

MMMT Safeguarding Policy

Introduction and Purpose

The Mercantile Marine Memorial Trust is committed to safeguarding vulnerable people who engage with its services.

This purpose of this policy is to ensure the safety of all users, staff and volunteers and outlines the Trust's policy on identifying and responding to concerns regarding the safeguarding and protection of children, young people and vulnerable adults. The Trust recognises our responsibility to take all reasonable steps to promote safe practice and to protect vulnerable people from harm, abuse and exploitation.

This procedure provides guidance for all staff who may come across concerns of this nature within the context of their work for the Trust. It is in place to ensure that the Trust is following the requirements of the Safeguarding Vulnerable Groups Act 2006 and that these are adhered to at all stages of an individual's employment with the Trust, whether paid, contracted or voluntary in capacity.

It is mandatory for everyone working with the Trust to adhere to these safeguarding procedures and guidance. Any staff found not to have followed it may be subject to formal disciplinary action or alternative appropriate action if they are not an employee.

Scope and Definitions

This policy applies to all staff, including employees irrespective of their status or level, trustees, casual workers, volunteers, agency workers or anyone working on behalf of the Trust (collectively referred to as staff in this policy). This document is intended to provide a defined procedure and guidelines relating to safeguarding.

For the purposes of this policy, the following definitions apply:

Child - A child, as defined in the Children's Acts 1989 and 2004, is anyone 'who has not yet reached their 18th birthday.' The majority of the Trust's educational outreach will involve working with children. Children may also visit exhibitions held by the Trust.

Vulnerable Adult- A vulnerable adult, is defined as a person aged 18 and over who is or who may be in need of community care services because of age, illness, physical, mental health or other disability, or someone who is or may be unable to take care of or protect themselves against significant harm or exploitation (including those who have difficulty in communication and may need additional help).

The Trust may employ vulnerable adults and may offer volunteering opportunities to vulnerable adults. Vulnerable adults may also visit our exhibitions and may participate with community outreach activities and within focus groups particularly in relation to projects and exhibitions. It is very important in terms of disabled and older people's equality and rights not to assume someone is vulnerable just because of who they are.

Vulnerable People – Collectively children and vulnerable adults will be described as vulnerable people.

Responsibilities

Everyone

Safeguarding is everyone's responsibility: Not responding to a safeguarding concern is not an option. The Trust and everyone who works within it endeavours to safeguard vulnerable people by:

- Adopting safeguarding procedures for all which minimise any opportunity for abuse and establish appropriate treatment of children, young people and vulnerable adults.
- Ensuring that we provide a safe physical environment for everyone at our exhibitions by applying Health and Safety measures in accordance with legislation and regulatory guidance.
- Sharing information about the principles of safeguarding and good practice.
- Creating and maintaining an environment that promotes and respects dignity at work.
- Taking allegations seriously and responding fairly, swiftly and appropriately.
- Ensuring any accompanying individuals (parents, guardians, school teachers, etc.) are aware of their own responsibilities in relation to safeguarding.
- Sharing information about concerns with agencies who need to know and involving parents/carers as appropriate.
- Ensuring that safeguarding risks are considered in all activity risk assessments.
- Reviewing our policy and practice at regular intervals.
- Everyone working for the Trust must follow the code of conduct for working with Children, Young People and Vulnerable Adults (refer to Appendix 1).

Trustees

Trustees will safeguard vulnerable people by:

- Understanding their responsibilities for safeguarding as identified by the Charity Commission (refer to the Charity Commission for England and Wales Annex 1: trustee safeguarding duties explained).
- Assessing and managing risk.
- Ensuring ongoing monitoring and review of arrangements for the protection of vulnerable people to ensure that safeguards are being implemented and controls in place are effective.
- Ensuring that serious safeguarding incidents are reported to the Charity Commission and other appropriate safeguarding and regulatory bodies.
- Promoting the importance of safeguarding.

Recruitment and Selection

Individuals who have particular roles and responsibilities which involve directly working with vulnerable people carrying out regulated activity will be required to have a satisfactory

Disclosure and Barring Service (DBS) Enhanced Disclosure and a check to be made against the barring list for children and/or adults, as appropriate.

All employment advertisements or online employment information that relates to roles which are required to work with children, young people and vulnerable adults and undertake regulated activity will include the statement: 'In accordance with the Trust's safeguarding procedures, successful applicants will be subject to a satisfactory Enhanced DBS Disclosure and a check against the barred list for children and/or adults, as appropriate'.

At interview applicants will be required to account for any gaps in employment and provide a copy of photographic ID. Where candidates will be required to have an enhanced DBS check, interviewees for relevant posts will be asked appropriate questions relating to the fact the role will involve working with vulnerable people.

Learning and Development

The Trust will ensure that staff and the public has access to the Safeguarding policy and an understanding that the Museum has a duty to inform Children's or Vulnerable Adults Services or the Police, other governing bodies and the Charity Commission if there are concerns about abuse. This will be achieved by publicly publishing the policy and procedures on the Trust's website.

The Trust will ensure that all staff have access to training and/or awareness sessions as appropriate to their role and responsibilities. This will include training on the recognition of abuse and neglect and how to respond to such concerns.

Line managers will ensure that all new staff, as part of their induction, will be required to read and understand the safeguarding policy and procedures and to complete the appropriate safeguarding training.

Photography and Filming

The Trust may seek to take photographs and film of children, young people and vulnerable adults who are participating in organised activities for publicity purposes. Permission must be sought from the supervising adult with parental responsibility or carer for the child/vulnerable adult who will be asked to sign a "Use of Image (photograph/film)" consent form (refer to Appendix 6). Images will be stored on a secure drive with restricted access.

Where third party photographers are contracted to take photos, they will be asked to sign an agreement to pass copyright of all images to the Trust.

Where general photography is being taken – for example crowds gathered at an event or in an exhibition, signage should be placed alerting the public that photography is taking place.

Any visitor or member of the public who appears to be taking photographs or using video recording in suspicious or inappropriate circumstances should be challenged by a member of staff and asked to delete the photographs/videos containing children or vulnerable adults and it may be appropriate to contact the police.

Reporting a Safeguarding Concern

Safeguarding is everyone's responsibility and if anyone has a safeguarding concern it is vital that this is reported immediately, so that appropriate action can be taken to safeguard a vulnerable person at risk. Types of abuse are contained within Appendix 2.

All safeguarding concerns should be reported immediately to the Finance, Audit, and Risk Committee, who may choose to escalate the concern to the Main Board as appropriate. In the case of severe and immediate risk, then this should be reported directly to the relevant safeguarding agency or police.

In addition to managing the referral process, the Main Board will regularly review and develop the work of the Trust in delivering its duty of care, and to keep abreast of good practice initiatives and changes to legislation. Safeguarding will be included in the Trust's Risk Matrix.

Responding to Concerns, Signs or Suspicions of Abuse

There are 5 R's individuals can use to help safeguard vulnerable people:

- Recognising
- Recording
- Responding
- Referring
- Reporting

Recognising

Regardless of whether an individual directly works, indirectly works or volunteers with children and vulnerable adults, they may still have the opportunity to observe and identify behaviours which could indicate abuse or neglect. Everyone has a responsibility to be alert for signs that a child, young or vulnerable person is being abused or neglected. Types of abuse are contained within Appendix 2.

Safeguarding concerns may also be raised through the Trust's Whistleblowing Policy.

Recording

Good record keeping is an important part of safeguarding. If any member of staff, volunteer, agency worker or contractor who has concerns about a child, young person or a vulnerable adult, or who has a concern reported to them by a visitor, must report those concerns immediately to the Finance, Audit, and Risk Committee and an accurate written record of the incident needs to be made as soon as possible so that it can be referred to later. This can be done by completing the Safeguarding Incident Report (refer to Appendix 3).

Responding

Very occasionally a child, young person or vulnerable adult might disclose information about abuse they allege to have suffered/are suffering to a member of staff. In this instance, it is very important to remember that the person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether abuse has occurred. When responding to an allegation of abuse, all staff MUST:

- stay calm;

- listen carefully to what is said;
- find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others (not promising to keep secrets);
- allow the child, young person or vulnerable adult to discuss the issue at their own pace;
- ask questions for clarification only and avoid leading questions;
- reassure the child, young person or adult at risk that they have done the right thing in telling the staff member;
- tell them what they will do next and with whom the information will be shared;
- record in writing as soon as possible, using the Safeguarding Incident Report form (refer to Appendix 3), but using the child, young person or adult at risk's own words – noting the date, time, any names mentioned, to whom the information was given and ensuring that the record is signed and dated;
- contact the Finance, Audit, and Risk Committee immediately after a disclosure has been made
- NOT discuss the disclosure with anyone else.

Referring

The MMT Finance, Audit, and Risk Committee, once informed of the issue, will determine the necessary action to be taken. An accurate written record of the incident must be completed within 3 working days using the Action Report (refer to Appendix 4). The Committee should ensure that this is followed up after 3 days, if they have not had any confirmation of action/no action required after making a referral to an external safeguarding agency.

On occasion, the concerns may be so serious that they need to be referred directly and immediately to the police or Local Authority Social Care team. If required, the Committee will seek further advice and guidance immediately from an appropriate child/adult care service. The Committee will immediately inform the Main Board of any referrals.

When a referral is made, sharing information is essential to safeguarding. Decisions about how much information to share, with whom, and when, are important considerations. Consideration must be given to what might happen if the information is shared against the consequences of not sharing information.

Reporting

If a safeguarding concern involves a member of staff, a volunteer or a contractor to the Trust, Finance, Audit, and Risk Committee must be informed as soon as possible and the Main Board advised.

All safeguarding concerns shall be reported but discretion will be used as to whether it is most appropriate to report to a Board meeting or if the matter is so significant or sensitive that it should be reported urgently out of committee. Where a safeguarding incident has resulted in or risks significant harm to beneficiaries and other people who come into contact with the Trust through its work, or where it may harm the charity's work or reputation, the Chair of the Main Board will make a Serious Incident Report to the Charity Commission.

Confidentiality

The right of a vulnerable person to be protected takes precedence over a parent's/guardians/carer's right to confidentiality.

All Disclosure of Information Report forms in a secure electronic drive in compliance with GDPR.

Breach of Policy

A breach of this policy by an employee will be investigated as it is a disciplinary offence. A serious breach of this policy may be considered as gross misconduct which may result in dismissal.

A breach of this policy by a casual worker, agency worker, volunteer, freelancer, consultant or contractor may result in exclusion from the Trust and work will no longer be offered.

In certain situations, individuals may be reported externally to a governing or professional body. Where individuals are reported to the police, they may also face criminal and legal proceedings.

Any failure by Trustees to manage safeguarding risks adequately will be of serious regulatory concern to the Charity Commission.

Appendix 1- Code of Conduct for working with Children, Young People and Vulnerable Adults

You must ensure the safety and welfare of children, young people and vulnerable adults. If during your work you have direct or indirect contact with children, young people or vulnerable adults, or have access to information about them, you have a responsibility to safeguard and promote the welfare of vulnerable people. You must:

- always follow MMT's Safeguarding Policy and Procedures;
- approach any child or vulnerable adult apparently in distress and ask if you can help;
- seek assistance from colleagues or other adults in order to minimise the amount of time you are alone with the vulnerable person;
- ensure that whenever possible there is more than one adult present during activities with children and vulnerable adults, or at least that you are within sight or hearing of others; the adult present may be a teacher, group leader or parent, guardian, etc.;
- listen to and respect children and vulnerable adults;
- treat children and vulnerable adults fairly and without prejudice;
- value and take the contributions of children and vulnerable adults seriously;
- ensure any physical contact is appropriate and in relation to the nature of the activity (physical contact may be necessary in the case of emergencies but must remain appropriate and kept to a minimum at all times);
- always ensure language is appropriate and not offensive or discriminatory;
- recognise that special caution is required when you are discussing sensitive issues with children and vulnerable adults, and;
- challenge unacceptable behaviour and report all allegations or suspicions of abuse.

You must not:

- physically restrain a child or vulnerable adult except in exceptional circumstances (e.g. to prevent injury, damage to property or collections, or to prevent theft) and even then be careful to use only the minimal restraint necessary;
- patronise children or vulnerable adults;
- allow allegations or suspicions to go unreported;
- give out personal information, or share email, social network site details, or mobile phone numbers with any child or vulnerable adult;
- develop social relationships with children or vulnerable adults; if you do come into contact with those you have worked with in a social situation, try to maintain a professional distance;
- do things of a personal nature for a child or vulnerable adult that they can do for themselves or that a parent/guardian/carer/group leader can do for them;
- make personal remarks or discuss themes that encourage children or vulnerable adults to share personal information;
- use sarcasm or insensitive comments;
- act in a way that can be perceived as threatening or intrusive;

- make promises to children or vulnerable adults, particularly in relation to confidentiality;
- jump to conclusions about others without checking facts;
- either exaggerate or trivialise safeguarding issues, and;
- be complacent about the potential risks to others and yourself.

Appendix 2- Types of Abuse

Many types of abuse are also criminal offences and should be treated as such.

Types of abuse:

- Physical abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Discrimination

A person who is being abused may experience more than one type of abuse. Abuse can have immediate and long-term impacts on someone's well-being, including anxiety, depression, substance misuse, eating disorders and self-destructive conducts, offending and anti-social conduct.

Physical Abuse

Types of physical abuse:

- Assault, hitting, slapping, pushing, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Involuntary isolation or confinement
- Unauthorised restraint, restricting movement

Or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent, guardian or carer fabricates the symptoms of or deliberately induces illness.

Sexual Abuse

Types of sexual abuse:

- Forcing or enticing a vulnerable person to take part in abusive sexual activities
- Rape, attempted rape or sexual assault
- Indecent exposure
- Inappropriate touching anywhere
- Physical contact, including assault by penetration (e.g. rape or oral sex)
- Physical contact such as kissing, rubbing or touching outside of clothing
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Encouraging vulnerable people to behave in sexually inappropriate ways
- Indecent exposure

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Psychological or Emotional Abuse

Types of psychological or emotional abuse:

- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful social interaction or activities
- Intimidation, coercion, harassment, use of threats, humiliation, swearing or verbal abuse, including conveying to a vulnerable person that they are worthless or unloved, inadequate, or making fun of what they say or how they communicate
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Bullying including cyber bullying, causing a vulnerable person to feel frightened in danger, or exploited.

Emotional abuse is often the persistent emotional maltreatment of a vulnerable person such as to cause severe and persistent adverse effects on their emotional development.

Financial or Material Abuse

Types of financial or material abuse:

- Theft of money or possessions
- Being defrauded, scamming
- Undue pressure, duress, threat or undue influence put on the vulnerable person in connection with money, possessions or assets
- Exploitation of a vulnerable person's money or assets

Discrimination

Types of discriminatory abuse:

- Treating someone in a less favourable way and causing them harm, because of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids
- Harassment or deliberate exclusion on the grounds of a protected characteristic

Appendix 3- Safeguarding Incident Report Form

Name of child, young person, or adult at risk:	Age:
Any disability/support needs:	Language requirements
Address/contact details:	Name of parent/carer/guardian:
Are you reporting your own concerns or passing on those of someone else? Please provide details:	Brief description of what prompted the concerns, including dates and times etc of any specific incidents:
Any physical, behavioural or indirect signs?	
Have you spoken to the child or vulnerable adult at risk? If so, what was said:	
Have you spoken to the parent/carer/guardian? If so, what was said?	

Is anyone alleged to be the abuser? If so, provide details

Have you consulted with anyone else? If so, provide details

Please report this safeguarding incident to the Finance, Audit, and Risk Committee

Your name:

Job title:

Signature:

Date Reported:

Appendix 4- Safeguarding Action Report

Name of person reporting incident:
Date of reported incident:
Brief summary of the discussion held with the member of staff/volunteer reporting the incident:
Copy of safeguarding incident report obtained? (Yes/No)
Discussed with the Main Board? (Yes/No)
Please provide details of local authority the concern was reported to:
Date incident was reported to local authority:
Please outline all action taken (if no action taken, please summarise why):
Name:
Signature:
Date:

Appendix 5- Responsibilities for Schools and Groups

The Mercantile Marine Memorial Trust wishes to ensure that children and vulnerable adults are safeguarded and protected from harm whilst visiting our exhibitions. In addition to the measures that the Trust has put in place, we ask that teachers and group leaders exercise their own responsibilities in relation to their groups.

Responsibility for a child ultimately lies with the parent or where the parent is not present, whoever is responsible for that child. This is usually a teacher, social worker, carer or guardian, whichever applies. Responsibility for a vulnerable adult ultimately lies with the person undertaking regulated activity relating to that individual.

Children aged 16 and under must be accompanied at all organised events by a responsible adult; at school visits the teacher is in *loco parentis*. These adults are responsible for always supervising the children in their care.

In particular, all group leaders and teachers must:

- ensure that they supervise the children and vulnerable adults in their care at all times;
- in case of an accident or lost child, they should contact a member of staff
- not verbally or physically abuse a child or vulnerable adult;
- observe fire evacuation procedures.

Teachers and group leaders are reminded that the children and vulnerable adults in their care remain their responsibility throughout a visit to an exhibition.

We recommend the following minimum ratio of adults to students:

- 5 -6-year-olds = 1 adult to every 5 children
- 7 – 16-year-olds = 1 adult to every 12 children
- 16 – 18-year-olds = 1 adult to every 15 children

Appendix 6- Use of Image (Photograph/Video) Consent Form

The Mercantile Marine Memorial Trust wants to recognise the achievements and successes of the organisation. One of the ways we do this is to publish photographs and details of our achievements in our publicity material and press releases, including on our website.

To safeguard everyone, we feel this form of publicity must be carefully monitored to ensure that it is consistent with our Safeguarding Policy and Procedures and Data Protection legislation.

For this reason, we have put the following guidelines into place:

- Photographs and videos will only be taken with the permission of the subject(s).
- All photographs and videos will maintain the dignity of the person/people in them.

I have read the conditions and confirm:

- I have authority to give consent on behalf of those named below.
- I give consent for those named below to be photographed and/or filmed.
- If there is any change to my decision I will inform the Trust.

Name of the person giving consent:

Signature of the person giving consent:

Relationship to the person being photographed and/or filmed:

Date: