

ICAS Foundation
Safeguarding & Wellbeing Policy

CONTENTS

Clause	Page Number
1. Purpose & Scope	1
2. Our Commitment	1
3. Definitions	2
4. Roles and Responsibilities	3
5. Wellbeing and Support	3
6. Guidance on General and Online Conduct	4
7. Recognising and Reporting Concerns	5
8. Allegations against our People	7

ICAS FOUNDATION

SAFEGUARDING & WELLBEING POLICY

1. Purpose & Scope

- 1.1 The purpose of the ICAS Foundation Safeguarding & Wellbeing policy is:
- 1.1.1 To define ICAS Foundation Safeguarding & Wellbeing principles and procedures.
 - 1.1.2 To describe the ICAS Foundation commitment to the planning and procedures necessary to protect children and adults at risk from potential harm or threat.
- 1.2 This policy applies to anyone involved with the ICAS Foundation, including the board of trustees, paid staff, contractors, mentors or other volunteers (our “People”).
- 1.3 This policy was written in conjunction with legislation, policy and guidance concerning the protection of children, young people and adults at risk in Scotland (“Vulnerable Groups”). However, although this policy focuses on Vulnerable Groups, we recognise that:
- 1.3.1 as a charity we have a wider responsibility to protect our People and those benefiting from our work in general; and
 - 1.3.2 that many of the people we work with, whilst not falling within the definition of Vulnerable Group, are often young and vulnerable in the more general sense and are likely to experience particular challenges in their lives.
- The general principles of this policy should therefore be applied to everyone we work with even if they are not in a Vulnerable Group.
- 1.4 This policy should be read alongside our other organisational policies, procedures, guidance and other related documents, including our Fundraising Policy (Section 5 of which has specific guidance on fundraising interactions with Vulnerable Groups), ICAS Foundation Complaints Policy, our Mentor Handbook, Welcome Guide for New Students, Student Funding Policy, Change-in-Student Circumstances Policy, ICAS Foundation Additional Support Fund Guidance, Student Funding Policy, ICAS Disciplinary Policy and procedure, Online Communications Policy (when implemented).

2. Our Commitment

Our Commitment

- 2.1 The ICAS Foundation is committed to:
- 2.1.1 creating a safe and welcoming environment, where everyone is respected and valued;
 - 2.1.2 ensuring that the organisation is run in a way that actively prevents harm, harassment, bullying, abuse and neglect;
 - 2.1.3 being ready to respond safely & well if there is a problem; and
 - 2.1.4 safeguarding all those we work with and our People generally.
- 2.2 We believe everyone should have an equal right to protection from abuse, regardless of age, culture, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation, and consider the welfare of our People as paramount.

Our Approach to our Work

- 2.3 We will seek to keep all those we work with (including Vulnerable Groups) safe by:
- 2.3.1 Valuing, listening to and respecting them.
 - 2.3.2 Adopting wellbeing, safeguarding, and child protection best practice through our policies, and procedures.
 - 2.3.3 Ensuring our People are members of the Protection of Vulnerable Groups (Scotland) scheme prior to working with Vulnerable Groups.
 - 2.3.4 Providing effective management for our People through supervision, support, training and quality assurance measures, including compulsory induction and safeguarding training for all new staff and volunteers, which will be regularly repeated, so that our People know about and follow our policies and procedures.

- 2.3.5 Ensuring all appropriate checks are made when recruiting and selecting our People, including an interview and checking of references where the person is not previously known to us.
- 2.3.6 Recording, storing and using information professionally and securely, in line with data protection legislation and guidance.
- 2.3.7 Making sure that our People and those we work with (including Vulnerable Groups), know where to go for help if they have a concern or complaint.
- 2.3.8 Using procedures to share concerns and relevant information with agencies or organisations who need to know, and involving those we work with (including Vulnerable Groups) appropriately.
- 2.3.9 Using our procedures to manage any allegations against our People appropriately.
- 2.3.10 Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- 2.3.11 Ensuring that we provide a safe physical environment for, those we work with (including Vulnerable Groups) and our People, by applying health and safety measures in accordance with the law and regulatory guidance.
- 2.3.12 Building a safeguarding culture where our People and those we work with (including Vulnerable Groups), treat each other with respect and are comfortable about sharing concerns.
- 2.3.13 Establishing clear procedures for the reporting and handling of allegations of abuse against our People.
- 2.3.14 Reviewing our policy and good practice annually.

Our Expectations of our People

- 2.4 Our People have a responsibility to ensure that all those we work with are protected from harm and will be expected to adhere to the following principles.
- 2.5 You must:
 - 2.5.1 ensure the welfare of those we work with always comes first regardless of the aims of activity being carried out
 - 2.5.2 recognise the position of trust your involvement with those we work with places you in;
 - 2.5.3 not abuse that position of trust;
 - 2.5.4 behave in a way that is safe and appropriate at all times;
 - 2.5.5 comply with our policies in place from time to time (including in the case of mentors the expectations set out in the Mentor Handbook) at all times;
 - 2.5.6 keep relationships professional, avoiding personal/social contact;
 - 2.5.7 ensure your dress and appearance are appropriate to your role, i.e. dress decently, safely and appropriately for the tasks you undertake and avoid clothing that is likely to be viewed as offensive (e.g. containing political or otherwise contentious slogans including sexually offensive slogans)
 - 2.5.8 treat all individuals equally and with dignity regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation; and
 - 2.5.9 report any suspicion, disclosure, or allegation of abuse in accordance with this Safeguarding & Wellbeing Policy

3. Definitions

- 3.1 **Adult at risk:** anyone over 18 who is unable to safeguard their own well-being, property, rights or other interests; that they are at risk of harm; and that because they are affected by disability, mental disorder, illness or physical or mental infirmity they are more vulnerable to being harmed than adults who are not so affected.
- 3.2 **Child Anyone** under the age of 18.

- 3.3 **Safeguarding** The preventive and precautionary approach to the planning and procedures necessary to protect children and adults at risk from potential harm.

4. Roles and Responsibilities

- 4.1 **Designated Safeguarding Officer (DSO):** The DSO is responsible for the implementation of the Safeguarding and Wellbeing Policy. They are also responsible for policy and process review, maintaining up-to-date knowledge of current safeguarding practice and issues, ensuring sufficient training for our People, ensuring records are maintained of all concerns raised, and creating and maintaining a network of relevant support and referral agencies. The DSO assesses safeguarding cases and makes a final decision on whether an external referral is required. Where appropriate the DSO will signpost to those we work with sources of support available from the ICAS Foundation such as the Additional Support Fund.
- 4.2 **Deputy Designated Safeguarding Officer (DDSO):** the DDSO will deputise for the DSO in their absence and support as required with the implementation of the Policy, training of our People and other responsibilities.
- 4.3 **The DSO is**
Amy Drysdale
Head of Programmes and Volunteering
Telephone:- 0131 347 0121
Email:- adrysdale@icasfoundation.org.uk
- 4.4 **The DDSO is**
Chris O'Sullivan
Head of Income and Engagement
Telephone:- 07747 615118
Email: cosullivan@icasfoundation.org.uk
- 4.5 In the case of an emergency, if neither the DSO nor the DDSO can be contacted please contact enquiries@icasfoundation.org.uk

5. Wellbeing and Support

Our Approach

- 5.1 We are committed to providing an environment that promotes and supports a positive state of physical and mental health and wellbeing for our People and those we work with. The policy also aims to ensure those who are experiencing health issues are supported and treated with respect, confidentiality and without discrimination.
- 5.2 We will:
- 5.2.1 Promote a culture of open communication. We want our People and those that we work with to feel confident that they can openly discuss any wellbeing concerns without fear of stigma or discrimination. We will provide both formal and informal means for raising such concerns.
 - 5.2.2 Take account of stress and mental wellbeing when planning and allocating our work. We will provide opportunities for our People to discuss these through relevant supervision processes.
 - 5.2.3 Implement policies and procedures to address factors that can cause stress, or add to personal stress, in particular so that we can:
 - (i) provide an environment free from harassment, bullying and victimisation; and
 - (ii) address inappropriate behaviour.

Mental health issues

- 5.3 We recognise that there may be occasions when, for whatever reason, those that we work with or our People feel that their mental health is suffering. Anyone who feels that they are suffering from mental health issues should:

- 5.3.1 discuss this confidentially in the first instance with:
- (i) In the case of those that we work with, their mentor (if applicable), the Head of Programmes and Volunteering and /or the DSO or, in their absence, the DDSO
 - (ii) in the case of volunteers, with the Head of Programmes and Volunteering, or, in their absence, the DSO / DDSO
 - (iii) in the case of staff, with their line manager,
 - (iv) in all other cases, discuss this with the DSO or, in their absence, the DDSO; and
- 5.3.2 Making use of the support services referred to in this policy.

Sources of Support

Support for those we work with

- 5.4 We recommend the following service to assist those we work with (including Vulnerable Groups):
- 5.4.1 University or college student support services, including student support, wellbeing or counselling services as appropriate to the student's needs.

Support for our People

- 5.5 We have the following services in place to assist our People:
- 5.5.1 For employees, the Employee Assistance Programme and the Thrive Mental Health and Wellbeing app.
 - 5.5.2 For ICAS Chartered Accountants, the ICAS Wellbeing Helpline.
 - 5.5.3 For ICAS students, the student assistance programme, which includes a counselling helpline.
 - 5.5.4 For anyone else, or in relation to a serious situation, contact the DSO to discuss.

6. Guidance on General and Online Conduct

General Guidance

- 6.1 Our People should:
- 6.1.1 Arrange a neutral and public venue such as a café when meeting those we work with;
 - 6.1.2 Avoid leaving those we work with unsupported when invited by us to attend external events;
 - 6.1.3 Ensure that those we work with get home safely when invited by us to attend external events;
 - 6.1.4 Ensure that when those we work with engage in promotional activity for our work that the principles of this policy are applied, including ensuring the individual is fully aware of what the promotional activity will mean for them personally and that they are comfortable for details (which may be very personal to them) to be publicised;
 - 6.1.5 Avoid unnecessary physical contact; and
 - 6.1.6 Avoid using or allowing others to use over-familiar or sexually suggestive comments, inappropriate language or behaviour.
- 6.2 Further guidance on the responsibilities of mentors can be found in the Mentor Handbook and mentors should ensure that they are familiar with this Guide.

Online Communications

- 6.3 We recognise that building a professional online profile can be an important part of the personal and professional development of those we work with. Where those we work with request to connect on LinkedIn, our People may choose to accept such requests, if they are comfortable doing so depending on their role and previous contact with the individual. (There is no obligation for anyone to accept a connection request on LinkedIn.)

- 6.4 No official ICAS Foundation communications should take place via social media direct message, and those we work with who reach out to our People via direct message should be directed to the Foundation's enquiries email address so that communications are appropriately recorded.

7. Recognising and Reporting Concerns

Concerns about safety and welfare

- 7.1 If anyone we work with, or one of our People, is considered by others to be at serious risk of self-harm, or of harming others, action must be taken straight away as follows:
- 7.2 In the event of an emergency, including a threat to life, call the emergency services on 999. This applies to those we work with and our People.
- 7.3 Concerns that arise with respect to the safety and welfare of a student should be discussed immediately with the DSO or DDSO.
- 7.4 In the case of an emergency, every effort will be made to contact any person nominated by the individual concerned as an emergency contact. The wellbeing of those we work with, our People and those around them will at all times be our first concern.

Recognising harm

- 7.5 We acknowledge that our People are unlikely to be experienced in recognising situations where harm or abuse may have occurred. It is not the responsibility of our People to decide that abuse is occurring, but it is their responsibility to follow through on any concerns they may have regarding the welfare of a student.
- 7.6 The mentoring logs are an important tool in our Safeguarding practice and provide a useful source of information about a student's experience. It is therefore essential that good logs are kept and returned to us on a regular basis as set out in the Mentor Handbook.

Recognising Harm in Children and Young People

- 7.7 While many concepts of harm will be the same for children and young people as for vulnerable adults, the legal definitions can be slightly different, as can the nature of harm, occurrences of harm and signs. The below paragraphs contain a summary of what constitutes child abuse; a full NSPCC guide is available at <https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>.
- 7.8 Harm in children and young people can commonly (but not exclusively) take the following forms:
- 7.8.1 Physical: for example when a child or young person is deliberately hurt by someone else;
- 7.8.2 Sexual: for example when a child or young person is being sexually harassed or assaulted;
- 7.8.3 Psychological: for example when a child or young person is being bullied;
- 7.8.4 Neglect: for example when a child or young person is not dressing, washing or eating properly or is not being adequately cared for.
- 7.9 Recognising harm can be challenging in itself. Harm may present in very different ways depending on the type of harm, and individual circumstances. The following are some common (but not all) possible indicators of potential harm in children and young people:
- 7.9.1 Being afraid of particular places or making excuses to avoid particular people;
- 7.9.2 Having angry outbursts or behaving aggressively towards others;
- 7.9.3 Becoming withdrawn or appearing anxious, clingy or depressed;
- 7.9.4 Self-harming or having thoughts about suicide;
- 7.9.5 Showing changes in eating habits or developing eating disorders;
- 7.9.6 Regularly experiencing nightmares or sleep problems; and/or
- 7.9.7 Not receiving adequate medical attention after injuries.
- 7.10 You should also look out for any changes in behaviour or wellbeing and act on any concerns, even if you think you may be being overly sensitive – you should not ignore safeguarding concerns.

Recognising Harm in Vulnerable Adults

- 7.11 Many vulnerable adults have to rely on others to help them with basic day-to-day living. Whilst the majority have excellent care provision, some are at risk of harm. This could be due to another person, or people, deliberately taking advantage of the adult. But it could also be the adult who is unintentionally putting themselves at risk, simply because they don't have the right level of support in place. The below contains a summary of the signs and types of abuse in vulnerable adults, and <https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse> should be consulted for further details.
- 7.12 Harm in vulnerable adults can commonly (but not exclusively) take the following forms:
- 7.12.1 Financial: for example when a vulnerable adult is the victim of theft;
 - 7.12.2 Physical: for example when a vulnerable adult is deliberately hurt by someone else;
 - 7.12.3 Sexual: for example when a vulnerable adult is being sexually harassed or assaulted;
 - 7.12.4 Psychological: for example when a vulnerable adult is being bullied;
 - 7.12.5 Neglect: for example when a vulnerable adult is not dressing, washing or eating properly, or is not being adequately cared for.
- 7.13 The following are some common (but not all) possible indicators of potential harm in vulnerable adults- where a vulnerable adult:
- 7.13.1 Gives money to someone for reasons that concern you;
 - 7.13.2 Is unclear or confused about where their money has gone;
 - 7.13.3 Is stressed about money issues or debt (note that sources of support may be available through the ICAS Foundation such as the Additional Support Fund);
 - 7.13.4 Has cuts, bruises or other marks they can't properly explain;
 - 7.13.5 Tries to hide injuries or refuses to talk about them;
 - 7.13.6 Is fearful or withdrawn around certain people or in certain situations;
 - 7.13.7 Is persistently having friends or strangers 'hanging out' at their house;
 - 7.13.8 Is being verbally bullied by others;
 - 7.13.9 Appears to be encouraged by others to take part in illegal or socially unacceptable activity;
 - 7.13.10 Appears nervous, withdrawn or intimidated in the presence of others;
 - 7.13.11 Becomes tearful or upset when their relationship is mentioned;
 - 7.13.12 Is becoming socially isolated; and/or
 - 7.13.13 Can no longer look after themselves or their property.
- 7.14 You should look out for any changes in behaviour or wellbeing and act on any concerns, even if you think you may be being overly sensitive – you should not ignore safeguarding concerns.

Reporting process

- 7.15 The DSO or DDSO will act as the point of contact within the ICAS Foundation for the receipt and recording of safeguarding and wellbeing concerns. The DSO or DDSO may establish facts about the concern without investigation, before passing on the concern to relevant bodies for investigation and action.

How to respond to concerns

Concerns of Abuse

- 7.16 You should not ignore safeguarding concerns. However, it is not your responsibility to decide that child abuse is occurring. Your duty is to report your concerns immediately.
- 7.17 If a someone we work with says or indicates that they are being abused or information is obtained which gives concern that abuse has or is occurring, the person receiving this information should:
- 7.17.1 Remain calm
 - 7.17.2 Listen to the student.
 - 7.17.3 Take all concerns seriously and act promptly.

- 7.17.4 Do not investigate concerns by, for example, taking photographs of injuries or asking leading questions.
- 7.17.5 Share concerns with the DSO or DDSO immediately.
- 7.17.6 Record the information in writing as soon as possible and pass this on to the DSO or DDSO.
- 7.17.7 Always seek advice from the DSO or DDSO if unsure.
- 7.18 You must immediately report any disclosure of child abuse you receive from a child themselves or any other concerned party.
- 7.19 The DSO will take all concerns and allegations of abuse seriously and record and respond appropriately – this may require a referral to the police, children's social care services, the independent Local Authority Designated Officer.

Dealing with Disclosures

- 7.20 A disclosure is when a person communicates that they are at risk, or when a third party communicates that they have seen an incident of abuse or neglect, or found evidence that indicates it may be occurring.
 - 7.20.1 A disclosure can be verbal but can also be written (for example a text message, email or letter).
 - 7.20.2 A disclosure can relate to abuse that is happening now, may happen in the future or has happened in the past (historical).
- 7.21 When responding to disclosures, our People must follow the disclosure guidelines below.
 - 7.21.1 Keep questions to a minimum and explain what you need to do next;
 - 7.21.2 Explain that you will need to pass the information on in order to reduce any risk to them or others;
 - 7.21.3 Record the information in writing as soon as possible and pass this to the DSO or DDSO at the very first opportunity.
- 7.22 The DSO will take all Disclosures seriously and record and respond appropriately. If the DSO or DDSO decides further action is necessary, they will either refer it on to an external agency or deem that the situation can be monitored within the ICAS Foundation.
- 7.23 All information received will be dealt with sensitively and only shared further where there is a need to protect anyone from harm.

8. Allegations against our People

- 8.1 Concerns should be raised in accordance with our Complaints procedure. In all cases, action will be taken as quickly, confidentially and professionally as possible.
- 8.2 In every instance the DSO will ensure that the required action is taken or where the concerns or complaint is about them, the DDSO.
- 8.3 In order that a full and fair investigation can be conducted, consideration will be given to whether the individual should be suspended from their duties (in the case of an employee on full pay) or their role. Suspension is not an indicator of guilt, the outcome of the process or a disciplinary sanction in itself.
- 8.4 The following policies will be followed:
 - 8.4.1 Where the complaint is about a member of staff: the disciplinary procedure set out in the ICAS Disciplinary Policy
 - 8.4.2 Where the complaint is about a non-staff member: the procedure set out in the ICAS Foundation Complaints Policy will be followed.
- 8.5 An accused person will be:
 - 8.5.1 Treated fairly and honestly and helped to understand the concerns expressed and processes involved;
 - 8.5.2 Be kept informed of the progress and outcome of any investigation and the implications of any decision; and
 - 8.5.3 Be offered appropriate support during the process.

