

SAFEGUARDING POLICY

INTRODUCTION

Rochdale Dawah Centre (RDC) makes a positive contribution to a strong and safe community and recognises the right of every individual to be safe.

RDC works with adults, children, young people, and/or vulnerable adults through a range of community and outreach services delivered from our premises or online. RDC may also come into contact with children and vulnerable adults when working with outside organisations through the delivery of projects or programmes.

The types of contact with children and vulnerable adults will be controlled, in collaboration with our partners. RDC ensures that partner organisations have appropriate and up-to-date safeguarding policies and procedures.

This policy seeks to ensure that RDC undertakes its responsibilities concerning the protection of children and vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff/volunteers in their practices and clarifies the organisation's expectations.

LEGISLATION

The principal pieces of legislation governing this policy are:

- Working Together to Safeguard Children 2010
- The Children Act 1989
- The Adoption and Children Act 2002
- The Children act 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Standards Act 2000
- Public Interest Disclosure Act 1998
- The Police Act – CRB 1997
- Mental Health Act 1983
- NHS and Community Care Act 1990
- Rehabilitation of Offenders Act 1974

Definitions

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.

It can take several forms, including the following:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying
- Neglect
- Financial (or material) abuse

Definition of a child

A child is a person under the age of 18 (as defined in the United Nations Convention on the Rights of a Child).

Definition of Vulnerable Adults

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

This **may** include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Has a history of substance misuse
- Is homeless

Definition of Digital Safeguarding

RDC carries out operations in face-to-face activities at our registered premises. We may undertake some projects and programmes online via our website, social media, and online webinars. Digital safeguarding is similar to safeguarding in any other context, that is people and organisations working to prevent and stop both the risks and experience of abuse or neglect.

Online safeguarding involves a wide range of potential harms and should be assessed concerning both victim and perpetrator.

We define online abuse and harassment as behaviours that constitute digital or online harm. Further behaviours that constitute digital or online harm include image-based abuse, identity fraud, and exploitation.

RDC understands there are three key main categories of digital harm:

- **Content** – this is content that may be unsuitable or illegal. This might include pirated content or offensive language and behaviour.
- **Contact** – this may be unwanted or inappropriate contact, such as grooming or unsolicited sexual contact
- **Conduct** – this could be as a recipient or as an active participant – oversharing personal information or the bullying of another person

Where RDC works directly or indirectly with children or vulnerable adults, we will identify, report and address digital safeguarding according to the definitions and guidelines within this policy. This also applies to any instance in which our staff, partners or users are victims or perpetrators of digital harm.

Digital safeguarding: data collection, privacy, and online safety

To guarantee the safety of individuals in the digital real, RDC will embed the following considerations into our ways of working: consent, anonymisation, data collection and storage, GDPR, and Data Privacy Impact Assessment (DPIA).

Ensuring the safety of individuals in the digital realm also includes using effective encryption, passwords and following the requirements of the General Data Protection Regulation (GDPR).

We have expected standards of conduct across our paid and voluntary staff, including standards related to privacy and security. Furthermore, our staff are instructed to create strong passwords and update them regularly to prevent data breaches that may lead to further digital or online harm.

Responsibilities

All staff (paid or unpaid, and including volunteers, contractors, consultants, and associates) have the responsibility to follow the guidelines laid out in this policy and related policies and to pass on any welfare concerns using the required procedures. We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding, and positively involve people in developing safe practices.

Additional specific responsibilities

Staff and management have a collective responsibility to ensure:

- RDC has appropriate policies and procedures in place, which are followed by all management, staff, volunteers, and beneficiaries
- Checks to assess whether people are suitable to act in their roles.
- Identification and handling concern in a full and open manner
- A clear and established system of referring or reporting to relevant organisations as soon as concerns are suspected or identified
- Setting out risks and how they will be managed in a risk register which is regularly reviewed
- Following statutory guidance, good practice guidance, and legislation relevant to their charity: this guidance links to the main sources of information
- Quick response to concerns and carry out appropriate investigations
- Take harm seriously and not downplay failures
- The balanced management board and does not let one management member dominate its work
- Protecting people from harm is central to its culture
- Having enough resources, including trained staff/volunteers/management for safeguarding and protecting people
- The conducting of periodic reviews of safeguarding policies, procedures, and practice

The **Designated Management for Safeguarding** will be appointed to lead on safeguarding matters within the Board of Management

The Senior Management Team has the responsibility to ensure:

- The policy is accessible
- The policy is implemented
- The policy is monitored and reviewed
- Sufficient resources (time and money) are allocated to ensure that the policy can be effectively implemented
- Promote safeguarding within the organisation, have oversight and provide support.

The **Designated Safeguarding Lead Officer** is **Mohammed Towhasir**. They have a specific responsibility to ensure:

- Promoting the welfare of children and vulnerable adults
- Ensure staff (paid and unpaid) have access to appropriate training
- Receive staff concerns about safeguarding and respond to all seriously, swiftly, and appropriately
- Take forward concerns about responses
- Keep up to date with local arrangements for safeguarding and CRB
- Develop and maintain effective links with relevant agencies.

Implementation Stages

The scope of this Safeguarding Policy is broad-ranging and in practice, it will be implemented via a range of policies and procedures within the organisation. These include:

SAFE RECRUITMENT

RDC ensures safe recruitment by following its recruitment policy and Equality and Diversity policy. RDC will provide the following safeguarding statement in recruitment adverts or application details – ‘recruitment is done in line with safe recruitment practices.’

- Job or role descriptions for all roles involving contact with children and/or vulnerable adults will contain a reference to safeguarding responsibilities.
- Shortlisting is based on formal application processes/forms and not on the provision of CVs
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- Standard DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults. Carryover DBS checks from another employer will not be deemed sufficient. References will also be required for all staff (paid or unpaid).

Criminal Bureau Records Gap Management

The organisation commits resources to provide Criminal Bureau Records check on staff (paid or unpaid) whose roles involve contact with children and /or vulnerable adults. Some roles with direct contact with children, young people, or vulnerable adults, may be exempt from the Rehabilitation of Offender’s Act by law and appropriate enhanced checks will take place.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act (ROA) allows most convictions and all cautions, reprimands, and final warnings to be considered ‘spent’ after a certain period. This period – known as the ‘rehabilitation period’ – is determined by the sentence or disposal given, rather than by the nature of the offence. The ROA gives people with ‘spent’ convictions, cautions reprimands final warnings the legal right not to disclose them when applying for most jobs, most courses, and all insurance purposes.

Service delivery contracting and subcontracting

- There will be systematic checking of safeguarding arrangements of partner organisations
- Safeguarding will be a fixed agenda item on any relevant partnership reporting meetings.
- Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding, and noncompliance procedures

Communication, training, and support for staff

RDC commits resources for induction, training of staff (paid and unpaid), effective communications, and support mechanisms concerning Safeguarding.

The induction will include:

- Discussion of the Safeguarding Policy (and confirmation of understanding)
- Discussion of other relevant policies
- Ensure familiarity with reporting processes, the roles of line manager and Designated Senior Manager (and who acts in their absence)

Training

All staff who, through their role, are in contact with children and /or vulnerable adults will have access to safeguarding training at an appropriate level.

Communications and discussion of safeguarding issues

Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice:

- Team meetings
- Senior Management Team meetings
- Management meetings

Support

We recognise that involvement in situations where there is risk or actual harm can be stressful for the staff concerned. The mechanisms in place to support staff include:

- Debriefing support from a member of the RDC team or the HR, Legal, and Compliance Officer at RDC for paid and unpaid staff so that they can reflect on the issues they have dealt with.

REPORTING

Safeguarding Reporting

The process outlined below details the stages involved in raising and reporting safeguarding concerns at RDC.

1. Communicate any safeguarding concerns with your immediate manager or RDC's HR, Legal and Compliance Officer, or Safeguarding Lead and update RDC's Complaints Logbook. Where necessary, for example in the interest of preventing further harm to a vulnerable adult or child, your and/or your immediate manager will alert the relevant authorities. Your manager will then report the concerns to RDC's Safeguarding Lead.
2. If your immediate manager is implicated, then refer to their line manager or peer, who will have the responsibility to update RDC's Complaints Logbook and report the concerns to RDC's Safeguarding Lead.
3. Communicate any concerns to the partner charity where applicable, matching their processes. Keep RDC's Safeguarding Lead informed about communications with the partner charity (e.g., CCing in emails).
4. RDC's Safeguarding Lead will communicate the safeguarding concerns with the Board of Management to identify the next steps. The Charity Commission may become involved in managing the safeguarding concerns.
5. Where necessary, the Board of Management will involve the appropriate designated authorities as part of RDC's allegations management procedure.

Serious incidents reporting

The process for raising and reporting serious incidents at RDC reflects the safeguarding reporting process outlined above.

The Board of Senior Management will make a report to the appropriate authorities if a serious incident occurs.

The Management will inform where there has been significant harm (or risk of harm) caused by RDC's staff, volunteers, or operations. If RDC becomes aware of significant harm (or risk of harm) caused by a partner organisation, the partner has to report it; however, if the partner organisation does not report it, RDC should inform the relevant bodies.

This will usually be if any of the following occur: *

- a. incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults or children) which have resulted in or risk significant harm to them and:
 - i. this happened while they were under the care of the charity
 - ii. someone connected with the charity, for example, a trustee, staff member, or volunteer, was responsible for the abuse or mistreatment (alleged or actual). *For signs of abuse – see appendix 2*
- b. other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity's activities.
- c. breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is

disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children and/or adults at risk.

- d. financial misdemeanours and any serious risks to our reputation.
- e. harm to RDC's beneficiaries, staff, volunteers, or others who come into contact with our charity through its work (who are collectively referred to throughout this guidance as people who come into contact with your charity through its work).
- f. loss of RDC's money or assets.
- g. damage to property
- h. harm to the organisation's work or reputation

Allegations Management

RDC recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation.

The process for raising and dealing with allegations is as follows:

1. Any member of staff (paid or unpaid) from RDC is required to report any concerns in the first instance to a member of the Senior Management Team (Senior Management Team), Safeguarding Lead or the HR, Legal and Compliance Officer at RDC. The Senior Management Team or HR, Legal and Compliance Officer will then evaluate the concerns or allegations and escalate them according to their nature to RDC's Board of Management.
2. If an allegation is about RDC's staff, contact the relevant local authority. If an allegation is about a partner, contact their Safeguarding Lead or Director who will be responsible for reporting to the Local Authority Designated Officer (LADO) and seeking advice on the best course of action.
3. However, if the partner fails to report to the LADO or RDC is so concerned as to avoid following up with the partner in the first instance, RDC will report directly to the LADO of the relevant Local Authority.
4. Follow the advice provided by the partner charity or local authority.
5. In order to investigate a complaint against an employee of misconduct, RDC may suspend the employee for so long as may be necessary to carry out a proper investigation and hold any appropriate disciplinary hearing.
6. The RDC Team, Safeguarding Lead, or the HR, Legal, and Compliance Officer will contact the Board of Management or, in the event of sensitive information, the Designated Safeguarding Trustee, as soon as they become aware of a serious safeguarding incident.
7. In the event that a safeguarding allegation is made against a member of RDC's leadership (e.g., the Safeguarding Lead), the member of staff reporting the incident will report the concerns to an impartial member of staff, the RDC Team, or the Board of Management as appropriate.
8. RDC's allegations management will follow the practices embedded into our policies.

RDC recognises its legal duty to report any concerns about unsafe practices by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA), according to the [ISA referral guidance document](#).

RDC's Management recognise their duty to oversee this Safeguarding Policy and engage with the Safeguarding Lead in identifying best practices on safeguarding.

Appendix 1 has the RDC Form for reporting Safeguarding concerns

RDC Management are:

- Abjal Ali
- Mohammed Towhasir
- Aitzaz Zafar

MONITORING

The HR, Legal, and Compliance Officer, with the support of RDC's Senior Management Team, will monitor the following safeguarding aspects on a rolling basis:

- Safe recruitment practices
- DBS checks undertaken for relevant roles
- References applied for new staff
- Training – register/record of staff training on child/vulnerable adult protection for those relevant roles
- Monitoring whether concerns are being reported and actioned
- Checking that policies are up to date and relevant
- Reviewing the current reporting procedure in place
- Ensuring a Designated Senior Manager responsible for Safeguarding is in post
- Ensuring that paid and voluntary staff are aware of their safeguarding responsibilities and are comfortable reporting safeguarding concerns where necessary.

Findings concerning the above safeguarding aspects will be reported to the Senior Management Team and the Board of Management as part of the latter's oversight duties.

Monitoring and Reporting for our partners

With projects commissioned and/or funded by RDC, we may require our partners to provide redacted safeguarding reports in the event of serious incidents. The purpose of obtaining such reports will be to ensure that the appropriate steps are taken to address safeguarding concerns/incidents and to avoid negative impacts on RDC's reputation due to unsatisfactory allegation management by our partners.

USEFUL RESOURCES

Support for Adults

Family Lives: www.familylives.org.uk
Crime Stoppers: www.crimestoppers-uk.org
Victim Support: www.victimsupport.org.uk
The Samaritans: www.samaritans.org
MIND: www.mind.org.uk
NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

Respond: www.respond.org.uk
Mencap: www.mencap.org.uk

Domestic Abuse

Refuge: www.refuge.org.uk
Women's Aid: www.womensaid.org.uk
Sateda (local charity addressing domestic abuse): www.sateda.org
Men's Advice Line: www.mensadviceline.org.uk

Mankind: www.mankindcounselling.org.uk

Honour-based Violence

Forced Marriage Unit: www.gov.uk/guidance/forced-marriage

Online Safety

UK Safer Internet Centre: www.saferinternet.org.uk

Net Aware: www.net-aware.org.uk

Get Safe Online: www.getsafeonline.org

Radicalisation and Hate

Counter-Terrorism Internet Referral Unit: www.gov.uk/report-terrorism

True Vision: www.report-it.org.uk

MANAGING INFORMATION

Information will be gathered, recorded, and stored under RDC's Data Protection Policy.

All staff must be aware that they have a professional duty to share information with other agencies to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, the information will be shared on a need-to-know basis only, as judged by the Safeguarding Lead.

All staff must be aware that they cannot promise service users or their families/carers that they will keep secrets.

Conflict Resolution and Complaints

Conflicts in respect of the safety of children or vulnerable adults will be taken forward by our Safeguarding Lead. Alternatively, it is possible to either raise a complaint through our External Complaints Procedure or our internal Grievance Policy and Procedure.

Communicating and reviewing the policy

This policy will be reviewed by the Senior Management Team and agreed upon by the RDC management every two years and when there are changes in legislation.



Appendix 1- Reporting Suspected Abuse

Confidential Recording Sheet

Organisation

Name of person reporting

Age and date of birth

Ethnicity

Religion

First Language

Disability

Parent's/carer's name (s)

Home address/Tel. No.

Are you reporting your concerns or reporting someone else's? Please give details.

Brief description of what has prompted the concerns: including date, time, and specifics.

Any physical signs? Behaviour signs? Indirect signs?

Have you spoken to the child/young person? If so, what was said?

Have you spoken to the parent(s)/carer(s)? If so, what was said?

Has anybody been alleged to be the abuser? If so, please give details.

Have you consulted anybody else? Please give details.

The person reported to and date of reporting.

Signature of person reporting

Date

Internal Use Only

Action taken

Notes

To ensure that information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern. In the recording, you should confine yourself to the facts and distinguish what is personal knowledge and what others have told you. Do not include your own opinions.

Appendix 2- Recognising and Responding to Abuse

The following signs may not be indicators that abuse has taken place, but the possibility should be considered.

Physical signs of abuse

Physical signs of abuse may include:

- Any injuries not consistent with the explanation given for them
- Injuries that occur to the body in places that are not normally exposed to falls or games
- Unexplained bruising, marks, or injuries on any part of the body
- Bruises that reflect hand marks or fingertips (from slapping or pinching)
- Cigarette burns
- Bite marks
- Broken bones
- Scalds
- Injuries that have not received medical attention
- Neglect, undernourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care
- Repeated urinary infections or unexplained stomach pains

Changes in behaviour which can indicate physical abuse

- Fear of parents/carers being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed; for example, wearing long sleeves in hot weather
- Depression
- Withdrawn behaviour
- Running away from home

Emotional sign of abuse

Emotional signs of abuse may include:

- A failure to thrive or grow, particularly if a child/young person puts on weight in other circumstances e.g. in a hospital or away from their parents/carers
- Sudden speech disorders
- Persistent tiredness
- Development delay, either in terms of physical or emotional progress

Changes in behaviour that can also indicate emotional abuse include:

- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Being unable to play
- Attention- seeking behaviour
- Fear of making mistakes
- Self-harm
- Fear of parent/carer being approached regarding their behaviour

Sexual abuse

Physical signs of sexual abuse may include:

- Pain or itching in the genital/anal areas
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour that can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawing or language
- Bedwetting
- Eating problems such as over-eating or anorexia
- Self-harm or mutilation, sometimes leading to a suicide attempt
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way with adults

Neglect

Physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other children/young people
- Being constantly dirty or smelly
- Loss of weight or being constantly underweight
- Inappropriate dress for the conditions

Changes in behaviour that can also indicate neglect include:

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised

Bullying

Signs of bullying include:

- behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go training or competitions
- an unexplained drop off in performance
- physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes, bingeing e.g. on food, alcohol, or cigarettes
- a shortage of money or frequents loss of possessions

*It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place. It is **NOT** the responsibility of those working in RDC to decide that abuse is occurring. It **IS** their responsibility to act on any concerns.*

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Version Number and Date	Version 3 January 2021
Designated Person	Mohammed Towhasir (with DBS)
Second Designated Person	Afdal Ali (with DBS)

Revisions

Version Number	Date	Changes	Author (Name and Job Title)
Version 1	01/01/2019	First Written	Afdal Ali
Version 2	01/01/2020	Review	Afdal Ali
Version 2	01/01/2021	Review	Afdal Ali