

## E-13 Safeguarding Policy

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### Introduction and Purpose

This policy addresses the expectations, responsibilities, and safeguarding procedures with which we require upReach Employees, Contractors and Volunteers to comply. It is designed to promote the safety and wellbeing of all those involved in upReach activities through compliance with applicable laws and regulations, implementing best practices and robust policies, volunteer training, and volunteer oversight, and to ensure that all those involved with upReach Charitable Company ('upReach') are equipped to take appropriate action in the event of a safeguarding or wellbeing concern.

Substantially all of upReach's activities involve staff working with exclusively over-18s. upReach also works with under-18s in a limited capacity through delivering online webinars, additional safeguarding measures for which are detailed in Section 2 of this document.

upReach does not work with adults known to be at risk; in line with the principles of the 2005 Mental Capacity Act, we assume that adults have the capacity to make their own decisions on matters regarding their safety and how they choose to live. Our safeguarding procedure therefore focuses on taking reasonable action to ensure the safety and wellbeing of all those who engage with upReach activities, including through signposting to other resources and sources of support as appropriate.

This policy is designed to:

1. Promote the safety and wellbeing of Associates/Participants and all those involved in upReach activities;
2. Empower Employees, Contractors and Volunteers to respond in a timely, effective and proportionate manner to safeguarding issues; and
3. Ensure that upReach complies with applicable laws and regulations whilst incorporating and applying current industry best practices.

This policy is not a part of any Employee, Contractor or Volunteer's contract and does not vest any Employee, Contractor or Volunteer with any rights. upReach reserves the right to modify this policy at any time without notice.

### Scope

1. **Applicability.** This policy applies to all upReach Employees, Contractors and Volunteers.
2. **Administration.** upReach's Designated Safeguarding Officer ('DSO') retains primary responsibility for implementing and updating this policy. The DSO's contact information can be found at the end of this document.
3. **Definitions:**
  - a. **Associate.** Any person who meets upReach's eligibility criteria, including completion of all onboarding steps, and has been accepted by upReach to participate in an upReach

programme as a beneficiary. This definition includes Associates who are considered 'dormant' and those who are 'Recent Graduates', but excludes upReach Alumni.

- b. **Contractor(s)**. Any self-employed person providing goods or services to upReach through contract with upReach; also commonly referred to as an 'Independent Contractor.'
- c. **Designated Safeguarding Officer (DSO)**. The named individual(s) responsible for acting as the main source of support, advice and expertise for safeguarding at upReach.
- d. **Employee(s)**. Any person employed by upReach full-time or part-time through an employment contract.
- e. **Incident**. Any event or action that does, or may, result in a safeguarding concern or harm (including physical, mental, or emotional harm) to a person, or otherwise gives rise to a safeguarding issue or concern.
- f. **Mentee**. Any Associate or Recent Graduate who is currently participating in the upReach professional mentoring programme and is actively matched with a volunteer mentor.
- g. **Misconduct indicators**. Any actions or behaviours exhibited by an upReach Employee, Contractor or Volunteer which would indicate a potential safeguarding concern requiring action from upReach.
- h. **Recent Graduate**. Any person who completed their time on the upReach programme as an Associate and graduated from university within the last 12 months.
- i. **Reporting Party**. Any individual who becomes aware of a safeguarding concern and alerts upReach the DSO to the issue.
- j. **Safeguarding**. For the purposes of this policy, the terms 'safeguarding' and 'to safeguard' describe the prevention methods and the precautionary approach to planning and procedures that is needed to protect adults from any potential harm.
- k. **Volunteer**. Any unpaid person assisting upReach with carrying out activities relating to its mission including, but not limited to, mentoring or event volunteers.
- l. **Participants**: refers to any individual, aged 16-18, who attends one or more Webinar within the Aspire Webinar Series.
- m. **upReach Webinar Host**: refers to members of the upReach team who host Aspire Webinars with under-18s in attendance. These hosts will all be required to undergo Enhanced DBS checks and external safeguarding training prior to commencing this responsibility.
- n. **Webinar Speaker**: refers to upReach staff members (other than the upReach Webinar Host) or individuals from selected organisations outside of upReach who may be invited to speak and answer questions on their experiences in a particular sector or to provide expertise on the university application process during one or more Aspire Webinar. These Webinar Speakers will be required to attend safeguarding training from upReach prior to taking part in a Webinar.

## **Policy**

It is the policy of upReach to:

1. Promote the safety and wellbeing of all those involved in upReach activities through compliance with applicable laws and regulations, implementing best practices and robust policies, volunteer training, and volunteer oversight;
2. Ensure all safeguarding concerns and issues are identified and addressed in a timely, effective and proportionate manner;
3. Manage all safeguarding issues and risks using clearly established procedures and protocols; and
4. Ensure that Employees, Contactors and Volunteers:
  - a. refrain from engaging in abusive or inappropriate behaviours directed towards Associates/Participants;
  - b. are adequately trained to identify, and appropriately respond to, safeguarding issues;
  - c. receive adequate support to engage with upReach Associates/Participants in a positive and constructive manner; and
  - d. adhere to upReach policies and procedures.

## **Employees, Contractors and Volunteers**

Employees, Contractors and Volunteers are responsible for:

1. Understanding and implementing this policy and applicable procedures;
2. Ensuring safeguarding issues or concerns are reported and acted upon in a timely manner, while responding sensitively and appropriately to such concerns;
3. Maintaining open lines of communication with the Designated Safeguarding Officer(s) regarding safeguarding issues;
4. Demonstrating appropriate behaviour with Associates/Participants including, without limitation:
  - a. Treating each Associate/Participant with respect and dignity;
  - b. Refraining from discriminating against Associates/Participants on the basis of age, gender, ethnicity, disability, religion, political beliefs, sexual orientation, socio-economic status, or race;
  - c. Maintaining appropriate professional boundaries in relationships with all Associates/Participants and refraining from instigating, engaging in, or continuing intimate or sexual relationships;
  - d. Taking reasonable steps to ensure the wellbeing of Associates/Participants;
  - e. Engaging with Associates/Participants in an open environment and avoiding private or unobserved situations whenever possible;
  - f. Taking reasonable and appropriate steps to protect the privacy and confidentiality of each Associate/Participant, including complying with applicable upReach

policies and regulations, such as the General Data Protection Regulation ('GDPR').

5. Refraining from engaging in, or otherwise displaying, '**Misconduct Indicators**' (see **Definitions** above).

upReach recognises the following non-exhaustive list of actions as indicators of potential safeguarding issues requiring action by upReach. If an Employee, Contractor or Volunteer is found to have engaged in any behaviours suggestive of Misconduct Indicators, this may result in disciplinary action for the Employee, Contractor or Volunteer concerned, and enforcement action for Volunteers.

- a. Engaging in discriminatory behaviour against any person;
- b. Failing to maintain personal and professional boundaries with Associates and/or Participants, including engaging in intimate or sexual relationships with Associates and/or Participants;
- c. Using position or influence to intimidate, threaten, coerce, or undermine an Associate and/or Participant or other Employee, Contractor or Volunteer;
- d. Failing to enforce upReach policies or procedures with an Associate/Participant on the basis of favouritism or an inappropriate relationship with the Associate and/or Participant;
- e. Failing to report inappropriate Associate and/or Participant behaviour or safeguarding risks or concerns in accordance with this policy or training;
- f. Making comments or engaging in discussions, even in jest, that could be construed as abusive or sexually provocative, or which concern sensitive subject matter topics like politics or religion; and
- g. Encouraging or engaging in home visits, outings, or any other communications (including electronic communications) not expected or authorised as part of the professional relationship.

### **upReach Charitable Company**

To ensure the safety of all those connected with upReach, upReach shall:

1. Ensure that suitable training for Employees, Contractors and Volunteers is provided on an appropriate basis;
2. Maintain updated policies and procedures compliant with applicable laws, regulations, and best practice;
3. Maintain a safeguarding log and documentation system;
4. Ensure direct and open lines of reporting for Employees, Contractors and Volunteers to Designated Safeguarding Officer(s);
5. Ensure direct and open lines of reporting to upReach trustees regarding safeguarding issues, including the designated Trustee Safeguarding Lead;

6. Appoint and maintain a Designated Safeguarding Officer and secondary or Backup Designated Safeguarding Officer to implement and ensure compliance with this policy, procedure, and applicable laws;
7. Engage in annual stress testing, audits, or both of upReach safeguarding policies and procedures;
8. Engage in data protection to protect Associate and Participant data in line with other upReach policies and procedures, as well as applicable regulations;
9. Report serious incidents to relevant agencies and statutory bodies, including the Charity Commission.

### **Enforcement**

Any Employee, Contractor or Volunteer violating this policy may be subject to disciplinary action up to and including suspension or termination as well as:

1. Legal action against the Employee, Contractor or Volunteer;
2. Immediate dismissal;
3. Reporting to applicable authorities, including law enforcement.

Any violation of this policy by an upReach Volunteer may result in enforcement actions up to and including:

1. Legal action;
2. Dismissal from the upReach volunteer programme;
3. Reporting to applicable authorities, including the upReach Volunteer's employer and/or law enforcement.

### **Steps to Take in the Event of a Safeguarding Concern:**

#### **Emergency Incidents:**

1. The reporting party will immediately contact emergency services;
2. The reporting party will contact the Designated Safeguarding Officer via phone and then email to report the matter;
3. The reporting party will complete the [Safeguarding Reporting Form](#) and submit to the Designated Safeguarding Officer within twenty-four (24) hours, or as soon as reasonably possible after the event;
4. The DSO, backup DSO, and Chief Executive will meet within twenty-four (24) hours for a Review Meeting to assess the matter and to discuss next steps;
5. The DSO will log in safeguarding database and take action as decided by Review Meeting participants;

6. The Chief Executive will report to Trustee Safeguarding Lead and any statutory bodies as appropriate, including the Charity Commission;
7. The DSO will follow up on a weekly basis or as appropriate with reporting party until issue is resolved or downgraded.

#### **Child or Adult Protection Concerns:**

1. If individual is in immediate danger, the reporting party will immediately contact emergency services, then contact the DSO by phone then email to report the matter. If the individual is not in immediate danger, the reporting party will contact the DSO by phone then email to report the matter;
2. The reporting party will complete the [Safeguarding Reporting Form](#) and submit to the Designated Safeguarding Officer as soon as possible and no more than 24 hours after the incident first occurs or the reporting party becomes aware of the issue;
3. The DSO will contact the local authority safeguarding team and make a referral via within 24 hours of receiving report, following up with written referral;
4. The DSO will complete follow-up actions as guided by the local authority safeguarding team or police as required;
5. The DSO, backup DSO, and Chief Executive will meet within twenty-four (24) hours for a Review Meeting;
6. The Chief Executive will report to the Trustee Safeguarding Lead and any statutory bodies as appropriate, including the Charity Commission;
7. The DSO will follow up on a weekly basis or as appropriate with reporting party until issue is resolved or downgraded.

#### **Allegations Concerning upReach Staff or Volunteers:**

1. The Reporting party will complete the [Safeguarding Reporting Form](#) and submit it to the Designated Safeguarding Officer within twenty-four (24) hours, or as soon as reasonably possible after the event or reporting party becoming aware of allegation. If the reporting party deems it necessary, they should also contact the Designated Safeguarding Officer by phone or email in order to flag the matter;
2. The DSO, backup DSO, Chief Executive and Chief of Staff will meet within twenty-four (24) hours for Review Meeting and to determine next steps;
3. Disciplinary action (in accordance with *E-01 Disciplinary Procedure*) will be taken as appropriate, including internal investigation and suspension if deemed necessary;
4. The Chief Executive will report to Trustee Safeguarding Lead and any statutory bodies as appropriate, including the Charity Commission;
5. The DSO will follow up on a weekly basis or as appropriate with the reporting party until the issue is resolved or downgraded.

**Welfare Concerns:**

6. The reporting party will complete the [Safeguarding Reporting Form](#) and submit it to the Designated Safeguarding Officer within forty-eight (48) hours, or as soon as reasonably possible after the event or the reporting party becoming aware of concern. If the reporting party deems it necessary, they should also contact the Designated Safeguarding Officer by phone or email in order to flag the matter;
7. The DSO will review the Safeguarding Reporting Form within 48 hours of submission, log in the Safeguarding database and confirm classification. The DSO may work with the reporting party to determine next steps;
8. The DSO will follow up as appropriate with reporting party until issue is resolved or downgraded;
9. The DSO will report to the Trustee Safeguarding Lead as appropriate, in line with scheduled Trustee Meeting updates;
10. The reporting party will notify the DSO of any changes to matter which may lead to its reclassification.

**Designated Safeguarding Officer (or Back-up Designated Safeguarding Officer) Actions:**

The Designated Safeguarding Officer upon receiving a report shall:

1. Assess the matter to affirm or reclassify the reporting party's classification;
2. Update the safeguarding log;
3. Investigate and address the safeguarding issue in conjunction with the backup Designated Safeguarding Officer and, if applicable, report the safeguarding issue(s) to Chief Executive, designated Trustee Safeguarding Lead, or both;
4. Determine an appropriate course of action to take, including signposting to any external sources of support such as university wellbeing services or referring to statutory bodies such as local authority safeguarding teams or police, and share this course of action with any relevant individuals;
5. Provide an update on outstanding safeguarding issues to Trustee Safeguarding Lead, in time for each Trustee Meeting; and
6. Organise, file, and maintain the safeguarding log, documentation, and files to ensure accuracy and consistency with the status of the matter.

## **Section 2: Under-18s Safeguarding Policy**

In addition to following the policies and procedures listed above, upReach has additional safeguarding measures in place relating to its work with under-18s.

### **Background:**

upReach works with 16-18 year-olds in a limited capacity through delivering online Webinars, which focus on providing career and further education information. This policy is applicable to upReach staff and external individuals/organisations who are involved in the delivery of such Webinars.

### **Webinar Safeguarding:**

All upReach's sixth-form focused webinars will be delivered via Zoom's Webinar feature, with students registering their interest online via the Aspire website. To eliminate risks of Participants interacting inappropriately with each other, or with Webinar Speakers privately or publicly, participants will only be able to interact with the upReach Webinar Host, and cannot communicate with each other. An individual Participant will not be able to view any details about any other Participants (i.e. name, photo, video, etc). Participants can privately ask questions to the upReach Webinar Host(s) who may, where appropriate, ask the Webinar Speakers to answer the question, but will not identify the source of the question by name.

It is the responsibility of the upReach Webinar Host(s) to report any safeguarding concerns that arise from either the Webinar Speaker(s) or Participants during the broadcast. In the event of a serious safeguarding concern being raised by a Participant, the upReach Webinar Host(s) will take appropriate action as detailed above in Section 1 of this document ("Steps to Take in the Event of a Safeguarding Concern").

### **Data protection:**

All personal data collected for the purposes of Webinar attendance will be processed in line with upReach's full [Privacy Policy & Cookie Policy](#), and deleted within 2 years of Webinar registration.

### **Contact Information**

<b>Position/Title</b>	<b>Responsible Party</b>
<b>Designated Safeguarding Officer ('DSO')</b>	<b>Hannah Stoddart</b>
DSO Email	hannah.stoddart@upreach.org.uk
DSO Phone	07532814196
<b>Backup Safeguarding Officer 1 ('BSO1')</b>	<b>Stephanie Lieber</b>
BSO Email	stephanie.lieber@upreach.org.uk
BSO Phone	07397533195



## References

1. A-02 upReach Privacy Notice & Use of Cookies
2. Data Protection Act 2018
3. The Care Act 2014
4. Mental Capacity Act 2005
5. Safeguarding Vulnerable Groups 2006
6. Working Together to Safeguard Children 2018