



## Somerset House Trust Safeguarding Policy

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01 March 2021

## **1. Somerset House Trust Policy Statement:**

We are committed to the safeguarding of everyone at Somerset House, particularly children and vulnerable adults. This includes acting to protect individuals from harm or maltreatment and preventing and the impairment of health or development.

Everyone, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and sexual identity, has the right to protection from abuse. We recognise the additional needs and barriers faced of individuals from: LGBTQIA+, working class backgrounds, neurodivergent, disabled, having a migrant or refugee experience, from African Diaspora, from South, East and South East Asian diaspora, and/or ethnically diverse and those with disabilities. Somerset House is committed to building a diverse and inclusive community reflecting the representation in our society.

Safeguarding is everyone's responsibility. We therefore ask all individuals associated with Somerset House, including staff, artists, residents, freelancers, contractors, volunteers and our board of trustees, to share this commitment and enact the guidance in this policy and work together to help achieve the best possible outcomes.

### **The purpose of this policy:**

- To ensure the right steps are in place to protect individuals from harm whilst involved in Trust activities, in line with current guidance and legislation. Where Trust activities are mentioned in the policy this includes both on site and online.
- To communicate the actions we have taken towards safeguarding at Somerset House, onsite and online.
- To ensure everyone is aware of their own obligations and the correct procedures to follow where required.

### **Policy Approval, Update and Review:**

As a charity, Somerset House Trust adheres to the guidance given by the Charity Commission in relation to Safeguarding.

Somerset House's Board of Trustees will:

- Appoint a Trustee to have specific responsibility for safeguarding. Currently this Trustee is Monica Monajem
- Review, approve and endorse its Safeguarding policy every three years or when legislation changes.
- Undertake ongoing monitoring to ensure that the related duties and responsibilities are being effectively implemented in practice.
- Remedy deficiencies or weaknesses in its safeguarding arrangements without delay, not just at the next policy review date.

**Approval for this policy given by:** Somerset House Board of Trustees in March 2021

**Responsibility for policy update and review:** Dhikshana Pering, Head of Engagement & Skills and Lead Designated Safeguarding Officer, Charlotte Rakhit, Head of HR, and Monica Monajem

**Next Update and Review:** March 2024 or earlier if required due to changes in legislation.

## 2. Definitions

### Child

A child, as defined in the Children's Acts, 1989 and 2004, is anyone, who has not yet reached their 18<sup>th</sup> birthday. 'Children' therefore means 'children and young people' throughout.

### Vulnerable Adult

A vulnerable adult is defined as a person aged 18 and over who is or who 'may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation'. (Definition taken from the Department of Health)

### Designated Safeguarding Officer (DSO)

The Designated Safeguarding Officer takes **lead responsibility** for safeguarding and child protection (including online safety) for Somerset House Trust. The Designated Safeguarding Officer contact list for Somerset House Trust can be found in Appendix 1.

## 3. Types and Signs of Abuse in Children and Vulnerable Adults

Is it important to be aware that abuse can take place under many different forms, therefore there are a number of different indicators to look out for. There are four main types of abuse:

- **Physical abuse**
  - The intentional causing of physical harm to a person. It could involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or fabricated and induced illness. It can happen at any time of life.
  - Some possible signs include frequent or unexplained injuries, injuries inconsistent with the person's lifestyle and subdued or changed behaviour.
- **Emotional abuse**
  - Emotional abuse can be defined as any act that has a negative impact on the emotional wellbeing of a person. It can include confinement, isolation, verbal assault, humiliation, intimidation or any other treatment which may diminish an individual's sense of identity, dignity and self-worth. In a child Emotional abuse causes severe and persistent adverse effects on the child's emotional development.
  - Some possible signs include low self-esteem, change in appetite and uncooperative or aggressive behaviour.
- **Sexual abuse**
  - Sexual abuse involving a child is forcing them to take part in sexual activities, regardless of whether or not the child is aware of what is happening. The perpetrators can be adult men and women and other children.
  - Sexual abuse involving an adult is when a person is forced or persuaded to take part in contact or non-contact sexual activities, whether they understand what is happening or not.
  - Some possible signs include bruising, unusual difficulty in sitting or walking and poor concentration.
- **Neglect**

- Neglect for a child is the persistent failure to meet a child's basic physical or psychological needs. It is likely to result in the serious impairment of the child's health or development.
- Neglect for an adult is defined as the persistent failure to meet a person's basic physical or psychological needs
- Possible signs include poor physical condition, malnutrition, untreated injuries and uncharacteristic failure to engage in social interaction.

#### 4. Procedures for protecting Children and Vulnerable Adults

- Any Trust activity involving children and/or vulnerable adults includes safeguarding in its risk assessment as standard. All Somerset House Risk Assessments have Safeguarding risk measures and controls built into them
- A list of Designated Safeguarding Officers contact details is kept up to date and easily accessible to all on this policy, saved in People HR, TEAMS and our website.
- Designated Safeguarding Officers are trained to Level 3 in Safeguarding, with refreshment training every 3 years.
- All staff are asked to read and digitally sign this policy to confirm they understand their responsibility to be alert to the signs of abuse, or inappropriate behaviour towards a child or vulnerable adult and are required to refer any concerns to the Designated Safeguarding Officer. They should be aware however that they are not trained to respond with situations of abuse or decide whether abuse has occurred, they are responsible to report only.
- Our Safeguarding policy is accessible on our website, in order for the public to understand the responsibility placed upon Somerset House Trust for child protection and adults at risk.
- We will link with relevant agencies and co-operate as required with their enquiries regarding child protection and adults at risk, including attendance at case conferences.
- Any safeguarding concerns will be recorded in writing using Disclosure or Incident Report ( Appendix 5). These will be kept confidentially and stored securely for 10 years or until the person in question is aged 65, whichever is longer, or if relating to a child until they are 25.
- If a complaint is made against a member of staff, we will investigate the complaint and take appropriate action, which could include suspension and disciplinary proceedings. Staff should refer to our internal Speak Up policy.
- Please note the Trust accepts independent visitors aged 14 and over.

#### 5. Reporting Procedures

There are some basic principles in reacting to suspicions, allegations, and/or disclosures which relate to both children and vulnerable adults:

##### Remember:

- Staff made aware of suspicions, allegations or actual abuse are responsible for taking the appropriate action according to the below procedure.
- The welfare of a child or vulnerable adult must be paramount, and you therefore have a duty to report suspicions, allegations or actual incidents to the below procedure.

##### Report:

- Report directly to a **Designated Safeguarding Officer (DSO)** or
- If you are a member of the casual staff team (particularly working out of hours) to the **Duty Manager**.
- In the absence of a Designated Safeguarding Officer or Duty Manager please contact **Security on 020 7240 9860 or ext. 2222**.

- Information should also be reported if you have concerns that a child or vulnerable adult may be suffering harm or at risk of abuse, even if you are unsure about your suspicions.
- You are obliged to disclose even if the child or vulnerable adult requests confidentially but reassure them that only those who need to know will be made aware.
- It is not for staff to decide whether a suspicion or allegation is true. All suspicions or allegations must be taken seriously and dealt with according to this procedure.

#### **What to do when reporting an incident:**

- Use the Disclosure or Incident Report (Appendix 5) to support you to capture all the information needed.
- Staff should never try to deal with a suspicion, allegation or actual incident of abuse by themselves, however it is your responsibility to make sure that the incident is acknowledged by the **Designated Safeguarding Officer/Duty Manager**.
- The incident should be disclosed **immediately** to a **Designated Safeguarding Officer/Duty Manager**. If you do not receive an immediate response via phone and email please try another **Designated Safeguarding Officer** on the list.
- Once the incident has been acknowledged by the **Designated Safeguarding Officer/Duty Manager, they** are then responsible for dealing with allegations or suspicions of abuse by consulting with the relevant statutory agencies.
- If the incident has not been received by the Lead or Deputy Designated Safeguarding Officer, they must be updated and brought up to speed at the earliest moment
- The Lead or Deputy Designated Safeguarding Officer will record the report in the Safeguarding log that is security protected using the information provided on the Disclosure Reporting form.
- Care will be taken to ensure that confidentiality for those involved in an incident and staff is maintained and that information is handled and disseminated on a need-to-know basis only, in line with the prevailing data protection regulation. Individuals must be confident that information held about them by Somerset House will only be disclosed to others either with their consent or when there is a legal duty to do so, or there is serious concern for wellbeing.
- All records will be kept confidentially and securely for 10 years or until the person in question is aged 65, whichever is longer, or if relating to a child until they are 25. Records will be accessible only to HR, Lead Designated Safeguarding Officer and Deputy Designated Safeguarding Officer.

## 6. Reporting suspected, alleged, or actual incidents of abuse- Dos and Don'ts

Before looking at the relevant reporting structures please look at this 'things to consider' list.

Dos	DON'Ts
<ul style="list-style-type: none"><li>• Consult immediately with the Designated Safeguarding Officer</li><li>• Be accessible and receptive</li><li>• Listen carefully, only asking questions for clarification</li><li>• Take it seriously</li><li>• Reassure the child/vulnerable adult they are right to tell</li><li>• Explain what will happen next</li><li>• Remember Data Protection Act is not a barrier</li></ul>	<ul style="list-style-type: none"><li>• React strongly or make personal remarks</li><li>• Jump to conclusions especially about the abuser</li><li>• Speculate or accuse anybody</li><li>• Tell the child/vulnerable adult you will keep their secret</li><li>• Ask leading questions</li><li>• Make promises you cannot keep</li><li>• Stop a child/vulnerable adult who is speaking freely</li></ul>

## 7. Reporting suspected, alleged, or actual incidents of abuse- Key Contacts

**For concerns about Children (Under 18) and Care leavers (up to 25):**

- **Westminster Access Team:**
  - Multi-Agency Safeguarding Hub: 020 7641 4000
  - Out of hours ring: 020 7641 6000
  - Email: [AccesstoChildrensServices@westminster.gov.uk](mailto:AccesstoChildrensServices@westminster.gov.uk)
  - More info here <https://www.rbkc.gov.uk/lscb/information-professionals-and-volunteers/multi-agency-safeguarding-hub-mash>

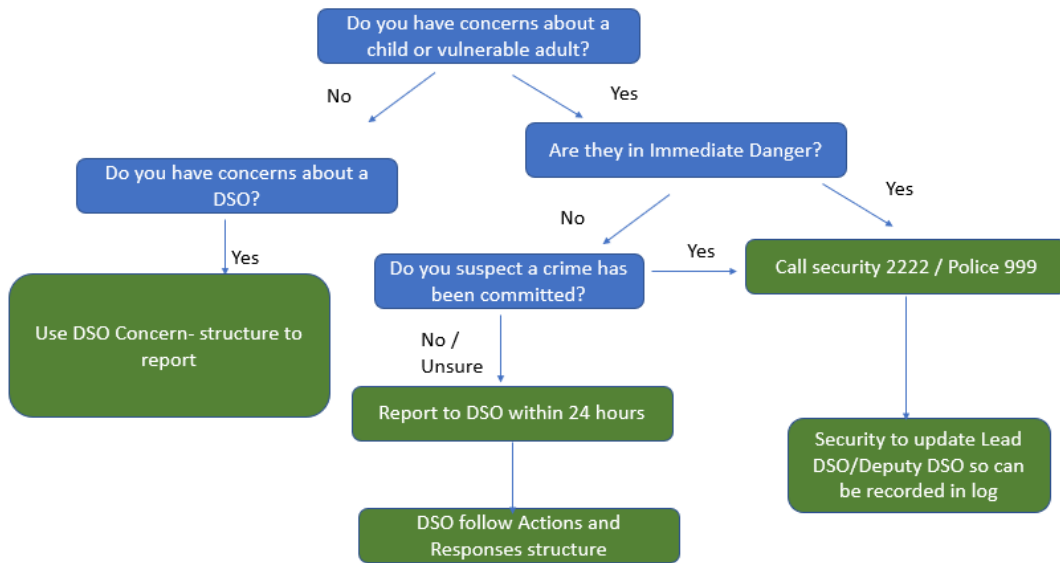
**For concerns about Vulnerable Adults**

- **Safeguarding Adults Team:**
  - Safeguarding helpline: 020 7641 2176
  - Email: [adultsocialcare@westminster.gov.uk](mailto:adultsocialcare@westminster.gov.uk)

**For Concerns about a Staff member**

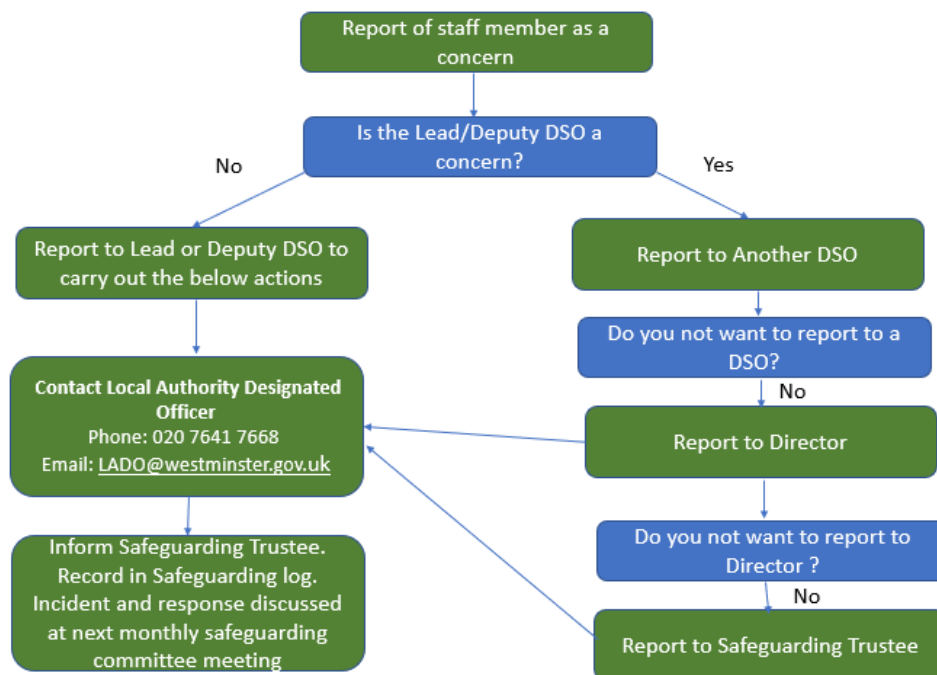
- Contact Local Authority Designated Officer and Safeguarding Trustee
- **Contact Local Authority Designated Officer**
  - Phone: 020 7641 7668
  - Email: [LADO@westminster.gov.uk](mailto:LADO@westminster.gov.uk)
- [Safeguarding Trustee details \(Appendix 1\)](#)

**8. Reporting suspected, alleged, or actual incidents of abuse- Structure for Children and Vulnerable Adults - External**

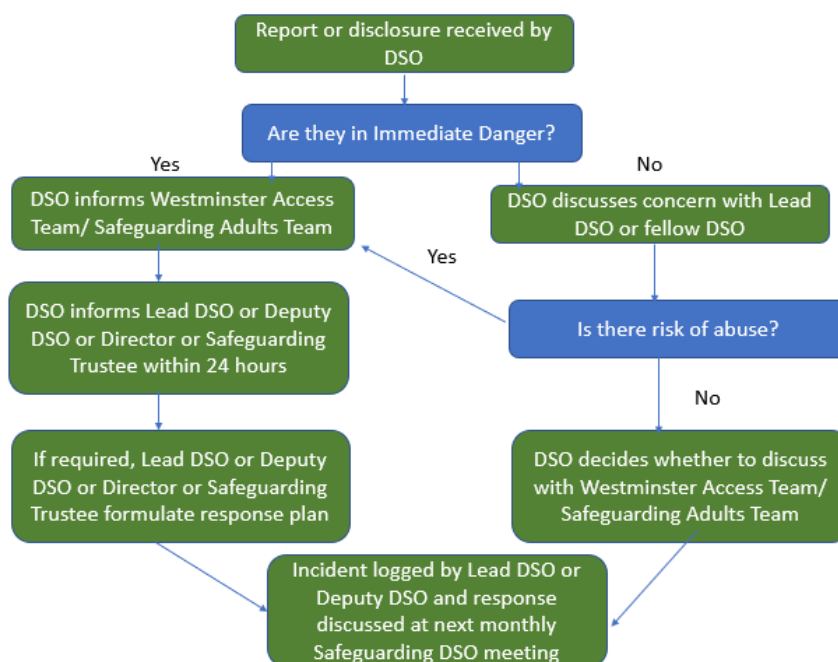


**9. Reporting suspected, alleged, or actual incidents of abuse- Structure for Vulnerable Adults – Internal**

If you have a concern about a staff member in regards to safeguarding please follow the below structure



## 10. Response structure for Designated Safeguarding Officer



## 11. Statutory Child and Vulnerable Adults Protection Procedures

What happens next is the responsibility of the relevant statutory agency, usually Social Services. If there is enough information the suspicion, allegation or actual incident may be dealt with quickly with few complications, or it may lead to thorough checks with several other organisations and possibly a child protection or adult at risk conference.

Conferences involve the parents/carers and sometimes the child or vulnerable adult as well. Decisions about what will happen next are made at the conference.

If a child protection or adult at risk conference is needed the person who has made the initial report would only be contacted if further information is required. It is not usual practice for the relevant statutory agency to feedback developments.

If you want to know more about the steps taken by the relevant agency after a report is submitted please read Working Together 2018 for child protection cases and Safeguarding Adults National Framework for vulnerable adult cases.

## 12. Staff Recruitment, Training and Vetting

All staff must:

- Undertake any training (including induction training) relating to safeguarding which Somerset House requires you to undertake in accordance with and as appropriate to your role and responsibilities.
- Read and digitally sign the Safeguarding Policy (this document) to confirm your understanding and commitment to this policy. If you have any questions speak to the Lead or Deputy Designated Safeguarding Officer.



- Partake in a background, or DBS (Disclosure and Barring Service) check, as required to the level relevant to your role – dependent on amount of work in contact with children and vulnerable adults. Costs of this process will be covered by the Somerset House. If a member of staff declines to obtain a DBS check where required for a role, they will not be able to participate in work that may put them into contact with children or vulnerable adults. Where crucial to the role, this may result in an offer of employment being withdrawn.
- In carrying out responsibilities under this policy individuals may also need to consider a range of other policies and documents that Somerset House has in place (see section 13).
- Support and training will be provided to ensure that this policy is implemented effectively. A breach of policy may result in disciplinary or other further action – up to and including referral to the relevant authorities for criminal investigation.

### **13. Staff Guidelines:**

Those staff working directly with children and/or vulnerable adults should observe the following guidelines:

- For all activities involving children and/or vulnerable adults at least one member of staff should lead on child and/or vulnerable adults protection and safeguarding. This includes ensuring awareness of this policy and its guidelines amongst other staff, contractors, freelancers, external facilitators accompanying education/further education staff, parents, carers and children.
- Where staff are likely to engage with a child on a one-to-one basis it is imperative they are trained to Level 3 in Safeguarding Everyone.
- In line with our Safer Recruitment commitment under our Recruitment policy, all employees working for the Trust are subject to pre-employment checks and all staff who are working with children and/or vulnerable adults must have the appropriate DBS checks in place.
- Risk assessments must be undertaken by each department, including safeguarding risks. Any concerns about an event's safeguarding must be raised with a Deputy Designated Safeguarding Officer immediately.
- Where an activity or event involves an external partnership but takes place onsite or is Trust led, all parties involved need to observe the policy guidelines.
- The policy applies to all Trust-led activities whether they take place on-site, off-site, online or through social media.
- Any queries or concerns about the guidelines whilst planning an activity involving children and/ or vulnerable adults should be brought to the attention of a Deputy Designated Safeguarding Officer immediately.

## **14. Complementary Policies and Procedures**

This policy should be read alongside our policies and procedures including:

In this policy:

1. Safeguarding Procedure and Guidance for delivering online activity at Somerset House (attached as Appendix 2)

On our website:

1. [Film and photography](#)
2. [Education group booking terms and conditions](#)
3. Safe Space policy (accessible on [Diversity page](#) of our website)

Internal policies – accessible to staff on People HR and/or Teams:

1. Recruitment policy
2. Code of Contact (signed by all staff on joining)
3. Lost child procedure
4. Health and Safety policy
5. Speak Up policy

## **Appendix 1**

### **Contact for Designated Safeguarding Officers and role description**

Where urgent please contact Security on 020 7240 9860

### **Role of the Designated Safeguarding Officer**

Designated Safeguarding Officers are the first point of contact for all staff and volunteers to go to for advice if they are concerned about a child or adult at risk of abuse.

It is not the responsibility of the Designated Safeguarding Officer to decide whether a child or adult at risk has been abused or not- that is the responsibility of investigative statutory agencies such as the Local Safeguarding Board, Safeguarding Adults Team or the police. However, it is everybody's role to make sure we are acting upon anything that is cause for concern, as explained in our Safeguarding Policy.

Responsibilities as a Designated Safeguarding Officer are:

1. Promoting a safe environment for all at Somerset House, especially taking into consideration children and vulnerable adults at risk.
2. Being the first point of contact for anyone with concerns around safeguarding.
3. Ensuring all safeguarding concerns are logged and stored securely
4. Reporting all cases of suspected abuse through the applied reporting structure to the relevant authority – more detail on this can be found in the Safeguarding Policy
5. Acting as a source of support, advice and expertise to staff on matters of safeguarding.
6. Being trained to Level 3 in Safeguarding and seeking to maintain and enhance your knowledge where possible, sharing resources and information with other Designated Safeguarding Officers.
7. Participating in the review of Somerset House's Safeguarding Policy every two years, ensuring it is kept up to date with current legislation and best practise.
8. Ensuring that Somerset House is complying with safer recruitment procedures (noted in our Recruitment Policy) for new staff members, alongside the HR team.
9. Knowing the contact details for relevant statutory agencies to be contacted in the case of a safeguarding incident (listed in the Safeguarding Policy).
10. Alongside the senior management committee and Board of Trustees, ensuring that the organisation's safeguarding policy and related policies and procedures are communicated, followed and regularly updated.
11. Meeting quarterly with fellow Designated Safeguarding Officers to share learnings, reflect on our procedures, forward plan, and ensure clear accountability for those with safeguarding responsibilities.

## Appendix 2

### Safeguarding Procedure and Guidance for delivering online activity at Somerset House

This procedure refers to the following activity:

- Non-interactive livestreaming, such as live streaming video or webinars where participant video/audio is not enabled.
- Interactive livestreaming where video/audio participation is enabled, such as small group work sessions, meetings or workshops.
- Pre-recorded information shared via video.

#### Staff responsibilities

##### Prior to running a session, the lead member of staff should:

1. Familiarise themselves with the Somerset House Safeguarding Policy and procedures.
2. Ensure they have the contact details of the Designated Safeguarding Officers.
3. Ensure they are using an institutional account (not a personal account).
4. Ensure that all staff supervising the activity are familiar with the platform and understand how participants will be using it, including privacy settings and how to report offensive or abusive content.
5. Ensure participants or speakers are advised in advance if a session will be recorded.
6. Plan the structure and content of the activity carefully to ensure that discussions remain on topic and that content is appropriate for participants who are under 18.
7. Ensure participants do not respond to contact requests from people they do not know and that they understand who they should contact if they hear anything upsetting or inappropriate.
8. Ensure that participants know they can contact you via email (if a participant wants to disclose something about the home environment, they may not have the privacy to do this via a call).

##### During a live session, the lead member of staff should:

- At the start of the session, remind participants about general expectations of behaviour in addition to reminding them of the ground rules. This includes:
  - Not sharing any personal details, such as birthdays, home addresses, bank details, passwords, login information, (even if inadvertently) and understanding that this will need to be reported to the IT Helpdesk if a breach does occur (email - [it.helpdesk@somersethouse.org.uk](mailto:it.helpdesk@somersethouse.org.uk) )
  - Encourage participants to have their cameras on at appropriate points during the session (with the background blurred or using a background template).
  - Remind participants not to take photographs of the screens or share any images of the online session without prior consent from the lead facilitator/staff member.

- Challenging behaviour or inappropriate comments should be dealt with immediately by contacting the lead facilitator/staff member who may remove the perpetrator from the call.
- If the virtual platform being used is hacked/bombed by an external person, the member of staff is responsible for ending the session immediately and rescheduling the meeting.
- Staff should avoid being in a private video call on their own with a young person unless they have DBS clearance. If this happens by accident (someone else loses signal etc.) they should immediately come out of the breakout room/chat and end the session, explaining to the participant why you need to do this.

#### **General Staff and Participant expectations of behaviours during a session**

- When using cameras, the background should be blurred or a template should be used. Be mindful of your surroundings and use an appropriate room for video calling. Preferably this would be a communal living space or a designated workspace and not a bedroom. Video calls should not be carried out from a bedroom unless the background is concealed.
- When on a video call you must wear suitable clothing, as should anyone else in the household whilst the call is taking place.
- Language must always be professional and appropriate, including other members of your household that may pass in the background.
- If a video call is to be recorded, all participants must be notified at the start of the session.
- Photographs or screenshots of a video call must only be taken with verbal consent.
- If screens are shared at any point, the individual must ensure that all extraneous tabs or browsers have been shut down.

### Appendix 3

For further advice and guidance please see the contacts below:

- **Westminster Children's Service**  
020 7641 4000  
[AccesstoChildrensServices@westminster.gov.uk](mailto:AccesstoChildrensServices@westminster.gov.uk)
- **Westminster Social Services Emergency Duty Team**  
020 7641 2388
- **Westminster Social Services Safeguarding helpline**  
0207 641 2176 / 020 7641 14444 / 020 7641 1175 OR
- **Westminster Social Services Emergency Duty Team**  
(Outside office hours which are 09.00-17.00 Mon- Fri)  
0207 641 2388
- **NSPCC Child Protection Helpline**  
0808 800 5000  
Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- **Pan-London Safeguarding Board**  
<https://www.londonscb.gov.uk/>
- **Childline**  
0800 1111 [www.childline.org.uk](http://www.childline.org.uk)
- **Age UK**  
0800 678 1602
- **London Lesbian & Gay Switchboard**  
0300 330 0630
- **Family Lives**  
0808 800 2222
- **Victim Support**  
08 08 16 89 111
- <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

## **Appendix 4**

### **Legislation**

This policy has been drawn up on the basis of law and guidance that seeks to protect children and vulnerable adults.

#### **Key Legislation for reference:**

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Safeguarding Vulnerable Groups Act 2006
- Children (Leaving Care) Act 2000
- Working Together 2018
- Care Act 2014
- Safeguarding Adults National Framework

#### **Additional Legislation for reference:**

- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Education Act 2002
- Digital Economy Act 2017
- Adoption and Children Act 2002
- Female Genital Mutilation Act 2003
- Children and Adoption Act 2006
- Children and Young Persons Act 2008
- Borders, Citizenship and Immigration Act 2009
- Apprenticeships, Skills, Children and Learning Act 2009
- Education Act 2011
- Working Together to Safeguard Children 2018

Appendix 5



## SAFEGUARDING DISCLOSURE OR INCIDENT REPORT

Please complete this form with as much information as you can and return as soon as possible to one of our Designated Safeguarding Officers, Lead Designated Safeguarding Officer or Deputy Designated Safeguarding Officer within 24 hours of the incident or disclosure.

DO NOT delay in completing and sending this form in order to try to collect more information. Further information can be provided subsequently where appropriate.

Please see the Somerset House Safeguarding Policy for more details on reporting a concern.

If you need any advice please speak to either the Lead Designated Safeguarding Officer or Deputy Designated Safeguarding Officer using the contact details in Appendix 1, or if you have any concerns over immediate risk of harm, contact the police.

Details of person reporting incident or concerns	
Name	
Address	
Contact number(s)	
Email	
Name of organisation	
Your role	

Details of person at risk				
Is the person	A child (under 18)	YES/NO	A vulnerable adult	YES/NO
Name				
Date of Birth				
Gender	Male	Female	Non-binary	Another description (please state)
Is there any information about the person that	e.g. disability, first language...			





Names and details of any witnesses (including ages if children)
Did you speak to the person at risk? If so please provide their account (do not interpret information – use the same language that was used by them).
Any other relevant information

\* Attach a separate sheet if more space is required

Details of actions taken	
Who was this reported to and when?	
Have you shared your concerns with anyone else?	
Please provide details of any actions taken to date	

Designated Safeguarding Officer reported to:	
Name and Job title:	
Signature:	
Date reported:	