

Across the Nations Safeguarding Policy

Version 1.0

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Section 1: Across the Nations Safeguarding

Purpose

Across the Nations (AtN) is a Charitable Organisation that is committed to providing services to remote vulnerable populations overseas including children and families as part of its activities through our network of partners.

The purpose of this policy is to:

- Set out how the charity aims to protect from harm, children and young people who engage with and receive services from the Across the Nation's Charity and its partners
- Provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

The scope of this policy statement

This policy applies to anyone working on behalf of Across the Nations, or its partners, including senior managers and the board of trustees, paid staff, volunteers, children, and young people.

Guidelines

This document is designed to cover our engagement with all children, young people and vulnerable adults including those who are deemed to be at risk. The policy should be read in conjunction with the additional policies and procedures as set out in appendix A.

Policy Statement

AtN believes that 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. We will give equal priority to keeping all children, young people, and adults at risk safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

AtN recognises that children from minority ethnic groups and disabled children often face significant barriers, for example with communication or the impact of discrimination, and thereby have additional needs.

AtN will promote a culture of safety for all and practising this in every aspect of the organisation's day-to-day life. It also involves taking action for and on behalf of children and vulnerable adults who are suffering, or are at risk of suffering, significant harm as a result of abuse, exploitation or neglect.

AtN works with overseas partners and we recognise that cultural norms in these locations can create customs that may appear contrary to our understanding of best practice. We will model high standards and create learning environments to support our partners in improving practice, where necessary, in the best interests of protecting children, young people and adults at risk.

Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in Northern Ireland, Wales, Scotland and England¹. It is also designed to cover operations with our international partners.

We commit to this policy by:

- Listening to children, young people and adults at risk and respecting them. We will do this by holding regular informal sessions for those participating in our activities to gain their perspective, and by holding formal recorded annual reviews with those regularly participating in AtN activities, and those of our partners.
- Appointing a nominated child protection lead for each relevant project and a member of the trustee board who takes lead responsibility for safeguarding at the highest level in the organisation.
- Ensuring that Safeguarding is a standing item on the agenda of all Trustee meetings.
- Having relevant and up to date safeguarding and child protection procedures, which are to be adhered to by our partners, and are available for public scrutiny through our website.
- Making sure all staff and volunteers understand and follow the safeguarding and child protection procedures, and that our partners staff and volunteers are likewise informed and trained to follow them.
- Ensuring children, young people and their families know about the organisation's safeguarding and child protection policies and what to do if they have a concern.
- Building a safeguarding culture where staff, volunteers, children, young people, and adults at risk know how they are expected to behave and feel comfortable about sharing concerns.
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made.
- Recording, storing, and using information professionally and securely, in line with data protection legislation and guidance.
- 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.

Across the Nations Directors, Employees and Volunteers are expected to conduct themselves in a manner consistent with this policy. Any violations of this policy will be treated as a serious infraction and will result in disciplinary action being taken, up to and including termination and any other available legal remedy.

¹ AtN will use the appropriate legislation depending on which nation within the UK the AtN activities are being run. International activities will strive to follow the guidelines of the legislation as laid down in N. Ireland, while also following any national stipulations in that country.

Section 2: Across the Nations Code of Conduct for Staff and Volunteers²

Purpose

Across the Nations (AtN) is a Charitable Organisation that is committed to providing services to remote vulnerable populations overseas including children and families as part of its activities through our network of partners.

This behaviour code aims to:

- Outline the conduct AtN expects from all our staff and volunteers
- Help us protect children and young people from abuse and reduce the possibility of unfounded allegations being made
- Give guidelines and recommendations on working with children, including supervising one-to-one and groups of children
- Look at special cases like early years, those with additional needs and other specific issues.

Scope of this policy

This policy applies to anyone working on behalf of Across the Nations, or its partners, including senior managers and the board of trustees, paid staff, and volunteers.

Guidance

AtN is responsible for making sure everyone taking part in our services has seen, understood, and agreed to follow the code of behaviour, and that they understand the consequences of inappropriate behaviour. To further that, all AtN and partners staff are expected to familiarise themselves with this policy and follow its guidelines. To confirm this all trustees, staff and volunteers must complete the form in Appendix ?? to confirm this.

Please also refer to '**02 AtN Digital Safety Policy**', outlining our policy for e-safety and code of conduct online.

The role of staff and volunteers

In your role at AtN you are acting in a position of authority and have a duty of care towards the children and young people we work with. You are likely to be seen as a role model and are expected to act appropriately.

Responsibility

You are responsible for:

- Prioritising the welfare of children and young people
- Providing a safe environment for children and young people
 - Ensuring equipment is used safely and for its intended purpose

² This policy on a NSPCC Template. Across the Nations would like to thank the NSPCC for making these templates available to the public

- Having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.
- Following our principles, policies, and procedures
 - Including our policies and procedures for child protection/safeguarding, whistleblowing, and online safety
- Staying within the law at all times
- Modelling good behaviour for children and young people to follow
- Challenging all unacceptable behaviour and reporting any breaches of the behaviour code to the AtN Designated Safeguarding Officer (DSO)
- Reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures
- This includes behaviour being displayed by an adult or child and directed at anybody of any age

Rights

You should:

- Treat children and young people fairly and without prejudice or discrimination
- Understand that children and young people are individuals with individual needs
- Respect differences in gender, sexual orientation, culture, race, ethnicity, disability, and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organisation
- Challenge discrimination and prejudice
- Encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Relationships

You should:

- Promote relationships that are based on openness, honesty, trust, and respect
- Avoid favouritism
- Be patient with others
- Exercise caution when you are discussing sensitive issues with children or young people
- Ensure your contact with children and young people is appropriate and relevant to the work of the project you are involved in
- Ensure that whenever possible, there is more than one adult present during activities with children and young people
 - If a situation arises where you are alone with a child or young person, ensure that you are within sight or hearing of other adults.
 - If a child specifically asks for or needs some individual time with you, ensure other staff or volunteers know where you and the child are
- Only provide personal care in an emergency and make sure there is more than one adult present if possible
 - Unless it has been agreed that the provision of personal care is part of your role and you have been trained to do this safely

Unacceptable behaviour

When working with children and young people, you must not:

- Allow concerns or allegations to go unreported
- Take unnecessary risks
- Smoke, consume alcohol or use illegal substances
- Develop inappropriate relationships with children and young people
- Make inappropriate promises to children and young people
- Engage in behaviour that is in any way abusive
 - Including having any form of sexual contact with a child or young person
- Let children and young people have your personal contact details (mobile number, email, or postal address) or have contact with them via a personal social media account
- Act in a way that can be perceived as threatening or intrusive
- Patronise or belittle children and young people
- Make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of children and young people

One-to-one working

There are several measures that should put in place when working alone with a child or young person to make sure both are protected:

- Make sure an appropriate adult, preferably someone with safeguarding responsibility, knows the time and place when the adult is alone with a child
- A suitable venue should be chosen, use a room with windows so people can see in, or leave the door open
- Ensure the young person knows they can stop the one-to-one contact at any time and make sure they know how to complain or get help if they need it
- The adult must keep a record of the fact that they were alone with a child or young person, recording the reason they were alone and describing what happened
- It is important to get appropriate consent when undertaking a one-to-one session. Consent must be sought from a parent or carer if the child is under 18.

In the case of counselling, children and young people may ask the counsellor not to tell their parents about the things discussed in the sessions. However, if the counsellor becomes aware that a child or young person is at risk of significant harm - this information must be shared with the relevant agencies. If the counsellor is unsure whether to report something, they should contact the AtN Designated Safeguarding Officer.

The child (and their parents where appropriate) must be informed before you start that you may not be able to keep information confidential if you need to take steps to protect them

Guidance on appropriate levels of supervision for children and young people

Overview

Supervision levels will vary depending on the children's age, gender, behaviour, and the abilities within your group.

When working with groups of children and young people there must be enough adults to provide the appropriate level of supervision.

Staffing and supervision ratios can sometimes be difficult to judge. There needs to be enough staff and volunteers to ensure children are safe – and that these adults are suitable to undertake various tasks as needed.

The following are is information to help decide how many adult supervisors are needed for a range of activities in different settings.

They will also vary depending on:

- The nature and duration of activities
- The competence and experience of staff involved
- The requirements of location, accommodation, or organisation
- Any special medical needs
- Any specialist equipment needed

A risk assessment must be carried out of the activities being planned, taking these issues into consideration. This will help make decisions about how many adults are needed and what skills and experience they should have.

It needs to be known whether adults are eligible for a vetting and barring check and be clear about any additional safeguards which need to be put in place. For example:

- Ensure adults who do not meet the criteria for a vetting and barring check are being supervised at all times
- Make sure all adults who have contact with children understand and agree to follow the AtN safeguarding policy and procedures

Staff and volunteers need to have:

- An understanding of their responsibility to keep children and young people safe
- Clear procedures to follow if they have a concern about a child's wellbeing
- Insurance for certain activities
- Codes of practice which they understand and agree to follow

Parents who attend activities with their children should not be used to supervise other children unless they have been recruited into the role, undergone the necessary checks and had the relevant child protection training.

Early Years

Key points for all early year's settings include:

- Staffing arrangements must meet the needs of all children and ensure their safety
- Children must usually be within both sight and hearing of staff and always within at least either sight or hearing
- Only those aged 17 or over may be included in ratios (and staff under 17 should be supervised at all times)
- Students on long term placements, volunteers and staff working as apprentices may be included in the ratios if they are old enough and the provider is satisfied that they are competent and responsible

Recommended Guidelines for Adult to Child Ratios

These recommendations are to be taken into account when filling in the risk assessment template for your project of activity. We recognise that these recommendations may be unworkable in some

situations, but we encourage AtN, and partner project, staff, and volunteers to take into serious consideration the reasons for reducing any of these recommendations.

We recommend having at least two adults be present when working with or supervising children and young people. We recommend the following adult to child ratios as the minimum numbers to help keep children safe:

- 0 - 2 years - one adult to three children
- 2 - 3 years - one adult to four children
- 4 - 8 years - one adult to six children
- 9 - 12 years - one adult to eight children
- 13 - 18 years - one adult to ten children

Depending on the needs and abilities of the children, and the nature of the activity, there may need to be more adults than the minimum.

It is recommended to have at least two adults present, even with smaller groups.

If young people are helping to supervise younger children only people aged 18 or over should be included as adults when calculating adult to child ratios.

We recognise that in some overseas settings it can be challenging to remain within these guidelines, and local cultures and customs may question the need for such high ratios. However, we highly recommend our partners to remain within these guidelines unless there are very good reasons not to do so. If AtN suspects that unsafe practises are in operation in any of its partners activities an enquiry will be led by the Designated Safeguarding Officer, and if substantiated will lead us to withdraw from the partnership.

Children with additional needs or disabilities

If working with children and young people who have special educational needs or disabilities (SEND) more supervision may be needed than the minimum ratios above.

For each activity, a risk assessment should be undertaken to help decide on supervision ratios. The assessment should take into account children and young people's behaviour, ability and mobility. As far as possible, include input from children and young people and their parents and carers in risk assessments to ensure children's needs are met.

Toilet ratios

If the group has both boys and girls there should be at least one male and one female responsible adult supervising visits to the toilet.

Adults who have not previously volunteered and haven't had the necessary vetting checks shouldn't be left alone with children or take them to the toilet unaccompanied.

In larger groups of children, groups should be encouraged to take a comfort break together with one responsible adult while the other adult(s) supervises the remaining children and keep a head count.

First aid ratios

We recommend that at least one adult is trained in first aid.

If you are running one-off events you will need to carry out a first aid and medical risk assessment. Many organisations provide medical services but ensure the organisation you select is competent, trained in first aid and able to cope with the demands of your event.

Travelling ratios

When travelling with children and young people the recommended adult to child ratio can vary depending on:

- Size of the group
- Age of the children, their behaviours, and needs
- Size of the vehicle that you are travelling in

If travelling in a vehicle it is recommended that there is one adult driving and one adult supervising the children. Larger groups and vehicles will require more adults to ensure adequate supervision. Think about having one adult driving and at least one adult supervising the children, depending on the size of the group

Section 3: Across the Nations Procedures for Dealing with Disclosures and Concerns Raised About the Safety of a Child or Adult at Risk³

Purpose

Across the Nations (AtN) is a Charitable Organisation that is committed to providing services to remote vulnerable populations overseas including children and families as part of its activities through our network of partners

The purpose of this procedure is to:

- Gives an overview of the background of different types of abuses to be aware of
- Set out what to do if anyone has a concern the safety of a child or adult at risk.

Scope of this Procedure

This procedural document applies to anyone working on behalf of Across the Nations, or its partners, including senior managers and the board of trustees, paid staff, volunteers, children, and young people.

Guidance

Please refer to the [flow diagram](#), found below, which explains the process. Please record any information using the form '[AtN Incident Reporting Form](#)' found in Appendix C of this document.

Children, parents, and carers should also be made aware of their right to raise concerns, and told who they should do that with in each project that AtN or its partners are involved in. Please refer to, adapt as appropriate to the local situation, and make available for anyone the file: '*23 What to do if you have concern template*'

STEP 1: Recognising types and signs of abuse

Types of Abuse

Harm from abuse is not always straightforward to identify and a child or young person may experience more than one type of harm or significant harm. Staff and volunteers need to be familiar with the types of potential abuse and the signs and symptoms associated with them.

Physical Abuse occurs when an adult or other young person physically hurts a child, such as kicks, beats or punches them. Symptoms may include:

- Unexplained recurrent injuries or burns
- Improbable excuses or refusal to explain injuries
- Self-destructive tendencies
- Fear of physical contact, a shrinking back if touched
- Refusal to remove clothing for normal activities or keeping covered up in warm weather.

³ This policy has been compiled from referring to a number of different sources including: RCGP/NSPCC Safeguarding Children Toolkit, City of York' Dealing with Disclosures'; Citizens Advice 'You're Concerned That a Child is Being Abused' and Co-operating to Safeguard Children and Young People in Northern Ireland 2017

- The child appears not to trust particular adults, perhaps a parent or relative or other adult in regular contact.

Emotional Abuse occurs when an adult causes emotional harm by deliberate action or rejection. This may include a lack of love or attention, being made to feel worthless, or being intimidated by threats or taunts. Symptoms may include:

- Delays in physical, mental, and emotional development
- Continual belittling of oneself
- Over-reaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain
- The child appears not to trust particular adults, perhaps a parent or relative or other adult in regular contact.

Sexual Abuse occurs when an adult or other young person engages in unwanted sexual behaviour towards a child. This may involve any form of sexual exploitation including indecent exposure, touching, taking, or using pornographic pictures or videos.

Symptoms may include:

- Sexual knowledge, or language inappropriate for the child's age
- Being over affectionate in a sexual way that is inappropriate to the child's age
- Self-mutilation or suicide attempts
- Running away

Neglect is the failure to provide for a child's basic needs, whether it is adequate food, clothing, hygiene, supervision, or shelter that is likely to result in the serious impairment of a child's health or development. Children who are neglected often also suffer from other types of abuse.

Potential indicators may include:

- Physical indicator such as failure to thrive with no medical cause, poor hygiene, malnourished, soiling /wetting.
- Child's behaviour such as abnormal reaction to separation, poor social skills, overactive or aggressive, demanding of affection and attention, no understanding of basic hygiene.
- Indicators in adults' behaviours such as lacks affection for the child, name calling, puts own needs ahead of the child, mental or physical ill health, aggressive behaviour, learning difficulties.

Exploitation is the intentional ill-treatment, manipulation or abuse of power and control over a child or young person; to take selfish or unfair advantage of a child or young person or situation, for personal gain. It may manifest itself in many forms such as child labour, begging, slavery, servitude, engaging in criminal activity, begging, benefit or other financial fraud or child trafficking. It extends beyond recruitment, transportation, transfer, harbouring, or receipt of children for the purpose of exploitation. Exploitation can be sexual in nature.

Potential Indicators of Exploitation:

- Trafficking: distrust, fear, signs of trauma, passport removed, limited social contact, bonded by debt, do not know where they live.

- Sexual Exploitation: tattoo/ownership marks, limited and sexualised clothing, limited and sexualised language.
- Labour Exploitation: retention of ID/passport, restriction of movement, withholding of wages, threats of harm.
- Domestic Servitude: living and working in a private home, on call 14/7, accusations of theft, not allowed to leave the house without the employer.

Domestic violence and abuse are threatening, controlling coercive behaviour, violence or abuse inflicted on anyone by a current or former intimate partner or family member. It can include psychological, virtual, physical, verbal, sexual, financial, or emotional abuse.

Children may overhear or witness violence in the home. They may also become direct victims, either accidentally or deliberately. The impact of domestic violence on children can lead to physical, psychological, and behavioural disorders.

Self-Harm and Suicide, sometimes young people will deliberately seek to harm themselves. At times this may require urgent medical or psychiatric treatment. Disclosure of self-injury or suicidal thoughts should be reported to the relevant line manager as soon as possible.

Common presentations and situations in which child abuse may be suspected include:

- Disclosure by a child or young person.
- Physical signs and symptoms giving rise to suspicion of any category of abuse and/or inconsistent with the history provided.
- A history which is inconsistent or changes over time.
- A delay by the child, young person, or carer in seeking medical help.
- Extreme or worrying behaviour of a child, taking account of the developmental age of the child.
- Self-harm.
- Accumulation of minor incidents giving rise to a level of concern, including frequent A&E attendances.

Some other situations which need careful consideration are:

- Girls under 16 presenting with pregnancy or sexually transmitted disease, especially those with learning difficulties, chronic long-term illness, complex needs, or disability.
- The child says that she or he is being abused, or another person reports this.
- Disclosure by an adult of abusive activities, including activities related to internet and social media use.
- Reluctance to accept medical help.

STEP 2: Responding to an allegation of abuse from a child

Things to do:

- Listen carefully and accept what the child says.
- Reassure the child that they were right to tell you, and that they are not to blame and take what the child says seriously.

- Try to get the message across that talking is OK. If the child does not mention what has happened again, you can make a general reference to what they have said and use this opportunity to reassure him or her that it is OK to talk about it.
- Inform the child/ young person what you will do next.
- Fully document the conversation on a word by word basis immediately following the conversation while the memory is fresh.
- Fully record dates and times of the events and when the record was made and ensure that all notes are kept securely.

Things to avoid:

- Don't put words into the child's mouth. Ask general questions only (e.g. tell me about that?)
- Don't pressure the child to continue or ask them for more details than they are ready to give.
- Don't question the child in a way that will introduce new words, phrases, or concepts into their minds.
- Don't "correct" or influence the child's information (i.e. "why didn't you tell me sooner"; "why did you let him do it?")
- Don't challenge, confront, or criticise the child's information even if the information seems unlikely or there are obvious errors. Remember children are sometimes unable to give accurate timescales or dates.
- Do not promise confidentiality

Immediate actions:

- Using the form ['AtN Incident Reporting Form'](#) found in Appendix C of this document - record word for word what the child has said
- Referring to the [flow diagram](#) found below in this document, report concerns immediately to your line manager or project leader, if not appropriate or possible then to the AtN DSO who will help make a decision whether to report the matter directly to Social Services or the Police.
- Decide if it is safe for a child to return home to a potentially abusive situation. It might be necessary to immediately refer the matter to social services and/or the police to ensure the child's safety.

Further actions:

- Where emergency medical attention is necessary it should be sought out. If necessary, as ascertained by clinical judgement, the child should be admitted to the care of the emergency Paediatric service and a social services referral made by the line manager or project leader. Any suspicious circumstances or evidence of abuse should be reported to appropriate authorities.
- If a Social Services referral is being made without the parent's knowledge and urgent medical treatment is required, social services should be informed of this need. Otherwise, if it is decided that the child is not at risk, suggest to the parent or carer that medical attention be sought immediately for the child.
- If appropriate the parent/carer should be encouraged to seek help from the Social Services Department prior to a referral being made, be prepared to pass on details if they are needed. If parents do not consent to medical care or to a social care referral and they fail to do so in situations of real concern the safeguarding Lead will contact social services directly for advice.

- Where sexual abuse is suspected the Line Manager / Project Leaders will contact the Social Services or Police Child Protection Team directly. The Lead will not speak to the parents if to do so might place the child at increased risk. The AtN DSO must be contacted within 24hrs and informed of the case if not already involved.
- An action plan should then be decided upon by the Line Manager or Project Leader with the AtN DSO
- A full report is to be written up by either the Line Manager, Project Leader or AtN DSO and stored securely
- A final meeting between the person who raised the concern, their Line Manager or Project Leader and the AtN DSO should be convened within a month of the case being handed on to social services to review the case, ascertain what lessons can be learnt and if any further action needs to be taken

Responding to concerns about a member of staff/volunteer:

- If there is a concern/allegation about a volunteer/member of staff there should be internal discussion with your line Manager or Project Manager (And if not possible then the AtN DSO), and the ['AtN Procedure for Managing and Safeguarding Allegations against Staff and Volunteers'](#) found in section 4 of this document - should be followed.
- Suspicions should not be raised or discussed with third parties other than those named above.

Confidentiality

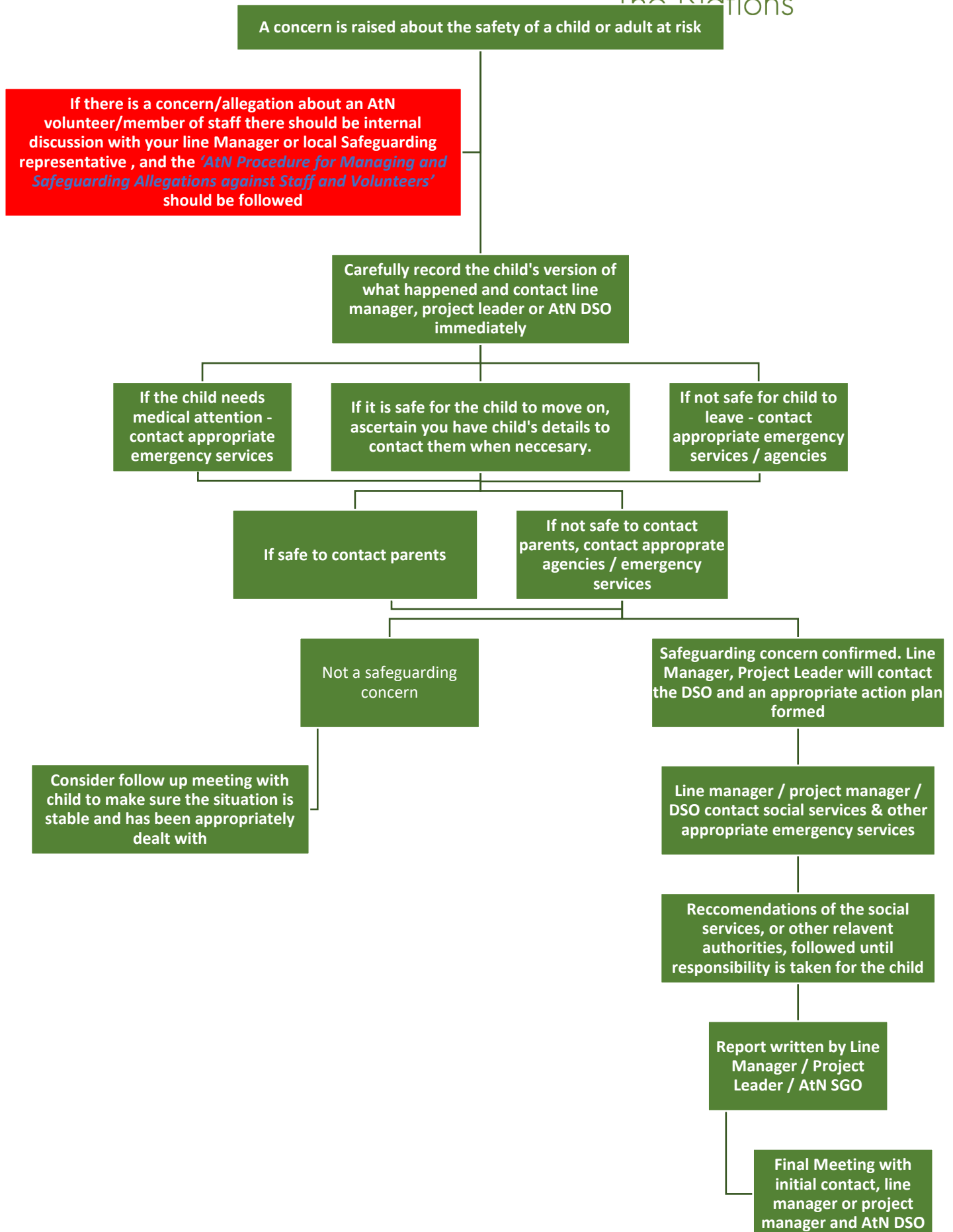
Staff are required to have access to confidential information about children and young people in order to do their jobs, and this may be highly sensitive information. These details must be kept confidential at all times and only shared when it is in the interests of the child to do so, and this may also apply to restriction of the information within the clinical team.

Care must be taken to ensure that a child is not humiliated or embarrassed in any way. If an adult who works with children is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from the AtN DSO. Any actions should be in line with locally agreed information sharing protocols, and whilst the Data Protection Act applies it does not prevent sharing of safeguarding information. Whilst adults need to be aware of the need to listen and support children and young people, they must also understand the importance of not promising to keep secrets. Neither should they request this of a child or young person under any circumstances. Additionally, concerns and allegations about adults should be treated as confidential and passed to the safeguarding lead or appointed person or agency without delay.

Making a direct referral

Any individual staff member or volunteer must know how to make direct referrals to child protection agencies and should be encouraged to do so if they have directly witnessed an abuse action; however, staff are encouraged to use the route described here where possible. In the event that the reporting staff member feels that the action taken is inadequate, untimely or inappropriate they should report the matter directly. Staff members taking this action in good faith will not be penalised.

Flow Chart for Dealing with Disclosures and Concerns raised about the safety of a Child or Adult at Risk



ACROSS

Across the Nations 'What to do if you have a Concern' Template for Projects

The Nations

I have a concern a about a girl	I have a concern about a boy	I have a concern about a staff member	
<p>1. Please contact</p> <p>Name:</p> <p>Email:</p> <p>Other:</p>	Photo	<p>1. Please contact</p> <p>Name:</p> <p>Email:</p> <p>Other:</p>	Photo
<p>2. If I still have a concern, please contact:</p> <p>Name:</p> <p>Email:</p> <p>Other:</p>	Photo	<p>2. If I still have a concern, please contact:</p> <p>Name:</p> <p>Email:</p> <p>Other:</p>	Photo
<p>3. If I still have a concern, please contact:</p> <p>Name:</p> <p>Email:</p> <p>Other:</p>	Photo	<p>3. If I still have a concern, please contact:</p> <p>Name:</p> <p>Email:</p> <p>Other:</p>	Photo
<p>4. If I am still concerned, I can contact the relevant Child Protection and/or Emergency Services at:</p>			
<p>Name of Service:</p> <p>Name:</p> <p>Email:</p> <p>Phone:</p>	<p>Name of Service:</p> <p>Name:</p> <p>Email:</p> <p>Phone:</p>	<p>Name of Service:</p> <p>Name:</p> <p>Email:</p> <p>Phone:</p>	

ACROSS

Other:

Other:

Other:

The Nations

Section 4: Across the Nations Procedure for Managing Safeguarding Allegations against Staff and Volunteers⁴

Purpose

Across the Nations (AtN) is a Charitable Organisation that is committed to providing services to remote vulnerable populations overseas including children and families as part of its activities through our network of partners.

The purpose of this procedure is to:

- Define what is a safeguarding allegation
- Ensure that children and adults at risk are protected and supported following an allegation that they may have been abused by an adult working for or on behalf of AtN
- Ensure that there is a fair, consistent, and robust response to any safeguarding allegation made, so that any risk posed to other children or adults at risk by an abusive individual is managed effectively
- Ensure that an appropriate level of investigation into concerns or allegations takes place when the allegation is recent, or at any time the person in question has been employed or volunteered with AtN
- Ensure that AtN continues to fulfil its responsibilities towards members of staff, or volunteers who may be subject to such investigations
- Ensure AtN acts in accordance with legislation and guidance and the requirements of the Charity Commission

Scope of this Procedure

This procedural document applies to anyone working on behalf of Across the Nations, or its partners, including senior managers and the board of trustees, paid staff, volunteers, children, and young people.

Guidance:

Please refer to the [flow diagram](#) found below - which explains the process. In the case of an allegation, please record any information using the form '[AtN Incident Reporting Form](#)' found in Appendix C

Children, parents, and carers should also be made aware of their right to raise concerns, and told who they should do that with in each project that AtN or its partners are involved in. Please refer to, adapt as appropriate to the local situation, and make available for anyone the file: '[What to do if you have concern template](#)' – found above at the end of Section 3.

Please note: this procedure is separate and in addition to the process for immediate (same day) reporting of serious incident to the AtN DSO on the board of trustees. The DSO expects to receive **on the same day** information that relates to:

⁴ This policy has been adapted from the NSPCC's 'Procedure for Managing Safeguarding Allegations against staff and volunteers.' Across the Nations is very grateful to the NSPCC for creating templates for public use.

- In Children's Services⁵ – a death or serious abuse or neglect in an open or recently closed case
- In the case of Children's Activities – a death or serious abuse or neglect during any activities provided by AtN or its partners

and any

- Death or serious abuse or neglect likely to trigger a Child Safeguarding Case Review or equivalent, and/or likely to trigger media interest (imminently)
- Obvious or apparent AtN serious systems failure e.g. recording system, or serious performance or conduct breach
- Death or serious incident that is very distressing to the practitioners/manager and to whom the trustees might be expected to offer support

This information can be brief rather than a comprehensive report, with further information to follow if and as necessary, making a judgement about what needs to be shared. Same day alerts are the priority. The DSO will then make a timely alert to all trustees.

Roles and responsibilities

In AtN the responsibility for overseeing Safeguarding Allegations and appointing an investigating manager lies with the DSO at the Board of Trustees level.

If they are unavailable the Chairman of the Board of Trustees will nominate another suitable person to undertake this role. If the DSO decides that independence is necessary to undertake an investigation, an independent person, external to AtN will be identified by the DSO to carry this out.

The Investigating Manager will be a person not directly involved in the allegation and someone who has completed the training on this procedure. Further written guidance on the role of the investigating manager and that of line management will be provided.

What is a safeguarding allegation?

Where it is alleged that any person working for or volunteering with AtN has:

- Behaved in a way that has harmed a child, may have harmed a child, or might lead to a child being harmed
- Possibly committed or is planning to commit a criminal offence against a child or related to a child
- Behaved towards a child, children, or adult at risk in a way that indicates s/he is or would be unsuitable to work with children
- Behaved in a way that has harmed, or may have harmed, an adult at risk
- This applies if the allegation is about a current incident or has occurred historically

A child is a person up to the age of 18 years, including any overseas work involving our partners (16 years in Scotland).

The allegation may concern one or more children. The allegation can be about any child/adult at risk, for example a child/adult at risk:

- In receipt of an AtN service

⁵ Children's Services Practitioners are any AtN, or partner project, staff member that is providing therapeutic services to young people through an AtN, or partner project, service, or activity.

- Involved in a fundraising or participation activity
- Not known to AtN
- That a member of staff or volunteer has contact within their community/home life
- Is the son or daughter or family member of the employee or volunteer

The allegation may:

- Not directly identify a known child victim. For example, if a staff member or volunteer is accessing abusive images of children online or using the internet to groom children with the intent to harm in future
- Be about any type of abuse – physical, emotional, sexual or neglect
- Concern a breach of AtN's Safeguarding code of conduct and Policy on appropriate professional conduct
- Relate to AtN staff and volunteers who have behaved in a way that may have harmed an adult at risk
- Allegations of abuse that come to AtN's attention more than twelve months prior to the initial allegation being made are regarded as 'non-recent' abuse, also known as historic abuse. Non-recent abuse allegations against employees or volunteers will be managed through the ['AtN Policy and Procedures for Non-Recent Abuse'](#) found in Section 5 of this document
- Refer above for further information on [how a safeguarding allegation may come to light?](#)

Also consider:

- The importance of referring the allegation onward, the timescales and who to involve
- Understand your responsibilities and limitations for each referral process
- Remember the 4 R's:
 - Recognise concerns that a child is being harmed or might be at risk of harm
 - Respond appropriately to a child who is telling you what is happening to him or her
 - Refer the concerns, where appropriate, to the police or children's social care or (in Scotland) the Children's Reporter
 - Record the concerns appropriately and any subsequent action taken; no delay in passing on concerns. Timescales are in place to ensure that matters are resolved in a timely way, but these are the maximum allowed and nothing should prevent a speedy response if this is required

There may be a need for resolution and escalation – AtN has a responsibility to ensure that appropriate protective action is taken by the police or children's social care and, if not, to escalate the concern to establish the right protective action is taken to ensure the child is safe.

What to do if an allegation is made

If a child or adult at risk, is at risk of immediate harm or needs emergency medical attention, the emergency services must be contacted, and the parents/carers informed that immediate steps are being taken to get help. If the allegation does not relate to an AtN employee or volunteer, all actions taken should follow the procedures as outlined in Section 3 of this document: ['AtN Procedures for Dealing with Disclosures and Concerns Raised About the Safety of a Child or Adult at Risk'](#), or in the case of non-recent abuse in Section 5: ['Across the Nations Policy and Procedures for Non-Recent Abuse'](#).

The person who receives a safeguarding allegation must make a note of the basic details of the allegation using the [‘AtN Incident Reporting Form’](#) found in Appendix C, which includes:

- Name of the individual who the allegation is about and any other identifying information, including location
- Name of any children/adult at risk involved
- Date and time of the allegation arising
- Name and contact details of the person making the allegation
- Key information about the nature of the safeguarding allegation

The person should then inform their line manager in the first instance and agree next steps to safeguard a child/ren or adult at risk. If the concern is about the line manager then the person should inform the DSO.

The line manager, or supervisor must complete the incident form and pass on the information about the allegations within 24 hours to the DSO. If the allegation involves a specifically named child or adult at risk, the DSO will ensure a search of all AtN records is completed, to ascertain whether any records need to be secured or ‘locked down’ or any equipment removed from the individual. Where records are identified, the following process will be followed:

- Where a record relates to an open case, the DSO will action the case to be ‘locked down’ on the relevant recording system, so that previous records cannot be altered, but new information can be added
- Where a record relates to a closed case (not archived), the DSO will ensure the case is “locked down”
- All records will remain secure for the duration of the process of managing an allegation

There may be up to four strands when considering any child protection concern or allegation against a staff member or volunteer, as follows:

- Enquiries and assessment by children’s social care (or equivalent in other nations) about whether a child needs protection and/or services
- A police investigation of a possible criminal offence
- Consideration by the AtN of suspension/disciplinary action in respect of the individual
- Referral for ‘consideration to bar’ a person from working with children/adults at risk (for example, referral to the Disclosure and Barring Service (or equivalent) and/or referral to a professional registration body for professional misconduct

Initial considerations about managing a safeguarding allegation

The DSO will oversee the co-ordination and management of all allegations and must be notified of every allegation. They will have oversight of the investigative strategy and process, the reporting mechanisms to be adopted and will agree who the investigating manager is with the relevant line manager. The investigative task and responsibilities will be delegated to an Investigating Manager unless there are exceptional circumstances, for example where there is a conflict of interest.

If the DSO confirms the information as a safeguarding allegation, an initial plan will be agreed with the relevant Line Manager, Investigating Manager and Country Director within 24 hours, which includes:

- The actions to be taken to address any immediate safety of any relevant child/ren or adult at risk involved, for example those that are the subject of the safeguarding allegation or other children that the individual has contact with through work or family
- The criteria for referral to children’s social care, adult social care, and/or the police

- What information, if any, to share with the individual who is the subject of the safeguarding allegation, and when to do so
- Whether any immediate decision must be taken about suspension of the individual subject to the allegation, pending further enquiries and/or investigation
- What further information may be required for clarification
- Identifying who else is aware of the safeguarding allegation and who has been spoken to
- Identifying whether any advice should be sought from an external consultant
- Consideration of support arrangements for the child/ren, adult at risk and family members concerned
- Arrangements for support for the person who is the subject of the safeguarding allegation and the person who raised the allegation
- Additional advice from legal experts may need to be considered

If after the initial assessment the DSO does not consider the matter constitutes a safeguarding allegation then they must decide in consultation with the relevant managers if an internal investigation is required to determine if the behaviour/incident was related to poor practice or misconduct in which case the disciplinary policy will be instigated by the line manager. All decisions and the reasons for them must be recorded.

If the matter constitutes a safeguarding allegation, then the Investigating Manager must make a referral to the Designated Officer for the Local Authority or equivalent in the devolved nations or overseas partners operating country within 24 hours of the allegation coming to light.

Should an external child protection investigation and/or police investigation be required then this will be undertaken before any internal AtN procedures are actioned. Please refer to point 7 below - this does not apply to a decision to suspend or re-deploy. The Investigating Manager must also refer to and follow the relevant Safeguarding Board procedures to understand and ensure compliance wherever possible with local arrangements for the management of safeguarding allegations, including timelines.

Action following initial consideration

Where the allegation meets the criteria [\(outlined above\)](#), the Investigating Manager and the Designated Officer for Local Authorities (DOLA) will discuss and agree the next steps, including informing parents/carers of the child or adult at risk concerned (if applicable) about the allegation if they are not already aware of it.

The DOLA (or equivalent) will:

- Discuss with the Investigating Manager the allegation and obtain further details of the allegation and the circumstances in which it was made
- Discuss whether there is evidence/information that establishes the likelihood that the allegation is false or unfounded
- Convene a strategy discussion within procedural timelines in order to plan any actions such as a police investigation and/or protective action in respect of the child or adult at risk if there is reason to suspect a child or adult at risk is suffering or likely to suffer significant harm, and/or a criminal offence may have been committed

The member of staff/volunteer subject to the allegation should be informed by an appropriate manager that an allegation has been made and the Managing Safeguarding Allegations Information Letter with the additional documents identified within it sent out to him/her. However, where a

strategy discussion is required with the authorities, or the police or children's social care (or equivalent) may need to be involved, information about the allegation should not be shared until those agencies have agreed what information can be disclosed to the person who is the subject of the allegation.

Allegations against Senior Managers

If a safeguarding allegation is made against a Senior Manager, the DSO should immediately be informed, and the above procedure will be followed.

If an allegation is made against a trustee, it is the responsibility of the chair of trustees and the DSO for agreeing an initial plan of how to proceed. If one of them is the subject of the allegation their place will be taken by a vice chair of trustees, or another trustee, respectively. The DSO will confirm that the information before them is a safeguarding allegation. The safeguarding allegation may be in respect of the person's employment, voluntary activity or behaviour towards any children including their own.

If after the initial assessment, the chair (or vice chair), the lead trustee or other trustees decide that the matter does not constitute a safeguarding allegation then they must decide if an internal investigation is required to determine if the behaviour/incident was related to poor practice or misconduct.

If it is agreed that the safeguarding allegation meets the criteria [\(outlined above\)](#), then the delegated Investigating Manager must make a referral to the Designated Officer for the Local Authority or equivalent in the devolved nations or partners operational country within one working day. Some safeguarding allegations are clearly so serious that they require immediate referral to children's social care/police. Other allegations that appear to meet the criteria may seem less serious; it is important that they are followed up and examined objectively by the external authorities who may hold other relevant information about the individual that is unknown to AtN.

All decisions and the evidence upon which they are based must be recorded.

Suspension

In some cases, AtN will decide to suspend the employee who is the subject of the allegation or cease to use the services of a volunteer on a temporary basis.

The act of suspension does not indicate a person's guilt, it is a neutral act. An individual must not be suspended automatically when there has been an allegation or without careful thought. Suspension should be considered in any case where:

- There is reason to suspect a child is at risk of significant and the allegation warrants investigation by the police
- The allegation is so serious that if substantiated might be grounds for dismissal
- There are concerns that the person about whom the allegations are made may put pressure on or interfere with potential witnesses
- The person by carrying out their normal duties may pose a risk to others and where this risk cannot be reasonably mitigated against through increased supervision or a temporary change of duties

The power to suspend a member of staff or dispense/suspend the services of a volunteer because of an allegation is vested in the AtN alone. In making this decision the Investigating Manager in

conjunction with the DSO will need to take into consideration the views of the police and the DOLA. The Investigating Manager should also consult with the line manager of the staff member or volunteer.

The Investigating Manager, in consultation with the above persons, will be responsible for deciding how and when to feedback to the person who made or received the allegation, and what information to give to relevant others who may know the accused individual concerned. Advice and consultation on this may be sought from the DSO.

If it is decided to proceed with a suspension the guidance for Managing the Reporting Process to Regulatory Bodies for Social Workers in the UK Guidance must be referred to and the Fitness to Practice (FTP) of the employee assessed in line with this guidance. Other regulatory bodies may need to be considered⁶.

Action following the conclusion of the external investigative process

At the conclusion of any external investigations, the DSO and the DOLA, will formally review the outcome and determine any further action required. Following completion of the internal investigation the Investigating Manager will complete a report detailing the relevant information, their actions, and any recommendations.

The line manager of the staff member or volunteer will need to be party to any decision. Options include:

- Reintegration of the staff member or volunteer
- Performance management or capability processes invoked
- Disciplinary process invoked, following the Disciplinary policy
- Referral to the Disclosure and Barring Service (DBS) (equivalents in other nations) for consideration to be barred from working with children
- Referral to a professional registration/regulatory body, for example the Health Care Professions Council (HCPC), on the grounds of misconduct

The following definitions will be used by the Investigating Manager when recording the outcome:

- **Substantiated:** there is sufficient identifiable evidence to prove the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Malicious:** there is clear evidence to prove that there has been a deliberate act to deceive and the allegation is entirely false
- **Unfounded:** there is no evidence or proper basis that supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances
- **Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove the alleged behaviour occurred

Every effort should be made to reach a conclusion in all cases even if:

- The individual refuses to cooperate, although s/he should be given a full opportunity to answer the allegation and make representations

⁶ Professional Registration Bodies include: Health and Care Professionals Council (England); Scottish Social Services Council; Care Council for Wales; NI Social Care Council, Nursing and Midwifery Council. This could include local or other international equivalents in the case of International Partners.

- It is difficult to reach a conclusion
- The staff member is no longer employed, or the volunteer has withdrawn his/her services

The Investigating Manager must determine who needs feedback following the conclusion of any investigations and the nature of that feedback in accordance with the principles of data protection and confidentiality. This might include feedback to the child, adult at risk, his/her parents/carers, and/or the person who raised the concern initially, and the line manager of the staff member or volunteer.

The Investigating Manager must provide in writing feedback to the person who has been subject to the investigation, clarifying the outcome and any implications for their employment/volunteering. This should normally be provided within five working days of the conclusion of the investigation.

Action in Respect of Unfounded or Malicious Allegations

If an allegation is determined to be unfounded or malicious, the Investigating Manager must consider if any further action is required to include:

- If the safeguarding allegation was made by a child then there is a need to consider if a referral to children's social care is required to determine if that child is in need of services, or may have been abused by someone else
- If the safeguarding allegation was deliberately invented or raised maliciously by an adult, then this could be discussed with the police and advice sought
- Whether disciplinary action is required, If the person making the malicious or unfounded allegation is a member of staff
- The support needs of the person that was the subject of the safeguarding allegation

Learning Lessons

At the end of the process of managing an allegation and its conclusions, the Investigating Manager is responsible for the identification of any lessons to be learned about the procedure, the actions taken, and the support offered. This learning should feed into policy and procedural revisions as well as the safeguarding learning and development strategy.

Adults at risk

There may be occasions where the allegations against AtN staff or volunteers concern an adult at risk. This may include but is not restricted to where a member of staff or a volunteer has:

- Behaved in a way that has harmed, or may have harmed, an adult at risk
- Possibly committed a criminal offence against or related to an adult at risk
- Behaved towards any adult at risk in a way that indicates s/he is unsuitable to work with adults at risk
- These include concerns relating to inappropriate relationships between members of staff and an adult at risk they are working with such as:
 - having a sexual relationship with an adult at risk if in a position of trust even if the relationship appears consensual
 - the sending of inappropriate text/e-mail messages or images, providing gifts, socialising
 - Possession of indecent photographs/pseudo-photographs of adults at risk
- If a crime is suspected a report must always be made to the police

How might a safeguarding allegation come to light?

A safeguarding allegation may arise when:

- a child or parent/carer makes a direct allegation against an individual
- a child or parent/carer expresses discomfort with the behaviour of an individual
- a staff member/volunteer directly observes behaviour that is cause for concern
- AtN receives a safeguarding allegation from a person, including a member of the public or professional
- a member of the public or professional tells an employee or volunteer face to face
- during another internal procedure, for example a disciplinary or someone whistleblowing (speaking out) or making a complaint
- AtN is informed by the police or local authority that an individual is the subject of a child protection and/or criminal investigation
- information emerging from the renewal of a DBS/Disclosure Scotland, Access Northern Ireland (NI) or other international check indicates that a staff member or volunteer may have committed an offence or been involved in an activity that could compromise the safety of a child/ren
- a staff member or volunteer informs AtN that they have been the subject of allegations, have harmed a child, or committed an offence against or related to a child
- another employer/organisation informs us that an AtN staff member or volunteer is the subject of a safeguarding allegation within their organisation
- AtN is informed by the Health and Care Professions Council (or equivalent⁷) that an individual is the subject of a child protection and/or criminal investigation

The managing safeguarding allegations procedure must be followed consistently in all instances, regardless of how the safeguarding allegation arises or from whom, or whether it is shared with AtN by email, face-to-face contact, social networking, telephone, or letter. See [‘Process flowchart: Managing Allegations Against Staff Process’](#) – found below.

Support

In managing any allegation there is a need for the DSO and any Investigating Manager to consider the support needs of individuals involved. The support they require depends on the circumstances of the case and will have to be negotiated and agreed on a case-by-case basis. Support may include responding to the impact from shock, anger or being a suicide risk, for example. It may include support for the:

- person who raised the concern at the outset
- person who is the subject of the allegation
- child/parents/carers, if applicable, where harm was alleged against a particular child

The Investigating Manager is responsible for ensuring that the staff member or volunteer who is the subject of the allegation is:

- informed of the allegation against them (once agreed by the DOLA and police), notified of the processes that will follow and signposted to independent support should they require it, for example the Employee Assistance Programme
- kept up to date about any progress in relation to their case

⁷ Scottish Social Services Council, Council Care for Wales and Northern Ireland Care Council

- advised to contact their union or professional association at the outset
- informed of arrangements to keep him/her updated about developments in the workplace in cases where the staff member is suspended, or AtN has ceased to use his/her services as a volunteer
- Sent correspondence confirming all the above including the arrangements for support.

Recording and record keeping

It is essential that AtN keep a clear and comprehensive record of any concern or allegation made against an individual, including details of how the allegations were followed up and resolved, and details of the decisions reached and any action taken. The purpose of the record is to:

- enable accurate information to be given in response to any future request for a reference
- provide clarification in cases where a future DBS (or equivalent) disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction
- prevent unnecessary re-investigation should an allegation resurface after time
- provide evidence and information if a decision is made to refer the person for consideration to be barred from working with children and/or adults
- enable AtN to review and improve policies, procedures and practice based on learning and feedback

The Investigating Manager is responsible for creating and maintaining the record whilst managing the allegation. They must use the '[AtN Template Management of Allegation Log Form](#)' found in Appendix F - for this purpose.

The allegation log form must be updated no later than monthly and at the conclusion of the allegation management process. Instructions are on the allegation log form as to whom it needs to be shared with.

Additional records e.g. e-mails, hard copy documents are likely to be created as part of the investigation process. Summaries of the content of these will be recorded in the allegation log completed by the Investigating Manager. At the end of the investigation the Investigating Manager will create a zip file of all emails including scanned copies of all hard copy documents. The zip file must be appended to the allegation log by the Investigating Manager. All e-mail data gathered locally as part of the investigation should be deleted from local systems six months post the outcome of the investigation. All original hard copy documents should be immediately destroyed (post scanning). No investigation data should be kept locally after six months.

At the end of the process of managing an investigation and any subsequent disciplinary, the Investigating Manager must gather all the records, relevant paperwork, and correspondence for secure storage. The Investigating Manager must ensure that the information is passed to the AtN DSO to ensure that the individual's personnel file can be updated.

Records of all allegations and subsequent processes must be retained securely on an individual's personnel file and should be held in a restricted section of the personnel file. The record should be retained until the person has reached normal retirement age or for a period of 10 years. The file shall be stored safely and with restricted access in the AtN SharePoint site.

Secured records managing an allegation can be unsecured once the process has been concluded.

The AtN DSO is responsible for collating all safeguarding allegations concerning staff members, volunteers and others, its management and storage. The Head of Safeguarding is responsible for producing an annual summary of information and statistical reports on all allegations made against all staff in AtN.

Referral for consideration to bar and/or professional de-registration

Once the outcome of the allegation management process, is concluded, there are two key decisions to be made by the Investigating Manager in consultation with the DSO.

Where a staff member or volunteer is engaged in providing 'regulated activity' then the issue of whether they are allowed to continue with this must be considered by the Investigating Manager depending on the outcome of the investigation /disciplinary process. If it is concluded that the person should no longer be engaged in regulated activity then AtN must refer the employee/volunteer to the DBS/Disclosure Scotland/Access NI or relevant international body for consideration to bar the person from working with children and/or adults at risk.

Where a staff member or volunteer is registered with a professional body (e.g. HCPC), the issue of referral of the staff member or volunteer to the professional regulatory body must be considered by the Investigating Manager in consultation with the AtN DSO.

These decisions must be made even if the staff member has resigned or the volunteering activity has ceased.

Referral for consideration to bar

The Investigating Manager will need to review the latest information on referral for consideration to bar from the relevant website, as there are differences in the requirements and timescales within each nation.

[Disclosure and Barring Service \(England and Wales\)](#)

[Disclosure Scotland](#)

[Access NI](#)

Referral to DBS

AtN is under a legal duty to refer an individual to the DBS for consideration to bar where a person engaged in *relevant conduct* has:

- harmed or poses a risk of harm to a child
- Satisfied '*The Harm Test*'; or received a caution or conviction for a *relevant offence*

Relevant conduct in relation to children

Conduct that:

- endangers a child or is likely to endanger a child
- if repeated against or in relation to a child, would endanger the child or be likely to endanger the child
- involves sexual material relating to children (including possession of such material)
- involves sexually explicit images depicting violence against people including possession of such images)

- Is of a sexual nature involving a child

A person's conduct endangers a child if they:

- harm a child
- cause a child to be harmed
- put a child at risk of harm
- attempt to harm a child
- incite another to harm a child

'The Harm Test' in relation to children

A person may satisfy 'The Harm Test' if they:

- harm a child
- cause a child to be harmed
- put a child at risk of harm
- attempt to harm a child
- incite another to harm a child.

Relevant Offence, for example an offence of serious violent or sexual nature.

If a decision to refer to the DBS is agreed, then the referral must take place within one month of the final outcome of the disciplinary.

Reports for consideration to bar must be completed in the required regulatory format by the Investigating Manager. The referral form will require detailed information including:

- the details of the person being referred
- the person's qualification and training history
- details of the work the person undertook
- the reason for referral
- the chronology of events
- details of the child harmed or put at risk of harm, relevant supporting documents, for example agency procedures, code of conduct
- Referrer's details and declaration

The Investigating Manager must inform the person of the decision to refer, and explain the process, including the right of appeal, and signpost the person to appropriate support and advice.

The Investigating Manager will be advised by DBS/Disclosure Scotland/Access NI of the process of their decision making and eventual outcome. The Investigating Manager must ensure that a record of the outcome is made on the personnel file of the individual.

A barred individual cannot be employed in a regulated position. If an individual becomes barred and is still in the employ of AtN then either the person must be redeployed to a post that does not involve work or contact with children, or, if this is not possible, terminate the person's contract. The decision on this matter rests with the DSO and the relevant Country Director or Line Manager.

Referral to a professional registration body (e.g. The Health Care Professions Council)

The AtN DSO will need to establish early on in the investigative process if the employee or volunteer is registered with a professional regulatory body⁸ and the criteria for when that body needs to be notified of possible misconduct (referred to as 'Fitness to Practice' by a registered member).

For further information on this process, please refer to the Professional Standards Authority for guidance on reporting to professional regulatory bodies: <https://www.professionalstandards.org.uk/>

Managing allegations against interns, secondees, agency staff, students, contractors and sole traders

Where a safeguarding allegation arises regarding any of the above individuals, the line manager/responsible supervisor must notify the DSO as per the procedure.

In circumstances where the individual is employed and/or a member of a third-party organisation (e.g. employment agency, university), in addition to the DSO making a referral to the DOLA (or equivalent in the devolved nations⁹ or international setting) within 24 hours of the allegation coming to light, the third-party organisation should also be notified. The third-party organisation will be responsible for the individual's support arrangements.

In making a referral and in consultation with the third-party organisation, suspension or cessation of the individual's services must be considered as per the procedure

Resignation and Settlement Agreements

The fact that a person tenders their resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the person should be given a full opportunity to answer the allegation and make representations about it. Where this is not possible for example if the person is unwilling to co-operate, the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be regarded as substantiated on the basis of all the information available should continue. It may be difficult to reach a conclusion in these circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible. The individual should be made aware that if they leave and the investigation is incomplete it may be referred to in a reference.

AtN never agrees to the use of a 'settlement agreement' with an individual in these circumstances. This is where the employee subject to the allegation agrees to resign, the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in future references. Nor can it be used to override AtN's statutory duty to make a referral to the DBS (or equivalent in

⁸ Professional Registration Bodies include: Health and Care Professionals Council (England); Scottish Social Services Council; Care Council for Wales; NI Social Care Council, Nursing and Midwifery Council etc

⁹ The role of the DOLA exists in England only. Therefore, in the other nations refer to social services (Wales) or Health and Social Care Board (NI) or Social Work Offices (Scotland) or Children's Services (Jersey) or seek advice from the LSCB/Child Protection Committee

other nations) where they meet the criteria for consideration to bar them from working with children.

Referral to the Charity Commission

There are three criteria for reporting serious incidents of abuse or mistreatment to the Charity Commission (ref). The criteria are in bold font below.

‘Beneficiaries of your charity (adults or children) have been, or alleged to have been, abused or mistreated while under the care of the charity, or by someone connected with the charity, for example a trustee, staff member or volunteer’.

All allegations and the report of the outcome of the investigation are referred to the Charity Commission i.e. whether or not it has been substantiated. If the outcome of an investigation is known within a few days of the allegation being made, the report of the allegation and the outcome can happen simultaneously. ‘Under the care of’ is on AtN premises or during an individual or group session at another venue including the family home.

‘There has been an incident where someone has been abused or mistreated (alleged or actual) and this is connected with the activities of the charity’.

An example is abuse of a child or adult at risk by someone at an event held on behalf of the charity e.g. a fundraising event when those attending are donors rather than beneficiaries. Another example might be when AtN may have to provide child-care or incidental activities other than for beneficiaries.

‘There has been a breach of procedures or policies at the charity which has put beneficiaries at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or adults’.

When a breach of AtN procedures or policies has, or may have, put beneficiaries at risk a local or national safeguarding practice review must be conducted. The DSO must report at the outset of the review and update the report when the review is concluded.

There is no requirement to report when practitioners are brought before a regulatory body and struck off for reasons that may have put children at risk but not to the extent of having caused harm and triggered a safeguarding practice review.

For further information

<https://www.gov.uk/government/organisations/charity-commission>

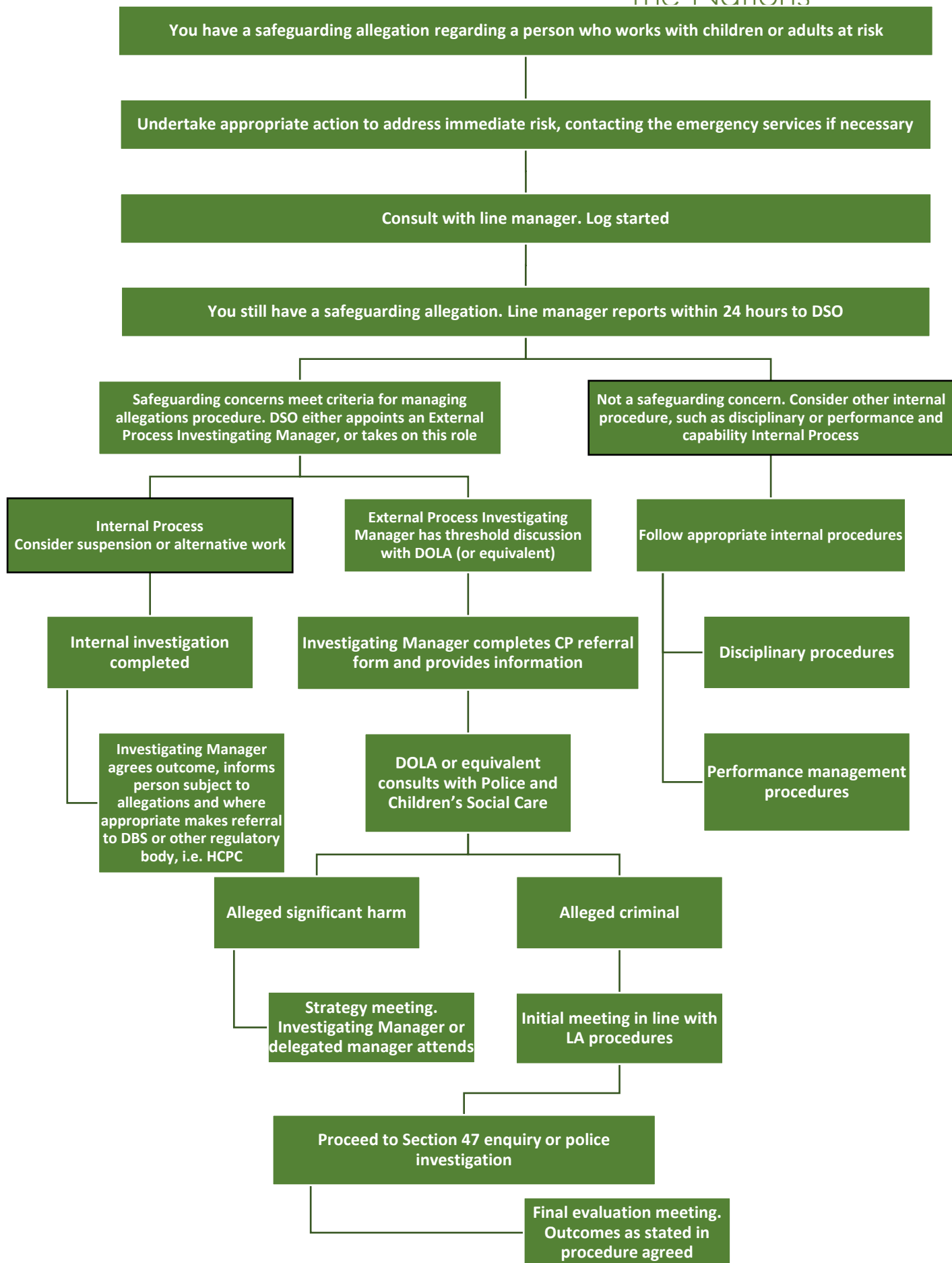
For England and Wales and

<https://www.charitycommissionni.org.uk/>

For Northern Ireland and

www.oscr.org.uk/

For Scotland



Section 5: Across the Nations Policy and Procedures for Non-Recent Abuse¹⁰

Purpose:

Across the Nations (AtN) is a Charitable Organisation that is committed to providing services to remote vulnerable populations overseas including children and families as part of its activities through our network of partners.

AtN and its partners are committed to dealing with any allegations in a manner that is both professional and expedient, seeking the best interests of the child at all times.

The purpose of this policy is to:

- To set out how the charity deals with allegations of non-recent abuse, whether against current or past AtN, or its partner, staff, and volunteers.

Scope of this document

This policy and procedure apply to all AtN and partnership project's staff and volunteers (including trustees and interns), secondees, agency staff, and students.

Guidance

In cases of concerns about any risk to children, please refer to [‘Procedures for Dealing with Disclosures and Concerns Raised About the Safety of a Child or Adult at Risk’](#) found in Section 3 of this document.

In the case of a recent allegation against an AtN, or its partners, staff member or volunteer, please refer to [‘AtN Procedure for Managing Safeguarding Allegations against Staff and Volunteers’](#) found in section 4 of this document.

Synopsis

AtN works with children through its partners in different parts of the world. All children deserve a childhood free from abuse and neglect.

There are legal requirements (2014) on statutory bodies, and statutory guidance (2014) applying to the voluntary sector across England and the devolved nations, for organisations to do everything they can both to recognise and report abuse quickly and appropriately. This is to keep children and adults' safe, and to prevent such abuse from happening in the first place.

All staff must:

- Be aware of and know what to do if they receive a referral about non-recent abuse
- Know what to do when safeguarding concerns arise
- Understand what AtN expects of them in terms of their own behaviour
- Know how to prevent harm to children
- Know how to recognise potential child abuse concerns
- Know how to recognise potential abuse of adults at risk.

¹⁰ This policy is based upon a NSPCC template. Across the Nations would like to thank the NSPCC for making these templates available to the public.

Definition

Non-recent abuse is an allegation of neglect, physical, sexual, or emotional abuse made by or on behalf of someone who is 18 years or over, relating to an incident which took place when the alleged victim was under 18 years old. Allegations can be made by:

- An adult, making an allegation of abuse when they were under 18 years of age, that occurred at least one year before it was reported
- A child¹¹ making an allegation of abuse that occurred at least one year before it was reported
- An individual who reports an allegation, on behalf of another child or adult, that occurred at least one year before it was reported

Related policies and procedures

AtN Safeguarding and Child Protection policy and 'What to do if you have a concern about a child' must be followed in conjunction with this document when dealing with any information relating to non-recent abuse. This additional policy and procedure is necessary as it predominantly focusses on disclosures of sexual abuse made by a child/adult that occurred 12 months ago or more and ensures consideration of and co-ordination where necessary, with other external inquiries.

The procedure '[AtN Managing Safeguarding Allegations Against Staff and Volunteers](#)', found in section 4 of this document, must be used in conjunction with this policy where an allegation is made against staff or volunteers currently working for the organisation. Where there are allegations of abuse concerning AtN staff or volunteers who no longer work for the organisation, these will be considered as non-recent abuse and this policy and procedure will be followed.

Why is the policy important?

In recent years, there have been increasing reports of child abuse in several institutions e.g. in BBC premises, the NHS, in children's homes, religious institutions and in schools. Allegations of sexual offending involving children have been made against people in prominent positions in public life e.g. those in the media. Those with experience in this specialist field believe there are likely to be further victims who have not felt able to come forward for the following reasons:

- Fear of reprisals
- The degree of control exercised by the abuser
- Shame or fear that the allegation may not be believed
- Unable to before but now aware that the abuser is being investigated for a similar matter

An allegation of this nature can be received by any individual working for AtN. Non-recent abuse allegations could be made against relatives, friends, carers, people in public prominence and/or a position of trust, or any other person who currently has, or previously had contact with children, young people or adults at risk. Disclosures normally, but not always, take place when the victim is no longer in circumstances where they consider themselves at risk from the perpetrator. When an allegation is received action must be taken because:

¹¹ Child: This policy is in respect of all children. A child includes babies, children, and young people from pre-birth up to 18 years. In Scotland, there is a variance to this where a child is someone up to the age of 16 unless the child is subject to a supervision requirement by a Children's Hearing, in which case they are considered a child until the age of 18 years.

- The alleged abuse may not have been an isolated incident. It might be current and be perpetrated by the same person or someone else
- It comes to light that the non-recent abuse is part of a wider setting of institutional or organised abuse
- There is a probable likelihood that a person who abused a child/ren in the past may still be doing so the perpetrator may still be working with or caring for child/ren
- Criminal prosecutions may still take place even though the allegations are historic in nature and may have taken place many years ago

How to comply (procedure)

This procedure must be followed and a referral to other agencies will be necessary in the following circumstances:

- a) allegations of child abuse involving persons in public prominence and/or people in a position of trust
- b) allegations of child abuse which took place historically where there may have been a failure within an organisation to protect children
- c) allegations of child abuse involving persons who are likely to be active and other children may be at risk

When receiving information about non-recent abuse all staff should seek to obtain where possible the following:

- Name and contact details of the person making the allegation. If a member of the public wishes to remain anonymous this should be respected, but this does not apply to professionals or staff working with the NSPCC
- Name of the individual who the allegation is about and any other identifying information, including location
- Name of any children involved
- Date and time of when the abuse occurred
- key information about the nature of the non-recent abuse allegation
- Establish, where possible, if the alleged perpetrator is still working with or caring for children
- Establish whether other agencies are involved

When Children's Services practitioners receive information regarding non-recent abuse made by a child or an adult that they are working with (an open case) they will:

- Speak to the line manager to establish if this policy and procedure (and/or any related policy and procedure) needs to be followed, and if so, follow the procedure which is to make a referral to children's social care for further action

When Children Services practitioners receive information about non-recent abuse where the child or adult is not known to them or they are not currently working with (a closed case) the following actions must take place:

- Speak to the line manager to establish if this policy and procedure (and/or any related policy and procedure) needs to be followed
- Notify the Designated Safeguarding Officer if the information received relates to a member of staff/volunteer who is currently working for the organisation or has previously done so

Designated Safeguarding Officer (DSO)

- When the DSO receives information regarding non-recent abuse cases whether open, closed or non-related (Does not involve AtN staff, volunteers, or those in partnered projects) – they will make a referral to children's social care/police or relevant body in other countries
- Consider whether the information shared meets the remit of Operation Hydrant or other enquiry into non-recent abuse
- Consider referring to the Independent Inquiry into Child Sexual Abuse if consent for this is gained from the referrer and the concerns relate to non-recent sexual abuse
- Inform the Board of Trustees with 24hrs about the allegations

When the DSO is notified about an allegation of non-recent abuse against a member of staff who has previously worked with the organisation they will undertake a review of organisational records and liaise with other parts of the organisation to gain full information in relation to the allegation.

The DSO will keep the Board of Trustees informed about the progress of the work that is undertaken.

They will establish a timescale for completing the report and will seek legal advice on the most appropriate wording to be used in the final report. The final report will include:

- AtN involvement with the person who is the subject of an allegation of non-recent abuse and critically appraise AtN practice, management, and organisational structures
- Clarity between the standards and norms of practice at the time of the allegation and those existing now
- Identification of any learning and areas for improvement in AtN practice, management, and/or processes

They will send their report to the Board of Trustees for quality assurance purposes and to deal with any concerns that arise out of their investigation.

Section 6: Across the Nations Child Protection Records Retention and Storage Guidelines

Purpose

Across the Nations (AtN) is a Charitable Organisation that is committed to providing services to remote vulnerable populations overseas including children and families as part of its activities through our network of partners.

The purpose of these guidelines is to:

- Give guidance and instructions on how to store sensitive or confidential information about children
- Help our staff stay in line with Data Protection principles.

The scope of this document

This policy applies to anyone working on behalf of Across the Nations, or its partners, including senior managers and the board of trustees, paid staff, or volunteers that store or have access to personal, sensitive, or confidential information about children or adults at risk that are involved in AtN, or its partners, activities.

Guidance

Records containing personal information should be:

- Adequate, relevant, and not excessive for the purpose(s) for which they are held
- Accurate and up to date
- Only kept for as long as is necessary (Information Commissioner's Office, 2019).

Storage of personal Information:

- Only Electronic versions of data / forms can be stored. Any paper copies must be scanned and stored electronically. The paper must then be destroyed in a way that maintains confidentiality (Shredded or incinerated)
- Any forms and related information must be labelled logically and chronologically
- Data must be stored on Across the Nations secure Microsoft 365 platform, either on SharePoint or OneDrive
- Active case files may be stored locally on OneDrive. However, within one month of a case being closed these must be securely shredded from the Hard Drive (Not just deleted using the standard Windows / Apple / Linux / Android etc. delete functions) and removed from the individual OneDrive or SharePoint account
- Copies of all cases are to be kept centrally on the AtN Microsoft 365 OneDrive or SharePoint and only the DSO is allowed access to this. In the case of the DSO being unable to access this (either while on holiday or through illness) the Chairman of the Board of Trustees may have temporary access if needed

- Access to these central files must be protected by individual access agreement, through usernames and passwords according to the Microsoft 365 protocols
- Access to data is on a 'need to know' basis
- A log must be kept of who has accessed confidential files, when, and the titles of the files they have used
- Information about child protection concerns and referrals should be kept in a separate child protection file for each child, rather than in one 'concern log'. The child protection file should be started as soon as you become aware of any concerns
- If records need to be shared (within AtN or externally), make sure that they are kept confidential. Consider using passwords and/or encryption when sharing electronic files, especially if it is going outside of the AtN Microsoft 365 environment
- AtN staff and volunteers, or partners with access to AtN files, may use their personal computers to make and store records locally. However, the computer or other electronic device (Phone / tablet etc.) must be password protected at bootup / login, and all files used remain within the Microsoft 365 Office and OneDrive or SharePoint environment
- Personal and AtN computers and other electronic storing devices that access, and store child protection issues must have adequate protection against hackers and viruses
- If the person responsible for managing child protection records leaves AtN, somebody must be appointed at the Board of Trustees level to take over their role (Even for a caretaker period) and arrange a proper handover of information

Retention periods: child protection records:

(Please note some agencies have their own guidance for retention of child protection information, the DSO will have to use their discretion how to bridge any discrepancies with any AtN policies and record this as accurately as possible)

- If the child is in the UK, child protection files should be passed on to any new school a child attends (Information and Records Management Society (IRMS), 2016; Department of Education, 2016; Department for Education (DfE), 2018)
- If the child is from another nation – local regulations should be followed
- The file should be kept until the child is 25 (this is seven years after they reach the school leaving age) (Information and Records Management Society (IRMS), 2016). In Northern Ireland the government recommends that child protection files should be kept until the child's 30th birthday (Department of Education, 2016)
- In some cases, records should be kept for longer periods – see the 'Exceptions' section below for more information.

Recording concerns about adult behaviour

Keeping these records will enable us to give accurate information if we are ever asked for it. For example:

- In response to future requests for a reference
- If a future employer asks for clarification about information disclosed as part of a vetting and barring check
- If allegations resurface after a period of time.

Sometimes concerns might be raised about an adult who works or volunteers with children. This could be because they've:

- Behaved in a way that has harmed, or may have harmed, a child
- Committed a criminal offence against, or related to, a child
- Behaved in a way that indicated they are unsuitable to work with young people

If any concerns are raised about AtN staff or volunteers, please refer to [‘Across the Nations Procedure for Managing Safeguarding Allegations against Staff and Volunteers’](#) found in Section 4 of this document to help guide you how to do this according to AtN policies and procedures.

Storing records relating to adults

Records relating to concerns about an adult’s behaviour should be kept in the person’s confidential personnel file (not in a central ‘concerns log’) and a copy should be given to the individual.

Retention periods: concerns about adults

If concerns have been raised about an adult’s behaviour around children, records should be kept in their personnel file either until they reach the age of 65 or for 10 years – whichever is longer (IRMS, 2016; Department for Education, 2018). This applies to volunteers and paid staff.

For example:

- If someone is 60 when the investigation into the allegation is concluded, keep the records until their 70th birthday
- If someone is 30 when the investigation into the allegation is concluded, keep the records until they are aged 65

Records are to be kept for the same amount of time regardless of whether the allegations were unfounded. However, if you find that allegations are malicious you should destroy the record immediately.

Information should be kept for this length of time even if the person stops working or volunteering for AtN or its partners. In some cases, records should be kept for longer periods, see exceptions below.

Exceptions

In some cases, records can be kept for longer periods of time. For example, if:

- The records provide information about a child’s personal history, which they might want to access at a later date
- The records have been maintained for the purposes of research
- The information in the records is relevant to legal action that has been started but not finished
- The records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation).

Where there are legal proceedings legal advice should be sought about how long to retain records.

Some records are subject to statutory requirements and have a specific retention period. This includes records relating to:

- Children who have been ‘looked after’ by the local authority
- Adopted children

- Registered foster carers
- Residential children's homes.

Any stipulations made by an insurance company, regulating body or local safeguarding agencies should be taken into account when making decisions about retention periods.

When records are being kept for longer than the recommended period, files must be clearly marked with the reasons for the extension period.

In the case of any records that could be needed by an official inquiry (for example the Independent Inquiry into Child Sexual Abuse (IICSA) (IICSA, 2018)), Inquiries will issue directions for records to be retained and these must be followed.

Criminal records checks

Copies of criminal records should not be stored. Certificates should be checked and returned unless there is a dispute about the results of the check. Instead, a confidential record should be kept of:

- The date the check was completed
- The level and type of check (standard/enhanced/barred list check and the relevant workforce)
- The reference number of the certificate
- The decision made about whether the person was employed (with reasons).

If there is a dispute about the results of a check, a copy of the certificate can be kept for no longer than six months.

Destruction of child protection records

When the retention period is finished, confidential records should be incinerated or shredded in the presence of the DSO or entrusted to a firm specialising in the destruction of confidential material. At the same time, any electronic versions of the record must be effectively shredded, not deleted according to standard protocols of operating systems like Windows / Apple / Linux / Android etc. If not shredded immediately, all confidential records must be held in a secured plastic bag, labelled as confidential and locked in a cupboard or other secure place; or placed in a confidential waste bin.

If Across the Nations or a project is closed, appropriate arrangements must be made for the ongoing management of records. This includes the review, retention, and disposal of records.

Reviewing child protection records retention and storage policy

A review of the child protection records retention and storage policy should be held annually to make sure it is effective and continues to comply with current legislation and guidance. This should be carried out as part of a wider review of safeguarding policies and procedures.

Changes to the child protection records retention and storage policy

A copy of the original, and each subsequent version, is to be kept. New versions must have a clear log of changes including a record of what changes have been made and why. A logical and chronological version number must be used for each new version. The original version starts with version 1.0

Contact details

Designated Safeguarding Officer

Name:

Phone/email:

This policy statement came into force on(date)

We are committed to reviewing our policy and good practice annually.

This policy statement and accompanying procedures were last reviewed on
(date)

Signed:

Date:

Next review date:

Appendix A: Overview of all Across the Nations Policies and Procedures

01 Across the Nations Safeguarding Policy (*This document*)

02 Across the Nations Digital Safety Policy

03 Across the Nations Security Health and Safety Policy Statement

04 Across the Nations Policy and Procedures for Safe Recruitment

05 Across the Nations Whistleblowing Policy

06 Across the Nations Anti Bullying Policies

All of these policies are available on our website:

www.acrossthenations.org.uk/policiesandprocedures

These policies are available to all AtN, and partner project's, staff, and volunteers. They are also available to the general public upon request at all of our projects, and can also be requested by emailing: safeguarding@acrossthenations.org.uk

1. Definition of Child:

A 'Child' is any person below the age of 18, regardless of national laws or cultural practices which may stipulate a younger age.

2. Definition of Adult 'At Risk'¹²

An 'Adult at Risk' is any person aged 18 and over (regardless of national laws or cultural practices which may stipulate otherwise):

- who has specific care, support, welfare or special needs and is dependent or reliant on others to meet those needs?
- who is made vulnerable due to circumstances beyond their control and is dependent or reliant on others for the provision of basic necessities such as safety, shelter, water, food, health care and transportation etc,
- who is vulnerable as a result of trafficking and other forms of exploitation by someone in a position of power or authority?
- who is in an unfamiliar country or location?

Whom AtN considers vulnerable as a result of their circumstances including adults:

- in a refugee camp or a recipient of as part of an NGO relief distribution, and are potentially vulnerable to exploitation or abuse as a result of their status or their lack of power and control; and/or
- in an unfamiliar country and location
- in a relationship (work or social) or in contact with another adult who seeks to misuse their position of authority/power/seniority or trust to control, coerce, manipulate or dominate them.

3. In addition to the standard categories of abuse as outlined above it is important to be aware of the risks to children and young people associated with:

- Criminal exploitation
- Modern day slavery
- Commercial exploitation
- Extremism and radicalisation
- Forced marriage
- Human trafficking
- Female genital mutilation FGM

¹² Adapted from Tear Fund's Safeguarding Definitions -

https://www.tearfund.org/en/admin/safeguarding_declaration/?d=1%3Fd%3D1%3FJobID%3D%7B3937A32E-47A8-4B91-9614-8DFDC06891B6%7D%3FJobID%3D%7B1E235BA0-CB3B-458F-B6D3-68CB2FFE28B6%7D

Purpose

Across the Nations (AtN) is a Charitable Organisation that is committed to providing services to remote vulnerable populations overseas including children and families as part of its activities through our network of partners.

The purpose of this form is to:

- Accurately record any concerns about children's safety
- Accurately record and allegations against an adult, including an AtN, or its partners, trustee, staff member or volunteer.

Scope of this document

This form is to be used in the case of concern about the a child's safety, or an allegation against an adult, including anyone working on behalf of Across the Nations, or its partners, including senior managers and the board of trustees, paid staff or volunteers.

Guidance:

- Concerns about children's safety and wellbeing:
 - If anyone has concerns about a child or young person's welfare or safety, it is vital that all relevant details are recorded.
 - This must be done regardless of whether the concerns are shared with the police or children's social care.
 - Please refer to '*03 AtN Procedure for Reporting Suspected Child Abuse Cases*' to guide you through the process.
- Recording concerns about adult behaviour:
 - If anyone has concerns about the behaviour of an AtN, or partner project, staff member or volunteer - it is vital that all relevant details are recorded.
 - This must be done regardless of whether the concerns are shared with the police or children's social care.
 - Please refer to '*04 AtN Procedure for Managing Safeguarding Allegations against Staff and Volunteers*' to guide you through the process.
- You may need to initially write down what has happened and then complete the more formal form and add the other details as soon as is reasonably possible.
- Using the form provided beneath, keep an accurate record of the incident. Make sure the report is factual. Any interpretation or inference drawn from what was observed, said, or alleged should be clearly recorded as such. The record should always be signed and dated by the person making the report.

¹³ This form is modified from a NSPCC Template. AtN is very grateful to the NSPCC for allowing public access to these templates

Your name:	Name of organisation:
Your role:	
Your Contact information <i>Telephone number:</i> <i>Address:</i> <i>Email address:</i> <i>Postcode:</i>	
Child's name:	Child's date of birth:
Child's ethnic origin: <i>Please state</i>	Does child have a disability? <i>Please state</i>
Child's gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Unspecified	
Parent's / carer's name(s): <i>Address:</i> <i>Telephone number:</i> <i>Postcode:</i> <i>Email address:</i>	
Have parent's / carer's been notified of this incident? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If YES, please provide details of what was said/action agreed:	
Are you reporting your own concerns or responding to concerns raised by someone else? <input type="checkbox"/> Responding to my own concerns <input type="checkbox"/> Responding to concerns raised by someone else	
If responding to concerns raised by someone else: <i>Please provide further information in box below</i>	
Name: Position within the organisation or relationship to the child: Telephone numbers: <i>Email address:</i>	
Date and times of incident:	
Details of the incident or concerns: <i>Include other relevant information below, such as description of any injuries and whether you are recording this incident as fact, opinion, or hearsay.</i>	

ACROSS

The Nations

Child's account of the incident:

Please provide any witness accounts of the incident:

Please provide details of any witnesses to the incident:

Name:

Position within the organisation or relationship to the child:

Date of birth (if child):

Telephone number:

Address:

Email address:

Postcode:

Please provide details of any person involved in this incident or alleged to have caused the incident / injury:

Name:

Position within the organisation or relationship to the child:

Date of birth (if child):

Telephone number:

Address:

Email address:

Postcode:

Please provide details of action taken to date:

Has the incident been reported to any external agencies?

☐ Yes ☐ No

If YES, please provide further details: *Please provide further information in box below*

Name of organisation / agency:

Contact person:

Telephone numbers:

Email address:

Agreed action or advice given:

Your Signature:

Print name:

Date:

What do I do next?

- **Contact the AtN DSO in line with AtN reporting procedures**
- **Store this record in a designated safe place**
- **Scan and send to the AtN DSO and note the timeframe for this**

ACROSS

The Nations

- *Once acknowledgement has been received the paper copy should be destroyed in line with current policy.*

Upholding this code of conduct

You should always follow this code of conduct and never rely on your reputation or that of our organisation to protect you.

If you have behaved inappropriately you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you may be asked to leave Across the Nations. We may also make a report to statutory agencies such as the police and/or the local authority child protection services.

If you become aware of any breaches of this code, you must report them to the AtN DSO. If necessary, you should follow our whistleblowing procedure and safeguarding and child protection procedures.

Signatures:

I confirm that I have read, understood, and agreed to follow the code of behaviour, and I understand the consequences of inappropriate behaviour.

Employee or Volunteer's Name:

Signature:

Manager's Name:

Signature:

Project Name &
Location:

Date:

This form is to be kept in each person's confidential HR file. A scanned copy of this last page is to be sent to the AtN DSO for their records.

Project:

Latest Update:

Compulsory Training

[illegible]

Extra Training

[illegible]

The report log will enable the AtN DSO to:

- Track investigations to ensure they are timely
- Learn from outcomes
- Collate information for statistical returns and annual reporting.

The Senior Manager responsible for managing the safeguarding allegation must update this log at the start of the process, every four weeks thereafter and at the conclusion of the investigation process. On each occasion it should be submitted to those listed below:

Name	Position

Informant and person subject of the safeguarding allegation

Name of Subject of Allegation	
Employee or volunteer	
Job title/project service/ country/ region	
Department/service/location	
Region/nation/national services	
Informant's details	
Manager receiving allegation	
Date and time allegation received	

Key contacts

Name and contact details

First line manager	
Second line manager	
Safeguarding lead	
HR consultant	
Director or regional/national Head of Service	
Any other relevant person - specify	

Details of allegation

Alleged victim details if known (name/ DOB/age/ gender/ethnicity/country of birth/specific needs etc)

ACROSS

The Nations

Detailed description of safeguarding allegation

Action and key decisions taken to date (e.g. details of any investigations, suspensions etc) A separate running record and details of interviews and discussions should be maintained and available when necessary

Notifications to external bodies (referral to police or notification to professional regulatory body)

Any required actions and by who:

Outcome of management of allegation process

Form Completed by:

Signed:

Date:

Named Senior Officer:

Form Reviewed by:

Date of next review log:

Signed:

ACROSS

Date:

The Nations

Signed:

Date: