

Safeguarding and child protection policy

Scope

This policy is mandatory for all employees of the Chartered Insurance Institute ("CII). For the purposes of this policy, 'employee' is defined as anyone who works for the CII. The policy also covers other associated parties that represent the CII such as, trustees, contractors, employees and volunteers of sub-contractors, agency workers, consultants, volunteers, interns and all visitors to CII work programmes and offices.

The CII believes that all young people without exception, have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs. In this policy child refers to those aged 18 and under.

This policy demonstrates how the CII will meet its legal obligations and reassure volunteers, employees, partners and members of the public:

- a) On what they can expect the CII to do to protect and safeguard vulnerable people.
- b) That they are able to safely voice any concerns through an established procedure.
- c) That all reports of abuse or potential abuse are dealt with in a serious and effective manner.
- d) That there is an efficient recording and monitoring system in place.
- e) That a robust 'safe' recruitment procedure is in place.

Policy Statement

The CII abides by the duty of care to safeguard and promote the welfare of children and young people and is committed to safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements.

- We recognise the welfare of children is paramount
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation has an equal right to protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

Safeguarding is the responsibility that an organisation has to ensure that their employees and volunteers, partners, vendors, operations and programmes do no harm to children, young people or vulnerable adults; that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organisation has about the safety of vulnerable people within the communities in which they work, are dealt with and reported to the appropriate authorities.

Child protection is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse.

Over recent years, there has been increasing recognition of the way in which children, young people and vulnerable adults can be at risk of discrimination, neglect, abuse and exploitation by those who are in positions of trust and power over them.

Child Safeguarding Policy

Through their work, CII employees, employees of partner organisations and volunteers may engage with young people and vulnerable adults either directly or indirectly. As a result, the CII recognises it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people and vulnerable adults who come into contact with its services.

Purpose

This policy is intended to protect children and young people who receive any service from us, from any harm that may be caused due to their coming into contact with the CII. This includes harm arising from:

- The conduct of staff or personnel associated with the CII
- The design and implementation of the CII's programmes and activities

This policy is intended to provide guidance and overarching principles to those who represent us as volunteers or staff, to guide our approach to child protection and safeguarding.

Any breach of this policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, withdrawal of volunteer status, and reporting to the police, relevant regulatory authority or other body.

This policy does not cover;

- Sexual harassment in the workplace – this is dealt with under the CII's Harassment and Bullying Policy.
- Safeguarding concerns in the wider community not perpetrated by the CII or associated personnel.

What is safeguarding?

In the UK, safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect

For the purpose of this policy, safeguarding is the protecting of people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programs.

Legal Framework

This policy has been drawn up in accordance with all relevant and applicable legislation and guidance available to the Company in the jurisdictions it operates within in the United Kingdom. Chiefly, this policy operates in accordance with the:

- Children Act 1989
- United Nations Convention on the Rights of the Child
- The Safeguarding Vulnerable Adults Act 2006
- Children Act 2004
- General Data Protection Regulation
- Data Protection Act 2018

The CII will work to the following key principles to protect children and at-risk adults;

Child Safeguarding Policy

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with the CII. This includes the way in which information about individuals in our programmes is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff and associated personnel
- **Ensure staff receive training on safeguarding at a level commensurate with their role**
- Follow up on reports of safeguarding concerns promptly and according to due process
- When working with or through partners or subcontracted agencies, the CII will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- The CII respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a *need to know basis*, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- The CII commits to monitoring the implementation of the safeguarding policy. This policy will be reviewed **every three years and earlier if necessary.**
- Equality, Diversity and Inclusion; the CII seeks always to work in ways which are inclusive and that respect the diverse nature of the people we work with. We recognise that there are many different ways of thinking and taking care of vulnerable people and we are committed to ensuring that we accord equal rights to protection for children from abuse. Every child matters everywhere in the world and Culture must not be used as an excuse to abuse children, young people or vulnerable adults.

All employees working with the CII will:

- Read, understand and adhere to the CII Safeguarding policy and CII Code of Conduct Policy
- Strive to promote a zero tolerance approach to discrimination, sexual harassment and abuse in all working environments
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty
- Place the safety and welfare of children and vulnerable people above all other considerations
- Report any concerns they may have about the welfare of a child or vulnerable person (eg radicalisation).
- Report any concerns they may have about the behaviour of a CII employee or representative in relation to safeguarding
- In a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why. If possible ensure another adult is in sight and that the child or young person knows another adult is around.
- Define clearly whether products, services and activities they are creating or delivering are appropriate or intended for children, and ensure that the safety and welfare of children is a critical design element where they are
- Notify the safeguarding lead and work with them to risk assess a situation where an employee will be working with a child or where the child is engaging with CII services that have been designed for adults.

All people working with the CII will not:

- Sexually harass, assault or abuse another person
- Physically harass, assault or abuse another person
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe
- Develop, encourage or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive
- Act in ways that may be violent, inappropriate or sexually provocative
- Agree with a child to keep a secret which has implications for their safety or the safety of other young people.

Raising and responding to concerns

The CII places a ***mandatory obligation*** on all employees, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation of children and at-risk adults, or which suggests this policy may have in any other way been breached.

Employees who have a complaint or concern relating to safeguarding should report it immediately to the designated Safeguarding officer or line manager. If the employee does not feel comfortable reporting to the designated safeguarding officer, they may report to any other appropriate member of staff. This could be a member of the ELT, SLT or HR team.

Responding to safeguarding concerns

The CII will follow up on all safeguarding reports and concerns according to policy, and legal and statutory obligations. The CII will apply appropriate disciplinary measures to employees found in breach of policy.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection.

However, information should be shared with the Local Authority if a child is deemed to be at risk of harm or **contact the police if they are in immediate danger, or a crime has been committed.**

Recording and Record Keeping

A written record must be kept about any concern regarding safeguarding. This must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made.

Child Safeguarding Policy

All records must be signed and dated. All records must be securely and confidentially stored in line with General Data Protection Regulations (GDPR).

Training and Awareness

The CII will ensure an appropriate level of safeguarding training is available to its Trustees, Employees, Volunteers and any relevant persons linked to the organisation who requires it.

For all employees who are working or volunteering with children, this requires them as a minimum to have awareness training that enables them to:

- Understand what safeguarding is and their role in safeguarding children.
- Recognise a child potentially in need of safeguarding and act.
- Understand how to report a safeguarding Alert.
- Understand dignity and respect when working with children.
- Have knowledge of the Safeguarding Children Policy.

All employees who will be working in a direct capacity with children will be subject to an Enhanced DBS check.

Supporting policies

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:

- CII Code of Ethics
- Complaints Policy
- Data Protection and Privacy Statement
- Disciplinary Policy
- Electronic Information & Communication Systems
- Equal Opportunities and Diversity
- Grievance policy (Complaints)
- Harassment and Bullying policy
- Social media policy
- Whistleblowing policy
- Procedures for reporting and response to safeguarding concerns (DRAFT THIS)

Safeguarding Key Contacts (See appendix)

Senior Lead for Safeguarding

Name: George Tsounias

Email address: George.tsounias@cii.co.uk

Telephone number: +44 (0)20 8989 8464

Deputy Senior Lead for Safeguarding

Name: Nicola Mellor

Email address nicola.mellor@cii.co.uk

Telephone number +44 (0)20 8989 8464

Child Safeguarding Policy

Trustee for Safeguarding

Name: Caren Thomas

Email address: caren.thomas@cii.co.uk

Telephone number: +44 (0)20 8989 8464

Appendix 1

ABOUT THE DESIGNATED SAFEGUARDING LEAD ROLE¹

What does the role include?

As the designated safeguarding lead (DSL) you act as the main source of support, advice and expertise for safeguarding in your organisation. The details of how you carry out your role will have some differences when your organisation primarily works with adults at risk or children, but the overall responsibilities will be the same.

- Advise and support the senior team in developing and establishing your organisation's approach to safeguarding.
- Play a lead role in maintaining and reviewing your organisation's plan for safeguarding.
- Coordinate the distribution of policies, procedures and safeguarding resources throughout your organisation.
- Advise on training needs and development, providing training where appropriate.
- Provide safeguarding advice and support to staff and volunteers.
- Manage safeguarding concerns, allegations or incidents reported to your organisation.
- Manage referrals to key safeguarding agencies (eg social services or police) of any incidents or allegations of abuse and harm.

Who can be a designated safeguarding lead?

- Someone with resources and capacity to act
- Not the most senior person in the organisation
- One person with overall responsibility
- Available when the organisation is active

In some organisations the DSL will be a member of the senior management team, reporting directly to the chief executive. They must have the resources and capacity to act and to influence others.

Skills and abilities needed for the role

You don't always need to have previous experience or qualifications in safeguarding. Knowledge of safeguarding guidance and procedures is helpful, but you can learn this through training. You do need to be confident to lead and influence others and be prepared to deal with difficult situations and people. You also need to be organised and able to create clear systems and processes, as managing safeguarding concerns and tracking actions is the main part of your role.

¹ <https://knowhow.ncvo.org.uk/safeguarding/checklists-training-and-other-support/specialist-guides/a-designated-safeguarding-leads-handbook>

Training and development

There is specific training available for designated safeguarding leads. This training can provide you with new knowledge and skills and the opportunity to network with others in a similar role to you. You should update your training every two years.

You might also want to consider if there are any training areas which might help you understand specific safeguarding issues. This will depend on the risks your organisation may encounter.

Appendix 2: Definitions of abuse

2. What is child abuse?

2.1 **Definitions of abuse (England and Wales)**

The definitions of child abuse recommended as criteria throughout England and Wales by the department of Health, department for Education and Employment and the Home Office in their joint document, Working Together to Safeguard Children (1999) are as follows:

Abuse and neglect

A form of maltreatment of a child. Somebody may abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or young person

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing deliberate harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child/young person they are looking after. This situation is currently referred to as "fabricated or induced illness".

Emotional abuse

Emotional abuse is the persistent emotional ill-treatment of a child/young person such as to cause severe and persistent adverse effects on the child/young person's emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on young people. It may involve causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of ill-treatment of a child/young person, though it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child/young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people/peers.

Neglect

Neglect is the persistent failure to meet a child/young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child/young person's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Organised abuse

Organised or multiple abuse may be defined as abuse involving one or more abuser and a number of related or non-related abused children and young people. The abusers concerned may be acting in concert to abuse young people, sometimes acting in isolation, or may be using an institutional framework or position of authority to recruit young people for abuse. Organised and multiple abuse occur both as part of a network of abuse across a family or community, and within institutions such as residential homes or schools.

(A child/young person may suffer more than one category of abuse).

2.2 Who abuses children?

Abusers are:

- Rarely 'strangers'
- Usually someone who knows the child, e.g. parent, babysitter, sibling, relative, friend of the family or peer
- Sometimes someone in authority such as teacher, youth worker, young people's worker or church worker/leader
- Sometimes someone who seeks to join and help in organisations working with young people to obtain access to them

Appendix 3

Safeguarding Concern Form

This form is designed to internally record a safeguarding concern.

Please complete the form and send electronically to the Lead Safeguarding Officer.

Date	
------	--

Name of young person/vulnerable adult			
Name		Date of Birth	
School or Organisation		Age	
		Gender	
		Borough	

Your Details			
Name		Job Title	

Child Safeguarding Policy

Phone number			
Email			

Have you clearly explained Confidentiality Policy to Child/Vulnerable Adult: **YES/NO**

(please circle)

Type of Safeguarding Concern (please tick or highlight)			
Neglect	Emotional	Physical	Sexual
Self Harm	Suicidal Ideation	Suicide Attempt	Domestic Abuse
Sexual Exploitation	Sexual Assault	Financial	Hate Crime
Risk to Others	Radicalisation	FGM	Abuse by Professional
Other:			

Who have you spoken to about your concerns?	Name	Contact details
Parent/Carer		
Line Manager		
Supervisor		
Youth Organisation		
School/Academy		
Other		

Summary of your concerns

Child Safeguarding Policy

--

Any actions agreed?

--

Child Safeguarding Policy

Signature:

--	--