

Equity Safeguarding Policy and Procedure 2021

Tower Point HQ 4th Floor, 44 North Road, Brighton, BN1 1YR

1. Our Safeguarding Policy

Safeguarding Definition

Safeguarding is defined by the NSPCC as being the action that is taken to promote the welfare of children and protect them from harm.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Safeguarding applies to all children up to the age of 18 and to some vulnerable adults.

Our Policy Statement

Although Equity does not currently carry out any roles that would be regarded as ‘regulated activities’ as currently defined by the Department of Education, it recognises its responsibilities to do all it can to safeguard young people.

Equity follows best practice standards as detailed by both the Department of Education and NSPCC and regularly reviews and evaluates its practices to ensure continuous learning and improvement. As its legal and policy framework we refer to guidance and principles in both ‘Working Together to Safeguard Children 2018’ and ‘The Children’s Act 1989’.

Our policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all children and vulnerable adults on our trips have a positive and enjoyable experience in a safe and secure environment where we do our utmost to ensure they are protected from abuse or harm; and where any concerns or suspicions relating to any forms of abuse or neglect are reported to the appropriate body.

Our policy also recognises that tourism itself has the potential for placing children in danger of becoming victims of abuse or exploitation. We carefully source reputable and responsible partners to ensure we consider ‘every child, everywhere’ in line with the UN Convention on the Rights of the Child and encourage everyone to take responsibility to recognise, record and report abuse.

Policy Principles

Our policy is to ensure that any incidents or concerns, however minor, are escalated to our Designated Safeguarding Officer promptly with key facts of the situation with as much detail as possible of relevant parties to safeguard@equity.co.uk.

Our principles in enacting our policy are:

- To promote and prioritise the safety and wellbeing of children and young people by taking any concerns seriously, responding promptly with sensitivity and discretion.
- To ensure everyone understands their roles and responsibilities with respect to safeguarding and is provided with appropriate learning opportunities and training to be able to recognise and

report signs of abuse, neglect and other safeguarding concerns relating to children and young people wherever they might encounter it.

- To help our people promote children’s welfare within the tourist industry, working with our suppliers to treat all members of our groups in line with our behaviour codes and to do what we can to prevent child exploitation or underage labour through partnerships with reputable suppliers.
- To ensure appropriate action is taken in the event of allegations, incidents or concerns of abuse or neglect and that the appropriate support is provided to the individual(s) who raise or disclose the concern.
- To minimise risk of the employment of unsuitable individuals by using safer recruitment procedures as recommended by the NSPCC.
- To ensure robust safeguarding arrangements and procedures are in operation including the appointment of a trained Designated Safeguarding Officer and Deputy Designated Safeguarding Officer who are accountable for the implementation of our policy and procedure.

Our policy in relation to expected behaviours and escalation procedures will be widely promoted. Failure to comply with them will be taken extremely seriously and in some circumstances may constitute gross misconduct, leading to dismissal or termination of engagement or employment.

Policy Review

Our policy will be reviewed regularly, at least on an annual basis or as required by changes in UK legislation. Policy reviews may also be undertaken following guidance from either the Department of Education or NSPCC or as a result of any significant change or event that may have taken place.

Approval

This Policy is authorised by:

<p>Signature:</p>  <p>Dated: 22nd September 2021</p>
<p>Nicholas Goodwin Director Equity Inspiring Learning Ltd</p>

Safeguarding Procedure

Procedure for Raising Concerns

Unless it is an emergency, the following procedure will be followed: -

1. Concerns will be raised with the Designated Safeguarding Officer or if unavailable the Deputy Safeguarding Officer who will advise appropriate next steps.
2. The Designated Safeguarding Officer will record details of the concern, any outcome of assessment and actions taken with rationale behind them.
3. All reports, records or forms will be sent to safeguard@equity.co.uk in order that the incident is logged and any appropriate actions followed up promptly as a priority by the right people.

ANY ASSESSMENT SHOULD NOT DELAY A REFERRAL – in an emergency either you or your local Representative should contact the police on the local emergency number.

If you are unsure of whether it is an emergency and/or you cannot reach the Designated or Deputy Safeguarding Officer for any reason but need immediate advice on what to do, the local consulate or embassy may be of assistance and/or the NSPCC can be contacted on 0808 800 5000.

Recruitment and Vetting Procedure

Equity adheres to Safer Recruitment guidelines from the NSPCC which ensures that:

- We do our best to deter any persons likely to abuse from applying to work with us by making our safeguarding practices visible and by having trained members of our People team carry out an initial vetting process through the asking of key questions.
- An individual's identity is verified by a current valid passport (or other approved documentation as set out by the Home Office).
- All prospective employee references are verified, including experience with children.
- All UK staff and those representing us (and where appropriate some tutors) working with school groups will be in receipt of Disclosure and Barring Service (DBS) verification every three years.

Training on Safeguarding

We train all our representatives in customer facing roles on safeguarding to ensure they know how to recognise and report any concern. We also ensure that training takes place for our Contract Managers in relation to working with responsible suppliers.

Both our Designated Safeguarding Officer and Deputy Safeguarding Officer receive regular training by the NSPCC.

Our People team are trained and work to the NSPCC's Safer Recruitment practices.

Media and Publications Procedure

We have specific procedures when children and young people are involved in our publicity. As a rule, we will insist that Party Leaders are responsible for ensuring appropriate application and consent has been obtained from a child's legal guardian prior to Equity's use.

Children and young people's participation in Media/PR may take several forms including:

- Stories and quotes in news releases and publications.
- Images and artwork in news releases and publications.
- Writing articles for use in news releases or publications.
- Being interviewed for newspapers, television and radio programs.

We will ensure that all those participating in our media make an informed decision to publicly share their opinions and/or stories as well as giving their consent. Wherever possible we will endeavor to ensure that their experiences and opinions are represented in their own words.

Finally, if a child or young person was to be interviewed by the press, we will seek additional parental consent and, if their photos are to be included, ensure that this is understood and agreed.

2. Roles and Responsibilities for Safeguarding at Equity

The Safeguarding Team

Our Designated Safeguarding Officer is:

- **Naomi da Costa - Head of People and Health and Safety - Tel No: 07946 663124**
Responsible for all reporting and recording of incidents and preliminary investigations (where appropriate).

Our Deputy Designated Safeguarding Officer is:

- **Charlotte Grimstone – Customer Services Manager - Tel No: 01273 645843**

Their role is to

- Act as the first point of contact for any safeguarding concerns or incidents acting as a source of support and expertise to the referrer.
- Assess the information promptly and carefully, clarifying or obtaining more information where appropriate, and as far as necessary to make appropriate decision or to seek further advice.
- Ensure that preventative measures are in effect and as far as possible ensure that the situation is contained, or risks mitigated to avoid further concerns or distress.
- Make recommendations for change or improvements to our overall safeguarding practices in consultation with the Executive team.
- Ensure any appropriate communications are relayed to the school as appropriate to the situation as soon as possible working with the appointed Designated Safeguarding contact to ensure

appropriate reports are made to the relevant agency in all cases where children or vulnerable adults are thought to be at risk.

- To report any individual staff member, tutor or representative where there are safeguarding concerns involving any form of abuse of trust to the most appropriate local area designated officer.
- To refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service and to ensure records for a period of 10 years.
- To ensure that all safeguarding incidents are anonymously reported to the Board including any further steps or learnings are noted for future.

Our Policy Administrator is:

- **Alice Turner, People Adviser - Tel No: 01273 648258**

Her role is to:

- Oversee and ensure that our safeguarding policy and procedure is communicated on our website and available to all our people, representatives and tutors.
- Ensure all staff, representatives and tutors working overseas receive training in safeguarding at least every 3 years.
- Ensure our recruitment procedure is followed according to Safer Recruitment Standards including where appropriate Enhanced DBS checks are carried out.
- Provide support and assistance to the Designated Safeguarding Officer/Deputy Safeguarding Officer as required.

Appendix 1: Working with Children Code of Conduct for those working for us or on our behalf

Working with children can be enjoyable and rewarding however you must be aware of your behaviour towards children at all times, including when you are not formally working. In order to prevent any misunderstandings and to ensure we meet any obligations in the event that a child raises a concern with you (or where you suspect they are subject to any form of abuse) we set out our expectations.

Behaviours we expect from you

- Treat children with respect at all times.
- Never make suggestive remarks or discriminatory or derogatory comments to a child.
- Never show favoritism towards or reject / exclude any individuals.
- Always challenge unacceptable behaviour and report this to the Party Leader and/or the responsible person..
- Always respect a child's right to privacy at all times. Never enter a room where a child may be changing their clothes or not fully dressed unless you have solid justifiable grounds to suspect an emergency situation and a group supervisory adult is not on hand.
- Never promise to keep a secret of any sensitive information that a child may have disclosed to you.
- Do not engage in or tolerate bullying of any child.
- Unless it is an emergency situation, take all possible reasonable steps to avoid being alone with a child
- Never touch a child unless necessary to do so as part of your normal work duties and then as far as possible where there is another adult present.
- Do not accept any social media requests from a child or exchange personal contact details.

What to do in the case of an incident or you have a concern of any form of abuse/neglect

Should you have any concerns regarding the protection of a child guest from emotional or physical harm, please contact our Designated Safeguarding Officer Naomi da Costa, Head of People and Health and Safety on 07946 663 124 for advice or support.

Follow these three important steps if a child makes a disclosure to you:

1. Make a note of what they have disclosed in writing using their words as far as possible using Equity Safeguarding Incident Report form.
2. Report the matter to the Party Leader (or another teacher if the Party Leader is not appropriate)
3. Report to Naomi da Costa, Head of People and Health and Safety on 07946 663 124 and if unavailable email any report with as much detail as possible to safeguard@equity.co.uk.

Remember:

- Stay calm and listen carefully, providing the child with reassurance that they have done the right thing in sharing the information with you.
- Never promise to keep a secret – it is always best to be honest that you need to share the information with someone who is in a position to give them help and support.
- Ask questions for clarification and understanding only (do not attempt to investigate)

- Make notes as soon as possible afterwards including the date and time of the report including any personal observations which should acknowledge your standpoint rather than being presented as fact.

If you feel that there is any immediate danger or risk of harm to a child, please contact the local emergency services without delay.

Remember RECOGNISE, RECORD AND REPORT.

Appendix 2: Safeguarding Incident Report Form

This form is a structure to record safeguarding concerns.

In an emergency situation where a child immediate welfare is at risk, please do not delay in contacting the police or Emergency services in the destination.

All information relating to safeguarding concerns should be treated in absolute confidence and must be reported to the Designated Safeguarding Officer promptly as a priority.

The form should be completed as fully and as soon as possible following any disclosure or incident with what happened and when. If you give an opinion please give reasons for this view and confirm where it is your judgement or interpretation of events.

Reporter Details:

Name:

Position

Telephone number:

Email address:

School/Group/Supplier

Reference No (if applicable)

1. The details of the individual(s) affected

Name(s)

School/Group/Supplier

Details of the incident – please record all the events including key facts including time, place and actions

2. Others present/or potential witness details

Name(s)

Contact details Telephone number(s)

Contact details Email Address(es)

Is there any further information which might be relevant, helpful or important? Remember that any detail you can provide may be crucial to an investigation so please give us all the information you can.

I have completed this form and provided information which I believe is factually correct; and where my opinion or observations are given, I have stated them as my own judgement.

Printed name (capitals)

Signature

Date