Safeguarding Children and Adults at risk of harm Policy and Procedures

EY Foundation

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Amendment History

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September 2021	20/07/2022	Add paragraph 12: "Staff, Secondees & Volunteers Background Checks Policy & Procedures" Amendments to DSO contact details	Jodie McNally
September 2022	09/03/2023	Addition to 12.1 to reflect changes in Vetting policy as advised by Volunteer Scotland (p.26)	Grace Brown
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September 2023	13/08/2024	Minor updates relating to terminology and definitions, contacts / names, data protection language and the type of training required (updated to specific Trustee safeguarding training p.27).	Jodie McNally
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August 2026	18/08/2026	Updates to DSO / Key Contacts. Added additional definitions to categories of abuse. Added consent section. Added new visual procedures.	Jodie McNally

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1. Safeguarding Children and Adults at risk of harm Policy

This policy applies to all staff, including senior managers and the Board of Trustees, Youth Voice Forum (YVF) or equivalent, volunteers and seconded staff, mentors, agency staff, contract, seasonal, apprentices, interns, students or anyone working on behalf of the EY Foundation in either a voluntary or paid capacity. This also includes third party suppliers.

1.1 The purpose of this policy

- to protect children and adults at risk of harm (collectively referred to as "young people") who receive EY Foundation services. Under the *Children Act 1989,* a child is legally defined as anyone who has not reached their 18th birthday. An adult at risk of harm is a person aged 18 or over who; has needs for care and support (whether or not the local authority is meeting those needs); and is experiencing, or is at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from abuse or neglect.
- to provide staff, trustees, volunteers, and third-party suppliers, with the overarching principles that guide our approach to safeguarding.

The EY Foundation believes that a young person should never experience abuse of any kind. We believe everyone has a responsibility to promote the welfare of all young people and to keep them safe and to practice in a way that protects them.

1.2 Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect young people in England and Scotland. A summary of the key legislation and guidance is available from www.nspcc.org.uk/childprotection

1.3 Supporting Documents

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:

Records retention and storage

Code of conduct for staff, volunteers and programme participants

Photography and sharing images guidance

Safer recruitment

Online safety

Complaints Policy

Whistleblowing Policy

Health and Safety Policy

1.4 We recognise that

- The welfare of young people is paramount in all the work we do and all the decisions we take
- All young people, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have an equal right to protection from all types of harm or abuse

- Working in partnership with young people, their parents, carers and other agencies is essential in promoting young people's welfare
- Some young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues. Extra safeguards may be needed to keep young people who are additionally vulnerable safe from abuse.

1.5 We will seek to keep young people safe by

- Valuing, listening to and respecting them
- Appointing a nominated child protection lead, a deputy, and a member of the trustee board who takes lead responsibility for safeguarding
- Adopting child protection and safeguarding best practice through our policy and procedures and a code of conduct for staff, trustees, and volunteers
- Providing effective management for staff, trustees and volunteers through supervision, support and training, including compulsory online child protection and safeguarding training where required. We will also ensure that they understand and follow the safeguarding reporting procedures.
- Recruiting staff, trustees and volunteers safely, ensuring all necessary checks are made
    - Recording and storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: ico.org.uk/fororganisations]
    - Making sure that young people and their families know where to go for help if they have a concern
    - Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving young people, parents, families and carers appropriately
    - Using our procedures to manage any allegations against staff and volunteers appropriately
    - Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
    - Ensuring that we have effective complaints and whistleblowing measures in place
    - Ensuring that we provide a safe physical environment for our young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
    - Building a safeguarding culture where staff and volunteers, young people and their families, treat each other with respect and are comfortable about sharing concerns.

    We are committed to reviewing our policy annually.

    This policy was last reviewed in August 2026

2. Code of Conduct

2.1 Purpose and scope

This code of conduct outlines the behaviour that EY Foundation expects from all our staff and volunteers. This includes trustees, agency staff, interns, students on work placement and anyone who is undertaking duties for the organisation, whether paid or unpaid.

EY Foundation is responsible for making sure everyone taking part in our activities has seen, understood and agreed to follow the code of conduct, and that they understand the consequences of inappropriate behaviour.

2.2 The role of staff, trustees and volunteers

In your role at EY Foundation you are acting in a position of trust and authority and have a duty of care towards the young people we work with. You are likely to be seen as a role model by young people and are expected to act appropriately. We expect people who take part in our services to display appropriate behaviour at all times. This includes behaviour that takes place outside our organisation and behaviour that takes place online.

Responsibility of staff, trustees and volunteers:

You are responsible for:

- Prioritising the welfare of young people
- Providing a safe environment for young people
- Ensuring equipment is used safely and for its intended purpose
- Having good awareness of issues to do with safeguarding and child protection and taking action when appropriate
- Following our principles, policies and procedures including our policies and procedures for safeguarding and child protection, whistleblowing and online safety
- Staying within the law at all times
- Modelling good behaviour for young people to follow
- Challenging all inappropriate behaviour and reporting any breaches of the behaviour code to the Chief Programmes Officer
- Reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures, this includes inappropriate behaviour displayed by an adult or child and directed at anybody of any age.

2.3 Respecting young people

You should:

- Listen to and respect young people at all times
- value and take young people's contributions seriously, actively involving them in planning activities wherever possible
- Respect a young person's right to personal privacy as far as possible. If you need to break confidentiality in order to follow safeguarding procedures, it is important to explain this to the young person at the earliest opportunity.

2.4 Diversity and Inclusion

You should:

- Treat young people fairly and without prejudice or discrimination
- Understand that young people are individuals with individual needs
- Respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the organisation
- Challenge discrimination and prejudice
- Encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

2.5 Appropriate Relationships

You should:

- Promote relationships that are based on openness, honesty, trust and respect
- Avoid showing favouritism
- Be patient with others
- Exercise caution when you are discussing sensitive issues with young people
- Ensure your contact with young people is appropriate and relevant to the nature of the activity you are involved in
- Ensure that whenever possible, there is more than one adult present during activities with young people. If a situation arises where you are alone with a young person, ensure that you are within sight or can be heard by other adults

2.6 Inappropriate Behaviour

When working with young people, you must not:

- Allow concerns or allegations to go unreported
- Take unnecessary risks
- Smoke, consume alcohol or use illegal substances
- Develop inappropriate relationships with young people
- Make inappropriate promises to young people
- Engage in behaviour that is in any way abusive, including having any form of sexual contact with a young person
- Let young people have your personal contact details or have contact with them via a personal social media account
- Act in a way that can be perceived as threatening or intrusive
- Patronise or belittle young people
- Make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of young people.

You should always follow this code of conduct and never rely on your reputation or that of our organisation to protect you. If you have behaved inappropriately, you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you might be asked to leave EY Foundation. We might also make a report to statutory agencies such as the police and/or the local authority child protection services. If you become aware of any breaches of this code, you must report them to the CEO. If necessary, you should follow our whistleblowing procedure and safeguarding procedures.

3. Procedures for young people at possible risk of abuse

This procedure applies to any paid member of staff, trustee or volunteer who may be concerned about the safety and protection of a young person.

3.1 Purpose and aim of this procedure

We aim to ensure those young people who are beneficiaries of the work delivered by the EY Foundation receive the protection and support they need if they are at risk of abuse. This procedure provides clear direction to staff, trustees, and volunteers at EY Foundation if they have concerns that a young person is in need of protection.

3.2 Different types of abuse (as defined by the NSPCC)

Physical abuse is defined as deliberately hurting a young person and causing physical harm. It includes injuries such as: bruises, broken bones, burns and cuts

It may involve:

- hitting, kicking, shaking, throwing, poisoning, burning, scalding, drowning or any other method of causing non-accidental harm to a young person

Physical abuse may also happen when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person.

Sexual abuse is when a young person is forced or persuaded to take part in sexual activity. This may involve physical contact or non-contact activities and can happen online or offline. Contact abuse involves activity where an abuser makes contact with a young person. It includes:

- Sexual touching of any part of the body whether a young person is wearing clothes or not
- Forcing or encouraging a young person to take part in sexual activity
- Making a young person take their clothes off or touching someone else's genitals
- Rape or penetration by putting an object or body part inside a young person's mouth, vagina or anus

Non-contact abuse involves activities where there is no physical contact. It includes:

- Flashing at a young person
- Encouraging or forcing a young person to watch or hear sexual acts
- Not taking proper measures to prevent a young person being exposed to sexual activity by others
- Making a young person masturbate whilst others watch
- Persuading a young person to make, view or distribute child abuse images
- Making, viewing or distributing child abuse images
- Allowing someone else to make, view or distribute child abuse images
- Meeting a young person following grooming with the intent of abusing them
- Sexually exploiting a young person for money, power or status

Emotional abuse is emotional maltreatment of a young person, which has a severe and persistent negative effect on the young person's emotional development. It is also known as psychological abuse. There are several categories of emotional abuse:

- Bullying – verbal humiliation; name-calling; undermining or mocking a young person

- Rejection – telling a young person they aren't good enough; not listening to a young person or letting them express their views; belittling a young person; not communicating with a young person; physical abandonment; excluding the young person from activities
- Manipulation – gaslighting; coercing or persuading a young person to take part in activities that they aren't comfortable with; aren't appropriate for their age or stage of development; are unsafe;
- Imposing unreasonable expectations – interacting with young people in ways that are beyond their developmental capability; putting unreasonable limitations on a young person's freedom; restricting or preventing social interaction
- Terrorising – threatening violence; deliberately frightening a young person; deliberately putting a young person in a dangerous situation
- Exposing to ill-treatment of others – young people seeing or hearing ill-treatment of others, including through domestic abuse

Neglect is not meeting a young person's basic physical and psychological needs. The four main types of neglect are:

- Physical neglect – not meetings a young person's basic needs, such as food clothing or shelter; not supervising a young person adequately or providing for their safety
- Education neglect - not making sure a young person receives an education
- Emotional neglect - not meeting a young person's needs for nurture and stimulation, for example by ignoring, humiliating, intimidating or isolating them.
- Medical neglect – not providing appropriate healthcare, refusing care or ignoring medical recommendation

Adults at Risk of Harm may be subject to additional categories of abuse:

- Financial or material: including withholding money or possessions, theft of money or property, fraud, intentionally mismanaging finances, borrowing money and not repaying
- Discriminatory abuse: including slurs, harassment and maltreatment due to a person's race, gender, disability, age, faith, culture or sexual orientation
- Institutional abuse: including the use of systems and routines which neglect a person receiving care. This can happen in any setting where formal care is provided.
- Self-Neglect: including failing to engage with essential support, extreme neglect of personal care, unsafe living conditions, substance misuse creating significant risk.
- Modern Slavery: including human trafficking, forced labour, domestic servitude, debt bondage and other forms of exploitation where a person is controlled or coerced for another person's gain.
- Organisational Abuse: including neglect, poor professional practice, unsafe systems or a culture within an organisation that compromises a person's safety, wellbeing, dignity or rights.
- Domestic Abuse: including controlling or coercive behaviour, threats, violence, emotional abuse, psychological abuse, sexual abuse and financial abuse by a partner, ex-partner or family member.

If you are worried about a young person or an adult at risk of harm, even if you are unsure, then please contact a Designated Safeguarding Lead (see section 6.8 contact details) immediately.

3.3 Ways that abuse might be brought to someone's attention

A young person might make a direct disclosure about themselves.

A young person might make a direct disclosure about another young person.

A young person might offer information that is worrying but not a direct disclosure.

- A member of staff/trustee/volunteer might be concerned about a young person's appearance or behaviour or about the behaviour of a parent or carer towards a young person
- A parent or carer might make a disclosure about abuse that a young person is suffering or at risk of suffering
- A parent/carer might offer information about a young person that is worrying but not a direct disclosure

- Staff should remain professionally curious where an adult appears unusually vulnerable, withdrawn, fearful, exploited or dependent upon another person. Concerns should always be discussed with a DSL.

3.4 Talking to a young person who has said that they or another young person is being abused

- Stay calm, listen carefully and take it seriously
- Give your full attention and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases such as 'you've shown such courage today', can help
- Respect pauses and don't interrupt them– let them go at their own pace. Recognise and respond to their body language. And remember that it may take several conversations for them to share what's happened to them.
- Make it clear you're interested in what the young person is telling you. Reflect back what they've said to check your understanding – use their language to show it's their experience.
- Consult a Designated Safeguarding Lead (see section 6.8 contact details) immediately (i.e. on the same day the young person discloses information about a potential abuse)
- In the event that a Designated Safeguarding Lead cannot be reached by the close of play that day, please contact the NSPCC Hotline on 0808 800 5000
- For out of hours, please contact the NSPCC Hotline on 0808 800 5000
- Make a careful record of what was said – write down their exact words if possible (see Appendix A)

3.5 Helping a young person in immediate danger

- If the young person is in immediate danger and is in the immediate vicinity, remain with him/her and call the police on 999

If the young person is elsewhere, contact the police and explain the situation to them.

3.6 Consent and Mental Capacity

Adults at risk of harm should normally be involved in decisions about sharing information and referrals wherever possible. Consent should be sought before making a referral unless:

There is a risk of serious harm to the individual or others;

A crime has been committed;

The person lacks capacity to make the decision;

- there is a public interest reason to share information.

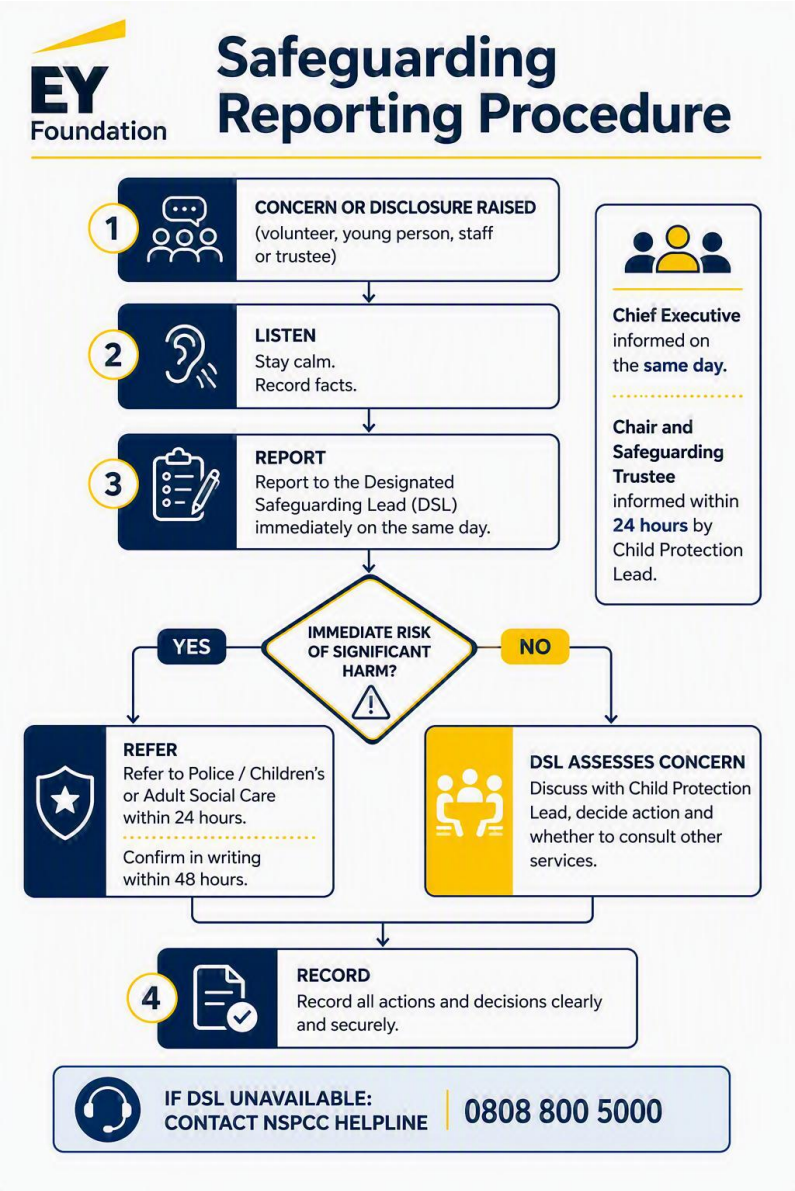
EY Foundation recognises the principles of the Mental Capacity Act 2005. We will assume adults have capacity to make decisions unless it is established otherwise. Support will be provided to enable individuals to participate in safeguarding decisions wherever possible.

3.7 Keeping a record of concerns

The Designated Safeguarding Lead for child protection will provide a form to record the concern and how it is dealt with. The relevant sections of the form should be completed and then it should be signed. It can be used to forward information to the statutory child protection authorities if a referral to them is needed.

The form should be signed and dated by all those involved in its completion and kept confidentially on the private drive for Safeguarding. The name of the person making the notes should be written alongside each entry. Records are kept in a secure e-folder which only the Child Protection Lead and Designated Safeguarding Lead and Deputy Child Protection Lead and Designated Safeguarding Lead have access to. The Chief Executive Officer, or Chief Financial Officer of the EY Foundation will be notified by Designated Safeguarding Leads of any child protection concerns and any course of action to be followed, although personal details will not be disclosed. The Child Protection Lead and Designated Safeguarding Lead will also notify the EY Foundation Chair within 24 hours. They will inform the wider EY Foundation board as appropriate.

3.8 Reporting procedure



3.9 The responsibility to report serious incidents to the Charity Commission

The Charity Commission requires any registered charity to report 'serious incidents'. We must report to the Charity Commission if any safeguarding concerns have resulted or could have resulted in harm. This includes some situations where our own policies or procedures have not been followed properly. If those breaches have put people who come into contact with the charity through its work at significant risk of harm, we must report them even if no actual harm occurred.

A report should always be made where the level of harm to the victims and/or the likely damage to the reputation of or public trust in the charity is particularly high.

The responsibility for reporting serious incidents rests with the charity's trustees. In practice, this may be delegated to someone else within the charity, such as the CEO or DSL.

Upon receipt of a report, the role of the Charity Commission must:

Focus on the conduct of the trustees.

Focus on steps the trustees have taken to protect the charity.

consider what the trustees have done to make sure they're compliant with their legal duties and responsibilities towards the charity in managing safeguarding concerns.

3.10 Contact details

A minimum of two DSL's will be available at all times

EY Foundation team	Name	Contact
Child Protection Lead and Designated Safeguarding Lead (Chief Programmes Officer)	Jodie McNally	07717492979
Deputy Child Protection Lead and Designated Safeguarding Lead	Robert Pope	07798 928419
Designated Safeguarding Lead	Parvin Akhtar	07834 908357
Designated Safeguarding Lead	Pauline Barba	07917 721699
Designated Safeguarding Lead	Anita Chouhan	07500 028402
Designated Safeguarding Lead	James Dundas	07469 036520
Designated Safeguarding Lead	Chi Nkem	07385 422725
Designated Safeguarding Lead	Sarah Batty	07795 385407
Designated Safeguarding Lead	Millie Rudman	07385 958144
Designated Safeguarding Lead	Amira Ismail	07387 042636
Designated Safeguarding Lead	Megan Young	07531 271138
Chief Executive Officer	Lynne Peabody	07958 269112

Location	Local Authority Children's Social Care Department	Local Authority Adult Social Care Department
Birmingham	0121 303 1888	0121 303 1234
Bristol	0117 357 4700	0117 922 2700
Cambridge	0345 045 5203	0345 045 5202
Edinburgh	0131 200 2327	0131 200 2324
Glasgow	0141 287 0555	0141 287 0555
Leeds	0113 222 4403	0113 222 4401
Liverpool	0151 233 3700	0151 233 3800
London	Different for each LA	Different for each LA
Luton	01582 547653	01582 547730

EY Foundation team	Name	Contact
Manchester	0161 234 5001	0161 234 5001
Newcastle	0191 277 2500	0191 278 8377
Reading	0118 937 3641	0118 937 3747
Southampton	023 8083 3336	023 8083 3003

Other useful contacts	Phone	Internet
NSPCC Hotline	0808 800 5000	help@nspcc.org.uk
Childline	0800 1111 (textphone 0800 400 222)	www.childline.org.uk

3.11 Dealing with allegations involving EY Foundation staff and/or volunteers, trustees and young people

This procedure outlines what should happen if an allegation is made against an adult or young person working for or involved in the EY Foundation. Please also refer to the EY Foundation Whistleblowing policy, which is referenced later on in this document.

This procedure applies to:

- any member of staff, volunteer, young person or trustee to whom an allegation of abuse has been made, that involves another member of staff, volunteer, trustee or young person
- anyone in a managerial position (including the named person for child protection, line managers, supervisors and trustees) who may be required to deal with such allegations and manage investigations that result from them

Concerns about staff, trustees, volunteers and other young people must be treated with the same rigor as other child protection concerns. If a concern or allegation of abuse or inappropriate conduct is made against a member of staff, or a person in a position of trust, or there is suspicion regarding a member of staff, trustees, volunteers or young person's conduct, with regard to children, they must be reported immediately to a Child Protection Lead and Designated Safeguarding Lead. If the allegation or suspicion concerns a Designated Safeguarding Lead, then contact the Chief Executive Officer of the Foundation. If the allegation or suspicion concerns the Chief Executive, then contact the Chair of the Foundation.

The aims of this procedure are:

- to ensure that young people who participate in the EY Foundation programmes, are protected and supported following an allegation that they may have been abused by an adult from within the EY Foundation, or another young person on the programme
- to ensure that there is a fair, consistent and robust response to any allegations made, so that the risk posed to other young people by an individual is managed effectively
- to facilitate an appropriate level of investigation into allegations, whether they are said to have taken place recently, at any time the person in question has been employed by/volunteered with the EY Foundation or prior to the person's involvement with the EY Foundation (i.e. if it comes to attention whilst the person is working on behalf of the EY Foundation)

- to ensure that the EY Foundation continues to fulfil its responsibilities towards members of staff, volunteers, trustees or young people who may be subject to such investigations, for example giving consideration to the provision of appropriate support during and after the investigation
- to ensure that individuals are able to continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin.

There are potentially three issues that need to be dealt with as a matter of urgency:

1. *Is a young person in immediate danger or does she/he need emergency medical attention?*

   If yes, follow the same procedure as identified in section 6.5 above.

2. *Is the person at the centre of the allegation another young person on an EY Foundation programme?*

   If this is the case, the concern needs to be discussed immediately with the Chief Executive of the Foundation or the Chief Financial Officer in her absence and the Child Protection Lead.

   One of these should then contact EY HR and the school/youth provider (where relevant) and, in a sensitive manner, the EY Foundation may suspend the young person from the programme until the allegation is investigated and it is determined whether the young person continues on the programme or is permanently removed.

   The information provided to him/her may need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the local authority children's social care department, the police or the local authority designated officer (LADO). The police and children's social care department may have views on what information can be disclosed to the person.

3. *Is the person at the centre of the allegation working with young people now?*

   If this is the case, the concern needs to be discussed immediately with the Chief Executive of the Foundation or the Chief Financial Officer in her absence and the Child Protection Lead. One of these should then, in a sensitive manner, remove the staff member involved in the allegation from direct contact with young people until the allegation is investigated.

   The information provided to him/her at this stage may need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the local authority children's social care department, the police or the local authority designated officer (LADO). The police and children's social care department may have views on what information can be disclosed to the person.

   If the volunteer, staff or trustee is an EY member of staff, EY HR should be informed.

   If the volunteer, staff or trustee is not an EY member of staff, the Foundation may make a referral to their current employer (where applicable).

3.12 Taking disciplinary action

Where the allegations are particularly serious or there is no doubt, and clear evidence, that an offence has been committed the police and/or children's social care will be informed within one working day of the allegation being reported. A strategy for further action will then be agreed before a decision is taken as to notifying the staff member/trustee/volunteer/young person.

If the initial allegation does not involve a possible criminal offence, the Child Protection Lead and EY Foundation Chief Executive or the Chief Financial Officer in her absence should still consider whether formal disciplinary action is needed.

Where the employer is EY, investigations and disciplinary action will be conducted by the EY HR team. If the volunteer, staff or trustee is not an EY member of staff, the Foundation may make a referral to their current employer (where applicable).

3.13 Talking to parents about the allegation or concern

If the young person's parents/carers do not already know about the allegation, the Child Protection Lead and the LADO need to discuss how they should be informed and by whom.

3.14 Following an allegation

If the allegation is substantiated and if, once the case is concluded, the EY Foundation or EY dismisses the person or ceases to use their services, or the person ceases to provide his/her services, the Child Protection Lead should consult with the LADO about referral of the incident to the Disclosure and Barring Service (DBS). This should take place within a month

Figure 2: Process for Dealing with an Allegation



3.15 Keeping a record of the investigation

All those involved in dealing with the allegation should keep clear notes of the allegations made, how they were followed up, and any actions and decisions taken, together with the reasons for these.

The notes should be signed and dated by the person making them, and the person's name should be printed alongside.

The notes should be kept confidentially on the file of the person who is the subject of the allegation. Discussion should take place with the LADO to determine whether any aspects

of the notes may not be shared with the person concerned. If there are no reasons not to do so, a copy of the records should be given to the individual.

The notes should be held on file in accordance with section 11 of this policy.

4. Online Safety Policy

The purpose of this policy statement is to:

- Ensure the safety and wellbeing of young people is paramount when adults or young people are using the internet, social media or mobile devices
- Provide staff and volunteers with the overarching principles that guide our approach to online safety
- Ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices.

4.1 We recognise that

- The online world provides everyone with many opportunities, however it can also present risks and challenges
- We have a duty to ensure that all young people and adults involved in our organisation are protected from potential harm online
- We have responsibility to help keep young people safe online, whether or not they are using EY's network and devices
- Working in partnership with young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety

4.2 We will seek to promote online safety by

- Appointing an online safety coordinator(s)
- Providing clear and specific directions to staff and volunteers on how to behave online through our behaviour code
- Supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- Supporting and encouraging parents and carers to do what they can to keep their children safe online
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a young person
- Reviewing and updating the security of our information systems regularly
- Ensuring that user names, logins, email accounts and passwords are used effectively
- Ensuring personal information about the adults and young people who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- Providing supervision, support and training for staff and volunteers about online safety

- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation

The name of our online safety coordinator is Shaun Gloc (0141 226 7449).

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

This policy was last reviewed in August 2026.

5. Photography Policy

The purpose of this policy statement is to:

- Protect young people who take part in EY Foundation's services, events and activities, specifically those where photographs and videos may be taken
- Set out the overarching principles that guide our approach to photographs/videos being taken of young people during our events and activities
- To ensure that we operate in line with our values and within the law when creating, using and sharing images of young people

5.1 When taking and using photographs of young people, we will seek to keep young people safe by

- Always asking for written consent from a young person and their parents or carers before taking and using a young person's image
- Always explaining what images will be used for, how they will be stored and what potential risks are associated with sharing images of young people
- Making it clear that if a young person or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published
- Changing the names of young people whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
- Never publishing personal information about individual young people and disguising any identifying information (for example the name of their school or a school uniform with a logo)
- Making sure young people, their parents and carers understand how images of young people will be securely stored and for how long (including how we will control access to the images and their associated information)
- Reducing the risk of images being copied and used inappropriately by:
  - Only using images of young people in appropriate clothing (including safety wear if necessary)
  - Avoiding full face and body shots of young people taking part in activities such as swimming where there may be a heightened risk of images being misused
  - Using images that positively reflect young people's involvement in the activity

6. Whistleblowing Policy

During the course of your engagement with the EY Foundation, you may become aware of conduct which you either know or suspect is unlawful or otherwise unacceptable. You may have noticed the conduct yourself or you may have been contacted by a whistle-blower. The

EY Foundation has a Whistleblowing policy which can be accessed via our website or via the EY Foundation team by emailing enquiries@eyfoundation.ey.com

7. Information Sharing

7.1 Information sharing

EY Foundation recognises that timely information sharing is key to safeguarding and promoting the welfare of young people. We may need to share information for the following reasons:

- We are making a referral to arrange additional support for a young person or their family
- Someone from another agency has asked for information about a young person
- A young person or family has asked to be referred for further help
- A statutory duty or court order requires information to be shared
- We are concerned that a young person or family member may be at risk of significant harm
- We think a serious crime may have been committed or is about to be committed which involves someone in the family
- We will keep a record of why we have shared information about a young person or their family and will ensure we are not putting a young person's safety and welfare at risk by sharing information about them
- We will always seek consent to share information about a young person or their family. However, if consent isn't given, we can still share information with relevant professionals under certain circumstances i.e. if we are protecting a young person from significant harm.

7.2 Sharing information where there may be a safeguarding risk

1.1 Any concerns should also be discussed with the family and if possible, their agreement should be sought, unless this would put the young person at increased risk of significant harm, or if it would undermine any possible criminal investigation. This should be done in consultation with the Designated Safeguarding Lead.

1.2 If the professional needs to share information and cannot get consent they must consider, on the facts of each case, whether it is in the public interest to share all or some of the information they have. The key factors to consider are necessity and proportionality, "i.e. whether the proposed sharing is likely to make an effective contribution to preventing the risk and whether the public interest in sharing information overrides the interest in maintaining confidentiality."

1.3 Some circumstances in which the sharing of confidential information without consent would normally pass the public interest test are:

- "when there is evidence or reasonable cause to believe that a young person is suffering, or is at risk of suffering, significant harm
- to prevent significant harm to a young person, including through the prevention, detection and prosecution of serious crime."

If a professional is unsure of what constitutes "reasonable cause to believe" they should discuss their concerns with their Designated Safeguarding Lead(s). Concerns should always be acted upon and any decision on whether to share information or not should always be recorded.

Any information shared should always be accurate, up to date, shared appropriately and securely: only with the person or people who need to know and limited to information relevant to purpose.

8. Secure handling, storage, retention and destruction of safeguarding records

EY Foundation will process any personal data related to young people in accordance with the Data Protection Act 2018, and any other relevant legislation.

The Data Protection Act 2018 establishes strict rules of good information handling which organisations using personal information are required to observe; these rules are known as the Data Protection Principles and stipulate that personal information should be:

- Used fairly, lawfully and transparently
- Used for specified, explicit purposes
- Used in a way that is adequate, relevant and limited to only what is necessary
- Accurate, and where necessary, kept up to date
- Kept for no longer than is necessary
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorized processing, access, loss, destruction or damage

EY Foundation will process any personal information related to safeguarding children in accordance with these Principles.

We take the security of personal data really seriously, so our Privacy Notice is intended to tell you how the EY Foundation protects your privacy, personal data as well as how your data's processed and stored when you share your information with us. You can use the links below to access our organisations privacy notices:

EY Foundation Privacy Notice: https://bit.ly/EYFountation_Privacy_Notice

Ey.com Privacy Statement: https://www.ey.com/en_gl/privacy-statement

Please note that our EY Foundation Privacy Notice should be read together with the ey.com Privacy Statement and in case of any conflict with this statement, the terms of the EY Foundation Privacy Notice will prevail.

If you have questions or you do not feel that your concerns have been addressed in our privacy statement please email us at enquiries@eyfoundation.ey.com.

8.1 Storage

Any information collected will be stored by EY Foundation electronically in password protected or encrypted documents with sole access to the Designated Safeguarding Leads.

8.2 Accessing your personal information

You have the right to access information that EY Foundation holds about you. EY Foundation's Data Protection Officer is responsible for monitoring compliance with relevant legislation in relation to personal information. You can also contact the Privacy Officer if you have any questions about this privacy notice or our treatment of your personal information: Please email us at enquiries@eyfoundation.ey.com

8.3 Record Retention and Disposal

EY Foundation will only retain personal information related to any safeguarding incidents until a young person reaches the age of 25 (Information and Records Management Society (IRMS), 2016) Any such information will be retained in accordance with EY Foundation retention and disposal policies. After such relevant retention period, any personal information will be destroyed in a secure manner. Exceptions may be made in cases where there are related legal proceedings. For young people that are looked after or adopted then records are subject to statutory requirements and must be kept until their 75th birthday. These records will be clearly marked with the reasons for keeping them for an extended period.

9. Background Checks

9.1 Introduction & Scope

EY Foundation is committed to safeguarding and promoting the welfare of young people and expects all staff, secondees and volunteers to share this commitment.

The EY Foundation is required to ensure that all the employees, trustees, Youth Voice Forum (YVF), volunteers, seconded staff or anyone working on behalf of the EY Foundation in either a voluntary or paid capacity complete background checks to work and volunteer with young people.

If we receive notification that someone is barred from regulated work with children and/or protected adults, the person must be removed from the relevant type of work. This is because it is an offence for an organisation to offer or fail to remove a person who is barred from regulated work after they have been notified.
However, if notified that someone is under consideration for listing in relation to the regulated work type that they do for EYF, EYF Leadership have the right to make their own decision about the action that EYF will take. This is in line with stipulations made in our Vetting Policy.

9.2 Policy Purpose

This policy aims to:

- Define vetting checks to be completed in line with the Safer Recruitment Policy (clause 2.3 of this policy) for new joiners and establish which checks and training the EY Foundation will complete on an ongoing basis for all the individuals subject to this policy;

  Define the responsibilities of all the parties involved in this process;

  Describe the procedures adopted by the EY Foundation to apply this policy;

- Define the process to follow if vetting checks raise concerns for a candidate under offer or an existing individual.

9.3 Duties and Responsibilities

9.3.1 EY Foundation HR Responsibilities

The EY Foundation HR Team is responsible for:

Following up on the onboarding checks with the EY HR Onboarding & EY Recruitment teams;

- Recording accurately the date of completion for Enhanced DBS checks or PVG checks (for new starters based in Scotland);
- Informing the EY Foundation Administrators when we have staff seconded from EY so the Administrators can complete Enhanced DBS checks or PVG checks (for secondees based in Scotland);
- Completing regular audits in order to make sure that Enhanced DBS checks, refreshed Child Protection & DSO training for secondees, trustees, and existing staff are completed in line with this policy;
- Informing the EY Foundation Administrators when to complete enhanced DBS renewal and sending the NSPCC link to the individuals;
- Providing advice to the Leadership Team if any concerns arise from the background checks.

9.3.2 The EY Foundation Administrators Responsibilities

The EY Foundation Administrators are responsible for:

- Conducting and completing all the required checks for volunteers, trustees, YAB, secondees, and existing staff;
- Supporting the EY Foundation HR Team in the completion of the Audit for Enhanced DBS and NSPCC (child protection training) renewals;
- Sending NSPCC (child protection training) links to individuals who must complete the training and make sure that all the training is completed on time;
- Keep up to date the Enhanced DBS and Child Protection spreadsheets.

9.3.3 Leadership Team Responsibilities

The Leadership team is responsible for:

- Leading investigation, completing risk assessments and responding to concerns about the suitability of applicants during the recruitment process when concerns are raised from vetting checks.
- Leading investigation, completing risk assessments and responding to concerns about the suitability of employees or volunteers once they have begun their role when existing individuals subject to this policy no longer meet the required standard.

9.3.4 New Starters, Staff, Secondees and Volunteers Responsibilities

All the individuals subject to this policy must:

- (For the new joiners) Complete the pre-employment checks by actively cooperating with the EY Onboarding Team, the EY Foundation and/or the Third Party Checks Company to complete the pre-screening checks in a timely manner;
- Existing Staff, Trustees, YVF and Secondees have to undertake an Enhanced DBS renewal every two years.
- All the individuals subject to this policy have the duty to identify and share with the EYF HR Team or their Manager any potential issues which may affect their ability to work with young people;

- All the individuals subject to this policy must complete Child Protection Training as part of their mandatory onboarding training. They will have to complete a refresher training in Child Protection every two years, and if they are a Designated Safeguarding Officer the relevant training every two years.
    - Trustees are required to complete the specific safeguarding training for charity trustees, as delivered by NSPCC Learning.

9.4 Vetting checks during the recruitment process

Successful candidates' offers of employment are subject to the satisfactory completion of all the vetting processes that the EY Foundation needs to undertake:

New starters (employees) must undertake the following vetting checks:

Enhanced DBS check;

Employment Verifications (for the latest 5 years);

Right to Work Check;

ID Verification;

Current Address proof verification;

- Education background checks.

Seconded staff from EY complete all the above-mentioned checks when hired by EY, with the exception that they complete a basic DBS. Therefore, once a secondee from EY is appointed to join the EY Foundation, seconded staff will have to undertake an Enhanced DBS check.

Volunteers will complete the following vetting checks:

Enhanced DBS (where required)

9.5 EY Foundation process to follow if future or existing vetting checks raise concerns

If from the vetting checks of an applicant concerns are raised, the following process must be followed:

- The EY Foundation Administrators will need to inform their managers and the relevant member of SMT. The relevant member of SMT will need to bring the matter to the Leadership Team if concerns are related to vetting checks of a volunteer;
- If concerns are raised during the pre-employment checks for future employees or seconded staff, the EYF HR Team has the responsibility to discuss the matter with the Leadership Team;

  The type of concerns will need to be discussed confidentially with the Leadership Team.
- The Leadership Team will need to evaluate if there is any risk in continuing the onboarding of the individual.
- Decisions about whether the individual is allowed to join the EY Foundation, in case of vetting checks raise concerns, should be made on a case-by-case basis.
- The Leadership Team will need to carry out a risk assessment to establish whether they are suitable to work with children and young people.

- If following the risk assessment, it is established that the individual represents a risk for a young person or is unsuitable to work with a young person, it won't be possible for the individual to join the EY Foundation as staff or a volunteer.
- Any information revealed during the vetting or barring check should be kept confidential and disclosed to those involved in the abovementioned process.
- EYF staff who will disclose the abovementioned confidential information to unauthorised individuals might face disciplinary action.
- The EY Foundation will have to discuss any concerns with the candidate and be transparent during the risk assessment process.
- If the vetting and barring check includes additional information that is marked "in confidence", those should not be discussed with the applicant. This could compromise a criminal investigation or another person's safety and may constitute a criminal offence under the Police Act 1997.
- The Leadership team will reach objective decisions based on the investigations and the results of the risk assessment. Decisions will be in writing and stored in line with the UK Records Retention Schedule | Discover (ey.net)

9.5.1 Enhanced DBS check recording and monitoring for staff, secondees, trustees, YVF and volunteers

The EY Foundation won't store any copy of the individual Enhanced DBS check.

We will record the following information in a spreadsheet saved in a folder with limited access:

The date the check was completed;

The reference number of the certificate;

- The decision made about whether the person was employed (with reasons). For employees and secondees, this information will be accessible only to the EYF HR Team and the Leadership Team;
- The renewal date for the Enhanced DBS.

9.6 Safeguarding Policy & Training

1.3.1 As per clause 2.3 of the EY Foundation Safeguarding Children and Adults at Risk of Harm Policy, all our volunteers, staff, trustees, and seconded staff will have to complete mandatory Child Safeguarding Training via an online provider within 2 weeks from the date they join the EY Foundation.

1.3.2 All the individuals subject to this Policy will also have to read, familiarise and understand the EY Foundation Safeguarding Children and Adults at Risk of Harm Policy and sign the relevant Acknowledgment Form.

1.3.3 The EYF HR Team will conduct a regular audit to make sure that existing staff and secondees will complete safeguarding children training every 2 years;

1.3.4 EYF staff and secondees who fail to complete safeguarding children training may face disciplinary actions;

1.3.5 The EYF Administrators and the EYF HR Team are responsible for duly recording the data confirming completion in the Safeguarding Training tracker and keeping the tracker up to date;

9.7 Level 3 DSL Training for the EY Foundation Designated Safeguarding Leads

The EY Foundation will identify the staff and Trustees who should complete the Level 3 DSL Training based on the nature of their roles.

The Designated Safeguarding Leads will have to complete a re-fresh training of the Level 3 DSL every 2 years.

The EYF HR team will complete regular audits and inform the relevant employees when it is time to renew their Level 3 DSL training.

9.8 Enhanced DBS checks for existing staff, seconded staff, trustees, YVF and volunteers

The EY Foundation is committed to completing every two years Enhanced DBS checks for the existing staff, seconded staff, trustees, YAB and volunteers via the Disclosure and Barring Service.

9.9 Confidentiality

All the information provided by the individual subject to this policy will be kept confidential in accordance with the terms of the UK Records Retention Schedule | Discover (ey.net).

The EYF employees who will be involved in vetting checks and audits must keep confidential all the information about the results of those checks.

All the individuals subject to this policy consent to share with EY Foundation, to the extent necessary, any personal information (as per Data Protection Act 1988) and confidential information to undertake the checks required by this policy and for the related purposes of this policy.

9.10 Amendments

The EY Foundation Safeguarding Children and Adults at Risk of Harm Policy do not form part of EY Foundation employees' contract of employment. The EY Foundation reserves the right to change or terminate the terms at its absolute discretion. This policy will be reviewed annua

10. Appendix A: Safeguarding Concern Report Form

Safeguarding Concern Report Form	
Incident or concern reported by:	
Job title:	
Report date:	
Report summary	
Name of young person:	
Date of Birth:	
Are you reporting your own concerns or passing on those of somebody else? (If somebody else, please include their name and contact details)	
Date and time of disclosure or concern/incident reported:	
Location of disclosure or concern/incident reported:	
Give a brief account of the disclosure or concern/incident reported, including the observed harm/abuse, time, dates, names, locations, a description of any visible injuries (if any) or any other relevant facts:	
Action taken, including the name and details of anybody you have consulted:	

Signed .....

Date .....