

Safeguarding Policy and Code of Behaviour - Protecting Children, Young People and Adults from Harm

Safeguarding Policy

1. Purpose and scope

This policy demonstrates our commitment to protect people, who come into contact with CleanupUK through our work, from abuse or mistreatment of any kind.

Trustees, staff, freelance staff and volunteers in CleanupUK recognise and accept our responsibilities to develop the awareness of the issues that may cause children, young people and adults harm.

CleanupUK recognises that the protection of children and adults is everyone's responsibility and all trustees, staff and volunteers have a responsibility to report any witnessed or suspected abuse to the relevant person and to act appropriately. Additionally, we have a duty to our colleagues and ourselves to ensure that we do not place each other or ourselves in vulnerable situations.

This policy document makes it clear how CleanupUK will:

- Protect people from harm
- Make sure people can raise safeguarding concerns
- Handle allegations or incidents
- Respond, including reporting to relevant authorities

Legal framework:

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

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 2018
- Sexual Offences Act 2003
- Children Act 2004
- Protection of Freedoms Act 2012
- The Care Act 2014
- NHS and Community Care Act 1990

- The Mental Capacity Act (2005)
- The Safeguarding Vulnerable Groups Act 2006
- Relevant government guidance on safeguarding children and adults

2. Policy Statement

CleanupUK wishes to provide a safe environment for everyone involved with the organisation and participating in CleanupUK's projects. CleanupUK supports community-based organisations with local people of all ages in local communities. Our role is to help identify potential safeguarding issues and to report concerns to the designated safeguarding lead for the community partner organisation or litter-picking group. Whilst we are not expected to be experts, we make sure we recognise 'tell-tale' signs and know how to report concerns to the relevant professionals.

CleanupUK will therefore:

- Promote good practice and work in a way that can prevent harm, abuse and neglect
- Ensure any allegations of abuse or suspicions are reported appropriately

All allegations of abuse will be taken seriously and treated in accordance with CleanupUK and Local Authority procedures. CleanupUK will report any suspected or discovered instances of abuse to the designated safeguarding lead for the community partner organisation or litter-picking group.

The policy applies to all staff, including managers, temporary and agency staff, Board members, volunteers and service users. This policy and procedures will be reviewed annually to enable constant reflection and improvement in light of legislation changes, best practice and learning.

3. Principles

To ensure good safeguarding governance, we adopt 7 key principles in line with the Charity Commission's advice.

Principle 1

Ensure an adequate safeguarding policy, code of conduct and any other safeguarding procedures are in place and reviewed regularly to ensure they are fit for purpose and in line with new advice or regulations

Principle 2

Identifying possible and prospective risks, including to beneficiaries or to anyone else connected to the charity.

Principle 3

Consider how to improve the safeguarding culture within the organisation (e.g. regular agenda item at meetings, type and frequency of training, clarity and confidence of reporting / escalation, accurate recording).

Principle 4

Ensure everyone involved with CleanupUK knows how to recognise, respond to, report and record safeguarding concerns.

Principle 5

Ensure people know how to raise a safeguarding concern (staff, volunteers, etc.)

Principle 6

Regularly evaluate any safeguarding training provided, ensuring it is current, relevant and fit for purpose.

Principle 7

Have a risk assessment process in place (as attached)

3. Definitions

Child

A child is legally defined as anyone up to and including the age of 18 in the Children Act 1989.

Vulnerable Adult

A vulnerable adult is someone who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

CleanupUK recognises that some vulnerable adults will have the capacity to speak for themselves (please see Mental Capacity section below). All CleanupUK staff and volunteers should be aware of this at all times and treat each incident individually, based on the person's circumstances at the time.

Abuse

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual, or emotional. It also includes acts of neglect or an omission to act.

It is essential that our staff, volunteers, trustees and any other individuals involved with our work recognises signs of abuse or mistreatment to enable them to report it.

Abuse and mistreatment includes:

- physical abuse: occasions when parents, adults or other children deliberately inflict injuries or knowingly do not prevent such injuries from occurring. It includes hitting, slapping, punching, burning, misuse of medication, inappropriate restraint, giving children alcohol, inappropriate drugs or involving them in activity which disregards the capacity of the child's immature and growing body.

- sexual abuse: occurs when adults use children/vulnerable adults to meet their own sexual needs, including rape, indecent assault, inappropriate touching, exposure to pornographic material. This also includes suggestions that sexual favours can help (or refusal can hinder) a career.
- psychological or emotional abuse: including belittling, name calling, threats of harm or abandonment, intimidation, isolation, depriving someone of contact with someone else, humiliation, blaming, controlling, putting pressure on someone to do something, harassment, verbal abuse, exploitation and radicalisation, cyber bullying, or unreasonable and unjustified withdrawal of services or support networks.
- financial or material abuse: including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits, internet scamming, putting pressure on someone about their financial arrangements
- neglect and acts of omission: refers to the persistent failure to meet a child's/vulnerable adult's basic physical and or psychological needs, likely to result in the serious impairment of their health or development, including withholding the necessities of life such as medication, food or warmth and ignoring medical or physical care needs
- discriminatory abuse: harassment or insults because of someone's race, gender or gender identity, age, disability, sexual orientation or religion.
- bullying – bullying can be verbal and physical, delivered by text message or through on-line messaging and via social networking sites, and is also a form of abuse and there is a requirement for all those associated with CleanupUK to ensure that children/vulnerable adults feel able to report instances of bullying.

Abuse or mistreatment may be carried out deliberately or unknowingly. It may be a single act or repeated acts. People who behave abusively come from all backgrounds and may be known or unknown to the person experiencing abuse.

We may observe concerns ourselves or, as a trusted charity, we may be approached to raise a concern about a person in the community. Concerns may also be raised about us where a staff member, volunteer, trustee or other associated individual is accused of not behaving properly.

We create a safe environment for anyone to raise a concern and we make sure we spot 'tell-tale' signs. Everyone working with CleanupUK is aware of how to refer a concern, which is detailed in item 7 below.

4. Awareness

It is essential that we are clear on our expectations on spotting safeguarding concerns and when interacting in communities on behalf of CleanupUK.

The code of behaviour contained in this document is our key guidance to all involved.

We provide on-line safeguarding training to staff, volunteers and trustees as appropriate.

We revisit the training contents regularly to make sure our training material is fit for purpose.

In some cases a person's disturbed behaviour, or an injury, may suggest that they have been abused. In many situations, however, the signs will not be clear cut and decisions about what action to take can be difficult.

Important note: it is not the responsibility of those working with a child/young person or vulnerable adult to decide that abuse is occurring, but it is a responsibility to follow through on any concerns.

Possible signs include:

- Uncharacteristic changes in their behaviour, attitude and commitment e.g. becoming quiet and withdrawn or displaying sudden outbursts of temper.
- Bruises and injuries not typical of, for example, taking part in a sporting event or injury for which the explanation seems inconsistent.
- Signs of discomfort and pain.
- They become increasingly dirty or unkempt.
- They lose weight for no apparent reason.
- Nervousness when approached or touched.
- Fear of particular adults – especially those with whom a close relationship would normally be expected.
- The child wishes not to speak with or be near a particular person without a reasonable explanation.
- Inappropriate sexual awareness.
- Children who are always alone and unaccompanied and/or are prevented from socialising with other children.
- Children who are reluctant to go home.

It must be recognised that the above list is not exhaustive and the presence of one or more indicators is not proof that abuse is actually taking place.

A. Mental Capacity

The Mental Capacity Act 2005 is a legal framework which protects people who may lack capacity to make decisions for themselves. It also sets out how decisions should be made on their behalf. The act covers all sorts of decisions, from lifechanging events to everyday matters.

All safeguarding decisions CleanupUK takes must be in accordance with the act.

The act states that: "... a person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or disturbance in the functioning of the mind or brain."

A person is not able to make a decision if they are assessed as unable to do any one of the following:

- Understand the information relevant to the decision; or
- Retain that information; or
- Use or weigh that information as part of the process of making the decision; or

- Communicate their decision (whether by talking, using sign language or any other means).

The presumption is that adults have mental capacity to make informed choices about their safety and how they live their lives.

Every time we become involved on a safeguarding issue, we need to take into account the person's capacity and their ability make informed choices to enable us to act accordingly.⁵

Handle and report incidents and concerns

For any incident or allegation of abuse, we carry out the following steps:

- handle and record it in a secure and responsible way
- follow our safeguarding policies and procedures
- act quickly, ensuring we stop or minimise any further harm or damage
- report it to the designated person in full
- plan what to say to those involved with CleanupUK and the media if appropriate
- are open and transparent based on our commitment to act with integrity
- review what happened, to understand how to stop it from happening again

It is important to stress that it is not the responsibility of anyone working for CleanupUK to decide whether or not abuse has taken place. However, there is a responsibility to act on any concerns through contact with the designated person and/or the statutory authorities. If you have such concerns, contact the designated person who will in turn contact the appropriate agencies.

We **report any concerns** as follows:

1. To the ***police if the incident or concern is serious and requires immediate attention or involves criminal behaviour*** and to the ***designated person*** as listed in item 7.
2. To the ***designated person*** (as detailed in item 7 below) who then refers the case to the relevant ***safeguarding team / social services of the local authority*** where the incident or concern was observed or raised. The relevant contact number or e-mail will be displayed clearly on the Local Authority's website.
3. To the ***Chief Executive of CleanupUK or to another trusted staff member if an allegation*** is made about a staff member, volunteer or Trustee. (See details below in item 7.)

The following procedure should be followed when a child/vulnerable adult discloses to you an allegation of abuse:

- Stay calm, listen carefully to what is being said
- Treat any allegations extremely seriously and act at all times towards the child/vulnerable adult as if you believe what they are saying
- Find an appropriate early opportunity to explain that you will have to tell another adult – **do not promise to keep secrets**
- Allow the child/vulnerable adult to continue at their own pace

- Ask minimal questions for clarification only and at all times avoid asking questions that suggest a particular answer and don't jump to conclusions
- Reassure them that they have done the right thing in telling you and that they are not to blame
- Tell them what you will do next and with whom the information will be shared and keep them up to date with what is happening
- Tell the designated person as soon as possible – it is important to take further action as you may be the only person in a position to prevent future abuse
- Record in writing what was said using the person's own words as soon as possible. It is important to make a note of what was actually said and not your interpretation/understanding of any allegation/disclosure. Note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated and kept confidential under lock and key.

What to do after a child/vulnerable adult has talked to you about abuse

The following procedure should be followed:

1. Make notes as soon as possible (ideally within 1 hour of being told) - you should write down exactly what the person has said, using their words as much as possible and what you said in reply and what was happening immediately before being told (i.e. the activity being delivered). You should record the dates, times and when you made the record. All hand-written notes should be kept securely.

You should use the form **"Reporting allegations or suspicions of abuse"**. This form is attached at the back of this policy. (Appendix 1)

2. You should report your discussion to the designated person as soon as possible.

3. You should under no circumstances discuss your suspicions or allegations with anyone other than the designated person (or deputy designated person, in their absence) or with the statutory authorities.

4. After a child/vulnerable adult has disclosed abuse, the designated person should carefully consider whether or not it is safe for them to return home to a potentially abusive situation. On these occasions, it may be necessary to take immediate action to contact Social Services and/or the Police to discuss putting safety measures into effect.

Allegations against staff members/volunteers

CleanupUK will assure all staff/volunteers that it will fully support and protect anyone who, in good faith, reports their concern that a colleague is, or may be, abusing a child/vulnerable adult.

Where there is a complaint against a member of staff, there may be three types of investigation:

- A criminal investigation,
- A safeguarding investigation,

- A disciplinary or misconduct investigation.

The results of the police and safeguarding investigation by the Local Authority may well influence the disciplinary investigation but not necessarily.

However, if a staff member knowingly or maliciously makes an untrue allegation, CleanupUK will take appropriate disciplinary action against them. It may constitute gross misconduct.

6. Recording of incidents

We record accurately and securely (in line with GDPR guidance) any incident we observed and referred and any case that was reported to us.

We also record any allegation of inappropriate behaviour by our staff, volunteers, trustees or other associated individuals.

Any confirmed incident involving staff, volunteers, etc is reported to the Board immediately through the dedicated safeguarding champions at all levels.

Failure to record any incidents by staff might result in disciplinary action.

7. Designated Named Person

CleanupUK has an appointed individual who is responsible for dealing with any safeguarding concerns. In their absence, a deputy will be available for consultation. The Designated Named Persons for Safeguarding in CleanupUK is as follows:

Level	Report Type	Name and Position	Contact Details	Deputy (in case of absence)
Operational	All incidents or concerns	Sarah Hayes Head of Operations	sarah.hayes@cleanupuk.org.uk 07469 660842	Chief Executive
Executive	Allegations against staff, volunteers, Trustees	George Monck Chief Executive	george.monck@cleanupuk.org.uk 07796 691220	Chair
Board	All safeguarding concerns	Georgina Fletcher Chair	georgina.fletcher@cleanupuk.org.uk 07825 354103	Deputy Chair of Board*

* Deputy Chair is Ashley Gray : ashley.gray@cleanupuk.org.uk, 07872 171111

Safeguarding Code of Behaviour

The Code of Behaviour applies to all Staff, Volunteers and Trustees

1. Preventing Abuse and Mistreatment

- 1.1 Trustees, staff and volunteers **should not** spend excessive amounts of time alone with children, young people or adults, away from others.
- 1.2 Trustees, staff and volunteers are **advised not to** make unnecessary physical contact with children, young people or adults. However, there may be occasions when physical contact is unavoidable, such as providing comfort at times of distress, or physical support in outdoor activities or similar. In all such cases contact should take place only with the consent of the child, young person or vulnerable adult.
- 1.3 It is **not good practice** to take children, young people or vulnerable adults alone in a vehicle, however short the journey. Where this is unavoidable, it should be with the full knowledge and consent of the parents (or guardians) and of the person in charge of the event.
- 1.4 Trustees, staff and volunteers **must not** meet children, young people or vulnerable adults outside organised activities, unless it is with the knowledge and consent of the parents/guardians and of the person in charge of the event.
- 1.5 Trustees, staff and volunteers **should not** start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. You should simply record the facts and report these to the designated person (please refer to item 7 in our safeguarding policy).
- 1.6 Trustees, staff and volunteers should **never** (even in fun) –
 - a. Initiate or engage in sexually provocative conversations or activity.
 - b. Allow the use of inappropriate language to go unchallenged.
 - c. Do things of a personal nature for children, young people or vulnerable adults that they can do themselves.
 - d. Allow any allegations made by a child or adult to go without being reported and addressed, or either trivialise or exaggerate abuse issues.
 - e. Make promises to keep any disclosure confidential from relevant authorities.
- 1.7 Trustees, staff or volunteers **should not** show favouritism to any one child, young person or adult, nor should they issue or threaten any form of physical punishment.

2. Issues to adhere to

- 2.1 Trustees, staff and volunteers **must respect** children's, young people's and adults' rights to privacy and encourage children, young people and adults to feel comfortable enough to report attitudes or behaviour they do not like.
- 2.2 Trustees, staff and volunteers **must be aware** of the procedures for reporting concerns or incidents and should familiarise themselves with the contact details of the designated persons.
- 2.3 If a trustee, member of staff or volunteer finds themselves the subject of inappropriate affection or attention from a child, young person or adult, **they should** make others aware of this.
- 2.4 If a trustee, member of staff or volunteer has any concerns relating to the welfare of a child, young person or adult in their care, be it concerns about actions/behaviours of another trustee, staff member or volunteer or concerns based on any conversation with the child, young person or adult, particularly where the child, young person or adult makes an allegation, they should report this immediately to the designated person.

3. Responding to people who have experienced or are experiencing abuse or mistreatment

- 3.1 CleanupUK recognises that it has a duty to act on reports, or suspicions, of abuse or neglect. It also acknowledges that taking action in cases of abuse or mistreatment is never easy.
- 3.2 How to respond if you receive an allegation:
- Reassure the person concerned
 - Listen to what they are saying
 - Record what you have been told/witnessed as soon as possible and send to the Chief Executive for placing in the "Policies" file
 - Remain calm and do not show shock or disbelief
 - Tell them that the information will be treated seriously
 - Don't start to investigate or ask detailed or probing questions
 - Don't promise to keep it a secret
- 3.3 If you witness abuse, or if abuse has just taken place, the priorities will be:
- To call an ambulance if required
 - To call the police if a crime has been committed
 - To preserve evidence
 - To keep yourself, staff, volunteers and service users safe
 - To inform the Designated Named Person
 - To record what happened and send to the Chief Executive for placing in the "Policies" file

All situations of abuse or alleged abuse will be discussed with the Designated Named Person.

If the individual experiencing abuse does not have capacity to consent, a referral will be made without that person's consent, in their best interests.

The Designated Named Person may take advice from any agency. This may require a referral to children's social care services, the independent Local Authority Designated Officer (LADO) for allegations against staff, trustees and other volunteers, and in emergencies, the police.

4. Managing allegation(s) made against a trustee, member of staff or volunteer

CleanupUK will ensure that any allegations made against members or member of staff will be dealt with swiftly.

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

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

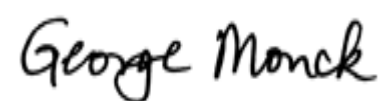
The Designated Named Person will liaise with Social Services to discuss the best course of action and to ensure that the CleanupUK's disciplinary procedures are coordinated with any other enquiries taking place as part of the ongoing management of the allegation.

5. Recording and managing confidential information

CleanupUK is committed to maintaining confidentiality, including personal and sensitive data, wherever possible and information around safeguarding issues should be shared only with those who need to know.

George Monck, Chief Executive

(Signed on behalf of the Board of Trustees)

A handwritten signature in black ink that reads "George Monck". The signature is written in a cursive style and is contained within a thin black rectangular border.

Date 17th April 2025

Receipt and Acceptance of CleanupUK’s Safeguarding Policy and Code of Behaviour

By signing and dating below you are confirming your understanding and acceptance of the above safeguarding policy and code of behaviour. Please retain one copy of this form for your records and return one copy to CleanupUK’s Chief Executive.

Name:

Signed:

Dated:

Appendix 1 – Reporting Allegations or Suspicions of Abuse: Confidential Recording Sheet

When this form has been completed, please return to CleanupUK's Chief Executive.

Name of person reporting: _____

Name of child/vulnerable adult: _____

Age and date of birth (if known): _____

Disability (if applicable and known): _____

Name of Child's Parent/Carer's (if known): _____

Phone numbers for parent/carers and child/ vulnerable adult (if known):

Are you reporting your concerns or reporting someone else's?

Please give details.

Brief description of what has prompted the concerns: include the following:

Date; time; specific incidents; who else, if anyone, was involved and how; what was said by those involved (using their own words); any other information you consider relevant. Not following this procedure could adversely hamper a police investigation stopping the case even getting to court.

Were there any obvious signs? e.g. bruising, bleeding, changed behaviour?

Have you spoken to the child/vulnerable adult? If so, how did they describe what happened?

Who has been told about it and when?

In the case of a child, do the parents/carers know?

Signature of person reporting:

Date of record:

Action taken:

Other Notes: