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**INSTITUTE FOR SMALL BUSINESS AND ENTREPRENEURSHIP (ISBE)**

**SAFEGUARDING POLICY STATEMENT**

Developed by: Rob Edwards, Leigh Sear

Developed: October 2018

Updated:

Version: 1.0

ISBE’s current Safeguarding Trustee is Leigh Sear (leigh.sear@sfedi.co.uk)

**1. Scope**

1.1 ISBE is committed to safeguarding the welfare of any adults, children and young people who come into contact with the services we provide. All ISBE trustees, management team and any sub-contractors have a responsibility to be mindful of the potential for abuse, and to refer suspected cases to a designated trustee with specific safeguarding responsibilities (‘the Safeguarding Trustee’) within the Institute.

1.2 The protection of adults, children and young people is set out in a range of legislation including; the Safeguarding Vulnerable Groups Act 2006, Protection of Vulnerable Groups (Scotland) Act 2007, Protection of Freedom Act 2012, Children Act 1989 amended 2004, Protection of Children (Scotland) Act 2003, Human rights Act 1998, the Disability Discrimination Act 1995, etc.

1.3 This Policy, and related guidance, applies to all ISBE trustees and management team, working with individuals who fall within the safeguarding definitions below. This policy will be reviewed annually or following significant changes in legislation/best practice. Where appropriate, other organisations who provide a service on behalf of ISBE are required to have their own Safeguarding Policies which fulfil the needs of the legislation and to ensure that their employees and any sub-contractors employed by them follow their policy.

**2. Roles and Responsibilities**

2.1 Accountability for ensuring that ISBE fulfils its safeguarding responsibilities falls to the President of the Institute. However, the day-to-day responsibility for the management of the policy is delegated to the Safeguarding Trustee and the ISBE management team.

2.2 All ISBE trustees and management team have a responsibility for ensuring that the activities they are involved in during their work are carried out in accordance with this policy. The ISBE management team is responsible for ensuring that this policy is followed by any subcontractors that might be engaged by the Institute.

**3. Definitions**

**3.1 Definition of 'Safeguarding Adults, Children and Young People'**

3.1.1 The Association of Directors of Social Services, National Framework of Standards (2005) argues against the use of the word 'vulnerable' and in line with this the term 'Vulnerable Adults' is replaced within this policy with the term 'Safeguarding Adults'.

3.1.2 A 'Safeguarding Adult' 'is a person aged 18 years or over who may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself or herself, or unable to protect him or herself against significant harm or exploitation' (No Secrets, DH/Home Office 2000). The Safeguarding Vulnerable Groups Act (2006) uses the term 'safeguarding adult' in a much wider context to apply to people using certain types of services or residing (even temporarily) in certain types of places. The term ‘children and young people’ is used to refer to anyone under the age of 18 years (Children Act 1989).

3.1.3 The definition of a 'safeguarded person' is anyone who ISBE suspects to have suffered 'abuse' (as defined below) and is vulnerable, and this will be reported to the appropriate authority.

### 3.2 Definition of 'Abuse'

3.2.1 'Abuse is any act or failure to act which results in a significant breach of a vulnerable person’s human rights, civil liberties, bodily integrity, dignity or general wellbeing, whether intended or inadvertent, including sexual relationships or financial transactions to which a person has not or cannot validly consent or which are deliberately exploitative' (**The Council of Europe, 2002).**

**3.3 Definition of 'Harm'**

3.3.1 'Harm is to be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical) but also the impairment of or an avoidable deterioration in physical or mental health and the impairment of physical, intellectual, emotional, social or behavioural development' (N**o Secrets, DH/Home Office 2000)** based on the Children Act (2004) definition of 'significant harm'. Self-harm is only a safeguarding issue where the intention to self-harm is as a result of abuse and the individual falls within the definition of requiring to be safeguarded.

**4. Reporting Procedure**

4.1 When there are concerns or where a disclosure or allegation is made, individual employees are not responsible for deciding whether or not abuse has occurred; nor are they responsible for conducting an investigation (this is the role of the local authorities). However, ISBE trustees and management team are responsible for reporting concerns to the Safeguarding Trustee within ISBE following the reporting procedures set out below:

**Stage One:**

4.2 An ISBE trustee or management team member becomes concerned that, or an individual discloses that, abuse may be taking place. *Where the information is disclosed, the ISBE stakeholder should listen without leading or investigating. Do not promise to keep secrets.*

**Stage Two:**

4.3 Notify the Safeguarding Trustee within ISBE immediately and decide if there is sufficient information to support the likelihood that abuse may be taking place. The Safeguarding Trustee can then discuss with the ISBE management team in the first instance, if appropriate. If the suspected abuse involves a member of staff, the President of ISBE should be consulted during the stage two discussions.

4.4 If it is felt that the individual is in imminent danger or a criminal act has taken place, contact the police/ambulance by dialling 999. This should be undertaken immediately. All contact should be made by the Safeguarding Trustee or a member of the ISBE management team, who is then also responsible for completing any subsequent external and internal reports. Once the emergency services arrive, it should be confirmed that they will be responsible for reporting the incident to the appropriate safeguarding authority. The Safeguarding Trustee or member of the ISBE management team should now complete stage three of the policy.

4.5 If the individual is not in imminent danger or a criminal act has not taken place, the incident should be reported to the local authority’s Safeguarding Team (or in Scotland, the local Adult Support and Protection Unit) in the case of adults. In the case of an incident involving a child or young person, the local social services should be contacted by the ISBE representative. This should be undertaken within 24 hours. If the ISBE representative made the report by telephone, a written record of the date and time the report (including the name and position of the person to whom the matter was reported) should be made. In all cases it must be confirmed in writing to the relevant local authority social services department within 24 hours. If sent by email, a received and read report should be requested.

**Stage Three**

4.6 The Safeguarding Trustee or member of the ISBE management team should also complete a Safeguarding Incident Form within 24 hours. This form should be emailed to the President of ISBE who will action/disseminate any learning outcomes as appropriate with the Executive Board in the first instance.

4.7 Where a concern or allegation has been raised, a Safeguarding log should be marked as follows:

* SGA (Safeguarding Actioned) where an allegation was action by reporting it to an external authority.
* SGN (Safeguarding Noted) where an allegation is not reported to an external authority, we want to note this allegation for future reference.

**5. Data Protection**

5.1 Where possible, consent should be obtained from the individual or their guardian before sharing personal information with third parties. However, in some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the individual is the priority. The protection of the individual must take priority, if you believe abuse is taking place, it is your duty to report it.

5.2 The Safeguarding Incident Form should be used when reporting the incident internally. At no time should the individual/s involved be identified by name, a reference number is to be used throughout the report in order to protect their identity.

**6. Review Process**

6.1 Where appropriate, the ISBE Board Meeting will review reports received and any trends/issues highlighted. This meeting will also provide an opportunity to identify if any changes are required to the Safeguarding Policy and/or further guidance is needed to ensure compliance with the legislation.

**7. Training**

7.1 All ISBE trustees and members of the ISBE management team will be provided with a copy of this policy and asked to provide confirmation that they have read and understood the policy.

7.2 Where appropriate, trustees may receive training which will allow them to:

* Understand the principles and values underpinning safeguarding
* Recognise an adult/child vulnerable to abuse
* Recognise evidence and indicators of abuse
* Recognise risk factors which may increase the level of abuse
* Understand and apply this policy and the reporting procedures.

7.3 This training will be sourced from an appropriate external provider.

**8. Provision of Information**

8.1 ISBE’s safeguarding policy, documentation and guidance documents are available to all trustees and management team via the shared ISBE Dropbox.

Approved by: Gideon Maas, President, ISBE

Date: October 2018