

SAFEGUARDING POLICY FOR CHILDREN, YOUNG PEOPLE, AND ADULTS

Organisation Name: Sponsors for Educational
Opportunity (SEO London)

Sponsors for Educational Opportunity, Ltd (SEO London)

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SEO London is a charity limited by guarantee registered in England and Wales: Company no. 04159512; Charity no. 1097830

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Policy Date

This policy was agreed and disseminated on **1 July 2024** and will be reviewed annually or when there are substantial organisational changes.

Date of next review: 1 July 2025

Context

SEO London is a registered charity that operates from 41 Great Guildford Street, London, SE1 0ES. SEO London supports school children [15-18 years old], undergraduates, graduates, and junior professionals and operates across the UK and in Paris, France as SEO Europe. SEO London's mission is to prepare talented students from underrepresented backgrounds for career success. The charity delivers specialist career-focused education and training programmes. These include in-person events and activities in conjunction with competitive sponsor firms as well as virtual engagement opportunities. In-person events take place primarily at sponsor firms' offices or hired event spaces. SEO London is regulated by the Charity Commission and has approximately 70 staff members. Circa 800 volunteers from sponsor firms and from the charity's alumni are engaged annually to contribute to programme delivery. SEO London delivers programmes to over 3700 children, young people, and adults each year.

Statements and Aims

Policy Statement

SEO London recognises that the welfare of all children, young people and adults at risk is paramount and that *all* have equal rights of protection.

Organisations that work with, or encounter, children, young people and/or adults at risk need to have safeguarding policies and procedures in place. All parties have responsibilities for safeguarding; this includes SEO London, its staff, volunteers and partner firms' representatives, carers and/or families. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall into the remit of this policy.

To support our duty of care and responsibilities, SEO London:

- Has appointed internal safeguarding leads (staff members).
- Also has a Lead Representative for Safeguarding who advises the Board of Trustees.
- Is clear about peoples' responsibilities and accountability.
- Has a culture of listening to children, young people and adults at risk.
- Undertakes safer recruitment practices for all SEO London staff and volunteers who will be working with SEO London's children, young people and adults at risk.
- Has procedures for safeguarding children, young people and adults at risk.

- Has procedures for dealing with allegations against, and concerns about, any SEO London staff or volunteers.
- Makes sure staff - paid and unpaid - have mandatory induction and further safeguarding training, supervision, reviews and support.
- Has agreements in place about working with other organisations and agencies.

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 Designated Lead for Safeguarding (or the Deputy, if the Lead is unavailable).

Our Safeguarding Policy is approved by our Board and will be reviewed and updated annually by the internal Safeguarding Leads. 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 encounter our organisation, e.g., children, young people, adults at risk, their parents, carers, families and others such as organisational partners and fundraisers.

SEO London aims to comply with all government PREVENT DUTY Guidance.

Equal Opportunities Statement

We recognise that anyone can become subject to discrimination, harassment or victimisation, including because of age, culture, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and/or sexual orientation.

Comments and actions that contribute to discrimination, harassment or victimisation are not acceptable and will be challenged. Where relevant, SEO London will record and share details with relevant agencies.

SEO London 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.

Internal Safeguarding Leads

Designated Safeguarding Lead & Deputy Designated Safeguarding Lead

The Safeguarding Lead and Deputy are responsible for overseeing and ensuring full implementation of SEO London's safeguarding standards and policy, which includes eSafety.

Their responsibilities include:

- Monitoring and recording concerns.
- Making referrals to social care, or police, as relevant, without delay.
- Liaise with other necessary agencies.

- Arrange training for SEO London staff and volunteers.

Designated Safeguarding Lead (DSL): **Charlotte Tillson**, Programme Manager: Investment Banking Workstream.

Deputy Designated Safeguarding Lead (DDSL): **Chanelle Francis**, Programme Manager: Alternative Investment Programme.

Contact details: safeguarding@seo-london.org Phone number: +44 020 7400 0402

Senior Member of Executive team for Safeguarding

Our Safeguarding senior staff lead is **Abigail Moss (Chief Operating Officer)**

Contact details: Abigail.Moss@seo-london.org

Senior Safeguarding representative for SEO London's Board of Trustees

Our Lead Safeguarding representative for our Board of Trustees is **Duncan Perry**

Contact details: c/o Abigail.Moss@seo-london.org

Definitions

Definition of a child/young person

A child or young person is anyone who has not yet reached their 18th birthday (16th in Scotland). A person may also be considered as being a child if they are between 16 and 25 years if they have Special Educational Needs or Disability (SEND) and/or experience of local authority care.

Definition of an adult at risk

An adult at risk is a person over the age of 18 years who **(1)** has a need for care and support, **(2)** is experiencing, or is at risk of, abuse and neglect, and **(3)** as a result of those care needs, is unable to protect themselves from either the risk or the experience of abuse or neglect.

Related policies

Related documents are SEO London's:

- Data Protection Policy, which relates to the Data Protection Act 2018 (DPA 2018) and UK GDPR.
- Employee Code of Conduct. *
- Trustee Code of Conduct. *
- Volunteer Code of Conduct. *
- Participant Code of Conduct. *

- Whistleblowing Policy.
- Grievance Procedure.
- Disciplinary Procedure.
- Complaints Procedure.
- SEO London guidance and processes around participant and parent consent, permissions and booking of venues.

Our Codes of Conducts include expectations of conduct around use of social media, e-safety and cyber security. *

Whistleblowing

Whistleblowing is when someone raises a concern externally about a person or practice within the organisation, which will affect others in an illegal and or harmful way. SEO London promotes the sharing of any concerns regarding the safeguarding of children, young people and adults at risk - as soon as possible - with the internal Safeguarding Leads.

If individuals reporting their concerns within our organisation do not feel they have been acted upon, or the internal Safeguarding Leads have been compromised, these concerns can be reported to the Local Authority Designated Office (LADO) (England and Wales only) social care services, the police, and the Charity Commission. SEO London also has a separate and related Whistleblowing Policy – see above.

Safer recruitment

SEO London is committed to safer recruitment in line with the relevant legislation and guidance from government and the Charity Commission for recruiting all staff - paid or unpaid. Members of our HR team are trained in safer recruitment and attend at least one interview with every candidate, and hiring managers are introduced to the principles of safer recruitment.

All staff receive a DBS check when they join SEO London and this is renewed every 3 years. All staff working with school students and all Trustees apply for and receive an Enhanced DBS certificate.

Induction and training

We have a safeguarding induction and training strategy, clear job/role descriptions and responsibilities as they relate to safeguarding and visible procedures. All new Trustees and employees, including people working at SEO London on relevant placements, receive safeguarding training as part of onboarding and sign to record they have:

1. Received and understood this policy.
2. Been given relevant resources to support their role.
3. Understood SEO London's commitment to safeguarding.

Employees undertake further internal and online safeguarding training as required for their role and updated safeguarding training and/or refreshers are offered every 2 years, or less as required.

SEO London Staff working directly with at risk groups also undertake government training for PREVENT DUTY and as relevant for Female Genital Mutilation (FGM).

SEO London Mentors and volunteers

All Mentors

All Mentors working with students on our programmes receive group safeguarding training delivered by SEO London staff. This is reviewed yearly and updated training provided to volunteers who continue to work with SEO London. It is accompanied by guidance on how to ensure everyone is kept safe.

Mentors working with young people under 18 years old or known adults at risk

Mentors working with young people under 18 years old, or known adults at risk, can only do so once they have:

1. Attended a safeguarding training session.
2. Completed SEO London DBS and identification checks which have been signed off.

Verification checks include, but are not limited to, employment checks, photo ID and/or Disclosure and Barring Service (DBS) checks. These checks are performed in accordance with best practice.

All other volunteers

All other volunteers who support SEO London events or activities are under the supervision of an SEO London member of staff. Where relevant volunteers receive a summary of safeguarding principles and how to raise concerns.

One-to-one mentoring only happens online or in a public venue and between 8am and 9pm.

Working Practices

Consent and permissions

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

Consent is requested from parents in relation to our support to under-18s. We collect permissions for photographs and audio and video footage.

Activities, events and visiting speakers/activity leaders

We 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.
- Risk assessing any changes being made to activities or events involving children, young people and adults at risk.
- Having a written 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.
- Having a minimum of **two** responsible SEO London staff present for any events.

Incidents, including during residential events

SEO London staff will always attempt to contact the parent and/or nominated contact in an emergency. If this fails, the supervising adult will wait with the child, young person or adult at risk with other staff, volunteers or parents wherever possible.

Our staff are advised to avoid:

- Taking the child, young person or adult at risk home or to another location.
- Waiting alone with the child, young person or adult at risk in a vehicle or at the venue alone.
- Sending the child or young person home with another person without [the required parental] consent.
- Using a personal vehicle to chaperone a child, young person or adult at risk.

The internal Safeguarding Lead(s) will be informed as soon as possible, and all details and actions recorded following agreed procedure.

Young People who work in our organisation

All young people undertaking volunteer work, apprenticeships or work experience at SEO London are supported in the same way as a member of staff is and receive the same duty of care as all other young people we come into contact with. Any disclosures, observations of possible harm or disturbing behaviour should be reported to the DSL or DDSL immediately.

Conduct

We aim to provide a safe environment free from discrimination and which upholds and promotes equality, diversity and inclusion. We ask that everyone working for and with SEO London:

- Treats all children and young people and adults at risk with respect and dignity.
- Ensures that their welfare and safety is always paramount.
- Maintains professional boundaries both face-to-face and in virtual environments.
- Always listens to individuals and takes account of their wishes and feelings.
- Always acts in a professional way and doesn't accept bullying, swearing or other disruptive behaviour.
- Uses the internet and other forms of communication in a sensible and polite way.
- Only accesses websites, send messages or use other resources in such a way that doesn't hurt or upset anybody.
- Seeks permission if they want to take photographs or audio or video footage of other people.

These requirements are included in our Codes of Conduct and guidance – see above.

Responding to safeguarding concerns

We make our Referral Flowchart – see Appendix 1 below – highly visible and accessible to all staff and volunteers, including in our office, in guidance notes, on our intranet and during trainings.

We ask staff and volunteers to:

- Listen to, and act upon, any disclosures, allegations or concerns of abuse.
- Always follow our safeguarding procedures.
- Not maintain confidentiality if there is a concern about the welfare of a child, young person or adult at risk.
- Recognise abuse in children, young people and adults at risk – see Appendix 2 below.

Record keeping

At all times when required and especially where there is a safeguarding concern, SEO London staff and volunteers will:

- Record safeguarding incidents via our Disclosure form.
- Log all incidents via a secure Disclosure Log that is accessible only to the three internal safeguarding leads.
- Record fact-based details as a true record of:
 1. What has been monitored/observed.
 2. What has been said and by whom.
 3. What has given cause for concern.

4. What action has and/or will be taken including the reason for those actions and by whom.
 5. The reason stated for no action being taken.
- Be nonjudgmental.
 - Report in a timely way and within 24 hours.

Handling allegations

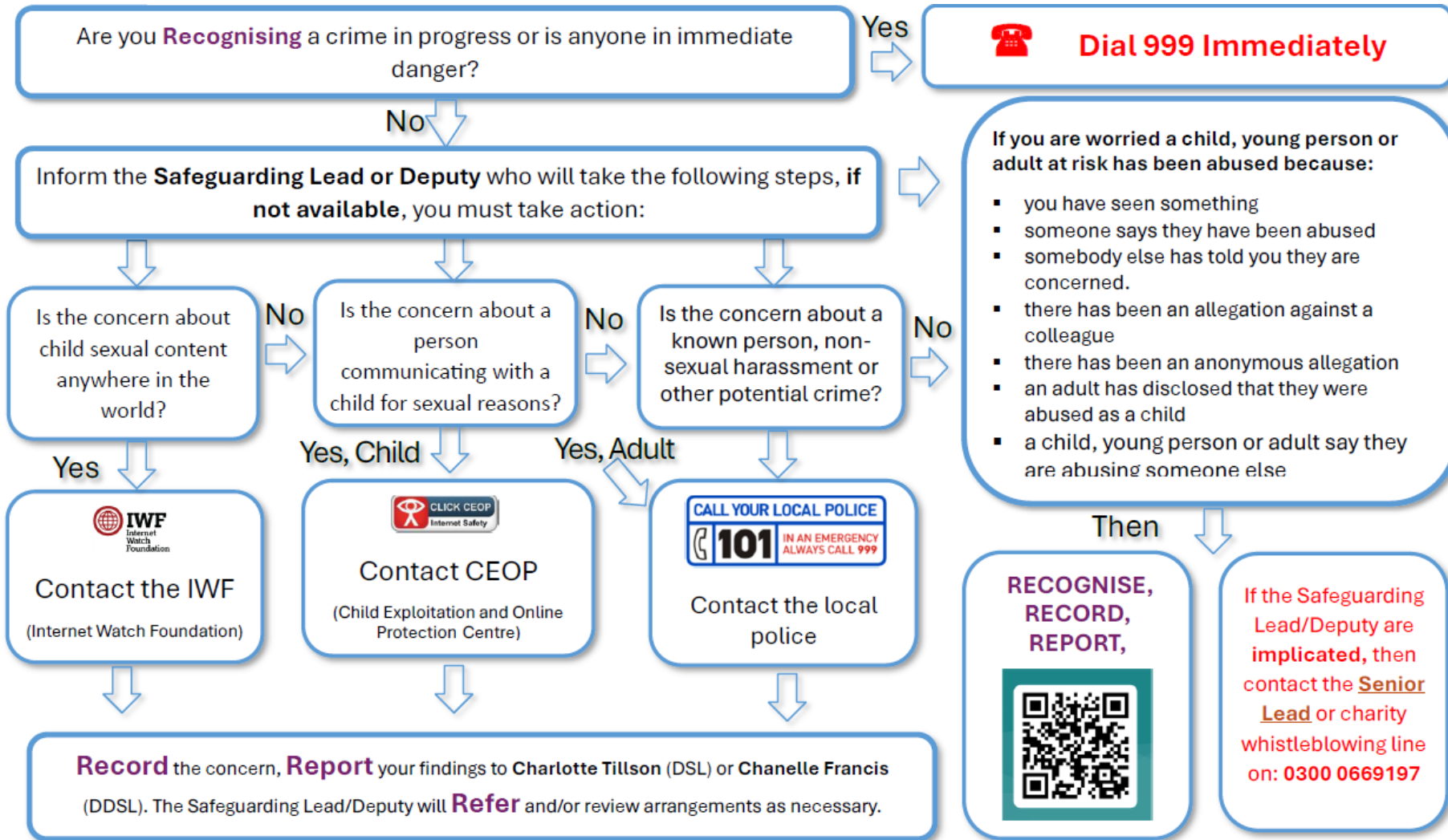
Our policies and procedures are in line with the statutory and Charity Commission guidelines and our internal procedures.

Where a safeguarding complaint or allegation is made with regards to behaviour or practice, the internal safeguarding leads will, in all cases, discuss the situation with social care services and/or the police before deciding about the best way forward. All serious incidents will be referred to the Trustees via the Safeguarding Representative for the Board of Trustees.

The Senior Safeguarding Lead is responsible for informing the DBS Records service, Charity Commission and/or other statutory bodies as relevant.

Appendices:

Appendix 1: Responding to concerns: Referral Flowchart – Child, Young Person and Adults at Risk



Appendix 2: Recognising abuse

PENS: the 4 main types of abuse

Recall these types of abuse by remembering P.E.N.S. If at any time you are uncertain do not hesitate to contact the DSL or DDSL.

<p>PHYSICAL</p> <p>Physical abuse is when someone hurts a child or young person on purpose. There are examples of physical abuse which also include hitting, inappropriate restraint, misusing medication and more. Signs and symptoms of physical abuse in children and young people can also be difficult to spot as, eg. they may cover up injuries.</p>	<p>EMOTIONAL</p> <p>Emotional abuse happens in many different ways. It can affect how a young person or child feels about themselves or how they fit in with friends, at school, or where they live. Emotional abuse can make someone feel inadequate, worthless or unloved - among other examples - and you may spot signs and symptoms. Attention-needing behaviour, or having difficulties making or maintain relationships, are some signs among others.</p>
<p>SEXUAL</p> <p>Sexual abuse is when a child is enticed or forced to take part in sexual activities. This kind of abuse does not always involve a high level of violence and the child may or may not be aware of what is happening. The abuse may be committed by adult men and women or by other children and young people.</p>	<p>NEGLECT</p> <p>Neglect is the ongoing failure to meet the basic needs of a child or young person and the most common form of abuse. A child or young person might be left hungry or dirty or without proper clothing, shelter, supervision, or healthcare. HThs can place children or young people in danger. It can sometimes be very difficult to <u>spot the signs</u>.</p>

Handling Disclosures:

When a disclosure is made by a child, young person or adult at risk it is important to:

- **Recognise, Record and Report.** See [Responding to Concerns Referral Flow Chart \(Appendix 1\)](#).
- Take what you are being told seriously (Recognise). Stay calm and reassure the person.
- Do not investigate by asking leading or closed questions. Take mental or writing notes and do not change/ dilute words used that are significant (Record).
- Do not delay informing the DSL/DDSL (Report).

And always:

- Seek advice from the DSL or DDSL.
- Make a careful recording of anything you are told or observe using the [Safeguarding Disclosure Form](#).
- Remember, you CANNOT promise a child or young person that you will keep what they have disclosed a secret.

A disclosure may come from:

- **Someone telling you (1)** they have or are being abused, **(2)** they have concerns about someone else, or **(3)** they are themselves abusing or likely to abuse someone else.
- **You wanting to disclose (1)** you have been abused, **(2)** you have concerns about someone else, or **(3)** you have witnessed abuse.