

Child and Vulnerable Adult Protection Policy and Procedures

EY Foundation

July 2021

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1. Introduction

The purpose of this document is to outline the Child and Vulnerable Adult Protection Policy and procedures for the EY Foundation, in relation to the requirements of UK Legislation, the Charity Commission for England, Wales and Scotland, and as an EY member firm – this covers both children and vulnerable adults (collectively referred to as “young people” throughout this document).

Also included within this policy are references to, or extracts from, the EY Foundation’s Volunteer policy, Whistleblowing policy, Data Protection policy, Online Safety policy, and Photography policy. These policies together inform our processes and procedures for keeping young people that we work with safe.

2. EY Foundation - Our Child and Vulnerable Adult Protection Policy (England and Wales)

This policy applies to all staff, including senior managers and the board of trustees, volunteers and seconded staff, mentors, agency staff, contract, seasonal, apprentices, interns, students or anyone working on behalf of the EY Foundation in either a voluntary or paid capacity. This also includes third party suppliers.

2.1 The purpose of this policy:

- to protect children and vulnerable adults (collectively referred to as “young people”) who receive EY Foundation services. Under the *Children Act 1989*, a child is legally defined as anyone who has not reached their 18th birthday. See section 4 for definitions of vulnerable adult.
- to provide staff, trustees, volunteers, and third-party suppliers, with the overarching principles that guide our approach to child protection and protecting vulnerable adults.

The EY Foundation believes that a young person should never experience abuse of any kind. We believe everyone has a responsibility to promote the welfare of all young people and to keep them safe. We are committed to practice in a way that protects them.

2.2 Legal framework

This policy has been drawn up on the basis of law and guidance that seeks to protect young people, namely:

- Children Act 1989
- Public Interest Disclosure Act 1998
- Data Protection Act 2018
- Sexual Offences Act 2003
- Children Act 2004
- The Safeguarding Vulnerable Groups Act 2006
- The Care Act 2014
- Children and Social Work Act 2017
- Relevant government guidance on safeguarding children

2.3 Safer Recruitment Policy Statement

The EY Foundation is committed to:

- Safeguarding and protecting young people by implementing robust safer recruitment practices
- Identifying and rejecting applicants who are unsuitable to work with children and young people
- Responding to concerns about the suitability of applicants during the recruitment process
- Responding to concerns about the suitability of employees or volunteers once they have begun their role
- Ensuring all new staff and volunteers participate in some child protection training

2.4 We recognise that:

- The welfare of the young person is paramount, as enshrined in the Children Act 1989
- All young people, regardless of background, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have a right to equal protection from all types of harm or abuse
- Some young people and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues (see section 4 for definitions) working in partnership with young people, their parents, carers and other agencies is essential in promoting young people’s welfare
- We have a commitment to safer recruitment of employees and volunteers (see safer recruitment policy statement in section 2.3 for more information)
- We have a commitment to protect young people and vulnerable adults who receive EY Foundation’s

services and who make use of information and communication technology (such as mobile phones technology and the Internet) as part of their involvement with us and ensure that, as an organisation, we operate in line with our Online Safety policy and within the law.

2.5 We will seek to keep young people safe by:

- Valuing them, listening to and respecting them
- Appointing a nominated child protection lead and a member of the trustee board who takes lead responsibility for safeguarding
- Adopting child protection and vulnerable adults' practices through detailed procedures and a code of conduct for staff, trustees, and volunteers
- Providing effective management for staff, trustees and volunteers through supervision, support and training, including compulsory online NSPCC training where required. We will also ensure that they understand and follow the child protection procedures.
- Recruiting staff, trustees and volunteers safely, ensuring all necessary checks are made
- Supporting and encouraging the young people using our service to use the opportunities offered by information and communication technology in a way that keeps themselves safe and shows respect for others
- Sharing information about our child protection policy with parents, carers, staff, trustees and volunteers, so they know what to do if they have a concern
- Sharing concerns with agencies who need to know and involving parents and young people appropriately

We are committed to reviewing our policy annually.

This policy was last reviewed on July 2021

3. EY Foundation - Our Child and Vulnerable Adult Protection Policy (Scotland)

This policy applies to all staff, including senior managers and the board of trustees, volunteers and seconded staff, mentors, agency staff, contract, seasonal, apprentices, interns, students or anyone working on behalf of the EY Foundation in either a voluntary or paid capacity. This also includes third party suppliers.

3.1 The purpose of this policy:

- to protect children and vulnerable adults (collectively referred to as “young people”) who receive EY Foundation services. Under the *Children (Scotland) Act 1995* a child is legally defined as anyone who has not reached their 18th birthday. See section 4 for definitions of vulnerable adult
- to provide staff, trustees, volunteers, and third-party suppliers with the overarching principles that guide our approach to child protection and protecting vulnerable adults.

The EY Foundation believes that a young person should never experience abuse of any kind. We believe everyone has a responsibility to promote the welfare of all young people and to keep them safe. We are committed to practice in a way that protects them.

3.2 Legal framework

This policy has been drawn up on the basis of law and guidance that seeks to protect young people, namely:

- Children (Scotland) Act 1995
- Data Protection Act 2018
- Protection of Children (Scotland) Act 2003
- National Guidance for Child Protection in Scotland (The Scottish Government, 2014)
- Protection of Vulnerable Groups Act (PVG) (Scotland) Act 2007
- Children and Young People (Scotland) Act 2014
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill
- Relevant government guidance on safeguarding children

3.3 Safer Recruitment Policy Statement

The EY Foundation is committed to:

- Safeguarding and protecting young people by implementing robust safer recruitment practices
- Identifying and rejecting applicants who are unsuitable to work with children and young people
- Responding to concerns about the suitability of applicants during the recruitment process
- Responding to concerns about the suitability of employees or volunteers once they have begun their role
- Ensuring all new staff and volunteers participate in some child protection training

3.4 We recognise that:

- The welfare of the young person is the primary concern, as enshrined in the Children Act (Scotland) 1995
- All young people, regardless of background, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have a right to equal protection from all types of harm or abuse
- Some young people and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues (see section 4 for definitions) working in partnership with young people, their parents, carers and other agencies is essential in promoting young people’s welfare
- We have a commitment to safer recruitment of employees and volunteers (see safer recruitment policy statement in section 3.3 for more information)
- We have a commitment to protect children and vulnerable adults who receive EY Foundation’s services and who make use of information and communication technology (such as mobile phones technology and the Internet) as part of their involvement with us and ensure that, as an organisation, we operate in line with our Online Safety policy and within the law.

3.5 We will seek to keep young people safe by:

- Valuing them, listening to and respecting them
- Appointing a nominated child protection lead and a member of the trustee board who takes lead responsibility for safeguarding
- Adopting child protection and vulnerable adults' practices through detailed procedures and a code of conduct for staff, trustees, and volunteers
- Providing effective management for staff, trustees and volunteers through supervision, support and training, including compulsory online NSPCC training where required. We will also ensure that they understand and follow the child protection procedures.
- Recruiting staff, trustees and volunteers safely, ensuring all necessary checks are made
- Supporting and encouraging the young people using our service to use the opportunities offered by information and communication technology in a way that keeps themselves safe and shows respect for others
- Sharing information about our child protection policy with parents, carers, staff, trustees and volunteers, so they know what to do if they have a concern
- Sharing concerns with agencies who need to know and involving parents and young people appropriately.

We are committed to reviewing our policy annually.

This policy was last reviewed in July 2021

4. Key definitions

The EY Foundation's mission is to work directly with young people from low income backgrounds aged 11-21 years, with employers and social entrepreneurs, to create and support pathways to education, employment and enterprise.

For the purpose of the child and vulnerable adult protection policy and procedures, the terms below are defined as follows.

4.1 Safeguarding and promoting the welfare of children:

- Protecting children from maltreatment
- Preventing the impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully

4.2 A child

Under the *Children Act 1989* and the *Children (Scotland) Act 1995* a child is legally defined as anyone who has not reached their 18th birthday. Child protection and legislation and guidance therefore only applies to those users of the EY Foundation services up to that age. The Foundation will also work with those over the age of 18 and recognises its duty of care to all the young people with whom it works, including vulnerable adults up to 30.

4.3 A vulnerable adult

As defined by the *Safeguarding Vulnerable Groups Act 2006*, a vulnerable adult is defined as a person who is aged 18 years or over and who is:

- Living in residential accommodation, such as a care home or residential special school; who may need community care services by reason of mental or other disability, age and illness
- Detained in lawful custody and who may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation
- Abuse can affect any vulnerable adult, but particularly someone who is, or may be, unable to protect themselves against significant harm or exploitation, for example:
 - Older people
 - People with mental health problems
 - Disabled people
 - People with learning difficulties
 - People with acquired brain damage
 - People who misuse substances

4.4 Child protection

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or at risk of suffering, significant harm.

4.5 Named person

Any of the EY Foundation Designated Safeguarding Officers listed in section 6.8 will act, based on a duty rota approach, as the named person and be available to listen, advise and help a child or young person, or help them access other services during their participation in one of the EY Foundation programmes. They will also act as point of contact for staff, trustees and volunteers as defined in section 6.7 Reporting procedure.

5. Code of Conduct

This behaviour code outlines the conduct expected of anyone who engages with young people* through the EY Foundation.

(*Young people for the purposes of this refer to children and vulnerable adults).

5.1 Purpose

Following this code will help to protect young people from abuse and inappropriate behaviour from adults. It will also help staff and volunteers to maintain the standard of behaviour expected of them and will reduce the possibility of unfounded allegations of abuse being made against them.

5.2 Upholding this code of behaviour

- All members of staff, trustees and volunteers are expected to report any breaches of this code under the whistle-blowing procedure (see section 9) or, if necessary, under child protection procedures to the Designated Safeguarding Officers (see section 6.8)
- Any breach of the code involving a volunteer, trustee or member of staff may result in them being asked to leave the EY Foundation
- Serious breaches may also result in a referral being made to a statutory agency such as the police, the local authority children's social care department and/or the Independent Safeguarding Authority
- If the breach involves an EY employee (this includes Foundation staff and EY employed trustees) they may be subject to EY's disciplinary procedures (see section 6)
- If the breach involves a none EY employee on a Foundation programme they may be subject to the procedures outlined under section 6 of this policy.

5.3 The role of staff, trustees and volunteers

When working with young people for the EY Foundation, all staff, trustees and volunteers are acting in a position of trust. It is important that staff, trustees, and volunteers are aware that they may be seen as role models by young people and must act in an appropriate manner at all times.

5.3.1 When working with young people, it is important to:

- Operate within EY Foundation's principles and guidance and any specific procedures;
- Follow the EY Foundation's child protection and vulnerable adult policy and procedures at all times
- Complete compulsory online NSPCC training module before engaging with young people on a 1:1 basis in any capacity, not just as a mentor
- Listen to and respect young people at all times
- Avoid favouritism, for example when working with two or more young people in a group
- Treat young people fairly and without prejudice or discrimination
- Value and take young people's contributions seriously, actively involving young people in planning activities wherever possible
- Ensure any contact with young people is appropriate and in relation to the work of the project
- Always ensure language is appropriate and not offensive or discriminatory
- Follow the Online Safety policy and report any breaches (see section 7)
- Always ensure equipment is used safely and for its intended purpose
- Provide examples of good conduct for young people to follow
- Challenge unacceptable behaviour and report all allegations/suspensions of abuse
- Ensure that whenever possible, there is more than one adult present during activities with young people or if this isn't possible, within sight or hearing of other adults
- Be close to where others are working. If a young person specifically asks for or needs some private time, ensure other staff are aware of this and know where both parties are
- Respect a young person's right to personal privacy
- Encourage young people and adults to feel comfortable and caring enough to point out attitudes or behaviour they do not like
- Recognise that special caution is required when discussing sensitive issues with young people

5.3.2 Staff, trustees and volunteers must not:

- Patronise or treat young people as if they are silly
- Allow allegations of abuse to go unreported
- Develop inappropriate relationships such as contact with young people that is not a part of the work of EY Foundation or agreed with the manager or leader
- Conduct a sexual relationship with a young person or indulge in any form of sexual contact with a young person. Any such behaviour between an adult member of staff, trustee or volunteer and a young person using the services of EY Foundation represents a serious breach of trust on the part of the staff member, trustee or volunteer and is not acceptable under any circumstances (see section 6 for disciplinary action)
- Let young people have personal contact details (mobile number or address)
- “friend” or “follow” young people from personal accounts on social media such as Facebook, Twitter or Instagram
- Communicate with young people via personal accounts or private messages
- Make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of young people
- Act in a way that can be perceived as threatening or intrusive
- Make inappropriate promises to young people, particularly in relation to confidentiality
- Jump to conclusions about others without checking facts
- Either exaggerate or trivialise child abuse issues
- Rely on own reputation or that of the organisation to provide protection

5.4 The role of parents, carers, schools and youth providers

The EY Foundation welcomes and encourages parental/carers involvement. Parents and carers are regarded as valuable partners in promoting positive behaviour and will be involved as appropriate. In the event of their child becoming the subject of behaviour sanctions, parents/carers will be informed.

Designated Safeguarding Officers at schools or youth providers may be contacted by the EY Foundation Designated Safeguarding Officers in cases when incidents are disclosed by young people during their participation on an EY Foundation programme, this is to ensure young people receive the necessary support after they have completed a programme and return to school or care.

6. Procedures for young people at possible risk of abuse

This procedure applies to any paid member of staff, trustee or volunteer who may be concerned about the safety and protection of a young person.

6.1 Purpose and aim of this procedure

We aim to ensure those young people who are beneficiaries of the work delivered by the EY Foundation receive the protection and support they need if they are at risk of abuse. When social distancing measures are in place it is even more important to stay alert, as young people are not being seen by a range of professionals as regularly as they would usually be.

This procedure provides clear direction to staff, trustees, and volunteers at EY Foundation if they have concerns that a young person is in need of protection.

6.2 Different types of abuse (as defined by the NSPCC)

6.2.1 **Physical abuse** is defined as deliberately hurting a child and causing physical harm. It includes injuries such as:

- bruises, broken bones, burns and cuts

It may involve:

- hitting, kicking, shaking, throwing, poisoning, burning, scalding, drowning or any other method of causing non-accidental harm to a child

Physical abuse may also happen when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

6.2.2 **Sexual abuse** is when a child is forced or persuaded to take part in sexual activity. This may involve physical contact or non-contact activities and can happen online or offline. Contact abuse involves activity where an abuser makes contact with a child. It includes:

- Sexual touching of any part of the body whether a child is wearing clothes or not
- Forcing or encouraging a child to take part in sexual activity
- Making a child take their clothes off or touching someone else's genitals
- Rape or penetration by putting an object or body part inside a child's mouth, vagina or anus

Non-contact abuse involves activities where there is no physical contact. It includes:

- Flashing at a child
- Encouraging or forcing a child to watch or hear sexual acts
- Not taking proper measures to prevent a child being exposed to sexual activity by others
- Making a child masturbate whilst others watch
- Persuading a child to make, view or distribute child abuse images
- Making, viewing or distributing child abuse images
- Allowing someone else to make, view or distribute child abuse images
- Meeting a child following grooming with the intent of abusing them
- Sexually exploiting a child for money, power or status

6.2.3 **Emotional abuse** is emotional maltreatment of a child, which has a severe and persistent negative effect on the child's emotional development. It is also known as psychological abuse. There are several categories of emotional abuse:

- Emotional neglect – ignoring the child; not showing affection
- Rejection – verbal humiliation; name-calling; criticism; physical abandonment; excluding the child from activities
- Isolating – putting unreasonable limitations on a child's freedom of movement; restricting social

interaction; not communicating with the child

- Exploiting or corrupting – encouraging a child to take part in criminal activities; forcing a child to take part in activities that are not appropriate for their stage of development
- Terrorising – threatening violence; bullying; deliberately frightening a child; deliberately putting a child in a dangerous situation

6.2.4 **Neglect** is not meeting a child's physical and psychological needs. The four main types of neglect are:

- Physical neglect – not meeting a child's basic needs, such as food, clothing or shelter; not supervising a child adequately or providing for their safety
- Education neglect - not making sure a child receives an education
- Emotional neglect - not meeting a child's needs for nurture and stimulation, for example by ignoring, humiliating, intimidating or isolating them.
- Medical neglect – not providing appropriate healthcare, refusing care or ignoring medical recommendation

Vulnerable adults may be subject to additional categories of abuse:

- **Financial or material:** including withholding money or possessions, theft of money or property, fraud, intentionally mismanaging finances, borrowing money and not repaying
- **Discriminatory abuse:** including slurs, harassment and maltreatment due to a person's race, gender, disability, age, faith, culture or sexual orientation
- **Institutional abuse:** including the use of systems and routines which neglect a person receiving care. This can happen in any setting where formal care is provided.

Due to Covid-19 there are times when we are self-isolating, social distancing and spending more time at home which can put some young people at greater risk of abuse. These measures can also cause stress and changes in behaviour, meaning it may be more difficult to spot the signs of abuse. But if you are worried about a young person, even if you are unsure, then please contact a Designated Safeguarding Officer (see section 6.8 contact details) immediately.

If concerned about the safeguarding of vulnerable adults, please contact your local Adult Social Care Department, which is part of your local authority.

6.3 Ways that abuse might be brought to someone's attention

- A young person might make a direct disclosure about him or herself
- A young person might make a direct disclosure about another young person
- A young person might offer information that is worrying but not a direct disclosure
- A member of staff/trustee/volunteer might be concerned about a young person's appearance or behaviour or about the behaviour of a parent or carer towards a young person
- A parent or carer might make a disclosure about abuse that a young person is suffering or at risk of suffering
- A parent/carer might offer information about a young person that is worrying but not a direct disclosure

6.4 Talking to a young person who has said that he/she or another young person is being abused

- Stay calm, listen carefully and take it seriously
- Give your full attention and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Respect pauses and don't interrupt the young person – let them go at their own pace. Recognise and respond to their body language. Remember that it may take several conversations for them to share what has happened to them.
- Make it clear you're interested in what the young person is telling you. Reflect back what they've said to check your understanding – use their language to show it's their experience.
- Consult a Designated Safeguarding Officer (see section 6.8 contact details) **immediately** (i.e. on the same day the young person discloses information about a potential abuse)
- In the event that a Designated Safeguarding Officer cannot be reached by the close of play that day, please contact the NSPCC Hotline on 0808 800 5000
- For out of hours, please contact the NSPCC Hotline on 0808 800 5000
- Make a careful record of what was said – word for word if possible (see Appendix A)
- The person reporting the abuse is not responsible for deciding whether or not an abuse has occurred – this is the role of the Designated Safeguarding Officer
- Give the child the ChildLine phone number: 0800 1111.

6.5 Helping a young person in immediate danger or in need of emergency medical attention

- If the young person is in immediate danger and is in the immediate vicinity, remain with him/her and call the police
- If the young person is elsewhere, contact the police and explain the situation to them
- If he/she needs emergency medical attention, call an ambulance and, whilst waiting for it to arrive, get help from your first aider
- If the first aider is not available, use any first aid knowledge (if applicable) to help the young person
- Contact a Designated Safeguarding Officer (see section 6.8 contact details) for child protection to let them know what is happening.

6.5.1 A decision will need to be made about who should inform the young person's family and the local authority children's social care department, and when they should be informed. If the police have been involved and/or the health services, they should be part of this decision.

Consider the welfare of the young person in the decision-making process as the highest priority. Issues that will need to be taken into account are:

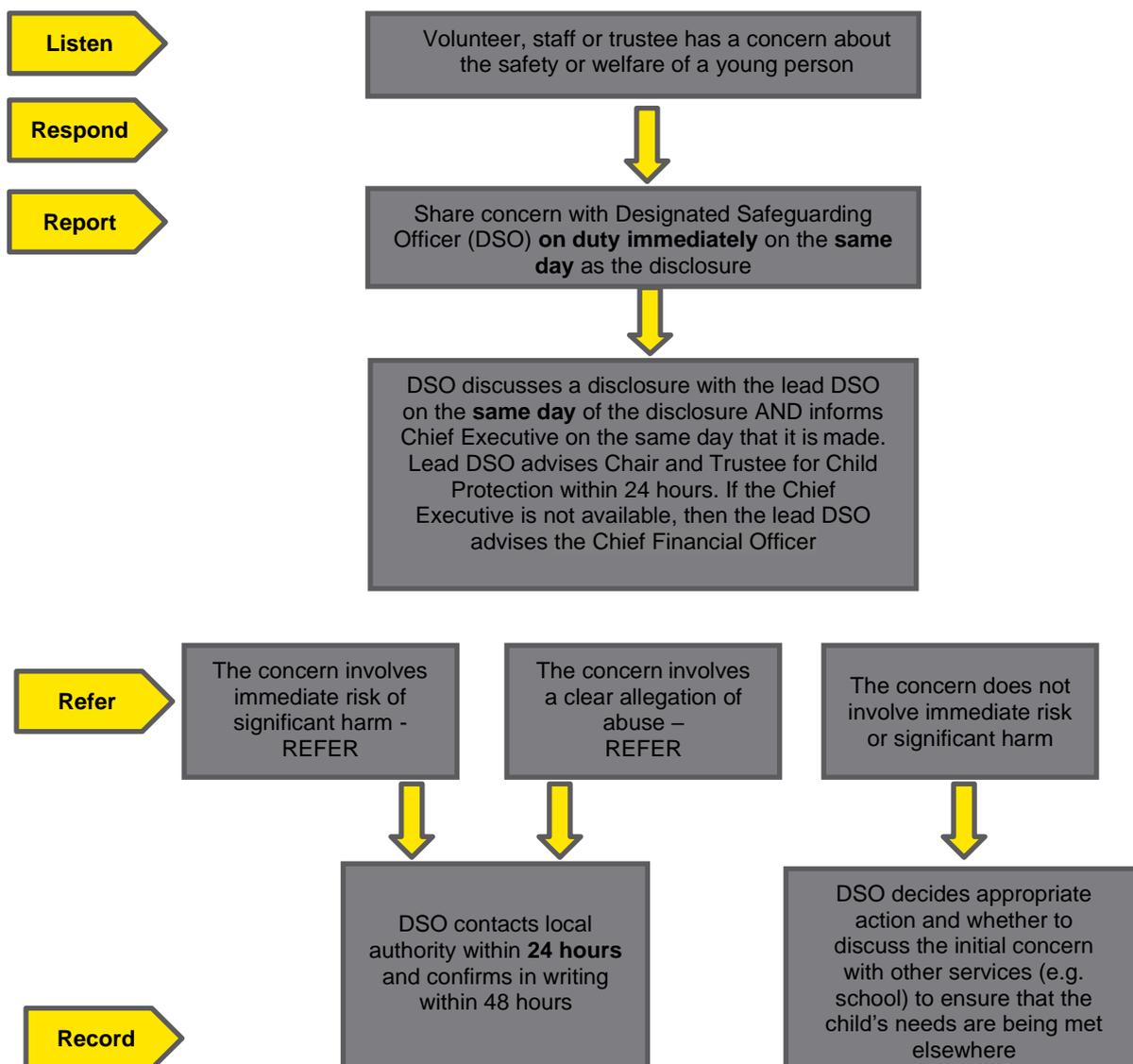
- The young person's wishes and feelings
- The parent/carer's right to know (unless this would place the young person or someone else in danger, or would interfere with a criminal investigation)
- The impact of telling or not telling the parent/carer
- The current assessment of the risk to the young person and the source of that risk
- Any risk management plans that currently exist.

6.6 Keeping a record of concerns

The Designated Safeguarding Officer for child protection will provide a form to record the concern and how it is dealt with. The relevant sections of the form should be completed and then it should be signed. It can be used to forward information to the statutory child protection authorities if a referral to them is needed.

The form should be signed and dated by all those involved in its completion and kept confidentially on the young person's file. The name of the person making the notes should be written alongside each entry. Records are kept in a secure e-folder which only Designated Safeguarding Officers have access to. The Chief Executive, or Chief Financial Officer of the EY Foundation will be notified by Designated Safeguarding Officers of any child protection concerns and any course of action to be followed, although personal details will not be disclosed. The Lead Designated Safeguarding Officer will also notify the EY Foundation Chair, Patrick Dunne, and Trustee for Child Protection, Rosehanna Chowdhury within 24 hours. They will inform the wider EY Foundation board as appropriate.

6.7 Reporting procedure



6.7.1 The responsibility to report serious incidents to the charity commission

In case of a serious safeguarding incident, alongside following the reporting procedure, the EY Foundation must as well promptly report it to the Charity Commission, even if it was reported to the police, donors or another regulator. Full details must be provided, including how the situation is being handled. This requirement is to ensure that the trustees comply with their legal duties and that the charity is managing the incident responsibly, taking the necessary steps to limit its immediate impact and, where possible, prevent it from happening again. Reporting also means that the Commission can identify whether other charities might be affected, being able to give them all better advice and help to protect themselves.

6.7.2 What can be considered a serious safeguarding incident?

- 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 this happened while they were under the care of the charity
- Someone connected with the charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual)
- 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

- Breaches of procedures and 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 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.

6.7.3 Which details must be included in the serious incident report?

- Identification of the person who is reporting, his/her connection to the EY Foundation, and the authority that the person has to report on behalf of the charity's trustees (it is most likely to be a Designated Safeguarding Officer)
- Date of the incident and what happened
- Date the charity found out about the incident and how they found out about the incident
- What impact the incident has had on the charity's beneficiaries, finances, staff, operations or reputation
- Whether trustees are aware of the incident
- Which of the charity's policies or procedures relate to the incident and if they were followed
- What steps the charity has taken to deal with the incident
- What steps the charity has taken to prevent similar incidents
- Where applicable, the charity's media handling or press lines, including a link to the press release if available

6.7.4 What happens next?

The Commission will let the charity know that it has received the report. It will assess the nature and level of any risks and look at how the charity is dealing with the incident, and may take steps to verify the details, for example by contacting the police. Once the Commission has completed this assessment, it will let the charity know the outcome.

6.8 Contact details

A minimum of two DSO's will be available at all times

EY Foundation team	Name	Contact
Lead Designated Safeguarding Officer	Jodie McNally	0161 333 3000 or 07342 022130
Designated Safeguarding Officer	Lynne Peabody	0207 951 5803 or 07958 269112
Designated Safeguarding Officer	Anu Atewologun	0207 7830611 or 07504 632451
Designated Safeguarding Officer	Robert Pope	0207 9513133 or 07798 928419
Designated Safeguarding Officer	Anita Chouhan	0161 333 3000 or 07500 028402
Designated Safeguarding Officer	James Dundas	0141 226 7359 or 07469 036 520
Designated Safeguarding Officer	Rachel Lyons	0207 197 7292
Chief Executive	Maryanne Matthews	0207 951 8448 or 07920 813081
Acting Chief Executive	Lynne Peabody	0207 951 5803 or 07958 269112
Joint Chief Financial Officer	Mark Smith	0207 980 9117 or 07970 950225
Joint Chief Financial Officer	Nil Neale	0207 951 3133 or 07785 488 079

Location	Local Authority Children's Social Care Department	Local Authority Adult Social Care Department
Birmingham	0121 303 1888	0121 303 1234
Bristol	0117 357 4700	0117 922 2700
Cambridge	0345 045 5203	0345 045 5202
Edinburgh	0131 200 2327	0131 200 2324
Glasgow	0141 287 0555	0141 287 0555
Leeds	0113 222 4403	0113 222 4401
Liverpool	0151 233 3700	0151 233 3800
London	Different for each LA	Different for each LA
Luton	01582 547653	01582 547730
Manchester	0161 234 5001	0161 234 5001
Newcastle	0191 277 2500	0191 278 8377
Reading	0118 937 3641	0118 937 3747
Southampton	023 8083 3336	023 8083 3003

Other useful contacts	Phone	Internet
NSPCC Hotline	0808 800 5000	help@nspcc.org.uk
Childline	0800 1111 (textphone 0800 400 222)	www.childline.org.uk

6.9 Dealing with allegations involving EY Foundation staff and/or volunteers, trustees and young people

6.9.1 This procedure outlines what should happen if an allegation is made against an adult working for or involved in the EY Foundation. This procedure also applies where an allegation is made against another young person on the programme. Please also refer to the EY Whistleblowing policy, which is referenced later on in this document.

6.9.2 This procedure applies to:

- any member of staff, volunteer or trustee to whom an allegation of abuse has been made, that involves another member of staff, volunteer, trustee or young person
- anyone in a managerial position (including the named person for child protection, line managers, supervisors and trustees) who may be required to deal with such allegations and manage investigations that result from them

6.9.3 Concerns about staff, trustees, volunteers and other young people must be treated with the same rigor as other child protection concerns. If a concern or allegation of abuse or inappropriate conduct is made against a member of staff, or a person in a position of trust, or there is suspicion regarding a member of staff, trustees, volunteers or young person's conduct, with regard to children, they must be reported immediately to a Designated Safeguarding Officer. If the allegation or suspicion concerns a Designated Safeguarding Officer, then contact Maryanne Matthews, Chief Executive of the Foundation. If the allegation or suspicion concerns the Chief Executive, then contact Patrick Dunne, Chair of the EY Foundation.

6.9.4 The aims of this procedure are:

- to ensure that young people who participate in the EY Foundation programmes, are protected and supported following an allegation that they may have been abused by an adult from within the EY Foundation, or another young person on the programme
- to ensure that there is a fair, consistent and robust response to any allegations made, so that the risk posed to other young people by an abusive individual is managed effectively
- to facilitate an appropriate level of investigation into allegations, whether they are said to have taken place recently, at any time the person in question has been employed by/volunteered with the EY Foundation or prior to the person's involvement with the EY Foundation (i.e. if it comes to attention whilst the person is working on behalf of the EY Foundation)
- to ensure that the EY Foundation continues to fulfil its responsibilities towards members of staff, volunteers, trustees or young people who may be subject to such investigations, for example giving consideration to the provision of appropriate support during and after the investigation
- to ensure that individuals are able to continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin.

6.9.5 There are potentially three issues that need to be dealt with as a matter of urgency:

1. Is a young person in immediate danger or does she/he need emergency medical attention?

If yes, follow the same procedure as identified in section 6.5 above.

2. Is the person at the centre of the allegation another young person on an EY Foundation programme?

If this is the case, the concern needs to be discussed immediately with the Chief Executive of the Foundation or the Chief Financial Officer in her absence and the Lead Designated Safeguarding Officer.

One of these should then contact EY HR and the school/youth provider (where relevant) and, in a sensitive manner, the EY Foundation may suspend the young person from the programme until the allegation is investigated and it is determined whether the young person continues on the programme or is permanently removed.

The information provided to him/her may need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the local authority children's social care department, the police or the local authority designated officer (LADO). The police and children's social care department may have views on what information can be disclosed to the person.

3. Is the person at the centre of the allegation working with young people now?

If this is the case, the concern needs to be discussed immediately with the Chief Executive of the Foundation or the Chief Financial Officer in her absence and the Lead Designated Safeguarding Officer. One of these should then, in a sensitive manner, remove the staff member involved in the allegation from direct contact with young people until the allegation is investigated.

The information provided to him/her at this stage may need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the local authority children's social care department, the police or the local authority designated officer (LADO). The police and children's social care department may have views on what information can be disclosed to the person.

If the volunteer, staff or trustee is an EY member of staff, EY HR should be informed.

If the volunteer, staff or trustee is not an EY member of staff, the Foundation may make a referral to their current employer (where applicable).

6.9.6 Taking disciplinary action

Where the allegations are particularly serious or there is no doubt, and clear evidence, that an offence has been committed the police and/or children's social care will be informed within one working day of the allegation being reported. A strategy for further action will then be agreed before a decision is taken as to notifying the staff member/trustee/volunteer/young person.

If the initial allegation does not involve a possible criminal offence, the Lead Designated Safeguarding Officer and EY Foundation Chief Executive or the Chief Financial Officer in her absence should still consider whether formal disciplinary action is needed.

If the local authority children's social care department has undertaken any enquiries to determine whether a child or children are in need of protection, the Designated Safeguarding Officers should take account of any relevant information from these enquiries when considering whether disciplinary action should be brought against the person at the centre of the allegations.

Where the employer is EY, investigations and disciplinary action will be conducted by the EY HR team. If the volunteer, staff or trustee is not an EY member of staff, the Foundation may make a referral to their current employer (where applicable).

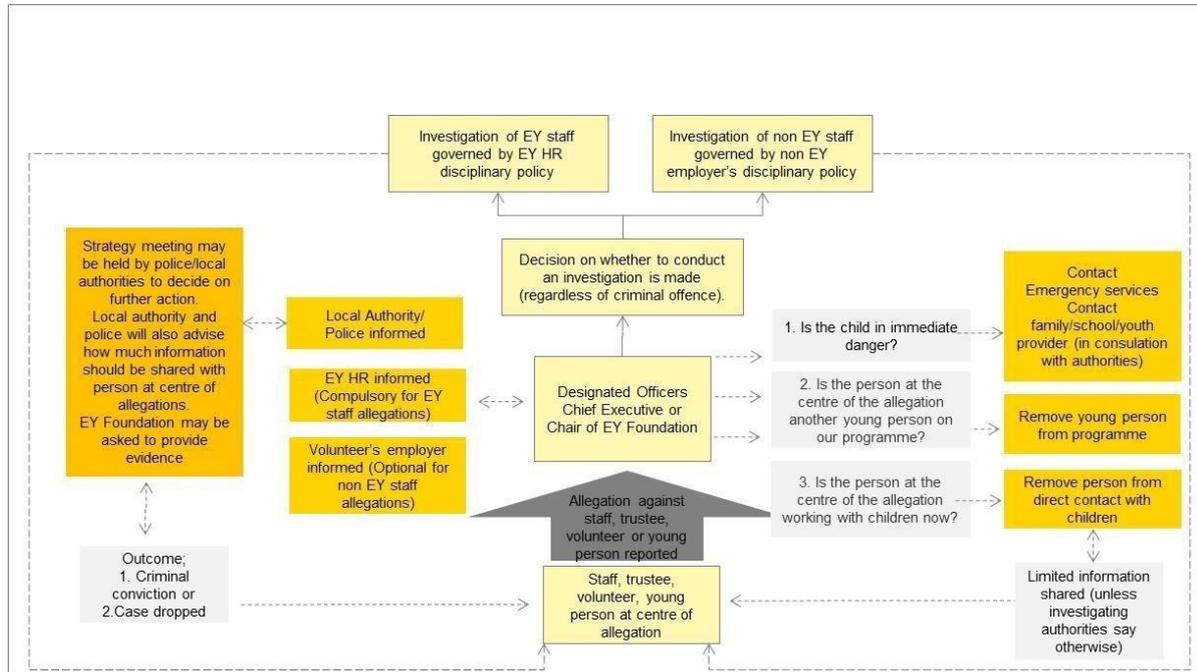
6.9.7 Talking to parents about the allegation or concern

If the young person's parents/carers do not already know about the allegation, the Lead Designated Safeguarding Officer and the LADO need to discuss how they should be informed and by whom.

6.9.8 Following an allegation

If the allegation is substantiated and if, once the case is concluded, the EY Foundation or EY dismisses the person or ceases to use their services, or the person ceases to provide his/her services, the Lead Designated Safeguarding Officer should consult with the LADO about referral of the incident to the Disclosure and Barring Service (DBS). This should take place within a month.

6.9.10 Process for dealing with an allegation



6.9.11 Keeping a record of the investigation

All those involved in dealing with the allegation should keep clear notes of the allegations made, how they were followed up, and any actions and decisions taken, together with the reasons for these.

These notes should be compiled gradually as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside.

The notes should be kept confidentially on the file of the person who is the subject of the allegation. Discussion should take place with the LADO to determine whether any aspects of the notes may not be shared with the person concerned. If there are no reasons not to do so, a copy of the records should be given to the individual.

The notes should be held on file in accordance with section 11 of this policy.

7. Our Online Safety policy

7.1 This policy and the procedures that it underpins apply to all staff, including senior managers and the board of trustees, paid staff, volunteers and seasonal workers, agency staff, students and anyone working on behalf of the EY Foundation:

- To protect young people and vulnerable adults who receive EY Foundation's services and who make use of information technology (such as mobile phones and the Internet) as part of their involvement with us
- To provide staff, trustees and volunteers with the overarching principles that guide our approach to online safety
- To ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use information technology.

7.2 We recognise that:

- The online world provides everyone with many opportunities, however it can also present risks and challenges
- We have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- We have responsibility to help keep children and young people safe online, whether or not they are using EY's network and devices
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety

7.3 We will seek to promote online safety by:

- Appointing an online safety coordinator(s)
- Providing clear and specific directions to staff and volunteers on how to behave online through our behaviour code
- Supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- Supporting and encouraging parents and carers to do what they can to keep their children safe online
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person
- Reviewing and updating the security of our information systems regularly
- Ensuring that user names, logins, email accounts and passwords are used effectively
- Ensuring personal information about the adults and young people who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- Providing supervision, support and training for staff and volunteers about online safety
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation
- Asking all staff and volunteers not to communicate with young people through personal social media platforms, e.g. not accepting them as friends on websites such as Facebook, or switching privacy settings on websites such as Twitter or Instagram so that follower requests can be declined.

The names of our online safety coordinators are Shaun Gloc (0141 226 7449) and Priya Singam (020 7980 9330).

We are committed to reviewing our policy, procedures and good practice annually.

This policy was last reviewed on July 2021

8. Photography policy

8.1 When taking and using photographs of young people, we will seek to keep young people safe by:

- Always asking for written consent from a young person and their parents or carers before taking and using a young person's image
- Always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of young people
- Making it clear that if a young person or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published
- Changing the names of young people whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
- Never publishing personal information about individual young people and disguising any identifying information (for example the name of their school or a school uniform with a logo)
- Making sure young people, their parents and carers understand how images of young people will be securely stored and for how long (including how we will control access to the images and their associated information)
- Reducing the risk of images being copied and used inappropriately by:
 - Only using images of children in appropriate clothing (including safety wear if necessary)
 - Avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
 - Using images that positively reflect young people's involvement in the activity

Sample consent form (parents/carers and children):

The EY Foundation Photography, Quotes and Video Consent

The EY Foundation 2021

Photography, quotes and short videos are the way The EY Foundation spreads the word about its work so that we can help more young people. That's why we'd like to ask for your agreement to be in photos, videos and to use quotes you have given for our communications. This includes the use of these by us on our social media channels, website, promotional materials, reports and in media releases.

PLEASE NOTE: This form **MUST** be hand signed or signed using DocuSign

Release form – quotes and photos

I, _____, hereby give my consent to the use of the quotes and information provided and photographs that include my appearance and I hereby confirm that such consent shall extend to any and all purposes listed above in all media for the full period of the copyright (which will remain the property of The EY Foundation and its licensors) and therefore in so far as possible in perpetuity.

I hereby give consent for all purposes of The Copyright Designs and Patents Act (1988) as may be amended from time to time.

Signature: _____

Date: _____

Parental consent

I provide consent to the use of photos and information of my child(ren) under the same terms as stated above.

Signature: _____

Date: _____

Release form - film

I, _____, hereby give my consent to the filming and recording of my appearance in videos and (subject to terms of any applicable industry agreement, but otherwise without restriction) hereby confirm that such consent shall extend to my appearance in such videos for any and all purposes listed above in all media for the full period of the copyright (which will remain the property of The EY Foundation and its licensors) and therefore in so far as possible in perpetuity.

I hereby give consent for all purposes of The Copyright Designs and Patents Act (1988) as may be amended from time to time.

Signature: _____

Date: _____

Parental consent:

I also provide consent to the filming and recording of my child(ren) in videos under the same terms as stated above.

Signature: _____

Date: _____

Please note you have the right to change your e-communications preferences at any time or to have your personal data deleted from our databases (including our opt-out list). If you wish to withdraw your consent to our use of your quotes, your appearance in any photographs or videos or have your personal data deleted, please send an email to enquiries@eyfoundation.ey.com.

Your privacy is important to us. Our full Privacy Policy can be found on our website:

[www.ey.com/Publication/vwLUAssets/EY-Foundation-Privacy-Notice/\\$FILE/EY-Foundation-Privacy-Notice.pdf](http://www.ey.com/Publication/vwLUAssets/EY-Foundation-Privacy-Notice/$FILE/EY-Foundation-Privacy-Notice.pdf)

9. Whistle-blowing Policy

During the course of your engagement with the EY Foundation, you may become aware of conduct which you either know or suspect is unlawful or otherwise unacceptable. You may have noticed the conduct yourself or you may have been contacted by a whistle-blower. The EY Foundation has a Whistleblowing policy which can be accessed via our website or via the EY Foundation team by emailing enquiries@eyfoundation.ey.com

10. Information Sharing

10.1 Information sharing is key for improving outcomes for all young people. It is essential to enable early intervention and preventative work for safeguarding young people and for wider public protection. Staff, trustees or volunteers who have contact with young people must understand what to do and the most effective ways of sharing information. This is particularly relevant if they believe a young person is in need, including young people at risk of suffering harm.

EY Foundation recognises that timely information sharing is key to safeguarding and promoting the welfare of young people. We may need to share information for the following reasons:

- We are making a referral to arrange additional support for a young person or their family
- Someone from another agency has asked for information about a young person
- A young person or family has asked to be referred for further help
- A statutory duty or court order requires information to be shared
- We are concerned that a young person or family member may be at risk of significant harm
- We think a serious crime may have been committed or is about to be committed which involves someone in the family
- We will keep a record of why we have shared information about a young person or their family and will ensure we are not putting a young person's safety and welfare at risk by sharing information about them
- We will always seek consent to share information about a young person or their family. However, if consent isn't given, we can still share information with relevant professionals under certain circumstances i.e. if we are protecting a young person from significant harm.

10.2 If an EY Foundation staff member, trustee or volunteer believes that a young person may be at risk of, or is suffering, significant harm and that they need to refer them to the Designated Safeguarding Officers, they need to consider whether they have a duty of confidentiality to the young person. If this is so, they may share information if they have the consent of the young person or if they believe, based on their professional judgment that the sharing of information is in the public interest.

10.3 Any concerns should also be discussed with the family and if possible, their agreement should be sought, unless this would put the young person at increased risk of significant harm, or if it would undermine any possible criminal investigation. This should be done in consultation with the Designated Safeguarding Officer.

10.4 If the professional needs to share information and cannot get consent they must consider, on the facts of each case, whether it is in the public interest to share all or some of the information they have. The key factors to consider are necessity and proportionality, "i.e. whether the proposed sharing is likely to make an effective contribution to preventing the risk and whether the public interest in sharing information overrides the interest in maintaining confidentiality."

10.5 Some circumstances in which the sharing of confidential information without consent would normally pass the public interest test are:

- "when there is evidence or reasonable cause to believe that a child is suffering, or is at risk of suffering, significant harm
- to prevent significant harm to a child....., including through the prevention, detection and prosecution of serious crime."

If a professional is unsure of what constitutes "reasonable cause to believe" they should discuss their concerns with their Designated Safeguarding Officer(s). Concerns should always be acted upon and any decision on whether to share information or not should always be recorded.

Any information shared should always be accurate, up to date, shared appropriately and securely: only with the person or people who need to know and limited to information relevant to purpose.

11. Policy on the secure handling, storage, retention and destruction of child protection records

EY Foundation will process any personal data related to young people in accordance with the Data Protection Act 2018, and any other relevant legislation.

The Data Protection Act 2018 establishes strict rules of good information handling which organisations using personal information are required to observe; these rules are known as the Data Protection Principles and stipulate that personal information should be:

- Used fairly, lawfully and transparently
- Used for specified, explicit purposes
- Used in a way that is adequate, relevant and limited to only what is necessary
- Accurate, and where necessary, kept up to date
- Kept for no longer than is necessary
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorized processing, access, loss, destruction or damage

EY Foundation will process any personal information related to safeguarding children in accordance with these Principles.

The EY Foundation's Data Protection policy can be found on our website or via the EY Foundation team and is in line with the EY Data Protection Policy (this can be found at <http://www.ey.com/UK/en/Home/Privacy-policy>) If you have questions or you do not feel that your concerns have been addressed in our privacy statement please email us at enquiries@eyfoundation.ey.com.

11.1 Safeguarding children

EY Foundation is committed to safeguarding children and developed a clear set of guidelines for handling, storage, retention and destruction of any records that relate to child safety concerns. EY Foundation has appointed a Lead Designated Safeguarding Officer who is responsible for ensuring all incidents are recorded and appropriate action is taken if required.

11.2 Recording information

The Designated Safeguarding Officer for child protection will provide a form to record the concern and how it is dealt with. The relevant sections of the form should be completed and then it should be signed. It can be used to forward information to the statutory child protection authorities if a referral to them is needed.

The form should be signed and dated by all those involved in its completion and kept confidentially on the young person's file. The name of the person making the notes should be written alongside each entry. Records are kept in a secure e-folder which only Designated Safeguarding Officers have access to. The Chief Executive, or Chief Financial Officer of the EY Foundation will be notified by Designated Safeguarding Officers of any child protection concerns and any course of action to be followed, although personal details will not be disclosed. The Lead Designated Safeguarding Officer will also notify the EY Foundation Chair, Patrick Dunne, and Trustee for Child Protection, Rosehanna Chowdhury within 24 hours. They will inform the wider EY Foundation board as appropriate.

11.3 Storage

Any information collected will be stored by EY Foundation electronically in password protected or encrypted documents with sole access to the Designated Safeguarding Officers.

11.4 Accessing your personal information

You have the right to access information that EY Foundation holds about you. EY Foundation's Data Protection Officer is responsible for monitoring compliance with relevant legislation in relation to personal information. You can also contact the Privacy Officer if you have any questions about this privacy notice or

our treatment of your personal information: Please email us at enquiries@eyfoundation.ey.com

11.5 Record Retention and Disposal

EY Foundation will only retain personal information related to any safeguarding incidents until a young person reaches the age of 25 (Information and Records Management Society (IRMS), 2016) Any such information will be retained in accordance with EY Foundation retention and disposal policies. After such relevant retention period, any personal information will be destroyed in a secure manner. Exceptions may be made in cases where there are related legal proceedings. For young people that are looked after or adopted then records are subject to statutory requirements and must be kept until their 75th birthday. These records will be clearly marked with the reasons for keeping them for an extended period.

Appendix A: Safeguarding Concern Report Form

Safeguarding Concern Report Form

Safeguarding Concern Report Form	
Incident or concern reported by:	
Job title:	
Report date:	
Report summary	
Name of young person:	
Date of Birth:	
Are you reporting your own concerns or passing on those of somebody else? (If somebody else, please include their name and contact details)	
Date and time of disclosure or concern/incident reported:	
Location of disclosure or concern/incident reported:	
Give a brief account of the disclosure or concern/incident reported, including the observed harm/abuse, time, dates, names, locations, a description of any visible injuries (if any) or any other relevant facts:	
Action taken, including the name and details of anybody you have consulted:	

Signed

Date

