



Volunteer Policies and Procedures

Contents

Introduction	3
Equal Opportunities Statement	4
Equality, Diversity, and Inclusion Policy	5
Volunteer Safer Recruitment and Selection Procedure	7
DBS/Rehabilitation of Ex-Offenders Policy	9
Volunteer Support and Supervision Policy	11
Volunteer Expenses Policy	13
References Policy	16
Volunteer Exit Policy	17
Data Protection & Information Sharing Policy.....	19
Confidentiality Policy	22
Communication and Information Sharing Policy.....	23
Roles and Responsibilities in Reporting Risk	24
Risk Assessment and Escalation Policy	25
Health and Safety Policy	29
Individual Contact Policy.....	31
Mobile Phone Policy	32
Media Policy.....	34
Social Media Policy (Volunteers)	36
Grievance and Disciplinary Policy	41
Whistleblowing Policy and Guidance.....	45
Safeguarding and Protection from Abuse Policy	49
Appendix 1 – A glossary of terms used.....	58
Appendix 2 – Definitions of abuse used against children and young people.....	60
Appendix 3 – Definitions of abuse against adults at risk.....	63
Appendix 4 – Circles SE Designated Safeguarding Officers	65
Appendix 5 – Circles South East safeguarding procedure flowchart.....	66
VOLUNTEER DECLARATION.....	67

Circles South East Volunteer Policies and Procedures

Introduction

Volunteering with Circles South East is a unique, challenging and rewarding way to help reduce the instances and impact of sexual abuse within local communities. Our various volunteering roles provide opportunities for individuals to contribute to community safety, working as part of a multi-agency effort to prevent sexual abuse, as well as assisting those who have been affected by sexual abuse in their recovery.

The work of the charity can provide both a challenging and rewarding experience for volunteers. We have been successful because of the commitment and dedication of our volunteers and most significantly because of the ability of volunteers to balance their responsibility to provide both support and accountability to the individuals they are working with.

These policies and procedures have been produced primarily to ensure the safety and wellbeing of all volunteers involved with the charity. It is important that volunteers adhere to the policies and procedures in order to maintain standards and best practice and to contribute to an effective working relationship with our partnership agencies.

Circles South East aims to provide cohesion and consistency to all elements of volunteering and to ensure that a safe, supportive and respectful environment is provided for all involved with the work of the charity.

Volunteers are provided with a copy of the policies and procedures on completion of the selection process and will be asked to sign a declaration prior to being allocated to a service. Failure to comply with these policies and procedures is taken seriously and may lead to the end of a volunteer's involvement with the charity. This document is reviewed on a regular basis and additions or amendments will be shared with volunteers and, if required, appropriate training will be provided.

There is something very special about volunteers who are committed to finding a constructive approach to making our communities a safer and more inclusive place. It is the team's responsibility to ensure that our volunteers are appropriately trained, managed and supervised and we hope this document will provide you with confidence and reassurance in your role as a Circles South East Volunteer.

Rebekah Saunders
Chief Executive

Equal Opportunities Statement

In accordance with the Equality Act 2010, Circles South East is committed to equal opportunities and non-discriminatory procedures and practices and this commitment extends to our volunteers. We will not discriminate against our volunteers on grounds of gender, sexual orientation, gender reassignment, marriage and civil partnership, disability or impairment, age, race, religion or belief, pregnancy or maternity or other similar bases.

Furthermore, we value difference, and recognise the value that the different backgrounds, skills, outlooks and experiences of our volunteers bring to the organisation.

We will not tolerate behaviour that contradicts the letter or spirit of this statement or our full Equality, Diversity, and Inclusion policy.

Equality, Diversity, and Inclusion Policy

Statement of Policy

The aim of this policy is to communicate the commitment of the Chief Executive and Board of Trustees to the promotion of equality of opportunity within Circles South East.

If we do not see the differences between people, we cannot know them as they really are. If we do not see people as they really are, we cannot provide them with high quality services, nor can we be a good employer. Where we see the value in diversity we can benefit. We are diminished by not recognising and valuing the talents and background of the people with whom we work.

It is our policy to provide equality to all, irrespective of:

- Gender
- Pregnancy and maternity
- Religion or belief
- Race (including colour, nationality, ethnic or national origins)
- Disability or impairment
- Sexual orientation
- Age
- Gender reassignment
- Marriage and civil partnership

We are opposed to all forms of unlawful and unfair discrimination. All individuals involved with the work of the charity will be treated fairly and will not be discriminated against on any of the above grounds. Decisions about recruitment and selection, employment terms and conditions, promotion, training, salary and benefits, redundancy or dismissal will be made objectively and without unlawful discrimination.

Our equal opportunities policy will help all those involved in the work of Circles South East to develop their full potential, and the talents and resources of the workforce will be utilised fully to maximise the efficiency of the organisation.

To Whom does the Policy Apply?

The Equal Opportunities Policy applies to all of those involved with the work of Circles South East, including:

- Job applicants and prospective employees
- All employees, including sessional/casual staff
- Contract or agency workers
- Trainee workers and students on placements
- Volunteers and prospective volunteers

It is an expectation of the charity that all those involved in the work of the charity will respect and act in accordance with this policy. Any bullying or harassment within the workplace is unacceptable and will be subject to the appropriate disciplinary action (see Grievance and Disciplinary Policy for further details).

Equality Commitments

Circles South East is committed to:

- Promoting equality of opportunity for all persons
- Promoting a positive and harmonious working environment in which all persons are treated with respect
- Preventing occurrences of unlawful discrimination, bullying, harassment and victimisation
- Fulfilling all our legal obligations under the Equalities Act 2010
- Complying with our own equal opportunities policy and associated policies
- Taking swift action where a potential breach of our equal opportunities policy has been identified
- Thoroughly investigating all breaches, initiating grievance and disciplinary proceedings where necessary.

The full version of this policy will be made available upon request.

Volunteer Safer Recruitment and Selection Procedure

Purpose

Volunteers are recruited through a number of sources including internet advertising, community presentations and word-of-mouth. Circles South East's volunteer recruitment and selection procedures are designed to ensure that volunteers can make an informed choice as to whether this is a role appropriate for them, and that the Charity is satisfied that only appropriate volunteers are selected to work within our services

1. Initial enquiries

Upon receipt of an initial enquiry from a potential volunteer we will respond with an application form and additional information leaflets about the work of the Charity. Once a completed application form is returned, Circles South East will submit reference requests to the two identified referees/supporters named on the application. The potential volunteer will also be contacted by a Coordinator who will undertake a brief application interview via telephone and an invitation to attend initial volunteer training will be sent to the potential volunteer.

2. Training

Potential volunteers will then be required to attend an initial training event which will take place across a number of days. The initial training consists of multiple interactive training units delivered in person and/or online, some pre-unit work, additional reading and a post-training interview. Training has been designed to allow potential volunteers to make an informed decision regarding volunteering for Circles South East. Equally, the training process enables staff to assess an individual's suitability to volunteer for Circles South East. This training is interactive and there is an expectation that volunteers engage actively and meaningfully. Further training may be required depending on the specific volunteering opportunity/service.

3. Post-training

Following successful completion of the initial training event, all potential volunteers will be interviewed by a Coordinator on a one-to-one basis. This post-training interview is the point at which a provisional decision is made regarding the suitability of the potential volunteer. The post-training interview should also be used to discuss practical issues including availability and travel (as relevant), as well as any sensitive personal issues linked to volunteering that the potential volunteer may wish to discuss. At this stage a volunteer will also be issued with a Volunteer Agreement which they must sign and return. Volunteers will not be placed into an active volunteering role until they have also signed an acknowledgement form attesting reading, understanding and adherence to the Volunteer Policies and Procedures pertaining to work with Circles South East.

4. Disclosure and Barring Service (DBS)

The potential volunteer will be required to complete a Disclosure and Barring Service (DBS) form, processed at an enhanced or standard level (as appropriate depending on the volunteering opportunity/service) and provide relevant forms of identification as part of

the interview process. Potential volunteers are expected to disclose any criminal convictions which are not spent, along with any information which may have an impact upon their volunteering. This could include any ongoing police investigation or relationship to/with someone with a conviction for sexual offences. This information may not necessarily exclude an individual from volunteering with Circles South East and each potential volunteer's personal circumstances will be considered sensitively and fairly. In such circumstances, a member of Circles South East's Senior Management Team will make a final decision as to whether the potential volunteer will be selected. (Please see Circles South East DBS/Rehabilitation of Ex-offenders policy).

Only once this process has been completed will a potential volunteer be considered for a service. Their DBS certificate needs to have been received and approved.

Counselling Service

All of the above applies to Counselling Service volunteers. While the Induction Training for Counselling Volunteers differs from that of other project Volunteers, its purposes are similar, in that we seek to introduce volunteers to the Charity, aims and objectives, and the environment in which we work. Attendance on the training carries with it no commitment to join the Charity, and likewise we are assessing Counselling Volunteer suitability.

Regarding the Post-Training section above, qualified counsellors will be required to provide details of their qualification, supervisor, insurance and professional organisation membership, together with assurance that they have completed a minimum of 50 hours of clinically supervised counselling. Those who are currently studying for counselling qualifications will need to provide details of the course they are attending, insurance, supervisor and professional organisation membership.

DBS/Rehabilitation of Ex-Offenders Policy

Purpose

The [code of practice](#) published under section 122 of the Police Act 1997 advises that it is a requirement that all registered bodies must treat DBS applicants who have a criminal record fairly and not discriminate automatically because of a conviction or other information revealed.

The code also obliges registered bodies to have a written policy on the recruitment of ex-offenders; a copy of which can be given to DBS applicants at the outset of the recruitment process.

Scope

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), Circles South East complies fully with the [code of practice](#) and undertakes to treat all applicants for positions fairly.

Aims

Circles South East undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

Legal requirements

Circles South East can only ask an individual to provide details of convictions and cautions that Circles South East are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested - where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate (Police Act Regulations as amended).

Circles South East can only ask an individual about convictions and cautions that are not protected.

DBS requirements and process

Circles South East is committed to the fair treatment of its staff and volunteers, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

Circles South East actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.

Circles South East selects all candidates for interview based on their skills, qualifications and experience.

An application for a criminal record check is only submitted to DBS after a thorough assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.

Circles South East ensures that all those in Circles South East who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

Circles South East also ensures that they have received appropriate guidance in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, Circles South East ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment or volunteering.

Circles South East makes every subject of a criminal record check submitted to DBS aware of the existence of the [code of practice](#) and makes a copy available on request.

Circles South East undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment or volunteering.

Volunteer Support and Supervision Policy

Purpose

The purpose of this policy is to provide a framework for the delivery of comprehensive, consistent and good quality supervision and support for all our volunteers working with Service Users. Individual projects may have specific supervision requirements within Codes of Practices that they are required to adhere to. This Policy aims to summarise Circles South East's approach to supervision and support of volunteers and identify where variation may exist within individual projects.

Supervision and Support of Volunteers

The support and supervision of volunteers at Circles South East is of utmost importance. Providing volunteers with good quality support is key to enabling them to fulfil their role in an effective and confident manner.

When volunteers take on active volunteering roles, they will be assigned a Coordinator who is responsible for conducting supervision with them on a regular basis. The exact frequency of this supervision may depend on a number of factors (for example the level of support required by the volunteer, the requirements within relevant Codes of Practice/Ethics etc). However there is an expectation that supervision will be provided on a regular basis and that this schedule is to the satisfaction of both the volunteer and the Coordinator. Where there are concerns or where additional support may be required, the frequency of supervision, support and level of Coordinator oversight is expected to increase.

Coordinators will be responsible for scheduling supervision sessions with their volunteers, but how this takes place is to be decided by both parties. This can take place in person or remotely depending on personal preference. When working as part of a group, this should be a group decision. Supervision sessions will be minuted and copies will be provided to all individuals involved. Supervision minutes will be stored securely and will only be accessed by the individuals who were engaged in the supervision session, unless there is a concern about welfare, performance, risk or other significant concern or with the prior permission of the individuals involved. If supervision notes are shared this will only be with the necessary individuals and any unnecessary information that does not need to be shared will be redacted.

Alongside formal supervision sessions, volunteers in active volunteering roles are provided with ongoing informal support from their Coordinator. This may include email, telephone or MS Teams contact/conversations. Volunteers should remain in contact with their Coordinator regularly so that support can be provided throughout their time volunteering with Circles South East.

In the event that a volunteer experiences difficulties and requires additional advice or support they can contact their Coordinator during office hours. If the Coordinator is not available for any reason, volunteers can contact the Circles office (tel: 01235 816050) and

request to speak with another Coordinator. Should a volunteer require urgent advice or support outside of usual office hours Circles South East operates an Out of Hours telephone line. The line operates Monday to Friday 5.00pm until 9.00pm. The Out of Hours telephone number is 0300 303 0781.

Should any volunteer feel they need or would like additional support – be that informal support, formal supervision or personal support through interventions such as counselling – they are encouraged to request this via their Coordinator.

Supervision of Standard Adult/Youth Circle Volunteers

In compliance with the Circles UK Code of Practice, supervision for Standard Adult Circle volunteers should take place every three months during Phase 1. Youth Circles Volunteers are required to engage in monthly supervision sessions whilst they are part of a Circle. The Coordinator will arrange to meet with the Circle volunteers as a group in order to carry out a group supervision session.

Coordinators will also contact each Circle volunteer individually to provide an opportunity to discuss any issues that they may not wish to raise in a group setting. Although not routinely provided, one-to-one supervision sessions can be requested at any time by either the volunteer or the Coordinator. An example of this might be if there is a profound disagreement between Circle volunteers.

Supervision of Counselling Volunteers

Supervision for qualified counselling volunteers should take place at least once a month whilst they are providing a counselling service and according to BACP/NCS (or similar) Code of Ethics. Supervision to counselling volunteers who are students has to take place according to requirements of their professional and educational bodies.

Circles South East can provide supervision free of charge to counselling volunteers but supervision provided can only relate to Circles clients. If the counselling volunteer prefers to arrange their own supervision it is their responsibility to arrange regular supervision and Circles South East will contribute towards the cost relating to Circles clients (up to £50 per session).

Supervision of Volunteers within Other Projects

Circles South East delivers a variety of different projects aside from those noted above. Each project will have individual requirements regarding the frequency of and processes related to the provision of volunteer supervision. Volunteers should contact their Coordinator if they are unclear about their own supervision expectations.

Volunteer Training

In addition to attending initial volunteer training, all volunteers will be required to complete mandatory refresher training at the request of their Coordinator. Supplementary training on a variety of relevant topics will be made available throughout the year.

Volunteer Expenses Policy

Volunteers are eligible to claim for travel and other reasonable out-of-pockets expenses incurred (such as parking), whilst carrying out their role as a volunteer. These include the following:

- Attending face to face meetings with Service Users
- Attending supervision sessions and review meetings
- Attending Circles South East training events and conferences
- Attending approved social meetings with the Service User (see social events info below)
- The provision of refreshments for face to face meetings (see refreshments info below)

There may be occasions where expenses are authorised for other costs, such as paying for Service mobile phone top-ups (see Mobile Phone Policy for more details) or attending external training events and conferences. In such instances approval must be sought in advance from the Coordinator.

Travel

The agreed maximum allowance for travel for volunteers attending face to face Service User meetings is up to 25 miles each way. Circles South East may on occasion authorise payment for travel of over 25 miles, but this will need to be approved in advance by a member of the Senior Management Team upon the request of a Coordinator. This will be paid in accordance with the rate set and agreed by the Board of Trustees and will be reviewed annually.

Public transport and acceptable subsistence costs will only be reimbursed on submission of the relevant tickets and receipts. Volunteers travelling on the London TFL system who are making contactless payments should speak to their Coordinator for clarification regarding how to claim any expenses incurred. Acceptable subsistence costs are those incurred in the course of formal and informal Service User meetings, supervision and review meetings. Please note that Circles South East will not reimburse the cost of alcohol which should not be consumed during either formal or informal Service User meetings.

Refreshments

When meeting in a private booked venue:

When a meeting is taking place in a paid-for room and when that venue allows use of a kitchen then the Coordinator will provide the basics to start the Service - tea/coffee/milk/cordial. Volunteers can claim for replacements, but any additional items such as alternative drinks or any food items will not be reimbursed. Receipts must be provided to support any claims for replacements.

There are some paid-for venues that don't allow people to use their kitchen and instead offer paid-for refreshments. In this case the Coordinator will check with the

volunteer(s)/Service User whether they would like refreshments, and if so the Coordinator will book refreshments when booking the room, this will be for the provision of tea/coffee/milk. Any food items (if allowed by the venue) should be provided/paid for by the volunteers/Service User themselves.

When meeting in a public venue:

When meeting in a coffee shop/cafe instead of hiring a room there is a saving of the room hire fee and we recognise there is an obligation to make a purchase. In this case we will reimburse one drink per person up to a maximum of £5 per person including the Service User. Any additional drinks, items or further costs will be paid for by the volunteer(s)/Service User themselves.

When meeting in a coffee shop/café, volunteers have flexibility to either pay for and claim back for their own drink, or pay for and claim back for more members of the group (themselves, plus the Service User and/or other volunteers). This is down to personal preference and circumstances. The volunteer must submit a receipt with their claim and clearly state on the expenses claim form how many of the groups drinks were paid for (eg “hot drinks for 4 volunteers and 1 Service User”). Where the cost of a purchase equates to more than £5 per individual, Circles South East will only approve and reimburse for £5 per individual and the remaining cost will be covered by the volunteer themselves.

It is the responsibility of the volunteer to clearly state what refreshments are being claimed for on their expense form, and it is the responsibility of the Coordinator to check these claims and ensure they comply with the policy before approving them.

If there is any uncertainty over what is or is not acceptable subsistence, or if receipts are not available, please contact your Coordinator.

Circles South East values the time that volunteers give to their Service Users for free and we do not believe volunteers should be out of pocket as a result of their volunteering. Volunteers are therefore encouraged to make expense claims in line with this policy.

Expense claims should be submitted promptly on the Volunteer Expense Claim Form provided. In order to assist with the management of the charity’s budget, volunteers should claim for their expenses on at least a quarterly basis. Should Circles South East receive expense claims more than a month after the end of the financial quarter, these may not be paid. Should volunteers wish to make more regular claims, we support them to do so weekly or monthly as desired.

Circles South East will endeavour to pay claims by the end of the week following submission. Some delays may occur at holiday times or due to staff sickness. Claims can be paid quicker if bank account details (account number, branch number and name of account) are made available.

Funding variations may exist between projects, which Coordinators will inform volunteers about as relevant.

Counselling Service Expenses

As mentioned above, free supervision can be provided by Circles South East relating to Circles South East clients only. If counsellors prefer to access external supervision the Charity can contribute to the costs of that supervision to a maximum of £50 per month.

Any accommodation costs incurred by Circles South East Counselling will be met by the Charity, as will professional organisation membership and Insurance costs if necessary. Travel costs will be met as per guidelines above.

Standard Adult Circles Social Events/Other Spending

Circles projects may have access to a small allocated Socials Budget, subject to local funding arrangements. This budget can be used by any Circle within that area/project for specific social activities (not including refreshments as noted above) which are clearly linked to the needs of the Service User, aims of the Circle or goals identified within Circle review meetings. The budget can also be used to purchase items for the Service User if there is a clear need for them, a link with their health/wellbeing and concerns about their ability to pay for such items themselves or through some other accessible means (for example if pencils are needed to join an art group etc).

Any budget allocated for social/other spending will be small and is to be accessed by all Circles within the region to support the progress of all Service Users. Therefore volunteers must seek guidance from their Coordinator regarding current arrangements for social/other spending prior to spending money/making a claim, as this budget may not always be accessible.

Coordinators will be responsible for completing a brief application to access any allocated funds, which will require them to detail how the intended social/spending will help the Service User to achieve their goals or help with development in areas identified as important at the start of the Circle/during reviews. This application will go to the Senior Manager for the project/area who will consider an application in light of any previous applications by that Circle, the reasons for the proposed spending and how much money is left within the budget.

All spending from a Socials Budget must be pre-approved by a Senior Manager and Coordinator. Applications cannot be made after the event/spending and volunteers must be aware of this.

References Policy

Volunteers should not provide character references or personal references for Service Users. This particularly applies for situations in which Service Users are seeking employment where information regarding criminal convictions has not been asked for by potential employers. Any references for Service Users should be directed to a member of Circles South East staff.

Circles South East can provide references for volunteers seeking employment, but only after a volunteer has been trained and has been actively volunteering for at least six months. This allows us to comment on issues such as reliability and appropriate behaviour with confidence. Volunteers are encouraged to ask members of staff if they are willing to provide a reference before they pass on their contact details formally to a potential employer.

Volunteer Exit Policy

Circles South East understands that there are times when a volunteer may need to leave their volunteering position for personal reasons or due to a change of circumstances. Volunteers must inform their Coordinator of their intention in advance, giving as much notice as is practical. Guidance for stepping away from the service will be provided by the Coordinator and a structured exit strategy will be implemented.

Volunteer Exit Procedure

- The volunteer should notify their Coordinator in advance, giving as much notice as possible
- The Coordinator may invite the volunteer to attend a meeting or engage in a phone call to discuss any specific issues and devise an exit strategy
- The volunteer should inform the Service User and their volunteer colleagues (if relevant) of their decision to exit their volunteering position unless prevented from doing so by exceptional circumstances
- The volunteer is entitled to request a debrief meeting with the Coordinator once they have ended their involvement with the service.
- The volunteer is entitled to a referral to a counselling service if it is felt appropriate by the Coordinator or requested by the volunteer
- The Coordinator will give consideration to whether it is appropriate to replace the exiting volunteer with another available volunteer.
- Where possible and relevant, any points to be learnt from the reason for the volunteer's exit from the service should be recorded and shared with the Circles South East team.

Data Destruction

Whether a volunteer is stepping away from their volunteering position earlier than expected or when the service was due to end, they are expected to do the following:

- Delete all documents related to the Service User that are saved on their computer/devices
- Destroy or return any physical documents they have been given relating to the Service User
- Return any mobile phones they have been issued with, ensuring messages and phone numbers have been deleted
- Leave any MS Teams that have been set-up for the service being delivered
- Leave any Rocketchat groups that have been set up for the service being delivered
- Delete all emails that relate to the service/Service User (including sent items and those in the 'deleted items' folder)

Ongoing Contact with Service Users

As a service reaches its conclusion it would be beneficial for volunteers to consider how they wish to end their contact with the Service User, or whether they would like to remain in contact with them. It is important that volunteers do not feel pressurised into continuing contact with their Service User and this should only be done if a volunteer freely chooses to do so and feels that they can implement and manage any personal safeguards which may be necessary.

Where volunteers are working together as a group to support a Service User, it may be that there is a difference of opinion within the group, with some volunteers wishing to remain in contact whilst others may not wish to do so. It may also be the case that a Service User wants to move forward with their life in a way which does not involve any further contact with their volunteer(s). These decisions should be respected by all.

Decisions regarding continued contact between a volunteer and a Service User should be communicated to the Coordinator prior to the closure of the service. This will ensure that the relevant guidance can be provided and appropriate safeguards put in place. Should contact between a volunteer and a former Service User take place following the closure of the service, we request that any evidence or concerns of an increase in risk be communicated to Circles South East (tel: 01235 816050) at the earliest opportunity so that the appropriate action can be taken. In the event of a risk of serious harm to self or others being imminent, volunteers should contact the emergency services by dialling 999.

If a volunteer does keep in touch with a former-Service User, then they must disclose this ongoing relationship to any Coordinator asking them to be involved in a new service. The Coordinator will decide whether volunteering in a new service is appropriate. The Coordinator's decision is final and binding.

Data Protection & Information Sharing Policy

Circles South East is committed to meeting its obligations under the General Data Protection Regulations (GDPR), which came into force on 25th May 2018. GDPR regulates the way in which we collect, manage and use an individual's personal data.

Volunteers must be aware of, and comply with, the requirements of GDPR when they collect or handle personal data about a Service User or any of their fellow volunteers.

Personal data refers to 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. A wide range of personal identifiers constitute personal data including name, age, address, date of birth, identification number, or photographs/images of the individual.

In addition to this, volunteers may have access to 'special category data' consisting of information relating to an individual's

- Race
- Ethnic origin
- Politics
- Religion
- Trade union membership
- Health
- Sex life
- Sexual orientation

Equally, volunteers may have knowledge of a Service User's criminal convictions, offences, proceedings or allegations (if relevant). These fall under a separate category of 'criminal offence data'.

Personal data, special category data and criminal offence data should not be used or disclosed to anyone outside of the service in a manner that the individual the data relates to (the 'data subject') would not be expecting, unless one of these key requirements can be met:

- **Consent** – the Service User has given their explicit consent to the disclosure being made and fully understands what data will be shared and how it will be shared
- **Legitimate interests** – There is an identifiable legitimate interest for the individual, organisation or wider community for sharing the data (for example, if you have information suggesting either that a further offence has been committed or is about to be committed).

With the exception of needing to contact the police in an emergency, no personal data, special category data or criminal offence data should be disclosed by any volunteer without the prior permission of the Coordinator.

All personal data needs to be processed in a manner which ensures the security of the data, including protection against unauthorised or unlawful processing, accidental loss or destruction.

In practical terms this means:

- All documents relating to Service Users are marked 'Restricted'. This is to say that the document, whether paper or electronic, should only be opened and read by the intended recipient.
- Any briefing documents or other documents shared with volunteers will be anonymised by the Coordinator and should be stored securely by volunteers.
- Minutes of meetings should be written on the template provided by Circles South East and should contain no identifying information. The Service User should be referred to as 'SU' (or 'CM' if they are a Core Member in a Circle), or by their unique reference number.
- Minutes should never contain the location of the meeting venue or identifying information about anyone else.
- Once sent to/shared with the Coordinator, meeting minutes should either be stored on a password protected computer which is solely used by the volunteer, or deleted.
- No personal data regarding Service Users should be stored on an unencrypted USB or other electronic storage device, including mobile phones.
- The above applies specifically to volunteers using Microsoft Teams, where folders should be closed immediately after use and passwords should be stored safely so that no other members of the household/public is able to access MS Teams folders.
- Where the MS Teams app or Rocketchat is being used on a mobile device, volunteers must ensure that the device is password/PIN protected and that they do not give access to information stored on MS Teams to any other person.
- If a volunteer downloads any documents from MS Teams related to their Service User, they should delete this document immediately after use.
- Texts, voicemail messages or emails relating to Circles South East's work should be deleted from mobile phones immediately after being accessed.
- Any mobile phone provided by Circles South East should be PIN-protected
- Circles South East's work should never be discussed with anyone not directly involved in the work of the service unless in the most general, anonymised terms.

Any loss of personal data, special category data and/or criminal offence data, or any other breach of this policy must be reported to a member of Circles South East staff immediately. An investigation may follow in order to explore factors contributing to the leak, and appropriate actions being taken to avoid similar leaks from happening in the future.

Whether a service ends, or when a volunteer leaves their volunteering position, they are expected to do the following:

- Delete all documents related to the Service User that are saved on their computer/devices
- Destroy or return any physical documents they have been given relating to the Service User
- Return any mobile phones they have been issued with, ensuring messages and phone numbers have been deleted
- Leave any MS Teams that have been set-up for the service being delivered
- Leave any Rocketchat groups that have been set up for the service being delivered
- Delete all emails that relate to the service/Service User (including sent items and those in the 'deleted items' folder)

Confidentiality Policy

Given the sensitive nature of the work undertaken by Circles South East it is paramount that all persons working or volunteering within the organisation adhere to strict boundaries of confidentiality in order to protect themselves, their colleagues and our Service Users.

At the commencement of a Standard Adult or Youth Circle, a Circle Agreement will be signed by volunteers and the Core Member. Issues of confidentiality, and the exceptions to it, are covered in the agreement. Other projects run by Circles South East may have equivalent agreements in place which Coordinators will share with all relevant parties.

Volunteers must not share any information regarding the service, including the location of meetings; personal information about their Service User, or details of fellow volunteers with any third party without first gaining the permission of their Coordinator.

Third parties will not be introduced to Service Users or invited to attend meetings with them without first gaining the permission of the Coordinator.

Any notes or minutes from meetings are confidential documents and must not be shared with anyone outside of the service.

Volunteers must take responsibility for storing any information regarding their Service User securely and must take steps to ensure that this information is not accessible to any third party (see Data Protection and Information Sharing Policy for more information).

All counselling volunteers are advised to register with the Information Commissioner's Office (<https://ico.org.uk/>).

Volunteers should not breach organisational or individual confidentiality through the use of social media such as Facebook or Twitter (see Social Media Policy for further details).

Any breach of confidentiality may compromise the safety of Service Users and/or other volunteers, and as such, will be treated extremely seriously. Any perceived breach of confidentiality will be investigated and may result in disciplinary action.

Communication and Information Sharing Policy

Circles South East is not formally a 'Duty to Cooperate' agency however it is recognised as a 'significant other' working in close partnership with statutory agencies. Circles South East has protocols in place that acknowledge a duty to cooperate with statutory agencies on the following areas:

- Serious Sexual Offence Review
- Serious Case Review
- Multi Agency Public Protection Arrangements (MAPPA)
- Child/Adult Protection Committees
- Multi Agency Risk Assessment Conferences (MARAC)

Volunteers should be aware that they will be required to comply with these arrangements as requested by the Coordinator. This could involve:

- Providing the Coordinator with all relevant information relating to their Service User in order to contribute fully to the information sharing process.
- Attending identified meetings with the Coordinator to share information on a Service User when deemed appropriate.
- Meeting with or being interviewed by a Police Officer.
- Meeting with the Service User's Probation Officer, Social Worker or other professional (as relevant).
- Attending a meeting with the Service User in a supportive role (for example, acting as an appropriate adult if the Service User has a learning disability)

Communication and information sharing is essential for the effectiveness of service delivery and safety of everyone involved with the charity. The following is in place to ensure that Circles South East provides professionals with the relevant information they require. Equally we expect a two-way information sharing process and professionals from statutory and other partnership agencies should inform the Coordinator of any change in circumstance of the Service User and of any information relevant to the progress and safety of the service.

The Coordinator is responsible for:

- Sharing risk-related information with volunteers/professionals where appropriate
- Attending MAPPA meetings (as relevant) and providing regular progress summaries to professionals
- Providing professional summaries to all relevant professionals taken from the meeting notes/minutes and contact with volunteers when required
- Providing relevant professionals with an End of Service Report following the closure of a service (as relevant)

Roles and Responsibilities in Reporting Risk

The following details procedures for volunteers if they suspect or have evidence that a Service User is at risk of committing an offence, or is presenting as a risk of harm to themselves or others.

Volunteers must alert their Coordinator immediately of their concerns about behaviour they have witnessed or otherwise been made aware of. If the Coordinator is unavailable then the volunteer should contact the Circles South East office and request to speak to another Coordinator or to a member of the senior management team (Tel: 01235 816050). If concerns are raised outside of working hours, volunteers can contact the Out of Hours telephone line. The line operates Monday to Friday 5.00pm until 9.00pm. The Out of Hours telephone number is 0300 303 0781.

In the event that volunteers are unable to contact anyone noted above and there is an imminent risk of harm (to self or others) a volunteer should contact the emergency services.

Areas of concern requiring immediate attention:

- The Service User is identified as posing an imminent risk of harm to a specific individual or to the general public
- The Service User is engaged in high risk behaviour identified by the Coordinator as a significant warning sign
- The Service User is discovered engaging in illegal behaviour
- The Service User is considered to pose an imminent risk of harm to themselves
- The Service User is displaying violent and/or aggressive behaviour
- The Service User is found to have breached the terms of their Licence, Community Order, Sexual Offences Prevention Order (SOPO), Sexual Harm Prevention Order (SHPO) or Sexual Offender Registration requirements (as relevant)

See Risk Assessment and Escalation Policy for more information about what may constitute 'warning signs' for volunteers to be aware of.

Circles South East volunteers have a duty to:

- Communicate information immediately following the procedure outlined above
- Cooperate fully with all inquiries under the guidance of the Coordinator
- Provide a written statement for the Police if requested

Circles South East Coordinators have a duty to:

- Ensure volunteers are aware of the policies and procedures and have adequate training to respond appropriately to a serious incident
- Notify agencies if abuse is identified or suspected
- Support volunteers and Service Users, ensuring the safety of all individuals
- Ensure that agencies have the full information in relation to identified risk and vulnerability
- Listen and take the information reported seriously

Risk Assessment and Escalation Policy

Policy objectives

The safety of volunteers is of paramount importance, and Circles South East has a responsibility to ensure that all appropriate steps have been taken to identify, review, manage and monitor any potential risks prior to, and throughout the duration of a service.

1. Risk Assessment Procedures

Circles South East will undertake a full operational risk assessment of the following prior to the commencement of contact between Service Users and volunteers:

The Service User's level of risk will be assessed with regard to their:

- Risk to self
- Risk to volunteers
- Risk to the general public

1.1 When assessing the personal safety of volunteers, particular attention will be paid to assessing potential risks associated with the following:

- The appropriateness of any meeting venues
- Whether individual contact is permissible
- Any potential difficulties associated with mobile phone contact
- The allocation of Service Users to specific volunteer(s) (for example, do any of the volunteers selected live in close proximity to the Service User)
- Any specific restrictions surrounding the disclosure of personal information
- The specific needs and requirements of individual volunteers

This information will be completed by the Coordinator and recorded on file. The assessments will be reviewed and revised appropriately if any original circumstances change (e.g. if the service moves to a new venue) and volunteers will be briefed about all changes to risk.

2. Reporting risk process

2.1 Introduction

This risk identification, escalation and reporting procedure serves to ensure that all staff and volunteers working with a Service User are aware of any generic risk factors which could be relevant, as well as individual risk factors and when and how to escalate any identification of risk.

2.2 Risk identification process

Each individual Service User participating in a Service will have their own individualised risk identification traffic light document (see template over the page). This document details risky behaviours and grades them detailing the action to be undertaken and the timescales within which the action should be taken.

The traffic light document for each Service User will be unique. Each traffic light document includes generic risky behaviours (as relevant) as well as individualised risky behaviour specific to the individual.

3. Escalation and reporting procedure

Staff and volunteers should report any behaviour that they feel is risky or inappropriate even if it is not agreed by volunteer colleagues (as relevant) .

- All green and blue concerns should be noted in the meeting minutes and sent to the Coordinator within **48 hours** of the meeting.
- All amber concerns should be noted in the meeting minutes and sent to the coordinator within **24 hours** of the meeting.
- All red concerns should be reported **immediately**. The risk escalation flow chart over the page details the procedure to follow for reporting red concerns.

3.1 Escalating Concerns Process

Stage 1: Professional to professional – Any volunteer who feels that a behaviour is not safe or is inappropriate should consult with their Coordinator following the below traffic light behavioural indicator procedure. This should help to clarify their thinking in order to identify the concerns; to be specific as to what has occurred or is occurring or if there are imminent risky behaviours. The Coordinator will provide a risk management strategy with key indicators/guidance and possible outcomes for the volunteer(s) to follow.

Stage 2: Manager to Manager – If the risk is not resolved at Stage 1 or the risk is imminent; the concerned Coordinator should contact their supervisor/manager within Circles South East who will raise concerns with the equivalent supervisor/ Senior manager in the relevant partnership agencies involved with the service.

Stage 3: Senior manager to Senior manager – If the problem is not resolved at Stage 2 the supervisor/Senior manager reports to their respective operations manager or named/designated professional lead. These two managers must discuss and provide a robust risk management plan for all parties involved in the service. Wellbeing and safeguarding concerns are the main consideration in dealing with risk.

Generic Risky Behaviour			
Green	Blue	Amber	Red
(to include generic risk factors for volunteers to be aware of)	(to include generic risk factors for volunteers to be aware of)	(to include generic risk factors for volunteers to be aware of)	(to include generic risk factors for volunteers to be aware of)
Risky Behaviour which is specific to the Service User			
Green	Blue	Amber	Red
(to include specific and individualised risk factors for volunteers to be aware of)	(to include specific and individualised risk factors for volunteers to be aware of)	(to include specific and individualised risk factors for volunteers to be aware of)	(to include specific and individualised risk factors for volunteers to be aware of)
Action Required			
Green	Blue	Amber	Red
None Highlight queries in minutes. These will be answered by the Coordinator	Immediate challenge by volunteer(s) Warning by volunteer(s) that the behaviour is inappropriate Discuss as live learning in the meeting	Immediate challenge by volunteer(s) Warning by volunteer(s) that the behaviour is inappropriate Discuss as live learning in the meeting Explore tactics to help manage the situation	Immediate challenge by volunteer(s) Warning by volunteer(s) that the behaviour is inappropriate For serious concerns the meeting should be ended and the incident reported immediately For less serious concerns the session should be finished and then the concern reported immediately
Timescales			
Note in minutes and send to Coordinator within 48 hours	Note in minutes and send to Coordinator within 48 hours	Note in minutes and send to Coordinator within 24 hours	Immediate telephone call – see risk escalation flowchart

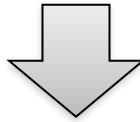
Please note: All routine questions should be directed to the Coordinator. The Coordinator will endeavour to answer the query within 48 hours. Please **do not contact the professionals involved with the case** or any other agency directly unless instructed to do so by the Coordinator.

Risk Escalation Flowchart

For **Red** concerns...

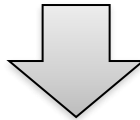
EMERGENCY CONTACT ONE

If during working hours – Coordinator:
If outside of working hours - Out of Hours line: 03003030781
If no response...



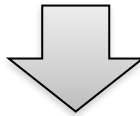
EMERGENCY CONTACT TWO

Office: 01235 816050
If no response...



EMERGENCY CONTACT THREE

Senior Manager(s) –
If no response...



In the unlikely event that you are unable to reach any of the above emergency contacts, please call the Police on: 101. If it has been necessary to call the police, please let one of the emergency team above know you have done so as soon as possible, and document your actions and inform the Coordinator ASAP.

Health and Safety Policy

It is important that clear and consistent boundaries are adhered to when working with Service Users. Volunteers must always refer to the appropriate guidelines and ensure that they are not setting precedence outside of the agreed boundaries of the service. Volunteers must never do anything that they are uncomfortable with and that has not been agreed by the Coordinator. If at any stage a volunteer is unsure of the correct procedure to follow they should consult the Coordinator.

A full copy of Circles South East's Health and Safety Policy can be obtained by request from your Coordinator. However it is essential that all volunteers read, understand and comply with the following policy information specific to working with Service Users and other volunteers:

- All volunteers will receive initial and refresher training to enable them to perform their role to the required standard. Supplementary training will be provided on subjects relevant to the volunteering role.
- No service will commence unless the safety of volunteers has been assessed and appropriate risk management strategies implemented.
- Regular supervision is provided to volunteers who are active in a service and health and safety issues should be a feature of every supervision session.
- Volunteers have a duty to report any health and safety concerns to their Coordinator at the earliest opportunity.
- All venues for formal meetings are to be risk assessed by the Coordinator.
- Personal alarms will be provided by Circles South East if:
 - requested by a volunteer
 - if it is assessed as necessary for volunteers to be equipped by the Coordinator
- Individual contact with the Service Users can only be undertaken once it has been risk assessed and approved by the Coordinator (see Individual Contact Policy). No money or gifts should be exchanged between a Service User and a volunteer without the prior authorisation of the Coordinator.
- Volunteers should not disclose personal information such as their home address or telephone number to any Service User.
- Circles South East will provide a mobile telephone to each service. This phone will provide a means for volunteers to communicate with their Service User between meetings where necessary (see Mobile Phone Policy for more information).
- Volunteers may have access to Rocketchat for communication with their Service User. This is overseen and monitored by their Coordinator but if any concerns arise from its use volunteers should alert their Coordinator immediately.

Communicating Concerns

If a volunteer has any concerns about the behaviour of others which might impact on the safety of the service, or has any concerns relating to the venue which might also impact

on health and safety, these should be communicated to the Coordinator at the earliest opportunity.

Accident Reporting

All incidents and cases of work-related ill health for volunteers are to be recorded in the accident book which is held in Circles South East's administration office. Any such incidents which relate to work carried out on behalf of Circles South East should be reported to the Coordinator as soon as possible.

Insurance

All volunteers are covered under Circles South East's insurance policy. Further information can be provided upon request.

Vehicle Insurance

Volunteers are asked to ensure that their car insurance covers any journeys they make to undertake their work and training with Circles South East.

Individual Contact Policy

****Note for Counselling Volunteers only - this Policy only applies to Counselling Volunteers who are working with ex-offenders/those who have caused sexual harm rather than other Circles South East Counselling clients. If you are unsure please speak to your Coordinator****

No one-to-one contact between a volunteer and a Service User will take place unless this has been risk assessed and approved by the Coordinator. Once a risk assessment has been completed the Coordinator will share the contents of this with the relevant volunteer, and if approved, a risk management plan will be agreed. Volunteers will not be required to have one-to-one contact with their Service User unless they are comfortable doing so.

Individual contact is not to take place at the Service User's accommodation unless there are exceptional circumstances. If it is felt that there is a valid reason for individual contact taking place at a Service User's home address this must be risk assessed and approved by the Coordinator prior to any home visits taking place. Concerns that arise during individual contact should be reported at the earliest opportunity to the Coordinator. If the Coordinator is not available, information must be forwarded to the Circles South East office (Tel: 01235 816050) or the Out of Hours service if the matter is urgent (Tel: 0300 303 0781). In the event of an emergency, volunteers should contact the emergency services.

Individual Contact in Circles

Any information disclosed by the Core Member during individual meetings should be shared with the other members of the Circle as soon as possible. The Core Member should be made aware that anything disclosed during individual meetings will be shared with the whole Circle.

Counselling

Circles South East Counselling moved to using online formats during recent years. We have left decisions regarding online counselling at the discretion of individual counsellors. In terms of training and practice updates for those delivering counselling using online formats, individual professional organisations (eg BACP/UKCP) have issued various guidelines. It is individual counsellors' responsibility to adhere to the terms and conditions of their professional organisations.

Mobile Phone Policy

As part of Circles South East's health and safety policy each service may be provided with a mobile telephone to ensure that volunteers have the means to contact their Service User, volunteer colleagues (as relevant), and the Coordinator.. Volunteers are permitted to use their personal mobile phones for contacting other volunteers or for contact with their Coordinator.

- Volunteers must not use their personal mobile for any contact with the Service User unless there are exceptional circumstances.
- Any contact between a Service User and a volunteer using the volunteer's personal mobile phone must be approved in advance by the Coordinator and the reasons recorded on file.
- Under no circumstances should home landline telephone numbers be exchanged between volunteers and Service Users.
- Mobile phones provided by Circles South East are not to be used for private conversations or for business that does not directly relate to a volunteer's role. If in doubt, volunteers should seek further guidance from their Coordinator.
- If volunteers are using their personal mobile device to access the Microsoft Teams app or Rocketchat they should ensure that their mobile phone is password/PIN protected and that no other individuals are given access to documents within the MS Teams app.
- If volunteers download documents from the MS Teams app onto their mobile phone they should delete these immediately after use.

Volunteers must set clear boundaries with the Service User over the use of the mobile phone. If volunteers are unclear over the type of boundaries that should be imposed, clarity and guidance can be sought from the Coordinator. If the Service User does not adhere to the boundaries set by volunteers the Coordinator must be informed.

Circles South East will top up mobile phone credit at a maximum rate of £20 per month. Requests for top up should be directed to the Coordinator. In exceptional circumstances this amount may be increased on the approval of the Coordinator, for a limited period only. Volunteers may top phones up themselves within this limit, but must seek permission from the Coordinator.

Usage of mobile phones will be monitored. Reasons for exceptional levels of use should be discussed with the Coordinator.

Lost or damaged mobile phones will be replaced by Circles South East once. Any further loss or damage will be charged.

Mobile phones remain the property of Circles South East and volunteers will be asked to return them once the service comes to an end.

In line with Circles South East's Data Protection and Information Sharing Policy, texts, voicemail messages or e-mails relating to Circles South East's work should be deleted from mobile phones immediately after being accessed. All mobile phones which are used to communicate with Service Users, other volunteers or members of staff, should be PIN-protected and used solely by volunteers.

Media Policy

Good media coverage can help to educate the public, reassure them that constructive and collaborative work is being done, and recruit volunteers for the charity. Members of staff are trained to engage with both local and national media, and will do this in consultation with Circles UK complying with the National Media Protocol (a full copy of this can be provided).

No volunteer should make any direct approach to the media. If approached, volunteers must refer all enquiries to Circles South East's office immediately (Tel: 01235 816050), and should not give out any information.

There may be occasions where engagement with local and/or national media is approved by Circles UK and Circles South East. In such circumstances Circles South East will ensure that any direct involvement of a volunteer and/or the Service User with the media will follow the correct procedures:

- The relevant partnership agency's media officer will be informed of the media interest and discuss and agree any involvement with the relevant professionals.
- No involvement of a Service User will take place without the approval of statutory partners, including the media officer, probation officer and senior management team as relevant. This will ensure that a consistent message is communicated.
- Circles South East agrees to make a joint assessment with partnership agencies over whether it would be appropriate to involve a Service User with the media.
- If a volunteer has agreed to provide an interview at the request of Circles South East an assessment over any impact this may have on the Service User and volunteers will be taken into consideration.
- Volunteers will be trained prior to any engagement with the media and will be briefed thoroughly prior to giving an interview.
- No volunteer or Service User will ever have their confidentiality breached and agreements with the media are made to ensure that their identity is protected.
- If volunteers wish to waive their right to anonymity they must have agreement from Circles South East prior to any engagement with the media.
- Partner agencies agree to inform Circles South East of any media interest in the Service Users the project is working with and any opportunities for positive media coverage of the charity's services.

Circles South East will ensure that a contract is in place with all media contacts ensuring the following safeguards are followed:

- No real names or identifying factors about volunteers or Service Users will be used.
- No journalist is allowed to attend a formal meeting to observe, record, or film service activity without prior permission from Circles South East's Chief Executive.

- No journalists are allowed to attend a meeting venue without prior permission from Circles South East's Chief Executive.
- All contact with the media is to take place at an identified safe venue agreed by the Coordinator and the Chief Executive.
- The work of Circles South East will always take priority over engagement with the media

Social Media Policy (Volunteers)

Introduction

Circles South East embraces the use of social media as a communication tool, and recognises the significant benefits to the organisation through proper usage. This could include promotion of our services, volunteer recruitment, education, fundraising and as a method of forming links with potential commissioners. Volunteers are actively encouraged to play a role in the positive promotion of Circles South East via social media channels, but must remain aware that as a representative of the charity there are specific rules and guidelines which must be adhered to in order to enhance the charity's prospects and not cause damage to its reputation. This policy explains how volunteers can make best use of social media in a way which is safe and effective.

This social media policy describes the rules governing volunteers' interaction with Circle South East's social media accounts and to provide guidance for volunteers regarding what they can say about the charity via their own personal social media accounts. There is a separate social media policy for paid staff, board members and contractors linked to Circles South East. The social media policy is not a stand-alone document and should be read in conjunction with Circle South East's other policies and procedures, particularly those relating to data protection, confidentiality, equality, diversity and inclusion.

This policy applies to all forms of social media, including but not limited to, Facebook, YouTube, Twitter and Instagram, along with other internet postings including personal blogs. It applies to the use of social media both for volunteering and personal purposes, whether while volunteering or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or personal equipment belonging to volunteers.

Responsibilities

It is important to remember that we are all ambassadors for the charity and that social media is never private. We all therefore have a responsibility for implementing this policy and ensuring that the correct guidelines are followed. It is important that you take the time to read and fully understand it. If you have any questions regarding the content of this policy then please raise them with your Coordinator. Coordinators have a specific responsibility for operating within the boundaries of this policy, ensuring that all volunteers understand the standards of behaviour expected of them, taking action when behaviour falls below this.

Should you have any concerns or questions about any social media content relating to Circles South East then these must be brought to the attention of the relevant person(s) at the earliest opportunity. For volunteers the relevant person will be your Coordinator. If for any reason you are unable to make contact with your Coordinator then you should contact the main office (Tel: 01235 816050) and ask to speak to a Coordinator or a member of the Senior Management Team.

General Social Media Guidelines

Circles South East recognises that social media offers a platform for the charity to perform marketing, stay connected with volunteers and build its profile online. The charity also understands that its volunteers may wish to participate in relevant conversations on social networks. Social media is an excellent way for people to make connections, shape discussions and share ideas. The charity therefore encourages volunteers to use social media to support the charity's goals and objectives.

This policy aims to protect individuals volunteering with us in any role and to encourage volunteers to take responsibility for what they write, and to exercise good judgment and common sense. The purpose of this policy is to set out what Circles South East expects from our volunteers when using social media.

This policy aims to:

- Provide clear guidelines on what volunteers can say about the charity
- Comply with relevant legislation and help volunteers to avoid any potential breaches
- Assist Coordinators to manage performance effectively
- Help volunteers to create a boundary between their private lives and their volunteering
- Protect Circles South East against liability for the actions of volunteers
- Provide clear rules about sensitive issues including confidentiality and data protection and explain how problems with inappropriate use will be addressed

Regardless of which social networks volunteers are using, following some of these simple rules can help to avoid the most common pitfalls.

- **Be thoughtful and polite.**
Any behaviour online which may be seen as rude, abusive, aggressive or discriminatory will not be tolerated. Discussions on social media can take place in a very public arena. Volunteers should engage in all communications in a respectful manner in order to preserve the reputation of the charity.
- **If unsure, don't post.**
Volunteers should err on the side of caution when posting to social networks. If a volunteer feels that an update or comment might cause offence, result in complaints, or be otherwise inappropriate then they should refrain from posting. If there is any uncertainty then your Coordinator should be consulted first.
- **Look out for security threats.**
All volunteers should be aware of social engineering and phishing attempts. Social media is also used to distribute spam and malware. If you have any concerns regarding content relating to Circles South East's social media accounts then please bring this to the attention of your Coordinator.
- **Don't escalate things.**
It is very easy to post a quick response to a contentious status update or engage with internet trolls and then regret it. Volunteers should take the time to pause

before responding. Sometimes the best response is no response at all. If in any doubt you should consult your Coordinator.

- **Respect confidentiality.**
Our duty to comply with data protection requirements and protect the identity of our funders, partners, colleagues, volunteers and Service Users is of paramount importance. Please refer to the section on confidentiality and data protection below for further guidance.
- **Avoid negativity.**
We need you to help protect our professional reputation. Volunteers must not post disparaging or defamatory statements about Circles South East; our staff, volunteers or Service Users; partnership agencies, funders or commissioners. Volunteers should also avoid social communications that might be misconstrued in a way that could damage our business reputation, even indirectly.
- **Remain mindful.**
Volunteers are personally responsible for what they communicate in social media. Remember that what you publish might be available to be read by the masses, including Circles South East staff and other volunteers, your current/future employers and social acquaintances for a long time. Keep this in mind before you post content.
- **Don't feel pressured.**
There is no obligation for volunteers to link their personal social media accounts to any of Circle South East's social media accounts. Similarly do not feel pressured into linking with the personal accounts of other volunteers. If you wish to maintain a clear separation between your personal life and your role as a volunteer then that will be respected.
- **Take ownership of your opinions.**
If you choose to identify yourself as a volunteer of Circles South East on social media, you must also state that your views do not necessarily represent those of the organisation you are volunteering with. For example, you could state, "the views in this posting do not represent the views of Circles South East."
- **Safeguard yourself.**
You are responsible for the security settings of any social media sites you use and should ensure they are set to the appropriate level if you wish to limit who can see your personal information.

Use of Circles South East's social media accounts

Authorised Users

Only staff members who have been authorised to use the charity's social networking accounts may do so. Authorisation is usually provided by the relevant senior manager and is granted when there is an identified purpose which is linked to the staff member's role. Staff members should be briefed on the agreed social media strategy prior to publishing anything on social media.

Creating New Social Media Accounts

New social media accounts in the charity's name must not be created unless approved by the relevant senior manager. The charity operates its social media presence in line with an agreed strategy that focuses on the most appropriate social networks, taking into account available resources. Volunteers are not permitted to set up any social media accounts in Circles South East's name.

Inappropriate Content

The charity's social media accounts must not be used to share or spread inappropriate content, or to take part in any activities that could bring the organisation into disrepute. When sharing any content from an external source, volunteers should always review the content thoroughly first and should not post a link based solely on a headline.

Inappropriate content includes:

- Material which might be defamatory or incur liability for the charity
- Pornography, information encouraging criminality, terrorism or the use of illicit substances
- Discrimination upon any grounds (see relevant policy)
- Anything which may be deemed offensive or harassing in nature
- Any material which could damage the image or reputation of Circles South East
- Any material which identifies staff, volunteers, partners or funders without their written approval
- Any material which could lead to the identification of Circles South East's Service Users
- Any links to spam, junk or chain messages

Copyright

Circles South East respects and operates within copyright laws. Volunteers should not use the charity's social media to publish or share any copyrighted software, media or materials owned by third parties unless permission has been given by that third party.

Volunteers are able to share content published on another website as long as the website is not copyrighted and has obvious sharing buttons or functions to allow this.

Confidentiality and Data Protection

Volunteers engaging with Circles South East's social media platforms or discussing any aspect of their volunteering role with us should ensure that they have a good working knowledge of Circles South East's confidentiality and data protection policies. In order to ensure that confidentiality is maintained at all times, volunteers should not:

- Share or link to any content or information owned by the charity that could be considered confidential or commercially sensitive. This might include personal details of other volunteers or Service Users, financial documents or details of future strategies or campaigns.
- Share or link to any content or information owned by another organisation or person that could be considered confidential or commercially sensitive.

- Share or link to data in any way that could breach the charity's data protection policy.
- Allow any unauthorised person(s) to gain access to the charity's social media accounts.
- Reveal sensitive information to a third party through social media channels.

There may be occasions when Circles South East deems it desirable/appropriate to post information or news which could potentially identify volunteers, staff members or funders. No such material will be published on social media which identifies specific individuals without first obtaining the written permission of those concerned. Any individual who is likely to be identified should be provided with information regarding when and where the information will be posted and who the likely audience will be (for example, whether it will be posted in a private group or on a public page). Individuals are able to withdraw their consent at any time and may request to have any images or information about themselves removed from Circles South East's social media pages. Consent can be withdrawn by emailing info@circlessoutheast.org.uk

There are no circumstances under which it would be appropriate to identify any of our Service Users.

Breach of Social Media Policy

Any potential breach of the social media policy should be reported at the earliest opportunity to your Coordinator who will then be responsible for notifying the relevant senior manager. Volunteers who have knowingly breached the policy may be subject to disciplinary proceedings in line with the relevant grievance & disciplinary policies. Volunteers will be required to remove any social media content which is deemed to constitute a breach of this policy.

Grievance and Disciplinary Policy

Generally

This policy should be read in conjunction with the **Circles South East Code of Conduct**, which defines what the Charity considers to be acceptable behaviour. Circles South East has committed to creating and maintaining a safe and supportive working environment, which includes an assurance that the Charity encourages Service Users, volunteers and staff to act on any transgression of the Code of Conduct. Extra support offered throughout any grievance or disciplinary process can include counselling and/or additional training.

Service Users, volunteers or staff concerned about issues or behaviour that do not relate directly to themselves (i.e. witnessing offensive or harmful behaviour concerning Circles South East) should refer to the **Whistleblowing Policy** for guidance.

Bullying and Harassment

All Volunteers and Staff have the right to be treated with respect. Bullying or harassment of any kind, including racial or sexual harassment will not be tolerated. Circles South East has a responsibility to create and maintain a positive and safe working environment by supporting this policy and following the appropriate procedures when required.

If employees or volunteers are harassed by visitors to the building or any premises where they are engaged in the work of the organisation, they should report this to their allocated Coordinator or to Circles South East's senior management team who will take immediate action to address the issue and reinforce that such behaviour is unacceptable.

If bullying or harassment is experienced, the individual concerned may wish to attempt to address the problem through an informal approach, making it clear that the offending language or behaviour is unacceptable. This can be done with the guidance of the Coordinator or another member of staff if support is required.

A more formal approach is available if the offensive language or behaviour persists or when the individual feels that a formal approach is more appropriate for the circumstances. Formal complaints should be made following the procedures outlined below.

Grievance Procedure

If a volunteer has a grievance which concerns a volunteer or member of staff, they should first discuss this matter with the individual concerned to try and sort out the problem informally.

If this is not possible or appropriate, then the individual should meet and discuss the issues with a relevant member of Circles South East staff. This may be the Coordinator or the Senior Manager. Should the grievance concern the Coordinator then the matter should be referred to the senior management team. Contact details for Senior Managers can be obtained by emailing info@circlessoutheast.org.uk or calling 01235 816050. A

named member of the senior management team will then be given responsibility for investigating the grievance.

The individual responsible for investigating the complaint will have twenty-eight working days to investigate and resolve the matter. This will allow time for both parties to be fully consulted along with any potential witnesses.

If at the end of the investigation both parties agree with the proposals and recommended route of action then this will be the end of the matter. If there is no agreement between both parties or if the person allocated to resolve the matter is unable to do this successfully, the complaint will be referred to Circles South East's Chief Executive (or another member of the senior management team in the absence of the Chief Executive), who will have a further ten working days to investigate the complaint. The decision of this person is final.

Possible outcomes for a Volunteer as a result of a substantiated grievance:

- Informal (verbal) warning (to be recorded on the volunteer's file for a period of six months. Details will be removed from the volunteer's file after this time if the Coordinator is satisfied that the problem has been satisfactorily addressed)
- Formal written warning
- Final written warning
- De-selection as a Volunteer

Where a volunteer is issued with an informal or formal warning, consideration will be given by the Coordinator for the need for that individual to repeat the initial volunteer training. If a volunteer refuses to attend the training when requested they will be unable to continue with their volunteering role.

Disciplinary Procedure

The Circles South East Code of Conduct offers guidance as to the behaviour the Charity expects from staff and volunteers. However, possible transgressions that may result in disciplinary action can include:

- Bullying or harassment
- Use of abusive or offensive language or behaviour
- Consistently poor attendance meetings
- Failure to disclose information relevant to his/her volunteering with the organisation
- Convictions for criminal offences which undermine a person's suitability for volunteering
- Disclosure of any confidential information relating to the organisation, Service Users or volunteers to anyone outside of the service
- Deliberate falsification of expense claims
- Displaying an inability to maintain personal boundaries
- Deliberately ignoring the specific instructions of the Coordinator

- Not adhering to volunteer policies and procedures
- Breaching a service agreement
- Breaching the requirements of the General Data Protection Requirements (GDPR)
- Demonstrating an inability to maintain a respectful relationship with the Service User and/or other volunteers
- Any situation where Circles South East has been brought into disrepute by a volunteer's behaviour, or where they have used their status as a volunteer to gain trust, access and/or credibility.

This list is by no means exhaustive.

If a Coordinator has concerns or has received a complaint or information that calls into question a volunteer's ability to be involved in the work of Circles South East they will invite the volunteer to attend a personal review. The Coordinator will discuss any concerns with the volunteer and provide the volunteer with the opportunity to respond and address the issues that have arisen. A volunteer is entitled to bring a support person of their choice to any meeting involving grievance or disciplinary issues.

The Coordinator has twenty-eight working days to investigate any allegations and make a decision regarding the individual's ability to continue volunteering with Circles South East. This decision will be made in consultation with the senior management team and/or Chief Executive. The volunteer may be suspended from their role during the investigation period and will be informed of the final outcome in writing.

The outcome of a disciplinary investigation will be one of the following:

- No further action
- Support via supervision and/or additional training
- Informal (verbal) warning (to be recorded on the volunteer's file for a period of six months. Details will be removed from the volunteer's file after this time if the Coordinator is satisfied that the problem has been satisfactorily addressed)
- Formal written warning
- Final written warning
- De-selection as a volunteer

Where a volunteer is issued with an informal or formal warning, consideration will be given by the Coordinator for the need for that individual to repeat the initial volunteer training. If a volunteer refuses to attend the training when requested they will be unable to continue with their volunteering role.

A volunteer will be de-selected if Circles South East concludes that the situation cannot be resolved satisfactorily, or if the situation is so serious that it warrants immediate de-selection.

In addition to the items listed above, a volunteer may also be removed from a service and deselected from volunteering for their own benefit/welfare. Reasons for doing so may include:

- Where it is evident to the Coordinator that a volunteer is using the service to meet their own personal needs or agenda
- Where it is evident to the Coordinator that a volunteer has unresolved issues or has an inappropriate motivation for engaging in the work

In all cases the volunteer has a right to appeal disciplinary decisions. Any appeal must be lodged within 6 months of the decision being made. This can be done in writing to the Board of Trustees (details on how to contact the Board can be provided by your Coordinator). Upon receipt of an appeal a Member of the Board will be allocated to consider the appeal and will have twenty-eight working days to communicate their decision.

Circles South East's responses to Grievance and Disciplinary procedures are overseen by Becky Saunders, Chief Executive, with ultimate responsibility lying with Nora Holford, Chair of Trustees.

Whistleblowing Policy and Guidance

This policy applies to staff and volunteers alike, and should be read in conjunction with Circles South East Safeguarding policy and Disciplinary and Grievance procedures. Our Whistleblowing process flow chart can also be consulted. The whistleblowing process is outlined to Service Users through Circles South East privacy notices, issued to potential Service Users at the point of referral. This said, whistleblowing, or public interest disclosure, is a distinct process in its own right. This policy is underscored by the Public Interest Disclosure Act 1998. Whistleblowing can occur when a worker (paid or unpaid) reports a concern about the improper actions or omissions of their colleagues or employer which may cause harm to others or to the organisation as a whole. The policy is intended to deal with serious or sensitive concerns about wrongdoings and/or malpractice such as the following:

- Criminal offences
- Failures to comply with legal obligations
- Failures in the protection of children or vulnerable adults
- Miscarriages of justice
- Health and Safety concerns
- Theft and/or misuse of charity's finance
- Behaviour likely to cause reputational damage to the organisation
- Individual or organisational concealment/cover up of the above

The essential difference between whistleblowing and personal/professional grievance is that the whistle-blower is reporting the abuse of others, rather than themselves. In other words the whistle-blower should consider themselves as a witness to the incident(s) rather than a complainant.

While the protection of whistleblowers and whistleblowing is enshrined in the Public Interest Disclosure Act 1998, it is recognised that potential whistle-blowers may have concerns about bearing witness to malpractice. However Circles South East encourages trust and openness in general, and so encourages whistle-blowing, even in difficult circumstances.

To this end Circles South East will:

1. Provide the organisational structure to encourage whistleblowing. This includes specific email address (whistleblow@circlessoutheast.org.uk), designated whistleblowing officer (Daisy Collinge), and registration with The Charity Commission, who operate a whistleblowing point of contact for cases of serious malfeasance.
2. Take the issue(s) raised seriously

3. Where possible and applicable ensure the anonymity of the whistle-blower. **NB if the issue involves illegality and/or threat or risk of harm to another person(s) Circles South East have a duty to inform Police and/or other statutory agencies. This may compromise anonymity should witness statements be required. It is therefore important to seek advice if the whistle-blower has any doubts in this regard. Free advice can be obtained via “Protect” on 0203 117 2520**
4. If the resolution of any issue relies on the identification of the whistle-blower, this will be done in negotiation, and we will take any attempted reprisals against potential whistle-blowers very seriously indeed.
5. Investigate and attempt to resolve any issue to the best of their ability, and in a timely fashion (see below)

Circles South East’s Whistleblowing Officer is:

Daisy Collinge – 07387 140718

Daisy.Collinge@circlessoutheast.org.uk

Concerns can also be logged on; Whistleblow@circlessoutheast.org.uk which is currently accessed by Daisy Collinge and Dom Williams, Senior Manager. Chair of Trustees, Nora Holford, has overall responsibility for addressing Whistleblowing concerns.

Should the whistle-blower wish to report anonymously, they can contact The Charity Commission at charitycommission.gov.uk and click on “Reporting a Serious Incident at your Charity” page then follow instructions.

Reporting Concerns:

For a quick view of the process please refer to the accompanying flow chart.

In summary, concerns should be reported as soon as possible. Reporting options available are:

- To your line manager or any member of Circles South East staff. Any staff member is approachable and trained to receive this information.
- To the Whistleblowing Officer
- To the independent organisation the Charity Commission.

Prior to reporting a whistle-blower may wish to seek advice. Free and independent advice can be obtained from a Helpline operated by an organisation called Protect who can be contacted on **0203 117 2520**. The type of questions they are likely to ask are:

What have you witnessed?

What is the risk involved?
Why do you want to blow the whistle now?
Who do you want to tell?

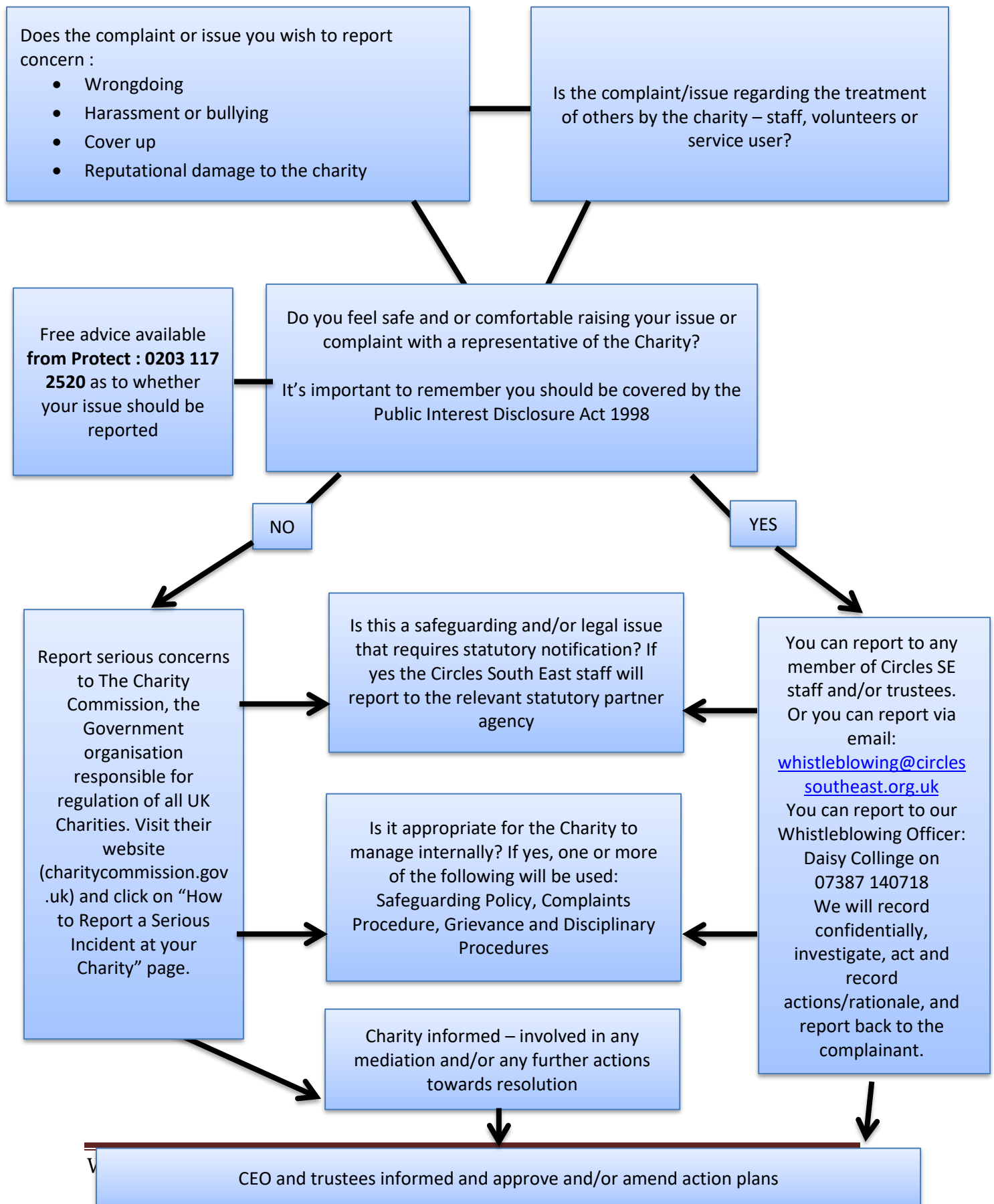
If receiving whistleblowing information a member of staff will then:

- Record the issue/incident. The Incident Reporting Form is a working document which records reported concerns, actions taken by whom, any follow up actions (again by whom) and how any issue/concerns have been resolved. A rationale for the resolution will also be recorded.
- In any case where there is a safeguarding or legal issue then relevant statutory agencies will be made aware of concerns (e.g. Police, Probation and/or Social Services)
- In any case where concerns involve partnership agencies, or a service user who is involved with other agencies then those agencies will be informed at an appropriate level. These notifications should be reported on the Incident Reporting Form.
- Report the issue to the Chief Executive Officer and Board of Trustees where any issue involves Safeguarding, grievance and/or disciplinary procedures, or any issue involving potential reputational damage to the Charity. These notifications should be recorded on the Incident Reporting Form. Where deemed appropriate the CEO will oversee the investigation and outcomes with Board oversight.
- From the initial reporting the incident(s) will be treated in the same way as a grievance complaint and the ensuing investigation will be conducted within the same parameters as the Circles South East Grievance Procedure, and completed within 28 days.
- The whistle-blower will receive acknowledgement of their complaint/issue raised within 1 working day. There will be a formal response from either the Whistleblowing Officer or where appropriate the Chief Executive with 7 working days of the original report. The investigation will be completed within 28 days and a response and findings will be fed back to the whistle-blower.
- All records relating to the complaint/issue reported (together with the identity of the whistle-blower if known) will be stored securely with access only granted to the Whistleblowing Officer, Chair and Vice Chair of Trustees

The Whistleblowing Officer – Daisy Collinge:

- Initially receives any whistleblowing concerns raised, conducts any ensuing investigation and response.
- Escalates concerns in conjunction with Safeguarding Lead, Trustee Lead with knowledge of CEO so that oversight of investigation and outcomes may be transferred appropriately, and third party agencies informed.
- Ensures appropriate support network is in place for whistleblowing witness.
- Ensures that policy is enacted.
- Ensures that appropriate independent advice and support are in place and that these are advertised signposted and available to all service users, staff and volunteers.
- Where a whistle-blower elects to engage with an independent organisation, endorses this and ensures Circles SE engagement with any processes (eg mediation/disciplinary procedures) recommended by that organisation.
- Is responsible for contacting relevant authorities (eg Police) where necessary. Where there is disagreement about response thresholds not being reached enacting Circles SE risk escalation procedure (in conjunction with CEO and Safeguarding lead) and informing relevant authority's management team.
- Ensures that confidentiality is maintained of all whistleblowing records and follow up information.

WHISTLEBLOWING PROCESS FLOWCHART FOR COMPLAINANT/STAFF/VOLUNTEERS



Safeguarding and Protection from Abuse Policy

Reviewed by:
Dom Williams, Safeguarding Lead
December 2022

Policy Objectives:

The objective of this policy is to:

- Ensure safeguards are in place to protect the children, young people, adults and those in direct contact with service users at risk with whom Circles South East works.
- For the purposes of this policy, Core Members are regarded as potentially adults at risk.
- To promote the welfare of children, young people and adults, taking reasonable measures to minimise risk to themselves and/or others.
- To be read in Conjunction with Safeguarding and Whistleblowing policies and procedures, together with the relevant flowcharts

Policy Scope:

Safeguarding is a term which is broader than 'protection' and relates to the action the organisation takes to promote the welfare of children, young people and adults at risk and protect them from harm.

This policy applies to anyone working on behalf of Circles South East including senior managers and the board of trustees, paid staff, volunteers, sessional workers, researchers and student placements.

Safeguarding Children and Young People

Safeguarding is defined in Working Together to Safeguard Children 2018 Guidance as:

- Protecting children and young people from maltreatment
- Preventing impairment of children and young people's health and development
- Ensuring children and young people grow up in circumstances consistent with the provision of safe and effective care, this includes a non-exhaustive list of basic care i.e. emotional stimulating, emotional warmth, clear boundaries, provision of basic food and shelter and good enough housing environments.
- Taking action in the event of a child or young person's health or developmental needs not being met.

Safeguarding Adults at Risk

Safeguarding is defined by the Care Act Statutory Guidance 2018 as protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect,

while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

It applies when an adult:

- Has needs for care and support
- Is experiencing or is 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, neglect or harm.

Policy Aims:

1. Circles SE aims to safeguard children, young people and adults at risk of harm.
2. Circles SE will aim to ensure that:
 - all Circles SE employees and volunteers involved in working with children, young people and adults at risk abide by the Code of Conduct to ensure a safe and healthy environment;
 - all Circles SE employees and volunteers are aware of safeguarding issues both in the context of organised activities and within the home and community;
 - standard procedures are in place to protect the children, young people and adults at risk, first and foremost when suspected abuse or actual abuse is reported and that all Circles SE employees and volunteers providing services for children, young people and adults at risk understand these procedures and sign a policy declaration form;
 - there is an ethos of mutual support amongst staff and volunteers so any questions and concerns may be challenged and shared;
 - when abuse is reported it is recognised that the child, young person or adult at risk is potentially at risk and safety is paramount. Circles SE will respond to any reported safeguarding concerns immediately and will ensure safety is evidenced, any concerns will be treated with the assumption that the person(s) is/are at risk.
3. Circles SE recognises that in providing services there is a need to provide and maintain a high degree of physical and emotional wellbeing for children, young people and adults at risk. Therefore the following procedures will be implemented:
 - make sure staff and volunteers are aware of the Safeguarding and Protection from Abuse Policy;
 - make sure that staff, volunteers, partner agencies and the public can effectively report concerns about children, young people or adults at risk.
 - operate sound recruitment and selection procedures for Circles SE employees and volunteers to ensure suitability for working with children, young people and adults at risk (on a later page of this document)

- identify within staff/volunteer supervision any training needs related to safeguarding and enable appropriate training to take place for employees and volunteers who work with children, young people and adults;
 - demonstrate best practice as within the Code of Conduct to ensure the safety of children, young people and adults at risk.
4. A glossary of the terms used is available in Appendix 1.
 5. A Safeguarding incident reporting/actions flowchart is provided in Appendix 5

Relevant Legislation

The following legislation and guidance have been taken into account in the development of this policy:

- The Rehabilitation of Offenders Act (1974)
- The Children Act (1989)
- The Police Act (1997)
- Public Interest Disclosure Act (1998)
- The Protection of Children Act (1999)
- Criminal Justice and Court Services Act (2000)
- Care Standards Act (2000)
- The POVA or Protection of Vulnerable Adults scheme launched 2004
- Every Child Matters and the Children Act (2004)
- Safeguarding Vulnerable Groups Act (2006)
- Equality Act (2010)
- Working Together to Safeguard Children (2015)
- The Care Act 2014
- All local threshold of needs – South East region
- Sexual offences Act 2003

Roles and Responsibilities:

1. **Trustee Safeguarding Lead** has overall responsibility for safeguarding.
 - They will receive and disseminate quarterly safeguarding reports to the Board. The report is to contain a resume of all safeguarding activity for each quarter, concerns, referrals, policy updates and training. All actions and outcomes are to be included in relation to each concern.
 - They will ensure that any concerns are cross-referenced with the risk register and will review any actions taken.
 - They will be notified immediately when safeguarding issues arise.
2. **Safeguarding Lead** is responsible for overall safeguarding oversight.

- This includes GDPR compliance, oversight of all safeguarding and risk escalation processes, referrals, ensuring all policies, procedures and practice guidance are adhered to. Reviews of these will take place annually.
- They will report at least quarterly to the CEO and Trustee Safeguarding Lead or in the event of a child protection referral or a criminal investigation.
- They are the individual management review author for cases of domestic homicide and/or mental health reviews.
- They will monitor and review staff and volunteer training and induction.

3. **Children and Vulnerable Adults Designated Officers** have responsibility for:

- Ensuring Circles SE operates procedures for dealing with allegations in accordance with local Safeguarding Boards;
- Referring concerns and liaising with local Children’s Social Services, Adult Social Services and police;
- Maintaining detailed and accurate written records of safeguarding and protection concerns;
- Ensuring staff and volunteers have access to and understand the Safeguarding and Protection from Abuse Policy, and is responsible for this document and its compliance;
- Ensuring all staff and volunteers receive safeguarding induction training which includes sharing the Safeguarding and Protection from Abuse Policy, staff Code of Conduct and identity of designated officers;
- Ensuring safeguarding skills and competencies are refreshed every year for all staff and volunteers, appropriate for their role;
- Ensuring the organisation is suitably represented at any multi-agency meetings, case conferences and Multi Agency Public Protection Arrangement (MAPPA) meetings where appropriate.

The list of Circles SE Designated Officers can be found in Appendix 4.

4. **Whistleblowing Officer** oversees any whistleblowing concerns raised and are responsible for:

- Ensuring investigations take place and respond to concerns raised
- Escalating concerns in conjunction with the Safeguarding Lead and Trustee Safeguarding Lead with the knowledge of the CEO
- Ensuring an appropriate support network is in place for any whistleblowing witness.
- Ensuring that the policy is acted on appropriately.
- Ensuring that appropriate independent advice and support are in place and that these are advertised, signposted and available to all service users, staff and volunteers.
- Contacting relevant authorities (eg Police) where necessary.
- Where a whistleblower elects to engage with an independent organisation (ie The Charity Commission), the Whistleblowing Officer will endorse this and ensure Circles SE engagement with any processes (eg. mediation/disciplinary procedures) recommended by that organisation.

Recruitment and Disclosure and Barring:

Safer Recruitment for Staff and Volunteers

Information provided by applicants and referees will be scrutinised where applicable by:

- Taking up and satisfactorily resolving any discrepancies or anomalies
- Verifying identity and any essential academic or vocational qualifications
- At least two references being taken for successful candidates; references are followed up and verified.
- All interview panels containing a member of staff with up to date safer recruitment training
- Making an application for a Disclosure and Barring Service, with or without barring list check (where required)
- Conducting an overseas criminal record check (where appropriate)
- Conducting a prohibition order check (where appropriate).

Training and supervision

1. Designated safeguarding leads are responsible for ensuring members of staff and volunteers have the appropriate level of training for their role
2. The type of training should reflect the job role and responsibilities given to the member of staff and volunteer.
3. All Youth volunteers are required to engage in either group or individual supervision with the Youth and Family Service Lead every four weeks.
4. All members of staff and volunteers who are:
 - In contact with children, young people or adults at risk during the normal course of their role, or working directly with children or young people will be required to complete local Children's Safeguarding Board General or Specialist Training or equivalent, appropriate to their role.
 - Working directly with adults at risk will be required to complete in-house training or training through local Adult Safeguarding Boards or equivalent, appropriate to their role.
 - Working directly with children, young people and adults at risk will refresh their training every two years.
 - Responsible for children, young people and adults at risk will refresh their training every year.
5. The Designated Officers will be required to attend Specialist Safeguarding Children training and/or Safeguarding Adults training, appropriate to their role. The training will be refreshed every two years.

6. The Trustee Safeguarding Lead will be required to attend Designated Lead Safeguarding Children training and Safeguarding Adults training. The training will be refreshed every two years.

Raising Concerns about Children, Young People or Adults at Risk:

You may become concerned about the safety or welfare of a child, young person or adult at risk in a number of ways:

- The person may tell you
- The person may say something that worries you
- A third party may voice concerns
- You may see something – an incident or an injury or other sign.

(Appendix 2 provides a list of definitions of abuse of children and young people. Appendix 3 provides a list of definitions of abuse of adults at risk).

Procedure for dealing with concerns

Safeguarding

1. All concerns that a child, young person or adult at risk has been harmed or is at risk must be reported to your Coordinator or a Designated Officer/Safeguarding Lead at the earliest opportunity.

The Safeguarding Lead is responsible for:

- a. Reporting any concerns relating to children and young people to the Local Authority Designated Officer (LADO) if abuse is identified or suspected.
 - b. Ensuring all professionals, parents/guardians involved with a child or young person are informed of any safeguarding concerns, in compliance with GDPR.
 - c. Reporting concerns relating to adults at risk to local Adult Social Care Team.
 - d. Completing the Circles SE incident reporting form, which should:
 - Be detailed with concerns and nature of risk
 - Be factual (who, what, where, when, how)
 - Be supported by available evidence e.g. a summary of what has been disclosed
 - Provide details of all actions taken
 - Include a detailed outline of outcomes and follow up actions required
 - Be copied to the senior safeguarding team
 - Should include comment and/or conclusion by Safeguarding Lead Officer
2. If you are not sure as to whether an external referral is required you can contact Children's Social Care or Adult Social Care and ask for a 'No Name' consultation.

This is where you discuss the situation without mentioning names or details of the persons involved. You will then be advised as to whether a Referral is required or of other steps that you should take.

3. Where there is disagreement about response thresholds not being reached, triggering the Circles SE risk escalation procedure (in conjunction with the CEO and Safeguarding Lead), it may be necessary to escalate concerns in writing, informing the relevant authority's senior management team.
4. Circles SE Senior management team in conjunction with the Safeguarding Lead will ensure there is a robust contextualising safeguarding process of concerns planned and reviewed, in order to support all parties involved.

Emergencies

1. Where an immediate police or medical response is required e.g. if the child, young person or adult at risk is in immediate danger of harm/injury you should contact the emergency services and inform your Coordinator or Line Manager or a Designated Lead at the earliest opportunity once it is safe to do so.

Responding to Verbal Allegations of Abuse

1. The person who receives the information concerning the actual/suspected case of abuse should:
 - React calmly and quietly
 - Take the allegations seriously
 - Say little and give time for the other person to talk
 - Keep questions to an absolute minimum, not probe or lead i.e. "tell me... explain to me... describe to me..." or "who", "what", "when" etc.
 - Explain confidentiality and that information will be shared and why it must be shared – namely to keep the person safe as well as others who may be at risk of harm
 - Explain what will happen after disclosure
 - Make a full record of what has been said within 24 hours
 - Pass the information onto your Coordinator or Designated Lead
2. Always:
 - Listen with a non-judgemental attitude
 - Ensure all communication is characterised by openness, honesty, reliability, trustworthiness and rigorously applied boundaries

Procedure for Allegations of Abuse Involving Circles SE Staff or Volunteers

1. If an allegation of abuse is made against a member of staff it should immediately be brought to the attention of the CEO of Circles SE
2. If an allegation of abuse is made against a volunteer it should immediately be brought to the attention of the Safeguarding Lead

3. In either case all allegations of abuse against a member of staff or volunteer will be reported to the Local Authority Designated Lead and the initial consultation will be guidance on the next steps directed by the LADO and followed by Circles SE.

Acceptable and Unacceptable Behaviour

Circles SE is committed to ensuring staff and volunteers behave appropriately when working with children, young people and adults at risk.

Please also refer to the Circles SE Code of Conduct.

Appendix 1 – A glossary of terms used

Members of Staff

1. All members of staff employed by Circles SE, permanently or temporary and contract staff

Volunteers

2. All persons who volunteer for Circles SE whether permanently or on an ad hoc basis

A Child

3. Is defined as a person who is of compulsory school age (a child is of a compulsory school age until the last Friday in June in the school year which they reach 16).

A Young Person

4. Is defined as a person under the age of 18

An Adult at Risk

5. Is defined as a person aged 18 years or over:
 - Who is or may be in need of care or support. Who is experiencing, or is at risk of, abuse or neglect, and
 - As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it
 - This could include:
 - People with dementia
 - People with learning difficulties
 - People with mental health problems
 - People with drug and alcohol problems
 - People with sight and hearing or physical disabilities
 - People who through age or illness are dependent upon other people to help them
 - People who care for others
 - For the purposes of this policy Core Members are classed as adults at risk

Core Member

6. A person who has a sexual offence conviction or who is displaying sexually harmful behaviours and is supported by Circles SE.

Local Safeguarding Children's Board

7. The Children's Act 2004 requires each local authority to establish a Local Safeguarding Children's Board (LSCB). The LSCB is the key statutory mechanism for agreeing how all relevant organisations in the local area will cooperate to safeguard and promote the welfare of children, young people, and for ensuring the effectiveness of their arrangements for safeguarding.

Local Safeguarding Adults Board

8. The Care Act 2014 requires each local authority to establish a Safeguarding Adults Board (SAB) for its area. The SAB is the key statutory mechanism for agreeing how all relevant organisations in the local area will cooperate to safeguard and promote the welfare of adults at risk, and for ensuring the effectiveness of their arrangements for safeguarding.

Disclosure and Barring Service

9. The DBS combines the functions of the ISA and the CRB into one organisation. It operates the vetting and barring scheme which aims to prevent unsuitable people from working with children, young people or adults at risk and conducts criminal record checks to enable an assessment to be made on the suitability of a person to care or work with children, young people or adults at risk.

Trustee Safeguarding Lead

10. A member of the Circles SE Board who has responsibility for ensuring the charity discharges its duty to safeguard and protect children, young people and adults at risk.

Designated Officer

11. Is a term used throughout this policy to describe the Circles SE employees who have responsibility for handling all cases of abuse / suspected abuse within Circles SE.

Appendix 2 – Definitions of abuse used against children and young people

****This list is by no means exhaustive****

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. This includes child on child harmful sexual behaviour

The activities may involve physical contact, including penetrative (i.e. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Physical Abuse

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

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless, unloved or inadequate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development capability, over-protection and limitation of exploring and learning, or preventing the child from participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children to feel frightened or in danger or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of children.

Neglect

Neglect is the persistent failure to meet the child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health and development. Neglect may occur during pregnancy as a result of maternal substance misuse.

Child Sexual Exploitation

Sexual exploitation is where a young person under 18 receives 'something' (e.g. food, accommodation, drugs, gifts, money) as a result of performing, and/or others performing on them, sexual activities.

Child sexual exploitation can occur through use of technology, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases the person exploiting the young person has power over them by virtue of age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common. The involvement in exploitative relationships is characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is defined by the World Health Organisation as:

“all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons”.

FGM is sometimes referred to as Female Circumcision or Female Genital Cutting however this does not depict the nature or impact of the practice.

FGM is based in ancient beliefs surrounding the need to control women's fertility and sexuality. It is a cultural practice based on custom and tradition. It is also based on the incorrect belief that it protects a girl's virginity, protects family honour, is more hygienic, desirable, and attractive and increases sexual pleasure for men. It is practiced to enhance a girl's prospects of marriage. It is carried out in the name of culture and religion. FGM is not a requirement of any religion. It is practiced by Christians, Muslims, Jews and non-believers in a wide range of communities and cultures. FGM is most frequently carried out on young girls between infancy and the age of 15.

Female Genital Mutilation has a devastating impact on the health and wellbeing of women and young girls, for some it may be fatal. Short term problems caused by FGM include severe pain and emotional shock.

Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Children and young people can be radicalised in different ways:

- They can be groomed either online or in person by people seeking to draw them into extremist activity. Older children or young people might be radicalised over the internet or through the influence of their peer network – in this instance their parents might not know about this or feel powerless to stop their child's radicalisation;
- They can be groomed by family members who hold harmful, extreme beliefs, including parents/carers and siblings who live with the child and/or person(s) who live outside the family home but have an influence over the child's life;

- They can be exposed to violent, anti-social, extremist imagery, rhetoric and writings which can lead to the development of a distorted world view in which extremist ideology seems reasonable. In this way they are not being individually targeted but are the victims of propaganda which seeks to radicalise.

A common feature of radicalisation is that the child or young person does not recognise the exploitative nature of what is happening and does not see themselves as a victim of grooming or exploitation.

The harm children and young people can experience ranges from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to young children being taken to war zones and older children being groomed for involvement in violence.

Appendix 3 – Definitions of abuse against adults at risk

****This list is by no means exhaustive****

Physical Abuse

Being physically hurt or harmed, or put at risk of harm, either deliberately or through rough, careless or thoughtless behaviour.

Sexual Abuse

This includes all unwanted sexual acts or being made to do something that you don't want to, didn't or couldn't agree to. Sexual abuse does not have to be physical, for example it could include jokes or comments or being made to watch, look at or listen to something that makes you feel uncomfortable or embarrassed.

All adults have the right to express their sexuality. However, where there is any doubt as to a person's capacity to make informed decisions it is essential that the concern is reported and the necessary assessments are carried out in accordance with the Mental Capacity Act.

Emotional Abuse

Being humiliated or put down or made to feel anxious, frightened or intimidated. Some level of emotional abuse is involved in all forms of ill-treatment, though it may also be happening on its own. Emotional abuse is often the first sign of other forms of abuse happening.

Financial or Material Abuse

This includes theft, fraud, or exploitation and the misuse of position of power or authority for financial gain.

Neglect or acts of omission

- Ignoring a person's medical or physical care needs
- Withholding the necessities of life, such as medication, food/drink and heating
- Failure to provide access to appropriate health, social care or educational services.

Neglect may also occur where there is failure to take appropriate action to safeguard a person's welfare or to be negligent in the face of risk.

Concerns or allegations of physical or sexual abuse are often seen as more serious than neglect. But long standing physical neglect is often a major factor in deaths from abuse.

Institutional/Organisational abuse

This can sometimes happen in residential homes, nursing homes, group living environments, hospitals. It can also occur in organisations that don't offer residential services. The abuse is when people are mistreated because of poor or inadequate care, neglect or poor practice.

Modern Slavery

Modern slavery includes offences of slavery, servitude, sexual exploitation and forced or compulsory labour and human trafficking.

Exploitation

Exploitation is the deliberate maltreatment, manipulation or abuse of power and control over another person. It is taking advantage of another person or situation usually, but not always, for personal gain.

Domestic Abuse:

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so-called 'honour' based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence.

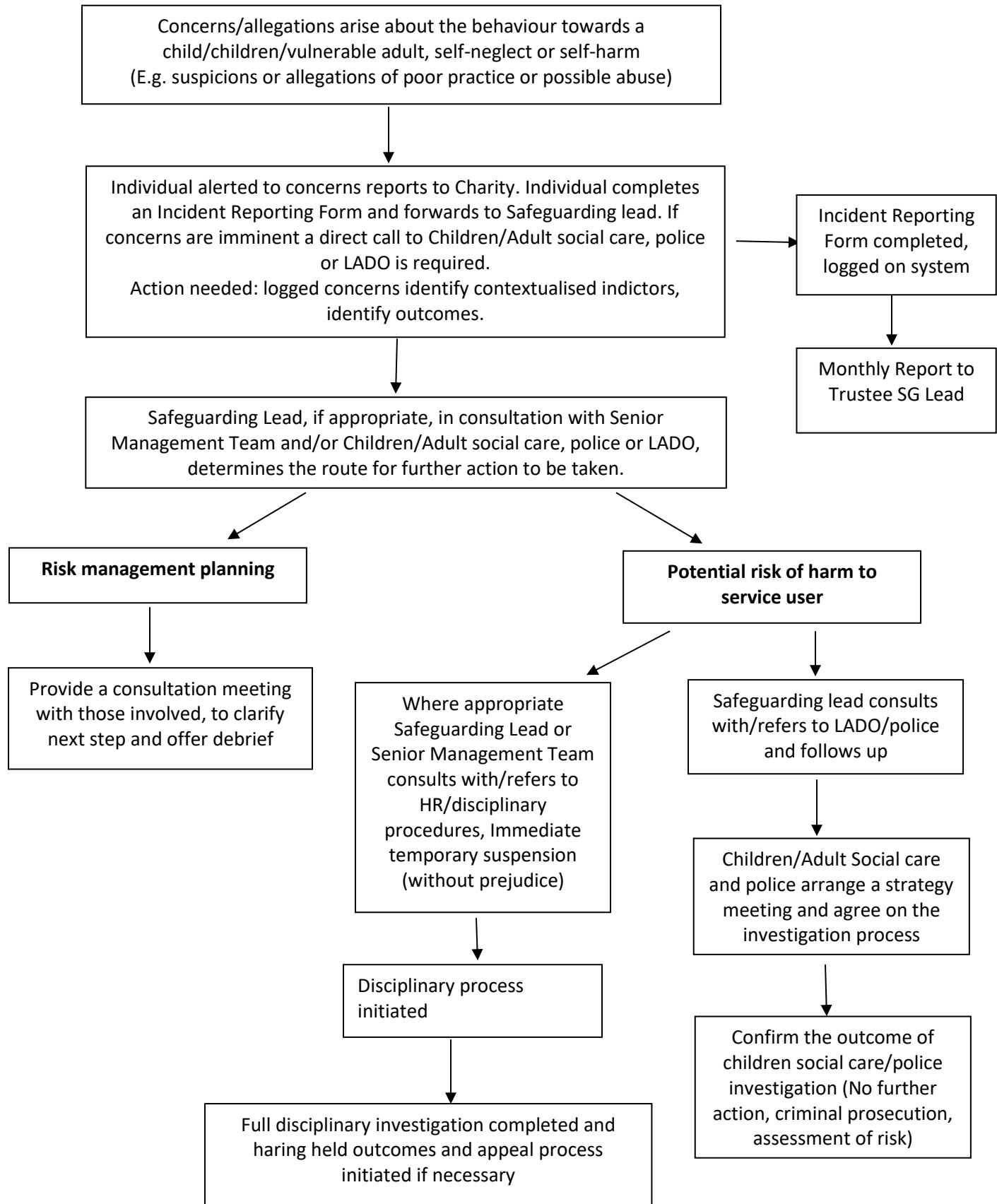
Mate Crime

This occurs when someone befriends a vulnerable adult in order to exploit, hurt or harm them. This can include sexual abuse, forced prostitution, financial exploitation, physical abuse or other violence.

Appendix 4 – Circles SE Designated Safeguarding Officers

- Elizabeth Jones – **Circles South East Trustee Safeguarding Lead** - 01235 816050
- Dom Williams – **Circles South East Safeguarding Lead** – 01235 816050/07918 083903
- Lesley Martin – **Circles South East (Child and Adult Focused) Designated Safeguarding Officer** – 01235 816050/07393 233897
- Susie Hunt – **Circles South East (Adult Focused) Designated Safeguarding Officer** - 01235 816050/07776 959207
- Dan Leigh – **Circles South East (Child Focused) Designated Safeguarding Officer** - 01235 816050/07776960499
- Circles South East HQ – 01235 816050 (Normal office hours 9am – 5pm Monday to Friday)
Out of Hours No: 0300 303 0781 (5pm – 9pm Monday to Friday)
(Circles SE staff rota system applies, all concerns will then be reported to the Safeguarding Lead)

Appendix 5 – Circles South East safeguarding procedure flowchart





CIRCLES SOUTH EAST

POLICIES AND PROCEDURES

VOLUNTEER DECLARATION

I hereby acknowledge receipt of Circles South East Volunteer Policies and Procedures, Staff and Volunteers Code of Conduct and Incident Reporting Procedures, and the Circles Volunteer Training Manual.

I confirm that I have read and understood the Policies and Procedures and that I agree to carry out the duties undertaken as a Circles Volunteer within the terms and conditions laid down.

I am aware that the Policies and Procedures may be updated from time to time and I agree that I will need to accept these updates as they arise. I understand that Circles South East will inform me of any significant changes to policies as they occur.

I understand that I should raise any issues or concerns arising from these terms and conditions at my regular supervision sessions with the Circles Coordinator.

Signed:

Date:

Name:

Please sign and date and return to:

info@circlessoutheast.org.uk