

The Wren Project Safeguarding Policy

Summary

The Wren Project commits to maintaining the confidentiality of our Wrens. We provide everyone over the age of 18 the space to talk about stressful, emotional, and difficult subjects in the understanding that anything shared will stay confidential within the Wren Project.

Safeguarding adults is about the safety and well-being of all those who use our services, and the provision of additional measures for those least able to protect themselves from harm or abuse. Safeguarding adults is a fundamental part of any safety and wellbeing for organisations that offer support and anticipate health benefits/outcomes.

Good safeguarding involves three principles which are set out in the policy and underpin Wren documentation:

1. Empowerment and self-determination: supporting others to make their own decisions.
The Wren Project seeks to empower people to address their own risk.
2. Proportionality: focussing on the least intrusive response, directed by the Wrens, appropriate to the risk presented.
3. Accountability: operating with transparency. We understand that risks do occur and take every incident seriously and do not downplay any issues.

The Wren Project believes that regular listening support provided by trained volunteers can help relieve the emotional pain and stress of people living with autoimmune disease. The Wren Project offers listening support to people diagnosed with autoimmune disease and in a period of significant distress with their management of their disease.

Volunteers are highly trained in active listening, and supported by experienced supervising volunteers, to provide a befriending, listening service to participants (Wrens); volunteers provide ongoing, one to one support in which participants can speak, feel heard and talk about their experiences. We aim to: reduce loneliness, reduce distress and improve resilience. Volunteers will be trained to recognise the limits of their role, particularly emphasising that they are not qualified to provide medical advice. Following training, volunteers will be able to identify when they are not equipped to handle a situation and when it should instead be escalated to their Volunteer Supervisor.

The Wren Project commits to maintaining the confidentiality of our participants. We provide everyone the space to talk about stressful, emotional, and difficult subjects in the understanding that anything shared will stay confidential within the Wren Project. We take seriously the fact that we are compliant with the General Data Protection Regulations (GDPR). Everything shared and discussed in the Wren Project is completely confidential. This message is communicated to Wrens on referral calls, and reiterated in the Information Sheet which is sent to Wrens before they begin sessions. Maintaining confidentiality is a key part of our model and helps encourage Wrens to openly discuss, examine and reflect on their situation.

This policy sets out our safeguarding standards, the expectations of our staff and volunteers if/when concerns are reported, or observed by another volunteer or staff member, and how we look to continuously learn and improve our safeguarding practice.

Designated Safeguarding Officer (DSO)	Phoebe Welsh
Policy owner and lead	Kate Middleton, CEO
Audience	All of our people (defined by 4.1)
Formally endorsed by	Board of Trustees Deputy Chair and Trustee Safeguarding Lead: Kerry Ryan
Reviewed	6 monthly basis

Last Review	31st January 2023
Next Review	July 2023

1. Introduction

- 1.1. Everyone who engages with us has a right to be safe from harm and abuse and neglect. This includes our people and people we seek to support and anyone who has contact with us, including the children of adults working with the Wren Project.
- 1.2. We work with adults, aged 18 and over only. Safeguarding concerns relating to children will be dealt with following the Child Protection legal guidance. <https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>
- 1.3. We believe everyone has a responsibility to promote the welfare of all people, to keep them safe and to practise in a way that protects them.
- 1.4. We are committed to being transparent in our safeguarding work and strive for the highest standards of safeguarding and protection.
- 1.5. We will give equal priority to keeping all people safe regardless of their age, disability, gender, race, religion or belief, sex, or sexual orientation.
- 1.6. We expect our people to understand their responsibilities, and to know how to respond when they have a safeguarding concern, or a safeguarding concern is raised.
- 1.7. We uphold a person-centred approach to safeguarding ensuring that every individual has a right to be heard and safe. We believe in self-determination for everyone we work with, and seek whenever possible to empower people to address, or at a minimum express to us, their own risk.
- 1.8. We take every incident seriously and do not downplay any issues.
- 1.9. We look to continuously learn from incidents reported to us as part of our efforts to improve and reinforce our safeguarding culture. We seek to work preventatively and have robust procedures in place to respond to safeguarding concerns effectively.

2. Purpose

- 2.1. To safeguard and promote the wellbeing of everyone with whom the Wren Project works.
- 2.2. To ensure that all employees and volunteers understand the context within which checking with the Disclosure and Barring Service takes place.
- 2.3. To provide all employees and volunteers with guidance on how they should behave if they suspect any safeguarding issue.
- 2.4. To guide all our people (4.1) on how to respond to - and report - concerns.

- 2.5. To ensure compatibility with other Wren Project policies.
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3. Legal Guidance
 - 3.1. Human Rights Act 1998
<http://www.legislation.gov.uk/ukpga/1998/42/contents>
 - 3.2. Mental Health Act 1983 & 2007
<http://www.legislation.gov.uk/ukpga/2007/12/contents>
 - 3.3. Disability Discrimination Act 1995
<http://www.legislation.gov.uk/ukpga/1995/50/contents>
 - 3.4. Mental Capacity Act 2005
<http://www.legislation.gov.uk/ukpga/2005/9/contents>
 - 3.5. Safeguarding Vulnerable Groups Act 2006
<http://www.legislation.gov.uk/ukpga/2006/47/contents>
 - 3.6. Health and Social Care Act 2008
<http://www.legislation.gov.uk/ukpga/2008/14/contents>
 - 3.7. Care Act 2014
<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

 4. Who does this policy apply to:
 - 4.1. This policy applies to “our people:” all paid employees, seconded staff, trustees, volunteers, mentors and unpaid staff working on behalf of the Wren Project in any capacity and in any setting.
 - 4.2. This policy does not apply to anyone under the age of 18. As mentioned in point 1.2, safeguarding concerns relating to children will be dealt with following the Child Protection legal guidance.
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
 - 4.3. The Wren Project only supports adults who we assess can take responsibility for their actions. This will not include Wrens who may at some point become unable to make decisions under the Mental Capacity Act 2004.

5. Vulnerable Adults

5.1. The Care Act (2014) guidance describes safeguarding as: *'protecting an adult's right to live safely, free from harm and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.'* This includes anyone who is:

- Aged 18 and over;
- Has needs for care and/or support (whether the authority is meeting any of those needs);
- Is experiencing or is at risk of abuse or neglect;
- As a result of those needs is unable to protect themselves against the abuse or neglect.

5.2. The Wren Project only supports adults who we assess can take responsibility for their actions. This will not include those potential Wrens unable to make decisions under the Mental Capacity Act 2004.

5.3. Living a life that is free from harm and abuse is fundamental to the human rights framework and an essential requirement for health and wellbeing.

6. Safeguarding Standards

We uphold a person-centred approach to safeguarding ensuring that every individual has a right to be heard and safe. We believe in self-determination for everyone we work with, and seek whenever possible to empower people to address, or at a minimum express to us, their own risk.

6.1. Standard 1: We will support adults to make their own informed safeguarding decisions in line with this policy, safeguarding and capacity legislation including Care Act and Working Together. We believe and promote self-determination. The Wren Project seeks whenever possible to empower people to address their own risk.

6.2. Standard 2: we will respond effectively when our people have safeguarding concerns. We will work preventively with a person-centred and self-deterministic

approach. We will listen to the person in concern and discuss with them to take actions for themselves.

- 6.3. Standard 3: we will support and monitor all reported safeguarding concerns, and actively look to learn from how we have handled reported concerns and incidents as part of our commitment to continuous improvement.
- 6.4. Standard 4: we take our safeguarding responsibilities seriously and have a consistent approach to agreeing and defining how we meet our responsibilities.

7. Behaviour

- 7.1. Safeguarding is the responsibility of all our people (defined by 4.1). We expect our people to take seriously and follow up any safeguarding concern that comes to their attention, including referring this to safeguarding colleagues as appropriate and create an environment where individuals feel enabled and supported to come forward with any reports, concerns or allegations.
- 7.2. All our people will be required to read the Wren Project's safeguarding summary which is a summary of this policy, and to sign a copy of the policy summary to indicate they have read it in full. They should highlight and discuss any issues requiring clarification and any training issues with the Volunteer Manager, Line Manager or the Safeguarding Lead.
- 7.3. All volunteers and employees will have appropriate employee checks in place which must include a full career history, identity checks and references and adherence to Disclosure & Barring Service (DBS).
- 7.4. Should a volunteer or employee be unable to obtain a DBS check (for example if they are international), the Wren Project requires:
 - Three references; one from a previous employer (within the last 3 years) and two-character references
 - Passport or other form of identification.
- 7.5. We expect all our people to act with integrity as professional representatives of the organisation. We expect our people to understand how their personal behaviour affects the people who use our services.
- 7.6. Volunteers will be trained to recognise the limits of their ability, particularly emphasising that they are not capable nor qualified to give any medical advice.

Following training, volunteers will be able to identify when they are not equipped to handle a situation and when it should instead be escalated.

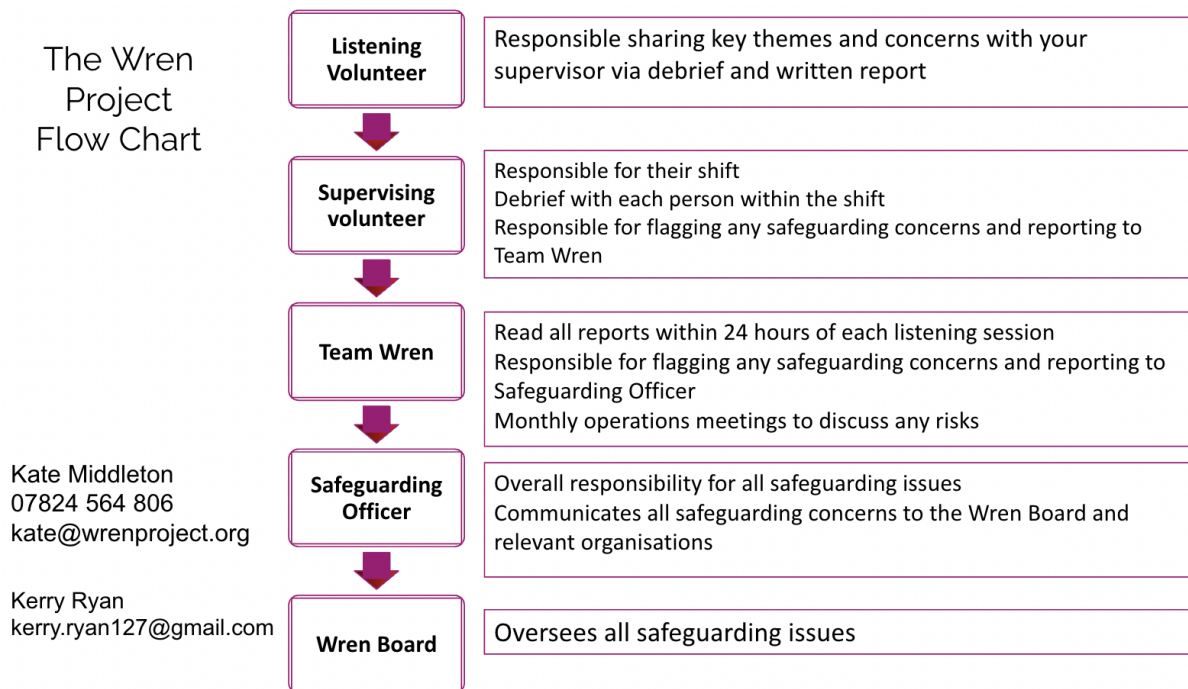
- 7.7. Volunteers are expected to act in line with the Volunteer Agreement Form which outlines the codes of conduct and affirms the core values and principles of the Wren Project. The Code confirms we will not tolerate harassment, bullying, abuse, discrimination, exploitation or violence. The Volunteer Manager is responsible for ensuring all volunteers are working to the standards of the Wren Project, outlined by the Volunteer Agreement Form.
- 7.8. Breaches of the Code including those relating to safeguarding are taken very seriously, and appropriate disciplinary action will be taken. This includes informing relevant authorities, including law enforcement, where appropriate. Our people are expected to look out for and report any concerns about our work or behaviour of our people and/or partners.
- 7.9. Our people who see or experience any abusive or harmful behaviour that does not meet our high standards must report this so that we can act. Breaches of the Code may be subject to disciplinary measures in accordance with our policies and procedures.

8. Accountability

- 8.1. This policy sets out a framework which enables and supports effective safeguarding of the people who encounter us. Every member of the Wren Project is accountable for upholding the safeguarding policy and standards.
- 8.2. The Board of Trustees are deeply committed to providing a safe and secure environment for our people and everyone who engages with us and are responsible for ensuring that the organisation has appropriate policies and arrangements in place.
- 8.3. The Director of Operations is the Designated Safeguarding Officer (DSO) and as such, responsible for implementing and supporting strong safeguarding practice at the Wren Project. This involves:
 - Being the first point of contact for reports of concerns
 - Ensuring that all employees and volunteers in regulated roles are subject to DBS checks where applicable.

- Providing advice and support to employees reporting disclosures or concerns.

8.4. The Wren Project has a hierarchy of responsibility. The flow chart outlines the overarching responsibilities of everyone in the Wren Project:



8.5. The Service Quality and Assurance Committee (SQAC) oversee and scrutinise UK safeguarding activities. The Health, Safety and Security Committee (HSSC) oversee and scrutinise international safeguarding activities.

9. Confidentiality

9.1. Everything shared and discussed in the Wren Project is completely confidential. This message is communicated to Wrens on referral calls, and reiterated in the Information Sheet which is sent to Wrens before they begin sessions. Maintaining confidentiality is a key part of our model and helps encourage Wrens to openly discuss, examine and reflect on their situation.

9.2. Nothing is confidential between a volunteer and the Wren Project. This is explained in the Information Sheet that is sent to Wrens when sessions are confirmed and is also re-stated in the initial assessment by the Volunteer Supervisor. During debriefs, volunteers summarise their conversation with their Wren to the Volunteer

Supervisor. No secrets are kept, and the volunteer cannot promise to hold any details from the Volunteer Supervisor. All Volunteer Supervisors are also bound by the same rules regarding confidentiality within the Wren Project.

- 9.3. We keep notes on each session stored on a secure database (Wren CRM). We keep notes for a period of 6 years, as per our Record Keeping and Data Protection Agreement (2021). Wrens are aware that we keep notes. We comply with GDPR regulation and cyber security compliance which is audited annually by an external expert (Paula Ridge) and the Board of Trustees.
 - 9.4. All Wrens agree to a GDPR request on referring to the Wren Project, outlining our policies. This is then verbally communicated on their referral call.
 - 9.5. All volunteers sign a GDPR request when applying to volunteer at the Wren Project, outlining our policies. All volunteers sign a Volunteer Agreement Form prior to volunteering and access to the database. This Agreement Form stipulates the GDPR and Confidentiality Policy of the Wren Project.
 - 9.6. We will only share information outside the Wren Project with the Wren's/ volunteers expressed permission/ upon their request. The exception where confidentiality will be broken regardless of the permission of the Wren is where required by law: as a result of Prevent Concern, in the case of a terror threat or due to lack of mental capacity (as defined by the Mental Capacity Act 2005).
 - 9.7. In circumstances outlined in point 9.6, we will only break confidentiality with the prior approval of the CEO or Safeguarding lead. Full details of the incident and details of the confidentiality breach will be reported to the Trustees.
 - 9.8. This confidentiality policy does not apply in cases related to the safeguarding of minors. Where minors (people aged under 18) are concerned, the Wren Project complies with government regulation outlined in Working Together to Safeguard Children 2018:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf
10. Training and support
 - 10.1. The objective of our training is to provide volunteers and employees with a clear understanding of our safeguarding procedures and the chain of support available to them.

- 10.2. We provide training as a core element of the induction process for all staff and volunteers.
- 10.3. We ensure that all employees and volunteers have read, understood and signed the Safeguarding Procedure Policy Document.
11. In order to safeguard our Wrens we will:
- a) Within the limits of the law, always take steps to preserve each Wren's confidentiality, which we see as fundamental to the service we offer.
 - b) Value, respect and listen to them.
 - c) Appoint and train an overall designated safeguarding lead for the Wren Project and a lead board of trustees member responsible for safeguarding.
 - d) Implement safeguarding guidelines through the promotion of clear procedures and a code of behaviour for staff and volunteers.
 - e) Conduct a phone assessment with all potential Wrens to ensure that we can provide the appropriate support for them.
 - f) Only support adults aged 18 or over.
 - g) Only support adults who we assess can take responsibility for their actions. This will not include those potential Wrens unable to make decisions under the Mental Capacity Act 2004.
 - h) Recruit staff and volunteers safely, ensuring that all necessary checks are made in compliance with local laws and good practice.
 - i) Interview all volunteers (who must be age 18+) and ensure they complete a comprehensive, selective training programme and a probationary period.
 - j) Provide adequate training for the safeguarding lead.
 - k) Keep written notes on our Wrens, which we are happy to share with them. No records will be kept for longer than six years after contact has ceased.
 - l) Ensure volunteers include in their notes any disclosure by Wrens of serious risks to children and that the Operations Team flag such disclosure to the designated safeguarding lead, who will decide what action is needed.

- m) Ensure that safeguarding incidents and concerns are consistently reported to the Wren Project safeguarding lead immediately within 24 hours of receipt, with significant concerns escalated to the full board.
- n) Ensure that safeguarding numbers and trends are reported to and reviewed at the board.
- o) Create and maintain an anti-bullying environment and ensure there's a policy and procedure to help deal effectively with bullying.
- p) If a supervising volunteer or member of the Wren Team has significant concerns for the safety of a Wren, it is our policy to consider what additional safeguards can be put in place. We will always do this in consultation with the Wren, who retains control and responsibility – we will only take additional steps with the agreement of the Wren.
- q) Any high-risk concerns are referred to professionals on the Wren Project Board for additional support and input.
- r) High risk Wrens are monitored by the Operations Director.
- s) Continue to collect narrative feedback directly from Wrens to monitor feedback on the support reviewed but also as an additional mechanism where any concerns can be raised independent of the volunteer.
- t) Seek external help if necessary.
- u) Comply with any statutory request for mandatory disclosure under the Care Act 2014 or the Children Act 2004, or under other applicable legislation (including the terrorism legislation) or any court order.
- v) Respond swiftly to any changes in the context in which we operate by reviewing our systems and developing additional guidance, training and resources as and when required.

12. Conducting a safeguarding incident

Responding to a safeguarding incident in an appointment: guidance for listeners

- Listen carefully and take all issues seriously. Remain calm and available to the Wren
- Discuss/ gently review with the Wren the next steps they might take to look after themselves
- If this is not possible, advise the Wren that you would value talking to your Volunteer Supervisor and/ or you would like your Volunteer Supervisor to join the appointment to support the Wren more fully

- Try not to leave the Wren alone in the session, mute yourself and call your Volunteer Supervisor or send your Volunteer Supervisor a message. Explain to the Wren why you are seeking further support
- Your Volunteer Supervisor will support you and the Wren in the direction of safety, preventing or minimising any further harm. This could include encouraging the Wren to take actions to help themselves (such as calling one of the emergency services)
- Write a detailed description of the build up to the situation in your report. Be as specific as you can regarding the Wren's communication (their words or actions) as possible.

Should an individual unknown to the Wren Project contact us in distress, we will:

- Encourage the individual to take action for themselves. Explain clearly that *we are not medical professionals and will not offer any medical advice. All medical emergencies should be dealt with by their own medical team which they are responsible for contacting.*
- Inform the individual that we will not call the services on their behalf and encourage them to take steps to do this themselves.
- Write a report of what has been said, using the person's words and what you have heard using the Safeguarding Incident Report Form.

13. Documenting Incidents

13.1. Following every listening session, every volunteer is required to write a short report outlining the key points discussed in the appointment. The supervising volunteer is required to read this within the 3 hours of the shift and sign off the report.

13.2. All concerns will be written in the report.

13.3. Additional safeguarding concerns will be reported using the Wren Project Safeguarding flow chart (8.4). In addition, all steps will be taken to:

- Prevent or minimise any further harm.
- Report to the police, if it is suspected a crime has been committed and the Wren Project is obliged under law to break our confidentiality policy. This times at which we are obliged are stated under point 9.6 of our Safeguarding Policy.
- Plan what to say to staff, volunteers, members, the public and the media.
- Review what happened and prevent it from happening again - this may include strengthening internal controls and procedures, and/or seeking appropriate help from professional advisers.

- 13.4. If any employee or volunteer is involved in an actual or suspected safeguarding incident, or if a serious safeguarding incident takes place within any of the Wren Project's workplaces or working context, they should complete a Safeguarding Incident Report Form.
- 13.5. All incident reports will be sent to the Designated Safeguarding Officer who will complete the relevant sections, detailing actions, outcomes and follow up.
- 13.6. All Safeguarding Incident Reports will be sent to the Board of Trustees where further action can be taken (if deemed necessary) and corrective actions are decided, and the incident is closed.
- 13.7. All Safeguarding Incidents will be anonymised, summarised and collated in the Safeguarding Incident Book, recorded in the Wren Project Risk Register. This will be available to any volunteers or employees. This will also be used for training purposes.

14. Escalating Safeguarding Incidents to the Board of Trustees

If a safeguarding concern is escalated to the Wren Board of Directors, the Trustee Safeguarding Lead on the Board will assess the situation, normally within 24 hours but no later than 48 hours of the concern being submitted. The Trustee Safeguarding Lead on the Board will:

- 14.1. Assess the situation within 24 hours but no later than 48 hours of the concern being submitted.
- 14.2. Ensure that the actions and resources given to the investigation are in accordance with the Safeguarding Policy and Procedures of the Wren Project.
- 14.3. Every effort will be made by the Wren Board to avoid a conflict of interest regarding the personnel involved in any investigation.
- 14.4. Any internal investigation may involve management, employees, volunteers or the Wren Board members as appropriate.
- 14.5. Any external investigation may involve external agencies, regulators or the police.
- 14.6. If a decision is made not to investigate, the individual raising the concern (assuming they have revealed their identity) will be contacted by a Wren Board member and given the reasons for this decision.
- 14.7. The Trustee Safeguarding Lead will report their findings to the Wren Board and, subject to any legal constraints, may also communicate the findings of the investigation to:
 - the person raising the concern (assuming they have revealed their identity);

- the individual(s) under investigation; and, if appropriate,
 - external agencies, regulators or the police who need to consider whether action should be taken based on the findings.
- 14.8. If a breach of the relevant laws or policies is proven, appropriate action will be taken, and the Wren Board will agree to any communication plan to those involved with the charity and the media as appropriate.
- 14.9. A record of all matters raised through the Safeguarding Policy will be securely retained by the Trustee Safeguarding Lead in accordance with the General Data Protection Regulations 2018.
- 14.10. The Wren Board of Directors will monitor all Safeguarding reports made to the Trustee Safeguarding Lead and will also assess the effectiveness of the Safeguarding Policy including any emerging patterns to understand how to stop incidents from reoccurring.
15. Reporting a serious safeguarding concern to the Charities Commission
- 15.1. In addition to following the protocols set out within this policy, it should also be reported to the Trustees and the Charity Commission. The Trustees are responsible for reporting any 'serious incidents' to the Charity Commission if any safeguarding concerns have resulted or could have resulted in harm.
- 15.2. This includes situations where the Wren Project's own policies or procedures have not been properly followed. If those breaches have put people who encounter the charity through its work at significant risk of harm, the Designated Safeguarding Officer will report them even if no actual harm occurred.
- 15.3. Trustees should report a serious incident to the Charity Commission if:
- Beneficiaries have been, or are alleged to have been, abused or mistreated while under the care of the Wren Project.
 - There has been an incident where someone has been abused or mistreated (alleged or actual) and this relates to the Wren Project's activities.
 - There has been a breach of procedures or policies at the Wren Project which has put beneficiaries at risk.
- 15.4. All suspected or actual safeguarding incidents should be reported to the Charity Commission by email at: RSI@charitycommission.gsi.gov.uk. 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.

16. Further Safeguarding Guidance

16.1. Care and support statutory guidance (Department of Health)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366104/43380_23902777_Care_Act_Book.pdf

16.2. The Care Act 2014: easy read version (Department of Health)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/365345/Making_Sure_the_Care_Act_Works_EASY_READ.pdf

16.3. Adult Support and Protection (Scotland) Act 2007

<http://www.legislation.gov.uk/asp/2007/10/contents>

16.4. Prevent guidance: England & Wales:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

16.5. Gov e-learning training:

<https://www.elearning.prevent.homeoffice.gov.uk/>

17. Procedures supporting implementation

17.1. Safeguarding Vulnerable Groups Act 2006. The Act places a statutory duty on all those working with vulnerable groups to register and undergo an advanced vetting process with criminal sanctions for non-compliance.

17.2. Disclosure & Barring Service 2013.

18. Review and maintenance


18.1. This policy document will be reviewed quarterly by the Designated Safeguarding Officer and annually by the Board of Trustees.

- 18.2. Legislation guidance and changes will be reviewed on a quarterly basis by the Designated Safeguarding Officer and updated as required.
- 18.3. Following any serious Safeguarding incidents, The Board of Trustees will meet to discuss, action and close the case. The Safeguarding Policy Document will be updated as necessary.


Last reviewed: 31st January 2023

Signed (electronically): 

Kate Middleton, CEO, Policy Owner

Signed (electronically): 

Phoebe Welsh, Designated Safeguarding Officer of the Wren Project

Signed (electronically): 

Kerry Ryan, Deputy Chair and Trustee Safeguard Lead of the Wren Project