



SAFEGUARDING

Policy
2025/26

Policy Statement

It is the Policy of The Rock Project to safeguard the welfare of all children, young people and adults at risk is paramount and that *all* have equal rights of protection. We have a duty of care when they are in our charge, and we will do everything we can to provide a safe and caring environment whilst they attend our activities. The Rock Project understands that individuals thrive in safe surroundings so we are committed to ensuring that our sessions are enjoyable for everyone involved and that safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and The Charity Commission requirements.

Equal Opportunities statement:

We recognise that anyone can become subject to discrimination, harassment or victimisation because of:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Comments and actions that contribute to discrimination, harassment or victimisation are not acceptable and will be challenged. Such incidents will be recorded and shared with parents and carers, and the relevant agencies when necessary and appropriate.

We will:

- ✓ treat everyone with respect and celebrate their achievements,
- ✓ carefully recruit and select all staff whether paid or unpaid,
- ✓ respond to concerns and allegations appropriately.

When there are concerns about the welfare of any, child, young person or adult at risk, all responsible adults in our organisation are expected to share those concerns, without delay, with the Lead for Safeguarding (or the Deputy, if the Lead is unavailable).

Our policy is approved by our senior management and will be reviewed and updated annually. We will publish and promote this policy to all staff, paid or unpaid, including franchisees, session managers, tutors and any work experience students through induction, training and supervision. We endeavour to disseminate, as appropriate, this policy to all who come into contact with The Rock Project e.g., children, young people, adults at risk, their parents, carers, families and others.

Policy Aim

As members of SAFEcic, we aim at all times to attain best safeguarding practice throughout all our activities with children, young people, adults at risk, their parents, carers and/or families. We endeavour to provide a safe and friendly environment and celebrate all achievements.

Additionally, no one should come to any harm through their contact with our organisation and, as part of that commitment, we do everything we can to ensure everyone feels safe and protected from any form of harm, abuse and neglect regardless of their role.

We will achieve this by adhering strictly to this policy, guidance and risk assessments. Each franchisee within our organisation holds current Public Liability Insurance which covers all our activities.

Safeguarding Personnel

Lead and Deputy for Safeguarding

Our Lead for Safeguarding is:

Name: Ben Tiffin

Job role: Franchisee for South Wales / Designated Safeguarding Lead

Contact details: safeguarding@therockproject.com

Our Deputy for Safeguarding is:

Name: Sam Fry

Job role: Franchise Director

Contact details: sam.fry@therockproject.com

Their role is to oversee and ensure that our safeguarding policy, which includes Online Safety, is fully implemented and that we attain SAFEcic standards.

Their responsibilities are:

- ✓ monitoring and recording concerns
- ✓ making referrals to social care, or police, as relevant, without delay
- ✓ liaison with other agencies

The Deputy for Safeguarding should be available to support or cover for the Lead. S/he will also handle any complaints or allegations against the Lead for Safeguarding if appropriate. It is important that the Lead and Deputy for Safeguarding are unconnected.

Why do we need a Safeguarding Policy?

All organisations that work or come into contact with children, young people and/or adults at risk need to have safeguarding policies and procedures in place.

Government guidance is clear that all organisations working with children, young people, adults at risk, parents, carers and/or families have responsibilities for safeguarding. It is important to remember that children, young people and adults at risk can also abuse and that such incidents fall into the remit of this policy.

To undertake these responsibilities, we:

- have senior managers, franchisees, session managers and tutors that are committed to safeguarding
- are clear about peoples' responsibilities and accountability
- have a culture of listening to children, young people and adults at risk
- undertake safer recruitment practices for all staff and volunteers working with children & young people and adults at risk
- have procedures for safeguarding children and young people and adults at risk
- have procedures for dealing with allegations against, and concerns about, any staff
- make sure staff, paid and unpaid, have an induction and further safeguarding training, supervision, and support

Related Policies

Data Protection

We will treat any personal information by which an individual can be identified, for example, name, address, and email, in accordance with the provisions of Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR) and will not share information with any third party, except where required by law.

Confidentiality

This policy is in line with government guidance about confidentiality and these details will be made available to all staff, children, young children, adults at risk, parents and carers.

We fully endorse the principal of the welfare of children, young people and adults at risk, overriding any obligations of confidence we may hold to others. No one working, or involved, with our organisation can promise absolute confidentiality. Individual cases will only be shared or discussed on a "need to know" basis.

Whistleblowing

Whistleblowing is when someone raises a concern externally about a person or practice within the organisation, which will affect others in an illegal and or harmful way.

Our organisation promotes the sharing of any concerns regarding the safeguarding of children, young people and adults at risk as soon as possible with the Lead or Deputy for Safeguarding.

If individuals reporting their concerns within our organisation do not feel they have been acted upon then we support their right to report these concerns to the Local Authority Designated Office (LADO) (England and Wales only) social care services, the police, and any other regulatory authority. They can also contact the [NSPCC dedicated helplines](#) and the charity [Protect](#) for advice and support.

All media enquiries will be handled by Sam Fry, franchise director.

Information Sharing

Timely and accurate written records play an essential role in safeguarding individuals, who may have suffered, are suffering or at significant risk of suffering harm. It is important that records are shared at the appropriate time when necessary. Within our organisation the decision to share written information, and with whom, will be undertaken by the Lead or the Deputy for safeguarding.

Safer Recruitment

The Rock Project is committed to safe recruitment in line with the relevant legislation and guidance from the government for recruiting all staff, paid or unpaid. We do this by:

- advertising vacancies with a clear commitment required to safeguarding
- assigning all posts detailed job descriptions
- **obtaining full personal details via an application form (not CVs) with particular relevance to previous work with children, young people and adults at risk**
- when a candidate is selected for interview the relevant criminal declaration form will be sent for completion as set out by the Rehabilitation of Offenders Act 1974, as amended
- always taking up two written references, one from the most recent employer or education establishment
- undertaking all interviews face to face, based on the job description
- having sound procedures and recording for interviewing to ensure we are satisfied, and can evidence that the applicant is appropriate and suitable

Any appointment will only be confirmed subject to:

- ✓ a satisfactory ID and criminal records check at the appropriate level, including [Certificates of Good Conduct](#) for foreign nationals and the [International Child Protection Certificate \(ICPC\)](#) for anyone who works with children and has lived in the UK and also travelled overseas
- ✓ a follow up of written references by telephone if relevant to the vacant post
- ✓ a check of essential qualifications and any specific professional details
- ✓ confirmation of the [Right to Work in the UK](#) for employed personnel
- ✓ fitness to work as relevant

Induction and Training

We have a clear induction and training strategy with clear job descriptions and responsibilities and all relevant procedures. All new staff, paid and unpaid, will receive induction training as soon as possible and sign to record they have:

- received and understood this policy.
- been given any relevant resources
- understood the commitment to safeguarding

When needed, staff will receive safeguarding training, at the appropriate level, as soon as possible. Updated safeguarding training is normally required every 2 years (online) or three years (face to face). Staff working directly with at risk groups will also undertake the free online government training for PREVENT Channel and FGM

Working Practices

Consent

When consent is required for any care, activity or intervention we will, unless it is an emergency, obtain consent from the individual if of sufficient age and or understanding.

Where relevant, we will ensure we fulfil our obligations under Child Care Law in terms of parental responsibility and Mental Capacity Legislation on supporting, where possible, the individual's right to make their own decisions. Any decisions made should be the least restrictive and recorded.

Staff Ratios to Children, Young People and Adults at Risk

There must always be a minimum of two responsible adults present for any activities.

Lone and One to One Working

We will avoid lone working, one to one working with children and adults at risk whenever possible to protect both individuals. A risk assessment will always be undertaken to ensure:

- ✓ the activity provided is suitable for one-to-one working,
- ✓ the lone worker has been recruited, trained and supervised to undertake this particular role
- ✓ that health and safety issues have been identified and recommendations followed
- ✓ safeguards are in place to protect individual's rights to safe working practice

Young People who work in our Organisation

All young people who are undertaking volunteer work or work experience within our organisation/group are to be included within this policy and their safeguarding as individuals given the same importance as all young people we come into contact with. Any disclosures,

observations of possible harm or disturbing behaviour must be reported to the Lead or Deputy immediately.

They will also require an induction program that includes their commitment to safeguarding within the remit of the safeguarding policy and in line with all staff induction.

In addition, information on the young person's contacts recorded as relevant e.g. parents, carers, school representatives and any supervisors, with emergency contact numbers.

We will check with the relevant local authority's education welfare team to see if an employment permit is required for any young people working with us and, in the cases of live performances, if a child performance licence is required.

Codes of Conduct

We aim to provide a safe environment free from discrimination, upholding and promoting equality, diversity and inclusion. We undertake to:

- ✓ treat all children and young people and adults at risk with respect and dignity
- ✓ ensure that their welfare and safety is paramount at all times
- ✓ maintain professional boundaries both face to face and online
- ✓ always use the organisation's official email system, social media etc when contacting the at risk groups that we work with
- ✓ always listen to individuals and take account of their wishes and feeling
- ✓ always act in a professional way and not accept bullying, swearing or other disruptive behaviour
- ✓ liaise openly with parents and carers
- ✓ only use physical contact if absolutely necessary
- ✓ avoid being alone with children, young people and adults at risk whenever possible
- ✓ listen to, and act upon, any disclosures, allegations, or concerns of abuse
- ✓ participate in approved safeguarding training at appropriate levels
- ✓ follow our safeguarding policy at all times
- ✓ make activities fun and enjoyable

Recognising Abuse in Children Young People and Adults at Risk

The following list is for guidance only. It is important to be observant, listen to what is being said and record. e.g. is what you are observing and being told about an injury consistent with the injury?

- Abuse related to faith or belief
- Alcohol and Substance misuse
- Breast Ironing
- Carrying offensive weapons
- Child criminal and sexual exploitation including County Lines
- Child on child abuse, including sexual violence and upskirting
- Concealed pregnancy
- Criminal exploitation
- Discriminatory
- Domestic abuse, including "honour" based abuse
- Emotional
- Exploitive use of technology
- Female Genital Mutilation (FGM)
- Financial or material abuse
- Forced marriage
- Gangs
- Gambling
- Hate and "mate" crime
- Hazing and initiation rites
- Hoarding
- Modern slavery
- Neglect and acts of omission
- Online safety
- Organisational or institutional
- Psychological
- Physical
- Radicalisation
- Self-neglect
- Sexual
- Sextortion
- Trafficking

Handling Disclosures

When a disclosure is made by a child, young person or adult at risk it is important to remember to:

- take what you are being told seriously
- stay calm and reassure
- do not investigate
- do not delay

and always

- seek advice from the Franchisee, Lead or Deputy for Safeguarding
- make a careful recording of anything you are told or observe, date and sign.

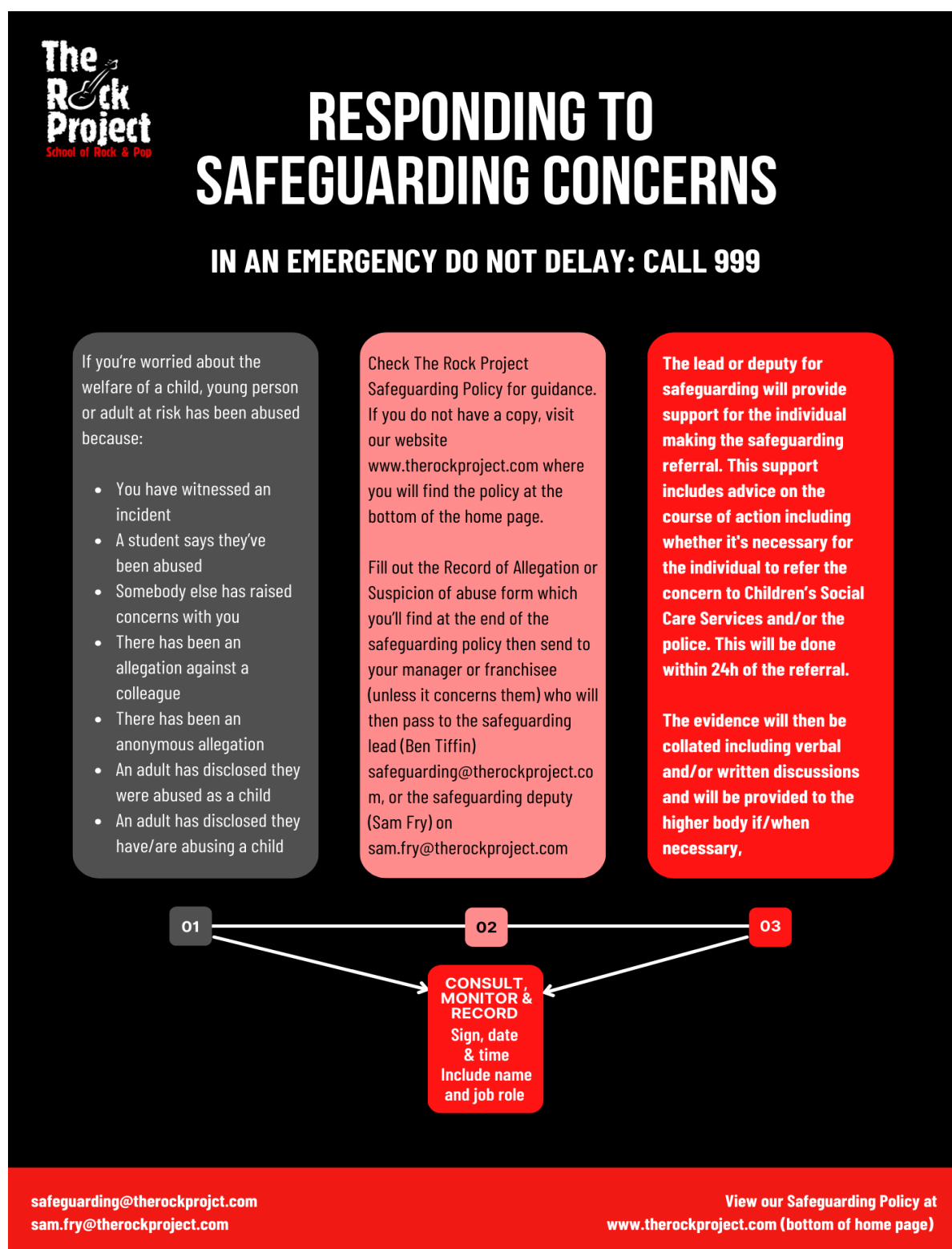
A disclosure may come from someone telling you:

- they have or are being abused
- they have concerns about someone else
- they are themselves abusing or likely to abuse someone else

Responding to Concerns

Safeguarding Referral Flowchart

We ensure and emphasise that everyone in our organisation understand and know how to share any concerns immediately with the Lead or Deputy for Safeguarding. Everyone, including the Lead, Deputy and Additional Senior Lead for Safeguarding, will deal with concerns using the following:



Record Keeping

At all times when required, and especially where there is a safeguarding concern, we are committed to keeping records which are:

- recorded on a safeguarding incident form
- of sufficient details of child, young person or adult at risk to identify individual who is subject of concern and any significant others
- accurate and factual/based on fact, as a true record of:
 - o what has been monitored/observed
 - o what has been said and by whom
 - o what has given cause for concern
 - o what action has and/or will be taken including the reason for those actions
 - o the reason stated for no action being taken and by whom
- non-judgmental
- timely within 24 hours
- shared as appropriate by the Lead or Deputy for Safeguarding
- stored safely and securely by the Lead or Deputy for Safeguarding

Handling Allegations / Dealing with Complaints / Disciplinary & Grievance Procedures

Our policies and procedures are in line with the statutory guidance, our disciplinary, complaints and grievance procedures. These will be made available to everyone.

Where a complaint or allegation has been made with regards to any inappropriate behaviour or poor practice, the Lead or Deputy will, in all cases, discuss the situation with social care services (the LADO with regards to children England and Wales only) and / or the police before making an open decision about the best way forward.

In the case where the Lead is implicated, the Deputy should be informed. If there is a belief that the concern has not been taken seriously or acted upon then any one can “Whistleblow”

With regards to disciplinary and grievance procedures, we will take no steps until we have fully discussed and agreed a strategy with social care services and / or the police, (the LADO, with regards to children England and Wales only). Any investigation will override the need to implement any such procedures. Our management are responsible for making referrals to the relevant:

- Criminal records service
- Regulatory Authority
- Professional body

Bullying, Harassment and Sexual Harassment

Bullying and harassment and sexual harassment can take many forms and include:

- physical violence including threats, verbal assaults and taunts, the destruction of property, extortion, unwanted sexual interest or contact
- indirect forms of bullying including ignoring a person and the withdrawal of friendship, malicious gossip and spreading rumours, abusive or oppressive graffiti, the use of social media, electronic messages and websites.
- motivation of prejudice against certain groups for example on the grounds of race, religion, gender and disability

Whether directed at children, young people, adults at risk, staff, volunteers, parent and carers, bullying and harassment, and sexual harassment, physical, sexual and/or emotional abuse will

not be tolerated. All such behaviour will be treated as a safeguarding concern when aimed at children, young people and or adults at risk. If children, young people and/or adults at risk are engaging in bullying, harassment or sexual harassment it is also a safeguarding concern and should be reported to the Lead or Deputy for safeguarding.

We will:

- provide a culture of equality and respect for all with zero tolerance to any form of bullying, harassment or sexual harassment.
- report all incidents of bullying, harassment or sexual harassment observed or disclosed, to the Lead or Deputy who will take the appropriate action
- take immediate steps to stop the behaviour and mitigate the effects of bullying, harassment and sexual harassment.
- record all incidents with observations and witness statements, and action taken, signed, timed and dated

For more information on how we handle bullying within The Rock Project, please see our Anti-bullying policy on the home page of our website.

Online Safety

Why do we need to include Online Safety?

Modern digital technology has made access to information and communication increasingly easy for everyone. This is especially so for those who cannot always go out to socialise and rely on websites for social networking, watching films, downloading music, buying lottery tickets, shopping etc. Government guidance is clear, that all organisations working with children, young people, adults at risk, families, parents and carers have responsibilities. It is also important to remember, children, young people and adults at risk can also abuse and such incidents fall into the remit of this policy

Online Safety Code of Conduct:

We expect everyone in our organisation to agree and sign up to our Online Safety code of conduct to:

1. use the internet and other forms of communication in a sensible and polite way.
2. only access websites, send messages or access and use other resources that will not hurt or upset anybody.
3. seek permission if they want to use personal information or take photographs of other people.
4. report any concerns to the Lead or Deputy
5. not maintain confidentiality if there is a concern about the welfare of a child, young person or adult at risk.

What are the Risks?

There are many potential risks including:

- accessing inappropriate or illegal websites.
- receiving unwanted or upsetting texts, e-mail messages or images.
- being “groomed” by another with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs or crime.
- sharing nudes or semi nudes.
- viewing or sending unacceptable material such as inciting hatred or violence.
- sending bullying messages or posting malicious details about others.
- ignoring copyright law by downloading e.g. music, videos, homework cheat materials etc.
- overspending on shopping and gambling sites.
- being at risk of identity fraud for money transactions.
- inappropriate relationships or prostitution.

What else might be of concern?

A child, young person or adult at risk who:

- is becoming secretive about where they are going to or who they are meeting.
- will not let you see what they are accessing online.
- is using a webcam in a closed area, away from other people.

- is accessing the web or using a mobile for long periods and at all hours
- clears the computer history every time they use it.
- receives unexpected money or gifts from people you don't know.
- does not appear to have the money they should have.

A person who:

- befriends a child, young person or adult at risk on the internet or by text messaging.
- has links to children, young people and/or adults at risk on their social media pages especially if they work in a position of care such as a sports coach or care worker.
- is secretive about what they are doing and who they are meeting.

Social media

The Online Safety Act 2023 and associated government guidance A Guide to the Online Safety Bill now makes social media companies more responsible for their users' safety on their platforms. This means children and adults will be protected online by making social media platforms:

- remove illegal content quickly or prevent it from appearing in the first place. This includes removing content promoting self-harm
- prevent children from accessing harmful and age-inappropriate content
- enforce age limits and age-checking measures
- ensure the risks and dangers posed to children on the largest social media platforms are more transparent, including by publishing risk assessments
- provide parents and children with clear and accessible ways to report problems online when they do arise

Such content should be reported to the service provider and if they do not respond appropriately the matter can be reported to Ofcom.

IT IS IMPORTANT TO FOLLOW THE STEPS BELOW FIRST WHENEVER ANYONE IS AT RISK OF HARM

What do I do if I am concerned?

If you have any concerns, speak to the Lead or Deputy for Safeguarding.

Remember:

- do not delay.
- do not investigate.
- seek advice from the Lead or Deputy
- make careful recording of anything you observe or are told

ONLINE SAFETY REFERRAL

Flowchart
Child and Adult

When illegal content or activity is found or suspected, if an emergency dial 999, always inform your Lead or Deputy for safeguarding and they will follow these steps. If the Lead or Deputy are not available, you must take action.



www.therockproject.com

August 2024

Minimising the Risks

We will:

- talk to children, young people and adults at risk about what they are accessing online.
- ensure everyone uses PCs, iPads and other technology in a general space where we can monitor what is going on.
- explain the risks of giving out personal details online.
- talk about how people can be anyone they want to be online, e.g. by using misleading emails, photographs of other people, telling lies about their age, hobbies, school.
- encourage children, young people and adults at risk to think carefully about what photographs or videos they use online. They can be used and tampered with by other people, or they may not be appropriate.
- advise children, young people and adults at risk to only text, chat or webcam to people they know in real life.
- talk about how to identify SPAM messages or junk mail and how to delete them. This also applies to messages from people they do not know, or opening attachments.
- discuss how people hide their identities online and the importance of never meeting new online “friends” in real life.
- make sure children, young people and adults at risk understand they can always talk to us, or their parents and/or carers, about anything that makes them feel uncomfortable.
- look on the internet together for information about how to deal with or report problems. e.g. [The National Crime Agency's CEOP Education](#)
- talk about how/when information or images get on to the internet, they can never be erased.

Other useful resources can be found at [Ofcom](#)

Safeguarding Practical Guidance

Photography & Filming Guidance

Both still and moving images are key to recording the successes and achievements of children, young people and adults at risk in their lives and activities. However, it is vital to remember that images (especially digital images) can be used, shared, stored and/or distributed inappropriately, and that their storage and use must comply with the UK GDPR.

It is therefore important to be clear about:

- explaining to parents and carers why caution is necessary
- the purpose of images e.g. parent's and carer's own record, media and publicity etc
- the content required when using a professional photographer
- informing parents and seeking their consent for any publication or media use
- publishing only necessary identifying details alongside individual's photos in newspapers, websites etc
- taking photographs openly and away from sensitive areas (changing rooms, toilets, etc)
- the suitability of clothing e.g. swimsuits
- any group photos being taken only during the activity or on the premises
- all those taking photos signing a registration form, which also identifies the purpose and use of any images
- ensuring secure storage of all images
- identifying how long unused images will be retained
- identifying how long copies of published images will be retained

The above guidance applies to all still and moving images, however they are created (mobile phone, still camera, video camera etc). The type of equipment and the equipment's owner should also be recorded on the registration form.

Activities, Events and Visiting Speakers/Activity Leaders

We will always ensure visitors and activities undertaken are risk assessed and we are committed to:

- ensuring that those who run activities have the expertise, knowledge and skills to do so properly
- completing a risk assessment which involves identifying risks and the means of reducing or eliminating those risks for all activities or events
- risk assessing any changes being made to activities or events involving children, young people and adults at risk
- having a written plan in place if the event or activity has to be cancelled
- having a written plan in place in case of emergency including contact numbers
- implementing the required actions identified by the risk assessment process and reviewing the effectiveness of these on a regular basis

The Late Pick Up of a Child, Young Person or Adult at Risk

If attempts to contact the parent and nominated emergency contact fail, then the supervising adult should wait with the child, young person or adult at risk with other staff, volunteers or parents wherever possible.

Staff, paid and unpaid, should avoid:

- taking the child, young person or adult at risk home or to another location
- waiting alone with the child, young person or adult at risk in a vehicle or at the venue
- sending the child young person or adult at risk home with another person, without parental consent
- leaving the child young person or adult at risk alone

If all attempts to make contact fail, it may be advisable to contact the police for advice.

Child, Young Person or Adult goes Missing

If a child, young person or adult at risk goes missing from the group or organisation it should be reported to the police. Use 999 where there is a concern that they cannot be found or are vulnerable.

A missing person may be assessed as 'at risk' if they fit one or more of the following categories.

- is under 16
- has expressed feelings of suicide
- has dementia
- has been acting totally out of character
- has mental health issues
- is under increased stress
- has an illness or a physical disability
- has a learning disability
- is in need of regular medication/care

The Lead or Deputy for Safeguarding should be informed as soon as possible, and all details and actions recorded, signed, timed and dated.

First Aid

Our First Aiders have completed specific training as set out by the Health and Safety Executive (HSE). They hold valid and up to date certificates of competence issued by an organisation whose training and qualifications are approved by the HSE.

The duties of a First Aider are:

- to give immediate First Aid to children, young people, adults at risk, staff or visitors when needed
- to ensure that an ambulance or other professional medical help is called when necessary

Our franchisees ensure there is always a trained First Aider on site at our venues or, if other venues used such as schools, that they have appropriate first aid cover.

All incidents will be reported and recorded in the First Aid and Incident Accident Books

Buildings and Venues

Safeguarding risk assessments will be carried out on all building and venues used by The Rock Project or by the host's venue management, such as schools.

The safeguarding risk assessment should cover:

- access especially how people enter and leave the building
- registration protocol
- use of keys
- toilets and changing rooms
- any outside space
- car parks
- any other relevant issues

This policy was agreed and disseminated on 1st September 2025 and will be reviewed annually or when there are substantial organisational changes.

Policy Review Date: 1st September 2025

Signed:

Lead for Safeguarding: 

Deputy for Safeguarding: 

Date: 1st September 2025

Date of next review: 1st September 2026



Record of Allegation or Suspicion of Abuse

Initial report to: _____

Date: _____ Time: _____

Name of Complainant	Name and contact details of Child / Young Person / Adult in a vulnerable situation	Place of alleged abuse

Name(s) _____ of _____ people _____ present:

Details of Allegation or Suspicion

Please give as much information about the allegation or suspicion, including if you suspect abuse, what alerted your attention to the situation? Please include the names of all of the people involved.

Name of person reporting incident (in capitals) _____

Signed: _____ Date: _____

Session location: _____

Email address: _____

Please return this form to The Rock Project Safeguarding Lead at your first opportunity