# Radio City Association C:\Users\Alison Wilson\Downloads\blue\large-blue.jpg

# Radio City Association Safeguarding Policy

## Protecting Children and Vulnerable Adults

**Version number: 1.2**

**Approved by: Radio City Association Board of Trustees**

**Effective from: July 2018**

**Date for review: July 2019**

### Summary of Policy

This policy describes how The Radio City Association (RCA) meets its statutory safeguarding obligations to protect the safety and wellbeing of children and vulnerable adults.

Safeguarding concerns may emerge about the safety and wellbeing of children and vulnerable adults during RCA activities. This policy outlines the procedure to follow if you have a safeguarding concern and how decisions are made.

Note: Terminology in this document considers the legislation of Scotland and refers to ‘children’ as those under 18 years of age as defined in Part 1 of the Children (Scotland) Act 1995 and ‘vulnerable’ adults or groups as those also recognised as ‘protected’ or ‘at risk of harm’.

If you are concerned about the welfare or safety of a child or vulnerable adult, you can contact RCA by email [enquiries@radiocityassociation.co.uk](mailto:enquiries@radiocityassociation.co.uk) or Chairman of the RCA Board and designated Safeguarding Officer Gordon McGuinness by email [Gordon.McGuinness@sds.co.uk](mailto:Gordon.McGuinness@sds.co.uk)

### Introduction

The RCA respects that all individuals regardless of race, gender, disability, religion, sexual orientation, family status, age or social background have a right to equal protection from all types of harm or abuse. Protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, exploitation, victimisation, abuse, neglect, sexual misconduct and violence is fundamental to creating a safe environment. In turn, these experiences impact on the experiences of those directly, or indirectly, affected by such behaviours.

The Chair of the RCA Board, is the Designated Safeguarding Officer. They have overall responsibility for the safety of vulnerable groups in accordance with relevant and current legislation. The RCA Board has oversight of all safeguarding matters and issues relating to protection within the RCA and assists the Chair of the Board in fulfilling the responsibilities as outlined in this Policy.

This policy is informed by Legislation, Guidance and related internal documentation including;

* National Guidance for Child Protection in Scotland 2014

<https://www.gov.scot/publications/national-guidance-child-protection-scotland/pages/0/>

* Protection of Vulnerable Groups (Scotland) Act 2007 <http://www.legislation.gov.uk/asp/2007/14/contents>
* Citizens Advice Scotland - Protection of Adults at Risk of Harm <https://www.citizensadvice.org.uk/scotland/family/help-for-adults-in-the-community-s/protection-of-adults-at-risk-of-harm-s/>
* Modern Slavery Act 2015 <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
* Data Protection Act 1998

<http://www.legislation.gov.uk/ukpga/1998/29/contents>

* Radio City Association Privacy Policy (internal document)
* Radio City Health and Safety at Work Policy (internal document)
* Radio City Disciplinary Policy and Procedure (internal document)

### Types of Abuse

The RCA recognises abusive behaviours can take many forms, including, but not limited to;

* Physical abuse – may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child, young person or vulnerable adult;

* Sexual abuse – forcing or enticing a child, young person or vulnerable adult to participate in sexual activities (including that related to pornography), whether or not the child, young person or vulnerable adult is aware of what is happening;
* Emotional or psychological abuse – the persistent emotional ill treatment of a child, young person or vulnerable adult such as to cause severe and persistent adverse effects on the child, young person or vulnerable adult’s emotional development;
* Neglect – the persistent failure to meet a child, young person or vulnerable adult’s basic physical and/or psychological needs, likely to result in the serious impairment of the child, young person or vulnerable adult’s health and/or development. Ignoring medical or physical needs, not providing access to appropriate care, the withholding of the necessities of life, such as medication, adequate food, water and heating. Ignoring educational needs of a child or young person. Every child has the right to a childhood which develops their personality, talents and abilities to the full.
* Financial abuse – involves theft, borrowing money without repayment and any pressure in connection with wills or property, possessions or benefits.
* Bullying – this is abuse and is a deliberate act or acts designed to intimidate and aggravate a child, young person or vulnerable adult or to undermine self-confidence and self-esteem. It shall be the duty of staff to respond to reasonable concerns about all such abuse.
* Domestic abuse – incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between intimate partners or family members regardless of gender or sexuality.
* Discriminatory abuse - Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunity to some groups or individuals. It can be a feature of any form of abuse, but can also be motivated because of age, gender, sexuality, disability, religion, class, culture, language, race or ethnic origin.
* Modern slavery - Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking

### Principles

The RCA is committed to;

* Providing a safe, secure, welcoming and person-centred environment.
* Promoting the rights, including privacy and dignity, of children, young people and vulnerable adults
* The RCA is an equal opportunity employer and welcomes applications from candidates regardless of background, including those with criminal records in order to tackle recidivism. This will depend on the nature of the position and the circumstances and background of the offence. The RCA will comply fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a disclosure because of a conviction or other information revealed.
* Staff having a clear understanding of their roles and responsibilities in protecting children, young people and vulnerable adults from harm and abuse
* Staff receiving training in recognition of harm and abuse including neglect, bullying and discrimination and following the RCA's procedures in addressing these issues
* As appropriate, and/or required by law, seek to respond to information provided by partner organisations; or self-disclosure by the individual concerned or disclosed by parent/ carer/ advocate and/or by partner/ external agency
* Regular risk assessments in respect of possible abuse being carried out
* Following the RCA's Safeguarding Children, Young People and Vulnerable Adults Procedures
* Issuing a copy of this Policy to external partner agencies and contractors.
* Ensuring that all matters related to safeguarding children, young people and vulnerable adults comply with the Safeguarding Policy.

These commitments will be achieved by following our obligations;

* Safeguarding is everyone’s responsibility; RCA are committed to creating and sustaining a culture of vigilance among our staff to recognise, respond, record and report safeguarding concerns and provide a proportionate response.
* The RCA will promote and safeguard the wellbeing of children, young people and vulnerable adults to ensure that they feel safe and secure and that they are free from exploitation and abuse.
* It is not our responsibility to make judgements about safeguarding concerns reported, but to ensure they are processed and referred on, as appropriate.
* Staff **must** refer allegations; must not investigate and cannot ignore.
* Information and data received as part of safeguarding concerns are handled in confidence and on a need-to-know basis.
* Wherever possible or appropriate, we seek the consent of the subject of a safeguarding concern in order to share their information with an external agency, for example, a social services department.
* This safeguarding policy is updated in line with changes to relevant legislation and best practice across the sector.

In the event that a member of staff is the subject of allegations of abusive behaviour involving children, young people and/or vulnerable adults these will be dealt with within the RCA’s existing Disciplinary Procedures.

The RCA will regard substantiation of such behaviour as example of ‘gross misconduct’ which is likely to lead to dismissal. The RCA will, in the event that it dismisses a member of staff for such proven misconduct, exercise its statutory duty to report such a situation within the terms of the Protection of Vulnerable Groups (Scotland) Act 2007

### Code of Conduct

It is important for all RCA staff and others in contact with children, young people and vulnerable adults to;

* Be aware of situations which may present risks and manage these in an appropriate manner
* Plan and organise the work and the workplace so as to minimise these risks

* Be visible, as far as is possible, when working with individuals within these categories
* Ensure that a culture of openness exists to enable them to raise or to discuss any issues or concerns.
* Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged
* Engage with children, young people and vulnerable adults and encourage them to raise any concerns
* Empower children, young people and vulnerable adults – this will seek to enable them to discuss with staff their rights, what is acceptable and unacceptable, and what they can do if there is a potential problem.

In general it is considered to be inappropriate for a member of staff to;

* Spend excessive or unnecessary time alone with children, young people and vulnerable adults away from others
* Take or invite children, young people and vulnerable adults to their own home
* Place any child, young person or vulnerable adult, that they are working with/ responsible for, in the position of being alone with external parties

In addition, staff must never;

* Hit or otherwise physically assault or physically abuse children, young people and vulnerable adults

* Develop physical / sexual relationships with children, young people and vulnerable adults
* Behave physically in a manner which is inappropriate or sexually provocative
* Have a child, young person or vulnerable adult with whom they are working to stay overnight at their home;
* Sleep in the same room or bed as a child, young person or vulnerable adult
* Act in ways tended to shame, humiliate, belittle or degrade children, young people and vulnerable adults, or otherwise perpetrate any form of emotional abuse
* Discriminate against, show differential treatment towards, or favour particular children, young people and vulnerable adults to the exclusion of others
* Develop relationships with children, young people and vulnerable adults which could in any way be deemed exploitative or abusive
* Act in ways that may be abusive or may place a child, young person or vulnerable adult at risk of abuse.

Staff and others must also avoid actions or behaviour that could be construed as poor practice or as being potentially abusive. For example, staff should never;

* Use language, make suggestions, or offer advice which is inappropriate, offensive or abusive.
* Do things for children, young people and vulnerable adults of a personal nature that they might reasonably be expected to do for themselves.
* Allow inappropriate language or actions to go unchallenged.
* Draw conclusions about others without reasonable cause.
* Condone, or participate in, behaviour of children, young people and vulnerable adults which is illegal, unsafe or abusive.

The RCA recognises the potential impact which the involvement of staff in circumstances where a child, young person or vulnerable adult may have been abused. It will offer any such member of staff support by reference to an Employee Counselling Service or other external support mechanisms (as appropriate).

It should also be clear that the strict application of the Safeguarding Procedures will also protect staff from allegations of abuse.

### Indicators of Abuse

The following list highlights indicators of abuse which might be used by staff to recognise abuse of children, young people or adults. It is important to note that, even though a child, young person or vulnerable adult may be displaying some of these signs or behaving in a way that is causing concern, does not necessarily mean that they are being abused.

Staff will be required to exercise their professional judgement in these respects:

* + Injuries to the child, young person or vulnerable adult that are not consistent with the normal recreational habits of children, young persons or vulnerable adults either in body position or type
  + Inconsistent or unreasonable explanation of an injury by a child, young person or vulnerable adult, parent or carer
  + Inconsistent or inappropriate behaviour such as sexually suggestive remarks or actions, mood swings, uncharacteristically quiet / aggressive, severe tantrums
  + Failing to achieve normal development milestones where there is no good cause for this to be the case
  + Becoming socially isolated
  + Overeating / loss of appetite, weight loss / gain
  + Children, young people or vulnerable adults being inappropriately dressed or ill kept and / or dirty
  + Excuses relating to injuries
  + Self-inflicting injury
  + Open distrust of, or discomfort with, parent or carer
  + Delayed social development, poor language and speech
  + Excessively nervous behaviour such as rocking or hair twisting
  + Exceptionally low self-esteem
  + Flinching when approached or touched
  + Recurring headaches or abdominal pain
  + Reluctance to remove clothing where activities legitimately require it
  + Reluctance to go home
  + This list is not exhaustive.

What to do if you are concerned about the safety or welfare of a child or vulnerable adult

Someone may disclose something which triggers your concern in a variety of settings, It is important that you;

* Listen to what they are saying to you calmly so as not to make them more anxious.

* Respect the person’s right to privacy but do not promise confidentiality - say that you may have to pass on information if a child or vulnerable person is at significant risk of harm.
* Reassure the person that they have done the right thing in telling you this information.
* Make notes as soon as you can, using the exact words that you can remember.
* If you are concerned that a child/young person/vulnerable adult is in possible IMMEDIATE danger please take action to ensure their safety by contacting the Emergency Services by telephoning 999.
* (RCA Staff): You should report details of your concern to a manager, if possible, at the earliest opportunity and then email basic information and your contact details to the Safeguarding Officer (See Contacts). You **must** refer; you must not investigate and you cannot ignore.
* (Other Associates): If you are concerned about the risk to a child/young person/vulnerable adult and do not think they are in immediate danger, email basic information and your contact details to enquiries@radiocityassociation.co.uk.
* The Safeguarding Officer will respond within 24 hours during office hours. They may require further information from the person who has made the initial referral. In the event of an issue outwith normal working hours the please refer to the contact sheet.
* The Safeguarding Officer will seek advice regarding further action required. Following advice they will refer, if necessary, to the relevant Child Protection Agency, Adult Protection Team or the Police.
* The Safeguarding Officer will report back to you and your line management on action taken, as appropriate.

### Promoting Positive Behaviour

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The RCA aims to promote positive behaviour by treating everyone connected with the organisation with dignity, respect, equality and fairness at all times by creating a safe and secure environment free from bullying, harassment and discrimination by ensuring that users are free from exploitation and abuse.

Its staff will achieve this by:

* + Being aware of and complying with the RCA’s Safeguarding Children, Young People and Vulnerable Adults Policy and associated procedures
  + Valuing each person they come into contact with, including children, young people and vulnerable adults, as an individual
  + Ensuring their conduct is always an example of good practice
  + Ensuring their interactions build confidence, encourage and values the contributions of all, including children, young people and vulnerable adults
  + Encouraging the participation of children, young people and vulnerable adults
  + Encouraging children, young people and vulnerable adults to take responsibility for their own behaviour
  + Ensuring they do not demean, belittle or humiliate anyone or label any individual
  + Establishing an appropriate code of behaviour and ensuring that this is consistently applied to all children, young people and vulnerable adults in all circumstances
  + Maintaining a safe environment/ working in a safe manner that is consistent with all relevant legislation and by carrying out regular risk assessments

### Record Keeping

The RCA will maintain records that are required for the efficient and safe management of the organisation and to promote the welfare, care and learning of children, young people and vulnerable adults.

It will ensure that:

* Records will be kept in accordance with the RCA’s Privacy Policy
* Individuals and/or, as appropriate, their parents, guardians and/or carers can access relevant records
* Any such records will be confidential and will be securely stored
* The Data Protection Act 1998 is complied with

### Confidentiality

The effective operation of RCA involves the sharing of information between users and the organisation.

In order to respect the dignity and privacy of all users, the RCA will actively promote confidentiality in the following ways;

* Provide guidelines for staff on required records and reports
* Provide guidance to staff on the handling of confidential and sensitive information
* Provide secure storage for such files and information
* As appropriate, provide parental / guardian / carer access to their own child, young person or vulnerable adult’s records
* Undertake not to disclose confidential information, unless required to do so in matters of safeguarding children, young persons and vulnerable adults or life or death situations.

Staff should not, in any circumstances, offer confidentiality to children, young persons and vulnerable adults who might be in abusive situations. They should, however, offer support to any individual who they believe may be at risk.

Staff should make it clear that they have a legal duty to pass on, and not hold as confidential, disclosures relating to real/ suspected harm/ abuse involving children, young people and/or vulnerable adults.

It should be noted that legislation, including the Data Protection Act 1998, does not prevent the appropriate sharing of information to protect vulnerable individuals as defined in this policy.

# CONTACTS

**Gordon McGuinness**

Chairman of the RCA Board and designated Safeguarding Officer [Gordon.McGuinness@sds.co.uk](mailto:Gordon.McGuinness@sds.co.uk)

For all general concerns or if outwith normal hours please contact : [enquiries@radiocityassociation.co.uk](mailto:enquiries@radiocityassociation.co.uk) and any complaint / allegation will be passed to the relevant authority and you will receive a reply within 24 hours.