

Investment20/20 Safeguarding Policy

This policy applies to anyone working on behalf of the Investment Association and Investment20/20. This policy:

- Provides links to relevant sources of information to ensure that all adults who work with Investment20/20 have a good understanding of safeguarding and child protection
- Outlines good practice guidelines
- Ensures the commitment to safe recruitment for the Investment20/20 team
- Ensures that all adults who work with Investment20/20 are aware of the structured response procedure for safeguarding concerns
- Expresses the commitment of Investment20/20 to safeguarding and child protection

Investment20/20 has a responsibility to promote the welfare of all children and young people and keep them safe.

1. About Investment20/20

Investment20/20 helps people find out about careers in investment management. We work with schools, colleges, universities and community groups to enable young people to find out about careers in investment management and to help them navigate their way to entry level roles.

We work with young people in four ways:

- a. Delivery of careers workshops to groups of young people aged from 11 years upwards in schools, colleges, universities, community venues, employer venues, and other spaces.
- b. Through our longer-term programmes where we engage with young people on an ongoing basis, in both individual and group work settings.
- c. Delivery of virtual activities such as online sessions, webinars, and video calls to young people, delivered in partnership with employers and industry volunteers
- d. Through our Investment20/20 Trainee Programme, where young people over the age of 16 are employed by an Investment20/20 employer partner for a one-year contract.

Young people who participate in Investment20/20 activities b, c and d above are aged over 16. We engage with young people under the age of 16 only through activity a, above. Any of the young people with whom we work may be enrolled at a school sixth form, FE College, Sixth Form College or other education provider.

2. Types of abuse

It is important for any adult involved in working with Investment20/20 to have a good understanding of types of abuse. All adults involved in Investment20/20 have a role in identifying signs of abuse. In this policy "child" and "young person" are used interchangeably to mean any person under the age of 18.

The types of child **abuse** that may occur are extensive. It is the responsibility of each Investment20/20 member of staff and volunteer to ensure they have read the briefing on the types of child abuse on the NSPCC website: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>.

In addition to types of abuse, we recognise that mental health is particularly important to the ages of the young people that Investment20/20 work with. More can be found here: <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/mental-health-suicidal-thoughts-children/>.

3. Good practice guidelines

All adults working with Investment20/20, in whatever capacity including volunteers, should demonstrate exemplary behaviour. The following are common sense examples of how to create a positive culture and environment. These examples and guidelines apply to face to face delivery, online, virtual, and video calls.

- Always work in an open environment, avoiding private situations
- Never be on a video call or virtual platform by yourself. Always ensure there is a member of the Investment20/20 team already signed in.
- Treat all young people with respect and dignity
- Always prioritise the welfare of each young person
- Maintain an appropriate emotional and physical distance from the young person
- Ensure the young person is in a space with other people around - never be in a room alone with a young person, and keep doors open and blinds up
- Be an excellent role model e.g. not smoking/drinking in the company of a young person
- Give enthusiastic and constructive feedback rather than negative criticism
- Administer first aid/other medical treatment when necessary, and report in line with the hosting organisation's/venue's policy and procedure, and inform Investment20/20
- Never take a young person in a car or accompany on a journey, e.g., after a careers event
- Do not say or do anything that might be interpreted as aggressive or hostile
- Do not do things of a personal nature for young person at an Investment20/20 event or programme student that they can do for themselves
- Report any incidents (see below)

Under no circumstances should any adult working with Investment20/20 (this applies to face to face, online, virtual or video calls):

- Engage in rough physical or sexually provocative games
- Allow or engage in **any form** of touching (e.g. consoling arm if the student is upset)
- Allow young people on Investment20/20 events/programmes to use inappropriate language unchallenged
- Make sexually suggestive comments to young people on Investment20/20 events/programmes
- Meet with young people on Investment20/20 events/programmes in an inappropriate place, e.g., a nightclub, bar, restaurant
- Allow allegations made by young people on Investment20/20 events/programmes to go unchallenged, unrecorded or not acted upon
- Attempt to engage with a young person personally outside of the Investment20/20 led (face to face, virtual, online or video calls) event
- Fail to report to Investment20/20 anything inappropriate that a young person does or says

4. Incidents that must be reported

If you witness or are a party to any of the following, you should report this immediately to the Investment20/20 Safeguarding Lead and record the incident. You must report any incidents including the below:

- You hurt a young person on Investment20/20 events/programmes, even if unintentionally
- You witness any inappropriate behaviour, whether from another adult or from a young person on Investment20/20 events/programmes

- A young person on Investment20/20 events/programmes
 - seems distressed
 - mentions they are in danger at home or school
 - mentions they want to harm themselves/others
 - appears to be physically attracted to you or to another adult
 - misunderstands or misinterprets something you have done
 - makes suggestive or inappropriate comments, either in person, online or using any other form of communication.

Where a young person is on an Investment20/20 work shadowing or work placement activity, the employer is expected to notify Investment20/20 and the school/college immediately upon becoming aware of any safeguarding/child protection issues.

5. Investment20/20 organised events: Face to face outside of an education or community group setting

Investment20/20 has a duty of care towards young people who are participating in our organised events. This duty of care covers the duration of the event from the designated meeting point at the start time of the event until the time that the event finishes as outlined on event material. Investment20/20 does NOT have a duty of care for young people when they leave the premises of the venue at any point during the event.

Investment20/20 is responsible for obtaining from the venue a risk assessment for the visit.

When a teacher or other school/college/university/community group representative is attending with young people, the young people remain in the duty of care of the school/college/university/ community group. Investment20/20 will provide a risk assessment of the venue but it is expected that the school/college representative takes full responsibility for their students for the entire duration of the visit including obtaining parental consents in line with their own safeguarding policy.

When students attend an event independently of the school/college/university/community group, Investment20/20 expects students to travel to the event by themselves and manage the planning and funding of their journey independently of Investment20/20.

Investment20/20 has NO responsibility for students on the travel to or from the events. When the student is attending independently of their school/college/community group, Investment20/20 will require a completed parental consent form to be submitted.

Investment20/20 will endeavour to gain emergency contact details for each young person that attends an event, and will call a parent/carer should a young person become unwell or if there is a concern regarding their welfare. Investment20/20 accepts no responsibility for personal belongings brought by students to events.

Investment20/20 follows a guideline of one adult for every 30 students when young people are under 18 years old. These adults may include adults from the hosting organisation who support the event.

6. Investment20/20 non organised events: Face to face in an education or community setting

Visits to schools, colleges, universities and community settings are part of the Investment20/20 outreach strategy. These activities take two forms, but not restricted to just these two:

- a. A careers fair/exhibition
This tends to be in large event with many other organisations. Students visit the exhibition stand for information on Investment20/20.
- b. Delivering a workshop
This will be in a classroom style setting. The role of Investment20/20 is to deliver a talk about careers in investment management.

Both these activities are managed and supervised by the hosting organisation. The hosting organisation is responsible for student welfare and safeguarding as the activities take place on their premises, but the Investment20/20 safeguarding best practice still applies to all Investment20/20 staff and volunteer conduct. The hosting organisation must always ensure there is a member of their staff in the room with the Investment20/20 representative (this includes the Investment Ambassador).

7. Investment20/20 events: Virtual, online, video calls

Our online, virtual and video call events are chaired and managed by two members of the Investment20/20 team. Employer supporters that participate never do so without the supervision of Investment20/20. Our online, virtual and video call events are for sixth form and university students only. **All of our video and online sessions are recorded for safeguarding purposes.** They are always group based. The only occasion a student may be on video call by themselves is for an interview for one of the Investment20/20 programmes, but there will also be two Investment20/20 members of staff. Our virtual events are run in two ways:

- a. In a *group session* where all students are *in their classroom* and the teacher is the only person logging into the call. Investment20/20 representatives are projected onto the interactive whiteboard. No student is on webcam unless the teacher has enabled it/allowed it. The teacher is the only one who has the dial in details and is responsible for managing the session, safeguarding and welfare of the students. This is very similar to Investment20/20 visiting an education establishment and being in the classroom: the teacher is responsible for session logistics and student welfare, Investment20/20 and the Investment Ambassadors have a speaking only role, and it is a group one off intervention. These sessions will not be recorded.
- b. In a *group session* where students are joining *independently* of their school/college in a *one-off* intervention
Investment20/20 delivers sessions which individual students are able to join independently. Students will come from a range of schools, colleges and universities. Students will always be in year 12 and above. The virtual programmes operate on a professional video conferencing platform where no details are shared. Students can choose to keep themselves off webcam should they prefer. Students in sixth form need to submit a parental / carer permission form before taking part in any virtual, online or video call activities, which includes reviewing and agreeing to the Safeguarding policy. Investment20/20 always lead these sessions and there is always two members of staff present at one time, or more than that should students be under 18 as per our staff/student allocation covered in point 5. Investment20/20 led virtual event/sessions will always be recorded for safeguarding purposes, and not for re-distribution reasons, and students will be asked to agree to this as part of the registration process for the event/session.

8. Communication

Any adult representing Investment20/20 must ensure that all communication is transparent and open to scrutiny.

Investment20/20 staff must use their Investment20/20 mobile or office phone to contact young people, and **NOT** their personal phone number. If their Investment20/20 phone is damaged, not working or lost, and staff must call a young person, then they may use their personal phone but ensure their number is **blocked** and do not share their personal number with the young person. Staff may only communicate with young people on social media via the official Investment20/20 social media outlets or their own LinkedIn account (no other social media platforms) but their **contact details on LinkedIn must be hidden**. Any email communication must take place on the Investment20/20 email account and **NOT** personal email accounts.

9. Investment Ambassadors and other volunteers that support Investment20/20 activities

Investment Ambassadors and volunteers who support the delivery of Investment20/20 careers sessions (face to face, virtually, online or video calls). Investment Ambassadors and volunteers must not actively seek contact with young people after their session. Investment Ambassadors must follow all the guidelines in this document including communication guidance on using LinkedIn (see point 8).

An Investment Ambassador will **NOT** take part in a virtual session (see point 7) without the supervision of an Investment20/20 member of staff.

An Investment Ambassador may take part in a face to face session without the supervision of Investment20/20 in an education or community-based workshop. In this situation, the teacher/educator/key contact of the education/community organisation is responsible for managing the session as outlined in point 6.

10. Photography and film

Investment20/20 will take photos and films at our events, which could be either Investment20/20 organised events or a partner organisation event. Young people will be asked to agree to their image/footage being used as part of the registration process for the event where it is Investment20/20 organised – this includes our face to face, and online, virtual and video call events and programmes. Where it is a partner organised event, it is the partner organisations responsibility to obtain consent for photography and film.

11. Investment20/20 Recruitment

All Investment20/20 paid staff are to:

- Have a Disclosure and Barring Service (DBS) check to Enhanced level (Guard List checked) in England where they have a frequent advice role with young people, and Enhanced level (not Guard List checked) for infrequent advice roles.
- Have a Basic Disclosure check in England where the role does not include infrequent advice to young people.
- Have a Basic Disclosure Scotland check in Scotland
- Register with the DBS Update Service in England, **or** undergo a new DBS Enhanced check every 3 years in England
- Undergo a new Basic DBS Check every 3 years in Scotland

All members of Investment20/20 staff will be informed about the Safeguarding Policy and the procedures that are to be followed should any issues arise. They are required to confirm that they have read the Safeguarding Policy, and that they confirm that they will ensure

compliance. All adults working with Investment20/20 are expected to follow the good practice guidelines as set out in this policy. In addition, all Investment20/20 staff must complete the NSPCC Introduction to Safeguarding online course. This training must be refreshed every three years.

When a new member of Investment20/20 joins, they are required to complete relevant DBS checks as part of the recruitment process, read and confirm they will ensure compliance with the Safeguarding Policy, and complete the NSPCC Introduction to Safeguarding online course.

12. Reporting a concern or allegation

When concerns are reported, all adults working with Investment20/20 should follow the response guidelines set out below.

When a complaint is made about an individual involved in a young person's work shadowing/ work experience placement, Investment20/20 staff will speak with their key contact from the individual's organisation to review the evidence. The shadowing/ placement must stop until the outcome is determined.

a. What to do if you are informed about a concern

- Listen carefully
- Do not ask leading questions
- Record the concern in writing, using the exact words the subject has used
- Record details such as names, dates, times, and location
- Be clear to the young person that you cannot guarantee confidentiality
- Explain that information will only be shared with people that will help to ensure the young person's safety and well-being
- Inform the Investment20/20 Safeguarding Lead immediately
- The Safeguarding Lead should review the information and ALWAYS pass to the school/college/university/community group Safeguarding Officer. It is the responsibility of the school/college/university/community group Safeguarding Officer to take the necessary action to ensure the situation is addressed appropriately
- If the young person is not part of a school/college/university/community group, the Local Authority Safeguarding Officer must be notified
- Investment20/20's responsibility is to follow through on actions allocated. Assistance will be provided to external investigators.

b. Process for reporting

It is the responsibility of the school/college/university/community group/Local Authority Safeguarding Office to liaise with the parents/carers of the young person involved, should it be appropriate. If there has been any physical injury to the young person during an event/shadowing day/work placement the parents/carers should be informed immediately.

- i. Report disclosure to the Investment20/20 Safeguarding Lead via phone and email: safeguarding@investment2020.org.uk / 07851 950207
- ii. The Investment20/20 Safeguarding Lead records the disclosure on the Safeguarding Spreadsheet. All correspondence, including notes from phone calls and conversations, are saved in the secure Safeguarding folder on the Investment20/20 shared drive.
- iii. The Investment20/20 Safeguarding Lead reports the disclosure to:

- a. The young person's school, college, university or community group and if necessary, the Safeguarding Lead at the Local Authority in which the young person attends school/college/university/community group
- b. Depending upon the person making the disclosure, it may be necessary to inform one or more of the following people
 - i. School or college Safeguarding Officer
 - ii. Employee's manager or HR manager
 - iii. Volunteer's manager or HR manager
- iv. The Safeguarding Lead notes last key action point taken and who is responsible for continuing investigation.

Investment20/20 will keep a clear and comprehensive summary of any allegations made, details of how it was followed up, and details of any action taken and decisions reached. This will be recorded on the Safeguarding spreadsheet, and all correspondence saved in the secured Safeguarding folder on the Investment20/20 shared drive.

c. Outcome of investigation

If the allegation is substantiated their participation in Investment20/20 programme activities may be terminated. Further action may be pursued by the relevant authorities. The Investment Association will make any notifications that are required by law. If a criminal offence has been committed the police (and any other relevant body) will be contacted to take the matter further.

If an allegation is determined to be unfounded or malicious, The Investment Association will alert the relevant people or external bodies. In the rare event that an allegation is shown to have been deliberately invented or malicious, the Investment Association will ask the police to consider whether any action might be appropriate against the person responsible.

13. Disciplinary procedures: Investment20/20 staff

Where a disciplinary action is taken against Investment20/20 staff, it should be done so in accordance with the Investment Association's disciplinary policy.

14. Investment20/20 volunteers

Where it is an individual who is not an Investment20/20 employee, i.e., a volunteer, it is their employer who will be responsible for taking disciplinary action based upon their own processes and policy.

Contacts

Initial queries should be directed to Jenny Barber, Safeguarding Lead, on 07851 950207 or jenny.barber@investment2020.org.uk. Further information can be gained from the NSPCC Helpline: 0808 800 5000