



Safeguarding Policy and Procedures

Revised June 2016

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Safeguarding Policy and Procedures

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1. INTRODUCTION

This policy has been adopted by the Nerve Centre, Derry / Londonderry and its Belfast Creative Learning Centre, Nerve Belfast. It is also applicable to all other projects and organisations that are operating under the umbrella organisation of The Nerve Centre.

Children, young people and adults at risk, young people and adult at risk have the right to live their lives to the fullest potential, to be protected, to be able to participate in and enjoy activities and to be treated with dignity and respect. There is a considerable body of legislation, government guidance and standards designed to ensure that these groups are protected from harm. Everybody has a responsibility for the safety of children, young people and adults at risk in accordance with relevant legislation, **The Nerve Centre** as an organisation which has significant contacts with children, young people and adults at risk and adult at risk across its various programmes and activities, has both a moral and legal obligation to ensure a duty of care.

The purpose of this policy and its associated procedures is to help protect the children, young people and adults at risk, young people and adults who use our programmes and facilities and to ensure that **Nerve Centre** staff, and the Board of directors, are aware of issues that can cause children, young people and adults at risk harm, and take effective action to protect them. By complying fully with the policies and procedures, **The Nerve Centre** seeks to ensure that staff, and elected members are also protected whilst carrying out their duties.

2.0 POLICY STATEMENT, AIMS AND OBJECTIVES

2.1 Aims

Every child has a right to feel safe and protected and as a provider of cultural and educational programmes and facilities, **The Nerve Centre** is committed to creating and maintaining the safest possible environment for the children, young people and adults at risk who use our facilities and come into contact with members of our staff. We will take all reasonable steps to protect children, young people and adults at risk using our programmes and facilities from harm, discrimination or degrading treatment whilst respecting their rights, wishes and feelings.

The Nerve Centre aims to do this by:

- Recognising that all children, young people and adults at risk, have the right to freedom from abuse and protection from harm.
- Putting in place robust recruitment procedures to ensure that those individuals whose behaviour could be a threat to the safety and wellbeing of children, young people and adults at risk are not offered employment.
- Raising the awareness of the duty of care responsibilities throughout our organisation.
- Actively encouraging good practice amongst all staff and board members and promoting wider awareness wherever possible, i.e. partnership organisations and user groups.
- Creating a safe and healthy environment within all our programmes, avoiding situations where abuse or allegations of abuse may occur.
- Listening to, respecting and promoting the rights, wishes and feelings of children, young people and adults at risk and working closely with other agencies.
- Recruiting, training, supervising and supporting staff, who work with children, young people and adults at risk to adopt best practice to safeguard and protect children, young people and adults at risk, from abuse, and themselves against false allegations. Staff who work with children, young people and adults at risk will be subject to the appropriate level of employment checks.
- Responding to any allegations appropriately and implementing the appropriate disciplinary and appeals procedures.
- Requiring staff and elected members to follow the Nerve Centre's Safeguarding Policy and Procedures.
- Having in place Designated Safeguarding Officers who will be trained appropriately to co-ordinate safeguarding issues and give advice.
- Ensuring confidentiality is maintained where appropriate and that access to confidential information is restricted to the appropriate authorities.
- Carrying out a regular audit and review of the effectiveness of our Safeguarding Policy.
- Helping to maintain professionalism and standards of service which are associated with best practice provision.

2.2 Objectives

The Nerve Centre's objectives to achieve these aims are:

- To provide appropriate training for staff.
- To aid staff to respond sensitively and rigorously to anyone who discloses information about abuse, and be confident and able to take appropriate action swiftly, regardless of whom the allegation is about.
- To promote the general welfare and well being of children, young people and adults at risk within **Nerve Centre** programmes and facilities.
- To develop and implement effective procedures for recording and responding to complaints of alleged or suspected child abuse.

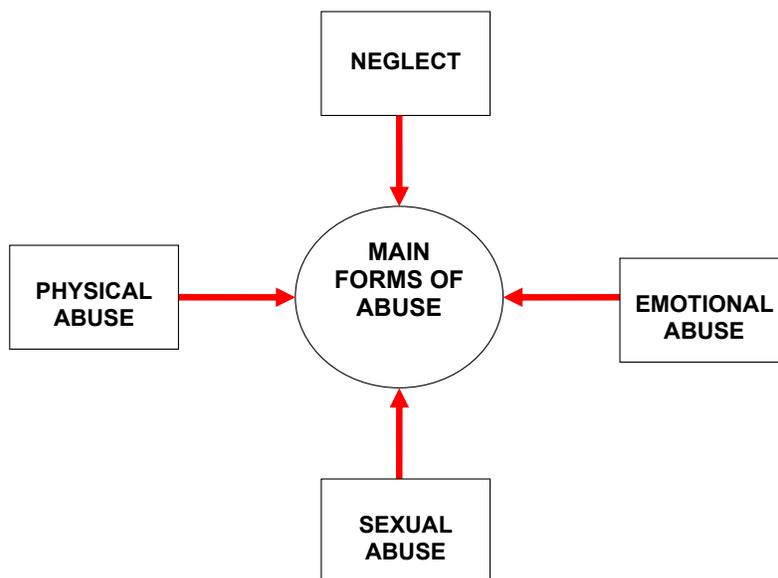
3.0 DEFINITIONS

- The term children, young people and adults at risk or young person is used to refer to anyone under the age of 18 years.
- Adults are anyone aged over 18 and they can be placed in 'vulnerable situations' as opposed to being seen as vulnerable themselves (as defined by the protection of freedom acts 2012).
- The term parent is used as a generic term to represent parents, carers and guardians.
- The term staff and board members are used to refer to employees, company directors, and anyone working on behalf of and/or representing **The Nerve Centre**.

3.1 What is Child Abuse?

A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. It is generally accepted that there are four main categories of abuse which are outlined as follows. These definitions are based on those from Co-operating to Safeguard Children, young people and adults at risk (2003) (Northern Ireland) (Department of Health, Social Services and Public Safety).

MAIN FORMS OF ABUSE



It is accepted that in all forms of abuse there are elements of emotional abuse and that some children, young people and adults at risk are subjected to more than one form of abuse at any one time.

3.1.1 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in significant harm. It may involve a parent or carer failing to provide adequate foods, shelter and clothing, failing to protect a child from physical harm or danger, failing to ensure access to appropriate medical care or treatment, lack of stimulation or lack of supervision.

3.1.2 Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children, young people and adults at risk that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may also involve causing children, young people and adults at risk to frequently feel frightened or in danger, or the exploitation or corruption of children, young people and adults at risk. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone. Domestic violence, adult mental health problems and parental substance misuse may expose children, young people and adults at risk to emotional abuse.

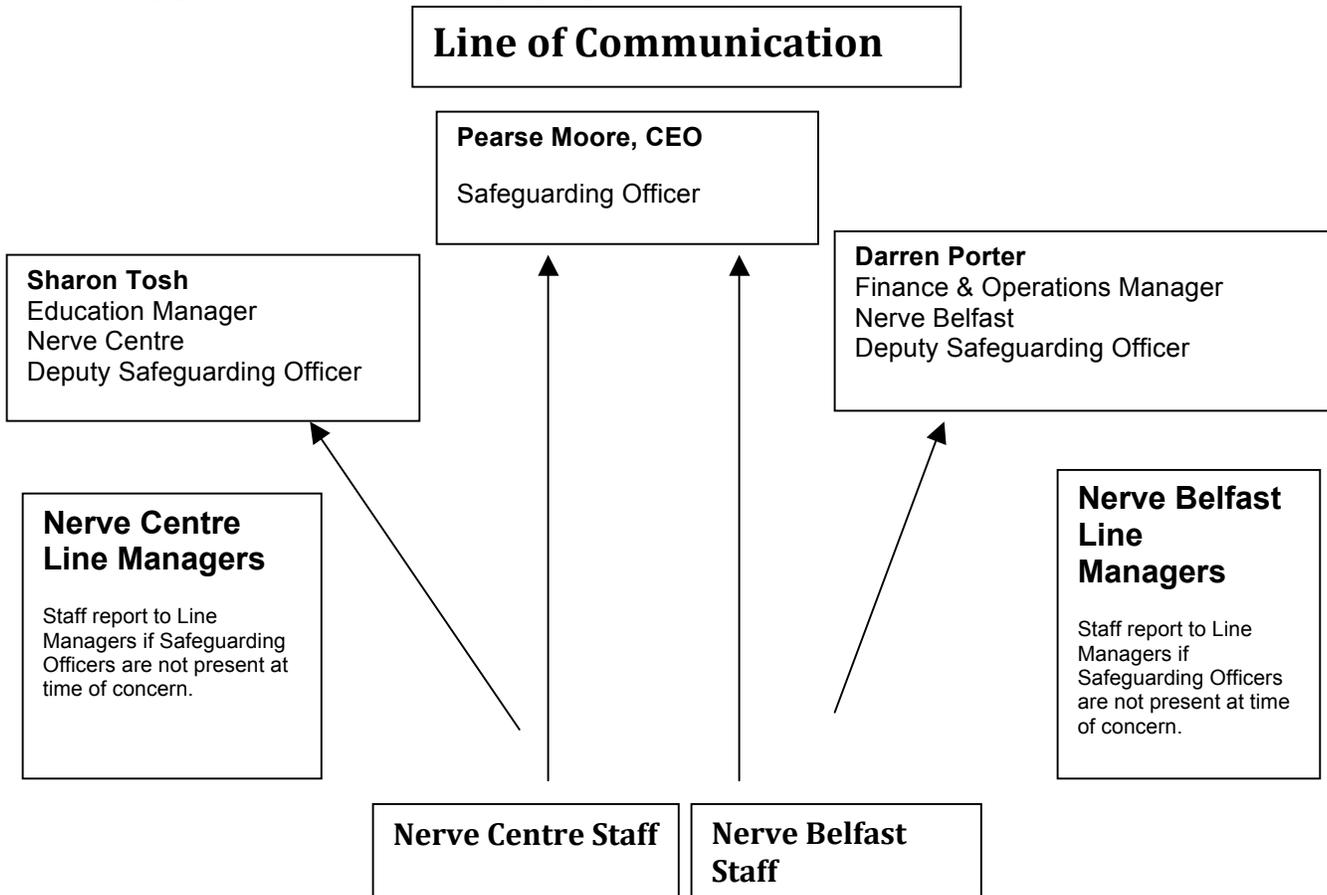
3.1.3 Physical Abuse

Physical abuse is the deliberate physical injury to a child, or the willful or neglectful failure to prevent physical injury or suffering. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, confinement to a room or cot, or inappropriately giving drugs to control behaviour.

3.1.4 Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of, or consents to, what is happening. The activities may involve physical contact, including penetrative or non penetrative acts. They may include activities such as involving children, young people and adults at risk in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children, young people and adults at risk to behave in sexually inappropriate ways.

4. ACCOUNTABILITY AND RESPONSIBILITIES



4.1 Chief Executive

As the Designated Officer, the Chief Executive has ultimate responsibility for ensuring compliance of this policy. Day to day responsibility for implementation is however delegated through the management structure to individual Managers and Officers who are held accountable for ensuring that the requirements set out in this policy are fully implemented.

4.2 The Education Manager

The Education Manager (and the Designated Safeguarding Officers) will ensure that the Safeguarding Policy and Procedures are widely available to all staff. They will also ensure that where identified through job descriptions and representations from individual managers that employment checks are carried out for those members of staff who have a substantial level of contact with children, young people and adults at risk. Safeguarding Officers will also ensure that any records of suspected abuse are stored appropriately.

4.2.1 The Education Manager will have responsibility for ensuring that all staff are made aware of the importance of this policy.

4.2.2 At their Induction training, new employees will be made aware of their role and responsibilities in the area of safeguarding.

4.2.3 The Education Manager has the responsibility to ensure that there are the necessary procedures for the supervision and support of Nerve Centre managers and senior staff in their discharge of this policy.

4.2.4 The Education Manager will ensure as part of the duty of care to all employees, that there are suitable support mechanisms in place for staff who have had any allegations made against them or who are undergoing any investigation under this policy.

4.3 Managers

Managers are expected to ensure employees are aware of this policy; and to notify the Designated Safeguarding Officer(s) in strict confidence regarding any matters of safeguarding brought to their attention. Managers will also be expected to ensure that their staff members who have substantial contact with children, young people and adults at risk attend the relevant training (see section 5).

4.4 Staff

All staff of the Nerve Centre have a duty to adhere to this Policy and procedures and to notify the Designated Officer(s) on any matters of safeguarding. They will also be responsible for undertaking the relevant training should they be working with or have regular contact with children, young people and adults at risk. Attention is drawn to the Code of Conduct contained at Appendix 1 of this policy. It is normal practice for the Nerve Centre to use freelance staff who will also be subject to the requirements outlined within this policy.

4.5 Designated Safeguarding Officers

The Nerve Centre has three designated Safeguarding Officers and their details are:

Pearse Moore	Sharon Tosh	Darren Porter
Chief Executive Officer	Education Manager	Finance & Operations
Mgr		
The Nerve Centre	The Nerve Centre	Nerve Belfast
Tel: 028 71 260562 Ext 227	Tel: 028 71 260562 Ext 213	Tel: 028 90 644333
Mobile: 0779898542	Mobile: 07909690651	Mobile: 07986348546

They will be responsible for acting as a central point and source of advice on safeguarding matters; for coordinating any action necessary within the organization and for liaising with the PSNI, Health and Social Services Trusts and other relevant agencies about suspected or actual cases of child abuse.

The designated Officers will undertake comprehensive training on safeguarding (the Designated Safeguarding Children, young people and adults at risk Officer programme) and will be required to attend any necessary refresher training to update their knowledge and skills on an ongoing basis.

4.5.1 Responsibilities of the Designated Safeguarding Officers

- Gathering information on any reports of safeguarding incidents.
- Acting as an information service to other members of staff on safeguarding issues.
- Keeping only relevant people within the organisation informed about any action taken on safeguarding incidents and any further action required.
- Ensuring the maintenance and safe keeping of individual case records in a confidential manner.
- Establishing a link with a senior member of Social Services staff responsible for safeguarding in Derry and Belfast.
- Ensuring that appropriate information is available to social services/police at the time of referral.
- Promoting the implementation of The Nerve Centre's Safeguarding Policy and procedures among staff.
- Auditing, monitoring and reviewing the Safeguarding Policy and procedures on an annual basis.

5.0 TRAINING OF STAFF

The Nerve Centre will arrange for and provide relevant training in safeguarding for all managers and staff, who have substantial contact with children, young people and adults at risk. The training will be provided at three levels: (According to Job description and role, all staff will be required to attend either)

Level 1. General awareness training for **all** staff. This will also form part of the general induction training for all new employees.

Level 2. Safeguarding Children, young people and adults at risk (and adults in vulnerable situations) training for those with substantial contact with children, young people and adults at risk, young people and Adult at risk and relevant managers.

Level 3. Comprehensive training for Designated Officers, Relevant Managers (Designated Safeguarding Children, young people and adults at risk Officer training) (Training in Safeguarding should be offered on a regular basis providing opportunities for managers and staff to update their knowledge and skill as appropriate. While the Nerve Centre will provide refresher training every 3 years for existing staff, there will be an annual training session to remind staff of reporting procedures).

6.0 CLUBS AND ORGANISATIONS USING NERVE CENTRE FACILITIES

All groups and organisations hiring or using Nerve Centre facilities must have in place an acceptable Safeguarding Policy, particularly those groups and organizations with a substantial child membership, i.e. membership where children, young people and adults at risk represent more than 50% of the overall membership.

As a minimum requirement, all such groups and organizations must complete and sign a Declaration of Safeguarding Form (See Appendix 3) and confirm that they will comply with the Nerve Centre's Policy. Where groups and organizations have booked facilities, The Nerve Centre would encourage these groups to ensure that adequate safeguarding checks have been carried out on those members who will have unavoidable, substantial access to children, young people and adults at risk.

The Declaration Form will be made available to hirers of Nerve Centre facilities with the Terms and Conditions of Hire information. It is the responsibility of the relevant manager to ensure this is completed. Those groups and organizations which do not have a safeguarding policy must comply with the Nerve Centre's Safeguarding Policy and it is the responsibility of the relevant manager to ensure that the group / organisation receives a copy of the document and a signed declaration form with terms and conditions agreed.

All groups, organizations or individual tutors who make use of Nerve Centre facilities must also report any concerns if they encounter a case of alleged or suspected abuse, to the Designated Safeguarding Officers within the Nerve Centre as named below

Pearse Moore
Tel: (028)71 260562
M. 07798938542
E. p.moore@nervecentre.org

Sharon Tosh
Tel: (028)71 260562
M. 07909690651
E. s.tosh@nervecentre.org

Darren Porter (Nerve Belfast)
Tel: (028 90) 644333
M: 07986348546
E. d.porter@nervecentre.org

7.0 IMPLEMENTATION ARRANGEMENTS

RESPONDING TO CONCERNS AND ALLEGATIONS

It is important that all staff members are aware that the first person that has concerns or encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred. However, staff do have a duty of care to the child or young person to report any suspicions they may have.

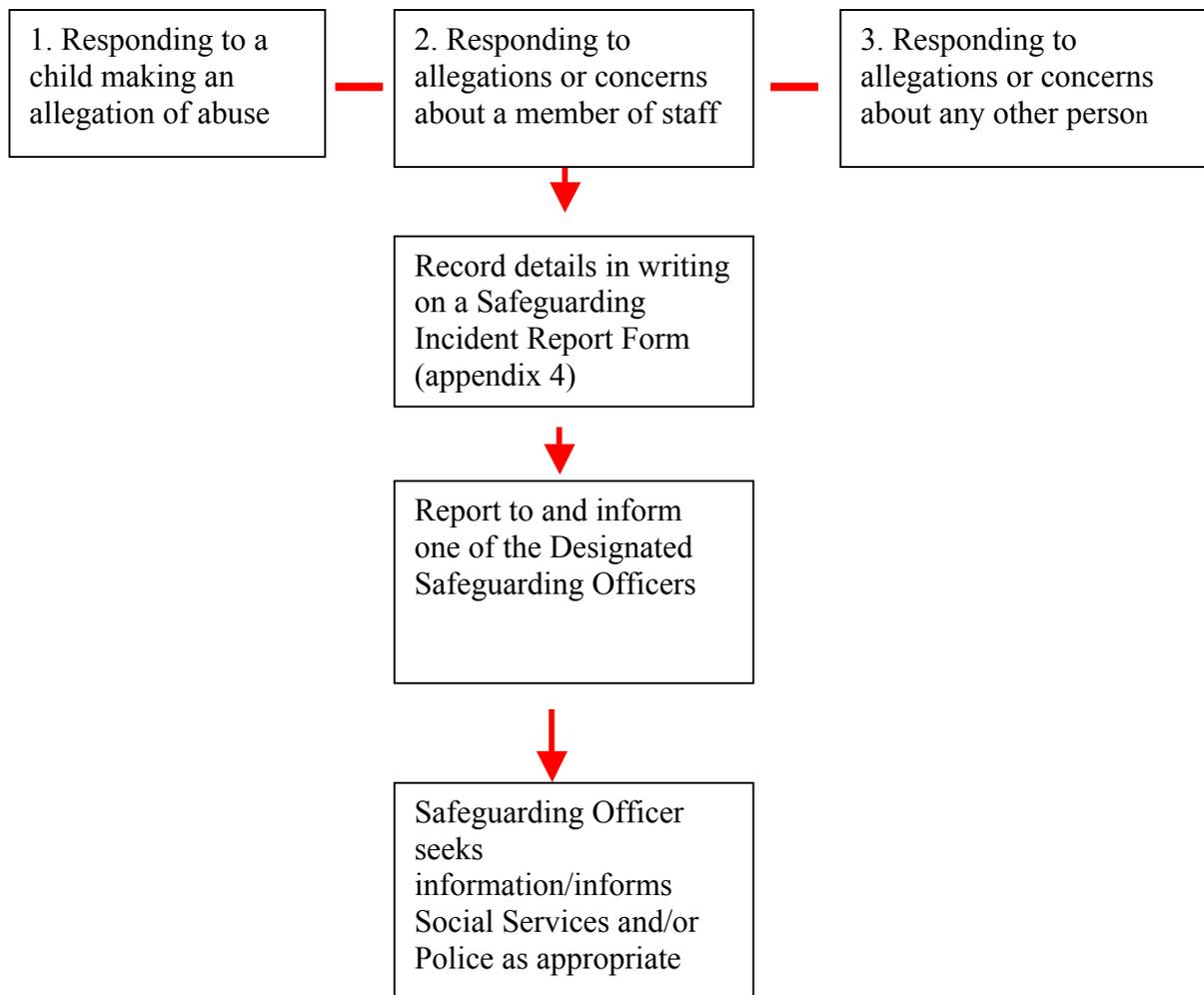
REMEMBER

It is not your job to judge or investigate or to decide that abuse has taken place. It is your responsibility to inform the right people so that the necessary action can be taken to protect children, young people and adults at risk.

In general there are 3 possible situations where staff may need to respond to a concern or case of alleged or suspected abuse:

1. Responding to a child disclosing abuse, i.e. the child makes an allegation of abuse
2. Responding to allegations or concerns about a member of staff
3. Responding to allegations or concerns about any other person, i.e. parent, carer, other service user.

7.1 BASIC RESPONSE PROCEDURES/ACTIONS



7.2 SPECIFIC RESPONSE PROCEDURES

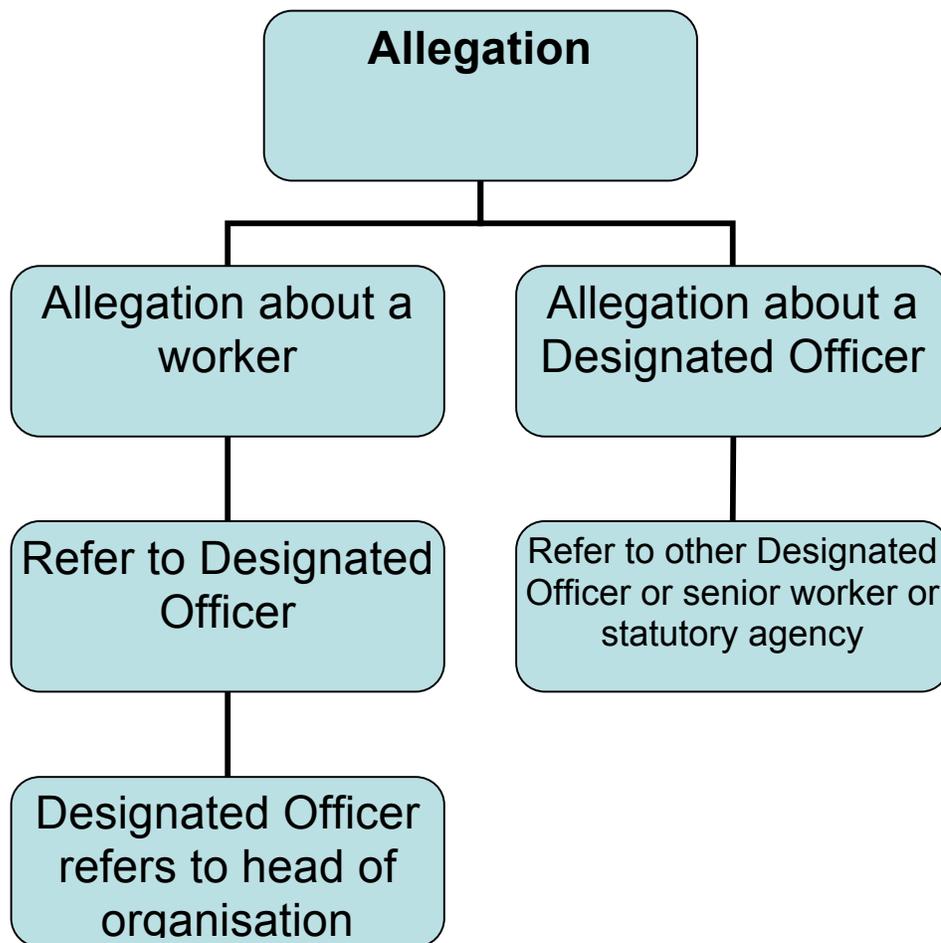
The following procedures should be followed in each situation.

7.21 Responding to a child making an allegation of abuse

- Children, young people and adults at risk who have been or are experiencing abuse rarely talk about this and will only tell people they trust and with whom they feel safe. The following points are a guide to help you respond appropriately.
- Listen carefully to what is said.
- Find an appropriate early opportunity to explain that the information will need to be shared with others – **do not promise to keep secrets.**
- Ask questions for clarification only, and at all times **avoid asking questions** that suggest a particular answer i.e. leading questions
- Reassure the child that he/she has done the right thing in telling you.
- Tell the child what you will do next and with whom the information will be shared.
- Record in writing on a Safeguarding Incident Reporting Form (see Appendix 4) all the details that you are aware of and what was said using the child's own words, as soon as possible.
- Report to your line manager and/or inform the Designated Safeguarding Officer as soon as possible.
- Designated Safeguarding Officer informs relevant persons, i.e. Social Services and/or the Police if appropriate.

7.2.2 Responding to allegations or concerns against a member of staff, board member, or any other person

- Take all allegations or concerns seriously.
- Record in writing on a Safeguarding Incident Report Form (see Appendix 4) all the details that you are aware of as soon as possible.
- Report to and inform the Designated Safeguarding Officer as soon as possible.
- The Designated Safeguarding Officer will inform relevant persons, i.e. Social Services and/or the Police if appropriate.
 - The individual may or may not be advised of the allegations depending on advice from Social Services and/or PSNI.
 - Depending on the allegation, the individual may be asked to stand aside from duties or be temporarily suspended pending the investigation. This is a protection for both child and adult.
 - Report to and inform the Director of the Nerve Centre if the allegation is made against a Designated Officer.



7.3 Procedures for Referrals to Disqualification List

It is illegal for any organisation to employ someone in regulated activity if they are included on the 'Barred List'.

The new Disclosure and Barring Service (established from the Criminal Records Bureau and Independent Safeguarding Authority) will be responsible from December 2012 for maintaining the Barred list in NI. It is their responsibility to decide upon an individual's placement on the Barred list.

Access NI will continue to be responsible for disclosures and will be used to assess every person who works with children, young people and adults at risk or adult at risk. All referrals should currently be made to the ISA and the PSNI should be advised as well.

The Nerve Centre will refer individuals to this list on the following basis:-

- That the Nerve Centre has, on such grounds, suspended the individual or provisionally transferred them to a non-child care position, but has not yet decided

- whether to dismiss them or to confirm the transfer.
- The Nerve Centre has dismissed the individual on the grounds of misconduct (whether or not in the course of their employment) which harmed a child or placed a child at risk of harm
 - The individual has resigned, retired or been made redundant in circumstances such that the Nerve Centre would have dismissed them, or would have considered dismissing them, on such grounds if they had not resigned, retired or been made redundant.
 - The Nerve Centre has, on such grounds, transferred the individual to a position which is not a child care position.
 - Additionally, the Nerve Centre may refer names to the DHSSPS in other circumstances. This would be where they have dismissed an individual, the individual has resigned, retired or has been transferred to a position with the organisation which is not a child care position and where information not available to the Nerve Centre at the time has since become available.

7.4 Confidentiality and Sharing Information

- Every effort should be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know basis only, e.g. Designated Safeguarding Officers, Social Services, Police, child, parents and staff.
- It is extremely important that allegations or concerns are not discussed, as any breach of confidentiality could be damaging to the child, their family and any safeguarding investigations that may follow.
- Informing the parents of a child or young person that there are concerns about needs to be dealt with in a sensitive way and should be done in consultation with Social Services. This will be done in an open and transparent manner.
- Any individual under supervision has the right to be notified about the cause for concern. This will be done in joint consultation with Social Services and the Police. It is important that the timing of this does not prejudice the investigation.
- Recorded information should be stored in a secure place in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).
- If enquiries arise from the public (including parents) or any branch of the media, it is vital that all staff and board members are briefed so that they do not make any comments regarding the situation. **Staff and board members should reply 'no comment' to all questions / enquiries.**
- A Complaints Procedure is available for children, young people and adults at risk, parents and staff. Verbal, written or other accessible format complaints should be made to the Chief Executive, Pearse Moore, and the Nerve Centre's complaints procedure will be activated. (Contact details in Appendix 6)
- A Whistleblowing policy is available (Appendix 7)

8.0 CHANGES FOR 2012

The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 (SVG Order) and equivalent legislation in England, Wales and Scotland had established new safeguarding arrangements across the UK aimed at strengthening protection for children, young people and adults at risk and adult at risk in workplace situations. This has now been amended by the Protection of Freedoms Act 2012 (PoFA) which will enable the implementation of the review for the Vetting and Barring Scheme.

Key features of the new arrangements are:

- The removal of 'Controlled Activity'
- Re-defining and scaling back of 'Regulated Activity'
- Removal of continuous monitoring and registration

In defining a '**Regulated**' position, the following criteria will be used in accordance with Schedule 2 of the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 as amended by The Protection of Freedom Act 2012

For Children, young people and adults at risk

- Unsupervised activities: teaching training, instructing, caring for or supervising children, young people and adults at risk, or providing guidance on well-being, or driving a vehicle only for children, young people and adults at risk. (must be regular)
- Work for a limited range of establishments, with opportunity for contact: eg. Schools, children, young people and adults at risks homes, childcare premises a children, young people and adults at risks hospital but not work by supervised volunteers in those places (must be regular)

Work under (1) or (2) is Regulated Activity only if done regularly. Regular means carried out by the same person frequently (once a week or more often), or on 4 or more days in a 30-day period (or in some cases, overnight).

- Personal care eg. Washing or dressing; or health care by or supervised by a professional
- Registered child-minding and foster care
- Any activity supervised at a reasonable level is no longer considered to be 'Regulated'.
- Regulated activity excludes family arrangements and personal non commercial arrangements

For Adults

- Healthcare: if they are a regulated health care professional or are acting under the direction or supervision of one, for example doctors, nurses, health care assistants and physiotherapists
- Personal care: assistance with washing and dressing, eating, drinking and toileting or teaching someone to do one of these tasks
- Social work: provision by a social care worker of social work which is required in connection with any health services or social services
- Assistance with a person's cash, bills or shopping because of their age, illness or disability
- Assistance with the conduct of an adult's own affairs, for example, enduring powers of attorney, or deputies appointed under the Mental Health Order
- Conveying: conveying adults for reasons of age, illness or disability to, from or between places where they receive healthcare, personal care or social work. This would not include friends or family or taxi drivers

As an organisation the Nerve Centre will be deemed to have broken the law if it knowingly allows a barred person to work in regulated activity

RECRUITMENT

Children, young people and adults at risk are the least able to protect themselves from abuse or exploitation, and the least able to seek help if they are ill treated. It is important, therefore, that all staff working in a 'Regulated' position with children, young people and adults at risk, whether they are full time, part time, freelance, paid or unpaid, have the same recruitment and selection procedures applied to them and that as much information as possible is ascertained as to their suitability for the position. This means choosing people with the necessary skills, knowledge and experience, and ensuring those, whose behaviour could be a threat to the safety and well being of children, young people and adults at risk are screened out. To ensure this the Nerve Centre adheres to the following professional standards.

Under the Nerve Centre's Equal Opportunities Policy, an open recruitment process is applied to both external and 'internal trawl' positions. This process involves the advertisement of a vacancy, completion of an application form, a requirement to attend for test and/or interview, a requirement for written references from two referees and a declaration of accuracy of the information supplied. Following a conditional offer of employment/volunteering appointment, an Access NI check will be requested on the preferred applicant.

Successful candidates must provide proof of identity by presenting either a) Passport b) Birth Certificate c) National Insurance Number and proof of address, eg. recent Utility bill. The Nerve Centre will follow the guidance provided for Access NI on those forms of identification that are suitable.

All job positions will be assessed to ascertain whether the position is a regulated position or not. This will be the responsibility of the relevant manager and where necessary, in consultation with designated safeguarding officers. Where the post is deemed to care for, train, supervise or be in sole charge of children, young people and adults at risk then the recruitment team will insert a reference to the fact that the post is a 'Regulated' position governed by The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007. It will also be stated that before appointing anyone to such a post, it is the Nerve Centre's policy to request the relevant background check with Access NI. If an individual's role is within the definition of regulated activity then we will request not only an enhanced check but also a check with the appropriate barred list (children, young people and adults at risk, adults or both).

The Nerve Centre will only request a check on the **preferred** applicant for a regulated post, that is, an individual to whom a conditional offer of appointment has been made – **not** short listed applicants. The Nerve Centre will seek an Enhanced Access NI check in all cases. Checks will not normally be requested on existing staff however, a check may be requested if:

- An individual takes up new duties in a regulated position with children, young people and adults at risk, where this had not previously been the case
- Serious allegations are made about an individual already working with children, young people and adults at risk or new information comes to light

Where an applicant lives or has lived in another part of the United Kingdom, Republic of Ireland, Jersey, Guernsey or the Isle of Man, the Police Service of Northern Ireland will check for criminal records with the relevant police force. Where we cannot obtain a Access NI check due to the individual living outside these jurisdictions, the applicant will be required to present an original Certificate of Good Conduct or extracts from their criminal records or similar document of their suitability to work with children, young people and adults at risk by the relevant national authority prior to appointment. However, as the level of information disclosed in this way varies from country to country; some provide complete criminal records, others only extracts. We will treat such certificates with caution, if it is difficult to confirm that the information is genuine or complete. In these instances we will personally discuss with the referees the individual's suitability to work with children, young people and adults at risk.

Information provided under The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 (SVG Order) arrangements will be treated as highly sensitive and strictly confidential. Such information will be stored in a locked cupboard or cabinet which will only be accessible by the Nerve Centre's nominated officers. After making a final decision about the applicant, the original information and all copies will be destroyed immediately by shredding. The Nerve Centre will, however, include a note on any personnel file stating that a check was carried out and that the person's conditional offer of appointment was confirmed/withdrawn as a result.

If the Nerve Centre becomes aware that an individual who is employed is disqualified from working with children, young people and adults at risk under The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, then the individual will be transferred to a non -child care position or the employment may be terminated.

No matter how good the recruitment and selection procedures may be, they are not 'foolproof'. Best practice professional standards in management and supervision of staff after appointment is as important.

9.0 PHOTOGRAPHY AND VIDEO POLICY

There is evidence that some people have used children, young people and adults at risk's activities and events, as an opportunity to take inappropriate photographs or video footage of children, young people and adults at risk.

Staff members should be vigilant at all times and any person using cameras or videos at Nerve Centre events or activities which involve children, young people and adults at risk should be approached and asked to complete a Consent form for the use of Cameras and other Image Recorders (see Appendix 5).

When the Nerve Centre commissions professional photographers or invites the press to cover our events and activities you must ensure that the following is adhered to in relation to safeguarding.

- Check credentials of any photographers and organisations used.
- Ensure identification is worn at all times, if they do not have their own – provide it.
- Do not allow unsupervised access to children, young people and adults at risk or young people or one to one photographic sessions.
- Do not allow photographic sessions outside of the activities or services, or at a child or young persons home.
- Parents must be informed that photographs or the recording of images of their child or young person may be taken during Nerve Centre activities or events, and parental consent forms need to be signed agreeing to this. This must include information about how and where these photographs will be used.
- It is recommended that the names of children, young people and adults at risk or young people should not be used in photographs or video footage, unless with the express permission of the child or young person's parent.

10.0 ANONYMOUS COMPLAINTS

Anonymous complaints can be difficult to deal with but should not be ignored. They should be taken seriously and brought to the attention of the Designated Safeguarding Officers who will treat them in accordance with this policy. The information will be checked out and handled in a confidential and appropriate manner.

11.0 COMMUNICATION

The Nerve Centre will promote public awareness of our Child and Adult at risk Protection Policy both within our premises and through our website.

12.0 IMPLEMENTATION PLAN & REVIEW

The following plan outlines the mechanisms that the Nerve Centre will use to ensure that this policy is implemented in an effective, efficient and professional manner.

This policy will be reviewed every three years by the Designated Safeguarding Officers to take account of developments in the area of safeguarding.

The Designated Safeguarding Officers will carry out an annual audit of all facilities to ensure compliance with this policy. Training appropriate to the level of involvement in safeguarding will be arranged by the relevant manager. Prior to any activity involving children, young people and adults at risk, staff will have received the appropriate level of Safeguarding Training.

The Nerve Centre will ensure that Designated Safeguarding Officers have the necessary skills, knowledge and experience to undertake the role.

Designated Safeguarding officers will keep their own knowledge about safeguarding up-to-date in order to support staff.

The Nerve Centre senior management will provide the necessary support, control and guidance on safeguarding issues and ensure the appropriate mechanisms are in place to ensure staff safety.

13.0 DESIGNATED SAFEGUARDING OFFICERS

Any issues or queries relating to this policy should be addressed to:

Pearse Moore
The Nerve Centre
7/8 Magazine Street
Derry, BT48 6HJ
Tel: 028 71 260562
Mob: 07798938542

p.moore@nervecentre.org

Sharon Tosh
The Nerve Centre
7/8 Magazine Street
Derry, BT48 6HJ
Tel: 02871 260562
Mob: 07909690651

s.tosh@nervecentre.org

Darren Porter
Nerve Belfast
Somerset St
Belfast
Tel: 02890 644333
Mob: 07986348546

d.porter@nervecentre.org

NB: In the event of either Designated Safeguarding officer not being available or the issue has taken place outside the hours of 9am to 5pm, staff should refer any concerns they have to their immediate line manager in the first instance. Information and actions taken should be recorded and reported to the Designated Safeguarding Officers as soon as is practicable within one working day.

Staff are also provided with contact details for Social Services and the Police Child Abuse Investigation Units so that they may also be contacted directly if a designated officer is unavailable or the cause for concern requires immediate action.

APPENDICES

Appendix 1 Code of Behaviour for Safeguarding for Employees

Appendix 2 Declaration of Safeguarding Form

Appendix 3 Safeguarding Incident Reporting Form

Appendix 4 Consent Form for the use of Cameras and other Image Recorders

Appendix 5 Useful Contacts

Appendix 6 Complaints Procedure

Appendix 7 Whistleblowing Policy

APPENDIX 1

CODE OF BEHAVIOUR ON SAFEGUARDING FOR EMPLOYEES

The Nerve Centre recognises that it is not practical to provide definitive instruction that would apply to all situations at all times whereby staff come into contact with children, young people and adults at risk and to guarantee the protection of children, young people and adults at risk and staff.

However, it is important for all employees to have clear guidelines as to what is expected of them by the Nerve Centre in their interaction and decision making with children, young people and adults at risk and to understand and implement the standards of behaviour required of them in order to fulfill their roles within the Nerve Centre.

These guidelines would also apply to volunteers should they ever be engaged to work in an unpaid capacity both within and away from Nerve Centre premises.

Underlying principles and philosophy

The Nerve Centre recognises that children, young people and adults at risk should be:

Listened to, taken seriously and have a right to the safe use of Nerve Centre facilities and programmes.

Nerve Centre employees have both a moral and a legal responsibility to protect children, young people and adults at risk through following these procedures and adhering to this policy.

Children, young people and adults at risk have a valuable role to play as users of Nerve Centre programmes and facilities.

The Nerve Centre will promote a culture in the organisation where children, young people and adults at risk's participation is both encouraged and promoted.

Some points of guidance

- Employees should not spend excessive amounts of time alone with children, young people and adults at risk away from others. Any contact with an individual child should take place as openly as possible. If privacy is needed for any reason, doors should be left open and other employees informed where possible.
- Employees are advised not to make unnecessary or inappropriate physical contact with children, young people and adults at risk. There may be occasions when physical contact is unavoidable such as providing comfort and reassurance to distressed children, young people and adults at risk or physical support in learning instruments. In all cases physical contact should only take place with the consent of the child or the young person and information provided to parents/ carers about the likelihood of physical contact and the context for this.

- Where it is necessary and unavoidable to take children, young people and adults at risk alone in a vehicle on journeys this should be with the full consent of the parents and a more senior member of management. Every effort should be made to provide parents and carers with contact telephone number of the staff, ensure the child can talk with parents (and vice versa) if required and provide an estimated length of journey time. The staff member should not travel alone with the child it would be best practice to have two adults to travel .
- Employees must not meet with children, young people and adults at risk outside of the Nerve Centre without the consent or knowledge of parents and line managers.

EMPLOYEES SHOULD NEVER:

- Engage in sexually provocative or rough physical games including horse play.
- Allow children, young people and adults at risk to use inappropriate language or behaviour unchallenged
- Make sexually suggestive comments about, or to a child, even in fun.
- Let allegations a child makes go without being recorded and reported to the Safeguarding Officer.
- Do things of a personal nature for children, young people and adults at risk that they can do themselves.
- Take a child to the toilet unless another adult is present or has been made aware (this may include a parent, group leader).

Anti-bullying

The Nerve Centre is committed to providing a caring, friendly and safe environment. Bullying is unacceptable and children, young people and adults at risk are encouraged to tell a leader about any incidents so these can be dealt with promptly and effectively. Bullying is defined as the use of aggression with the intention of hurting another person, resulting in pain and distress to the victim and which will negatively impact on their wellbeing. In many instances, there are three parties involved – the bully, the victim and the onlooker.

Bullying can be categorised as:

Emotional	Being unfriendly, excluding, tormenting (e.g. hiding possessions, threatening gestures).
Physical	Pushing, kicking, hitting, punching or any use of violence against another person.
Racist	Racial taunts, graffiti, gestures.
Disability	Gestures, taunts and exclusion on the grounds of disability.
Gender	Unfriendliness and exclusion.
Sexual	Unwanted physical contact or sexually abusive comments.

Homophobic	Because of, or focusing on, the issues of sexuality.
Verbal	Name-calling, sarcasm, spreading rumours, teasing.
Cyber	Internet, e-mail and internet chat room misuse; mobile phone threats by text messaging, Bluetooth and phone calls; misuse of associated technology i.e. camera and video facilities.

Every child has the right to be treated with respect - no one deserves to be a victim of bullying and children, young people and adults at risk who are bullying others need to learn different ways of behaving. Bullying of any kind should not be tolerated.

- report incidents of bullying to the Designated Officer without delay.
- the leader should make a record of the report.
- an investigation into the bullying behaviour/threats should be undertaken and the bullying quickly stopped.
- an attempt should be made to help the bully/bullies change their behaviour.
- in serious cases, parents/guardians should be informed and asked to attend a meeting to discuss the problem.
- If necessary, the PSNI may be consulted.

Some possible outcomes are:

- to ask the bully/bullies to make a genuine apology.
- to reconcile the children, young people and adults at risk, if possible.
- in serious cases, to consider suspension or exclusion.
- after the bullying has been investigated and dealt with, the situation should be monitored to ensure a repeat incident does not take place.

Implications for Employees

Employees who breach any of the above may be subject to the Nerve Centre's disciplinary procedures. If an allegation against an employee has occurred then an investigation will be carried out in accordance with the procedure for dealing with allegations. The investigating officer will be required to liaise with the Designated Safeguarding Officer to clarify if she/he has any relevant records or any other safeguarding information in relation to the individual.

Further Information

Should employees require further information, please contact your line manager or the Designated Safeguarding Officers.

Pearse Moore Tel: 028 71 260562 ext 227 M. 07798938542
Sharon Tosh Tel: 028 71 260562 Ext 213 M. 07909690651
Darren Porter (Studio On), Tel: 02890 449821 M.07986348546

CODE OF BEHAVIOUR FOR SPECIFIC ARTFORMS

Music

In relation to safeguarding in Music, examples of good practice considerations might include:

The teaching of specific musical instruments will involve at all times the physical touch of children, young people and adults at risk/people to ensure they are following the teacher's directions.

- Good practice would highlight the importance of ensuring that children, young people and adults at risk are informed that touch may be involved. As much as possible, teachers should attempt to demonstrate techniques and encourage students to copy these without the need for any actual physical interference by the teacher.
- When teaching drums or guitar, it may be necessary to stand behind the person and lean over them. This can be very threatening and good practice would highlight the importance of a child's comfort with this and if any discomfort/hesitation is shown, then it must not occur.
- When teaching singing, physical touch may involve the touching of the diaphragm to enhance/demonstrate breathing techniques. This needs to be carried out firstly with permission and secondly as lightly and sensitively as possible.

Digital Photography/Film/Stop Motion Animation

Examples of good practice considerations in relation to these areas might include:

- Use of all types of camera must be well supervised and guided by trainers, with clear role allocation and purpose outlined.
- Children, young people and adults at risk should not be given the opportunity to use a digital stills or DV camera in an unsupervised environment.
- Use of mobile phones in general should be prohibited during programme sessions, but this should also apply to using mobile phones for taking photos and video footage.
 - All tapes should be collected, clearly labelled (including name of group/school and date/time of usage) and inventoried by trainers.
 - Footage should always be watched through thoroughly from beginning to end before digitisation or deletion. All tapes must be safely stored or deleted/disposed of after usage.
 - Trainers should never be left alone with a child, young person or vulnerable adult in a darkroom or editing suite situation.
 - In the event that editing training is only being undertaken by one or two of the participating children, young people and adults at risk/young people, the door must remain open and the receiving school/organisation's adult supervisor must be present alongside the Nerve Centre trainer/s at all times.

Multi-Media Animation & Internet

When exploring the creation of digital visual imagery and animation, it is important for trainers to consider the following:

- It is recognized that many young people will use drawing to show how they are feeling, and may draw images of abuse situations and experiences. Trainers must be aware of this and respond appropriately.
- Accessing the Internet can of course provide a breadth and depth of creative opportunities for children, young people and adults at risk and adult at risk; however this needs to be monitored to ensure its safe use.
- It is important that key IT protocols are agreed at all stages of the centre's programme planning and delivery which ensure:
 - Provision of a suitable safeguarding block on computers used by young people who are participating on The Nerve Centre programmes.
 - Provision of protected and tailored user access to the network on site.
 - Appropriate levels and quality of supervision of young people's internet usage during programme sessions.
 - Levels of taste, decency and appropriateness of internet and other audio-visual stimulus material selected by The Nerve Centre staff/trainers for viewing by children, young people and adults at risk, young people and adult at risk taking part on programmes.

Audio Visual Material

Through work with a wide variety of digital media, many audio-visual representations are created by and of children, young people and adults at risk participating on the Nerve Centre programmes. Staff and trainers must follow correct procedures in relation to the storage and use of this audio-visual material.

It is important to understand the motivation of a person who is involved in the sexual exploitation of children, young people and adults at risk, young people and adult at risk and that for them even the most innocent of photographs, images or film can provide them with sexual stimulation.

No images of or produced by a young person may be used in any form or for any purpose in The Nerve Centre or by The Nerve Centre staff without the written permission of the young person's parent/legal guardian.

Consent for any kind of showcasing of such material also needs to be given by the consenting parent / carer / guardian. Good practice will also ensure that those adults signing a consent form are aware of all the visual mediums that their child or young person's image may be displayed on and permission sought for their consent in this way. Neither individual nor groups of children, young people and adults at risk or young people should be photographed or/and filmed without parental permission.

When permission has been received, images may only be used for display, showcasing and publicity purposes. Signed consent forms must be kept on file and be made available for inspection upon request.

Any consented photographs for inclusion in press releases or the Nerve Centre website must not name the children, young people and adults at risk or young people shown. All photographs should be securely stored after usage.

Appendix 2

DECLARATION OF SAFEGUARDING FORM

Groups & Organisations

“The Nerve Centre is committed to creating and maintaining the safest possible environment for the children, young people and adults at risk who use its facilities.

Groups & Organisations Using Nerve Centre facilities

All groups or organisations which have substantial child membership and who are seeking to use any Nerve Centre facilities must be able to demonstrate that they have are committed to the principles of safeguarding.

Completion of the following information is therefore required before any such group or organisation will be granted authorisation to use Nerve Centre facilities.

APPENDIX 2 (cont)

Declaration of Safeguarding Form

Name of Club/ Organisation: _____

Address & Contact Tel Number of Chairperson or Secretary:

I, the above named employee can confirm the following information is correct in respect of the above club / organisation **(Please circle as appropriate)**:

ESSENTIAL		
1. The group / organisation has a safeguarding policy in place (if so please attach a copy) Where a policy is not in place they are willing to adopt the Nerve Centre's policy. A copy of this Safeguarding Policy will be provided for them.	Yes	No
2. At no time will any adult be left alone with any child/ children, young people and adults at risk during activities	Yes	No
3. All incidents of reported or suspected abuse, no matter how trivial, will be reported to the Designated Safeguarding Officer, line manager or other appropriate authority as appropriate	Yes	No
4. Persons using facilities on behalf of this organisation/ group will, at all times, follow all guidelines as laid down in the Nerve Centre's Safeguarding Policy	Yes	No
DESIRABLE		
1. All adults involved in supervising children, young people and adults at risk within the group / organisation have been subjected to adequate safeguarding checks	Yes	No

Signed: _____

Print Name: _____

Position in organisation/ group: _____

Date: _____

APPENDIX 3
SAFE GUARDING INCIDENT REPORT FORM
 All information will be treated in strict confidence

1. DETAILS OF THE CHILD	
Name Of Child:	
Date Of Birth:	Age in years
Address:	
Postcode:	
Telephone Number:	Name of Parent/Guardian
Capacity in which the child is known to you:	
2. DETAILS OF THE ALLEGED INCIDENT	
Date & time of alleged Incident:	
Location address where alleged incident took place:	
Are you reporting your own concerns or passing on those of someone else? Give details including names & contact details:	
Brief description of what has prompted the concerns, include date, time etc of any specific incident:	
Are there any signs of abuse? E.g. the 4 main forms of abuse Physical Abuse, Sexual Abuse, Emotional Abuse, Neglect Give details.	

Record what was said by both the child and by yourself. (Remember, do not lead the child – record the actual details, do not summarise. Record where possible in the child’s own words)

Has the alleged abuser/s been identified? If so give details

3. ACTIONS TAKEN

Have you spoken to the parent(s), guardians? If so, what was said?

Have you consulted anybody? Give details:

Your name:	Position and contact number:
To whom reported	Date of reporting
Signature	Date

This form should now be given to a Designated Safeguarding Officer by hand in a sealed envelope marked confidential.

APPENDIX 4

CONSENT FORM FOR THE USE OF CAMERAS AND OTHER IMAGE RECORDERS (for use of Photographs, Film or Video Recordings of Children, young people and adults at risk, Young People or Adult at risk)

PERMISSION TO TAKE PHOTOGRAPHS OR RECORD IMAGES

There is evidence that some people have used children, young people and adults at risk's activities and events, as an opportunity to take inappropriate photographs or video footage. In order to protect children, young people and adults at risk from such abuses the Nerve Centre's policy is that:

"Photography and the recording of images of any kind are allowed only with the written permission of the management of the premises".

The procedure for obtaining permission is to complete the form below and forward to the relevant Manager prior to taking photographs or recording any images.

Details of Person Requesting Permission

Name: _____

Address: _____

Telephone No:

Name of the Subject:

Relationship of Photographer and Subject:

Reason for Photography:

How do you intend to use the images?

Declaration

I _____ hereby declare that the information provided is valid and that the images will only be used for the reasons given.

I also understand and agree that if anyone has any complaints or expresses concern about my use of photographic or recording equipment I will respect the rights of other people and stop when requested.

SIGNED: _____ DATE: _____

APPENDIX 5

Useful Contacts

NSPCC Safeguarding Helpline 24 hours	0808 800 5000
Police Service of Northern Ireland	
Child Abuse Investigation Units	
Derry/Londonderry	02871 861355
A District (North and West Belfast)	028 9070 0604
B District (South and East Belfast)	028 9025 9832
C District (Castlereagh, Carryduff, Dundonald)	028 9056 1767
D District (Lisburn, Antrim, Newtownabbey, Carrickfergus)	028 9448 2633

Health and Social Services Trusts – Gateway Teams

Belfast Trust 028 9050 7000

Northern Trust 030 0123 4333

North 028 7032 5462

Central 028 7965 1020

South eastern 028 9334 0165

Southern Trust 0800 783 7745

Craigavon 028 3834 3011

Dungannon 028 8771 3506

Newry 028 3082 5000

Central 028 3741 5285

South-Eastern Trust 0300 1000 300

Lisburn 028 9060 2705

North Down 028 9181 8518

Down 028 4461 3511

Western Trust 028 7134 5171

Enniskillen 028 6634 4103

Omagh 028 6634 4103

L'Derry 028 7131 4090

Out of Hours Emergency Social Work Service

Belfast Trust 028 9056 5444

Northern Trust 028 9446 8833

Southern Trust 028 3833 4444

South Eastern Trust 028 9056 5444

Western Trust 028 7134 5171

Appendix 6 - Procedure to make a complaint

Who can complain

The following people can use an official complaints procedure to complain about safeguarding procedures:

- the child, if they have enough understanding
- the parent of, or anyone with parental responsibility for, the child
- anyone else who has sufficient interest in the welfare of the child.

Should you have any query or complaint regarding safeguarding you should raise the matter initially with your direct contact at the Nerve Centre.

On all occasions the member of staff contacted will report the complaint to the Chief Executive. The initial contact will aim to resolve any complaint or query at this point.

However, if you fail to get a satisfactory reply, or do not receive a reply within 5 working days, you may then raise the matter in writing with the Chief Executive, who will arrange a meeting as soon as possible.

You may, if so desired, be accompanied at this meeting.

If you fail to get satisfactory reply, or do not receive a reply from the Chief Executive within 5 working days, you may then raise the matter in writing with the Board of Directors, who will arrange a meeting as soon as possible.

You may, if so desired, be accompanied at this meeting.

The decision of the Board of Directors shall be given to you in writing as soon as possible and not later than 5 working days from the complaint being heard.

Reference to the Board of Directors shall be the final stage of the complaint's procedure and their decision is final.

Any issues or queries relating to this policy should be addressed to:

Pearse Moore
The Nerve Centre
7/8 Magazine Street
Derry, BT48 6HJ
Tel: 028 71 260562
Mob: 07798938542
p.moore@nervecentre.org

Appendix 7

The Nerve Centre Whistleblowing Policy

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2.0 Policy Statement	3
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4.0 Responsibilities	5

Whistleblowing Arrangements

1.0 Background

- 1.1 “Whistleblowing” although not legally defined, is the term currently used to describe instances of public disclosure of activities by an organization, or individuals in organisations, which are believed to be irregular in a way and to an extent which merits this being brought to public knowledge in the interests of the common good. It is recognized that organisations which exist for the public good are in receipt of public money should have policies which signify the legitimacy of whistleblowing and specify the protection of the whistleblower, truly so called, from dismissal, victimization or any other form of harassment.
- 1.2 The Guide for Members of the Governing Bodies of Universities and Colleges in England, Wales and Northern Ireland, issued by the Committee of University Chairpersons (CUC), says the following by way of guidance in relation to whistleblowing and its legitimacy:

“From time to time a situation may arise where a member of staff has serious concerns about perceived irregularities in the running of the institution or the activities of colleagues within the institution. Such concerns might relate to, for example, financial malpractice, the abrogation of appropriate procedures, or departures from statutory or other requirements for good governance. All institutions should have appropriate channels through which staff can make such allegations (referred to as “whistleblowing”). Provided that the allegation is made lawfully, without malice and in the public interest, the position within the institution should not be jeopardized.”

- 1.3 The Public Interest Disclosure (NI) Order 1998 gives employees the right of complaint to an Industrial Tribunal if they report wrongdoing and as a result suffer any form of detriment. Whilst this legislation does not require employers to have specific arrangements in place for whistleblowing, best practice would suggest that an organization should communicate to staff that they should report concerns and that such reports will be taken seriously.

2.0 Policy Statement

- 2.1 The Nerve Centre aims to foster a culture of openness about the activities, management and governance of The Nerve Centre, and also a culture of propriety in the actions and behaviours of all staff in the Nerve Centre.

- 2.2 The Nerve Centre recognizes that individual students, or members of staff, have a right, and may on occasion have a duty, to express concern about what are genuinely believed to be malpractices or irregularities within the Nerve Centre. These could be financial malpractices or irregularities, or breaches of health and safety policy or legislation, or policies/practices which are believed to be unethical or in breach or, for example, equality legislation. Further examples of such concerns are detailed at Appendix 2.
- 2.3 The Nerve Centre fully endorses the legitimacy of whistleblowing and will work to ensure that best practice is reflected in NC procedures and systems in relation to whistleblowing.
- 2.4 The NC recognizes that effective whistleblowing arrangements underpin the risk management and internal control processes and can provide valuable information that can be utilized to identify a potential problem and, deal with it before it causes significant damage to the NC's reputation or to those associated with the NC.
- 2.5 The NC undertakes, that students or staff who raise legitimate concerns based on appropriate and reasonable evidence will not be subject to any victimization or other unfair treatment as a result of them raising a genuinely held concern. Action by a member or staff to deter a student or another member of staff from raising a concern about a possible irregularity or other malpractice may be considered as a disciplinary offence, and appropriate action taken under the disciplinary procedure.
- 2.6 The NC, on the other hand, will not tolerate unfounded allegations made frivolously or with malicious intent, and in this eventuality will take appropriate action through its disciplinary procedures for students and staff or through legal avenues.

3.0 Procedures and Arrangements

- 3.1 To support the commitment to openness, good governance and prosperity, the NC has documented arrangements for whistleblowing, which will be made available to all staff and students. These arrangements, detailed at Appendix 1, will
 - Provide certain assurances on confidentiality and safety
 - Outline how to raise a whistleblowing concern internally at various levels
 - Give a commitment to investigate and feedback
 - Provide details of independent advisors
 - Provide information on external disclosures
- 3.2 The arrangements advise that concerns should be raised with immediate managers, orally or in writing. If this is not considered appropriate, concerns can be raised with a number of named senior

managers in the NC. If the matter is considered very serious or channels have been exhausted, then concern may be raised with the Director or Chair of the NC Board of Governors.

- 3.3 All concerns that have become formal allegations will be investigated appropriately and expeditiously. Allegations made will be subject of a preliminary investigation. Allegations of financial irregularity will normally be investigated by the NCs Internal Auditors; investigations of other allegations will normally be conducted by a person or body nominated by the person to whom the allegation is made. Investigation should not be carried out by anyone who will be required to make or be part of a final decision on the matter or by a person who may have a conflict of interest. If the preliminary investigation finds that there is substance to the allegation, the matter may be considered under the appropriate stage of the relevant disciplinary procedure and may be the subject of a formal investigation and/or may be referred to the police in appropriate circumstance.
- 3.4 If an allegation concerns the work or activities of an individual, normally he/she must be told of the allegation and of the evidence supporting it and be allowed to comment before the preliminary investigation is concluded and a report made.
- 3.5 The NC policy on whistleblowing supplements but does not replace its policies in relation to complaints, grievance, discipline and harassment. The NC encourages students and other client to bring complaints to its attention, and undertakes to deal with these promptly and fairly. As well, there is a grievance procedure which staff can activate in appropriate circumstances related to their employment; harassment procedures with staff trained to deal with these situations. This whistleblowing policy supplements these other policies by providing an additional avenue for raising concerns that may be genuinely held about the NC, its activities or its staff where interests or others or the NC itself are genuinely at risk.

4.0 Responsibilities

- 4.1 The audit committee of the Board of Directors shall be responsible for ensuring that proper procedures are in place to ensure compliance with legislation and best practice in relation to whistleblowing issues.
- 4.2 All Managers are required to deal seriously and sensitively with concerns raised under whistleblowing arrangements.
- 4.3 NC Management will ensure that whistleblowing arrangements are communicated to staff, students and the Board of Directors.
- 4.4 All staff have specific responsibilities under arrangements for the protection of children, young people and adults at risk/young people

and vulnerable adults to report and notify in accordance with the provision of NC policies.

APPROVED BY:

Signed: _____

Date _____
(Chief Executive)

Signed: _____

Date _____
(Chairman)

Whistleblowing Arrangements

Introduction

All of us at one time or another may have concerns about what is happening at work. However, when it is about unlawful conduct, a possible fraud or a danger to the public or the environment or other serious malpractice, it can be difficult to know what to do.

You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it is none of your business or that it is only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the NC. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The purpose of these arrangements is to reassure you that it is safe and acceptable to speak up. They also enable you to raise your concern about such malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.

If something is troubling you of which you think we should about or look into, please let us know. If, however, you wish to make a complaint about your employment or how you have been treated, please use the NC Grievance Procedure. If the issue relates to a normal operational matter, which is not contentious, the NC has a General Complaints Policy which may be an appropriate means of dealing with the issue.

We have implemented these whistleblowing arrangements for you to raise any concern where the interests of others or the organization itself are at risk.

If your concern is about possible fraud, you may also wish to refer to our Fraud Policy Statement.

If in doubt, raise it!

Our Assurances to you

Your safety

We are committed to making whistleblowing work. If you raise a genuine concern under these arrangements, you will not be at risk of losing your job or suffering any form of retribution as a result. Provided you are acting in good faith, it does not matter if you are mistaken. Of course, this assurance does not extend to someone who maliciously raises a matter they know to be untrue.

Confidentiality

We will not tolerate the harassment or victimization of anyone who raises a genuine concern and with these assurances, we hope you will raise your concern openly. However, we recognize that there may be circumstances when you would prefer to

speak to someone in confidence first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

Anonymity

Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter, to protect your position, or to give you feedback. Accordingly, while we will consider anonymous reports, these arrangements are not well suited to deal with concerns raised anonymously. The provisions of policy for protection of children, young people and adults at risk/young people and vulnerable adults require all allegations of misconduct to be investigated. If you are unsure about raising a concern you can get independent advice from Public Concern as Work.

How to raise a concern internally

Please remember that you do not need to have firm evidence of malpractice before raising a concern. However we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Step One

If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager or with their immediate manager. This can be done orally or in writing.

Step Two

If, for whatever reason, you feel that raising it with your line manager or their immediate manager is not appropriate or it has not worked, please raise the matter with the Board of Directors. If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

Step Three

If these channels have been followed and you believe there is an ongoing risk, or you feel the matter is so serious that you cannot discuss it with any of the above, you can raise your concern directly with:

Chief Executive (Pearse Moore)

Or

Chair of Board (John McGowan)

How we will handle the matter

If you feel that a conflict of interest may arise, (ie: your concern relates to the Chief Executive or Chair of Board) you may also raise your concern Education Officer, Mrs Sharon Tosh.

Once you have told us of your concern, we will look into it to assess initially what action should be taken. This may involve an informal review, an internal inquiry or a more formal investigation. Where it is decided that a formal investigation is necessary the overall responsibility for the investigation will lie with a nominated “investigation officer.” In any event, we will tell you who is dealing with the matter, how you can contact him or her, and whether your further assistance may be needed. If you request, we will write to you summarizing your concern and setting out how we propose to handle it.

When you raise a concern you may be asked how you think the matter might best be resolved. If you do have any personal interest in the matter, we do ask that you tell us at the outset. If your concern falls more properly within the Grievance Procedure we will tell you.

We will give you as much feedback as we properly can, and if requested, we will confirm it in writing. However, we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.

Independent advice

If you are unsure whether or how to raise a concern or you want confidential advice at any stage, you may contact the independent charity Public Concern at Work on 02074046609 or by email at helpline@pcaw.co.uk. Their lawyers can talk you through your options and help you raise a concern about malpractice at work. For more information, you can visit their website at www.pcaw.co.uk

External disclosures

While we hope we have given you the reassurance you need to raise your concern internally with us, we recognize that there may be circumstances where you can properly report a concern to an outside body. In fact, we would rather you raise a matter with the appropriate regulator – such as the Northern Ireland Audit Office or the Health and Safety Executive or Northern Ireland – than not at all. Public Concern at Work will be able to advise you on such an option and on the circumstances in which you may be able to contact and outside body safely.

Conclusion: While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using these whistleblowing arrangements you will help us to achi