



# Akoma's Safeguarding Children Policy

*Last reviewed for fiscal year of 2023/2024*

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## Introduction

### About

Akoma's mission is to cultivate a global learning community for black and afro-indigenous girls. Through zines, digital learning opportunities and pop-up school, Akoma promotes educational justice for marginalized communities. In London, England where black girls are permanently excluded from school at a rate double than that of white British girls, and where more than half of black British children live in poverty, Akoma are implementing environmental education, cultural innovation and reimagined narratives. In Sao Paulo, Brazil where only 10.4% of black women have completed higher education and it is estimated that 94% of underage domestic workers are black girls, Akoma are deepening culturally sensitive education and community infrastructure. In Accra, Ghana where girls stay in school on average for four years and make up 90% of domestic workers between 5 and 17, Akoma are challenging child poverty, gender-based discrimination and access to quality education.

Akoma is committed to protecting and actively supporting children and young people so that they are able to live safe, happy and successful lives, in accordance with its duties under Section 11 (4) of the Children Act 2004 and the Working Together to Safeguard Children 2018. The policy has been written in line with this current legislation, as well as local policies.

### Purpose

This policy has been developed to safeguard and protect the welfare of children, young people and vulnerable adults that come into contact with Akoma.

### Scope

This policy is to be followed by, and affects the conduct of all, employees, contractors, trustees, volunteers and beneficiaries of Akoma. They should use this policy to understand their responsibilities, what they need to do, and what they can expect of one another to. The policy commits them to prevent risk, act promptly and appropriately whenever a concern is raised and complete ongoing reviews to strengthen safeguarding processes. It is recognised that, whilst Akoma strives to safeguard all children, young people and adults, the organisation primarily works with girls aged between 8-14 and who are particularly focused upon within this policy.

### Definition of terms

Whilst children and adults at risk may suffer abuse and neglect, the recognition of these may differ. Working Together to Safeguard Children 2018 provides guidance as to what constitutes abuse and neglect and the categories of concern; however, this is not to be treated as the definitive list, as abuse and neglect can be multi-faceted and should be considered holistically.

**Child:** A children is anyone under the age of 18

**Abuse:** Abuse is the maltreatment of a child, young person or vulnerable adult. Somebody may abuse or neglect a child, young person or vulnerable adult by inflicting harm or failing to act to prevent harm. Children, young people and vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them

or, more rarely, by others (i.e. a stranger). They may be abused by an adult or adults, or another child or children.

**Impact of abuse:** The abuse and maltreatment of children physically, emotionally, sexually or through neglect can have major long-term effects on all aspects of a child's health, development and wellbeing. The immediate and longer-term impact can include anxiety, depression, substance misuse, eating disorders and self-destructive behaviours, offending and anti-social behaviour.

**Abuse of power or trust:** A relationship of trust is one in which one party is in a position of power or influence over a younger or more vulnerable person by virtue of their work or the nature of their activity. An abuse of trust can be committed by a teacher, youth workers and volunteers or other adults. Abuse of trust or power occurs when the person of influence uses that influence for personal or financial gain causing a loss to and or abuse of the more vulnerable.

**Physical abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child so that it causes severe and persistent adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual abuse:** Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of a child's clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including via the internet or social media. Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children.

**Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Vulnerable Adult:** Anyone who is deemed at risk because of, but not limited to, their need for care and support, their experience or risk of abuse and neglect, their inability to protect themselves from abuse or neglect. They may have an illness affecting their mental or physical health, have a learning disability, suffer from substance addiction, be frail or live in poverty. It is important to note that not all those who suffer from the aspects listed will always be vulnerable in every circumstance, but it is crucial that they are treated with respect.

**Vulnerability:** The state or quality of feeling or being exposed to the possibility of being harmed or abused, either physically, emotionally, sexually or psychologically.

**Young Person:** This refers to someone who is above compulsory school age, normally 16, but below the age of 25. This definition will change depending on social norms and cultures, and relates to the person's growing ability or potential to lead a fully independent life without significant reliance or dependence on others.

## Policy Statement

Akoma fully recognises its responsibility for safeguarding and promoting the welfare of children, young people and vulnerable adults; as set out in Section 11 of the Children Act 2004 and the statutory guidance, Working Together to Safeguard Children 2018. Akoma commits to make suitable arrangements to ensure that their responsibilities are discharged in order to safeguard and promote the welfare of children, young people and vulnerable adults as per their statutory duty.

Akoma believes that children, young people and vulnerable adults have a fundamental right to be protected from harm, and thus our work will:

- Protect children from maltreatment or neglect;
- Prevent the impairment of children's health and development;
- Ensure that children grow up in circumstances consistent with the provision of safe and effective care; and
- Take action to enable all children to achieve the best outcomes.

We also believe that all those working on behalf of the charity have a right to personal support and guidance concerning the protection of children, young people and vulnerable adults and so will ensure all employees, contractors and volunteers working with children understand fully their responsibilities and duties as set out in primary legislation and the associated regulations and guidance.

Akoma has a zero-tolerance approach to bullying, harassment, sexual exploitation and abuse targeted at trustees, volunteers, children and beneficiaries.

Akoma is committed to a zero-tolerance approach to all forms of violence against children, beneficiaries, volunteers and trustees.

Akoma is committed to being a fully accessible and inclusive organisation welcoming and respecting the diversity of its staff, volunteers, members, trustees, and beneficiaries. It will not discriminate based on age, disability, gender reassignment, marriage/civil partnership, pregnancy or maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex or sexual orientation.

**Prevent:** In all our activities we will establish and maintain an environment and positive ethos where children, young people and vulnerable adults feel secure, supported and are encouraged to talk, are listened to, can participate, develop and feel valued. We will ensure that all adults representing Akoma, including volunteers, know that safeguarding children is everyone's responsibility.

Individuals within the organisation will be assisted to be aware of signs and symptoms of neglect and abuse. We will provide guidance to Akoma's employees, contractors and volunteers so that they understand what they should do to protect children and keep them safe, raising awareness of their responsibility to follow local social care procedures.

The policy will therefore ensure employees have understood the overarching Safeguarding Children Policy and how it impacts on their day-to-day operations; and a multi-disciplinary and multi-agency-working and a child-centred approach to safeguarding.

**Act:** Should a safeguarding incident be brought to the attention of an Akoma staff member or volunteer, they will take immediate and appropriate action, including reporting, as outlined in our standard operating procedures. The policy will ensure employees and contractors understand when and how to report allegations of neglect, abuse or the risk of harm to children and young people.

**Review:** Akoma will annually review this policy and regularly review processes for safeguarding. The policy will ensure learning is taken from how employees understand and implement their responsibilities so that actions and expectations of each other to safeguard and protect the welfare of children are strengthened.



## 1. Procedures for a creating an active safeguarding culture

- a. All staff, volunteers and trustees will be requested to read through and sign to say that they will adhere to this policy.
- b. All new employees receive an induction that includes the organisation's procedures for safeguarding children.
- c. All staff, volunteers and trustees will be made aware of what is acceptable and unacceptable behaviour
- d. All staff, volunteers and trustees will receive appropriate training and support, are able to recognise harm; and know how to report any concerns in a timely and appropriate way.
- e. Induction and training (1c and 1d) will be completed through safeguarding training from the Director and/or accessing a range of training through the NSPCC Learning Courses related to Child protection training and The Lewisham Safeguarding Children Board (LSCB).
- f. As a reminder and part of briefings conducted at the start of activities, all volunteers will be requested to read through and remind themselves of the policy (i.e. workshop day)
- g. The policy is available to all, accessible via the google drive, and everyone is encouraged to remind themselves of it from time to time
- h. Other relevant training and workshops particularly for those who have a designated child protection responsibility can be accessed via the Lewisham safeguarding website [here](#).

## 2. Procedures for safe recruitment and employment

There are several aspects to protecting children from working with unsuitable people. These include safe recruitment practices, procedures for dealing with allegations against employees, and guidance about appropriate behaviour.

- a. Each staff member, trustee or volunteer must undergo a clear procedure to ensure that Akoma is safeguarding its young people via safe recruitment practices. These include:
  - i. Completing an application form, see Form 1 attached to this policy
  - ii. Being interviewed to assess their suitability, see Form 2 attached to this policy
  - iii. Akoma receiving a minimum of two satisfactory references from people who have known them for more than 2 years, see Form 3 attached to this policy
  - iv. A satisfactory DBS check a minimum of 2 weeks prior to employment
- b. Any consultant, contractor or commissioned guest from other organisations providing services on behalf of Akoma will formally agree in writing to abide by the Safeguarding Children Policy, receiving appropriate training and support if needed.

- c. Akoma's commitment to zero tolerance to **all** forms of violence against children, beneficiaries and staff will be communicated to all volunteers and trustees during their recruitment.
- d. Whilst the contribution of time, finance and skills given by volunteers to Akoma is highly valued and appreciated, they will not automatically be reselected for service if there are concerns in regard to the respect and implementation of the policy statement and all procedures listed.

### 3. Procedures when working with children

- a. Relationships with the parents/guardian of the children is vital. Parent meetings must take place before a child joins Akoma's activity, and discussion at this meeting will include information to create a profile of the child and an admission welcome pack of anything the parent should know about the Akoma activity.
- b. Parental consent (via docu-sign) must be given for the participation of any child in any activity organised by Akoma, and they will confirm who will collect the child (with a photo).
  - i. If a parent needs to change the person collecting the child at the end of the activity, this must be done before the activity commences and can only be done by the named parent/guardian in the consent form.
- c. Photographs, videos and communication material collected by volunteers for personal keepsake or for promotion of Akoma can only be taken and used if explicit consent (via docu-sign) is given by the child and their parent/guardian – who know what they are being taken for and how they will be used. (For example, use on social media.)
- d. Akoma staff, trustees and volunteers should never find themselves alone with a child. If they do, the door (if inside) should remain open and/or make every effort to have another adult accompany them as quickly as possible. They should tell their Project Lead why they found themselves in that situation, how long for and what took place. This needs to be reported to the Board of Trustees.
- e. Before any activities begin, staff will brief together and reflect on possible safeguarding risks, the agenda and responsibilities for the activity, and ensure everyone knows the physical environment – including toilet and fire escape locations
- f. At the start of every activity, a register must be taken of the children present – with head counts carried out at appropriate points throughout the activity
- g. At the start of the activity, time will be taken with children to set out expectations of the day. If and when appropriate, this will include a safeguarding discussion. Children will be made aware that they are able to tell staff anything that is worrying them but the staff member will not be able to keep it a secret so that they can address the concern (i.e. will need to disclose to other adults)
- h. There must be a minimum ratio of 1 staff or volunteer per every six children
- i. Children under 11 will be escorted to the toilet by one adult. This adult will let others know what they are doing and when they return.
- j. At the end of an activity, a child will only be released to the named adult who was collecting them. If the named adult has not arrived, please see "Act section 4". Programme week – clarify who will pick-up the child, and name any other relatives; contact details/name before the day. Who not told, child not released. Contact parents

to confirm name and telephone on the spot – parent come back. If not parents, call emergency services.

## 4. Procedures for Particularly Vulnerable Children

There are some groups of children who may be particularly vulnerable because of specific concerns in relation to their safeguarding and because of some specific issues in relation to promoting their welfare. The list is not a comprehensive list of every vulnerable child, but highlights some specific groups:

- Children living away from home;
- Children who are being bullied;
- Children whose behaviour indicates a lack of parental control;
- Children who are experiencing racism;
- Children experiencing violent extremism;
- Children experiencing parental domestic violence;
- Children with families whose whereabouts are unknown;
- Children who go missing from home or care;
- Children who go missing from education;
- Children of families living in temporary accommodation;
- Migrant children; and
- Unaccompanied asylum-seeking children (UASC).

To provide additional safeguarding measures for these children, Akoma will:

- a. Ensure that the general public cannot access the space where activities are held
- b. Create a trauma sensitive environment, especially in reflection of racial tension and ensuring the children are shielded from external/extremist views whilst with Akoma
- c. Encourage conversations with parents/guardians and for them to disclose information about their child/ren that might affect their learning space and experiences with Akoma
- d. Ensure any staff/volunteer have this information on a “need to know” basis and that activities are amended accordingly to support the child

## 5. Procedures for working with others

Through multi-agency working, it is important to Akoma that our partners have knowledge of our policies and procedures, and also take safeguarding seriously. To do this we will:

- a. Share our safeguarding policy with all partners
- b. By mutual agreement, confirm standards to abide by should more than one policy be in place between partners
- c. Encourage partners to create their own safeguarding policies should they not be in place
- d. Ensure beneficiaries know their rights and responsibilities, and encouraging partners to take the lead in this work wherever possible
- e. Taru Arts (performing arts agency London borough of Greenwich)

- Not allowed to be left alone with the children, always an Akoma staff member (at least one) present with the children

## 6. Procedures for Online Safety / Social Media

Digital technology can expose children and young to new dangers and risks. **London's safeguarding children procedure CP9: Information sharing guidance** takes strategic responsibility for improving the way in which children and young people are safeguarded online.

- Employees should not engage in any form of social media communication (Face book, Twitter, Instagram, etc) with children or young people using their personal accounts. This includes using personal email accounts or mobile phones.
- Where there is a need to communicate with young people using social media, only accounts set up by Akoma should be used.
- When communicating using social media, care should be taken to ensure that the material posted or shared is safe and is appropriate. Photographs of children must be consensual and information especially that which could put a child at risk must not be shared. Appropriate security and permissions must be put in place. Material posted should not discredit the organisation in any way.
- Any posts by children or young people which raise safeguarding concerns should follow the e-safety incident procedures set out in Appendices 1 and 2. Where there are immediate concerns, call the Police on 999.

## 7. Procedures for online safety / Photography and videos:

- All company Directors, employees, contractors, and volunteers must only use Akoma authorised equipment to take photographs or videos of events which involve children and young people, and under no circumstances must they use their own personal devices.
- Consent must be obtained from parents or the legal guardians of children before they are recorded.
- They must be made aware of how and where the footage or pictures shall be used, especially if the footage is to be published in the media or online.
- An agreement as to whether the pictures and videos will be destroyed or saved for future use, where they will be stored, and who will be able to access them must also be drawn up.
- Even if parental permission has been sought, the children must be comfortable with their picture being taken.
- Children's and young peoples' names should not be publicised in photographs or videos without the express permission of the children and their parents or legal guardians.
- Photographs shall only be taken in relation to Akoma services or events. Employees shall not take photographs in one-to-one sessions unless there is a specific need to, such as using photographs to help illustrate outcomes to children, young people and

their families, this arrangement must be agreed with managers in advance and the rules around consent still apply.

- h. Staff should also be attentive to others taking photographs of children without their permission, requesting them to stop and remove photographs from their phone/camera. For significant concerns, contact the police.

## 8. Procedures for online safety / Access to inappropriate images and internet usage

- a. Viewing, creating and storing inappropriate and indecent images of children on the internet is illegal and will not be tolerated under any circumstances. Adults who retrieve and possess links to such websites and images will be regarded as a major and possible threat to children. This behaviour will result in a criminal investigation and the individual will be barred from working with children if found guilty.
- b. Adults should not use their devices equipment to access pornography, and personal equipment containing pornographic images or links to them must not be brought into the working environment. This will result in serious concerns regarding the adult's suitability to work with children.
- c. If indecent images of children or other inappropriate materials are found, the Police and Local Authority Designated Officer (LADO) must be informed immediately via the Single Point of Access
- d. Other adults must refrain from attempting to investigate or assess the material independently as this could contaminate the evidence. Employees have a duty to ensure that children do not view inappropriate images or websites. Children can only use IT equipment if the appropriate controls are in place, such as restricted internet access. Confidential information must be protected, and personal passwords must remain confidential. Additionally, parental permission must be obtained prior to a child using computer equipment and the internet.
- e. All material shown to children, including films, books, magazines, television or video, must be age appropriate.

## 9. Procedures for safe Information Sharing and Data Protection

Employees may have access to confidential information about children and young people and their families in order to help them perform their roles. They may be privy to highly sensitive and confidential information. In some circumstances, this information may need to be shared with other professionals, such as in a case of suspected neglect or abuse. In these circumstances, information must be passed on immediately.

- a. Confidential information should not be shared with someone who does not have the right to know. Where there is any uncertainty, staff should discuss this with their manager.
- b. When it is not necessary to disclose a child's identity, all information should be used anonymously. Private Information should never be used for personal gain or for

the advantage of others, including friends, family, relatives and or other organisations.

- c. The database of contact details for families will remain only with the Director
- d. The Director will create people profile/student profile for each child, and a printed copy will be shared with youth workers and returned to the Director once they have read through necessary information (i.e. child allergens)
- e. Under no circumstances should those looking at the people profile create a copy
- f. Consent from parents to hold contact information and/or information on file is part of welcome meeting, and can be revoked at any time.

## 10. Procedures for a Safe Physical Environment

- a. All premises and equipment will be assessed to ensure their safety and suitability.
- b. Akoma will follow the risk assessment procedures of the building/space that is being hired
- c. Akoma will follow the safeguarding policy of any schools or groups they work with
- d. In outdoor spaces, such as activities in a park, a higher staff:child ratio will be made and a more in-depth risk assessment documented to manage increased safeguarding risks. This policy still applies.
- e. Where appropriate, provision specifically for children will be registered with Ofsted and their guidelines will be followed. All premises and equipment should be managed in line with statutory health and safety requirements of the **Croner-I work equipment procedures**.

## 11. Procedures for Transport

Safeguarding policies apply when taking public transport – i.e. ratio of staff, consideration of risk. Some employees may be required to transport children as part of their role and all journeys must be recorded appropriately.

- a. Adults who use their own vehicles for the transportation of children, must ensure that their vehicle is fit for purpose, suitably insured and that the maximum number of passengers is not exceeded. If employees are required to transport children in a vehicle which requires a specialist license and insurance, such as a PCV or LGV, employees must hold the necessary license and insurance.
- b. Employees must ensure that they are able to drive and free from any alcohol, drugs or medicine that may impair their judgement or capability.
- c. All passengers are legally obliged to wear a seat belt and it is the employee's duty to check that this is so. Adults should also use car seats for younger children, where applicable.
- d. If only one child being transported, they should sit in the back of the vehicle.
- e. The safety and wellbeing of the children being transported is the concern of the employee until the children are safely reunited with a parent or carer. (See section Part Two 4.1)

- f. Employees must not offer lifts to children and young people outside of their agreed working responsibilities, unless approval has been sought from their manager and the child's parents or carers.
- g. Occasionally, a child may require assistance with transportation in an emergency, or there may be occasions whereby failure to transport the child will place them at greater risk. On these occasions, the senior manager and parents or carer of the child concerned must be informed and the incident recorded.

## 12. Procedures when working in Ghana or Brazil

- a. When working in Ghana or Brazil, the country-specific standard operating procedures with contextual information and contact details for embassies and local authorities applies. The country information sheet will have this information, and the local contact information for any disclosures or procedures to be followed. In Brazil, the emergency number 190 will be dialled to contact the federal police, and 192 for the ambulance. In Ghana, the emergency number 112 will be dialled to contact emergency services, including the federal police, ambulance and firefighter services. In the case of health emergencies in either Ghana or Brazil, we will use our own funding to support the child in our care. We will always carry health insurance documentation of children in case of an emergency. All volunteers and members of staff will need to show lead managers a hard copy of their health insurance during the time of their recruitment. Photocopies of these documents will be stored on site of services where we are based. In case of safeguarding concerns regarding overseas staff in these contexts, we will suspend staff members from delivering services and consult the British embassies.

## 13. Procedures to prevent the abuse of power

Akoma will not tolerate any abuse of power, harassment or bullying in the implementation of its aims.

- a. If someone feels that they have been disrespected in one of these ways, they should write to the Director or the Chair of Trustees giving as much detail of the incident as possible. (See Part three, Section 1)
- b. If a complaint is in regards to a trustee, they should seek independent legal advice or Charity's Commission (See Part three, Section 1)

### 1. Acting upon concerns about a child's behaviour

Following recognition of signs of abuse or neglect, concerns about a child may come to the attention of company Directors, employees, contractors or volunteers in a number of ways:

- Through observation of the child where a child's behaviour may indicate that it is likely that he/she is being abused;
- The child may disclose abuse;
- Information may be given by parents, other people or agencies;
- A child may show some signs of physical injury of which there seems to be no satisfactory explanation;
- Something in the behaviour of one of the workers or a child, or in the way the worker relates to a child, alerts them or makes them feel uncomfortable in some way;
- Observing one child abuse another.

There may be barriers to children telling someone that they are being harmed, neglected or abused. The power of relationships between adults and children should not be underestimated, and nor should the deliberate and skilled way that abusers target their victims. Children may not tell because they:

- Are scared because they have been threatened or are being sexually exploited;
- Believe they will be taken away from home;
- Believe that social care services are stigmatising;
- Think it is what happens to all children;
- Feel embarrassed;
- Feel guilty;
- Do not want to get the abuser into trouble;
- Have communication or learning difficulties;
- May not have the vocabulary to explain what has happened to them;
- Are afraid they won't be believed;
- Or believe they have told, possibly by dropping hints but have not been believed so that they do not bother trying again.

Child abuse thrives on secrecy and needs to be handled in a sensitive, accepting way. In order to achieve this, adults may have to overcome certain barriers also, as:

- Sometimes it may be hard to believe what the child is saying;
- It may be difficult that the suspicion may be about someone that is known;
- There is a fear of getting it wrong; the fear of what consequences there may be for 'getting it wrong' for the child, for the family and for themselves;
- They worry that it may make it worse for the child;
- They believe that social care services are stigmatising;
- They simply do not want to become involved;



- They do not have the necessary information on what to do or who to contact.

## 2. Procedures for dealing with concerns

Many concerns about children and young people arise on a day-to-day basis and, in most cases, these can be dealt with quickly and easily through discussion between employees and parents or carers where further advice or help may be offered, if needed. These discussions and actions must be recorded in the relevant children's services recording system.

Sometimes concerns can be more worrying because it is clear that the child may be affected by what is happening to them. The child may be being harmed in some way. If this is the case youth workers and volunteers should:

- a. **If a child is in immediate danger you must always telephone 999.**
  - i. Police alone have the power to remove a child immediately if protection is necessary. Do not remove the child from a situation without the permission of a parent/guardian, local authority or the police.
- b. If a child discloses something, collect as much information as possible about the situation - this may be from the child, parent, carer or other professionals and should include the date and time of the incident or disclosure, the parties that were involved, what was said or done and by whom, and any further actions. Complete Akoma's disclosure form (Form 4). Information to collect includes, but is not limited to:
  - i. Your name, telephone number, position and request the same of the person to whom you are speaking.
  - ii. Full name and address, telephone number of family, date of birth of child and/or vulnerable adult and siblings.
  - iii. Gender, ethnicity, first language, any special needs.
  - iv. Names, dates of birth and relationship of household members and any significant others.
  - v. The names of professionals known to be involved with the child/family and/or vulnerable adult e.g.: GP, Health Visitor, School.
  - vi. The nature of the concern; and foundation for the concern.
  - vii. An opinion on whether the child may need urgent action to make them safe.
  - viii. Your view of what appears to be the needs of the child and/or vulnerable adult and their family.
  - ix. Whether the consent of a parent with Parental Responsibility has been given to the referral being made.
- c. Be open about the concern and make it clear that they will have to tell others
- d. Report their concerns to the Director or a trustee immediately and at the latest within the same working day.
  - i. If in Lewisham borough, contact the Single Point of Access if the concern is of a significant sexual, physical, threatening or exploitative nature **call Monday to Friday 8am–5pm on 020 8314 7777 option 2 and speak to a duty social worker.**

- ii. **If in Southwark borough, contact the Single Point of Access: Call 0800 090 2456 or email [lambethspa@slam.nhs.uk](mailto:lambethspa@slam.nhs.uk) with a completed SPA introduction referral form**

The response to any concerns about a child are dealt with by the Director in line with the procedures set out in the core procedures of the [London Child Protection Safeguarding Children Procedures](#) updated October 2022 in the [CP2 Referral and Assessment section](#).

### 3. Procedures for managing Individuals Who Pose a Risk of Harm to Children

The Children Act 2004 recognises that the identification and investigation of child abuse, together with the protection and support of victims and their families, requires multi-agency collaboration.

**The CP2 Referral and Assessment section of the London Child Protection**

**Procedures** provide standards for agencies and a framework to promote children's welfare and protect them from abuse and neglect. Akoma's procedure in place for dealing with allegations made against any adults follows the [London Safeguarding Procedure CP7: Allegations Against Staff of Volunteers who work with Children](#).

If you receive an allegation against a member of employees who works with children that causes concern that they have behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; or behaved towards a child or children in a way that indicates they may pose a risk of harm to children, **you must**:

- a. Notify the director of Akoma who will suspend the staff, trustee or volunteer immediately
- b. With the director, contact the Local Authority Designated Officer<sup>1</sup> (LADO) via the Single Point of Access here: Multi-Agency Safeguarding Hub (MASH) team on 020 8314 6660.
- c. Notifying the Disclosure and Barring Service

The Disclosure and Barring Service (DBS) was created by the merger of the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA). This new organisation provides a service combining criminal records checking and barring functions. The barring side of the DBS provides caseworkers who process referrals about individuals who have harmed or pose a risk of harm to children and/or vulnerable groups. They make decisions about who should be placed on the children's barred list and/or adults barred list and prevent them, by law, from working with children and vulnerable groups. The checking service allows employers to access the criminal records history of people working, or seeking to work, in certain positions, especially those that involve working with children or vulnerable adults in specific circumstances.

- d. **Legal Duty to Refer:** There is a statutory duty under the Safeguarding Vulnerable Groups Act (2006) to refer any relevant information to the DBS if Achieving for Children dismisses or removes an employee from working with children in what is

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<sup>1</sup> The Local Authority Designated Officer acts on and monitor allegations against adults

legally defined as a regulated activity, because he/she meets the referral criteria. Akoma has a duty to refer information to the DBS as both a Regulated Activity Provider and on behalf of the London Boroughs of Lewisham. It is the HR Business Partner's responsibility to make the referral to the DBS following consultation and sign off by the senior manager of the service in which the employee works. Please refer to the government's [Guide for Employers and Volunteers on the legal duty to refer](#) for further information.

#### 4. Procedures for managing the risk of children being removed from safe/known environments

A named parent or guardian of a child will have been made to collect the child, transferring the responsibility of their care from Akoma back to the parent/guardian. If this does not happen:

- a. Telephone the parent to ask who will be collecting the child/ren, with name, contact number and photo of that person to be given. Speak to the parent to reiterate the importance of Akoma knowing who will collect the child/ren when the activity ends, before the activity starts.
- b. Contact the director to let them know the situation
- c. Do not hand over the child/ren to any adult who has not been confirmed as the collecting person by the parent or guardian, whoever they say they are
- d. Phone the police and/or seek child protection referral if Akoma remain with a child/ren at the end of the activity.
- e. Under no circumstances should the child remain alone with Akoma staff (2 must remain present). If it is impossible to stay at the space of the activity (i.e. rented space and so other groups are arriving), select a nearby public space to wait for the named person or police to arrive – communicating this with those who need to know.

#### 5. Procedures in a medical emergency

- a. In a medical incident, first aid can be given by trained staff and the parents/guardian should be called. Staff/volunteers should contact the director for any medical information on the child's profile and to communicate what has taken place.
- b. In a medical emergency, phone 999 and the parents/guardian as soon as possible afterwards. Staff/volunteers should contact the director for any medical information on the child's profile and to communicate what has taken place.

### 1. Procedures for review by Akoma

The responsibility of this policy is held by the Board of Trustees. At every quarterly meeting with trustees, discuss safeguarding concerns per quarter and based on concern, update the policy. Akoma will review this policy and implementation of it by monitoring allegations of neglect, abuse or harm to children and young people made against our employees to understand how and why this has happened and ensuring that appropriate systems and processes are in place to prevent this happening in the future. We will also be working with children, young people and their families to help develop, monitor and review our policies, practices, functions and services.

- a. Akoma Board of Trustees will ask the question, “Are there any safeguarding matters to raise?” at each meeting. This will be a way of keeping safeguarding policy and practice active, and addressing any issues before they become significant – and recording all actions taken in regards to safeguarding.
- b. Akoma Board will formally review this policy annually.
- c. Akoma staff are welcome to give their feedback in this review process.
- d. The board of trustees will communicate to all parties when the policy has been updated

### 2. Procedures for whistle blowing and complaints

This policy is aligned with guidance from the updated [London Child Protection Procedures, which can be accessed here.](#) In the case of our London operated programs, Information provided by the Local Safeguarding Children Boards can be accessed from the following website: <https://www.safeguardinglewisham.org.uk/lscplscplscp>

If Akoma is not acting in the way we should be, complaints allow anyone in connection to Akoma’s work, but external to it, to give their feedback.

Whistle Blowing is the process which allows employees to express their concerns without fear of the consequences. If employees use the procedure, their employment rights will remain unaffected. Employees have an individual responsibility to make their manager aware of their concerns and this is especially important where the safety or wellbeing of children is concerned.

- a. If parents/guardians and anyone external to Akoma who are receiving or providing services with them has a complaint about Akoma’s safeguarding and general operations, they are encouraged to contact the director in the first instance.
  - i. If they are unable/unwilling to speak to the Director, they are encouraged to contact the Chair of Trustees.
  - ii. If they are unable/unwilling to speak to the Chair of Trustees, they should contact the Charities’ Commission: <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

- b. If staff, volunteers or trustees would like to express their concern (whistle blow), they are encouraged to contact the Chair of Trustees in the first instance.
- i. If they are unable/unwilling to speak to the Chair of Trustees, they should contact the Charities' Commission: <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

### 3. Roles and responsibilities for implementing, monitoring and reviewing

Role	Responsibility
<b>Akoma Board of Directors</b>	Provide challenge to ensure that the Chief Executive is fulfilling his roles effectively.
<b>Local authority</b>	Ensure the safeguarding and wellbeing of all children in the London Boroughs of Lewisham and Southwark.  Promote a culture of safeguarding and the message that it is everybody's business
<b>Senior Leadership Team</b>	Ensure that all employees within their service understand and abide by the Safeguarding Children Policy: this includes ensuring that any contracted or commissioned services sign up to the policy and that it forms part of any contractual arrangements. Ensure that employees undertake training and development so that they understand how to safeguard children and young people  Ensure that all employees working on behalf of Akoma abide by the Safeguarding Children Policy
<b>Human Resources</b>	Ensure that all staff are security checked in line with Akoma Recruitment Policy
<b>All managers</b>	Ensure that all employees within their service understand and abide by the Safeguarding Children Policy; this includes ensuring that any contracted or commissioned services sign up to the policy and that it forms part of any contractual arrangements.  Ensure that employees undertake training and development so they understand how to safeguard children and young people
<b>All employees</b>	Ensure they have read and understand the Akoma Safeguarding Children Policy and that they implement the accompanying processes and procedures.

Role	Responsibility
	<p>Take personal responsibility for undertaking training and development so that they understand how to safeguard children and young people</p> <p>Communicate the Safeguarding Children Policy to children, young people and their parents.</p> <p>Inform, for those services registered with the Charity Commission, of all relevant notifications that form part of any of the regulated activities as per Akoma's registration.</p>

This policy will be reviewed in April 2023 to judge its effectiveness, or may be updated sooner in accordance with changes in legislation.

Date created	March 2023
Revised	July 2023
Signed by:	<p>Delali Kalitsi – Founder and Director of Akoma</p> <p>Eyman Osman- Trustee</p> <p>Andrea Adoamko-Trustee</p> <p>Delali Mortty-Trustee</p>
Equality Analysis completed (yes/no):	Not applicable

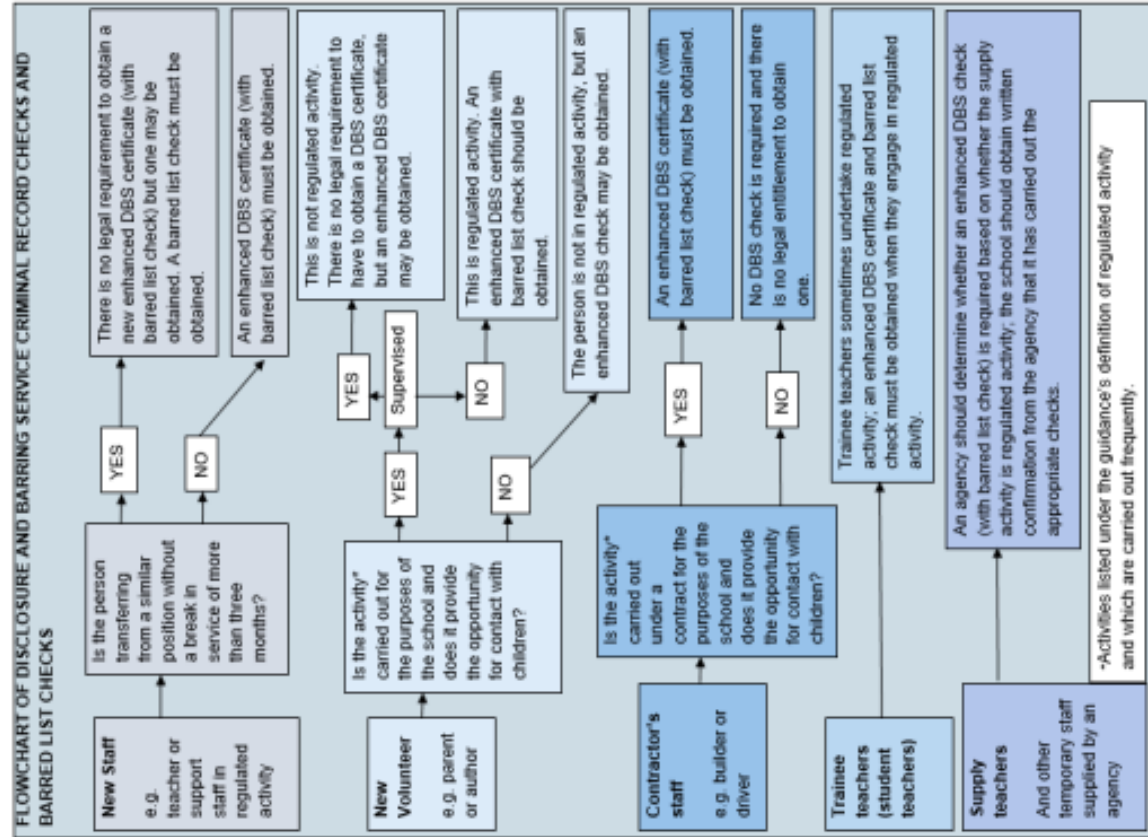
## 4. Acceptance

**I certify that I have read and understood Akoma's Safeguarding policy and will abide by it.**

**Name:**

**Signature:**

**Date:**



**Charity Commission Notifications Overview**

Regulations 12, 14, 15, 16, 17, 18, 20, 21 and 22 of the Care Quality Commission (Registration) Regulations 2009 make requirements that the details of certain incidents, events and changes that affect a service, or the people using it, are notified to CQC.

The full document can be sourced following the link below:

Any notification that identifies a service user must not contain patient identifiable information, otherwise in doing so it will contravene the Data Protection Act (1988). You can allocate a code to each person who uses your service, and use this code in statutory notifications. You must keep information about who these codes refer to safely and securely, in case we need to know more about a notified event. It is up to you to decide the format of the codes. Even where you use codes, they must not easily identify the person, such as by using their room number or date of birth.

As part of their role the registered manager is responsible for the notification to CQC of the following events that form part of the provider's statutory requirements:

<b>Statutory</b>	<b>Regulation Number</b>
Changes to a statement of purpose	12
Changes to a provider's or manager's registered details	15
Absence of a registered person for more than 28 days (or more); and also to inform CQC upon their return	14
Application to deprive a person of their liberty	18
Death of a person using the service	16
Serious injury to a person who uses the service	20
Abuse or allegations of abuse concerning a person who uses the service	18
Death of a registered provider	21
Incidents reported to or investigated by the police	18
Events that stop the service running safely and properly	18
Admission of a child or young person to an adult psychiatric ward	18
Personal representative's plans for a service following the death of a registered provider	21
Liquidator or trustee's plans for a service	22

Clinical commissioning groups (CCGs) need to notify us during the initiation of every child protection serious case review. This information may feed into our regulatory activities.



## Offences

Some of the regulations have offences attached, and as part of our enforcement action, CQC will be able to bring prosecutions if these regulations are breached. For regulations that we cannot prosecute against, we can consider using other actions as set out in our [enforcement policy](#).

CQC may prosecute breaches of the following regulations without first issuing a Warning Notice.

### Health and Social Care Act 2008 (Regulated Activities) Regulations 2014

<b>A breach of the following offences may be prosecuted directly:</b>	
<b>Regulation 11</b>	Need for consent: care and treatment may only be provided with consent.
<b>Regulation 16(3)</b>	Receiving and acting on complaints: a summary of complaints, responses, correspondence and other relevant information identified must be provided to CQC within 28 days of a request.
<b>Regulation 17(3)</b>	Good governance: a report into how the registered person is complying with the good governance requirements and their plans for improvement of services delivered must be provided to CQC within 28 days of a request.
<b>Regulation 20 (2)(a)</b>	Duty of candour: registered persons must as soon as reasonably practicable notify a service user (or person lawfully acting on their behalf) when an unintended or unexpected incident occurs. Notifiable safety incidents are explained further in Regulation 20(8) and 20(9).
<b>Regulation 20(3)</b>	Duty of candour: notifications given under Regulation 20(2)(a) must meet specific requirements.

<b>Regulation 20A</b>	Requirement as to display of performance assessments: providers must display on their website details of CQC's website, the most recent CQC rating and the date it was given. They must also display the most recent rating at each location where regulated activities are provided from and at the provider's principal place of business. Signs must be legible, conspicuously displayed and show the date the rating was given.
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A defence to all the above offences is available where the registered persons took all reasonable steps and acted with all due diligence. See Regulation 22(4).

**To be able to prosecute for the following offences, they need a further qualification, which is that the breach results in people who use services being exposed to avoidable harm or significant risk of such harm occurring or suffering a loss of money or property as a result of theft, misuse or misappropriation**

<b>Regulation 12</b>	Safe care and treatment: care and treatment must be provided safely.
<b>Regulation 13</b>	Safeguarding service users from abuse and improper treatment: sections 13(1) to 13(4).
<b>Regulation 14</b>	Meeting nutritional and hydration needs: service users' nutritional and hydration needs must be met. This applies where accommodation or an overnight stay on the premises is provided or where meeting a person's nutritional or hydration needs is part of the care and treatment arrangements.

## Care Quality Commission (Registration) Regulations 2009

A breach of the following offences may be prosecuted directly:	
<b>Regulation 12</b>	Statement of purpose.
<b>Regulation 14</b>	Notice of absence.
<b>Regulation 15</b>	Notice of changes.
<b>Regulation 16</b>	Notification of death of service user.
<b>Regulation 17</b>	Notification of death or unauthorised absence of a person who is detained or liable to be detained under the Mental Health Act 1983.
<b>Regulation 18</b>	Notification of other incidents.
<b>Regulation 19</b>	Fees etc.
<b>Regulation 20</b>	Requirements relating to termination of pregnancies.
In relation to these offences, there is no requirement for anyone to have been exposed to harm or placed at risk of harm as there is in the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014. A breach of the regulation is an offence without this further qualification.	

Guidance for providers on meeting the regulations March 2015

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For the remaining regulations included in this guidance: (Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulations 9; 10; 13(5); 13(6); 13(7); 15; 16(1); 16(2); 17(1); 17(2); 18; 19; 20(1), 20(2)(b); 20(4); 20(5); 20(6); 20(7) and Care Quality Commission (Registration) Regulations 2009, Regulations 13 and 22a), CQC can take other regulatory action.

If the evidence surrounding one of these regulations also demonstrates a breach of another regulation that is identified as an offence, then CQC may also decide to prosecute against the regulation for that other offence.