

PROJECT 21

ACTIVITIES | CLUBS | EVENTS
FOR PEOPLE WITH DOWN'S SYNDROME

Policy Document Number 15

Policy Owner : CEO

Policy Appeal to: Trustees

Date: October 2025

Review date: October 2026

Signed:

Lead for Safeguarding:

Date:

Deputy for Safeguarding:

Date:

Trustee for Safeguarding:

Date:

Annual Review date: October 2026

Links to other Policies/Procedures:

The purpose of the safeguarding policy is to provide a secure framework for all staff, volunteers and Trustees of Project 21 in safeguarding and to promote the welfare of members who attend events. The policy is for all staff, parents, Trustees, volunteers and contractors. It forms part the safeguarding arrangements for Project 21.

The Trustees expect that all staff will have read and understood this policy and their responsibility to implement it, before signing it.

Aims

The policy aims to ensure that:

- All members are safe and protected from harm
- Provision and policies are in place to enable our members to feel safe and adopt safe practices
- Staff, members, Trustees, visitors, volunteers as well as parents/carers/guardians are aware of the expected standards of behaviour and Project 21's responsibilities in relation to safeguarding.

Equal Opportunities Statement

We recognise that anyone can become subject to discrimination, harassment or victimisation because of:

- age
- culture
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation
- colour, appearance or gender

Comments and actions that contribute to discrimination, harassment or victimisation are not acceptable and will be challenged. Such incidents will be recorded and shared with parents and carers, and the relevant agencies when necessary and appropriate.

We will:

- treat everyone with respect and celebrate their achievements,
- carefully recruit and select all staff whether paid or unpaid,
- respond to concerns and allegations appropriately.

When there are concerns about the welfare of any, child, young person or adult at risk, all responsible adults in our organisation are expected to share those concerns, without delay, with the Lead for Safeguarding (or the Deputy, if the Lead is unavailable).

Our policy is approved by Trustees and will be reviewed and updated annually. We will publish and promote this policy to all staff, paid or unpaid, through induction, training and supervision. We endeavour to disseminate, as appropriate, this policy to all who come into contact with Project 21 e.g. vulnerable at risk children, young people and adults, their parents, carers, families and others, such as organisational partners and fundraisers.

Ethos

We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of members. We aim to provide a safe and welcoming environment, underpinned by a culture of openness where all can feel secure, are able to raise concerns and believe they are being listened to, and that appropriate action will be taken to keep them safe.

Safeguarding at Project 21 is considered to be the responsibility of everyone and as such, our aim is to create the safest environment within which every member has the opportunity to achieve their goals.

Project 21 recognises the contributions it can make in ensuring that all members, or those who use our activities/facilities, feel that their voices will be heard, and that appropriate action will be taken in relation to any concerns which have been raised. Members at our activities must be able to talk freely to any member of staff or volunteer if they are worried or concerned about something.

We will not make promises to any member relating to any safeguarding disclosures. We will endeavour to work in partnership with other agencies and seek to establish effective working relationships with parents and carers.

Key roles and responsibilities

Project 21 has a Board of Trustees who have a strategic leadership responsibility for the safeguarding arrangements and must ensure that they comply with their duties under legislation. This includes having an effective safeguarding policy with appropriate procedures in place.

- The Trustees have a legal responsibility to make sure that there are appropriate policies and procedures in place, which have regard to statutory guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote members welfare.
- The Trustees will also ensure that the Project Manager makes the policy available by publishing this on the Project 21 website or in writing if requested.
- The Trustees will ensure the Project Manager facilitates a whole organisational approach to safeguarding. This means involving everyone and ensuring safeguarding is at the forefront and underpins all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear and easy to understand and operate with the best interests of the members.
- The Trustees will ensure that the Project Manager has systems in place that are well promoted, easily understood and easily accessible for confidentially reporting any form of abuse, knowing concerns will be treated seriously, and knowing views can be expressed and feedback given.
- The Trustees will ensure that Project 21, through the leadership of the Project Manger contributes to multi-agency working.
- The Trustees will ensure that, as a minimum, the following policies are in place to enable appropriate action to be taken to safeguard and promote the welfare of members and staff as appropriate:
 - online safety
 - safer recruitment
- It is the responsibility of the Trustees to ensure, through the Project Manager's leadership, that staff and volunteers are properly vetted to make sure they are safe to work with the members who attend Project 21 and that the procedures for appropriately managing safeguarding allegations made against, or low level concerns involving, members of staff are in place.
- The Trustees will ensure that there is a named Trustee for safeguarding, a Designated Safeguarding Lead (DSL) who is a senior member of the leadership team and has lead responsibility for safeguarding and will ensure that they have the appropriate training.

- The Trustees will have regard to their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).
- The Trustees will ensure that the Project Manager informs Suffolk County Council and the Statutory Sick Pay (SSP) annually about the discharge of their safeguarding duties by completing the safeguarding self-assessment audit.

Designated Safeguarding Lead (DSL)

The DSL will take lead responsibility for safeguarding (including online safety including understanding the filtering and monitoring systems in place). This is made explicit in the roleholder's job description.

The DSL will have the appropriate status, authority, time, funding, training, resources and support they need to carry out the duties of the post effectively.

The DSL and any alternate DSLs will provide advice and support to staff will liaise with the local authority and work with other agencies. The DSL and/or the Deputy DSL should always be available during activity hours for staff, to discuss any safeguarding concerns. The DSL will make arrangements for adequate and appropriate cover arrangements for any out of hours activities.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role. This training will be updated every two years. The DSL will liaise with the Safeguarding Trustee to inform them of issues and in particular ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

Project 21 Designated Safeguarding Lead : Miss Alex Munn

Job role: CEO

Contact details: alex@project21uk.com

Deputy Safeguarding Lead

The Deputy for Safeguarding should be available to support or cover for the Lead. They will also handle any complaints or allegations against the Lead for Safeguarding if appropriate. It is important that the Lead and Deputy for Safeguarding are unconnected.

Deputy Lead for Safeguarding: Jess Foulger

Job role: Project Manager

Contact details: jessica@project21uk.com

The Safeguarding Trustee is unconnected to the Lead for Safeguarding and Deputy for Safeguarding. They receive up to date and relevant training with the ability to develop knowledge, skills and expertise in safeguarding.

Project 21 names Safeguarding Trustee: Mrs Angela Evans Contact details: Safeguardingtrustee@project21uk.com

Local Authority Designated Officers (LADO)

In addition, the Local Authority's Corporate Director for Children and Adults in Suffolk, has identified dedicated staff to undertake the role of the LADO to report allegations against all staff and volunteers.

LADOs can be contacted:

Email: LASOCentral@suffolk.gcsx.gov.uk

Telephone number: 03001232044

Project Manager

The Project Manager will ensure that the policies and procedures adopted by the Board of Trustees are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole organisation approach to safeguarding. The Project Manager will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

All

All Trustees/staff have a responsibility to provide a safe environment at Project 21 by ensuring they are familiar with the systems in place which support safeguarding, including the safeguarding policy, the code of conduct/staff behaviour policy and the role of the DSL (including the identity of the DSL and any deputies). These will be explained to all staff on induction.

All Trustees/staff should be aware of indicators of abuse and neglect so that they are able to identify cases of members who may be in need of help or protection.

All Trustees/staff should maintain a belief that 'it could happen here' where safeguarding is concerned and if staff have any concerns about an individual's welfare, they must act on them immediately.

All Trustees/staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All Trustees/staff should know what to do if a member tells them they are being abused, neglected or exploited, and/or is otherwise at risk of involvement in criminal activity.

All Trustees/staff should be aware of the process for making referrals.

Where a disclosure is made to a visiting staff member from a different agency e.g. freelancer, it is the responsibility of that person to formally report the referral to the DSL at the event/activity site, in the first instance. Any records made should be kept securely at the Charity's registered address. A referral should not be delayed by endeavouring to have a prior discussion with the DSL, it is felt/identified that a member is at immediate risk and the DSL is unavailable. If concerns for a member immediate welfare remain, they should be referred to social care via:

Customer First using the number 0808 800 4005 or call 999.

All staff should be aware of and understand their role within the early help process for all services, at both a Local Authority and school or college level. This includes providing support as soon as a problem emerges, liaising with the DSL, and sharing information with other professionals in order to support early identification and assessment, focussing on providing interventions to avoid escalation.

Knowing what to look out for is vital to the early identification of abuse and neglect and specific safeguarding issues such as criminal exploitation and sexual exploitation. If staff are unsure, they should always speak to the DSL (or deputy). If, in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the leadership team.

Safer Recruitment and selection

All staff and volunteers who are recruited will undertake a formal selection process, references obtained, and their validity established. Other vetting processes will include CRB checks to ensure applicants are safe to work with Project 21 members as well as other parties they will come across.

Our organisation is committed to safe recruitment in line with the relevant legislation for recruiting all staff, paid or unpaid. We do this by:

- advertising vacancies with a clear commitment required to safeguarding
- assigning all posts detailed job descriptions
- obtaining full personal details via an application form (not CVs) with particular relevance to previous work with children, young people and adults at risk
- when a candidate is selected for interview the relevant criminal declaration form (Disclosure and Barring Service (DBS)) will be sent for completion as set out by the Rehabilitation of Offenders Act 1974, as amended
- always taking up a minimum of two written references, one from the most recent employer or education establishment or personal reference.
- undertaking all interviews face to face, based on the job description
- ensuring at least one person on each interview panel will have undertaken Safer Recruitment training safe recruitment guidelines.
- having sound procedures and recording for interviewing to ensure we are satisfied, and can evidence that the applicant is appropriate and suitable

Any appointment will only be confirmed subject to:

- a satisfactory ID and criminal records check at the appropriate level, including [Certificates of Good Conduct](#) for foreign nationals and the [International Child Protection Certificate \(ICPC\)](#) for anyone who works with children and has lived in the UK and also travelled overseas
- a follow up of written references by telephone if relevant to the vacant post
- a check of essential qualifications and any specific professional details
- confirmation of the [Right to Work in the UK](#) for employed personnel
- fitness to work as relevant

Induction & Training

The Trustees will have access to safeguarding training and ensure that all staff receive appropriate safeguarding training (including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring) which is regularly updated and in line with advice. In addition, all staff members will receive regular safeguarding updates (for example, via email, e-bulletins, staff meetings) as required, but at least

annually, to provide them with relevant skills and up to date knowledge of emerging and evolving safeguarding issues to safeguard effectively.

The DSL will have enhanced safeguarding training.

All new staff members will undergo safeguarding training at induction. This will include training on the safeguarding policy, online safety, the code of conduct/staff behaviour policy, low level concerns guidance and the role of the designated safeguarding lead.

The Trustees will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the safeguarding approach and wider staff training.

The Project Manager will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

We have a clear induction and training strategy with clear job descriptions, responsibilities and all relevant procedures. All new staff, paid and unpaid, will receive induction training as soon as possible and sign to record they have:

- received and understood this policy.
- been given any relevant resources
- understood the commitment to safeguarding training

When needed, staff will receive further safeguarding training, at the appropriate level, as soon as possible. We also agree a probationary period of 3 months with clear goals and then provide appraisals at regular intervals of 3 months. Updated safeguarding training is normally required every 2 years (online) or three years (face to face).

Consent

When consent is required for any care, activity or intervention we will, unless it is an emergency, obtain consent from the /parent/carer or member if of sufficient age and understanding.

Where relevant, we will ensure we fulfil our obligations under Child Care Law in terms of parental responsibility and Mental Capacity Legislation on supporting, where possible, the individual's right to make their own decisions. Any decisions made should be the least restrictive and recorded.

Staff Ratios to Children, Young People and Adults at Risk

There must always be a minimum of two responsible adults present for any activities.

Lone and One to One Working

We will avoid lone working, one to one working with children and adults at risk whenever possible to protect both individuals. A risk assessment will always be undertaken to ensure:

- the care or activity provided is suitable for one-to-one working,
- the lone worker has been recruited, trained and supervised to undertake this particular role,
- that health and safety issues have been identified and recommendations followed,

- safeguards are in place to protect individual's rights to safe working practice, •
- safeguards are in place in relation to strategies for emergency situations, •
- relevant business insurance is in place for use of personal vehicles.

Young People who work in our Organisation

All young people who are undertaking volunteer work, apprenticeships or work experience within our organisation/group are to be included within this policy and their safeguarding as individuals given the same importance as all young people we come into contact with. Any disclosures, observations of possible harm or disturbing behaviour must be reported to the Lead or Deputy immediately.

They will also require an induction programme that includes their commitment to safeguarding within the remit of the safeguarding policy and in line with all staff induction.

In addition, information on the young person's contacts recorded as relevant e.g. parents, carers, school representatives and any supervisors, with emergency contact numbers.

We will check with the relevant local authority's education welfare team to see if an employment permit is required for any young people working with us and, in the cases of live performances, if a child performance licence is required.

Codes of Conduct

We aim to provide a safe environment free from discrimination, upholding and promoting equality, diversity and inclusion. We undertake to:

- treat all children and young people and adults at risk with respect and dignity
- ensure that their welfare and safety is paramount at all times
- maintain professional boundaries both face to face and when using technology
- always listen to individuals and take account of their wishes and feelings
- always act in a professional way and not accept bullying, swearing or other disruptive behaviour
- liaise openly with parents and carers
- only use appropriate physical contact if necessary
- avoid being alone with children, young people and adults at risk whenever possible
- listen to, and act upon, any disclosures, allegations, or concerns of abuse
- participate in approved safeguarding training at appropriate levels
- ensure restraint is only used as part of an agreed plan by staff trained in the use of the particular restraint or as an emergency action to protect from harm. All use of restraint will be reported and recorded by the member of staff concerned to the Lead or Deputy for safeguarding and to the relevant manager.
- follow our safeguarding policy at all times
- make activities fun and enjoyable

Recognising concerns - signs and indicators of abuse.

All staff should be aware of indicators of abuse and neglect so that staff are able to identify cases of individuals who may be in need of help or protection. Staff should be aware that individuals can be at risk of harm inside and outside of attending Project 21, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff should consider whether members might be at risk of abuse or exploitation in situations outside their families – harms take a variety of different forms and individuals can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and recognise that individuals are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline. Children can also abuse other children online. This can include but not limited to abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL.

Indicators of abuse and neglect

Abuse is defined as a form of maltreatment. Somebody may abuse or neglect an individual by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse. Individuals may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or young person.

Recognising Abuse in Children Young People and Adults at Risk (not an exhaustive list)

The following list is for guidance only. It is important to be observant, listen to what is being said and record. e.g. is what you are observing and being told about an injury consistent with the injury?

- Abuse related to faith or belief
- Alcohol and Substance misuse
- Breast Ironing
- Carrying offensive weapons
- Child criminal and sexual exploitation including County Lines
- Child on child abuse, including sexual violence and upskirting
- Concealed pregnancy
- Criminal exploitation
- Discriminatory
- Domestic abuse, including "honour" based abuse
- Emotional
- Exploitive use of technology
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Forced marriage
- Gangs
- Gambling
- Hate and "mate" crime

- Hazing and initiation rites
- Hoarding
- Modern slavery
- Neglect and acts of omission
- Online safety
- Organisational or institutional
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual
- Trafficking • Self-harming.

Online safety and filtering and monitoring

The Trustees have due regard to ensure that Project 21 has an approach to online safety, and has a clear policy on use of communications technology . Online safety will be a running and interrelated theme when devising and implementing policies and procedures.

Online safety issues can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, religious abuse, radicalisation or extremism;
- Contact: being exposed to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- Conduct: online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images, and online bullying); and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or pupils are at risk this should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

Procedures

If staff notice any indicators of abuse/neglect or signs that a young person may be experiencing a safeguarding issue they should record their concerns on a recording form for safeguarding concerns which is available online and forward it to the DSL without delay.

If an allegation or disclosure of abuse against an adult or young person, it is important to:

- Stay calm and listen carefully;
- Accept what is being said;
- Allow the person to talk freely – do not interrupt or put words in their mouth;
- Only ask questions, when necessary to clarify, do not investigate or ask leading questions;
- Reassure the person, but don't make promises which it might not be possible to keep;

- Do not promise confidentiality;
- Emphasise that it was the right thing to tell someone;
- Reassure them that what has happened is not their fault;
- Do not criticise the perpetrator;
- Explain what has to be done next and who has to be told;
- Make a written record, which should be signed and include the time, date and your position in Project 21;
- Do not include your opinion without stating it is your opinion;
- Pass the information to the DSL or alternate without delay;
- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing.

When a record of a safeguarding concern is passed to the DSL, the DSL will record the time and date the record of concern was received. The DSL will assess the concern and, taking into account any other safeguarding information known about the person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached or may be a person in need. If the DSL is unsure whether the threshold has been met, they will contact the Multi-Agency Safeguarding Hub (MASH) Professional Consultation Line for advice (0345 606 1499).

Where the DSL believes that a person may be at imminent and significant risk of harm, they should call Customer First immediately and then complete the Suffolk Safeguarding Partnership MARF within 24 hours to confirm the referral. In these circumstances, it is important that any consultation should not delay a referral to Customer First. Where a safeguarding concern does not meet the threshold for completion of a MARF, the DSL should record how this decision has been reached and should consider whether additional needs have been identified that might be met by a coordinated offer of early help. Staff might be required to contribute to multi-agency plans to provide additional support.

Project 21 will endeavour to obtaining more than one emergency contact number for each member.

Project 21 staff must ensure that they are aware of the procedure to follow when a member goes missing from a session.

Data Protection

We will treat any personal information by which an individual can be identified, for example, name, address, and email, in accordance with the provisions of Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR) and will not share information with any third party, except where required by law.

Confidentiality

This policy is in line with government guidance about confidentiality and these details will be made available to all staff, children, young children, adults at risk, parents and carers.

We Project 21 fully endorses the principle of the welfare of children, young people and adults at risk, overriding any obligations of confidence we may hold to others. No one working, or involved, with our organisation can promise absolute confidentiality. Individual cases will only be shared or discussed on a “need to know” basis.

Media Enquiries

All media enquiries will be handled by the Project Manager in the first instance in conjunction with the Chair of Trustees.

Managing allegations made against staff, volunteers and contractors

If a safeguarding concern or allegation is raised against an adult in a position of trust at Project 21 the Safeguarding Policy will be followed.

An allegation that may meet the harm threshold is any information which indicates that a member of staff /volunteer may have:

- behaved in a way that has harmed a member;
- possibly committed a criminal offence against or related to a member; or
- behaved towards a member that indicates he/she may pose a risk of harm to children; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children. This applies to any person the member of staff, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in Project 21 premises.

Concerns that do not meet the harm threshold – Low-level concerns.

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of Project 21 may have acted in a way that: Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority. Examples of such behaviour could include but are not limited to: Being overly friendly with children, having favourites, taking photographs of children on a mobile phone, engaging with a member on a one-to-one basis in a secluded area or behind a closed door, humiliating members.

Project 21 recognises the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. Project 21 will create this culture by: Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

Address unprofessional behaviour and supporting the individual to correct it at an early stage.

Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

Helping to identify any weakness in the safeguarding system.

If the concern is raised via a third party, the Project Manager will collect evidence where necessary by speaking: Directly to the person who raised the concern, unless it has been raised anonymously to the individual involved and any witnesses. They will use the information collected to categorise the type of behaviour and determine any further action, in line with Project 21s staff code of conduct. The Project Manager will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the deputy DSL or the safeguarding trustee.

All low-level concerns will be recorded in writing. Records will be: Kept confidential, held securely and comply with the DPA 2018 and UK GDPR; reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, a decision on a course of action will be made, either through disciplinary procedures or,

where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the Local Authority Designated Officer. Retained at least until the individual leaves employment. Where a low-level concern relates to a contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

Project 21 will not include low-level concerns in references unless: The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance. If any member of staff has concerns that a colleague, volunteer or contractor might pose a risk, it is their duty to report these to the Project Manager. Where the concerns or allegations are about the Project Manager, these should be referred to the Chair of Trustees. The Chair of Trustees should report the concern to the Local Authority Designated Officer (LADO) within one working day.

Use of Project 21 premises for activities

- The Trustees/Project Manager will ensure that where premises are hired or rented out to organisations or individuals, sports associations or service providers to run community or extra-curricular activities appropriate arrangements are in place to keep users safe.
- The Trustees/Project Manager will seek assurance that the body concerned has appropriate child protection and safeguarding policies and procedures in place, including inspecting these as needed. Arrangements will also be put in place for the body hiring or renting the facilities or premises to liaise with Project 21 on these matters where appropriate.
- Where a lease, hire or free of charge use agreement is entered into the Trustees/Project Manager will ensure safeguarding requirements are included as a condition of use and occupation of the premises; this will make clear that any failure to comply would lead to termination of the agreement.

Whistleblowing

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider community) raises a concern about danger or illegality that affects others. The Trustees would wish for everyone to feel able to report any safeguarding concerns through existing procedures.

The governing body/proprietor recognises that members cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime and know that such concerns will be taken seriously by the Project Manager/DSL including deputy DSL and Safeguarding Trustee.

Photography & Filming Guidance

Both still and moving images are key to recording the successes and achievements of children, young people and adults at risk in their lives and activities. However, it is vital to remember that images (especially digital images) can be used, shared, stored and/or distributed inappropriately, and that their storage and use must comply with UK GDPR guidance. It is therefore important to be clear about:

- explaining to parents and carers why caution is necessary
- the purpose of individual or group images during activities e.g. parent's and carer's own record, media and publicity etc
- the content required when using a professional photographer
- informing parents and seeking their consent for any publication or media use
- publishing only necessary identifying details alongside individual's photos in newspapers, websites etc
- taking photographs openly and away from sensitive areas (changing rooms, toilets, etc)
- the suitability of clothing e.g. swimsuits
- all those taking photos signing a registration form, which also identifies the purpose and use of any images
- ensuring secure storage of all images
- identifying how long unused images will be retained
- identifying how long copies of published images will be retained.

The above guidance applies to all still and moving images, however they are created (mobile phone, still camera, video camera etc). The type of equipment and the equipment's owner should also be recorded on the registration form.

Transport

Project 21 will ensure the following:

- written permission is gained from parents or carers to transport children, young people and adults at risk
- the driver will have a list a of who is being transported
- any member being transported must have made available an emergency contact number.
- journeys are planned regarding time, distance and stopping points
- Consideration is given if another driver might be required or the possible need for extra supervision
- emergency procedures are in place
- drivers are recruited under safeguarding recruitment procedures, are suitably qualified to drive the required vehicle, provide proof of insurance regarding business use and comprehensive insurance and can evidence the vehicle is roadworthy and suitable for transporting each individual
- drivers provide suitable and age-appropriate seat belts, booster seats and wheelchair anchor points
- drivers avoid transporting children, young people or adults at risk on their own

Activities, Events and Visiting Speakers/Activity Leaders

Project 21 will always ensure visitors and activities undertaken are risk assessed, and we are committed to:

- ensuring that those who run activities have the expertise, knowledge and skills to do so properly
- completing a risk assessment which involves identifying risks and the means of reducing or eliminating those risks for all activities or events

- risk assessing any changes being made to activities or events involving children, young people and adults at risk
- having a plan in place if the event or activity has to be cancelled
- having a plan in place in case of emergency including contact numbers
- implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis

The Late Pick Up of a Child, Young Person or Adult at Risk

If attempts to contact the parent and nominated emergency contact fail, then the supervising adult should wait with the young person or adult at risk with other staff, volunteers or parents wherever possible.

Staff, paid and unpaid, should avoid:

- taking the young person or adult at risk home or to another location
- waiting alone with the young person or adult at risk in a vehicle or at the venue
- sending the young person or adult at risk home with another person, without parental consent
- leaving the young person or adult at risk alone.

If all attempts to make contact fail, it may be advisable to contact the police for advice.

Young Person or Adult goes missing

If a young person or adult at risk goes missing from the group or organisation it should be reported to the police. Use 999 where there is a concern that they cannot be found or are vulnerable.

A missing person may be assessed as 'at risk' if they fit one or more of the following categories.

- is under 16
- has expressed feelings of suicide
- has dementia
- has been acting totally out of character
- has mental health issues
- is under increased stress
- has an illness or a physical disability
- has a learning disability
- is in need of regular medication/care

The Lead or Deputy for Safeguarding should be informed as soon as possible, and all details and actions recorded, signed, timed and dated.

First Aid

Project 21 First Aiders have completed specific training as set out by the Health and Safety Executive (HSE). They hold valid and up to date certificates of competence issued by an organisation whose training and qualifications are approved by the HSE.

The duties of a First Aider are:

- to give immediate First Aid to children, young people, adults at risk, staff or visitors when needed

- to ensure that an ambulance or other professional medical help is called when necessary

Project 21 undertakes to ensure there is always a trained First Aider on site at our venues or, if other venues used that they have appropriate first aid cover.

We also provide training and guidance on dealing with hazardous materials such as blood, other bodily fluids and chemicals. We ensure sufficient equipment is available to deal with accidents or spillage.

All incidents will be reported and recorded in the First Aid and Incident Accident Books

Buildings and Venues

Safeguarding risk assessments will be carried out on all building and venues used by our organisation or by the host's venue management, such as community centres/spaces.

The safeguarding risk assessment should cover:

- access especially how people enter and leave the building
- signing in protocol
- use of keys
- toilets and changing rooms
- any outside space
- car parks
- any other relevant issues

All users of Project 21 premises will confirm in writing that they have robust safeguarding policies, procedures and safer recruitment in place.

Useful Contacts:

- Multi-agency Safeguarding Hub (MASH) Professional Helpline: 0345 606 1499
- MASH webchat facility Customer First (Professional Referral Line) for use in emergencies only: 0345 606 6167
- Customer First: 0808 800 4005 Police (emergency only): 999
- Suffolk Police main switchboard: 01473 613500
- Suffolk Police Cybercrime Unit: 101 Suffolk Local Safeguarding Partnership
www.suffolksp.org.uk Suffolk County Council:
www.suffolk.gov.uk/communityandsafety/staying-safe-online/e-safer-Suffolk/ LADO 0300 123 2044 or lado@suffolk.gov.uk or on the LADO pages on Suffolk Safeguarding Partnership website.