NEW BEGINNINGS FOUNDATION

POLICIES AND PROCEDURES



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# Safeguarding Adults Policy Statement

**Date reviewed** 12/12/2023

**Due to be reviewed** 12/12/2024

This policy will enable New Beginnings to demonstrate its commitment to keeping vulnerable adults with whom it works alongside safe. New Beginnings acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

It is important to have the safeguarding policy and procedures in place so that contracted staff, volunteers, service users and carers, and the management committee can work to prevent abuse and know what to do in the event of abuse.

The Policy Statement and Procedures have been drawn up in order to enable New Beginnings to:

* promote good practice and work in a way that can prevent harm, abuse and coercion occurring.
* to ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported.
* and to stop that abuse occurring.

The Policy and Procedures relate to the safeguarding of vulnerable adults. Vulnerable adults are defined as:

* has needs for care and support (whether or not the local authority is meeting any of those needs)
* is experiencing, or at risk of, abuse or neglect
* as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

(Chapter 14 of the Care and Support Statutory Guidance (2023) for more information follow this link: https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1)

The policy applies to all contracted staff, including senior managers, management committee members, contracted staff, volunteers, sessional workers, agency staff, students and anyone working on behalf of New Beginnings.

It is acknowledged that significant numbers of vulnerable adults are abused and it is important to recognise that New Beginnings has a Safeguarding Adults Policy, and a set of procedures to follow and put in place preventative measures to try and reduce those numbers.

In order to implement the policy, New Beginnings will work:

* to promote the freedom and dignity of the person who has or is experiencing abuse
* to promote the rights of all people to live free from abuse and coercion
* to ensure the safety and well-being of people who do not have the capacity to decide how they want to respond to abuse that they are experiencing
* to manage services in a way which promotes safety and prevents abuse
* recruit staff and volunteers safely, ensuring all necessary checks are made
* provide effective management for staff and volunteers through supervision, support and training

**New Beginnings:**

* will ensure that all board members, staff, sessional workers, volunteers, peer mentors and carers/families are familiar with this policy and procedures
* will ensure that all staff and volunteers will have weekly group meetings and monthly 1:1 supervision
* will ensure that students placed with New Beginnings will attend weekly group meetings and weekly 1:1 supervision with their allocated practice educator
* will work with other agencies within the framework of the Stockport Safeguarding Adults Board Policy and Procedures, issued under Chapter 14 of the Care and Support Statutory Guidance (2023).
* will act within its confidentiality policy and will usually gain permission from parents before sharing information about them with another agency
* will pass information to Adult Social Care when more than one person is at risk. For example: if the concerns relate to a worker, volunteer or organisation who provides a service to vulnerable adults or children
* will inform parents that where a person is in danger, a child is at risk or a crime has been committed then a decision may be taken to pass information to another agency without the service user’s consent
* will make a referral to the Adult Social Care Direct team as appropriate
* will endeavour to keep up to date with national developments relating to preventing abuse and welfare of adults
* will ensure that the Designated Safeguarding Officer understands his/her responsibility to refer incidents of adult abuse to the relevant statutory agencies (Police/Adult and Culture Services Directorate)

The Designated Safeguarding Officer Person for Safeguarding Adults in New Beginnings is:

Jadwiga Leigh,

Chief Executive Officer

Tel: 07584434537

Email: jadwiga@nbfoundation.co.uk

Jadwiga Leigh should be contacted for support and advice on implementing this policy and procedures.

This policy should be read in conjunction with the Stockport’s Multi-Agency Safeguarding Adults Policy and Procedures documents which are available at: <http://www.safeguardingadultsinstockport.org.uk>

# Safeguarding Adults Procedures

**Introduction**

New Beginnings is a programme provided to families who are already in receipt of support from Stockport Social Care. These procedures have been designed to ensure the welfare and protection of any adult who accesses services provided by New Beginnings. The procedures recognise that adult abuse can be a difficult subject for workers to deal with. New Beginnings is committed to the belief that the protection of vulnerable adults from harm and abuse is everybody’s responsibility and the aim of these procedures is to ensure that all managers, trustees of the organisation, staff and volunteers act appropriately in response to any concern around adult abuse.

**Preventing abuse**

New Beginnings is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and that all those involved within New Beginningswill be treated with respect.

Therefore, this policy needs to be read in conjunction with the following policies:

* Safeguarding Children
* Complaints
* Data Protection
* Lone Working
* Conflict Resolution

New Beginnings is committed to safer recruitment policies and practices for paid staff, trustees and volunteers. This may include DBS disclosures for staff and volunteers, ensuring references are taken up and adequate training on Safeguarding Adults is provided for staff and volunteers.

Board of Trustee members will be required to provide two references and where appropriate have a Disclosure & Barring Service disclosure. New Beginnings will work within the current legal framework for reporting staff or volunteers that are abusers.

Parents will be encouraged to become involved with the running of the organisation. Information will be available about abuse and the complaints policy and Safeguarding Adults policy statement will be available to parents and their carers/families.

**Recognising the signs and symptoms of abuse**

New Beginnings is committed to ensuring that contracted staff and volunteers read the policies and procedures to gain a basic awareness of signs and symptoms of abuse.

“Abuse is a violation of an individual’s human and civil rights by any other person or persons” (No Secrets: Department of Health, 2000)

**Abuse includes:**

**Physical abuse:** including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint

**Sexual abuse**: including rape, indecent assault, inappropriate touching, exposure to pornographic material

**Psychological or emotional abuse:** including belittling, name calling, threats of harm, intimidation, isolation

**Financial or material abuse:** including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits

**Neglect and acts of omission:** including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs

**Discriminatory abuse**: including racist, sexist, that based on a person’s disability and other forms of harassment, slurs or similar treatment

**Institutional or organisational:** including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment

Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts. People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, staff members, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

**Designated Safeguarding Officer for Safeguarding Adults**

New Beginnings has an appointed individual who is responsible for dealing with any Safeguarding Adults concerns. In their absence, a deputy will be available for workers to consult with. The Designated Safeguarding Officer (s) for Safeguarding Adults within New Beginnings is:

Designated Safeguarding Officer

Jadwiga Leigh email: jadwiga@nbfoundation.co.uk tel: 07584434537

Name of Deputy Designated Safeguarding Officer

Matthew Purves email: matthew@nbfoundation.co.uk tel: 07800 618457

*Should either of these named people be unavailable then you should contact Adult Social Care Direct directly. See below for contact details.*

The roles and responsibilities of the named person(s) are:

* to ensure that all staff including volunteers are aware of what they should do and who they should go to if they have concerns that a vulnerable adult may be experiencing or has experienced abuse or neglect.
* to ensure that concerns are acted on, clearly recorded and referred to an Adult Social Care Direct team or to the allocated social worker/care manager where necessary.
* to follow up any referrals and ensure the issues have been addressed.
* consider any recommendations from the Safeguarding Adults process
* to reinforce the utmost need for confidentiality and to ensure that staff and volunteers are adhering to good practice with regard to confidentiality and security. This is because it is around the time that a person starts to challenge abuse that the risks of increasing intensity of abuse are greatest.
* to ensure that staff and volunteers working directly with service users who have experienced abuse, or who are experiencing abuse, are well supported and receive appropriate supervision.
* if appropriate staff or volunteers will be given support and afforded protection if necessary under the Public Interest Disclosure Act 1998: they will be dealt with in a fair and equitable manner and they will be kept informed of any action that has been taken and its outcome

**Responding to people who have experienced or are experiencing abuse**

New Beginnings recognises that it has a duty to act on reports, or suspicions of abuse or neglect. It also acknowledges that taking action in cases of adult abuse is never easy.

How to respond if you receive an allegation:

* Reassure the person concerned
* Listen to what they are saying
* Record what you have been told/witnessed as soon as possible
* Remain calm and do not show shock or disbelief
* Tell them that the information will be treated seriously
* Don’t start to investigate or ask detailed or probing questions
* Don’t promise to keep it a secret

If you witness abuse or abuse has just taken place the priorities will be:

* To call an ambulance if required
* To call the police if a crime has been committed
* To preserve evidence
* To keep yourself, staff, volunteers and service users safe
* To inform the Designated Safeguarding Officer in your organisation
* To record what happened in the provided documentation.

All situations of abuse or alleged abuse will be discussed with the Designated Safeguarding Officer or their deputy. If a staff member or a volunteer feels unable to raise this concern with the Designated Safeguarding Officer or their deputy then concerns can be raised directly with Adult Social Care Direct. The alleged victim will be told that this will happen. This stage is called the alert.

If it is appropriate and there is consent from the individual, or there is a good reason to override consent, such as risk to others, a referral (alert) will be made to Adult Social Care Direct team.

If the individual experiencing abuse does not have capacity to consent a referral will be made without that person’s consent, in their best interests. The Designated Safeguarding Officer may take advice at the above stage from Adult Social Care Direct and/or the Safeguarding Adults Unit and/or other advice giving organisations such as Police.

Safeguarding Adults Unit

Phone: 0161 217 6029

Available: Monday-Friday 8am-6pm

Out of hours service

Phone:  0161 718 2118

Stockport Police

Phone: 999 for immediate danger or 101 for all other crimes.

**Procedure for reporting concerns**:

Suspected or actual abuse

Immediate threat or crime committed?

Contact Police or Emergency Services

Alert made to Adult Social Care Direct via telephone and then using SAMA1 form

Contact Stockport Adults Safeguarding Team to make a referral

Inform the Designated Safeguarding Officer

A Safeguarding Adults Manager (a Team Manager from Adult and Culture Services) will then decide if the safeguarding process should be instigated or if other support/services are appropriate. Feedback will be given to the person who raised the safeguarding adults alert.

The Designated Safeguarding Officer will have an overview of this process so they can explain it to the person concerned and offer all relevant support to the person and process. This could be practical support e.g. providing a venue, or information and reports and emotional support.

Information should be provided to the individual. This could be about other sources of help or information that could enable them to decide what to do about their experience, enable them to recover from their experience and enable them to seek justice.

**Managing allegation made against member of staff or volunteer**

New Beginnings will ensure that any allegations made against members of staff and volunteers will be dealt with swiftly.

Where a member of staff/volunteer is thought to have committed a criminal offence the police will be informed. If a crime has been witnessed the police should be contacted immediately.

The safety of the individual(s) concerned is paramount. A risk assessment must be undertaken immediately to assess the level of risk to all service users posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the service whilst the investigation is undertaken.

The Designated Safeguarding Officer will liaise with Adult Social Care Direct to discuss the best course of action and to ensure that the New Beginnings’ disciplinary procedures are coordinated with any other enquiries taking place as part of the ongoing management of the allegation.

If the designated safeguarding officer, Jadwiga Leigh, is the subject of the suspicion/allegation, the concern must be made to Complex Safeguarding Team, Stockport Family 0161 4756847 who will refer the allegation to the Local Authority Designated Officer (LADO) of Children’s Social Care.

New Beginnings has a complaints policy and contracted staff and volunteers are aware of this policy. Staff will be supported to use this policy.

**Recording and managing confidential information**

New Beginnings is committed to maintaining confidentiality wherever possible and information around Safeguarding Adults issues should be shared only with those who need to know. For further information, please see New Beginningsconfidentiality policy.

All allegations/concerns should be recorded in the relevant documentation (see below). The information should be factual and not based on opinions, record what the person tells you, what you have seen and witnesses if appropriate.

The information that is recorded will be kept secure and will comply with data protection.

This information will be scanned and stored onto a password locked computer. Access to this information will be restricted to the Designated Named Person.

**Disseminating/Reviewing policy and procedures**

This Safeguarding Adults Policy and Procedure will be clearly communicated to all contracted staff, volunteers, service users, parents and carers. The Designated Safeguarding Officer will be responsible for ensuring that this is done.

The Safeguarding Adults Policy and Procedures will be reviewed annually. The Designated Safeguarding Officer will also ensure that any changes are clearly communicated to staff, trustees and volunteers. It may be appropriate to involve service users in the review and service users and parents/carers need to be informed of any significant changes.

# Safeguarding Adults Multi-agency Alert Form

**Appendix 1**

**Safeguarding Adults Multi-agency Alert Form**

**This form is to be used to notify the Safeguarding Adults Team.**

**Phone: 0161 217 6029**

**Available: Monday-Friday 8am-6pm**

**Out of hours service**

**Phone:  0161 718 2118**

**Out of hours service**

**Phone:  0161 718 2118**

|  |
| --- |
| **Person completing the form:** **Organisation Name:** **Phone contact details:** **Date of Notification to Adult Social Care Direct:** |

|  |
| --- |
| **Details of incident/suspected or actual abuse****To be completed by the manager or lead officer within the organisation responsible for safeguarding adults** |
| **Date of alleged incident/harm:****Time of alleged incident/harm:** | **Area where incident/harm took place:****Who reported the alert:****Date:** |
| **Who was involved:** |  |
| **Details of Alleged Victim****Name:****Address:****Date of Birth:****Phone:** | **Name and address of GP:****Ethnic Origin:****Nature of alleged victims’ vulnerability:****Any other details** (e.g. communication needs)**:** |
| **Details of Alleged Perpetrator****Name:****Address:****Date of Birth:****Phone Contact:****If the alleged perpetrator is a staff member please provide staff details** (E.g. job role, employer, address of place of work) | **Ethnic Origin:****Relationship to victim:****Are they a vulnerable adult? Yes/No****Alleged perpetrators vulnerability** (if applicable)**:****Any other details:** |
| **Have you made the victim aware that details of the incident are being recorded and will be investigated:** **Yes/No** |
| **If not, why not?** |
| **Type of Abuse** (Please tick one or more)

|  |
| --- |
| **✓** |
| **Sexual** |  | **Physical** |  |
| **Emotional**  |  | **Neglect or omission** |  |
| **Psychological**  |  | **Financial/Material** |  |
| **Discriminatory Abuse** |  | **Institutional**  |  |
| **Other i.e. suspicious death of a service user** |  |

 |
| **Description of alleged incident /** **alleged harm, detailing all people involved including witnesses**On this page please give a detailed description of the incident (please include times) and any other comments you feel are relevant. If necessary attach further pages. |
| **What action did you take immediately after the incident/allegation of harm**(E.g. administered first aid, asked perpetrator to leave, took victim to secure area) |
| **Were the Police called: Yes / No** | **Were any other emergency services called:** If yes, which service(s)? **Yes / No**  |
| **Names and badge numbers of Police**: | **Outcome**: (Response time, taken to hospital etc) |
| **Are there any other Agencies involved?** **Yes/No** | **Please provide details of agencies:**  |
| **Are there any capacity issues?****Yes/ No** | **Please provide details:** |
| **Has the victim made any previous referrals/alerts? Yes/No** | **Please provide details** (e.g. dates, type of abuse)**:**  |
| **Is the victim in immediate danger of further abuse? Yes/No** | **Have any immediate actions been identified to reduce the potential for further abuse? Yes/No** |
| **Has an initial assessment been made to determine further potential risk to the victim? Yes/No** | **What actions have been taken to reduce the potential for further abuse?** |
| **Are there any risks to others? Yes/No**(Vulnerable adults, children) | **Please provide details** (include who this information has been shared with – e.g. Children’s Social Care, Police)**:** |
| **Signed:** | **Date:****Time:** |
| **This form must be sent to the Safeguarding Adults Team or allocated social worker within 24 hours of the suspected or actual abuse, or as soon as possible after being made aware.** |

This is a confidential document and should be stored securely according to your own organisation’s procedures. It is your responsibility to ensure that this is done.

|  |
| --- |
| **Decision by Safeguarding Manager:**  |

# Safeguarding Policy Children

Date reviewed 12/12/2023

Due to be reviewed 12/12/2024

**1.1 Principles**

1. New Beginnings is committed to the safeguarding of all children and young people with whom it has contact. The Children Act 1989 makes it clear that the welfare of the child is paramount and that everyone involved in the care of children has a responsibility protecting those children from harm. It is also essential that we honor the trust of those who allow us to care for their children.

**1.2 Duty of Care**

New Beginnings acknowledges the duty of care the organisation has to safeguard and promote the welfare of children. We are committed to ensuring safeguarding practice reflects our statutory responsibilities, government guidance and complies with best practice requirements. Children are any person under the age of eighteen as defined by Article 1 of the United Nations Convention on Rights of the Child. This policy has been written in accordance with the recommendations made by the Stockport Safeguarding Board in terms of multi-agency operational procedures for responding to and investigating abuse. The Safeguarding Essentials checklist has been used as a template for the following policy.

**2. Commitment to following safeguarding procedures:**

This safeguarding policy recognises that the welfare and interest of children are paramount in all circumstances. Having regard for S1. Children Act 1989. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all childrenhave a right to be protected from all forms of harm, abuse, neglect and exploitation; have the right to family life, per Article 8 of the European Convention on Human Rights. Whilst we recognise that it is not our responsibility as members of New Beginnings to decide whether or not child abuse is occurring, it is our responsibility to act on any concerns by reporting these to the relevant local authority.

Our safeguarding policy aims to uphold key principles as defined by Working Together Guidance 2023:

Successful outcomes for children depend on strong partnership working between parents/carers and the practitioners working with them. Practitioners should take a child- centred approach to meeting the needs of the whole family.

* children’s welfare is paramount
* children’s wishes and feelings are sought, heard, and responded to
* children’s social care works in partnership with whole families
* children are raised by their families, with their family networks or in family environments wherever possible
* local authorities work with other agencies to effectively identify and meet the needs of children, young people, and families
* local authorities consider the economic and social circumstances impacting children, young people, and families

**3. Safeguarding duties**

New Beginnings acknowledges that some children, including disabled children and

those from ethnic minority communities may be particularly vulnerable to abuse, neglect or other harm and we acknowledge our duty to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy New Beginnings will:

● Promote and prioritise the safety and wellbeing of children and young people. We will do this by having due regard for the welfare, rights and wellbeing of children and

developing practice, policy and guidance that reflects this commitment.

● Ensure everyone involved with New Beginnings, both contracted staff and volunteers understand their roles and responsibilities in respect of safeguarding. This will be achieved by ensuring that contracted staff and volunteers have an understanding of the issues involved and that appropriate procedures are in place to ensure contracted staff and volunteers recognise, identify and respond to signs of abuse

\*Ensure that all staff and volunteers will have weekly group supervision and monthly 1:1 supervision

\*Ensure that students placed with New Beginnings will attend weekly group supervision and weekly 1:1 supervision with their allocated practice educator

● Ensure appropriate action is taken in the event of incidents or concerns of abuse and ensure that support is provided to the individuals which raises or discloses concern.

● Ensures that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

● Prevent the employment of unsuitable individuals.

● Ensures robust safeguarding arrangements and procedures are in place and are being adhered to.

● As part of our acknowledgement and commitment to children’s rights, we recognise our extended safeguarding duty towards respecting and upholding the fundamental rights of all children we come into contact with.

**4. Policy responsibility and enforcement**

The policy and procedures will be widely promoted and are mandatory for everyone involved with New Beginnings to adhere to. All volunteers, contracted staff and trustees will receive and need to acknowledge receipt of the organisation’s safeguarding policy. The Chief Executive Officer of New Beginnings, Jadwiga Leigh, is responsible for staff and volunteers having adequate safeguarding training for their role, taking into account that New Beginnings will be supporting both vulnerable children and adults. Staff and volunteer records will be kept, and receipt of policy will be recorded.

**5. Identifying child abuse and what to do if abuse is suspected**

All staff and volunteers of the New Beginnings organisation will be asked to complete Multi-Agency Basic Awareness training as a minimum. This course and further training opportunities are available via: www.safeguardingchildreninstockport.org.uk

**Child abuse is generally split into four categories - physical, neglect, sexual and emotional.**

**Physical abuse**

This may involve hitting, kicking, shaking, throwing, squeezing, suffocating, drowning, burning or biting the child. Giving the child alcohol, drugs or poison are also forms of physical abuse. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

**Neglect**

Neglect is the persistent failure to meet a child’s basic physical and psychological needs. This may include the failure to meet a child’s basic needs, like food, shelter, warm clothing or medical attention. Neglect may occur during pregnancy as a result of substance misuse and is also the failure to provide adequate supervision (including leaving children with inappropriate carers).

**Sexual abuse**

Sexual abuse involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. Activities may involve penetrative and non-penetrative acts or non-contact activities such as involving children in looking at, or in the production of pornographic materials, or encouraging children to behave in sexually inappropriate ways. Sexual abuse includes grooming a child in preparation for abuse, for example, via the internet.

**Emotional abuse**

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe adverse effects on a child’s emotional development. This may involve a lack of love and affection, telling a child they are worthless, serious bullying or being constantly shouted at. Emotional abuse also occurs when the child is valued only insofar as they meet the needs of another person, when the child is overprotected and unable to explore and learn on their own or when they witness the ill-treatment or abuse of another (including domestic violence), or animal cruelty.

**6. Possible signs of abuse include:**

* Unexplained or suspicious injuries such as bruising cuts or burns, particularly if situated on a part of the body not normally prone to such injuries or the explanation of the cause of the injury is ill-fitting.
* The child discloses abuse, or describes what appears to be an abusive act.
* Someone else (child or adult) expresses concern about the welfare of another child.
* Unexplained change in behaviour such as withdrawal or sudden outbursts of temper.
* Inappropriate sexual awareness or sexually explicit behaviour.
* Distrust of adults, particularly those with whom a close relationship would normally be expected.
* Difficulty in making friends.
* Eating disorders, depression, self harm or suicide attempts.

**7. What to do if abuse is suspected**

If any staff member or volunteer of New Beginnings suspects abuse is taking place they should immediately inform the designated safeguarding officer, Jadwiga Leigh, who will decide whether or not to take the matter further. A log of the concern must be kept (see Appendix 2 below). For information on how to accept disclosure from a child read Appendix 1.

**New Beginnings** has an appointed individual who is responsible for dealing with any child protection concerns. The named persons for Child Protection within New Beginnings are:

* **Named Designated Safeguarding Officer for Child Protection:**
* Jadwiga Leigh: jadwiga@nbfoundation.co.uk
* Tel: 07584 434 537
* **Deputy Designated Safeguarding Officer** for child protection concerns:
* Matthew Purves email: matthew@nbfoundation.co.uk
* Tel: 07800 618 457

**8.** If it is felt that further investigation is required in order to keep the child safe then the matter must be referred to the relevant Local Authority. Children’s Social Care may be contacted at any time for advice and consultation. In the event of a referral to Children’s Social Care all relevant information must be shared, including copies of correspondence, log of previous concerns and notes of dialogue. The Data Protection Act is not a barrier to information sharing where doing so is necessary to safeguard children.

**9.** In the event that the designated safeguarding officer is not available or contactable this should not delay action being taken to protect a child. Any member of New Beginnings may contact Children’s Social Care directly to raise their concerns.

**10.** Contact with Stockport Children’s Social Care can be made by telephone to:

the Contact Centre on 0161 217 6028, Out of Hours Team on 0161 718 2118, the Police on 0161 872 5050 or in an emergency by dialling 999. If you phone the Contact Centre you should ask to speak to the Duty Social Worker to discuss your concerns.

Referrals made by telephone must be followed up immediately with a written report and a Common Assessment Form. This should be completed for all cases referred by professionals. These forms can be downloaded from the Stockport Council website at

[www.stockport.gov.uk/commonprocesses](http://www.stockport.gov.uk/services/education/cypd/childrenssocialcareandsafeguarding/commonprocesses31).

**In child protection cases, parental consent is not required.**

If you are unsure whether to refer, consultation and advice is available from the Duty Social Worker at the Contact Centre (0161 217 6028) or the Duty Officer at the Safeguarding Children Unit (0161 474 5659).

If there are any concerns about the immediate safety of a child then the police must be contacted without delay.

**11. Allegations against staff**

If there is any suspicion that a child has been abused by a member of contracted staff or a volunteer then this must be reported to the Designated Safeguarding Officer, Jadwiga Leigh, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.

The designated safeguarding officer will refer the allegation to Children’s Social Care who may involve the police or will refer directly to the police if out-of-hours. Children’s Social Care and the designated safeguarding officer will liaise with the Local Authority Designated Officer (LADO) whose responsibility it is to:

* Provide advice and guidance;
* Liaise with the police and other agencies;
* Provide assistance in discussions regarding suspension and referral to the Independent Safeguarding Authority (ISA).

**12.** The parents or carers of the child will be contacted as soon as possible following advice from Children’s Social Care and/or the police.

**13.** If the designated safeguarding officer, Jadwiga Leigh, is the subject of the suspicion/allegation, the concern must be made to Complex Safeguarding Team, Stockport Family 0161 4756847 who will refer the allegation to the Local Authority Designated Officer (LADO) of Children’s Social Care.

**14.** Where there is a complaint against a member of staff there may be three types of investigation:

* A criminal investigation
* A child protection investigation
* A disciplinary or misconduct investigation

**15.** The LADO in Stockport can be contacted at the Safeguarding Children Unit on 0161 474 5657

**16. Internal Enquiries and Suspension**

The designated safeguarding officer will make an immediate decision about whether any individual suspected of abuse should be temporarily suspended pending further police and Children’s Social Care enquiries.

Where an individual is suspended it is advised that other members of contracted staff or volunteers should have no contact until enquiries have concluded. The individual will be assigned a peer mentor whom they can contact and who will contact them to keep them abreast of the situation.

Irrespective of the findings of Children’s Social Care or police enquiries the organisation will assess all individual cases to decide whether a member of staff or volunteer can be reinstated. The welfare of the child should remain of paramount importance throughout.

**17. Additional related policies**

All members of New Beginnings will receive a copy of this policy and undergo training as part of their induction to the organisation:

New Beginnings also has policies on the following related topics which all staff and volunteers must be familiar with:

* Safeguarding Adults
* Safer Recruitment
* Complaints Procedures
* Health and Safety
* Risk Assessments
* Lone worker
* Conflict resolution

# Appendix 1: WHAT TO DO IF A CHILD DISCLOSES ABUSE

Always follow the 4 R’s.

1.  **RECEIVE**

* LISTEN to the child/young person.If you are shocked at what the child/young person says to you try not to show it. Take what the child/young person says to you seriously, children and young people rarely lie about abuse and if they are not believed it adds to the traumatic nature of disclosing. If they meet with revulsion or disbelieve, children and young people may retract what they have said.
* ACCEPT what the child/young person says.Be careful not to burden the child/young person with guilt by asking, “Why didn’t you tell me before?”

**2. REASSURE**

* ***STAY CALM*** Reassure the child/young person that they have done the right thing in talking to you. Be honest with the child/young person. Do not make any promises that you are unable to keep, like “I’ll stay with you”, or “Everything will be all right now”.
* ***DO NOT* promise confidentiality.**
* ***TRY*** to alleviate any feelings of guilt that the child/young person displays, e.g. “You are not alone, you are not the only one this sort of thing has happened to”.
* ***ACKNOWLEDGE*** how hard it must have been for the child/young person to tell you what has happened.
* ***EMPATHISE*** with the child/young person. Don’t tell them what they should be feeling.

**3. REACT**

* ***REACT*** to the child/young person only as far as is necessary for you to establish whether or not you need to refer to matter.
* ***DO NOT*** interrogate the child or make investigations with third parties to establish any of the facts.
* ***AVOID*** asking leading questions, for example “Did he touch your penis?”
* ***BE*** careful about what you ask the child; you may taint any evidence being put before a court.
* ***USE*** open questions, such as, “Is there anything else you would like to tell me?” or “When did it happen?”
* ***DO NOT*** criticise the perpetrator. The child/young person may love him/her and reconciliation may be possible.
* ***DO NOT*** ask the child to repeat what has been said to another member of staff.
* ***EXPLAIN*** what you have to do next and to whom you have to talk to.
* ***INFORM*** the appropriate person according to your procedure/protocol.
* **Our Designated Safeguarding Officer is Jadwiga Leigh, Tel: 07584434537, email:** **jadwiga@nbfoundation.co.uk**

**4. RECORD**

* ***AS SOON*** as is reasonably practicable make notes on what has happened.
* ***DO NOT*** destroy these notes, they should be retained in a safe place. The court in any legal process may require them.
* ***RECORD*** Place, date, time and details of the child/young person involved. Record any noticeable non-verbal behaviour of the child/young person. If the child/young person uses their own words to describe sexual organs/acts, record the words spoken. Do not translate them into proper words.
* ***DRAW*** a diagram (using ‘record of marks observed on a child’) to indicate positioning, size and location of any injuries you have identified
* ***BE OBJECTIVE*** in your recording. Include statements made and what you have seen, rather than assumptions or interpretations. Rely on **FACT.** A fact is any event that can be perceived by one of the five senses.

**SUPPORT**

Identify the support network available to yourself, as certain disclosures can be emotive.

Be aware that after the event, the child/young person may need support. Be prepared for this within your organisation.

Be aware of the sources of advice available for discussion or advice.

**This includes:**

**Stockport Children’s Social Care Contact Centre 0161 217 6028**

**Stockport Safeguarding Children Unit 0161 474 5657**

**NSPCC 0808 800 5000**

# Appendix 2: Safeguarding Children: Note of Concern

|  |  |  |
| --- | --- | --- |
| **Name of child** | **Group** | **Date:** |
| **Issue: Please record the details of the incident/issue you are concerned about. Include verbatim comments where possible. Please keep the account very factual and consider: Who… What… Where… When… How… and Who…****If you are reporting a potential incident of physical abuse remember to include a ‘record of marks observed on a child’.** **Signed:** **(Please continue on the back if necessary)** |

**Data Protection Policy
in accordance with the United Kingdom General Data Protection Regulation (UK GDPR) and Data Protection Act (DPA) 2018**

**Date reviewed** 12/12/2023

**Due to be reviewed** 12/12/2024

**Policy statement**

New Beginnings is committed to a policy of protecting the rights and privacy of service users, community group members, volunteers and contracted staff and others in accordance with the United Kingdom General Data Protection Regulation (UK GDPR) and Data Protection Act (DPA) 2018. The policy applies to all voluntary and community group members and staff involved with the project. Any breach of The Data Protection Act 2018 or this Data Protection Policy is considered to be an offence and, in that event, disciplinary procedures apply. The GDPR was adopted on 14 April 2016, and became enforceable beginning 25 May 2018. As the GDPR is a regulation, not a directive, it is directly binding and applicable, but does provide flexibility for certain aspects of the regulation to be adjusted by individual member states.

Controllers of personal data must put in place appropriate technical and organisational measures to implement the data protection principles. Business processes that handle personal data must be designed and built with consideration of the principles and provide safeguards to protect data (for example, using pseudonymization or full anonymization where appropriate), and use the highest-possible privacy settings by default, so that the data is not available publicly without explicit, informed consent, and cannot be used to identify a subject without additional information stored separately. No personal data may be processed unless it is done under a lawful basis specified by the regulation, or unless the data controller or processor has received an unambiguous and individualized affirmation of consent from the data subject. The data subject has the right to revoke this consent at any time.

As a matter of good practice, other organisations and individuals working with the project, and who have access to personal information, will be expected to have read and to comply with this policy. It is expected that any contracted staff/ volunteers who deal with external organisations will take responsibility for ensuring that such organisations sign a contract agreeing to abide by this policy.

**Legal Requirements**

Data are protected by the Data Protection Act 2018, which came into effect on 1 March 2000 and also by GDPR which came into effect on 25 May 2018. Its purpose is to protect the rights and privacy of individuals and to ensure that personal data are not processed without their knowledge, and, wherever possible, is processed without their consent.

The Act requires us to register the fact that we hold personal data and to acknowledge the right of ‘subject access’ – voluntary and community group members and contracted staff must have the right to copies of their own data.

**Managing Data Protection**

We will ensure that our details are registered with the Information Commissioner.

**Purpose of data held by New Beginnings:**

Data may be held by us for the following purposes:

1. Administration (key notes and assessments)

2. Fundraising

3. Realising the objectives of New Beginnings

4. Accounts & records

5. Advertising, marketing & public relations

6. Information and databank administration

7. Processing for Not for Profit organisations

8. Research/ evaluation reports

9. Volunteers/ contracted staff

**Data Protection Principles**

In terms of the Data Protection Act 2018 and GDPR 2016 we are the ‘data controller’, and as such determine the purpose for which, and the manner in which, any personal data are, or are to be, processed. We must ensure that we have:

**Fairly and lawfully processed personal data**

We will always put our logo on all paperwork, state our intentions on processing the data and state if, and to whom, we intend to give the personal data. Also provide an indication of the duration the data will be kept.

**Processed for limited purpose**

We will not use data for a purpose other than those agreed by data subjects (service users, voluntary, community group members, contracted staff and others). If the data held by us are requested by external organisations for any reason, this will only be passed if data subjects (service users, voluntary, community group members, staff and others) agree. Also, external organisations must state the purpose of processing, agree not to copy the data for further use and sign a contract agreeing to abide by The Data Protection Act 2018, GDPR 2016 and New Beginning’s Data Protection Policy.

**Adequate, relevant and not excessive**

The management committee for New Beginnings will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the individuals about whom the data are held. If data given or obtained are excessive for such purpose, they will be immediately deleted or destroyed.

**Accurate and up-to-date**

We will provide our members (service users, voluntary and community group members, contracted staff and others) with a copy of their data. All amendments will be made immediately and data no longer required will be deleted or destroyed. It is the responsibility of individuals and organisations to ensure the data held by us are accurate and up-to-date. Completion of the appropriate forms (provided by us) will be taken as an indication that the data contained are accurate. Individuals should notify us of any changes, to enable personnel records to be updated accordingly. It is the responsibility of the management committee to act upon notification of changes to data, amending them where relevant.

**Not kept longer than necessary**

We discourage the retention of data for longer than it is required. All personal data will be deleted or destroyed by us after one year of non-membership has elapsed.

**Processed in accordance with the individual’s rights**

All individuals that the management committee hold data on have the right to:

* + Be informed upon the request of all the information held about them within 40 days.
	+ Prevent the processing of their data for the purpose of direct marketing.
	+ Compensation if they can show that they have been caused damage by any contravention of the Act.
	+ The removal and correction of any inaccurate data about them.

**Secure**

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data. New Beginnings computer has a login system and is password protected, which allow only authorised staff can use to access personal data. Passwords on all computers are changed frequently. All documents with personal information is password protected and anonymised. All personal and financial data is kept in a locked filing cabinet and can only be accessed by the management committee. When staff members are using the laptop computer out of the office, care should always be taken to ensure that personal data on screen is not visible to strangers.

**Not transferred to countries outside the European Economic Area, unless the country has adequate protection for the individual.**

Data collated at New Beginnings must not be transferred to countries outside the European Economic Area without the explicit consent of the individual. The Association takes particular care to be aware of this when publishing information on the Internet, which can be accessed from anywhere in the globe. This is because transfer includes placing data on a web site that can be accessed from outside the European Economic Area.

# New Beginnings Privacy Policy

## Our contact details

Name: New Beginnings Foundation CIO

E-mail: info@nbfoundation.co.uk

## The type of personal information we collect from parents who attend New Beginnings:

We currently collect and process the following information:

* Personal identifiers, contacts and characteristics (for example, name and contact details);
* Historical information from professionals and parents;
* Information relating to personal stories told by parents;
* Video footage of children and parents who take part in Video Interaction Guidance.

## How we get the personal information and why we have it:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

* By parents who attend the programme
* From professionals who are involved with the parent that has been referred

We use the information that you have given us in order to:

* Understand the experiences parents and their children have had so that we can create a bespoke plan that is tailored to meet their needs
* To help parents understand how their past has affected their identity and the way they parent
* To help parents build and improve the relationship they have with their children
* To help parents address the concerns that professionals have about their ability to parent.

We may share this information with the allocated social worker for the family and the local authority which referred the parent into the programme.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

**(a) Your consent to take part in the programme. You are able to remove your consent at any time. You can do this by contacting: Your allocated social worker; your key worker or the Project Lead.**

**(b) We have a vital interest in your development.**

**(c) We need it to perform a public task.**

**(d) We have a legitimate interest.**

## How we store your personal information

Your information is securely stored.

We keep all personal information collected from parents who join the programme for two years. We store all the information we collect on the New Beginnings Microsoft SharePoint Drive. We will then dispose your information by deleting it permanently.

We keep anonymised data about the progress parents made whilst with New Beginnings on an impact data sheet to monitor our effectiveness. This data will be kept for the duration of the project.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@nbfoundation.co.uk if you wish to make a request.

**How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at info@nbfoundation.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

# Complaints policy and procedure

**Reviewed** 18/12/2023

**Next review** 18/12/2024

**Policy introduction and scope**

New Beginnings is a pilot project which has been designed to work with parents whose children are known to Children’s Social Care for concerns relating to neglect; emotional, physical or sexual abuse. We want to work closely with families so that they can develop the skills they need to turn their lives around and then share their expertise with other families in similar situations by becoming their peer mentors.

The scope of our service includes specialist support, advice, mentoring and anti-oppressive direct work.

We aim to provide the highest quality of service intervention with and for service users and if this goes wrong, we want to know about it. This will enable us to handle specific complaints and provides us with the opportunity to develop and strengthen our overall practice and work.

This policy and procedure sets out our commitment for dealing with complaints and how we will deal with them if they arise. This document deals with complaints made by service users, members of the public, volunteers, contracted staff or stakeholders or referrers.

If someone wishes to make a complaint the following procedure is to be adopted:

The complaint should be made in writing where possible in electronic or handwritten

form to the Chief Executive Officer of the project: Jadwiga Leigh and emailed to: info@nbfoundation.co.uk

In the event the complaint is about Jadwiga Leigh then the letter should be addressed to the Chair of Trustees, Ann Potter (ann@nbfoundation.co.uk). Within 5 working days of receipt of the complaint, the complainant will be contacted by the Chair of Trustees. The complaint will be recorded and full notes made of the complaint.

**Complaints involving professional conduct of registered professionals**

In the event of serious complaints being made about registered practitioners such as social workers or those who subscribe to membership of professional bodies full consideration will be made as part of the complaints process whether conduct needs to be referred to the relevant professional or registrant body as part of the complaints process. Where this is considered likely or relevant the complaint will automatically be referred to the management committee.

**Complaints involving professional conduct with respect to children**

In the event of safeguarding concerns arising out of any complaint, the complaint will

immediately be referred to the Local Authority Designated Office in Stockport, the organisation’s main stockholder as per the Safeguarding Policy for Children.

Records will be held for the period of investigation defined by statutory guidance.

**Recording of complaints**

Full records will be kept regarding all complaints and conversations about complaints, action taken and resolution.

**Review process**

This process will be reviewed every year to ensure it is effective and accessible to all who wish to make a complaint about the project. We are committed to remaining open and transparent with regards to what we do and want to create a positive culture around complaints where best practice is allowed to develop so that we may continually improve standards.

# Conflict Policy for Staff, Volunteers, Students and Peer Mentors

**Date reviewed: 18.12.2023**

**Date of review: 18.12.2024**

Statement:

This policy will enable New Beginnings to demonstrate its commitment to working ‘with’ others to resolve conflict. It aims to provide guidance in respect of the management of conflict and outline the support available. We appreciate the difficulty in managing such situations however we hope to use these occasions to listen and learn from each other, in order that we may build and repair relationships.

This policy therefore aims to:

* Promote good practice and support staff, volunteers and peer mentors to manage conflict in a constructive, open and reflective manner.
* To come together at times of difficulty, to listen, learn and find a way forward together, where possible.
* To facilitate conversations and support others when conflict has been identified. We hope that by doing so we foster confidence in others when managing future conflict.
* To provide clear guidance in respect of the expectations of the team and highlight the support available.

Definition of conflict

Conflict means a dispute or argument about something important. Conflict may occur on New Beginnings in the following circumstances: between two or more parents connected to the programme; or between one or more professionals and a parent; or between professionals about a parent.

Ethos

New Beginnings involves sharing personal and highly sensitive information with staff, volunteers, peer mentors and other parents. It is therefore important that within the team and amongst partners (other organisations) and participants (families) trusting and transparent relationships are fostered. New Beginnings ethos is to facilitate conversations and provide bespoke support to those involved. It is recognised that these kinds of conversations are not easy, and that team members do not always get it right. Being open and making conflict visible may also feel awkward for some, however it is a practice we believe is important as it provides an opportunity for all parties to contribute to the discussion, feel heard and, more importantly, be a part of the solution.

At New Beginnings, we strive to be open, honest and transparent. We aim to work ‘with’ parents, professionals and each other in order to keep families together. However, we appreciate that human relationships are complex and that in trying to work in partnership with a range of people, we need to be flexible and able to adapt to different circumstances. We recognise that conflict does occur and that when it does, it is often followed by anxiety. Rather than see conflict as a problem, we try to use it as an opportunity to learn and to utilise the skills we practise throughout the project. We believe therefore that most disagreements can be resolved through discussion and negotiation. In order to avoid increased levels of anxiety, or causing harm to those involved, we attempt to resolve matters of conflict within 48 hours.

The following points outline the stages of conflict resolution we hope all involved with New Beginnings will adhere to:

1. Any concerns about potential conflict should be shared with either of the Project Lead, Jadwiga Leigh, or the Project Coordinator, Matthew Purves, as soon as it emerges. It is important that all staff, volunteers and peer mentors disclose activities that may have caused the conflict so that facilitators understand the context of the situation. We ask this to take place, not to invade privacy but to ensure that we can support all of those who have been impacted.
2. Once the conflict has been identified and shared with one of the facilitators, it is important that a discussion takes place with the core team (both facilitators and the people involved) to assess the information provided, the likelihood of conflict continuing and the next steps required to prevent the situation worsening.
3. As New Beginnings works in partnership with Stockport Local Authority where the restorative practice model is in place, we too will use the restorative model in our practice when trying to resolve conflict. We will endeavour therefore to bring together those involved, in a neutral setting, so that we can discuss: the nature of the conflict; understand and respect individual perspectives of how that conflict emerged; attempt to seek solutions in partnership with the concerned parties; work together to reach an outcome that is suitable for all and will work to reduce further issues from occurring.
4. We hope that this process helps to resolve or diminish the conflict and prevent it from occurring again. However, if it continues or worsens, we will meet again and hold further conversations about what did not work and what is needed for the conflict to be resolved. We will operate in this way until the conflict ends and all parties involved feel satisfied with the outcome.

# Lone Worker Policy

**Date reviewed**: 18.12.2023

**Due to be reviewed:** 18.12.2024

New Beginnings takes seriously its responsibilities to ensure the health, safety and welfare of all staff and volunteers who work alone either from home or out in the community without close or direct support or supervision.

We are committed to reducing the risks to staff and volunteers and the purpose of this policy is to ensure that there are adequate systems in place to reduce the risks of lone working as far as is reasonably possible and practicable.

This policy applies to all staff and volunteers who are undertaking activities on behalf of New Beginnings. The purpose is to help you think about and improve your personal safety, be aware of risks and to take steps to reduce and adapt strategies to keep you safe.

**Definition**

A lone worker is anyone who works away from other volunteers or paid workers without direct support or supervision. This may include volunteers undertaking roles such as:

* befriender
* fundraiser
* community worker
* events assistant

**Responsibilities**

Staff, volunteers and New Beginnings share responsibility for health and safety matters.

New Beginnings is responsible for:

•  assessing the potential risks volunteers may face in their role and reduce these as much as is practically possible

•  implementing procedures that help ensure health, safety and well being of staff and volunteers

It is the responsibility of the Board of Trustees to:
• regularly monitor and review policy and procedures

It is the responsibility of the Chief Executive Officer to:
• ensure appropriate policies and procedures are in place and implemented to

ensure the health and safety of volunteers

The project manager is responsible for:

•  making risk assessments

•  maintaining contact with staff, volunteers working alone either internally or externally

•  ensuring systems are in place to identify volunteers who do not report back or return at the expected time

•  raising an appropriate level of alarm if staff or volunteer cannot be contacted or does not return within 2 hours of expected contact or return

•  contacting the police if staff or volunteer cannot be located

•  ensuring all staff or volunteers are aware of this policy and providing appropriate levels of training and guidance on lone working staff or volunteers are expected to:

•  take reasonable care of their own safety and that of others

•  comply with any personal safety procedures detailed by New Beginnings

•  raise any concerns with their supervisor immediately

•  report any accidents, incidents, injuries or ‘near misses’

•  report any safety practices that need to be improved or risks not otherwise identified

Reasonable precautions might include:

•  checking directions for destination

•  ensuring a vehicle is roadworthy and has breakdown cover

•  ensuring someone knows where they are going and when they are expected home

•  avoiding poorly lit or deserted areas

•  taking care when leaving or entering empty buildings especially at night

•  ensuring that equipment such as laptops or mobile phones are carried discreetly

**Risk Assessment**

Risk assessments will be carried out for activities where there are concerns that a member of staff or volunteer will be placed at risk. If this is required, written records of assessments will be maintained and regularly reviewed.

Factors that will be considered as appropriate to the circumstances are:

•  The environment – location, security, access

•  The context – nature of the task, any special circumstances

•  The individuals concerns – indicators of potential or actual risk

•  History – any previous incidents in similar situations

•  Any special circumstances

Where there is any reasonable doubt about the safety of a lone worker, consideration will be given to sending 2 members of staff or 2 volunteers or making other arrangements to undertake the task.

# Guidance on Lone Working

This guidance applies to staff and volunteers whose roles require them to work alone without direct support or supervision.

**Working from home**

**If working from home staff or volunteers should:**

•  Take reasonable precautions to ensure that their personal addresses and telephone numbers remain confidential.
All numbers including ex-directory and mobile numbers can show up on caller display and retrieved on 1471. To avoid access to landline numbers dial 141 before dialling the number. To avoid mobile numbers being available please check the mobile phone’s instruction manual

•  Remain in regular contact with your supervisor

**Before working alone away from the office or home you should:**

•  Leave details with your supervisor of where you plan to go, approximate times of when you expect to be there, details of any meetings you have arranged, including the name of the person you are meeting

•  Ensure you have an appropriate means of communication

•  If taking a mobile phone, check it is fully charged and (for pay-as-you-go), has sufficient credit; leave it switched on; do not use it whilst driving

•  Take and use any other personal protective equipment provided or identified in service specific risk assessments

•  Think about where you will be going and what you will be doing; consider whether there are particular risks relating to that location or activity (e.g. an unusually isolated location, adverse weather conditions for driving). If there are, discuss them with your supervisor or chief executive before setting off

•  Contact the office, or other person, to tell them about any delays or changes to your schedule

•  Make contact by telephone at specified times, if you agreed to do this

•  Return to or contact your supervisor, or other person as agreed, when you have safely completed your activities

**Meeting with clients away from the office**

•  Leave details with your supervisor of where you plan to go, approximate times of when you expect to be there, details of any meetings you have arranged, including the name of the person you are meeting

•  Ensure you have an appropriate means of communication

•  If taking a mobile phone, check it is fully charged and (for pay-as-you-go), has sufficient credit; leave it switched on; do not use it whilst driving

•  Think about where you will be going and what you will be doing; consider whether there are particular risks relating to that location or activity (e.g. an unusually isolated location, adverse weather conditions for driving). If there are, discuss them with your supervisor or chief executive before setting off

•  Contact the Project Lead Jadwiga Leigh or Project Coordinator Matthew Purves to tell them about any delays or changes to your schedule

•  Make contact by telephone at specified times, if you agreed to do this

•  Return to or contact your supervisor, or other person as agreed, when you have safely completed your activities

•  Tell your supervisor about any incidents which arose during the meeting.

**Travelling by car**

This might include travelling long distances to unfamiliar areas, perhaps at night.

•  Plan your route and take appropriate maps

•  Ensure that the vehicle is in good order and that you have sufficient fuel; take warm clothes in case of breakdown or bad weather

•  Keep valuables out of sight; female staff should not leave obvious signs that the driver is female (handbags, coats etc) on the seats

•  Park in well-lit areas, if possible with the car facing in the direction of exit; when returning to the vehicle, check the back seat

•  Carry a mobile phone for emergency use

•  Do not pick up hitchhikers

•  Carry a torch at night

•  If you see an incident, do not stop unless it is safe to do so; it may be safer to drive on and summon help

•  If you are forced to stop, keep your engine running and lock the windows and doors; leave sufficient space in front of the vehicle to be able to pull out and drive away; drive off if you feel threatened

**Road rage**

Unfortunately, this type of incident is becoming more common. If at any time you are confronted by this situation, it is important that you do nothing to escalate it further.

•  Do not stop to confront the third party.

•  If a car pulls in front of you and you are approached, stay in your vehicle with the doors locked and windows closed; keep the engine running and drive away as soon as possible.

•  If you cannot get away make as much noise and fuss as you can; sound the horn, flash lights etc. To gain others’ attention.

•  If you think you are being followed or feel threatened, raise the alarm by using hazard lights and horn; if possible, drive on until you reach a busy area such as a 24 hour garage

•  If you are stationary and have a mobile phone, ring the emergency services

.

**If you breakdown on a motorway or dual carriageway**

•  Park as near as possible to an emergency phone

•  If you have to walk, wear high visibility clothing if possible

•  Leave your car by the passenger door

•  When making an emergency call, face oncoming traffic, so you can see if another vehicle is approaching

•  Tell the operator if you are a lone female

•  Never cross the carriageway

•  Wait behind the barrier, beside your vehicle if this is safe

•  Ask for id from uniformed persons to ensure they are bona fide

**Travelling by public transport**

•  Plan your route (outward and return) in advance

•  Try to avoid travelling alone late at night

•  Wait in busy, well-lit areas if possible; be aware of the location of exits

•  Have your fare/ticket ready and separate from other valuables

•  Try to keep one hand free

•  Sit downstairs on double-decker buses

•  Try to avoid falling asleep

**Travelling on foot**

•  Think ahead, be alert and aware of your surroundings

•  Keep one hand free if possible

•  Avoid short-cuts, underpasses or poorly lit areas

•  Walk facing on-coming traffic

•  Do not hitchhike or accept lifts from strangers

•  Keep valuables out of site and avoid areas where groups may gather e.g. Clubs, pubs etc.

•  Avoid wearing personal stereos

•  If you carry a personal alarm, ensure that it works and that you can quickly

access it.

**Dog attack**

•  Do not enter premises where an unfamiliar dog is loose

•  If, when talking to a client, their dog causes you to feel uncomfortable, politely ask them to remove it

**Aggression or violence**

This includes aggressive or inappropriate physical contact which may or may not result in pain and/or injury or offence and other non-physical abuse including verbal, racial or sexual abuse, threatening behaviour, gesturing, swearing, shouting, insults, innuendo, intimidating behaviour causing fear or emotional upset.

•  Consider the safety of others and protect yourself before protecting the property of New Beginnings

•  Contact the Chief Executive Officer Jadwiga Leigh immediately after the incident

# Social Media Policy

**Date reviewed 18.12.2023**

**Due to be reviewed 18.12.2024**

**Introduction**

**What is social media?**

Social media is the term given to web-based tools and applications which enable users to create and share content (words, images and video content), and network with each other through the sharing of information, opinions, knowledge and common interests. Examples of social media include Facebook, Twitter, LinkedIn and Instagram.

**Why do we use social media?**

Social media is essential to the success of communicating New Beginnings’ work. It is important for some staff to participate in social media to engage with our audience, participate in relevant conversations and raise the profile of New Beginnings’ work.

**Why do we need a social media policy?**

The difference between a personal and professional opinion can be blurred on social media, particularly if you're discussing issues relating to New Beginnings’ work. While we encourage the use of social media, we have certain standards, outlined in this policy, which we require everyone to observe. Publication and commentary on social media carries similar obligations to any other kind of publication or commentary in the public domain.

This policy is intended for all [staff members of all levels, students, volunteers and directors], and applies to content posted on both a New Beginnings device and a personal device. Before engaging in work-related social media activity, staff must read this policy.

**Setting out the social media policy**

This policy sets out guidelines on how social media should be used to support the delivery and promotion of New Beginnings, and the use of social media by staff in both a professional and personal capacity. It sets out what you need to be aware of when interacting in these spaces and is designed to help staff support and expand our official social media channels, while protecting the project and its reputation and preventing any legal issues.

**Internet access and monitoring usage**

When using the internet at work, staff are permitted to make reasonable and appropriate use of personal social media activity during your lunch breaks. But usage should not be excessive and interfere with your duties.

**Point of contact for social media**

Jadwiga Leigh is responsible for the day-to-day publishing, monitoring and management of our social media channels. If you have specific questions about any aspect of these channels, speak to the Programme Lead, Jadwiga Leigh. No other staff member can post content on New Beginnings’ official channels without the permission of Jadwiga Leigh.

**Which social media channels do we use?**

New Beginnings uses the following social media channels:

X formerly known as Twitter- This channel is used to explain to followers what kind of work we are doing and the impact our work is having on families.

Instagram- This channel is used to explain to followers what kind of work we are doing and the impact our work is having on families.

Facebook- This channel is used to explain to followers what kind of work we are doing and the impact our work is having on families.

**Guidelines**

**New Beginnings’ social media channels — appropriate conduct**

1. Jadwiga Leigh is responsible for managing New Beginnings’ social media channels.

2. Staff should ensure they reflect New Beginnings’ values in what they post and use our tone of voice. We actively refrain from entering disputes with others or bringing other organisations into disrepute.

3. We want to make sure that all social media content has a purpose and a benefit for our families and our partners, and we want it to accurately reflect New Beginnings’ agreed position.

4. We want to bring value to our audience(s). Answer their questions, help and engage with them

5. We want to take care with the presentation of content. We try to make sure that there are no typos, misspellings or grammatical errors. We also check the quality of images.

6. We always pause and think before posting. That said, we do try to reply to comments in a timely manner, when a response is appropriate.

7. If staff wish to contribute content for social media, whether non-paid for or paid for advertising, they should speak to Jadwiga Leigh about this.

8. Staff should not post content about supporters or service users without their express permission. If staff are sharing information about supporters, service users or third party organisations, this content should be clearly labelled so our audiences know it has not come directly from New Beginnings. If using interviews, videos or photos that clearly identify a client, staff must ensure they have the person’s consent or if a child, the parent or guardian’s consent, before using them on social media.

9. We endeavour to always check facts. Staff should not automatically assume that material is accurate and should take reasonable steps where necessary to seek verification, for example, by checking data/statistics and being wary of photo manipulation.

10. We aim to be honest. We say what we know to be true or have a good source for. If we have made a mistake, we will not be afraid to admit it.

11. Staff should refrain from offering personal opinions via New Beginnings’ social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in doubt about New Beginnings’ position on a particular issue, please speak to Jadwiga Leigh.

12. It is vital that New Beginnings does not encourage others to risk their personal safety or that of others, to gather materials. For example, a video of a stunt.

13. Staff should not encourage people to break the law to supply material for social media, such as using unauthorised video footage. All relevant rights for usage must be obtained before publishing material.

14. Staff should not set up other Facebook groups or pages, Twitter accounts or any other social media channels on behalf of New Beginnings. This could confuse messaging and brand awareness. By having official social media accounts in place, the New Beginnings’ team can ensure consistency of the brand and focus on building a strong following.

15. New Beginnings is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. We have every right to express views on policy, including the policies of parties, but we can't tell people how to vote.

16. If a complaint is made on New Beginnings’ social media channels, staff should seek advice from the Jadwiga Leigh before responding.

17. Sometimes issues can arise on social media which can escalate into a crisis situation because they are sensitive or risk serious damage to the project's reputation. Examples might include: A parent having a child removed and feeling that New Beginnings did not do enough to help them. The nature of social media means that complaints are visible and can escalate quickly. Not acting can be detrimental to the project.

The New Beginnings’ team account regularly monitors our social media spaces for mentions of New Beginnings’ so we can catch any issues or problems early. If there is an issue that could develop or has already developed into a crisis situation, the New Beginnings’ team will contact Jadwiga Leigh so that a crisis management plan can be discussed and implemented as appropriate.

If any staff outside of the New Beginnings become aware of any comments online that they think have the potential to escalate into a crisis, whether on New Beginnings’ social media channels or elsewhere, they should speak to Jadwiga Leigh immediately.

# Use of personal social media accounts — appropriate conduct

This policy does not intend to inhibit personal use of social media but instead flags up those areas in which conflicts might arise. New Beginnings’ staff are expected to behave appropriately, and in ways that are consistent with New Beginnings’ values and policies, both online and in real life.

1. Be aware that any information you make public could affect how people perceive New Beginnings. You must make it clear when you are speaking for yourself and not on behalf of New Beginnings. If you are using your personal social media accounts to promote and talk about New Beginnings’ work, you must use a disclaimer such as: "The views expressed on this site are my own and don't necessarily represent New Beginnings’ positions, policies or opinions."

2. Staff who have a personal blog or website which indicates in any way that they work at New Beginnings should discuss any potential conflicts of interest with their line manager and the New Beginnings. Similarly, staff who want to start blogging and wish to say that they work for New Beginnings should discuss any potential conflicts of interest with their line manager and the New Beginnings’ team.

3. Those in senior management, for example the Board of Trustees or the Project Lead or NB Parents Advisory Group, and specialist roles where they are well known in their field of expertise, must take particular care as personal views published may be misunderstood as expressing New Beginnings’ view.

4. Use common sense and good judgement. Be aware of your association with New Beginnings and ensure your profile and related content is consistent with how you wish to present yourself to the general public, colleagues, partners and funders.

5. If a staff member is contacted by the press about their social media posts that relate to New Beginnings they should talk to the Jadwiga Leigh immediately and under no circumstances respond directly.

6. New Beginnings is not a political organisation and does not hold a view on party politics or have any affiliation with or links to political parties. When representing New Beginnings’ staff are expected to hold New Beginnings’ position of neutrality. Staff who are politically active in their spare time need to be clear in separating their personal political identity from New Beginnings and understand and avoid potential conflicts of interest.

7. Never use New Beginnings’ logos or trademarks unless approved to do so. Permission to use logos should be requested from the New Beginnings’ team.

8. Always protect yourself and New Beginnings. Be careful with your privacy online and be cautious when sharing personal information. What you publish is widely accessible and will be around for a long time, so do consider the content carefully. When you are using social media sites at work, it is important that you do so safely.

9. Think about your reputation as well as New Beginnings’. Express your opinions and deal with differences of opinion respectfully. Don't insult people or treat them badly. Passionate discussions and debates are fine, but you should always be respectful of others and their opinions. Be polite and the first to correct your own mistakes.

10. We encourage staff to share tweets and posts that we have issued. When online in a personal capacity, you might also see opportunities to comment on or support New Beginnings and the work we do. Where appropriate and using the guidelines within this policy, we encourage staff to do this as it provides a human voice and raises our profile. However, if the content is controversial or misrepresented, please highlight this to the Jadwiga Leigh who will respond as appropriate.

**Further guidelines**

**Libel**

Libel is when a false written statement that is damaging to a person's reputation is published online or in print. Whether staff are posting content on social media as part of their job or in a personal capacity, they should not bring New Beginnings into disrepute by making defamatory comments about individuals or other organisations or groups.

**Copyright law**

It is critical that all staff abide by the laws governing copyright, under the Copyright, Designs and Patents Act 1988. Never use or adapt someone else's images or written content without permission. Failing to acknowledge the source/author/resource citation, where permission has been given to reproduce content, is also considered a breach of copyright.

**Confidentiality**

Any communications that staff make in a personal capacity must not breach confidentiality. For example, information meant for internal use only or information that New Beginnings is not ready to disclose yet. For example, a news story that is embargoed for a particular date.

**Discrimination and harassment**

Staff should not post content that could be considered discriminatory against, or bullying or harassment of, any individual, on either an official New Beginnings’ social media channel or a personal account. For example:

• making offensive or derogatory comments relating to sex, gender, race, disability, sexual orientation, age, religion or belief

• using social media to bully another individual

• posting images that are discriminatory or offensive or links to such content

**Lobbying Act**

Charities are legally allowed to campaign to bring about a change in policy or law to further their organisational purpose. In most cases, spending on charity campaigns that are in accordance with charity law will not be regulated under electoral law. However, the Lobbying Act, which was passed in January 2014, states that during national elections (known as regulated periods) spending on campaigning activities may be regulated.

Charities which spend more than £20,000 in England or £10,000 in Scotland, Wales or Northern Ireland, during the regulated period, need to register with the Electoral Commission. To abide by the Lobbying Act, campaigning activities on social media must not be seen as intending to influence people's voting choice. During these periods, all campaigning activity will be reviewed by the Jadwiga Leigh.

**Use of social media in the recruitment process**

Recruitment should be carried out in accordance with associated procedures and guidelines. Any advertising of vacancies should be done through the agreed channels.

There should be no systematic or routine checking of candidate's online social media activities during the recruitment process, as conducting these searches might lead to a presumption that an applicant's protected characteristics, such as religious beliefs or sexual orientation, played a part in a recruitment decision. This is in line with New Beginnings’ Equal Opportunities Policy.

**Protection and intervention**

The responsibility for measures of protection and intervention lies first with the social networking site itself. Different social networking sites offer different models of interventions in different areas. For more information, refer to the guidance available on the social networking site itself. For example, Twitter. However, if a staff member considers that a person/people is/are at risk of harm, they should report this to the Jadwiga Leigh immediately.

**Under 18s and vulnerable people we work with on New Beginnings**

Young and vulnerable people face risks when using social networking sites. They may be at risk of being bullied, publishing sensitive and personal information on their profiles, or from becoming targets for online grooming.

Where known, when communicating with young people under 18-years-old or their parents whom we work with via social media, staff should ensure the online relationship with New Beginnings follows the same rules as the offline 'real-life' relationship. Staff should ensure that young people have been made aware of the risks of communicating and sharing information online and given guidance on security/privacy settings as necessary. Staff should also ensure that the site itself is suitable for the young person and New Beginnings content and other content is appropriate for them. Please refer to our [Safeguarding Policy].

**Responsibilities and beach of policy**

Everyone is responsible for their own compliance with this policy. Participation in social media on behalf of New Beginnings’ is not a right but an opportunity, so it must be treated seriously and with respect. For staff, breaches of policy may incur disciplinary action, depending on the severity of the issue. Staff who are unsure about whether something they propose to do on social media might breach this policy, should seek advice from Jadwiga Leigh.

**Public Interest Disclosure**

Under the Public Interest Disclosure Act 1998, if a staff member releases information through New Beginnings’ social media channels that is considered to be in the interest of the public, New Beginnings’ Whistleblowing Policy must be initiated before any further action is taken.

# Whistleblowing Policy

**Reviewed 18.12.2023**

**Due for review 18.12.24**

**Introduction**

It is important that any fraud, misconduct or wrongdoing by staff or others working on behalf of New Beginnings is reported and properly dealt with. We therefore require all individuals to raise any concerns that they may have about the conduct of others in New Beginnings or the way in which the organisation is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

**Background**

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters in the public interest. These are called ‘qualifying disclosures’. A qualifying disclosure is one made by an employee who has a reasonable belief that any of the following is being, has been or is likely to be, committed:

A criminal offence

A miscarriage of justice

An act creating risk to health and safety

An act causing damage to the environment

A breach of any other legal obligation

Concealment of any of the above

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. You have no responsibility for investigating the matter – it is New Beginnings Foundation responsibility to ensure that an investigation takes place.

If you make a protected disclosure you have the right not to be dismissed, subjected to any other detriment or victimised because you have made a disclosure. We encourage you to raise your concerns under this procedure in the first instance.

**Principles**

1. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of New Beginnings should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
2. Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
3. No employee or other person working on behalf of New Beginnings will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.
4. Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.
5. If misconduct is discovered as a result of any investigation under this procedure, our disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is a disciplinary offence.
6. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to the Chief Executive Officer, Jadwiga Leigh or the Board of Trustees.

**Procedure for whistleblowing disclosures**

This procedure is for disclosures about matters other than a breach of your own contract of employment, which should be raised via the complaints procedure.

**Stage 1**

In the first instance, any concerns should be raised with the Chief Executive Officer, Jadwiga Leigh, who will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account and you will be asked to comment on any additional evidence obtained. The Chief Executive Officer will take any necessary action, including reporting the matter to the Board of Trustees and any appropriate local government department or regulatory agency such as, for example, Social Work England. The Chief Executive Officer will also invoke any disciplinary action if required. On conclusion of any investigation, you will be told the outcome and what the New Beginnings Foundation has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

**Stage 2**

If you are concerned that the Chief Executive Officer, Jadwiga Leigh, is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the relevant person, you should escalate the matter to the Board of Trustees. The Chair of the Board, Ann Potter (ann@nbfoundation.co.uk) will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the board.

**Stage 3**

If on conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. This includes:

HM Revenue & Customs

The Health and Safety Executive

The Environment Agency

The Serious Fraud Office

The Charity Commission

The Pensions Regulator

The Information Commissioner

The Financial Conduct Authority.

You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014:

[www.gov.uk/government/uploads/system/uploads/attachment\_data/file/496899/BIS-16- 79-blowing-the-whistle-to-a-prescribed-person.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-%2079-blowing-the-whistle-to-a-prescribed-person.pdf)

# Privacy Considerations When Using Virtual Platforms on New Beginnings

Reviewed: 18.12.23

Due to be reviewed: 18.12.2024

Guidance on Protecting Privacy and Data when using virtual platforms such as Zoom or Microsoft Teams to conduct remote meetings while COVID-19 modifications are in effect. This guidance applies to group sessions, supervisions, team meetings and 1:1 key work sessions.

**A. Purpose and Principles**

Zoom or Microsoft Teams is one of the primary approved software tools for conducting remote/virtual meetings. This document provides basic guidance on how to protect your privacy and the privacy of others when using these virtual platforms.

Privacy is a basis for an ethical and respectful workplace; and privacy, together with information security, underpins the New Beginnings’ ability to be a good steward of the information entrusted to it by its staff, students, volunteers and families. Use of remote delivery software and technologies heightens the criticality of privacy and the need to use the least invasive means of engaging in these alternative methods of conducting our activities. Existing law and policy that address privacy remain in effect when we work remotely.

All New Beginnings’ staff, students, volunteers and families should follow these principles when using Zoom or Microsoft Teams to conduct remote meetings:

**B. Technical Tips and Privacy Protections for Video Conferencing**

**Visibility of Remote Locations:**

Participants should use Zoom or Microsoft Teams’ virtual background feature, when available, if they do not want to have their surroundings visible.

Select only appropriate virtual backgrounds.

Be mindful of others in your remote location who may not wish to be visible or recorded in the background.

Also consider if all participants need to be visible as limiting the meeting to a single video stream can ease bandwidth concerns for participants.

Ensure sensitive conversations cannot be overheard or work observed by unauthorized persons.

**Screen Sharing Privacy: Protecting Confidential Data on Your Device from Being Viewed**

Avoid sharing confidential information visible on your other screens.

Before screen sharing, close all applications, emails and documents that you will not use in that session.

**Managing Whose Screen is Visible (link is external):**

Zoom or Microsoft Teams default settings limit screen sharing to the host. The host can also allow screen sharing by participants. Zoom or Microsoft Teams share options are available by clicking on the up arrow by the Share Screen icon. The host should remind participants not to share other sensitive information during the meeting inadvertently.

**Managing Participants: Some basic tips for limited preventing unwanted attendees on Microsoft Teams or Zoom Bombing are listed below:**

Create a group on Microsoft Teams for each Cohort so only members of that cohort can see each others email addresses, group chat and posted documents

Do not add members from another group to a group if there has been a confusion in which link to access for which group

If you find that members from another group have been accidentally added, ask everyone to exit the group immediately and set up a new link. Ask those who posted in the group to delete their chat messages. Inform the Project Lead, Jadwiga Leigh, of the error.

If you find that members from another group have accidentally viewed another groups posts, inform Project Lead Jadwiga Leigh immediately so that an appropriate response can be invoked immediately.

**To avoid Zoom bombing:**

Don’t post meeting IDs in public forums.

Don’t reuse meeting access codes. You can generate a new access code for each meeting.

Monitor participant list for unwanted attendees

**Using Zoom settings for meeting participants, the meeting host can:**

Limit attendance to participants who are signed into the meeting using the email listed in the meeting invited

Set up a Waiting Room Function

Password protect meeting access

Lock meetings once they start

Mute participants who are not presenting

Remove unwanted participants

Disable private chat

For further privacy features and options for Zoom see: https://blog.zoom.us/wordpress/2020/03/20/keep-the-party-crashers-from-crashing-your-zoom-event/(link is external)

**C. Recording of Zoom or Microsoft Teams Meetings and Chats**

**Recording of Meetings – Notice/Consent:**

Group work sessions should **not** be recorded.

However, if you need to record a key work session, shared review, supervision or training session it is important to obtain participants’ permission first before capturing the content.

Meeting hosts should always inform and seek consent from participants at the start of the meeting or in advance of the meeting if they are going to record a meeting. Zoom automatically notifies attendees present at the start of a meeting if the meeting is being recorded. However, Microsoft Teams does not. Meeting hosts should share the content of the recording with those who have been recorded. If a participant does not consent then the Meeting Host will need to seek an alternative method for capturing the session content.

It is recommended that the Meeting Host inform meeting attendees, prior to a recorded meeting, how they intend to record, use, and share video. They may also consider giving attendees options to participate without having their image or voice recorded, such as allowing them to attend with no video or audio, and the option to pose questions only in the text chat window. Because you can start and stop recordings in Zoom or Microsoft Teams at any time, you can choose to include unrecorded time throughout your Zoom session, giving attendees an opportunity to discuss topics or ask questions that they do not wish to have recorded.


# POLICY FOR USING VIDEO INTERACTIVE GUIDANCE WITH PARENTS ON NEW BEGINNINGS

Reviewed: 18.12.23

Due to be reviewed: 18.12.24

**PURPOSE AND CONTENT**

This policy provides information on Video Interaction Guidance (VIG). It includes guidelines on consent to being filmed, and the ownership of any recorded material. It also gives guidance in relation to the storage and retrieval of the video recordings, and the safe storage and usage of the video recordings and equipment.

**1. WHAT IS VIDEO INTERACTION GUIDANCE?**

**1.1** Video Interaction Guidance is a method, which aims to improve communication and relationships for participants. Participants are supported by a VIG Practitioner to view and discuss short edited clips of personal interaction. Participants become much more aware of their own skills in effective communication through viewing themselves and reflecting on what they observe. The Practitioner aims to empower participants in the process of change by exploring perceptions, building on their strengths and challenging assumptions. Relationships, interactions and behaviour can improve as participants change their communication style.

**1.2** This method is based on three theoretical standpoints:

* Theories of intersubjectivity and mediated learning
* Theories of change which emphasise respect, empowerment and collaboration
* Theories of change which use self-modelling and video feedback.

**1.3** Professor Colwyn Trevarthen at Edinburgh University has provided the main theoretical core through his work on intersubjectivity. The method of VIG was developed by Harrie Biemans (Stichting Promotie Intensive Thusbehandling Netherlands) in the nineteen-eighties, and further developed in Dundee by Hilary Kennedy, Penny Forsyth and Raymond Simpson (Dundee Educational Psychology Service).

**1.4** VIG is being used in a range of ways in Children’s Services, Community Care and Criminal Justice. VIG is an accredited training programme with regular supervision and support provided for all VIG trainees by accredited or trainee VIG Supervisors.

\*Please note that the term a VIG Practitioner in this document also relates to trainees undertaking VIG Practitioner training.

**2. VIDEO INTERACTION GUIDANCE AS A CLINICAL TOOL**

2.1 DEFINITION

The video recording of parent and child in interaction is a temporary tool which is used to help as part of a therapeutic intervention.

A therapeutic tool is here defined as a means through which one intends :

1. To facilitate understanding of a child and family
2. To improve work in progress with a child and family
3. To enable client(s) to develop personally and in their significant relationships

**3. PROCEDURE FOR USING VIG AND VIDEO RECORDINGS**

**3.1** VIG and the use of video recording is explained and discussed with children and parents at the beginning of the sessions in which recording is about to take place. Family members should have an opportunity to ask questions about this (see VIG Information Sheet).

**3.2** It should be explained to all family members at this stage that it is a temporary tool to help as part of a therapeutic intervention.

**3.3** All aspects of consent, access and storage should be explained to parents and their children at this stage.

**4. CONSENT FOR MAKING VIDEO RECORDINGS FOR VIG WORK**

 **4.1** Children and parents are informed that they can withdraw their consent for recording at any point during the session.

**4.2** The video recording does not commence until written consent is given from all present and/or verbally depending on their age and ability (see VIG Consent Form)

**4.3** It is advisable that the practitioner reads the consent form aloud to the family. If a child or parent is not willing for a recording to be made, then there will be no recording even if someone with parental responsibility consents.

**4.4** It is important to ensure that all family members have understood what it is they are consenting to and that a context is created for genuinely informed consent to take place.

**4.5** If a child is videoed in the context of a group, the practitioner(s) should obtain written parental consent before any recording occurs.

**5. ACCESS TO VIDEO RECORDINGS**

**5.1** The only persons who have access to video recordings include:

* The practitioner(s) as part of ongoing work and as part of VIG supervision of ongoing work.
* Supervisors external to New Beginnings who provide supervision to the practitioners.
* Colleagues in New Beginnings who are co-workers, supervisors, consultants or line managers with respect to this child and family.

# Anti-Corruption and Bribery Policy

Reviewed 18.12.23

Due to be reviewed: 18.12.24

**1. Introduction**

1.1  The New Beginnings Foundation CIO is committed to conducting business honestly without corrupt practices or acts of bribery, ensuring adherence to high legal and ethical standards. This must be reflected in every aspect of the way in which the charity operates.

1.2  In the UK, where the charity is registered, the Bribery Act 2010 not only makes bribery and corruption illegal, but will also hold us liable for failing to implement adequate procedures to prevent such acts by those working for the organisation or on its behalf, no matter where in the world the act takes place. Corrupt acts committed abroad, including those by partners or consultants working directly on our behalf for example, may result in a prosecution.

1.3  Bribery and corruption have a range of definitions in law, but the fundamental principles apply universally. Bribery is the offering, promising, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Corruption is the misuse of public office or power for private gain, or misuse of private power in relation to business. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and to incline them to act dishonestly.

1.4  Bribes can take on many different shapes and forms, but typically they involve corrupt intent. There will usually be a 'quid pro quo' – both parties will benefit. A bribe could be the:

•  direct or indirect promise, offering, authorisation or acceptance of anything of value

•  offer or receipt of any kickback, loan, fee, reward or other advantage

•  giving or receiving of aid, donations or voting designed to exert improper

influence.

1.5  The charity applies a “zero tolerance” approach to acts of bribery and corruption by any of our staff, volunteers, consultants, or by partners working on our behalf. Any breach of this policy will be regarded as a serious matter by the charity and, for employees, is likely to result in disciplinary action.

**2. Purpose**

2.1 The purpose of this policy is to:

•  set out the responsibilities of our staff, and others working on our behalf in observing and upholding our position on bribery and corruption, and

•  provide information and guidance to our staff and others working on our behalf on how to recognise and deal with bribery and corruption issues.

**3. Scope**

3.1 This policy applies to all the charity’s employees (staff, contract and temporary), sessional workers, peer mentors, volunteers, consultants, contractors and Trustees.

**4. Policy**

**4.1  Risk Assessment**

Effective risk assessment is at the very core of the success or failure of this policy. Risk identification pinpoints the specific areas in which bribery and corruption risks arise and enable better evaluation and mitigation of these risks. Appendix A provides some of the key risk factors to be considered when assessing the corruption and bribery risk faced by the charity.

**4.2  Effective Monitoring and Internal Control**

a. All parts of the charity must maintain an effective system of internal control and monitoring of our transactions. Once bribery and corruption risks have been identified and highlighted via the risk assessment process, procedures must be developed accordingly to mitigate these risks.

**4.3 Record Keeping**

a. It is imperative that accurate books, records and financial reporting are kept. Overall financial reporting must be maintained and be transparent. False, misleading or inaccurate records of any kind could potentially damage the charity.

**4.4 Facilitation payments and kickbacks**

a. In many countries, it is customary business practice to make payments or gifts of small value to government officials in order to speed up or facilitate a routine action or process. Despite this, facilitation payments as defined here are against this policy. The charity takes the view that they are illegal. The UK Bribery Act 2010 makes no distinction between facilitation payments and bribes – regardless of size or local cultural expectations, even if that is “how business is done here”. However, if staff are forced to pay under duress or faced with potential safety issues or harm, such a payment may be made. If such a situation arises, this should be reported immediately in accordance with the reporting procedures set out in paragraph 7.1 below.

**4.6 Gifts, Entertainment and Hospitality**

1. This policy does not prohibit acceptable and appropriate hospitality (given or

received) to or from third parties.

1. Please refer to the charity’s “Gifts and Hospitality Policy” for more information.
2. It is not acceptable for you (or someone on your behalf) to:

•  give, promise to give, or offer, a payment, gift or hospitality with the expectation that a business advantage will be received, or to reward a business advantage already given

•  give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure

•  accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them

•  accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return

•  threaten or retaliate against another working on our behalf who has refused to commit a bribery offence or who has raised concerns under this policy, or

•  engage in any activity that might lead to a breach of this policy.

**5. Your responsibilities**

5.1  You must ensure that you read, understand and comply with this policy.

5.2  The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working on our behalf. All such parties are required to avoid any activity that might lead to, or suggest, a breach of this policy.

5.3  You must report any suspicion that a conflict with this policy has occurred, or may occur in the future as soon as possible in accordance with the reporting procedure detailed in paragraph 7.2 below.

5.4  Appendix B provides a list of “Red Flags” you should be aware of that may indicate bribery or corruption.

5.5  Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

**6. Training and communications**

6.1 We will communicate this policy and relevant guidance to staff across the charity. Wherever possible we will also communicate this policy to our partners, contractors, suppliers and wider stakeholders. All employees will be expected to take responsibility for ensuring that they or anyone else acting on our behalf are made aware of this policy and our zero-tolerance approach to bribery and corruption.

**7. Raising concerns**

7.1  All those covered by this policy have a responsibility to help detect, prevent and report instances not only of bribery, but also of any other suspicious activity and wrongdoing. All initial concerns will be treated confidentially. However, as an investigation progresses it may not always be possible to fully protect the names of those raising concerns. Where this is a concern then the situation will be discussed with the people concerned before any action is taken.

7.2  It is very important to the charity that any concerns about abuse of this policy are raised. Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage by following the charity’s Whistleblowing procedure.

7.3  Victimising an employee for raising a legitimate concern will be a disciplinary offence as will maliciously or vexatiously raising a concern.

**8. Who is responsible for this policy?**

8.1  The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that those under our control comply with it.

8.2  The CEO and Project Lead has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

**9. Monitoring and review**

9.1 The charity will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate. It will periodically report the results of this process to the Trustees, who will make an independent assessment of the adequacy of the policy.

**10. Useful links**

10.1  The full Ministry of Justice Guidance and a more condensed “Quick start Guide” can be found at:

<http://www.justice.gov.uk/guidance/making-and-reviewing-the-law/bribery.htm>

10.2  The Bond “Anti-Bribery Principles and Guidance for NGOs” can be found at:

<https://www.bond.org.uk/resources/anti-bribery-guidelines>

**Appendix A: Corruption and Bribery risk factors**

The following is a list of risk factors that should be considered when assessing corruption and bribery risk within the organisation. The list is not intended to be exhaustive.

1. Geographical

Risks may be higher in certain countries or regions within countries. Activities in urban areas may pose different risks to activities in rural areas.

1. Cultural

In certain cultures and work environments, bribes may be seen as “business as usual”.

1. Sector
The nature of the sector in which an organisation works may pose specific risks.
2. Partners

Factors that may impact bribery risk include: size/structure/governance of partners; adequacy of partners’ control systems; partner selection processes; partnership contracts and agreements; and partners’ monitoring and support processes; political involvement or connections of partners.

1. Procurement

Increased risk where processes are not fair or transparent. Procurement is a high risk area for bribery.

1. Transactions

Certain transactions may carry higher risk; for example, payments to government officials, major contracts and payments through third parties.

1. Recruitment
Bribes can be offered or sought as part of recruitment processes.
2. New activities

There may be increased risk when organisations start new activities in which they have limited experience such as commercial operation

**Appendix B: Red Flags**

The following is a list of possible red flags that may arise during the course of you working for the charity and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for the charity, you must report

them promptly in accordance with paragraph 7.2 above:

1. You become aware that a third party engages in, or has been accused of engaging in, improper business practices
2. You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials
3. A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us
4. A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made
5. A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business
6. A third party requests an unexpected additional fee or commission to "facilitate" a service
7. A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services
8. A third party requests that a payment is made to "overlook" potential legal violations
9. A third party requests that you provide employment or some other advantage to a friend or relative
10. You receive an invoice from a third party that appears to be non-standard or customised
11. A third party insists on the use of side letters or refuses to put terms agreed in writing
12. You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided
13. A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us

# ANTI-HARASSMENT AND BULLYING POLICY

**Reviewed 18.12.2023**

**Due for review 18.12.2024**

**Introduction**

We are committed to having a workplace which is free from harassment and bullying. Also, to make sure that all employees, contractors, families and any others who come into contact with us in the course of our work, are treated with dignity and respect. This is without regard to gender, sexual orientation, transgender status, marital or family status, colour, race, nationality, ethnic or national origins, creed, culture, religion or belief, age, or disability.

We strive to make sure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is central to ensuring equal opportunities in employment. This policy and procedure is intended to support this commitment in practice and to provide guidance to staff on how to deal with concerns of bullying or harassment.

**Policy**

We will not tolerate bullying or harassment in our workplace or at work-related events outside of the workplace. This is regardless of whether the conduct is a one-off act or repeated course of conduct, and whether done purposefully or not. Neither will we tolerate retaliation against, or victimisation of, any person involved in bringing a complaint of harassment or bullying. Retaliation or victimisation will also constitute a disciplinary offence, which may in appropriate circumstances lead to dismissal.

You should also be aware that if a court or tribunal finds that you have bullied or harassed someone, in some circumstances the treatment may amount to a crime punishable by a fine or imprisonment. We will take appropriate action if any of our employees or contractors are bullied or harassed by our stakeholders or suppliers. Allegations of bullying and harassment will be treated seriously. Investigations will be carried out promptly, sensitively and, as far as possible, confidentially. If, after an investigation, we decide that an employee has harassed or bullied another employee or contractor, then the employee may be subject to disciplinary action, up to and including dismissal. Employees and others who make allegations of bullying or harassment in good faith will not be treated less favourably as a result.

False accusations of harassment or bullying can have a serious effect on innocent individuals. Staff and others have a responsibility not to make false allegations. False allegations made in bad faith will be dealt with under our disciplinary procedure.

**The type of treatment that amounts to bullying or harassment**

Bullying or harassment is something that has happened that is unwelcome, unwarranted and causes a detrimental effect. If employees complain they are being bullied or harassed, then they have a grievance which must be dealt with regardless of whether or not their complaint accords with a standard definition. For further information, please refer to [ACAS’ guidance](http://www.acas.org.uk/index.aspx?articleid=794).

It is important to recognise that conduct which one person may find acceptable, another may find totally unacceptable. All employees must, therefore, treat their colleagues with respect and appropriate sensitivity. Bullying does not include appropriate criticism of an employee’s behaviour or proper performance management.

**Reporting concerns**

**What you should do if you witness an incident you believe to be harassment or bullying:**

If you witness such behaviour, you should report the incident in confidence to the Project Lead. Such reports will be taken seriously and will be treated in strict confidence as far as it is possible to do so.

**What you should do if you feel you are being bullied or harassed by a stakeholder or supplier (as opposed to a colleague):**

If you are being bullied or harassed by someone with whom you come into contact at work, please raise this with the Project Co-ordinator in the first instance, and then the Project Lead. They will then decide how best to deal with the situation, in consultation with you.

**What you should do if you are being bullied or harassed by a colleague**

If you are being bullied or harassed by another employee or contractor, there are two possible avenues for you, informal or formal.

**Informal resolution**

If you are being bullied or harassed by another employee or contractor, you may be able to resolve the situation yourself by explaining clearly to the perpetrator(s) that their behaviour is unacceptable, contrary to our policy and must stop. Alternatively, you may wish to ask your line manager or the Project Lead to put this in writing on your behalf or to be with you when confronting the perpetrator(s).

If the above approach does not work or if you do not want to try to resolve the situation in this way, or if you are being bullied by your line manager or the Project Lead, you should raise the issue with the Chair of Trustees. The Chair of Trustees will discuss the option of trying to resolve the situation informally by telling the alleged perpetrator(s), without prejudging the matter, that:

* there has been a complaint that their behaviour is having an adverse effect on a fellow employee.
* such behaviour is contrary to our policy.
* the continuation of such behaviour could amount to a serious disciplinary offence.

It may be possible for the Chair of Trustees to have this conversation with the alleged perpetrator without revealing your name, if this is what you want. They will also stress that the conversation is confidential. In certain circumstances we may be able to involve a neutral third party (a mediator) to facilitate a resolution of the problem. The Chair of Trustees will discuss this with you if it is appropriate.

If your complaint is resolved informally, the alleged perpetrator(s) will not usually be subject to disciplinary sanctions. However, in exceptional circumstances (such as a serious allegation of sexual or racial harassment or in cases where a problem has happened before) we may decide to investigate further and take more formal action notwithstanding that you raised the matter informally. We will consult with you before taking this step.

**Raising a formal complaint**

If informal resolution is unsuccessful or inappropriate, you can make a formal complaint about the harassment or bullying to your manager or the Project Lead. A formal complaint may ultimately lead to disciplinary action against the perpetrator(s).

We will first investigate the complaint. You will need to co-operate with the investigation and provide the following details (if not already provided).

* The name of the alleged perpetrator(s).
* The nature of the harassment or bullying.
* The dates and times the harassment or bullying occurred.
* The names of any witnesses.
* Any action taken by you to resolve the matter informally.

The alleged perpetrator(s) would need to be told your name and the details of your complaint in order for the issue to be investigated properly. However, we will carry out the investigation as confidentially and sensitively as possible. Where you and the alleged perpetrator(s) work in proximity to each other, we will consider whether it is appropriate to separate you whilst the matter is being investigated.

After the investigation, we will meet with you to consider the complaint and the findings of the investigation. At the meeting, you may be accompanied by a fellow worker.

After the meeting (and normally within five working days), we will write to you to inform you of our decision and to notify you of your right to appeal to a more senior manager if you are dissatisfied with the outcome. You should put your appeal in writing explaining the reasons why you are dissatisfied with our decision.

You should submit your appeal within five working days of receiving written confirmation of our decision. If you submit an appeal, you will be invited to attend a meeting to consider it. Once again you may be accompanied by a fellow worker. We will write to you afterwards to confirm our final decision.

**Disclosure and confidentiality**

We will treat personal data collected during this process in accordance with the data protection policy.

**Use of the disciplinary procedure**

Harassment and bullying constitute serious misconduct. If, at any stage from the point at which a complaint is raised, we believe there is a case to answer and a disciplinary offence might have been committed, we will instigate our disciplinary procedure. Any employee found to have harassed or bullied a colleague will be liable to disciplinary action up to and including summary dismissal.

# LEARNING AND DEVELOPMENT POLICY

**Reviewed** 18.12.23

**Due to be reviewed**: 18.12.24

New Beginnings Foundation CIO recognises that its most important resource is its staff. We are committed to staff learning and development, in line with available resources.

Appropriately trained and skilled staff will be able to assist New Beginnings to achieve our objective of providing specialised, high quality care and rehabilitation to vulnerable people.

Individual learning and development needs will be identified mainly through the staff supervision and appraisal process. Once identified, these needs will form a part of New Beginnings Foundation annual learning and development plan.

The learning and development needs identified will be met through a variety of activities.

These activities may include:

* shadowing another member of staff
* planned reading
* working through a computer-based package
* off-the-job training
* a qualification
* mentoring
* coaching.

All internal training provided will be of no cost to the staff. External courses and professional qualifications may be fully or partly funded, depending on the following criteria:

* The relevance to the job
* The funds available
* Whether the learning need can be met in another way

It is expected that when New Beginnings funds external training for a staff or participant member, that the training is attended and completed. Staff are asked to provide feedback on the value and effectiveness of the learning and development activity they undertake, so that it can be further improved for the future.

This policy applies to all staff and participants in the programme.

**SERIOUS INCIDENT REPORTING POLICY AND PROCEDURE**

**Reviewed:** 18.12.23

**Due to be reviewed**: 18.12.24

**1   Introduction**

1.1    The purpose of this policy is to ensure that all staff and participants of New Beginnings are able to identify serious incidents, escalate them as appropriate and report them internally so that the Trustees can exercise adequate oversight and consider whether to make a serious incident report to the Charity Commission for England and Wales (the “**Commission**”) among other potential actions.

1.2    **The staff and participants of New Beginnings** means (i) all people working for the Charity or on the Charity’s behalf in any capacity; (ii) any person in receipt of funding from the Charity; and/or (iii) any person working on the New Beginnings project. For the avoidance of doubt ‘the staff and participants of New Beginnings’ includes but is not limited to members at all levels, trustees, seconded staff, sessional workers, volunteers, students, contractors, external consultants, third-party representatives (i.e. University Liaison Managers and Technical Academic Leads), fellows, researchers, and students.

1.3  In particular, this policy sets out how the Charity seeks to ensure compliance with the Serious Incident Reporting (“**SIR**”) requirements of the Commission which are set out in guidance available on its website (the “**SIR Guidance**”).

1.4    This policy applies to ‘the staff and participants of New Beginnings’. Failure to adhere appropriately to the policy will be treated as a very serious matter and may result, in the case of staff, in disciplinary action for gross misconduct or, in the case of contractors or other New Beginnings people who are not staff, in contract termination. If you are not working under a contract (for example, you are a volunteer or Trustee), a breach of this policy may mean that we have to ask you to cease being a volunteer or Trustee.

1.5    Although the Charity’s Trustees may delegate the responsibility for making reports of serious incidents to a senior member of staff, the Trustees remain ultimately responsible for ensuring that the Charity reports any serious incidents and that it does so in a timely manner.

**2    The duty to report a serious incident**

2.1    Although there is no statutory requirement under charity law for charities to report serious incidents as they occur, registered charities with an income over £25,000 per year must confirm in their annual return that there have been no serious incidents or other matters that Trustees should have reported to the Commission but have not done so. The Commission also considers that, as a matter of good practice, all charities regardless of size or income should report serious incidents to the Commission promptly.

2.2    The Charity’s Trustees and management take serious incidents and threats to the Charity very seriously and consider that reporting serious incidents to the Commission and other relevant authorities comprises an important part of the effective and appropriate response to any such incident.

2.3  In particular, the Charity understands that reporting a serious incident to the Commission demonstrates that it has the appropriate processes in place to manage risk and take the correct action. Where a report is made, it can also limit the likelihood that the Commission will take any formal regulatory or enforcement action.

2.4    If the Charity fails to report a serious incident that subsequently comes to light, the Commission may consider this to be indicative of mismanagement in the administration of the New Beginnings Foundation Charity as a charity and may ask the Charity to explain why it was not reported at the time. The failure to report a serious incident could prompt or add to the seriousness of regulatory action, particularly if further abuse or damage has arisen following the initial incident.

2.5    The potential for reputational damage can also be lessened if the Charity is able to show that any serious incident has been handled appropriately.

**3    What is a serious incident?**

3.1    The Commission defines a serious incident in its SIR Guidance as an adverse event, whether actual or alleged, which results in or risks significant:

(a)    harm to a charity’s beneficiaries, staff, volunteers or others who come into contact with the charity through its work;

(b)    loss of a charity’s money or assets;

(c)    damage to a charity’s property; and/or

(d)    harm to a charity’s work or reputation.

“Significant” means significant in the context of the charity, taking account of its staff, operations, finances and/or reputation. The SIR Guidance identifies the following main categories of reportable incidents:

3.2    The SIR Guidance identifies the following main categories of reportable incidents:

3.2.1    protecting people and safeguarding incidents – incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with the charity through its work (this includes incidents of abuse or mistreatment (actual or alleged) and a breach of procedures or policies which has put people who come into contact with the charity at risk, including failure to carry out checks which would have identified that a person is disqualified in law from holding their position within the charity e.g. under safeguarding legislation, from working with children or adults);

3.2.2    financial crimes: fraud, theft, cyber-crime and money laundering;

3.2.3    large donations from an unknown or unverifiable source, or suspicious financial activity using the charity’s funds;

3.2.4    other significant financial loss;

3.2.5    links to terrorism or extremism, including ‘proscribed’ organisations, individuals subject to an asset freeze, or kidnapping of staff; and

3.2.6    other significant incidents, such as:

(a)    a Trustee or a senior manager being disqualified from holding that position;
(b)    something has happened to force the charity into insolvency or to wind up;
(c)    forced withdrawal of banking services and difficulties securing alternative accounts;
(d)    the charity is subject to a police investigation or a significant investigation by another agency/ regulator (the SIR Guidance states that a charity does not need to report routine regulatory inspections unless they resulted in significant adverse findings that place the future of the charity in doubt, are likely to damage the charity’s reputation or public confidence in the charity, or relate to any of the other categories of serious incidents);
(e)    major governance problems, such as mass resignation of staff or trustees, or other events, leaving the charity unable to operate;
(f)    the charity’s trustees or members of staff are the subject of criminal proceedings, in connection with the charity or their role in it;
(g)    there has been a significant data breach or loss within the charity; and
(h)    an incident has occurred involving one of the charity’s partners in the UK or internationally which materially affects the charity, its staff, operations, finances and/or reputation (this includes delivery partners, subsidiary companies, funding recipients and organisations linked to the charity (for example as part of a federated structure).

3.3    The Commission recommends that any incident or matter which could get into the public domain or be reported in the media is reported to it as soon as possible (even if initially on an interim basis) so that the Commission can prepare its own public response and be in a position to say that it is already liaising with the charity in relation to it.

3.4    The SIR Guidance provides more details about the types of matters that should be reported and also includes a table of examples of matters that usually should or should not be reported. This Policy and the SIR Guidance are not exhaustive and matters may still constitute serious incidents if they do not fall within any of the categories identified above. If in doubt as to whether something constitutes a serious incident, you should discuss it with the Relevant Officer where applicable (see below) or otherwise with the General Counsel.

**4    Reporting principles and procedures**

4.1    The Charity will provide training to those who work for it (including Trustees, staff and volunteers) so that they can identify serious incidents and know what to do if one occurs.

**Internal reporting by New Beginnings staff and participants**

4.2    The staff or participants at New Beginnings should not seek to make a serious incident report to the Commission themselves. Instead, they should report their concerns internally in accordance with the relevant policy so that appropriate action can be taken.

4.3    The following are some of the Charity’s policies which relate to contexts in which serious incidents may arise. This is not an exhaustive list:

* (a)    Policies relating to financial crime such as the Counter Fraud, Anti-Bribery and Anti-Corruption Policy;
* (b)    Information Security Policy;
* (c)    Policies relating to children, safeguarding and vulnerable adults;
* (d)    Complaints Policy;
* (e)    Whistleblowing and raising concerns policies; and
* (f)    Information security incident management policy.

4.4    Where a serious incident is covered by a New Beginnings Foundation policy, staff and participants should use the mechanism set out in the relevant policy and report the incident to the individual named in that policy (the “Designated Officer”). In the unlikely event that an incident is not covered by an existing New Beginnings policy, staff should report the incident to the Chief Executive Officer, Jadwiga Leigh, jadwiga@nbfoundation.co.uk as soon as possible and in any event within 24 hours.

4.5    Where an incident relates to the Chief Executive Officer, staff or participants should report the incident or allegation directly to the Chair of Trustees: Ann Potter ann@nbfoundation.co.uk

4.6  Upon receiving a report, the Relevant Officer or Chief Executive Officer will assess whether they think it may potentially be a serious incident and if so, will promptly (on the same day) report the incident to one or more of the Charity’s Trustees.

4.7  The Trustee receiving the report will discuss the matter with the nominated Trustee in order to determine next steps. However, there may be circumstances where this is not appropriate due to reasons of confidentiality, conflict of interest/loyalty etc, in which case the nominated Trustee or alternative nominated Trustee (if the nominated Trustee is not available or conflicted) will decide how to deal with the matter, taking account of any relevant policies and procedures and taking advice as appropriate.  Consideration should be given as to whether any particular steps can be taken to address particular issues e.g. whether the report could be appropriately anonymised before sharing with the wider Audit and Risk Committee and the Board of Trustees generally.

**Reporting to the Commission**

4.8    The Trustees via the Audit and Risk Committee will respond to serious incidents promptly, in a comprehensive and systematic manner; will assure themselves that all appropriate steps have been or are in process; and will seek to prevent or minimise any further harm, loss or damage.

4.9    Assessing whether a reportable serious incident has occurred is a matter for the Trustees, who have delegated this responsibility to the Audit and Risk Committee  to determine, having reviewed and considered the SIR Guidance and any related Commission documents or other guidance, and they may seek advice from professional advisers before doing so.

4.10    The Audit and Risk Committee will report serious incidents to the Commission promptly. The urgency of reporting will depend on factors including the nature and seriousness of the incident, the potential impact on the Charity and whether it is likely that there will be media coverage of the incident.

4.11    The SIR Guidance notes that it is important to provide enough detail in the report to give the Commission a clear picture of what happened and when, the extent of any loss or harm, how the charity is dealing with it and the planned/possible next steps (see below for further details of the information to provide in the report).  The Audit and Risk Committee will liaise with relevant staff to gather the appropriate information required to report the matter to the Commission.

4.12    It is important to balance the fact-finding exercise with the need to report incidents promptly. Some discretion may need to be exercised in these circumstances. It will always be open to the Charity to make an initial report to the Commission covering those facts that are known to the Charity to date, and provide further updates to the Commission following internal investigation or as matters develop, including regarding the actions which have been taken to respond to and manage the incident. The Charity notes that the SIR Guidance says that if, having submitted a report to the Commission, the charity becomes aware of any material changes to the facts reported or significant developments, the charity must inform the Commission as soon as it becomes aware of them.

4.13    The Audit and Risk Committee may delegate responsibility for reporting a serious incident to a senior member of staff – any delegation should be clear about the scope of the report, Trustee oversight of it and the deadline for submission. The SIR Guidance makes it clear that decisions made by others should be reported back to Trustees, particularly where incidents were ‘borderline’ and the charity considered making a report but decided not to.

4.14    The serious incident report should be filed by emailing **RSI@charitycommission.gsi.gov.uk** or such other address or method of reporting as the Commission may from time to time require.

4.15    Unless a specific reporting framework has been agreed with the Commission, the following information should be included in the report:

(a)    the individual submitting the report and their connection to the Charity ;
(b)    the authority they have to report on behalf of the Trustees;
(c)    who within the Trustee body is aware of the incident, for example all Trustees, some of them or only the nominated Trustee;
(d)    what happened and when the Charity first became aware of it – to the extent that information may identify individuals in sensitive circumstances, the level of detail may be tailored accordingly. It is not necessary to provide names of individuals involved in the initial report – the Commission will request this information if it needs it. However, the account should otherwise be fully candid and should not be expressed in general terms or euphemistically;
(e)    the effect of the incident on the Charity or its beneficiaries or both;
(f)    action being taken to deal with the incident and prevent consequential risks and future occurrences (this will likely include details of any investigations by the Charity (whether complete or underway); whether the Charity has any policies or procedures that apply to the incident in question and whether they were followed including any reasons why they were not followed (if applicable); and whether as a result the Audit and Risk Committee have determined that current policies or procedures need to be revised, or new ones put in place if they do not already exist);
(g)    whether and when it was reported to the police or another regulator/statutory or other agency (including official reference numbers) and any action taken, whether any guidance was offered and the extent to which it has been followed. In circumstances where, upon careful risk assessment, it has been determined that it would not be appropriate to report to external authorities (such as, but not limited to, the wishes of the victim/survivor/complainant; potential harm to the victim/survivor/complainant; justifiable concerns in relation to the due process with which the matter would be treated), a summary of the reasons for that determination should be included in the report and the decision and reasons should otherwise be carefully documented;
(h)    media/donor/patron/public relations handling plans that have been or will be prepared by the Charity , if any;
(i)    insurance coverage, if any, and notification to and/or correspondence with the insurers where relevant;
(j)    any other review or investigation that will take place as a result of the incident or allegation, including in respect of governance arrangements, contracts with third parties or policies and procedures; and
(k)    specifying whether the information is confidential and/or may risk identification of individuals if disclosed externally.

**Other actions to take**

4.16    The Charity will prepare a communications plan covering what it will say to New Beginnings beneficiaries, members, supporters, the public and the media.

4.17    Consideration should be given to whether it is appropriate to obtain external advice, such as legal and/or communications advice.

4.18    The Charity will review what happened and identify and take steps to prevent it from happening again - this may include strengthening internal controls and procedures, and/or seeking appropriate help from professional advisers.

4.19    Consideration must also be given to whether a serious incident should be reported to the Charity ’s insurers in accordance with the relevant insurance policy (if any).

4.20    In addition to making a serious incident report to the Commission, if the incident occurred in the UK, it may be necessary to inform or make reports to other relevant regulators or agencies. The Charity should report:

* (a)    crime, or suspected crime, to the police and obtain a crime reference number;
* (b)    any incidents of harm or risk of harm to children or vulnerable adults (including any concerns, suspicions or allegations) to the relevant local authority and obtain a reference number;
* (c)    incidents of fraud and cyber-crime that take place in connection with the Charity to Action Fraud and obtain a crime reference number;
* (d)    any serious data breaches to the Information Commissioner’s Office; and
* (e)    any incidents relating to possible terrorist financing offences to police or the National Crime Agency (“**NCA**”) and obtain a reference number.

4.21    Where there is actual or suspected criminal activity or other serious incident that has occurred in another country, the Charity will ensure that it is made aware of the requirements of local law and regulation, including in respect of reporting. The Charity will carefully consider and risk assess the making of such a report to the police and/or to any other regulators or authorities to which the Charity is accountable or which otherwise have jurisdiction in relation to the matter. This will include consideration of the risk of harm to others (such as the victim and alleged offender) if the incident is reported and cultural differences and sensitivities.  To the extent that it is determined, after careful consideration, not to report an incident to the national or regional authorities of another country, the decision will be carefully documented and reasons provided to the Commission when the serious incident report is made. Where an alleged offender is a UK national or resident, consideration will be given to reporting to the NCA.

**The Charity must carefully consider and have due regard to any and all advice given by statutory or other bodies in relation to its handling of the incident or allegation. It must be carefully and securely documented and explained to the Commission in the serious incident report made.**

**5    What happens next?**

5.1    The Commission will typically acknowledge receipt of the report. It is understood that it will assess the risk and look at how the Charity is dealing with the incident, and may take steps to verify the details, for example and where relevant, by contacting the police. The Commission may also follow up if it:

* (a)    needs more information about the incident;
* (b)    considers the Charity’s needs regulatory advice and guidance;
* (c)    has to use its legal powers to protect the Charity and/or the people who come into contact with the Charity through its work;
* (d)    decides to request updates on future development; and
* (e)    needs to monitor the Charity’s progress in dealing with it.

5.2    In very serious cases the Commission may take steps to exercise its enforcement powers, for example, issuing a warning or opening a statutory inquiry into the Charity, though it is rare that it would do so without some form of preliminary communication or dialogue.

**6    Data protection and confidentiality**

6.1    When Trustees report serious incidents, some of the information provided may be of a sensitive nature. The Commission is obliged to handle this responsibly, with care and only for the purposes of carrying out its statutory functions.

6.2    As a public authority and a ‘controller’, the Commission is subject to the Freedom of Information Act 2000, the Data Protection Act 2018, and the General Data Protection Regulation (EU) 2016/679 (and any other law and related guidance as may subsequently be in force).

6.3    The Commission’s SIR Guidance states that the Commission does not routinely guarantee that information provided will be kept confidential, because information sharing is often necessary in order for the Commission to further its statutory functions and objectives and in some cases it is required by law to share information (e.g. to other relevant public authorities).

6.4    Despite this, all serious incident reports should be marked as confidential (unless the information is already wholly available in the public domain, which is highly unlikely). In addition:

* (a)    any personal data should be removed to the greatest extent possible and, if appropriate, the risk of identification of individuals (though unnamed) should be highlighted;
* (b)    any particularly sensitive information in the report should be identified;
* (c)    any specific exemptions from disclosure (such as an exemption under the Freedom of Information Act) should be specifically referred to and relied upon; and
* (d)    the report should contain a request that it is not disclosed to third parties and that the Commission notifies the Charity if it receives a request to disclose information to third parties (e.g. the media or individuals).

**7    Learning from serious incidents**

7.1    It is important that the Charity appropriately manages and responds to a serious incident. This includes learning from the incident and taking steps to minimise further harm in consequence of the incident and to prevent similar incidents from occurring in the future.

7.2    Senior employees and Trustees should consider whether the Charity has taken appropriate steps to respond to a serious incident and ensure that sufficient controls and procedures are put in place to mitigate and manage any future risks to the Charity and its beneficiaries. This should be documented.

# CONFLICT OF INTEREST POLICY FOR TRUSTEES, STAFF, VOLUNTEERS AND PARTICIPANTS OF NEW BEGINNINGS

**Reviewed** 18.12.23

**Due to be reviewed**: 18.12.24

**Introduction**

This policy applies to all trustees staff, volunteers, and participants of New Beginnings Foundation CIO.

**Why we have a policy**

Trustees have a legal obligation to act in the best interests of New Beginnings, and in accordance with New Beginnings governing document, and to avoid situations where there may be a potential conflict of interest. Staff, volunteers, and participants have similar obligations.

Conflicts of interests may arise where an individual’s personal or family interests and/or loyalties conflict with those of New Beginnings.

Such conflicts may create problems that:

• inhibit free discussion;
• result in decisions or actions that are not in the interests of New Beginnings

• risk the impression that New Beginnings has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

**The declaration of interests**

Accordingly, we are asking trustees, staff, volunteers and participants to declare their interests, and any gifts or hospitality offered and received in connection with their role in New Beginnings. A declaration of interests form is provided for this purpose below, listing the types of interest you should declare.

To be effective, the declaration of interests needs to be updated at least annually, and when any material changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Chair of Trustees, Ann Potter, ann@nbfoundation.co.uk for confidential guidance.

This register of interests shall be used to record all gifts of a value over £1000 and hospitality over £1000 received by the trustees, staff, volunteers and participants. Interests and gifts will be recorded on the charity’s register of interests, which will be maintained by the Chair of Trustees. The register will be accessible on request.

**Data protection**

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that trustees, staff, volunteers and participants act in the best interests of the Charity.

The information provided will not be used for any other purpose.

**What to do if you face a conflict of interest**

If you believe you have a real or perceived conflict of interest you should:

• declare the interest at the earliest opportunity
• withdraw from discussions and decisions relating to the conflict.

The Chair of Trustees should take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the charity generally without disclosing such sensitive information that could place the individual in an untenable position.

If you are a participant of New Beginnings services, or the carer of someone who uses the charity’s services, you should not be involved in decisions that directly affect the service that you, or the person you care for, receive(s). You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion, unless expressly invited to remain in order to provide information. In this case you may not participate in, or influence, the decision or any vote on the matter. You will not be counted in the quorum for that part of the meeting and must withdraw from the meeting during any vote on the conflicted item.

There are situations where you may participate in discussions from which you could indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal. This action will be agreed by the chair and minuted accordingly.

If you fail to declare an interest that is known to Chair of Trustees, another member of the board trustees can declare that interest on your behalf.

**Decisions taken where a trustee or member of staff has an interest**

In the event of the board having to decide upon a question in which a trustee or member of staff has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be attained for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested board members may not vote on matters affecting their own interests.

All decisions under a conflict of interest will be recorded by the Chair and minute taker at the Board of Trustees meeting.

The report will record:

• the nature and extent of the conflict;
• an outline of the discussion; and
• the actions taken to manage the conflict.

Where a trustee benefits from the decision, this will be reported in the annual report and accounts in accordance with the current Charities SORP. All payments or benefits in kind to trustees will be reported in the charity’s accounts and annual report, with amounts for each trustee listed for the year in question.

Where a member of New Beginnings staff is connected to a party involved in the supply of a service or product to the charity, this information will be fully disclosed in the annual report and accounts. Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.

**Managing contracts**

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.

# Conflict of Interest Reporting Form

|  |  |
| --- | --- |
| **Category**  | **Please give details of the interest and whether it applies to yourselfor, where appropriate, a member of your immediate family, connected persons or some other close personal connection**  |
| Current employment and any previous employment in which you continue to have a financial interest.  |  |
| Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, tribunals etc.  |  |
| Membership of any professional bodies, special interest groups or mutual support organisations.  |  |
| Investments in unlisted companies, partnerships and other forms of business, major shareholdings [charities may set a figure here, e.g. more than 1% or 5% of issued capital] and beneficial interests.  |  |
| Gifts or hospitality offered to you by external bodies and whether these were declined or accepted in the last 12 months.  |  |
| Do you use, or care for a user of the organisation’s services?  |  |
| Any contractual relationship with the charity or its subsidiary.  |  |
| Any other conflicts that are not covered by the above.  |  |