that you do so safely.

Think about your reputation as well as the charity's. Express your opinions and deal with differences of opinion respectfully. Don't insult people or treat them badly. Passionate discussions and debates are fine, but you should always be respectful of others and their opinions. Be polite and the first to correct your own mistakes.

We encourage staff to share tweets and posts that we have issued. When online in a personal capacity, you might also see opportunities to comment on or support us and the work we do. Where appropriate and using the guidelines within this policy, we encourage staff to do this as it provides a human voice and raises our profile. However, if the content is controversial or misrepresented, please highlight this to your manager who will respond as appropriate.

Further Guidelines

Libel is when a false written statement that is damaging to a person's reputation is published online or in print. Whether staff are posting content on social media as part of their job or in a personal capacity, they should not bring Project Lifeline into disrepute by making defamatory comments about individuals or other organisations or groups.

It is critical that all staff abide by the laws governing copyright, under the Copyright, Designs and Patents Act 1988. Never use or adapt someone else's images or written content without permission. Failing to acknowledge the source/author/resource citation, where permission has been given to reproduce content, is also considered a breach of copyright.

Any communications that staff make in a personal capacity must not breach confidentiality. For example, information meant for internal use only or information that Project Lifeline is not ready to disclose yet.

Staff should not post content that could be considered discriminatory against, or bullying or harassment of, any individual, on either an official Project Lifeline social media channel or a personal account. For example: making offensive or derogatory comments relating to sex, gender, race, disability, sexual orientation, age, religion or belief, using social media to bully another individual, posting images that are discriminatory or offensive or links to such content

There should be no systematic or routine checking of a candidate's online social media activities during the recruitment process, as conducting these searches might lead to a presumption that an applicant's protected characteristics, such as religious beliefs or sexual orientation, played a part in a recruitment decision. This is in line with Project Lifeline's Equal Opportunities Policy.

The responsibility for measures of protection and intervention lies first with the social networking site itself. Different social networking sites offer different models of interventions in different areas. For more information, refer to the guidance available on the social networking site itself. However, if a staff member considers that a person/people is/are at risk of harm, they should report this to their manager immediately.

Young and vulnerable people face risks when using social networking sites. They may be at risk of being bullied, publishing sensitive and personal information on their profiles, or from becoming targets for online grooming.

Where known, when communicating with young people under 18-years-old via social media, staff should ensure the online relationship with Project Lifeline follows the same rules as the offline 'real-life' relationship. Staff should ensure that young people have been made aware of the risks of communicating and sharing information online, and given guidance on security/privacy settings as necessary. Staff should also ensure that the site itself is suitable for the young person and Project Lifeline's content and other content is appropriate for them. Please refer to our Safeguarding Policy.

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of Project Lifeline is not a right but an opportunity, so it must be treated seriously and with respect. For staff, breaches of policy may incur disciplinary action, depending on the severity of the issue. Staff who are unsure about whether something they propose to do on social media might breach this policy, should seek advice from their manager.

Approval and Review

Approval By M D'Souza

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Modern Slavery & Human Trafficking Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Project Lifeline has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We expect the same high standards from all of our business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, volunteers, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy

Project Lifeline has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Cheronagh Lillie has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Cheronagh Lillie, Director.

Compliance with the policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager or a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of

modern slavery in any parts of our business at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director as soon as possible.. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with your line manager or company Director. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately.

Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Organisation structure and supply chains

Project Lifeline runs company operations in the United Kingdom. We operate as a community interest company in the crime prevention sector. We work with our business partners to provide services for young gang affiliate youth including training and employment schemes, mental health support, mentoring services, advocacy support and solicitor services. For more information about us please visit our website projectlifeline.org.uk.

Policies in relation to slavery and human trafficking

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include the following:

- Safeguarding Policy
The purpose of our safeguarding policy is to protect children and vulnerable adults and provide stakeholders and the public with the overarching principles that guide our approach to doing so.
- Equal Opportunities Policy

The purpose of the equal opportunities policy is to prevent discrimination in the workplace and provide equal opportunities for all.

We make sure our business partners are aware of our policies and adhere to the same standards.

Due diligence processes

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains we have adopted the following due diligence procedures:

- Conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Creating an annual risk profile for each supplier.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks.
- Reduce the risk of slavery and human trafficking occurring in our business.

Risk assessment and management

We have evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring through:

- Evaluating the slavery and human trafficking risks of each new business partner.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because we are based in the UK with strict regulations and we are a community interest company.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers/business partners, we will seek to terminate our relationship with them with immediate effect.

Key performance indicators to measure effectiveness of steps being taken

The KPIs we use to measure effectiveness and ensure that slavery and human trafficking is not taking place in our business and supply chains are as follows:

- We require all staff to complete training on modern slavery on induction.
- Developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain.

Training on modern slavery and trafficking

All staff are required to attend training on modern slavery and trafficking to aid prevention, detection and reporting. This forms part of our induction process for all staff and volunteers and is mandatory. Our modern slavery training covers:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating emails to staff. The emails explain to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

Approval and Review

Approval By M Rodney

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Whistleblowing Policy

Introduction

Project Lifeline is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable staff and other members of Project Lifeline to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs.

Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Project Lifeline has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

Scope of Policy

This policy is designed to enable employees of Project Lifeline to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

Protection - this policy is designed to offer protection to those employees of Project Lifeline who disclose such concerns provided the disclosure is made:

- in good faith

- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below).
- It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality - Project Lifeline will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations - this policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations - If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the appropriate Director, Cheronagh Lillie, unless the complaint is against the Director or is in any way related to the actions of the Director. In such cases, the complaint should be passed to Mark Rodney, Founder for referral.
- In the case of a complaint, which is any way connected with but not against Cheronagh Lillie, Mark Rodney will nominate a Senior Manager or external party to act as the alternative investigating officer.
- Complaints against the Founder, Mark Rodney, should be passed to Cheronagh Lillie, who will nominate an appropriate internal / external investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to the Founder. The Founder has the right to refer the complaint back to management if he feels that management, without any conflict of interest, can more appropriately investigate the complaint.

- Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach one of the following individuals who have been designated and trained as independent points of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them: Protect advice helpline 020 3117 2520, Speak Up helpline 080 0072 4725.
- If there is evidence of criminal activity then the investigating officer should inform the police. Project Lifeline will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address marked “confidential”.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or work colleague at any future interview or hearing held under the provision of these procedures. At the discretion of the investigating officer and dependant on the circumstances of the complaint an alternative representative may be allowed e.g. the individual’s legal representative.
- The investigating officer should consider the involvement of the Police at this stage and should consult with the Founder if appropriate.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Board of Directors or Founder as appropriate.

- The Founder will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of Company procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Founder or an appropriate Director, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, Project Lifeline recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or body. A full list of prescribed people and bodies can be found on the Government Website (www.gov.uk).

Approval and Review

Approval By M Rodney

Date 01/03/2025

Next Review Date 01/03/2026

Child Protection Policy

Project Lifeline is fully committed to safeguarding the welfare of all children in its care. It recognises the responsibility to promote safe practice and to protect children from harm, abuse and exploitation. For the purposes of this policy and associated procedures a child is recognised as someone under the age of 18 years.

Staff and volunteers will work together to embrace difference and diversity and respect the rights of children and young people.

This document outlines Project Lifeline's commitment to protecting children.

These guidelines are based on the following principles:

- The welfare of children is the primary concern.
- All children, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from all forms of harm and abuse.
- Child protection is everyone's responsibility.
- Children have the right to express views on all matters which affect them, should they wish to do so.
- Organisations shall work in partnership together with children and parents/carers to promote the welfare, health and development of children.

Project Lifeline will:

- Promote the health and welfare of children by providing opportunities for them to take part in all activities safely.
- Respect and promote the rights, wishes and feelings of children.
- Promote and implement appropriate procedures to safeguard the well-being of children and protect them from abuse.
- Recruit, train, support and supervise its staff, members and volunteers to adopt best practice to safeguard and protect children from abuse and to reduce risk to themselves.
- Require staff, members and volunteers to adopt and abide by this Child Protection Policy and these procedures.
- Respond to any allegations of misconduct or abuse of children in line with this Policy and these procedures as well as implementing, where appropriate, the relevant disciplinary and appeals procedures.
- Observe guidelines issued by local Child Protection Committees for the protection of children.
- Regularly monitor and evaluate the implementation of this Policy and these procedures.

Review

This Policy and these Procedures will be regularly reviewed:

- In accordance with changes in legislation and guidance on the protection of children or following any changes within Project Lifeline.
- Following any issues or concerns raised about the protection of children within Project Lifeline.
- In all other circumstances, at least every three years.

Approval and Review

Approval By M D'Souza

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Vulnerable Adult Protection Policy

Introduction

This policy is to make sure that Project Lifeline has all the right things in place to protect and safeguard adults.

Project Lifeline believes in protecting an adult's right to live in safety, free from abuse and neglect. This policy sets out the roles and responsibilities of Project Lifeline in working together in promoting the adult's welfare and safeguarding them from abuse and neglect. Employees, trustees and volunteers should be made aware of how this policy can be accessed.

This policy and related procedures are applicable to all staff, trustees, employees, and volunteers of Project Lifeline. Failure to comply with the policy and related procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

Care Act 2014 Definition of an Adult at Risk of Abuse

Where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)

- (a) has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) is experiencing, or is at risk of, abuse or neglect, and
- (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Key Principles of Adult Safeguarding

In the safeguarding of adults, Project Lifeline is guided by the six key principles set out in The Care Act 2014 and Making Safeguarding Personal. Project Lifeline aims to demonstrate and promote these six principles in our work:

Empowerment – People being supported and encouraged to make their own decisions and informed consent

Prevention – It is better to take action before harm occurs.

Proportionality – The least intrusive response appropriate to the risk presented.

Protection – Support and representation for those in greatest need.

Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

Accountability – Accountability and transparency in delivering safeguarding.

Recognising the signs of abuse

Employees, trustees and volunteers are well-placed to identify abuse the adult may say or do things that let you know something is wrong. It may come in the form of a disclosure, complaint, or an expression of concern. Everyone within the organisation should understand what to do, and where to go to get help, support and advice.

Types of Abuse

The Care Act 2014 defines the following ten areas of abuse. These are not exhaustive but are a guide to behaviour that may lead to a safeguarding enquiry. This includes:

Physical abuse - Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

Domestic Violence/ Domestic Abuse - Including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

Exploitation- Including sexual and/or criminal exploitation

Sexual abuse - Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography.

Witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Psychological abuse - Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Financial or material abuse - Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Modern slavery - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and those who coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Discriminatory abuse - Including forms of harassment, slurs or similar treatment because you are, or are perceived to be different due to race, gender and gender identity, age, disability, sexual orientation or religion.

Organisational abuse - Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example or in relation to care provided in one's own home. This may range from one off incidents to long-term ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes or practices within an organisation.

Neglect and acts of omission - Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect - This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Radicalisation to Terrorism

The Government through its PREVENT programme has highlighted how some adults may be vulnerable to exploitation and radicalisation and involvement in terrorism. Signs and indicators of radicalisation may include:

- Being in contact with extremist recruiters.
- Articulating support for violent extremist causes or leaders.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing violent extremist literature.
- Using extremist narratives to explain personal disadvantage.

- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance and/or behaviour.

Reporting Concerns

Any employee, trustee, or volunteer who becomes aware that an adult is or is at risk of being abused must raise the matter immediately with their supervisor or with the organisation's designated safeguarding person. If the adult requires immediate protection from harm, contact the police and Adult Social Care.

Early sharing of information is the key to providing an effective response where there are emerging concerns. To ensure effective safeguarding arrangements, no one should assume that someone else will do it.

Safe Recruitment & Selection

Project Lifeline is committed to safe employment and safe recruitment practices that reduce the risk of harm to adults with care and support needs from people unsuitable to work with them.

Project Lifeline has policies and procedures that cover the recruitment of all Trustees, employees and volunteers. Please see Code of Conduct Policy.

Social Media

All employees and volunteers should be aware of Project Lifeline's Social Media Policy and Procedures and the code of conduct for behaviour towards the adults we support.

Training and Awareness

Project Lifeline will ensure an appropriate level of safeguarding training is available to its Trustees, Employees, Volunteers and any relevant persons linked to the organisation who requires it (e.g. contractors).

For all employees who are working or volunteering with adults at risk this requires them as a minimum to have awareness training that enables them to:

- Understand what safeguarding is and their role in Safeguarding Adults.
- Recognise an adult potential in need of safeguarding and take action.
- Understand how to report a safeguarding Alert.
- Understand dignity and respect when working with individuals.
- Have knowledge of the Safeguarding Policy.

Similarly, employees and volunteers may encounter concerns about the safety and wellbeing of children/young people. For more information about children's safeguarding, refer to The Safeguarding Policy.

Mental Capacity

The MCA defines someone is lacking capacity, because of an illness or disability such as a mental health problem, dementia or a learning disability, who cannot do one or more of the following four things:

1. Understand information given to them about a particular decision
2. Retain that information long enough to be able to make the decision
3. Weigh up the information available to make the decision
4. Communicate their decision.

Refer to the Mental Capacity Act Code of Practice,

<https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice>.

Project Lifeline will need to involve an advocate if the person lacks capacity to make decisions about a safeguarding concern.

Confidentiality and Information Sharing

Project Lifeline expects all employees, volunteers and trustees to maintain confidentiality.

Information will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection.

However, information should be shared with the Local Authority if an adult is deemed to be at risk of harm or contact the police if they are in immediate danger, or a crime has been committed. For further guidance on information sharing and safeguarding see GDPR Privacy Policy.

Recording and Record Keeping

A written record must be kept about any concern regarding an adult with safeguarding needs. This must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made.

All records must be signed and dated. All records must be securely and confidentially stored in line with General Data Protection Regulations (GDPR).

Whistleblowing:

Project Lifeline is committed to ensuring that employees and volunteers who in good faith whistle-blow in the public interest, will be protected from reprisals and victimisation. Please see the Whistleblowing Policy.

Important Contacts:

Emergency – 999

Non-emergency – 101

Telephone: 0808 2000 247

Approval and Review

Approval By M D'Souza

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Lone Worker Policy

Introduction and purpose

This policy sets out the approach that Project Lifeline will undertake in managing lone workers. The Health and Safety Executive (HSE) defines lone workers as “those who work by themselves without close or direct supervision.” Project Lifeline has a legal duty to look after the health, safety, and welfare of its employees, and this includes a duty of care to reduce, as far as reasonably practicable, the risks associated with lone working within the workplace. These duties are set out in the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, and the Safety Representatives Safety Committee Regulations 1977.

Our commitment

Project Lifeline is committed to the provision of a safe place of work for all employees, clients, visitors, contractors, volunteers, and those affected by or involved in organisational activities. We will ensure that lone workers are not exposed to additional or greater risk than any other workers. More specifically, we will ensure that lone workers are identified, hazards and risks are assessed, and appropriate action is taken to reduce these risks.

Policy aim

1. Increase staff awareness of safety issues relating to lone workers.
2. Make sure that the risk of working alone is assessed in a systematic and ongoing way, and that safe systems and methods of work are put in place to reduce the risk so far as is reasonably practicable.
3. Minimise the number of incidents and injuries to staff related to lone workers.

Project Lifeline will take reasonable and practicable steps to manage the risks associated with lone workers. The organisation aims to achieve this by:

- Carrying out suitable and sufficient risk assessments of all lone working activities.
- Implementing control measures identified within risk assessments, to reduce risks to the lone worker to a tolerable level. This includes the use of a regular check in system, and may include the provision of mobile phones, or a lone working personal safety application or device.
- Not allowing any activities to be carried out by lone workers where the risk assessment identifies that there is a significant risk of injury that can only reasonably be controlled by having two or more people in attendance when that activity is performed.
- Providing suitable and sufficient training, information, and instruction to employees with regards to personal safety, lone working, and de escalation techniques. This will be undertaken routinely every 3 years or sooner where incident investigation identifies it as needed.
- Ensuring the reporting of incidents is carried out and, where necessary, investigated.

Roles and Responsibilities

The Chief Executive is responsible for:

- Making sure that there are arrangements for identifying, evaluating and managing the risks associated with lone working;
- Ensuring that reasonable resources are provided to support the implementation of this policy and procedure;
- Making sure that there are arrangements for monitoring incidents linked to lone working and that the Board regularly reviews the effectiveness of the policy.

The Board of Directors are responsible for:

- Providing both written advice and guidance on personal safety and lone working matters.
- Monitoring compliance with, and the effectiveness of, this policy
- Monitoring personal safety incidents and providing annual statistics.
- Ensure the effectiveness of this policy by periodically carrying out lone working audits.
- Advising on the suitability of lone working solutions or buddy systems.

All line managers are responsible for:

- Carrying out a risk assessment and identifying any areas of concern
- Making sure that all staff are aware of the policy;
- Putting procedures and safe systems of work into practice which are designed to eliminate or reduce the risks associated with working alone;
- Making sure that staff groups and individuals identified as being at risk are given appropriate information, instruction and training (e.g. undertaking dynamic risk assessments, using lone worker solution provided, conflict resolution training), including training at induction, updates and refresher training as necessary;
- Making sure that appropriate support is given to staff involved in any incident;
- Managing the effectiveness of preventative measures through an effective system of reporting, investigating, and recording incidents.
- Carrying out disciplinary processes for individuals not adhering to the control measures put in place.

All staff are responsible for:

- Making sure that risk assessments are carried out and reviewed regularly and that they are involved in the process and copied into the risk assessment;
- Taking reasonable care of themselves and other people who may be affected by their actions;
- Co-operating by following rules and procedures designed for safe working;
- Reporting all incidents that may affect the health and safety of themselves or others and asking for guidance as appropriate;
- Taking part in training designed to meet the requirements of the policy;
- Reporting any dangers they identify or any concerns they might have in respect of working alone.

Risk Assessment Procedure

There is no general legal prohibition on lone working; however, the employer

must identify the hazards, assess the risks involved, and put measures in place to avoid or control the risks. If the risk assessment shows that it is not possible for the work to be done safely by a lone worker, then other arrangements need to be put in place.

Risk assessment is an integral management tool that should be completed to ensure that employees are safe in their work. Workplace risk assessments should be completed for each risk profile within the organisation.

While a lone worker risk assessment has been carried out, during lone worker activities, the employee should be reviewing their situation as part of a dynamic risk assessment. If at any time the lone worker is uncomfortable with their position, they should call for assistance or remove themselves from the risk. Personal safety training will cover dynamic risk assessments.

Lone Working Procedures and Processes

Upon completion of the risk assessment document, appropriate control measures should be put in place to manage the risk.

The hierarchy of controls must be used when considering the risk reduction plan, i.e., avoid if possible, assess those activities that cannot be avoided, and reduce the level of risk to the lowest level reasonably practicable ergonomically, through the provision of equipment, information, instruction, and training.

Monitoring and Review

Monitoring Lone Working - Managers may make periodic visits to locations to ensure their workers are safe. They should also regularly check that the measures identified in the risk assessment are in place. For example, checking if lone worker solutions are being used correctly.

Maintaining Contact with Lone Workers

All lone workers must make regular contact to confirm their safety.

While working alone, the employee MUST confirm their safety to the nominated point of contact or safety system at no longer than 2 hourly intervals.

Upon making routine contact, the nominated point of contact or system should record the following:

- Name
- Safety status
- Current Location
- Any other relevant details

Failure to make contact

If the employee has not made contact to confirm they are safe within 30 minutes of the required contact time, i.e., after 2 hours of working alone/2 hours after the last routine check in - the point of contact or safety solution will attempt to contact the employee on their mobile phone. If safety is confirmed, no further action is required. If safety is not confirmed, this should be escalated to

the employees' line manager. Every attempt should be made to contact the employee. If concerns over the welfare of the employee cannot be resolved, the police should be called.

Staff Training

Training is crucial for all groups of staff who undertake lone work, and it is the line manager's responsibility to ensure staff are booked on relevant courses that would enhance staff safety. It is the employee's responsibility to attend any training specific to them, as requested by their manager. Where appropriate, personal safety training will be provided to staff lone workers and cover:

- Advice and guidance not to go into a situation if you feel at risk.
- Use of conflict resolution or defusing techniques. These include being aware of non-verbal communication; how to behave in a non confrontational way; the importance of good customer care; being polite; and listening to young people.
- To be aware of surroundings, your own actions, and how others may perceive you.
- Dynamic risk assessments; If you feel threatened, make your excuses and leave. Make sure you can leave the premises quickly if you need to.

Accident/Incident Reporting

Any accident, incident, or near miss (this includes threats of violence and aggression while lone working) should be reported to a line manager and recorded on the report form.

Review

This document may be reviewed at any time at the request of either staff or management but will automatically be reviewed 3 years from initial approval and thereafter on a triennial basis unless organisational changes, legislation, guidance, or non-compliance prompt an earlier review. All risk assessments must be reviewed at least twice annually or following a change in circumstances, e.g. a reported incident, change in work pattern, etc.

Approval and Review

Approval By M Rodney

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Serious Incident Policy

This policy outlines Project Lifeline's approach to managing and responding to serious incidents involving young people engaged in our programs and services. It is designed to ensure a consistent, timely, and effective response that prioritises the safety, well-being, and best interests of all involved.

Definition of a Serious Incident

A serious incident may include, but is not limited to, the following:

1. Acts of serious violence involving young people
2. Severe injury or death
3. Allegations of abuse or serious misconduct
4. Serious safeguarding concerns
5. Missing or abducted young person
6. Significant damage to property

Procedure for Reporting and Responding to Serious Incidents

1. Initial Response: Upon becoming aware of a serious incident, the staff member must immediately notify their line manager and the designated safeguarding lead. In emergencies, staff should contact emergency services before informing their supervisor.
2. Incident Assessment: The designated safeguarding lead will assess the incident's severity and determine appropriate actions, ensuring that relevant authorities are notified, if required.
3. Support and Communication: Project Lifeline will provide support to affected individuals and families, ensuring clear, sensitive, and timely communication throughout the process.
4. Documentation: All serious incidents must be accurately documented, including details of the incident, actions taken, and any follow-up measures.
5. Review and Learning: Following the incident, Project Lifeline will conduct a thorough review to identify any lessons learned and implement necessary changes to policies, procedures, or practices.

Responsibilities

1. All Staff: All staff members are responsible for reporting serious incidents promptly, cooperating in investigations, and adhering to this policy.
2. Designated Safeguarding Lead: The designated safeguarding lead (Cher Lillie) is responsible for assessing incidents, coordinating responses, and overseeing the implementation of this policy.

3. Management: Project Lifeline's management team is responsible for ensuring the policy's implementation, promoting a culture of safety, and supporting staff in managing serious incidents.

Review and Updates

This policy will be reviewed annually or as needed in response to legislative changes, organisational developments, or learnings from serious incident management. All updates will be communicated to staff, and training will be provided to ensure effective implementation.

Approval and Review

Approval By C Lillie

Date 01/03/2025

Next Review Date 01/03/2026

Board of Directors

Money Handling Policy

Adopted on: 07/07/2025

Next Review Date: 07/07/2026

1. Purpose and Scope

This policy sets out the procedures and principles for handling money within **Project Lifeline** (hereafter “the CIC”). It applies to all directors, staff, volunteers, and anyone handling or managing financial transactions on behalf of the CIC.

The aim is to ensure:

- Financial integrity and transparency
 - Protection of the CIC’s resources
 - Compliance with legal and regulatory requirements
 - Accountability and confidence in the CIC’s financial management
-

2. Legal Framework

This policy complies with:

- **Companies Act 2006**
 - **CIC Regulator Guidance**
 - **HMRC Regulations**
 - Relevant accounting standards and financial controls best practice
-

3. Roles and Responsibilities

3.1 Board of Directors / Trustees

- Set and oversee financial policies and ensure they are implemented
 - Approve annual budgets and financial plans
 - Designate authorised signatories
 - Review financial reports regularly
 - Ensure independent scrutiny of accounts (e.g., examination or audit)
-

3.2 Management

- Implement this policy across operations
- Maintain financial records and ensure compliance
- Prepare budgets, cash flow forecasts, and management reports
- Supervise staff and volunteers handling funds
- Report financial status to the Board regularly

3.3 Staff and Volunteers

- Follow financial procedures at all times
 - Record transactions accurately
 - Promptly report any discrepancies or concerns
 - Only handle money when authorised to do so
-

4. Income Handling Procedures

4.1 Cash Income

- All cash received must be counted in the presence of two individuals
- A receipt must be issued for every cash transaction
- Cash should be stored securely and banked within **three** working days
- Cash income must be logged using the CIC's standard income form

4.2 Cheques

- Cheques must be made payable to the CIC only, never an individual
- Cheques must be logged in the income register
- Deposited to the bank account within **five** working days

4.3 Online Payments and Bank Transfers

- Direct transfers to the CIC's bank account should be encouraged where possible
 - Payments must include reference codes for easy identification
 - All transactions are to be automatically logged via the accounting system
-

5. Banking Procedures

- The CIC shall maintain a business current account in its own name
 - All income must be deposited into this account
 - A minimum of **two** unrelated authorised signatories is required for:
 - Bank withdrawals
 - Online transactions
 - Cheques
 - Signatories must be approved by the Board and updated annually
 - Monthly bank reconciliations must be performed by the finance lead or manager
 - Bank statements must be reviewed and signed off monthly by a director
-

6. Expenditure Procedures

6.1 Petty Cash

- A float of up to £100 may be kept for minor expenses
- All expenditure must be recorded in a petty cash log
- Receipts are required for all petty cash transactions
- The petty cash account is to be reconciled monthly

6.2 Purchase Authorisation

- Expenditure must be within the approved budget
- Any unbudgeted spending over £100 requires Board approval
- Purchases must be authorised in advance by a manager or director
- Wherever possible, suppliers should be approved and regularly reviewed

6.3 Reimbursements

- Staff and volunteers must complete an expense claim form
 - Original receipts or proof of purchase are required
 - Claims must be authorised by a manager
 - Reimbursements will be paid via bank transfer within 14 days
-

7. Financial Record Keeping

- All income and expenditure must be recorded in the CIC's accounting system
 - Records must be:
 - Accurate
 - Up to date
 - Backed up regularly (electronically and/or physically)
 - All financial documentation (invoices, receipts, bank statements) must be retained for at least **6 years**
 - The CIC will produce:
 - Annual accounts
 - Management accounts (quarterly)
 - Annual return to Companies House and CIC Regulator
-

8. Financial Oversight and Audit

- The CIC will appoint an external accountant or independent examiner if necessary
 - Annual accounts will be prepared and filed on time with:
 - Companies House
 - The CIC Regulator
 - HMRC
 - Directors will review financial controls annually and make improvements as necessary
-

9. Fraud Prevention and Reporting

- Financial processes will be designed to prevent fraud (e.g., separation of duties, double sign-off)
 - No one person should complete an entire financial transaction alone
 - All suspected or confirmed fraud or financial irregularity must be reported to the Board immediately
 - The CIC will cooperate with law enforcement or regulatory bodies as required
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10. Review and Amendment of Policy

- This policy will be reviewed annually by the Board
 - Amendments must be approved at a Board meeting and recorded in the minutes
 - All staff and volunteers will be notified of any updates to the policy
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11. Declaration and Approval

This Money Handling Policy was reviewed and approved by the Board of **Project Lifeline** on:

Date: 07/07/2025

Signed: M Rodney

Name: Mark Rodney

Position: Chair
