

4C UR Future Safeguarding Policy

Last Review Date: 14th December 2021

4C UR Future is committed to promoting the welfare of young people and vulnerable adults, and protecting them from harm. We wish to ensure all young people and vulnerable adults can participate in activities in an enjoyable and safe environment in which they can have fun and feel valued. The best interests of the young person or vulnerable adult are the priority. Our approach to safeguarding is based on respect for all and a commitment to safety, fairness, and equality of opportunity.

Our Policy is underpinned by believing every individual has the right to:

- Be protected from all forms of physical or mental injury, abuse, neglect, maltreatment, or exploitation.
- Be protected from experiencing discrimination.
- Express their opinions and views, and develop to their fullest potential.

We endeavour to safeguard young people and vulnerable adults by:

- Adhering to our own Policies and Procedures, including employee/volunteer recruitment and training.
- Providing effective management of employees/volunteers through training, supervision, and support.
- Reporting disclosures or concerns to statutory agencies as per this Policy.
- Adopting safeguarding best practices through our **Code of Conduct** as per this Policy.
- Sharing information about our **Safeguarding Policy** with employees, associates, volunteers, parents and guardians, vulnerable adults, and young people, as appropriate.

10.1 Definitions

For the purposes of this Policy, the following definitions apply:

- A **Child** is a person under the age of 18. In addition, it is also a person aged 18-20 who has been in care since the age of 16, or a person aged 18-20 who has a learning disability.
- A **Young Person** is a person who is over 18 but under 21, with no known learning disabilities, no requirements for additional care, and who has not been in care since the age of 16.
- A **Vulnerable Adult** is an adult who receives or needs community care services by reason of 'mental or other disability, age, or illness and who is/may be unable to take care of him/herself, or unable to protect him/herself against significant harm or exploitation'.

In 4C UR Future documentation, the terms child/children and young people/person are used interchangeably and are used generally to refer to anyone under the age of 18.

For the purposes of this Policy, 4C UR Future recognise the following definitions;

- **Employees** are those individuals who are directly employed and paid by the organisation with a Contract of Employment; this may be full-time or part-time, temporary or permanent.
- **Associates** include individuals who are not directly employed by the organisation and may include members, supporters, service providers, contractors, partners, etc. It is important our associates know and respect our Policies and Procedures, and understand their individual responsibilities and fulfil them.
- **Volunteers** are individuals who are engaged in an activity for a non-profit organisation who spend time, unpaid, doing something that aims to benefit the environment or someone (individuals or groups) other than, or in addition to, a close relative. Our volunteers may or may not come into contact with young people and vulnerable adults depending on the nature of their role.
- **Designated Officer** is the individual responsible for making referrals to statutory authorities. They will have undertaken specific and relevant safeguarding training appropriate to the responsibilities of the role, and provide advice and guidance to 4C UR Future in relation to protecting the health, safety, and wellbeing of young people and vulnerable adults who may use the services of the organisation.
- **Safeguarding** is the action taken to promote the welfare of young people and vulnerable adults and protect them from harm, which may include protecting individuals from abuse and maltreatment, preventing harm to an individual's health or development, and using suitable risk assessment and risk management to enable all individuals to have the best outcomes.
- **Harm** is the impact of abuse, neglect, or exploitation on the victim. The result of any act, whether by commission or omission, deliberate or as the result of a lack of knowledge or awareness, which may result in the impairment of physical, intellectual, emotional, or mental health or wellbeing.

- **Abuse** is a single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to another individual, or violates their human or civil rights. Abuse is the misuse of the power and control one person has over another.
- **Neglect** occurs when a person deliberately withholds, or fails to provide, appropriate and adequate care and support, which is required by another person.
- **Exploitation** is the deliberate maltreatment, manipulation, or abuse of power and control over another person; to take advantage of another person or situation, usually but not always for personal gain.
- **Personal characteristics** may include, but are not limited to, age, disability, special educational needs, illness, and mental/physical impairment/frailty, which may increase an individual's exposure to harm.
- **Life circumstances** may include, but are not limited to, isolation, socio-economic factors, and environmental living conditions, which may increase an individual's exposure to harm.

10.2 Young People and Vulnerable Adults in Contact with 4C UR Future

4C UR Future have a wide range of stakeholders and service users, including young people, and potentially vulnerable adults. As part of our work, we deliver in-person and online events targeted to the needs and interests of young people. We also develop and maintain a Careers Portal and Digital Engagement Platform, which is used by a range of stakeholders, including young people.

All of our activities are designed, developed, and delivered with due regard for the safeguarding of young people and vulnerable adults. All of our activities are also designed and delivered in line with relevant data protection legislation and requirements, including the **General Data Protection Regulation** (GDPR), the **Data Protection Act** (DPA), and the **Privacy and Electronic Communications Regulations** (PECR). In addition, we have conducted a **Data Protection Impact Assessment** (DPIA), and our Careers Portal has been designed and developed in line with the **Age Appropriate Design Code** (also known as the Children's Code). For more information see our **Data Protection Policy**, **Privacy Notice**, and **Terms of Use**.

In addition to our stakeholders and service users, we may also work with apprentices, students, and volunteers, who may be employees, volunteers, or complete work experience placements with us.

10.3 Rights of Young People and Vulnerable Adults

We believe young people and vulnerable adults:

- Have the right to work, learn, and develop in a caring and safe environment.
- Have the right to be protected from abuse of all types, and to expect that those in positions of responsibility will do everything possible to foster that right.
- Should be protected from significant harm. This is a primary duty of all 4C UR Future employees and volunteers, regardless of their role and seniority.
- Should be provided with effective protection through the cooperation of agencies and individuals. Everyone is responsible for the safeguarding of children and vulnerable adults.
- Should receive learning, training, and development opportunities that are conducted in an ethical and professional manner by all 4C UR Future employees, volunteers, and associates.

10.4 Responsibilities

4C UR Future recognise we have a legal and moral obligation to protect young people and vulnerable adults who are involved with our organisation, and who could be exposed to harm. We have a duty of care for all young people and vulnerable adults we engage with, to ensure appropriate safeguards are in place to protect them from abuse, neglect, or exploitation, and to ensure the provision of a safe and secure environment.

We have a responsibility to continually review and monitor this **Safeguarding Policy**, seeking further advice and guidance from relevant sources, when necessary. The Managing Director is responsible for approving, implementing, and reviewing this Policy at least every three years, or when new developments in safeguarding occur, or when changes to our activities occur. Our employees, volunteers, associates, stakeholders, and service users will be made aware of our **Safeguarding Policy** and Procedures. A summary of this Policy is available on our website, and employees and volunteers will receive relevant safeguarding training.

Employees and Volunteers

4C UR Future wish to ensure all employees and volunteers are aware of their safeguarding responsibilities, of what constitutes appropriate conduct with young people and vulnerable adults, and of how to make a report should abuse be disclosed or suspected. We also wish to avoid placing employees and volunteers in situations where incorrect allegations may be made. This Policy has been created to ensure clarity. Having safeguards in place not only protects and promotes the welfare of all young people and vulnerable adults, but also improves confidence in, and protects the employees and volunteers of 4C UR Future.

Designated Officer

4C UR Future's Designated Officer is the Managing Director. When alerted to safeguarding concerns, their role is to act promptly and in accordance with the following steps, where appropriate:

- Ensure the individual is in no immediate danger, and seek medical or police assistance, if required.
- Consider whether the concern is a safeguarding issue or not, which may involve some 'checking out' of the information provided, but not straying into the realm of investigation.
- Consult with the Health and Social Care Trust Gateway Team. Where there is doubt or uncertainty, a hypothetical situation can be explored with a Social Worker, who can advise on the best course of action.
- Where a concern is not considered a safeguarding issue, ensure a record of the concern is made and kept securely on file, including the reasons for not referring, and monitor the situation.
- Where a concern is considered a safeguarding issue, make a formal referral to the statutory authorities, and ensure a record of the concern is made and kept securely on file.
- Be available, as required, to the investigation being undertaken by the Gateway Team and/or PSNI.

10.5 Safe Recruitment of Employees and Volunteers

Robust governance arrangements are critical in keeping young people and vulnerable adults safe. 4C UR Future implements a range of governance building blocks, which do not operate in isolation, but are linked to ensure thorough governance throughout the organisation to ensure unsuitable people are prevented from working with young people and vulnerable adults. This includes ensuring:

- Employees have a clear **Job Description** and volunteers have a **Role Description**, both of which outline key skills and abilities required, as well as safeguarding responsibilities.
- Employees and volunteers provide a CV and/or complete an **Application Form**, outlining their previous work experience and/or volunteering experience.
- Employees and volunteers complete a **Safeguarding Declaration Form**, providing information on previous convictions that are not protected, and previous investigations, if any.
- Written references are sought for all employees and volunteers.
- An appropriate **Access NI Check** is conducted, where required.
- Employees and volunteers are effectively managed, supported, and supervised in their roles.
- Employees and volunteers receive induction and safeguarding training, relevant to their role.
- The organisation has a suitable and effective **Safeguarding Policy**, as well as a **Complaints Policy**, **Data Protection Policy**, **Disciplinary Policy**, and a **Whistleblowing Policy**.

When advertising for employees or promoting volunteer opportunities that includes contact with young people or vulnerable adults, we will include a clear safeguarding message that outlines our commitment to safeguarding. If the role requires an Access NI Check, this will be clearly stated.

All employees and volunteers who have contact with young people and vulnerable adults will receive safeguarding training relevant to their role. Training should cover: this Policy and the principles of safeguarding; employee and volunteer safeguarding responsibilities; types of abuse and indicators of abuse; how to respond to disclosures or allegations; how to report safeguarding concerns and who to report them to; and understanding that the duty to report safeguarding concerns overrides confidentiality rules.

10.6 Types of Abuse and Neglect

Young people or vulnerable adults may be abused in a family, institutional, community, or organisational setting, by those known to them or (more rarely) by a stranger. Abusers can be from all sections of society, all professions, all races, and all genders. It is not only adults who abuse children and vulnerable adults – they may be abused by other young people or vulnerable adults.

There are many types of abuse, including:

- **Physical abuse** may include punching, hitting, slapping, kicking, or physically restraining a person against their will. It can also include invading another person's physical space, or making someone feel physically unsafe. Includes deliberate physical injury, or wilful/neglectful failure to prevent physical injury/suffering.
- **Sexual violence and abuse** can be a form of physical abuse, though there are other non-physical elements. Sexual abuse includes rape, forcing or coercing an individual to participate in sexual acts, and non-contact activities such as forcing an individual to look at, or be involved in the production of, sexual images. Sexual abuse includes encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse - including via the internet.
- **Verbal and/or emotional abuse** is the persistent emotional ill-treatment of a person to cause severe adverse effects on their emotional development or wellbeing. It may involve conveying to a person that they are worthless or inadequate, or causing a person to feel frightened or in danger by being constantly shouted at, threatened, or taunted, which may make the person feel nervous or withdrawn. Some level of emotional abuse is involved in all types of ill-treatment. The effects of verbal/emotional abuse can be more difficult to recognise. However, they can be equally as detrimental to an individual as physical abuse and can take longer to heal.
- **Mental and/or psychological abuse** happens when someone, through a series of actions or words, wears away at another individual's sense of mental wellbeing and health. It often involves making the victim doubt their own sanity (sometimes referred to as 'gaslighting'). The result of this, especially over a sustained period, is that the victim depends on the abuser more because they don't trust their own judgment. They also hesitate to tell anyone about the abuse for fear they will not be believed.
- **Financial and/or economic abuse** may include controlling all budgets and finances in the household and not letting the victim have access to their own bank account or spending money. It may also include opening lines of credit in the victim's name and running up debts. It could include not letting the victim have a job to earn their own money. This type of abuse is often a key reason why someone is unable to leave an abusive relationship.
- **Institutional abuse** occurs within institutions and is often systemic and part of the organisation's ingrained culture. It may include inappropriate restraint and the misuse of medication, such as overusing medication or under medicating someone. Often external Whistleblowers report the abuse.
- **Neglect** is when basic physical and psychological needs are not met, likely to result in the serious impairment of a person's health or development. Indicators for this type of abuse could be withdrawal from services, for example in the health visitor or school nurse service, or poor personal care and hygiene, where an individual shows no sign of personal grooming having taken place for a long period of time. It may also be indicated by conditions being left untreated, such as prolonged head lice, malnutrition, or dehydration.
- **Domestic violence and abuse** include threatening behaviour, violence, or abuse (psychological, physical, verbal, sexual, financial, or emotional) inflicted on one person by another where they are, or have been, intimate partners or a family member, irrespective of gender or sexual orientation.
- **Human trafficking** involves the acquisition and movement of people by improper means, such as force, threat, or deception, for the purposes of exploiting them. It can take many forms, such as domestic servitude, forced criminality, forced labour, sexual exploitation, and organ harvesting.
- **Hate crime and/or discriminatory abuse** happens when abusers use aspects of a victim's protected characteristics to inflict suffering, or as a means of control. For example, refusing to let someone observe their cultural or faith-based dietary or dress customs, using racial slurs, threatening to 'out' someone as LGBTQIA+, or isolating someone who doesn't speak the dominant language. A range of legislation exists to protect individuals from discrimination. The legislation refers to 'protected characteristics', which include age, disability, gender or gender reassignment, marital or civil partnership status, pregnancy and maternity, race, religion or belief, and sex or sexual orientation.

10.7 Indicators of Abuse

There are a number of ways you could be alerted that a young person or vulnerable adult is suffering abuse, neglect, or exploitation. The following list is not exhaustive, and while the presence of one or more of the following indicators is not necessarily evidence of abuse, concerns should be raised with the Designated Officer and/or statutory authorities as soon as possible.

A young person or vulnerable adult may:

- Make a disclosure to you that they are being abused.
- Disclose to someone else that they are being abused, who passes this information on to you, or a third party may strongly believe a young person or vulnerable adult is being abused and inform you.
- Show signs of physical injury for which there is no satisfactory explanation, such as bruising, cuts, or burns, particularly if located on a body part not normally prone to such injuries.
- Show signs of behavioural change for which there is no satisfactory explanation, such as becoming emotional, withdrawn, or displaying sudden outbursts of anger.
- Display inappropriate sexual awareness or engage in sexually explicit behaviour.
- Display weight loss for no apparent reason, and/or overeating or loss of appetite.
- Have an unkempt or unhygienic appearance and/or become increasingly dirty.

10.8 Responding to Disclosures

In the event a young person or vulnerable adult discloses or indicates that they are being abused, you should be aware of the importance of: listening, accepting, reassuring, explaining, acting immediately, recording, and getting support. There is not one set of rules to follow in responding to disclosures. However, you should be guided by the following points:

DO

- React calmly, so as not to frighten the young person or vulnerable adult.
- Give the young person or vulnerable adult time to say what they want, and accept what they say.
- Reassure them that they have done the right thing in telling someone.
- Record, in writing, what was said as soon as possible, and in the individual's own words.
- Make a report to the Designated Officer and/or statutory authorities as soon as possible.

DO NOT

- Panic, or allow shock or distaste to show.
- Ask leading questions or enquire into details of the abuse.
- Agree to keep secrets, or promise confidentiality - you have a legal obligation to report alleged abuse.
- Make the individual repeat their disclosure unnecessarily.
- Approach or inform the alleged abuser.
- Delay in making a record or reporting the disclosure.

It is not the responsibility of an employee or volunteer to decide whether or not abuse is taking place or to conduct an investigation. However, it is the responsibility of employees and volunteers to report disclosures or suspicions to the Designated Officer and/or the statutory agencies.

10.9 Safeguarding and Confidentiality

Under normal circumstances, confidentiality is extremely important. However, where a disclosure has taken place, or there is a legitimate concern for the safety or wellbeing of a young person or vulnerable adult, employees and volunteers have a legal and moral duty to make a report. While this does break the rules around confidentiality, within the law, abuse allegations and concerns outweigh the right to privacy.

10.10 Procedure for Reporting Alleged Abuse and Safeguarding Concerns

There are two agencies with the statutory authority to undertake a Safeguarding Investigation. These are the Social Services and the Police Service of Northern Ireland (PSNI). Employees and volunteers are not responsible for conducting investigations or providing a remedial response to abuse. Inappropriate intervention can have a negative impact on the outcome of a Safeguarding Investigation. For example, if evidence suggests an organisation other than the statutory authorities attempted to undertake an investigation (knowingly or unknowingly), it could seriously undermine a successful safeguarding action.

4C UR Future employees and volunteers have a responsibility to be alert to potential indicators of abuse, and a legal and moral duty to report any alleged abuse or safeguarding concerns.

Suspected or alleged abuse and/or safeguarding concerns should be reported to the Designated Officer, who is the Managing Director. Alternatively, suspected or alleged abuse and/or safeguarding concerns can be reported directly to the statutory authorities. Regardless of the method of reporting, it is vital that concerns are reported as soon as possible, as the consequences of not reporting, or delaying reporting, could be very serious for the young person or vulnerable adult.

It is an offence to fail to make a report if you know or believe abuse is being committed, or if you have information or suspicions that a young person or vulnerable adult is at risk of significant harm.

All disclosures, allegations, and concerns should be recorded, in writing, on a **Safeguarding Report Form**. Where you do not have access to a Safeguarding Report Form, you should record: the date, time, and nature of the disclosure, allegation, or concern; the alleged or involved parties; relevant parent/guardian details; anything the individual tells you in their own words; any indicators of abuse disclosed and/or witnessed; and details of the situation or activity that preceded the disclosure/suspicion.

4C UR Future employees and volunteers must never prevent, or delay, making a report if they believe a young person or vulnerable adult is at risk of significant harm. The welfare of the young person or vulnerable adult is of absolute importance, and their best interests must override any other considerations.

HSC Trust Adult Safeguarding Contact Details

Belfast – 02895 041744
Northern – 02825 635512
Western – 02871 611366
South Eastern – 02892 501227
Southern – 02837 412015

HSC Trust Child Protection Contact Details

Belfast – 02890 507000
Northern – 0300 1234 333
Western – 02871 314090
South Eastern – 0300 1000 300
Southern – 0800 7837 745

Out of hours concerns relating to children and vulnerable adults should be referred, without delay, to the PSNI and/or the Regional Emergency Social Work Service on 028 9504 9999.

10.11 Information Sharing for the Purpose of Safeguarding

Effective safeguarding depends on the timely sharing of information to those who need it at the right time. Employees and volunteers may need to share information about young people or vulnerable adults for a number of reasons, including, for example: making a report of disclosed abuse and/or a safeguarding concern to the Designated Officer; making a referral to statutory authorities; an authorised person has asked for information; a statutory duty or court order requires information to be shared.

Information sharing is a form of data processing that is covered by the **General Data Protection Regulation** and the **Data Protection Act**. You must always have a clear and legitimate purpose for sharing personal information, and keep a record of the reasons why you are sharing the information. Where possible, consent should be obtained to share information about a young person or vulnerable adult. However, in the case of making a report or referral regarding a disclosure of abuse, suspected abuse, or a safeguarding concern, information can be shared without consent.

When sharing information for the purposes of safeguarding, consideration should be given to:

- Prioritising the safety and welfare of the young person or vulnerable adult concerned.
- Ensuring the information is shared quickly and securely.
- Using language that is clear and concise, ensuring the information you share is accurate, and distinguish between information that is factual and what is based on opinion.

10.12 Safeguarding Allegations Against Employees and Volunteers

In the event of a safeguarding allegation against an employee or volunteer, our approach to reporting remains consistent with 4.10. While we have a dual responsibility to both the young person or vulnerable adult, and the employee or volunteer, the safety and wellbeing of the alleged victim is always the priority.

Details of the allegation will be recorded fully, in writing, by the Designated Officer and passed to the CEO, who will direct the internal investigation in relation to the employee or volunteer. The Designated Officer will make a referral to the statutory authorities and will be the point of contact for external investigations.

Regardless of whether the statutory authorities determine an external investigation is required, 4C UR Future will conduct an internal investigation, recording all relevant information, and the situation may be monitored so a future referral can be made if the situation changes.

Internal investigations should not commence until external investigations have been concluded, particularly if a criminal investigation is being conducted by the PSNI.

In the case of an allegation, the CEO should inform the employee or volunteer that an allegation has been made against them, and they should be provided with an opportunity to respond to the allegation. Their response should be fully recorded, in writing.

As a matter of urgency, we will take all protective measures necessary to ensure no young person or vulnerable adult is exposed to unnecessary risk. This may include transferring the employee or volunteer to another role with no contact with young people or vulnerable adults, or suspension 'without prejudice', until the result of any internal and/or external investigation. Protective measures should not unreasonably penalise the employee or volunteer, unless necessary to protect a young person or vulnerable adult.

Every effort should be made to maintain the confidentiality of all parties while an allegation or concern is being investigated and there will be no assumption of guilt during investigations until they are concluded.

Actions Upon the Outcome of Investigations

- If, following internal and/or external investigation, the **allegation of harm/risk of harm is substantiated and the individual is dismissed**, in accordance with the Disciplinary Policy, the organisation has a statutory duty to make a referral to the Disclosing and Barring Service (DBS). Referral will be made at the point the allegation is substantiated and the decision has been made to dismiss the employee or volunteer from their role. This may happen at any stage during the disciplinary procedure, and not necessarily at conclusion. If the employee or volunteer retires or resigns at any point during the investigation or disciplinary process, the investigation must still be concluded, and a referral made to DBS.
- If, following internal and/or external investigation, the **allegation of harm/risk of harm is substantiated and the individual is reinstated**, referral to DBS is not required. It is possible that the investigation finds the allegation is substantiated, but the circumstances are such that the individual can be reinstated to their role subject to appropriate disciplinary action, and the provision of appropriate training, support, and supervision.
- If, following internal and/or external investigation, the **allegation of harm/risk of harm is unsubstantiated but there are ongoing concerns** regarding the conduct of the employee or volunteer, the organisation may conclude the individual can be reinstated with appropriate training, support, and/or supervision.
- If, following internal and/or external investigation, the **allegation of harm/risk of harm is unsubstantiated and there are no ongoing concerns**, the employee or volunteer may be reinstated to their role with support to reintegrate back into the organisation. Appropriate training and supervision may be necessary depending on the nature of the allegation and the findings of the investigation.

10.13 Safeguarding Allegations Against a Young Person or Vulnerable Adult

The risk of harm, or actual harm, to a young person or vulnerable adult may be perpetrated by another young person or vulnerable adult. This is sometimes referred to as 'peer-on-peer abuse'. It is important that victims are protected and supported, and that alleged perpetrators receive the appropriate help.

There are many ways a young person or vulnerable adult may be abusive towards others, and the individual may not realise their behaviour is abusive. Abusive behaviours may include: bullying or cyberbullying, emotional abuse, physical abuse, 'sexting' or sexual abuse.

Allegations or concerns may be raised in a number of ways, including:

- A young person, vulnerable adult, or adult alleging abuse by a young person or vulnerable adult.
- A young person or vulnerable adult may tell you they're uncomfortable with another young person or vulnerable adult's behaviour.
- An employee or volunteer observing concerning behaviour and reporting it to the Designated Officer.
- A young person or vulnerable adult disclosing they have harmed someone else, or intend to do so.

Where an employee or volunteer notices a young person or vulnerable adult behaving inappropriately, you should talk to them about it immediately, making reference to 4C UR Future's Code of Conduct. Inappropriate behaviour should be managed appropriately but does not necessarily constitute a reportable safeguarding allegation or concern.

Inappropriate behaviour becomes a safeguarding concern when:

- The behaviour involves sexual or physical assault.
- The individual who has experienced the behaviour has suffered significant harm.
- The behaviour forms a pattern of concerning behaviour by the alleged perpetrator.
- You are concerned the individual carrying out the abuse may be doing so because they have experienced abuse or significant harm themselves.
- There is a significant difference of power between the individual displaying abusive behaviour and the individual being abused, for example when: there is an age difference of more than two years; or there is a difference in terms of size or level of ability.

Inappropriate behaviour or allegations that constitute abuse by a young person or vulnerable adult should be reported to the Designated Officer, and referred to statutory authorities if required, as described in 4.10.

10.14 Safeguarding and the Storage and Retention of Records

Any information gathered or records created for the purposes of safeguarding young people and vulnerable adults will be stored and retained in line with our **Data Protection Policy** and treated confidentially. Records will be stored separately from any other general records concerning the individual and will have restricted access. The Government recommends safeguarding files relating to young people and vulnerable adults are kept until the **individual's 30th birthday**, or for a period of **10 years**, whichever is longer.

If safeguarding information or records are created about employees or volunteers, they will be stored and retained until the individual reaches their **normal retirement age**, or for a period of **10 years**, whichever is longer. Safeguarding information or records created about employees or volunteers will be stored for the same retention period regardless of whether allegations are substantiated or unsubstantiated. In the event the allegation is determined to be malicious, records will be destroyed immediately.

There are some situations and extenuating circumstances that may require a longer retention period. For example, if the records need to be maintained for the purposes of research, if the records are relevant to ongoing legal action, if the records relate to a young person or vulnerable adult in the care of the state, or if the records are archived for historical purposes. We will seek professional advice and guidance on the retention of records, where required.

Certificates of Access NI Checks are not stored. Instead, a confidential record is kept of: the date the check was completed; the level and type of check; and the reference number of the certificate. If there is a dispute regarding the results of a check, a copy of the certificate may be kept for a period no longer than **6 months**.

When the retention period is finished, hardcopy safeguarding records should be incinerated or shredded and digital safeguarding records should be securely deleted and/or destroyed.

10.15 Employee and Volunteer Safeguarding and Behaviour Code of Conduct

We aim to provide a safe and secure environment for all young people and vulnerable adults. All employees and volunteers are acting in a position of authority and responsibility, and are often seen by young people and vulnerable adults as role models. Therefore, all employees and volunteers must familiarise themselves with this Policy, Procedure, and Code of Conduct, and act in accordance with it at all times.

All employees and volunteers should:

- Prioritise the safety and welfare of young people and vulnerable adults, acting within the law at all times.
- Actively contribute to an organisational culture where inappropriate behaviour is not tolerated; setting an example of the good behaviour others should follow, and challenging unacceptable behaviour.
- Report disclosures, allegations, and any concerns to the Designated Officer as soon as possible.
- Treat all young people and vulnerable adults fairly, and without prejudice or discrimination.
- Value young people and vulnerable adults as individuals, and respect differences in gender, sexual orientation, culture, race, ethnicity, ability, and religious beliefs.
- Encourage and praise achievement and effort, and avoid favouritism.
- Involve young people and vulnerable adults in decision making, where appropriate.
- Ensure that, whenever possible, there is more than one adult present during activities with young people and vulnerable adults, or at least that you are within sight or hearing of other adults.
- Promote relationships that are based on openness, honesty, trust, and respect.
- Exercise caution when discussing sensitive issues with young people or vulnerable adults.
- Only provide personal care or assistance in an emergency and ensure there is more than one adult present, if possible.

All employees and volunteers should not:

- Allow disclosures, allegations, or concerns to go unreported.
- Smoke, consume alcohol, or use illegal substances in the presence of young people or vulnerable adults.
- Transport young people or vulnerable adults alone by vehicle.
- Engage in any unnecessary physical contact, or engage in or allow any sexually provocative activities.
- Make, or permit, insensitive, derogatory, discriminating, or sexually suggestive comments or gestures to be made to, or about, young people or vulnerable adults.
- Act in any way that could be perceived as threatening or intrusive.
- Patronise or belittle young people or vulnerable adults.
- Meet with young people or vulnerable adults outside of organised or formal interaction.
- Give out personal information, share personal email addresses or phone numbers, or create social networking connections with a young person or vulnerable adult outside of an organisational context.

Employees and volunteers should report a breach of this Code to the Designated Officer. Breaches of this Code, or other inappropriate behaviour, will render employees and volunteers subject to our Disciplinary Procedure, the result of which may include disciplinary action up to and including dismissal. In certain cases, we may also make a referral to statutory agencies.

10.16 Young People and Vulnerable Adult Behaviour Code of Conduct

This Code of Conduct aims to ensure everyone who participates in 4C UR Future activities and services knows what behaviour is expected of them, and helps to ensure everyone feels safe, respected, and valued. Everyone who participates in our activities and services will be made aware of this Code of Conduct, and of the consequences of inappropriate behaviour. We expect young people and vulnerable adults who take part in our activities and services to display appropriate behaviour at all times. This includes behaviour that takes place outside of our organisation, and behaviour both online and off-line.

This Code of Conduct aims to:

- Identify acceptable and unacceptable behaviour.
- Encourage cooperation, honesty, fairness, and respect for all.
- Create an environment in which your self-esteem, self-respect, and self-confidence can grow.
- Encourage you to recognise and respect the rights of others.
- Encourage you to take responsibility for your own behaviours.
- Make it clear what could happen if you choose not to follow the Code of Conduct.

Young people and vulnerable adults should:

- Follow instructions given to them by employees and volunteers and cooperate with others.
- Listen to others and give everyone a chance to have their say.
- Treat everyone with respect and not engage in any bullying or physical horseplay.
- Follow this Code of Conduct and any other rules specific to activities or services, including the law.

- Report any worries or concerns you have about others' behaviour to an adult.
- Participate, join in, and have fun.

Young people and vulnerable adults should not:

- Ignore instructions given to them by employees and volunteers, especially in relation to safety.
- Be disrespectful of others, or engage in any kind of bullying or abusive behaviour, or behave in a way that could be perceived as being threatening or intimidating.

If you behave in a way that doesn't follow our Code of Conduct, our employees or volunteers will remind you about it and ask that you comply with it. This will give you the opportunity to change your behaviour. If you continue to behave in a way that doesn't follow our Code of Conduct, or if your behaviour is more serious, we may inform your parent and/or guardian, and your school and/or teacher, and you may be removed from participating in 4C UR Future activities or services.

10.17 Safeguarding and Images of Young People and Vulnerable Adults

Sharing photographs and videos of our activities help us record our events and impact, celebrate the successes and achievements of young people and vulnerable adults, and raise awareness of our organisation. However, we recognise that the safety and welfare of young people and vulnerable adults is paramount. We aim to ensure that we operate within the law and in line with our own values at all times, including when creating, using, and sharing images of young people and vulnerable adults.

We endeavour to:

- Inform parents and/or guardians of how images will be taken, used, and stored.
- Obtain consent from a parent and/or guardian before taking, using, and storing images.
- Not name young people or vulnerable adults in published material, where possible.
- Use images that positively reflect an individuals' involvement in our activities.
- Remove from publication, 'take down', and/or securely delete images when it is brought to our attention by a parent/guardian of the individual/s featured that they do not wish for the image to be shared.
- Make clear that if consent is obtained and then withdrawn, it may not be possible to delete images that have already been shared or published.
- Ensure that where consent is not obtained, the individual concerned is discreetly identifiable, and will not be excluded from participating in any activities.

4C UR Future employees and volunteers must abide by this Policy, which covers images taken, created, used, and stored by the organisation for its own purposes. We may hire a professional to take images at our events. These individuals will be supervised at all times, and will be informed of any individuals for whom we have not obtained consent. Third parties such as local journalists, member companies, and supporting organisations may wish to take, use, and store images of our activities for wider use. In this case, they must obtain permission from 4C UR Future in advance and images must be approved for use prior to release.

We will store images of young people and vulnerable adults securely, in line with our **Data Protection Policy**.

10.18 Bullying

Bullying is when an individual or group seeks to harm or intimidate another individual or group. Bullying can involve people of any age, and can happen anywhere - at home, school, or using online platforms and technologies (also called 'cyberbullying'). Due to the significant increase in use of digital technology in recent years, this now means bullying can happen at any time, and it can be incessant.

Bullying can involve a wide range of behaviours, which are often combined, such as: name-calling, taunting, saying mean or hurtful things about an individual or their family, physical violence including hitting, pushing, and threatening behaviour, being undermined or excluded, sending abusive or menacing messages (sometimes called 'trolling'), creating and sharing embarrassing or malicious images and/or videos, creating 'hate' sites or profiles, and creating fake online accounts or hacking into someone's account to steal online identities and/or embarrass someone by reading and sharing their private messages and/or behaving inappropriately using their identity.

Bullying is often treated differently and less seriously than abuse. However, bullying behaviours often constitute behaviours that could legally be defined as abuse, harassment, or discrimination, especially if the bullying is based on an individual's gender identity, sexuality, disability, race, or religious belief.

We seek to prevent bullying by:

- Developing a Code of Conduct that everyone involved in our organisation is expected to uphold.
- Providing training to all employees and volunteers on what constitutes bullying, how to identify and respond to bullying behaviours, how to report bullying, and the potential consequences for bullying.
- Recognising and respecting the value of diversity, and celebrating difference.

4C UR Future have a zero-tolerance approach to bullying, including bullying behaviour displayed by any individual, of any age, towards young people, vulnerable adults, employees, or volunteers. Allegations or suspicions of bullying should be taken seriously, as even microaggressions can have significant negative consequences on an individual's physical and mental health and wellbeing. The emotional effects of being bullied can include: sadness, depression, and anxiety; low self-esteem and self-worth; social isolation; self-harm; and suicidal ideation.

There are many reasons why individuals may participate in bullying behaviour, including:

- Peer pressure and/or seeking the approval of others.
- Wanting to feel powerful over another person with a perceived disadvantage, particularly if they are being bullied themselves.
- Being worried, unhappy, or upset about something and 'acting out'.
- Lack of social skills and/or empathy, and potentially not understanding the consequences of their actions.

Indications an individual is experiencing bullying may include:

- A direct disclosure or allegation of bullying by the person being bullied.
- An indirect disclosure or allegation of bullying by someone who has witnessed the bullying.
- Being reluctant to attend school/events/activities where certain individuals may be present.
- Displaying distressed or anxious behaviours, or lacking confidence and being withdrawn.
- Having problems eating, sleeping, or engaging in activities that are usually enjoyed.
- Having unexplained injuries.
- Changes in appearance, performance, and/or behaviour.

Responding to Bullying Allegations and/or Suspicions

Bullying allegations and/or suspicions will be treated very seriously. All individuals are encouraged to report bullying allegations and/or suspicions to the Designated Officer.

Bullying allegations and/or suspicions regarding young people and vulnerable adults will be appropriately investigated, and if substantiated may lead to the individual/s engaging in bullying behaviour from being removed from participating in 4C UR Future activities or services, in line with our Code of Conduct. Parents and/or guardians, and schools and/or teachers may also be informed. If the bullying behaviour constitutes abuse and/or there is the potential for significant harm to the individual being bullied, the incident will be reported to the statutory authorities.

Bullying allegations and/or suspicions regarding employees and volunteers will be appropriately investigated, and if substantiated may lead to disciplinary action, up to and including dismissal. If the bullying behaviour constitutes an offence, the relevant authorities may also be informed. If the bullying behaviour is directed towards young people and/or vulnerable adults, and constitutes abuse, and/or there is the potential for significant harm to the individual being bullied, the incident will be reported to the statutory authorities.

10.19 References and Relevant Legislation

This Safeguarding Policy operates in conjunction with all other relevant Company Policies and Procedures. Policies and Procedures that may be considered with this include, but are not limited to, the: Health and Safety Policy, Equal Opportunities Policy, Disciplinary Policy and Procedures, Grievance Policy and Procedures, Alcohol and Drugs Policy, and the IT and Communication Systems Policy.

This Policy was created using information from the following resources:

[United Nations Convention of the Rights of the Child \(UNCRC\) | Keeping Children Safe – Our Duty to Care | Section 75 of the Northern Ireland Act | Safeguarding Vulnerable Groups \(NI\) Order | Safeguarding Board Act \(NI\) | Cooperating to Safeguard Children and Young People in Northern Ireland | Adult Safeguarding Policy, Prevention, and Protection in Partnership \(2015\) | Protection of Children and Vulnerable Adults \(NI\) Order | NSPCC Learning Resources | Children \(NI\) Order](#)