



ENGLISH HERITAGE

Safeguarding Policy

1. Purpose

- 1.1. The public expects all charities to be safe and trusted places for their customers and beneficiaries as well as for their own people.
- 1.2. At English Heritage (EH) we view the safeguarding of everyone who comes into contact with us as a key organisational priority.
- 1.3. We want EH properties, events, stores, e-sites and offices to be accessible, enjoyable and safe places, so we take extremely seriously our responsibility to safeguard all people within our stakeholder community including members, visitors, employees, volunteers and contractors.
- 1.4. At EH we bring history to life for millions of people each year including individuals who may be considered to be vulnerable, as follows:
- 1.5. **Adult at Risk:** this is a person who is 18 years of age or over, and who:
 - Has care and support needs (whether or not those needs are being met by the Local Authority or others)
 - Is experiencing or at risk of abuse or neglect
 - Is unable to protect themselves from experience or risk of abuse or neglect because of those support needs.
- 1.6. **Child:** A child is someone who has not yet reached their 18th birthday. This includes children aged 16 and 17 who may be living independently, but should be afforded the same protection and entitlement as any other child.
- 1.7. Safeguarding adults at risk means protecting their right to live in safety free from abuse and neglect.
- 1.8. Safeguarding children means to:
 - Protect children from abuse and maltreatment
 - Prevent harm to children's health and development
 - Ensure children grow up with the provision of safe and effective care
 - Take action to enable all children and young people to have the best outcomes.

2. Scope

- 2.1. This policy is to be followed by all employees, volunteers and contractors in EH at all times. They will take all reasonable steps to ensure the safeguarding of all those that come into contact with EH and will follow our reporting process (See **Section 4.2.1**) when they suspect or are aware of a potential safeguarding incident or concern.
- 2.2. Overall responsibility for ensuring that EH has safeguarding policies and procedures, principles and practice in place rests with the Board of Trustees, with operational compliance delegated to the Chief Financial Officer. This policy is managed by the Head of HR and Volunteering, who is also the Designated Safeguarding Officer for EH.
- 2.3. The Designated Safeguarding Officer has the responsibility for:
 - Developing and creating accessible and visible safeguarding policies and procedures, principles and practice ensuring that they keep up to date with legislation and best practice reviewing them regularly alongside other allied policies
 - Ensuring that all employees and volunteers receive safeguarding training and development appropriate to their role; and that they comply with the charity's policies and procedures
 - Receiving concerns and referring them to the appropriate statutory bodies, when required and in a timely manner
 - Ensuring that the charity follows all mandated safeguarding reporting procedures and that the processing of all correspondence and records related to safeguarding incidents complies with the relevant data protection legislation.
 - Embedding and maintaining a culture of safeguarding at EH.
- 2.4. This policy complies with the following legislation and guidance:
 - Safeguarding Vulnerable Groups Act 2006
 - Health and Safety at Work Act 1974
 - Management of Health and Safety at Work Regulations (1999)
 - General Data Protection Regulations (2018)
 - The Children Act 1989 and The Children Act 2004
 - The Children and Social Work Act 2017
 - Working Together to Safeguard Children (Department for Education, 2018)
 - The Fundraising Regulator's Code of Fundraising Practice
 - The Charity Commission: Safeguarding Guidance for Charities.
 - Keeping Children Safe in Education guidance 2022
- 2.5. The following internal policies / guides also underpin this policy:
 - [Recruitment Checks Guidance](#)
 - [Safety & Risk Management Standard for Young Persons](#)
 - [Bullying and Harassment Policy](#)
 - [Whistleblowing Policy](#)
 - [Code of Conduct](#)
 - [Social Media Policy](#)
 - [Modern Slavery Transparency](#)

3. The Policy

- 3.1. The Charity Commission requires all charities to have policies in place which make it clear to trustees, employees, volunteers, contractors, partners and beneficiaries how they will:
- Protect people from harm (see Section 4.1, below)
 - Make sure people can raise safeguarding concerns (see Section 4.2, below)
 - Handle safeguarding allegations or incidents (see Section 4.3, below)
 - Report safeguarding allegations or incidents to the relevant authorities (including internally at EH to the Audit and Risk Committee) (see Section 4.4, below).

4. Processes to be followed

- 4.1. **Protect people from harm:** The most sustainable way that we can keep EH as a safe and trusted place, for all our stakeholders, is to ensure that we maintain a culture where we all work together to maintain an environment that is safe, healthy and free from harassment or abuse of any sort and where everyone feels able to report concerns, confident they will be heard and responded to. We do this through:
- 4.1.1. **Identifying types & indicators of abuse:** In order to protect people against harm effectively, all colleagues should be familiar with the various types and key signs of abuse. Abuse can appear in many forms, for example: physical, sexual, emotional, digital, neglect, domestic, financial and institutional. Radicalisation is also a form of abuse. **Appendix I** contains links to additional sources of information on identifying types and indicators of abuse.
- 4.1.2. **Safer recruitment:** All EH employees and volunteers (including Trustees) are safely recruited using a robust selection process and background checks relevant to their role, including Disclosure and Barring Service (DBS) checks for certain roles. DBS checks are always used in the recruitment of posts where there is the opportunity for employees or volunteers to be working unsupervised with children or adults at risk, for example employees and volunteers at smaller “singleton” sites and those in youth participation roles. More information regarding what level of check is required for each EH role is contained in the Recruitment Checks Guidance which can be accessed [here](#). All employees, volunteers and contractors will receive a copy of this Policy at their induction and be responsible for adhering to it at all times.
- 4.1.3. **Safeguarding training for colleagues in site-based customer-facing roles:** All site-based employees and volunteers receive a thorough induction and annual refresher training appropriate to their role. This training covers the accessibility and support needs that visitors may have, how these needs differ, and how we will safeguard and support all customers, including children and adults at risk, to get the most from their visitor experience. Site-based colleagues are also trained on dealing with other, more serious, incidents of a potential safeguarding nature such as lost children on site, concerns regarding the behaviour of parents or guardians towards children in their care, and people found rough sleeping in EH grounds, gardens or landscapes. See Section 4.1.5 re additional training for employees and volunteers working directly with children.

4.1.4. **Safeguarding support for managers:** The HR and Volunteering team will ensure that managers of any employees and volunteers with support needs, or who are children or adults at risk, are fully briefed on how to manage any necessary adjustments required. This might mean, for example, ensuring that a manager of an employee or volunteer, under the age of 18, is aware that this colleague must have an enhanced number of statutory breaks during the working day because of their age. There is also a Safety & Risk Management Standard for Young Persons [here](#) that all managers of children must refer to. This includes suggestions on adjustments that may need to be made to a colleague's work pattern or working environment because of their age, for example: inexperience and lack of perception of danger, physical immaturity (risk of musculoskeletal damage) and psychological immaturity. Managers are required to complete a risk assessment template which asks them to consider whether the child or adult at risk will be affected by the activity or hazard.

4.1.5. **Welfare of Children:** our site operating practices mandate that, in most circumstances, only children above the age of 16 should be allowed on our sites unsupervised. When schools or other young people's groups visit EH sites, for example (including for education visits, with over 300,000 children visiting per annum), it is a requirement that they must have adequate adult/child supervisions ratios in place upon entry and that EH people on site

, have no supervisory role to play. In some circumstances however, particularly with youth participation projects via Shout Out Loud, EH will operate "in loco parentis" with groups of young people where the children may be as young as 11. Our youth participation teams are required regularly to undertake enhanced safeguarding training so that they are fully conversant with what they should do in responding to concerns about the welfare of anyone under their supervision. Please see **Appendix 2** for additional information for employees and volunteers regarding how best to communicate with children, and **Appendix 3** for the required supervision ratios. **Appendix 4** illustrates the more enhanced training that employees and volunteers, working with children in this capacity, undertake.

4.1.6. **A dignified workplace for all:** We want all EH properties, events, stores and offices to be free from any sort of behaviour or culture that is undignified or makes people feel uncomfortable or violated. We therefore have a Bullying and Harassment Policy [here](#) that reinforces EH's stance that this behaviour is unacceptable and gives information on how bullying and harassment can be recognised, and how to seek help, both formally and informally.

4.1.7. **Monitoring the use of the formal EH social media channels:** Social media is a powerful communications and marketing tool for EH and, as such, there is a small team of people who, as part of their role, have systems privileges that enable them to be the "voice of EH" on social media channels. Whilst social media is a positive asset, it can also be a vehicle for grooming or inappropriate contact with children or adults at risk. As such, EH undertakes to habitually check the social media footprint of these colleagues' work to safeguard against inappropriate use of these channels is being made. These checks are recorded.

4.1.8. **Safe and responsible fundraising:** As a charity, EH engages with potential donors who may be adults at risk. We take great care to ensure that our fundraising is safe and responsible and in line with best practice as outlined by the Fundraising Regulator in its Code of Fundraising Practice, accessible [here](#).

- 4.2. **Make sure people can raise safeguarding concerns:** It is not the responsibility of anyone working at EH to decide whether or not a person is or might be being abused. However, there is a responsibility to act on suspicions or concerns to protect people in order that appropriate agencies can then make enquiries and take any necessary action to protect the person.
- 4.2.1. **Who to contact:** If any EH person suspects or is aware of any concern relating to the welfare, wellbeing or safeguarding of an employee, volunteer, contractor, customer or any other stakeholder, or if they witness something that causes them concern, then they are obliged to raise these suspicions or concerns immediately with their line manager or the Human Resources and Volunteering team [here](#). The Head of Human Resources and Volunteering (as the charity's Designated Safeguarding Officer) will be informed immediately.
- 4.2.2. **In an emergency:** N.B. In the event that it is felt there may be an immediate and significant risk to the safety of an individual, and it is impractical for that EH colleague to contact their line manager or the HR and Volunteering team in the first instance, then they must report the matter to the police via 111 or 999 and then let their line manager / the HR and Volunteering team know retrospectively.
- 4.3. **Handle safeguarding allegations or incidents:** At times, EH employees and volunteers may have to respond to concerns about the welfare of a person under their supervision. This could relate to actual or alleged harm. Alternatively, a person we are working with may disclose abuse directly to us. This section provides information and guidelines on our procedures in these situations.
- 4.3.1. **Responding to concerns:** Please follow the steps outlined in Section 4.2. above.
- 4.3.2. **Hearing a disclosure: What a EH colleague should do if an individual comes to them and tells them that they are being abused:** It is normal for both parties to potentially feel overwhelmed and confused in this situation. Abuse is a difficult subject that can be hard to accept and even harder to talk about. Individuals who are abused are often threatened by the perpetrators to keep the abuse a secret. Thus, telling someone about it takes a great amount of courage. So, care must be taken to remain calm and to show support to the individual throughout the disclosure phase. **Appendix 5** provides guidelines on how EH people should respond to a disclosure of abuse, including that it cannot remain confidential to them and must be reported internally (see **Section 4.2.1**).
- 4.3.3. Please note that an individual may make a disclosure about another individual within their social / family network. This also needs to be taken forward as a safeguarding matter. Please follow the steps in this section (**Section 4.3**) and then refer the matter by following the steps in **Section 4.2**, above.
- 4.3.4. Employees and Volunteers affected by a disclosure can seek advice from HR and Volunteering and use [Care First](#), the EH Assistance Programme for our people.
- 4.4. **Report safeguarding allegations or incidents to the relevant authorities and internally to the Audit and Risk Committee (ARC):** When a case of actual harm, alleged harm or risk of harm to one of EH's stakeholders is referred, the Head of HR and Volunteering will contact the relevant local authority's Multi-Agency Safeguarding Board for

advice on where the case should be referred to (for example the police or social services). At this stage the Chief Executive will be informed as a matter of course. The Charity Commission must also be notified of serious safeguarding incidents and the Head of HR and Volunteering will work with the Head of Governance and the Chief Financial Officer to file a Serious Incident Report to the Charity Commission, if required. The ARC is notified of all serious safeguarding incidents, and associated learnings, as part of the whistleblowing and fraud annual update.

5. Appendices

5.1. Appendix 1: Additional information on identifying types & indicators of abuse.

The following external links might be helpful:

www.citizensadvice.org.uk/family

www.nhs.uk/conditions/social-care-and-support-guide/help-from-social-services-and-charities/abuse-and-neglect-vulnerable-adults/

www.nspcc.org.uk

5.2. Appendix 2: Communication with children

- 5.2.1. Individuals who do not have a remit to work directly with children through EH projects should not make any further contact with any child they come into contact with in their role. Those who work with EH youth projects should only make contact with children as defined by their role and / or their manager's instruction.
- 5.2.2. Employees and Volunteers should in no circumstances carry out any communication with a child via telephone, email or social media via their personal accounts and devices. All communication needs to be via approved EH accounts and devices and should be directly related to the individual's role at EH.
- 5.2.3. No employee or volunteer should ask / coerce a child to make contact with them via their personal accounts / devices.
- 5.2.4. No photographs / video should be taken / shared by employees or volunteers on their personal devices. Photographs / video should only be taken with all suitable permissions being in place and should be directly related to EH operations / delivery. Please see separate policies on relation to photographic consent and storage available on the EH intranet.

5.3. Appendix 3: Adult to children supervision ratios

- 5.3.1. It is mandated that two DBS-checked adults, as a minimum, must be present when working with or supervising children and young people. And the following minimum ratios are required to keep children and young people safe:
 - 0 - 2 years: one adult to three children
 - 2 - 3 years: one adult to four children
 - 4 - 8 years: one adult to six children
 - 9 - 12 years: one adult to eight children
 - 13 - 18 years: one adult to ten children

Appendix 4: Enhanced EH safeguarding training suite for those working more closely with children.

Learning plans

NSPCC

LEARNING PLAN
NSPCC Safeguarding Training

Completion of this training is mandatory for all colleagues working with young people or vulnerable adults. It provides our policy on safeguarding, explains how to spot signs of abuse and what steps to follow should you encounter a safeguarding issue. PLEASE NOTE: Access is by desktop computer only.

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Modules

	<p>TOPIC</p> <p>Introducing your to our Safeguarding Learning Programme</p> <p>This topic provides you with an overview of the learning plan, a few points to note and a copy of the safeguarding policy</p>	3 / 3
	<p>CONTENT</p> <p>NSPCC Safeguarding - Introduction to the course</p> <p>Please start here to access the NSPCC Safeguarding training course</p>	Complete
	<p>CONTENT</p> <p>NSPCC Safeguarding Module 1 Recognising Possible Abuse</p> <p>This is module 1 of the NSPCC Safeguarding Programme. In this module you will learn about how to recognise signs of possible abuse.</p>	Complete
	<p>CONTENT</p> <p>NSPCC Safeguarding Module 2 - Respond Appropriately</p> <p>In module 2 of the NSPCC Safeguarding course you will learn about how to respond appropriately to situations.</p>	Incomplete
	<p>CONTENT</p> <p>NSPCC Safeguarding Module 3 - Report your concerns</p> <p>In this module you will learn all about how to report any concerns which you have around safeguarding.</p>	Incomplete
	<p>CONTENT</p> <p>NSPCC Safeguarding Module 4 - Record your observations</p> <p>In Module 4 - you will learn how to record any observations in relation to Safeguarding of young people and vulnerable adults.</p>	Incomplete
	<p>CONTENT</p> <p>NSPCC Safeguarding Module 5 - Personal and Organisational Responsibility</p> <p>Module 5 takes you through how to take personal responsibility for safeguarding and the role of our organisation. Remember when you have completed this learning to read through the English Heritage Safeguarding policy, also in this</p>	Incomplete
	<p>CONTENT</p> <p>NSPCC Safeguarding Module Summary</p> <p>This module is a summary of the NSPCC Safeguarding programme</p>	Incomplete

Appendix 5: Best practice guidelines on hearing a disclosure of abuse.

1. Listen carefully to what the person is saying:

Be patient and focus on what you're being told. Try not to express your own views and feelings. If you appear shocked or as if you don't believe them it could make them stop talking and take back what they've said.

2. Let them know they've done the right thing by telling you:

Reassurance can make a big impact. If they've kept the abuse a secret it can have a big impact knowing they've shared what's happened.

3. Say you'll take them seriously:

They may have kept the abuse secret because they were scared they wouldn't be believed. Make sure they know they can trust you and you'll listen and support them.

4. Explain what you'll do next:

Explain you're obliged to report this matter to a safeguarding-trained colleague who will offer advice on how help can be obtained.

5. Report what the person has told you as soon as possible:

Report this matter to the HR and Volunteering team as soon as you are able. (See **Section 4.2.1**) And, remember, if you feel that the person is in immediate danger and it is impractical for you to contact your or the HR and Volunteering team in the first instance, then you should contact the police (see **Section 4.2.2**) and report the matter internally, retrospectively, the next business day. N.B. It can be helpful to make notes as soon as possible after you've spoken with the person concerned and to sign the notes and mark on them the date and time on which you wrote them.

Policy Owner	Chief Financial Officer
Author	Head of HR and Volunteering
Consultees	N/A
Approval level	Board of Trustees
Date approved	15 March 2023
Outline comms plan	All adult employees, volunteers and contractors will be informed of this Policy (and either provided with a copy or signposted to how to access it) and informed of their responsibility to comply with it, with induction and refresher training appropriate to their role. This Policy will be available publicly on the EH website.
Review frequency	Formal review every 3 years (or earlier if circumstances require, e.g. after a relevant event or change in legislation), with interim review at least every year by SMT Owner
Date of last review	n/a
Next review due	March 2024