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Safeguarding Policy Statement

We, Project Access International, envision a world where passion and potential define a young person's future. To this end, we are **committed** to ensuring the safety and wellbeing of all young people who access our service; and we are **dedicated** to ensuring our safeguarding practices reflect best practice and government guidance, and comply with legal and Charity Commission requirements, both in the UK and abroad.

Project Access International is not a formal education institution, but rather an organisation providing educational services with the help of unaccredited volunteers.

What is Safeguarding?

Safeguarding is everyone's responsibility. Safeguards are defined by the NSPCC as "measures that an organisation should put in place to help reduce the risk of children, young people and adults being harmed." As PA's mentoring and outreach programmes are aimed at both children and adults, some of whom might be considered vulnerable, contextual safeguarding is also a priority for PA. We recognise the vital role we play in our mentees' educational journey, and therefore make sure that children and young people that use our service are safe in all the spaces where they spend their time.

Policy Scope

The following policy applies to anyone involved with Project Access, regardless of where they are in the world. This includes but is not limited to the board of trustees, staff members, volunteers, and interns, whether in the UK or overseas. Because of differing laws across jurisdictions, specific overseas guidance concerning local laws and safeguarding requirements is in the Appendix; these sections supplement, but do not replace, the safeguarding policies and procedures here. This policy should also be read in conjunction with our Best Practice documents.

We believe that:

Children and young people should never experience abuse of any kind. We also believe that to thrive, young people need the following from adults around them:

- **Vigilance:** to have adults notice when things are troubling them;
- **Understanding and action:** to understand what is happening; to be heard and understood; and to have that understanding acted upon;
- **Stability:** to be able to develop an on-going stable relationship of trust with those helping them;
- **Respect:** to be treated with the expectation that they are competent rather than not;
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans;
- **Explanation:** to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response;
- **Support:** to be provided with support in their own right as well as a member of their family;
- **Advocacy:** to be provided with advocacy to assist them in putting forward their views.

We will achieve that by:

- Appointing a Designated Safeguarding Lead.
- Adopting child protection and safeguarding best practice through our policies, procedures and codes of conduct.
- Developing and implementing an effective online safety policy and related procedures.
- Providing effective management for volunteers through support and training so that all volunteers know about and follow our policies, procedures, and behaviour codes confidently and competently.
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance.
- Sharing information about safeguarding and good practice with children, young people, vulnerable adults and their parents / guardians / carers via our website.
- Making sure that children, young people, vulnerable adults and their 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 stakeholders appropriately.
- Using our procedures to manage any allegations against tutors and team members appropriately.
- Building a safeguarding culture where volunteers, children, young people, vulnerable adults, and their parents / guardians / carers, treat each other with respect and are comfortable about sharing concerns.

NB: Children and Young People

Most UK law and the UN Convention on the Rights of the Child are exclusively concerned with under-18s; however, this safeguarding policy is intended to protect young persons throughout their time with PA. Therefore, references to “child/ren” and “mentee/s” in this document refer to any young person that access PA’s services as a mentee.

Contact Details

Project Access International

Name: Taran Glasson

Email: support@projectaccess.org

Project Access Country Teams

Name: *see names of country team contacts in addendums in the Appendix*

Email: support@projectaccess.org

NSPCC Helpline

Phone: +44 808 800 5000

Legislative Framework

Worldwide

The UN Convention of the Rights of the Child empowers anyone who works with a child to do all that is reasonable in the circumstances to safeguard their welfare. Accordingly, PA should take appropriate action wherever necessary to ensure that no child is left in immediate danger.

UK

As Project Access International is a UK-based charity, this policy is based on the following UK laws and guidance:

- UN Convention of the Rights of the Child 1991
- Human Rights Act 1998
- Sexual Offences Act 2003
- The Children Acts 1989 and 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- General Data Protection Regulation, 2017
- Working together to safeguard children (HM Government, statutory guidance 2019)

These laws also apply to Project Access International's operations outside the UK, including its Country Teams and other subsidiary organisations. **UK laws and this Policy will govern our operations online.**

Non-Statutory Guidance

The DfE has published non-statutory guidance for organisations working in out-of-school settings. These will supplement and assist us where possible in drafting this Policy and other procedures.

Overseas

This Safeguarding Policy also applies to PA's operations overseas. For events taking place overseas, a Risk Assessment will be carried out in accordance with this Safeguarding Policy and associated documents as a baseline. Local policies and procedures might supplement, but do not replace, this Safeguarding Policy.

Review

This policy shall be reviewed, approved, and endorsed by the board of trustees annually; or as requested by the Charity Commission or at times of significant legislative changes. The copy of this Policy, signed in ink in the fields below, will be the legally binding copy.

This policy and its appendices have been reviewed and approved by Project Access International's Board of Trustees on this 5th of April in the year 2024.



Emil Bender Lassen
Chair of the Board of Trustees
Date: 05/04/2024



Taran Glasson
Designated Safeguarding Lead
Date: 05/04/2024

Responsible Team Members

Designated Safeguarding Lead (DSL)

Project Access International has one UK-based Designated Safeguarding Lead (henceforth DSL) to ensure that measures are in place to safeguard children within our services. The name and contact details of the Safeguarding Lead can be found at the end of this document. Safeguarding leads must have successfully completed a CPD-accredited Designated Safeguarding Lead Training programme.

They have the following responsibilities:

- Giving advice and expertise on child protection policy
- Acting as a point of contact for all child protection matters
- Developing procedures to safeguard children within Project Access International's services
- Ensuring that child protection is part of Project Access International's risk management strategy
- Promoting good practice and effective communication
- Ensuring that mentors and team members receive effective safeguarding training
- Ensuring all staff that work with children or are likely to come into contact with children are supervised
- Leading on conducting internal case reviews and allegations of abuse
- Supporting any staff member or volunteer raising concerns according to safeguarding procedures
- Supervising and monitoring any reports or referrals made to other organisations on behalf of children.
- Promoting good practice and effective communication on all matters relating to Child Protection on behalf of Project Access International.

Safeguarding Trustee

Project Access International aims to have a designated Safeguarding Trustee as part of their Board of Trustees to support the organisation in delivering on this Safeguarding Policy.

The Safeguarding Trustee's job responsibilities would be:

- To offer frontline, educational, and safeguarding expertise to PA, thereby ensuring the welfare of our mentees is at the centre of PA's focus
- To work with the Designated Safeguarding Lead to advise on safeguarding best practice
- To provide support with safeguarding to other volunteers and the Trustee Board
- To safeguard the good name and values of the organisation.

Working Definitions

Project Access International adopts the following definitions as defined in 'Working Together to Safeguard Children' 2019 and 'Keeping Children Safe in Out-of-School Settings' 2020.

Abuse

A form of maltreatment of a child. Somebody may abuse a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults; or another child or children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent/carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another e.g. where there is domestic violence and abuse.
- Serious bullying, causing children frequently to feel frightened or in danger.
- Exploiting and corrupting children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Sexual abuse includes non-contact activities, such as involving children in looking at, including online and with mobile phones, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

In addition, sexual abuse includes abuse of children through sexual exploitation. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. We will take a zero-tolerance

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy because of maternal substance misuse, maternal mental ill health or learning difficulties; or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected.

Once a child is born, neglect may involve a parent failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers);
- Access medical care or treatment where necessary.

It may also include neglect of, or unresponsiveness to, a child's basic emotional, social, and educational needs.

Other risk indicators

Included in the four categories of child abuse and neglect above, are several factors relating to the behaviour of the parents and carers which have significant impact on children, such as domestic violence. Research analysing Serious Case Reviews has demonstrated a significant prevalence of domestic abuse in the history of families with children who are subject of Child Protection Plans. Children can be affected by seeing, hearing, and living with domestic violence and abuse as well as being caught up in any incidents directly, whether to protect someone or as a target.

Intimate Partner Violence

It should also be noted that the age group of 16- and 17-year olds have been found in recent studies to be increasingly affected by domestic violence in their peer relationships. The Home Office definition of domestic violence and abuse was updated in March 2013 to reflect this: "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence and abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender and sexuality."

This can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional.

Controlling behaviour

A range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim."

These categories of abuse overlap, and a child may suffer more than one form of abuse. Abuse can take place in a family or an institutional or community setting. The perpetrator may or may not be known to the child.

Extremism and Radicalisation

Extremism is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Children in Need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. (Section 17 Children Act 1989).

Significant Harm

Within the UK, the Children Act 1989 introduced Significant Harm as the threshold that justifies compulsory intervention in families in the best interests of children. Significant Harm includes, *but is not limited to*, Abuse, Neglect, Extremism, and Radicalisation in all its forms. There are no absolute criteria on which to rely when judging what constitutes significant harm, and Children in Need have much lower. Sometimes a single violent episode may constitute significant harm but more often it is an accumulation of significant events, both acute and longstanding, which interrupt, damage or change the child's development. (Section 47 Children Act 1989). **Suspensions or allegations that a child is suffering or likely to suffer Significant Harm will trigger PA's safeguarding response.**

Overnight Events

From time to time, PA or its subsidiary organisations may hold events in which children are away from parents or legal guardians for extended periods of time. This includes but is not limited to annual bootcamps, for example. If the event in question lasts at least 8 hours, it shall be considered an Overnight Event for the purposes of this safeguarding policy. Specific safeguarding policies for Overnight Events, as well as training that should be given to those there, shall be considered in Appendix B.

Responding to Concerns

Child or Parent Disclosure

Recognise: If a child or parent discloses Significant Harm or makes allegations, you must:

- listen carefully and sensitively without pressing for information and
- offer the child or parent reassurance that they will be kept safe.

Respond: Your response must be limited to the following:

- Clarifying the concerns
- Offering reassurance on how they will be kept safe
- Explaining what immediate action will be taken
- Seeking medical attention for any serious injuries
- Listening carefully without judging them – remember you are not investigating, only receiving the information.

Please keep the following points in mind:

- You must communicate in a way that is appropriate to age, understanding and preference. This is especially important for children who are uncomfortable with certain methods of communication, or for those whose preferred language is not English.
- You must not press the child or parent for further information, ask leading questions, or cross-examine them under any circumstances, as this may jeopardise police investigation.
- The safety of the child is paramount. Therefore, you must ensure that the child is not left in any immediate danger while decisions and advice are sought.

Report: You must contact the DSL by phone or email immediately after the disclosure; if this is not possible, you must make contact within 24 hours of the disclosure event. This applies even if you think the disclosure poses a minor safeguarding concern or "not worth reporting."

Record: You must keep written records of how you handled this safeguarding concern. Ideally, this should be done confidentially to ensure others do not have access (on paper, secure Apple Notes, or a secure Word document on PA's database). If emergency attention was sought, or emergency

contacts were notified, please record when, why, and who was called. For all discussions, whether emergency or non-emergency, the following written records must also be kept:

- Detailed notes of any discussion with the mentee, mentor, or team member(s) involved
- Detailed notes of information shared to include:
 - o Names and contact details of anyone who received the information
 - o Dates when they received that information
- Any information relevant to follow-up:
 - o Course of action recommended by local authorities (if appropriate)
 - o Whether internal follow-up is required
 - o Future of mentee's/mentor's relationship with PA
 - o Any other communications that might be relevant to the safeguarding response.

Refer: If the person is at immediate risk, you must call emergency services in your area as appropriate. However, please also keep in mind whether it would be appropriate to report certain things to emergency services, in cases where it is not immediately necessary. For non-emergency events, please wait for the DSL's authorization before taking any further action. The DSL will then complete a risk assessment of the situation and decide whether a referral to children's services if necessary. If so, the DSL will coordinate the referral to the relevant local authority department, who have responsibilities for investigation and making enquires in child protection matters.

Review: As someone involved in a safeguarding disclosure, you have an obligation to Project Access International to ensure it was handled correctly. Therefore, we expect that you will participate and review your handling of this event. This may be time-consuming, but **this is a legal obligation and supersedes the "contracted hours" that your volunteer work may be limited to, whether by your volunteer contract or code of conduct. Failure to do this will be grounds to report to Disclosure and Barring Service, preventing you from working with children or young people in the future.**

Within-Organisation Disclosure

Under no circumstances should any staff member or volunteer inflict physical or psychological harm on anyone else. Assault of children is against the law. If any adult causes physical or psychological injury to or mistreats a child, they could be prosecuted for a criminal offence.

The procedure in "Child or Parent Disclosure" also applies if a PA mentor or team member discloses Significant Harm or makes allegations against another person within PA. In this case, the reported to the manager or DSL as appropriate.

Step-By-Step Process

Recognise: If you notice signs of Significant Harm, you must follow the following process:

Respond:

- Be calm and respectful if confronting the young person (take them off to the side, or talk with them privately)
- Ask any questions relating to the abuse
- If action must be taken immediately, explaining what immediate action will be taken
- Seek medical attention for any serious injuries.
- Listen carefully without judging them – remember you are not investigating, only receiving the information.

Please keep the following points in mind:

- You must communicate in a way that is appropriate to age, understanding and preference. This is especially important for children who are uncomfortable with certain methods of communication, or for those whose preferred language is not English.
- You must not press the child or parent for further information, ask leading questions, or cross-examine them under any circumstances, as this may jeopardise police investigation.
- The safety of the child is paramount. Therefore, you must ensure that the child is not left in any immediate danger while decisions and advice are sought.

Report: You must contact the DSL by phone or email immediately after noticing signs of abuse (if necessary, after first calling emergency services); if this is not possible, you must make contact within 24 hours of the disclosure event. This applies even if you think the disclosure poses a minor safeguarding concern or “not worth reporting.”

Record: You must keep written records of how you handled this safeguarding concern. Ideally, this should be done confidentially to ensure others do not have access (on paper, secure Apple Notes, or a secure Word document on PA’s database). If emergency attention was sought, or emergency contacts were notified, please record when, why, and who was called. For all discussions, whether emergency or non-emergency, the following written records must also be kept:

- Detailed notes of any discussion with the mentee, mentor, or team member(s) involved
- Detailed notes of information shared to include:
 - o Names and contact details of anyone who received the information
 - o Dates when they received that information
- Any information relevant to follow-up:
 - o Course of action recommended by local authorities (if appropriate)
 - o Whether internal follow-up is required
 - o Future of mentee’s/mentor’s relationship with PA
 - o Any other relevant communication externally or internally

Refer: If the person is at immediate risk of harm, you must call emergency services in your area as appropriate. However, please also keep in mind whether it would be appropriate to report certain things to emergency services, as this may put them at more risk in certain jurisdictions.

If the person is not at immediate risk of harm, please wait for the DSL’s authorization before taking any further action. The DSL will complete a risk assessment of the situation and decide whether a referral to children’s services if necessary. If further action is necessary, the DSL will coordinate the referral to the relevant local authority department, who have responsibilities for investigation and making enquires in child protection matters.

If outside the UK, the Country Lead is responsible for liaising with local authorities in the country to explain safeguarding concerns in more detail. They will be trained in this by the DSL, as described in the section “Training Team Members and Volunteers.”

Review: As someone involved in a safeguarding concern, you have an obligation to Project Access International to ensure it was handled correctly. Therefore, we expect that you will participate and review your handling of this event. This may be time-consuming, but **this is a legal obligation and supersedes the “contracted hours” that your volunteer work may be limited to, whether by your volunteer contract or code of conduct.** Failure to do this is grounds for termination, as outlined in your volunteer contract; or reporting to DBS, as outlined in Appendix C.

Notifying the DSL

The person to whom the abuse was reported should immediately notify the DSL and their local First Point of Contact (if applicable), of a safeguarding concern via any available method of

communication. These communication attempts must be recorded in keeping with the “Record” step above.

Data Protection

In normal circumstances, agreement must be sought from the named DSL(s) before disclosing confidential information about service users. However, if they are unavailable, information can be shared with first responders in emergency circumstances, in keeping with GDPR legislation.

Training Team Members and Volunteers

Our charity relies on a team of people across the world who are the backbone of what our charity does. To this end, we shall ensure that they are **all** trained in ensuring our mentees’ welfare through this Policy and our procedures. This training may or may not be personally carried out by the Designated Safeguarding Lead; in either case, the DSL will conduct audits and ensure that team members and volunteers are properly trained.

PA country teams are separate legal entities from PA International, so each PA country team is responsible for their own safeguarding processes. Each Country Lead must appoint a Designated Safeguarding Lead. As a minimum, the safeguarding lead from each PA Country Team must have successfully completed a CPD-accredited Designated Safeguarding Lead Training programme. Once trained, they will be ‘first points of contact’ for safeguarding concerns in their country of operation. They will work with the DSL and with local authorities on the DSL’s behalf to handle safeguarding concerns in their respective countries. They will also be responsible for liaising with local authorities, especially where the local language is not English.

Use of School Premises

If school, college, or Local Authority premises are used for Project Access purposes, the premise owner is responsible for following local safeguarding and child protection procedures, including any necessary forms, when they allow PA to use their facilities. The PA International DSL (or DSL for the relevant Country Team) should check that the school, college, or local authority has included safeguarding in their contract with PA, or their Memorandum of Understanding if there is no formal contract. Project Access International must also comply with any terms that the school or college sets to comply with KCSIE.

Appendix A: Funding Providers

As an educational charity that does not charge fees, we are in receipt of grants to sustain our operations. From time to time, PA may receive government grants that require us to comply with specific safeguarding or legal procedures set out by our donors. Conditions attached to any of these grants will add to, **but not substitute**, this Safeguarding Policy.

Appendix B: Overnight Events

From time to time, PA may hold bootcamps or other extended events for our young people, where they will be away from home for an extended period. Any event lasting 12 hours or longer shall be classed as an “Overnight Event.” Because of the higher risk of such events, we included this Appendix to go above and beyond our normal safeguarding procedures.

Anyone who comes into contact with mentees or young persons at an Overnight Event (this includes mentors and volunteers) must successfully complete an enhanced safeguarding training with the DSL, as outlined in *Training Team Members and Volunteers*.

Checklist for Residentials:

- Has the Country Lead attending checked their criminal records to DBS standard? See <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants> for more info.
 - This must be from any country where they have lived for 12 months or more (whether continuously or in total) whilst aged 18 or over.
 - Some countries (e.g., Hong Kong) do not provide a certificate for volunteer positions. In these cases, the Country Lead must give a satisfactory explanation for why they have not provided a certificate.
 - Forward these certificates or documentation to the DSL, along with personal contact details.
- Have **all** volunteers/team members been trained in welfare concerns by the DSL?
 - This training must include information on:
 - preventing bullying, discrimination, sexual harassment, and extremism/radicalisation in line with the Safeguarding Policy above.
 - when and how to contact first aid/parents/guardians in the event of any concerns
- Has a clear timetable/itinerary been drafted for the trip?
- Have consent forms been distributed to those traveling?
 - These consent forms must include information about accommodation and scheduling to ensure there is no ambiguity.
- Has information been collected from all those traveling, to include:
 - Emergency contact details
 - Necessary prescription medication and physicians' information
 - Disabilities, mental health conditions, or other access needs
- Has a Risk Assessment been completed in line with Project Access International's risk assessment template?
 - This Risk Assessment must take participants' disabilities and access needs into account.
- Has the DSL or relevant Country Lead signed off on this risk assessment?
- Do the DSL and Country Lead have access to *all* documents from this process above under GDPR guidelines? Please ensure that consent is sought from all relevant parties.

In most EU countries, it is not legally required to train staff or volunteers on overnight events (Reisenetz 2020); however, Project Access will train all such staff on all overnight events held in line with UK law (and EU data protection laws).

Appendix C: Referring to DBS

If someone inflicts or may have inflicted Significant Harm on children or young persons, Project Access has a legal duty to refer that person to the UK's Disclosure and Barring Services to prevent them from causing further harm in other positions. See <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs> for more details on this process. We also reserve the right to make referrals to police or child protection services in the UK or other jurisdictions where we see fit, and will do so if the subject of a safeguarding investigation refuses to cooperate with us.