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Registered Charity (No. 1125503) Company No. 6629551

# SAFEGUARDING / CHILD PROTECTION POLICY & PROCEDURES FOR THE ZONE YOUTH CLUB, LEEDS

**Reviewed August 2023** 

Next Review Date: August 2024

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**Last Review Date: August 2023** 

#### INTRODUCTION

The whole aim of an organisation having policies and procedures in place is to demonstrate the organisation's values and commitment in a particular area and provide guidance for staff / volunteers / children / parents / carers about what to do in specific circumstances.

Within the area of child protection it is vital that all staff and volunteers know what to do if they are concerned about a child. It is equally important that parents / carers and young people themselves are aware that the organisation takes the safety and welfare of children / young people into consideration in every activity that is undertaken.

Children up to age 18 are included under child protection. Vulnerable children and adults can include people with a learning difficulty such as Downs Syndrome, Autism and physical disabilities as well as frail older people.

It is advised that all organisations that work with or provide services for Children and Young People have a copy of 'What to Do If You Are Worried A Child Is Being Abused (2015)'. This booklet contains specific information that can be used within your organisation and it is strongly recommended that all staff have access to and have read this document. Copies are available for download here

# THE ZONE YOUTH CLUB – LEEDS

The Zone is fully committed to safeguarding and promoting the welfare of all children and young people. It recognises its responsibility to take all reasonable steps to promote safe practice and to protect children from harm, abuse and exploitation. The Zone Youth Club acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

Paid staff and volunteers will endeavour to work together to encourage the development of an ethos, which embraces difference and diversity and respects the rights of children, young people and adults.

# In implementing this child protection policy The Zone will:

- Ensure that all workers understand their legal and moral responsibility to protect children and young people from harm, abuse and exploitation;
- Ensure that all workers understand their responsibility to work to the standards that are detailed in the organisation's Child Protection Procedures and work at all times towards maintaining high standards of practice;
- Ensure that all workers are aware of **L**eeds **S**afeguarding **C**hildren **B**oard interagency safeguarding procedures and are confident in how to work within these guidelines.
- Ensure that all workers understand their duty to report concerns that arise about a child or young person, or a worker's conduct towards a child / young person, to the organisation's named person for child protection;
- Ensure that the named person understands his / her responsibility to refer any child protection concerns to the statutory child protection agencies (i.e. Police and / or Children and Young People's Social Care);
- Ensure that any procedures relating to the conduct of workers are implemented in a consistent and equitable manner;
- Provide opportunities for all workers to develop their skills and knowledge, particularly in relation to the welfare and protection of children and young people;
- Ensure that children and young people are enabled to express their ideas and views on a wide range of issues and will have access to the organisation's Complaints Procedure;
- Ensure that parents / carers are encouraged to be involved in the work of the organisation and have access to all guidelines and procedures;
- Keep up to date with national developments relating to the welfare and protection of children and young people.

#### CHILD PROTECTION POLICY STATEMENT

The Zone believes that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people.

# We recognise that:

- The welfare of the child / young person is paramount
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

#### The purpose of the policy:

- To provide protection for the children and young people who use The Zone's services, including the children of adult members or users.
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm.

This policy applies to all staff, including senior managers and the board of trustees, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of The Zone.

# We will seek to safeguard children and young people by:

- Valuing them, listening to and respecting them
- Adopting child protection guidelines through procedures and a code of conduct for staff and volunteers
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Sharing information about child protection and good practice with children, parents, staff and volunteers
- Sharing information about concerns with agencies who need to know, and involving parents and children appropriately
- Providing effective management for staff and volunteers through supervision, support and training.

We are also committed to reviewing our policy and good practice annually.

Signed:	
Position	1:
Date:	

#### Section 1 - Child Protection Guidelines And Procedures

The Zone is a youth centre providing activities and programmes for young people of nursery age to post university young adults.

The Zone is committed to the welfare and protection of all children and young people partaking in Zone activities.

The purpose of our child protection policy is to ensure that all concerns about the care and protection of children / young people are effectively managed.

These procedures have been designed to ensure the welfare and protection of any child and / or young person who access the services provided by The Zone. The procedures recognise that child protection can be an emotive subject and understand that some workers may find it a challenging area. However, it is important that staff and volunteers respond appropriately to a child protection incident and are aware of their responsibilities. The Zone is committed to the belief that protecting children and young people is everybody's responsibility and that these guidelines will enable all workers and volunteers to act appropriately to any concerns that arise in respect of a child / young person.

# **Staff Code Of Conduct**

All staff (paid and voluntary) are expected to adhere to a code of conduct regarding contact with members and their families / carers. Children will be treated with respect and dignity. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued or where it becomes necessary to physically restrain a member for their own or others' safety, this will be appropriately recorded and reported to senior staff and parents.

Wherever possible, First Aid should only be administered by qualified first aiders. If it is necessary for the child to remove clothing for this treatment, there should wherever possible be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot.

If a male member of staff is providing any form of intimate care, a female colleague will be present. All first aid treatment and non-routine changing or personal care will be recorded. A list of first-aiders should be made available in The Zone office.

For their own safety and protection, staff should exercise caution in situations where they are alone with members. The door to the room in which the counselling or meeting is taking place should be left open. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting.

Zone staff should also be alert to the possible risks, which might arise from contact with members outside of the centre. Home visits to members should only take place with the knowledge and approval of management. Visits / telephone calls by members to the homes of staff members should only occur in exceptional circumstances and with the knowledge and approval of senior staff / management in order that they may activate appropriate procedures.

# Section 2- Children's Act: Law and Policy

There are several laws and government policies, which contribute to safeguarding children and policy. These are:

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Education Act 2002 - this sets out duties and responsibilities for schools in safeguarding children.

<u>Statutory guidance on FGM</u>, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

<u>The Children and Families Act 2014</u> - this act came into force on April 2014. It seeks to improve services for vulnerable children and support strong families. It underpins wider reforms to ensure that all children and young people can succeed, no matter what their background.

<u>Working Together to Safeguard Children (WTTSC 2018)</u> - We comply with this guidance and the procedures set out by our Local Safeguarding Children partnership.

Statutory <u>Guidance on the Prevent duty</u>, which explains duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

# Section 3 - Recognising The Signs And Symptoms Of Abuse

As defined by Working Together to Safeguard Children (WTTSC 2018)

**Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Examples which may indicate neglect (it is not designed to be used as a checklist):

- Hunger
- Tiredness or listlessness
- · Child dirty or unkempt
- Poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Untreated illnesses/injuries
- Pallid complexion
- Stealing or scavenging compulsively

- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Neurotic behaviour

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

Examples which may indicate physical abuse (not to be used as a checklist):

- Patterns of bruising; inconsistent account of how bruising or injuries occurred
- Finger, hand or nail marks, black eyes
- Bite marks
- Round burn marks, burns and scalds
- Lacerations, wealds
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- · Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Examples which may indicate sexual abuse (it is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate.
- Thrush, Persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant

- Regressive behaviour, Enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches in genital area

**Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child in participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment

Examples which may indicate emotional abuse (it is not designed to be used as a checklist):

- Over-reaction to mistakes, continual self-deprecation
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- · Fear of parents being contacted
- Running away / Going missing
- Compulsive stealing
- Masturbation, Appetite disorders anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

N.B.: Some situations where children stop communication suddenly (known as "traumatic mutism") may indicate maltreatment.

# **Child Sexual Exploitation:**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Reference: Child Sexual Exploitation. Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (DfE 2017)

#### **Disabled Children**

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's finances
- Invasive procedures

# **Responses From Parents**

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- An unexpected delay in seeking treatment that is obviously needed
- An unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home
- · Violence between adults in the household

## Children with additional needs:

The Zone recognises that while all children have a right to be safe, some children may be more vulnerable to abuse e.g. those with a disability or special educational need, those living with domestic violence or drug / alcohol abusing parents, etc.

When The Zone is considering excluding, either fixed term or permanently, a vulnerable pupil and / or a pupil who is either subject to a S47 Child Protection plan or there are / have previously been child protection concerns, we will undertake an informed (multi-agency where other professionals are involved) risk-assessment prior to making the decision to exclude. In the event of a one-off

serious incident resulting in an immediate decision to permanently exclude, the risk assessment must be completed prior to convening a meeting of the Charity Trustees.

# **Children in Specific Circumstances**

The Zone follows the Leeds LSCP (www.leedsLSCP.org.uk) online multi-agency procedures and will, where necessary, have due regard to the government guidance for children in specific circumstances.

# **Female Genital Mutilation: The Mandatory Reporting Duty**

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

If The Zone discovers that an act of FGM appears to have been carried out on a child under 18 must immediately (in consultation with the DSL) report this to the police, personally. This is a statutory duty.

The duty above does not apply in cases where a child is at risk of FGM or FGM is suspected but is not known to have been carried out. **Staff should not examine pupils**.

Any member of staff who suspects a pupil is at risk of FGM must speak to the DSL and follow our local safeguarding children's partnership procedures.

# Peer on peer abuse

We recognise that children are capable of abusing their peers and that peer on peer abuse can manifest in many different ways, including on-line bullying, youth produced imagery (sexting), criminal and sexual exploitation, initiation/hazing and inappropriate/harmful sexualised behaviours. It is very clear that this abuse should always be treated seriously, and never just as banter or part of growing up.

Any concerns around peer on peer abuse must be reported and recorded in line with the child protection procedures outlined in this policy. The DSL is responsible on responding to such concerns in keeping with LSCP protocols. The DSL is responsible for providing support to any victims, and the perpetrators.

Where children and young people have exhibited inappropriate / harmful sexualised behaviour and / or exhibited inappropriate / harmful sexualised behaviours towards others, an AIM (Assessment, Intervention, Moving On) checklist must be completed and contact made with Children's Social Work Service.

There should be a co-ordinated multi-agency approach through a risk assessment management plan (RAMP) to respond to their needs which will include parent/carers, youth justice (where appropriate), children's social work service and health.

We will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

Where child sexual exploitation, or the risk of it, is suspected, frontline practitioners should complete a cause for concern form and pass onto the designated member of staff for child protection.

If the child /young person already has an allocated social worker, the DSL must contact them (or their team manager) to discuss any concerns about sexual exploitation.

A copy of the CSE checklist tool for partners can be obtained from the LSCP Website: CSE Checklist Tool for Partner Agencies

We will ensure The Zone works in partnership with parents / carers and other agencies as appropriate.

#### Radicalisation

Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups.

# Responding to concerns about radicalisation

If staff are concerned about a change in the behaviour of an individual or see something that concerns them (this could be a colleague too) they should seek advice appropriately with the DSL who should contact the Prevent Education Officer—Julia Holden, 07891 273720 for further advice.

Organisations working with children and young people are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. The Prevent team can advise and identify local referral pathways.

Effective early help relies on all staff to be vigilant and aware of the nature of the risk for children and young people, and what support may be available. The Zone will ensure that as far as possible all front line staff will undertake Prevent awareness training (e.g. Workshop to Raise Awareness of Prevent [WRAP]).

# **Our Role In Supporting Children**

We will offer appropriate support to individual children who have experienced abuse or who have abused others.

In cases where children have experienced abuse / abused others, the DSL should ensure that appropriate support is offered. An individual support plan will be devised, implemented and reviewed regularly should the child (victim, perpetrator, of other child affected) require additional pastoral support / intervention. This plan will detail areas of support, who will be involved (i.e.

learning mentor, key worker) and the child's wishes and feelings. A copy of the individual support plan will be kept in child's child protection record.

# Section 4 - Named Person(s) For Child Protection

Every organisation that works with children or young people should have in place a Designated Safeguarding Lead(s) for dealing with child protection issues that may arise. A deputy must be made available in their absence. These individuals must be trained in child protection and their responsibilities clearly stated within your procedures.

The Zone has an appointed individual who is responsible for dealing with any child protection concerns. In their absence, a deputy will always be available for workers to consult with. The named persons for Child Protection within The Zone are:

**Child Protection Officer:** Stanley Cundle

Work telephone number: 0113 217 2531 Mobile number: 07958 290 538

**Deputies:** Raina Sheaf (Zone CEO & Designated Safeguarding Lead)

Work telephone number: 0113 217 2531 Mobile number: 07946 869 664

Simon Harris (Zone Centre Director & Designated Safeguarding Lead)

Work telephone number: 0113 217 2531 Mobile number: 07807 229 701

Out Of Hours Emergency Contact For The Zone: 07936 362 908

The role and responsibilities of the named person(s) are:

- To ensure that all staff are aware of what they should do and who they should go to if they are concerned that a child / young person may be subject to abuse or neglect.
- Ensure that any concerns about a child / young person are acted on, clearly recorded, referred on where necessary and, followed up to ensure the issues are addressed.
- The Named Person(s) will record any reported incidents in relation to a child / young person or breach of Child Protection policies and procedures. This will be kept in a secure place and its contents will be confidential.

#### Section 5 - What To Do If You Are Worried About A Child

The Zone recognises that it has a duty to act on reports or suspicions of a child at risk and believes that the safety of the child should override any doubts, hesitations, or other considerations (such as the potential to have a negative impact on professional relationships with a family). When worrying changes are observed in a child's or young person's behaviour, physical condition or appearance, staff will:

- Initially find a quiet place to talk to the child / young person about what you are observing.
- o It is okay to ask questions, for example: "I've noticed that you don't appear yourself today, is everything okay?" But never use leading questions.
- Listen carefully to what the young person has to say and take it seriously.
- Never promise to keep a secret. Always explain to the child / young person that any information they give will have to be shared with others if it indicates that they, and / or other children, are at risk of harm.

# Stages Of Action To Follow If A Child Makes A Disclosure

The actions that a member of staff should take can be divided into three stages:

- **Stage 1:** Dealing with the disclosure as it happens; ensuring that the child's immediate needs are met and that they feel supported.
- **Stage 2:** Ensuring that the designated member of staff is immediately informed.
- **Stage 3:** Ensuring that details are recorded as soon as possible; that they feel satisfied that the disclosure has been followed up and is acted upon appropriately.

# Stage 1

When a disclosure is made to a member of staff it is most important that they understand that they do not have to investigate the disclosure themselves. The disclosure must always be taken seriously and dealt with according to procedures even if the truth of the disclosure is uncertain.

#### The member of staff should:

- Listen to the child / young person, keeping calm and offering reassurance.
- Observe visible bruises and marks but not ask a child to remove or adjust their clothing to observe them.
- Allow the child to lead the discussion and to talk freely if a disclosure is made.
- Listen to the child without investigating.
- Avoid using questions such as 'Is there anything else you'd like to tell me?'
- Accept what the child / young person says without challenge.
- Reassure them that they are doing the right thing in telling and that they recognise how hard it is for them to tell.

#### They should not:

- Press for details by asking questions such as 'What did they do next?'
- Lay blame or criticise either the child or the perpetrator.
- Ask the child to repeat what they said to a colleague.
- Promise confidentiality but they should explain that the child has done the right thing and who will need to be told and why.

# Stage 2

As soon as possible, once the immediate comfort and safety of the child is secured, the member of staff should inform the **D**esignated **S**afeguarding **L**ead (DSL) of the disclosure. If the DSL is not available then their deputy or the most senior member of staff available should be informed.

The designated person(s) will take immediate action if there is a suspicion that a child has been abused or likely to be abused. In this situation the DSL will contact the police and / or Social Care.

NB: Parents / carers will need to be informed about any referral to Children & Young people's Social Care unless informing the parent / carer would place the child at an increased risk of harm.

# Stage 3

The member of staff receiving the disclosure should note down details as soon as possible. What is clearly etched at the time can become blurred after a few hours. Staff should understand that it is vital that they make clear and concise notes soon after the disclosure in order to complete a more detailed record and incident sheet later. Immediate notes should include:

- date and time
- place and context of disclosure or concern
- important facts provided, e.g. names mentioned.

Wherever possible, staff should record information as it was told to them using the language of the child rather than their own interpretation of it.

In the case of bruises or observed injuries a body map (a drawing of a body outline, upon which the location of bruises/injuries can be indicated) might be completed. Any records should be copied to the designated person and will be used by them during the referral process.

It is important that staff are instructed to report factual information rather than assumption or interpretation. They might convey their intuitive thoughts but these should be recognised as such and should not form part of the record.

#### **Contact Numbers:**

**Childrens Social Work Services (CSWS) & Advice Team – for professionals**: 0113 376 0336 between 9.00am to 5.00pm.

Out Of Hours, **Children's Emergency Duty Team** (EDT) on 0113 5350600. If you believe a child is in immediate danger and at risk of harm call the **Police** on 999.

CSWS - For Public: 0113 222 3301

The Local Authority Designated Officers in Leeds can be contacted Monday to Friday on: 0113 3789687

You can also seek advice and clarity about a situation that is beginning to raise concern through the **NSPCC** on 0808 800 5000.

# Section 6 - Managing Allegations Made Against A Member Of Staff Or Volunteer

The Zone will ensure that any allegations made against members or a member of staff will be dealt with swiftly and in accordance with these procedures:

- Senior staff / management must ensure that that the child is safe and away from the person against whom the allegation is made.
- The named person for child protection should be informed immediately. In the case of an allegation
  involving the named person, alternative arrangements should be sought to ensure that the matter
  is dealt with by an independent person. (Note: this could be a committee member, director or
  anyone within the organisation that is in a senior position and believed to be independent of the
  allegations being made).
- The named person should contact The Local Authority Designated Officers in Leeds can be contacted Monday to Friday on: 0113 3789687 for advice on how to proceed with the immediate situation.
- Out of office hours (evenings, weekends and bank holidays) call the Children's Emergency Duty
  Team (EDT) on 0113 5350600. If you believe a child is in immediate danger and at risk of harm call
  the police on 999.
- The individual who first received / witnessed the concern should make a full written record of what was seen, heard and / or told as soon as possible after observing the incident / receiving the report. It is important that the report is an accurate description. The named person (if appropriate) can support the worker during this process but must not complete the report for the worker. This report must be made available on request from either the police or Children's Social Work Services (CSWS).

Regardless of whether a Police and / or Children's Social Work Services (CSWS) investigation follows, The Zone will ensure that an internal investigation takes place and consideration is given to the operation of disciplinary procedures. This may involve an immediate suspension and / or ultimate dismissal dependant on the nature of the incident.

# <u>Section 7 – Management and Supervision Of Staff / Volunteers</u>

The Zone is committed to the appropriate management and supervision of staff and / or volunteers working with children and or young people to ensure that appropriate lines of accountability are in place with respect to work with children and young people.

- Staff will receive regular supervision meetings in line with the organisation's supervision policy. These will be recorded and the notes agreed by both parties.
- When a member of staff is involved in a child protection incident this will be reviewed within supervision i.e. recordings, assessments, monitoring arrangements etc and decisions relating to the level of involvement will be taken by the appropriate officer / member within the organisation.
- When a member of staff is a member of a child protection core group, working with a child who is subject to a child protection plan, supervision will occur at a minimum of monthly intervals and discussion of the case will be a standing agenda item.

• Supervisors will ensure that information about children is appropriately shared with other organisations and that they will be informed if work ceases with a child when other organisations are involved.

# **Section 8 - Interagency Information Sharing**

The Zone adheres to the Leeds Interagency Sharing Protocol.

A copy of this document can be found in **Appendix 1**.

# **Section 9 - Safer Recruitment**

The Zone is committed to safeguarding the welfare of children and young people. Safer recruitment practice includes verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews, references and enhanced DBS checks.

Raina Sheaf and Simon Harris have attended Safe Recruitment Workshops delivered by Leeds Safeguarding Children Partnership.

# **Section 10 - Recording and Managing Confidential Information**

In The Zone, staff and managers can be said to have a 'confidential relationship' with families.

It is our intention to respect the privacy of children and their parents and carers, while ensuring that they access high quality services for children / young people.

We aim to ensure that all parents and carers can share their information in the confidence that it will only be used to enhance the welfare of their children.

There are record keeping systems in place that meet legal requirements; means of storing and sharing that information take place within the framework of the Data Protection Act and the Human Rights Act.

- For a summary of the organisation's commitment to manage confidential information safely, please see our policy in **Appendix 3** (Confidentiality & Information Sharing)
- For how information is stored and, the circumstances under which information needs to be shared see **Appendix 4** (Privacy Policy)

# Section 11 - Disseminating / Reviewing Policies and Procedures

Zone staff will highlight any concerns about specific children / young people and report these to senior staff / management. Where necessary, the information will be passed on to the child protection officer for further investigation.

Child protection policies will be reviewed annually by management and the child protection officer and amended / updated accordingly and signed by the charity chairman and nominated child protection officer(s). Should legislation change before the scheduled review, the policy will be updated accordingly.

All changes / amendments will be clarified and shared with staff and will be displayed in the child protection policy for public viewing by carers, parents and young people within the reception area of the building and on the organisation's website.

Signed	Chairman
Signed	Child Protection Officer



# Information sharing

Advice for practitioners providing safeguarding services to children, young people, parents and carers

**July 2018** 

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# **Summary**

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

# About this government advice

This HM Government advice is non-statutory, and has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

This guidance does not deal in detail with arrangements for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance.

This guidance has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018, and it supersedes the HM Government *Information sharing: guidance for practitioners and managers* published in March 2015.

# Who is this advice for?

This advice is for all frontline practitioners and senior managers working with children, young people, parents and carers who have to make decisions about sharing personal information on a case-by-case basis. It might also be helpful for practitioners working with adults who are responsible for children who may be in need.

# The seven golden rules to sharing information

- 1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
- 2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- 3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- 4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
- 5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- 6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and upto-date, is shared in a timely fashion, and is shared securely (see principles).
- 7. Keep a record of your decision and the reasons for it whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

# The General Data Protection Regulation (GDPR) and Data Protection Act 2018

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 introduce new elements to the data protection regime, superseding the Data Protection Act 1998. Practitioners must have due regard to the relevant data protection principles which allow them to share personal information,

The GDPR and Data Protection Act 2018 place greater significance on organisations being transparent and accountable in relation to their use of data. All organisations handling personal data need to have comprehensive and proportionate arrangements for collecting, storing, and sharing information.

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

To effectively share information:

- all practitioners should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered 'special category personal data' meaning it is sensitive and personal
- where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent
- information can be shared legally without consent, if a practitioner is unable
  to, cannot be reasonably expected to gain consent from the individual, or if to
  gain consent could place a child at risk.
- relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

# **Sharing Information**

Sharing information is an intrinsic part of any frontline practitioners' job when working with children and young people. The decisions about how much information to share, with whom and when, can have a profound impact on individuals' lives. Information sharing helps to ensure that an individual receives the right services at the right time and prevents a need from becoming more acute and difficult to meet.

Poor or non-existent information sharing is a factor repeatedly identified as an issue in Serious Case Reviews (SCRs) carried out following the death of or serious injury to, a child. In some situations, sharing information can be the difference between life and death.

Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Every practitioner must take responsibility for sharing the information they hold, and cannot assume that someone else will pass on information, which may be critical to keeping a child safe.

Professor Munro's review of child protection concluded the need to move towards a child protection system with less central prescription and interference, where we place greater trust in, and responsibility on, skilled practitioners at the frontline. Those skilled practitioners are in the best position to use their professional judgement about when to share information with colleagues working within the same organisation, as well as with those working within other organisations, in order to provide effective early help, to promote their welfare, and to keep children safe from harm.

Lord Laming emphasised that the safety and welfare of children is of paramount importance and highlighted the importance of practitioners feeling confident about when and how information can be legally shared.<sup>2</sup> He recommended that all staff in every service, from frontline practitioners to managers in statutory services and the voluntary sector should understand the circumstances in which they may lawfully share information, and that it is in the public interest to prioritise the safety and welfare of children.

# Being alert to signs of abuse and neglect and taking action

All practitioners should be alert to the signs and triggers of child abuse and neglect.<sup>3</sup> Abuse (emotional, physical and sexual) and neglect can present in many different forms. Indicators of abuse and neglect may be difficult to spot. Children may disclose abuse, in

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<sup>&</sup>lt;sup>1</sup> The Munro review of child protection: final report – a child centred system

<sup>&</sup>lt;sup>2</sup> The Protection of Children in England: a progress plan

<sup>&</sup>lt;sup>3</sup> What to do if you're worried a child is being abused

which case the decision to share information is clear, as actions must be taken to respond to the disclosure. In other cases, for example, neglect, the indicators may be more subtle and appear over time. In these cases, decisions about what information to share, and when, will be more difficult to judge. Everyone should be aware of the potential for children to be sexually exploited for money, power, or status, and individuals should adopt an open and inquiring mind to what could be underlying reasons for behaviour changes in children of all ages.

If a practitioner has concerns about a child's safety or welfare, they should share the information with the local authority children's social care, NSPCC and/or the police, in line with local procedures. Security of information sharing must always be considered and should be proportionate to the sensitivity of the information and the circumstances. If it is thought that a crime has been committed and/or a child is at immediate risk, the police should be notified immediately.

# Legislative framework

Key organisations who have a duty under section 11 of the Children Act 2004 to have arrangements in place to safeguard and promote the welfare of children are:

- the local authority;
- NHS England;
- clinical commissioning groups;
- NHS Trusts, NHS Foundation Trusts;
- the local policing body;
- British Transport Police Authority;
- prisons;

National Probation Service and Community Rehabilitation Companies;<sup>4</sup>

youth offending teams; and

 bodies within the education and /or voluntary sectors, and any individual to the extent that they are providing services in pursuance of section 74 of the Education and Skills Act 2008.

<sup>&</sup>lt;sup>4</sup> The duty under section 11 of the Children Act 2004 will apply to Community Rehabilitation Companies via contractual arrangements entered into by these bodies with the Secretary of State under Section 3 of the Offender Management Act 2007.

There are also a number of other similar duties, which apply to other organisations. For example, section 175 of the Education Act 2002 which applies to local authority education functions and to governing bodies of maintained schools and further education institutions, and section 55 of the Borders, Citizenship and Immigration Act 2009 which applies to the immigration, asylum, nationality and customs functions of the Secretary of State (in practice discharged by UK Visas and Immigration, Immigration Enforcement and the Border Force, which are part of the Home Office).

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can improve decision-making so that actions taken are in the best interests of the child. The GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or well-being of a child to be compromised. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns.

All organisations should have arrangements in place, which set out clearly the processes and the principles for sharing information internally. In addition, these arrangements should cover sharing information with other organisations and practitioners, including third party providers to which local authorities have chosen to delegate children's social care functions, and any Local Safeguarding Children Board (LSCB) still operating within the local authority area as well as safeguarding partners (please see below).

One approach to aid effective information sharing is the use of Multi-Agency Safeguarding Hubs, where teams may be co-located physically or locally. In these settings, it is important that accountability is defined to ensure that teams know who is responsible for making decisions and that actions taken are in the best interest of the child.

Safeguarding partners (as defined in Section 16E of the Children Act 2004) and LSCBs (where still in operation) should play a strong role in supporting information sharing between and within organisations and addressing any barriers to information sharing. This should include ensuring that a culture of appropriate information sharing is developed and supported as necessary by multi-agency training.

Safeguarding partners and LSCBs (where still in operation) can require a person or body to comply with a request for information, as outlined in sections 16H and 14B of the Children Act 2004, respectively. This can only take place when the information requested is for the purpose of enabling or assisting the safeguarding partners or LSCB to perform their functions. Any request for information to a person or body, should be necessary and proportionate to the reason for the request. Safeguarding partners and LSCBs should be mindful of the burden of requests and should explain why the information is needed.

# The principles

The principles set out below are intended to help practitioners working with children, young people, parents and carers share information between organisations. Practitioners should use their judgement when making decisions about what information to share, and should follow organisation procedures or consult with their manager if in doubt.

The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child.

# **Necessary and proportionate**

When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

# Relevant

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

# **Adequate**

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

# **Accurate**

Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

# **Timely**

Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young person at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

# **Secure**

Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.

# Record

Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

# When and how to share information

When asked to share information, you should consider the following questions to help you decide if, and when, to share. If the decision is taken to share, you should consider how best to effectively share the information. A flowchart follows the text.

# When

Is there a clear and legitimate purpose for sharing information?

- Yes see next question
- No do not share

Do you have consent to share?

- Yes you can share but should consider how
- No see next question

Does the information enable an individual to be identified?

- Yes see next question
- No you can share but should consider how

Have you identified a lawful reason to share information without consent?

- Yes you can share but should consider how
- No do not share

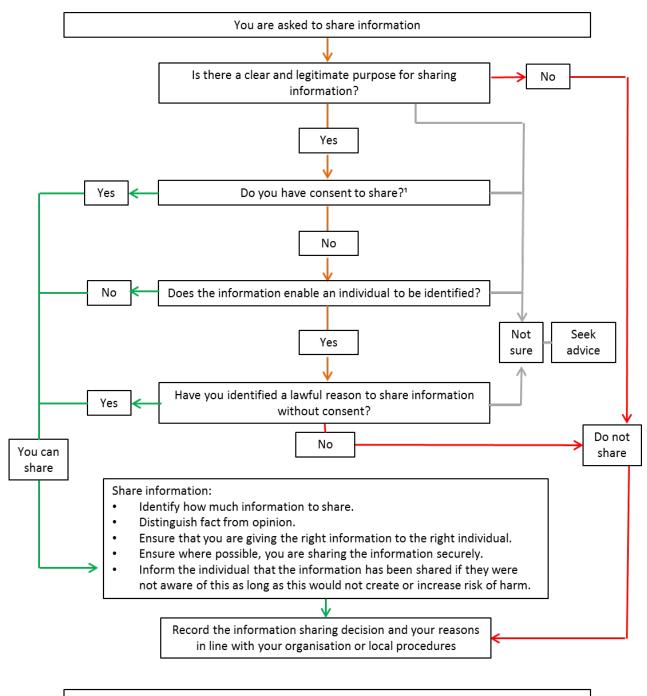
# How

- Identify how much information to share
- Distinguish fact from opinion
- Ensure that you are giving the right information to the right individual
- Ensure where possible that you are sharing the information securely
- Where possible, be transparent with the individual, informing them that that the information has been shared, as long as doing so does not create or increase the risk of harm to the individual.

All information sharing decisions and reasons must be recorded in line with your organisation or local procedures. If at any stage you are unsure about how or when to

share information, you should seek advice on this. You should also ensure that the outcome of the discussion is recorded.

# Flowchart of when and how to share information



If there are concerns that a child is in need, suffering or likely to suffer harm, then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

<sup>1.</sup> Consent must be unambiguous, freely given and may be withdrawn at any time

# Myth-busting guide

Sharing of information between practitioners and organisations is essential for effective identification, assessment, risk management and service provision. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect. Below are common myths that can act as a barrier to sharing information effectively:

# The GDPR and Data Protection Act 2018 are barriers to sharing information

No – the GDPR and Data Protection Act 2018 do not prohibit the collection and sharing of personal information. They provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them. Never assume sharing is prohibited – it is essential to consider this balance in every case. You should always keep a record of what you have shared.

# Consent is always needed to share personal information

No – you do not necessarily need the consent of the information subject to share their personal information.

Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given.

There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk.

Where a decision to share information without consent is made, a record of what has been shared should be kept.

# Personal information collected by one organisation cannot be disclosed to another organisation

No - this is not the case, unless the information is to be used for a purpose incompatible with the purpose it was originally collected for. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners.

Practitioners looking to share information should consider which processing condition in the Data Protection Act 2018 is most appropriate for use in the particular circumstances of the case. This may be the safeguarding processing condition or another relevant provision.

# The common law duty of confidence and the Human Rights Act 1998 prevent the sharing of personal information

No - this is not the case. In addition to the GDPR and Data Protection Act 2018, practitioners need to balance the common law duty of confidence, and the rights within the Human Rights Act 1998, against the effect on children or individuals at risk, if they do not share the information.

If information collection and sharing is to take place with the consent of the individuals involved, providing they are clearly informed about the purpose of the sharing, there should be no breach of confidentiality or breach of the Human Rights Act 1998. If the information is confidential, and the consent of the information subject is not gained, then practitioners need to decide whether there are grounds to share the information without consent. This can be because it is overwhelmingly in the information subject's interests for this information to be disclosed. It is also possible that a public interest would justify disclosure of the information (or that sharing is required by a court order, other legal obligation or statutory exemption).

In the context of safeguarding a child or young person, where the child's welfare is paramount, it is possible that the common law duty of confidence can be over overcome. Practitioners must consider this on a case-by-case basis. As is the case for all information processing, initial thought needs to be given as to whether the objective can be achieved by limiting the amount of information shared – does all of the personal information need to be shared to achieve the objective?

# IT Systems are often a barrier to effective information sharing

No – IT systems, such as the Child Protection Information Sharing project (CP-IS), can be useful in supporting information sharing. IT systems are most valuable when practitioners use the data that has been shared to make more informed decisions about how to support and safeguard a child. Evidence from the Munro Review is clear that IT systems will not be fully effective unless individuals from organisations co-operate around meeting the needs of the individual child. Professional judgment is the most essential aspect of multi-agency work, which could be put at risk if organisations rely too heavily on IT systems.

# Useful resources and external organisations

- The Information Commissioner's Office (ICO) website
- Practice guidance on sharing adult safeguarding information

# Other relevant departmental advice and statutory guidance

- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2016)
- What to do if you're worried a child is being abused (2015)



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Reference: DFE-00128-2018

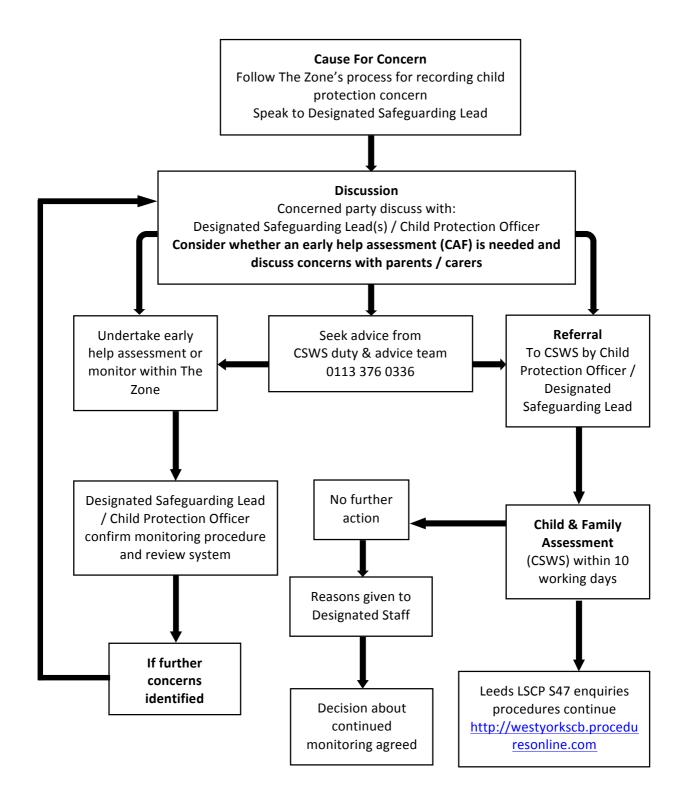
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# **Confidentiality and Information Sharing**

Confidentiality is an issue that needs to be understood by all those working with children, particularly in the context of safeguarding.

The Zone recognises that the only purpose of confidentiality in this respect is to benefit the child. Staff / volunteers and visitors to The Zone should never promise a child that they will not tell anyone about an allegation / disclosure, and must pass any cause for concerns immediately to a designated safeguarding lead.

Confidentiality is addressed throughout this policy with respect to record-keeping, dealing with, allegations of abuse against staff, information sharing and working with parents.

# **Information Sharing**

Timely information sharing is essential for effective safeguarding. Information. The Zone will share safeguarding information as appropriate in keeping with the principles outlined in the government guidance document, Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018). This guidance has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

# Working with parents and other agencies to protect children

Parents / carers should be aware that The Zone will take any reasonable action to safeguard the welfare of its users. In cases where The Zone has reason to be concerned that a child may be suffering significant harm, ill treatment or neglect or other forms of harm, staff have no alternative but to follow the Leeds Safeguarding Partnership (LSCP) procedures and contact CSWS Duty and Advice team to discuss their concerns.

In general, we will discuss concerns with parents / carers before approaching other agencies and will seek to inform parents / carers and receive their consent when making a referral to another agency. Appropriate staff will approach parents / carers after consultation with the DSL. The exception to this rule will be in situations where a member of staff has reasonable cause to believe that informing parents / carers of a referral to another agency may increase the risk of significant harm to the child.

# Multi-agency work

We will co-operate with CSWS in accordance with the requirements of the Children Act and allow access to child and child protection records for them to conduct section 17 or section 47 assessments.

In the best interests of our users, we will work with all relevant professionals and agencies as required to safeguarding children and promote their welfare.



# Leeds Judean Club For Boys & Girls t/a The Zone – Privacy Policy

The Zone takes the privacy and security of your data very seriously.

This privacy policy sets out how The Zone processes personal data (information by which an individual can be identified) collected by us in the course of our lawful activities, and explains our obligations and your rights under the Data Protection Act 1998 and any subsequent UK legislation and regulations ('Data Protections laws'). This policy has been put in place to protect your rights under the Data Protection laws, and it is important that you understand what we will do with your data and are happy with this.

# **Modifications to this Policy**

From time to time, The Zone may need to update or modify this Privacy Policy, including to address new issues or to reflect changes on our site located at www.1zone.org.uk ("Site"). To the extent required by law, The Zone will notify you of material changes to this Privacy Policy, including by posting the most recent version of the Privacy Policy and information about the changes from the previous version on the The Zone's website.

References to the processing of information includes the collection, use, storage and protection of data.

The Zone is the 'data controller' for the purposes of this policy, and the policy extends to its staff, trustees, volunteers and anyone else processing data on our behalf from time to time. The Zone is committed to ensuring that your privacy is protected. Any personal data collected by The Zone will only be processed in accordance with this privacy policy.

Organisations are permitted to process data if they have a legal basis for doing so. The Zone processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed; and/or
- The Zone has a legitimate interest in processing data; and/or
- It is necessary in relation to a contract or agreement which the person has entered into or because the person has asked for something to be done so they can enter into a contract or agreement; and/or
- There is a legal obligation on The Zone to process data.

Where The Zone is relying solely on consent as the basis for processing data, we are required to obtain your explicit consent and you can modify or withdraw this consent at any time by notifying us in writing or amending your contact preferences / unsubscribing via our database, although this may affect the extent to which we are able to provide services to or interact with you in future.

# **Collection of Personally Identifiable Information**

Data collected and processed may include, but not be limited to:

- Names and contact information such as telephone numbers, email and postal addresses
- Stakeholder, supporter and donor records (including payment information) and preferences
- Such other information that is relevant and necessary for The Zone to carry out its activities, charitable purposes and legal obligations.

The Zone collects information directly from you through, for example, online application and registration forms, when subscribing to our mailing list as well as offline, through membership / event registration forms, or meetings.

Information is collected and maintained from participants in Zone activities, application forms, current and past website users, survey respondents, fundraising and marketing and others. To the extent that information requested is not required for your participation in a given Zone activity / opportunity, you will be told which information is optional.

The Zone may also maintain information about you that you do not directly provide, whether it is information received from third parties, such as employers and partners or information The Zone collects about your activities.

# What we do with the data we process

The Zone uses the data collected to maintain accurate internal records of our engagement with volunteers, charities, supporters, partner organisations, staff and others. These records facilitate our activities run in accordance with our charitable objectives, including providing opportunities for young people and their families, the use of our youth support service and raising funds / awareness about our work through campaigns and events.

Data may be processed and viewed, to the extent necessary, by staff, trustees and certain volunteers in the course of The Zone's activities (all of whom work in accordance with this privacy policy) and will be retained only for as long as is reasonable and permissible in law.

The data of individuals seeking to volunteer with other charities may be shared with them in the course of seeking suitable connections. Any personal data of a (potential) volunteer is shared with a charity under strict understanding that this is only for the purposes of the volunteering opportunity.

The Zone uses personally identifiable information gathered and stored on The Zone database for the purposes described at the time of collection or for the purpose of receiving information about general Zone activities / opportunities and specific initiatives that we think will be of interest to you; and for The Zone to evaluate the reach and impact of its initiatives.

The Zone may share personally identifiable information with third parties for legitimate business purposes, including for the following reasons or in the following circumstances:

- To vendors or third-parties who deliver or provide goods and services or otherwise act on behalf of or at the direction of The Zone, which third parties include, for example, training providers and partners, product-fulfilment companies, third-party event hosts, other third parties who may provide services on web sites that are accessible from links on one of our Sites, and credit card companies processing payment;
- If you are an event attendee, speaker, or sponsor, some of your information may be included in the event program, which can be publicly disclosed, and may also be shared with third-party event sponsors and exhibitors;
- To investigate potentially fraudulent or questionable activities;
- When we believe it is necessary to cooperate with law enforcement or in response to a government request, including if specifically requested or required, as otherwise permitted by law, and for other valid ISACA business purposes.

The Zone retains personally identifiable information for as long as necessary for its legitimate activities, and as otherwise permitted by applicable law.

You, as the data subject, may request deletion of your data at any time in writing, subject to any overriding legal requirement for its retention. You, as data subject, can also unsubscribe via the website of any mailing list you are subscribed to.

# Your rights in relation to your personal data

You may request details of personal information which we hold about you. Any such request must be submitted in writing. A small fee may be payable if an information request is particularly onerous.

You may choose to restrict the collection or use of your personal information, but this may inhibit or limit the way in which The Zone is able to interact with you. You may, at any time, change your mind about what information we hold about you, or if we continue to hold it at all, subject to any legal obligation on The Zone to retain data, such as the retention of Gift Aid records for Her Majesty's Revenue and Customs.

You are responsible for the accuracy of data you have provided to The Zone. If you believe that any information we are holding on you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

We may use your personal information to send you information about The Zone and matters relating to Zone activities which we think may be of interest to you. We will only share data with trusted third parties as stated above, or where necessary for us to communicate with you (such as mailing companies for postal communications or through email campaigns or newsletters) or as stated above, and only once we are satisfied that any such use of data will accord with our privacy policy. We will not sell or share your personal information with any other businesses or marketing companies.

You can obtain further information about Data Protection and privacy laws by visiting the Information Commissioner's website at: https://ico.org.uk/for-the-public.

# Security

The Zone uses reasonable measures to safeguard sensitive personally identifiable information, with measures that are appropriate to the type of information maintained, and follows applicable laws regarding safeguarding any such information under our control. In addition, our website, uses Secure Socket Layer ("SSL") to enhance data privacy and help prevent loss, misuse, or alteration of the information under The Zone's control. The Zone cannot guarantee, however, that your information will remain secure. The Internet by its nature is a public forum, and The Zone encourages you to use caution when disclosing information online. Often, you are in the best situation to protect yourself online.

#### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website(s) in question.

#### Your consent

This policy serves to inform you of your rights and our obligations in relation to your personal data. In order for us to be able to continue to communicate with you fully in future (using both electronic and non-electronic means).

**Children's Consent** - If a child is under 16 The Zone will acquire parental or guardian's consent in order to process the child's personal data. When the individual stops being a child, the parent or guardian's permission become invalid and new consent must be obtained from the individual.

# How to contact The Zone and modify your information or preferences

Questions regarding this Privacy Policy should be directed to The Zone by email at gdpr@1zone.org.uk

If you would like to modify the types of email messages you receive from us you may unsubscribe by following the instructions in the footer of any email message that you receive from us. To help us keep your personal information up to date, or to request access to the personal information The Zone maintains about you, you may contact us at The Zone, The Henry Cohen Campus, Primley Park Road, Leeds, LS17 7HR.

For general enquiries please email info@1zone.org.uk

If you would like us to remove you from our database please contact gdpr@1zone.org.uk

# **Appendix 5**

# **CONDITIONS OF ENTRY TO THE ZONE**

The Zone reserves the right, at its absolute discretion, to refuse admission to any person and/or to eject any person from the premises if it considers that person's behaviour or conduct is causing, or is likely to cause (without limitation), damage; injury; nuisance; or distress to others.

In order to ensure that The Zone is a safe environment, we may search you, your clothing, bags or other items at any time at our sole discretion. The search may take the form of a body search or utilisation of a scanning device. The safety and security of our users is paramount to us, therefore two adults of the same sex will conduct all searches. Consent will always be sought, however refusal or failure to co-operate in any search may result in you being refused entry or being ejected from The Zone.

We reserve the right to prohibit certain items. Prohibited items include:

- Knives or weapons
- Alcohol
- Illegal drugs
- Stolen items
- Fireworks
- Pornographic images
- Any article that a member of staff reasonably suspects has been, or may be, used to commit an
  offence or injure a person or damage property

#### ANTI SOCIAL BEHAVIOUR

We adopt a zero tolerance approach to anti-social, abusive, aggressive or violent behaviour. Any person who is aggressive or abusive towards a member of staff, another customer or who damages property will be refused service, removed from the premises and suspended from using our facilities for a period of time determined by The Zone management.

# CCTV

By attending The Zone you consent to being filmed or recorded by CCTV, the police or other security staff for the purpose of safety and monitoring.

#### PERSONAL PROPERTY

It is your responsibility to keep your personal possessions safe at all times whilst at The Zone. The Zone shall not be liable for the loss, damage or theft of any items.

#### **SMOKING**

The Zone operates a strict no smoking policy. It is illegal to smoke anywhere inside The Zone and is prohibited on The Henry Cohen Campus. Anyone caught smoking will be removed from the site. The use of E-cigarettes is also not permitted in The Zone.

#### **FOOD & BEVERAGES**

The Zone is strictly Kosher and under supervision of The Leeds Beth Din. Café Chai at The Zone is a vegetarian café and no meat products are allowed in the building at all. Failure to comply with kashrut will result in you being asked to leave The Zone.

#### **ANIMALS**

With the exception of guide or assistance dogs, no animals are permitted in The Zone.

# Appendix 6

# **Useful Contacts / Support Organisations**

If you have concern that a child is being harmed as a result of abuse or neglect, you must not keep these concerns to yourself. Keeping children safe is everyone's responsibility.

You need to ensure that you speak to the appropriate organisations that can listen to and record your concern, and then take appropriate action.

In Leeds, these are the numbers that you can ring for advice and to make a referral:

**Childrens Social Work Services (CSWS) & Advice Team – For Professionals**: 0113 376 0336 between 9.00am to 5.00pm.

Out Of Hours, **Children's Emergency Duty Team** (EDT) on 0113 5350600. If you believe a child is in immediate danger and at risk of harm call the **Police** on 999.

CSWS For The Public: 0113 222 3301

The Local Authority Designated Officers in Leeds can be contacted Monday to Friday on: 0113 3789687

You can also seek advice and clarity about a situation that is beginning to raise concern through the **NSPCC** on 0808 800 5000.

It is the responsibility of all staff and volunteers to familiarise themselves with this policy and these procedures. Extra copies of it are available upon request.



The Zone, Henry Cohen Campus, Leeds LS17 7HR
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