



**FIGHTING  
WORDS NI**

The write to right.

# Safeguarding Policy and Procedures April 2021

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## Safeguarding Statement

Fighting Words Northern Ireland (FWNI) believes that all children's lives are enriched by the arts, and is committed to practice that protects children, young people and adults at risk from harm, creating safe and stimulating environments for their creative expression and development.



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This policy has been approved and endorsed by senior management and the FWNI Board of Directors.

In all of our work, the welfare of the child and young people is paramount, with children and young people being treated equally and in a manner that is respectful of their religious, racial, cultural and linguistic, social, gender, and sexual identities. Staff and volunteers are provided with relevant training to uphold this policy and procedures.

## We recognise that:

1. The welfare of the child is paramount, as enshrined in the Children Order (NI) 1995
2. All children – regardless of age, disability, gender, racial heritage, religious belief or sexual orientation/identity – have a right to equal protection from all types of harm or abuse
3. Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
4. Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare

## Principle of Good Practice

FWNI will always:

1. Place children at the heart of our work, recognising their rights as individuals, and listening to, acknowledging and valuing their opinions and needs
2. Treat children and young people with care, respect and dignity
3. Assess the risk to children and young people in all activities
4. Provide staff and volunteers with training on safeguarding best practice and procedures
5. Review policies and procedures regularly (at least every two years)

## Code of Conduct

All staff and volunteers must abide by this Code of Conduct, and induction of staff and volunteers will fully cover the requirements of this code. Any breach of this code of conduct may result in disciplinary action, including removal from FWNI employment or activities.

## Children & young people

We will seek to keep children and young people safe by:

- Valuing them, listening to and respecting them as individuals



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- Setting a good example by using appropriate language, attitude and demeanour at all times
- Wearing FWNI-branded clothing or nametags when provided/relevant
- Avoiding physical contact with children and young people (unless in an emergency or to mitigate harm) and refraining from activity such as tickling/wrestling
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Providing all staff and volunteers with training, support and appropriate supervision in safeguarding issues
- Ensuring at least two adult mentors are present in every workshop or FWNI-run activity (whether in person or online)
- Sharing information about child protection and good practice with children, parents, staff and volunteers, ensuring communication is open and clear
- Sharing concerns with agencies who need to know, and involving parents and children appropriately

In their work with children and young people, FWNI staff and volunteers will never:

- Work or perform without supervisory staff/volunteers present
- Give personal details to children or young people
- Invite/accept invitations to connect with young people via personal social networking sites
- Promise to keep secrets
- Offer/accept lifts, or travel with young people (unless as part of activity and properly supervised or in an emergency)
- Arrange meetings with children or young people outside organised activities
- Bring alcohol to premises of activity, or smoke in presence of children/young people

### Adults at risk

In any FWNI work involving adults at risk (whether as participants, colleagues or members of the public), staff and volunteers SHOULD:

- Promote and protect the human rights of all adults in every aspect of their work
- Treat all adults with dignity and respect
- Be patient and listen to them; communicate clearly, in whichever way best suits the individual and check their understanding
- Treat all adults fairly and equally
- Adopt a person-centred approach
- Promote independence and choice and encourage their participation
- Help all adults to fulfil their ability and potential
- Involve all adults in decision-making to the fullest extent appropriate.

Staff and volunteers SHOULD NEVER engage in any of the following behaviours with adults at risk:

- Abuse, neglect or harm an adult, or place them at risk of harm, whether by omission or commission
- Engage in rough physical games, including horseplay, or in any sexually provocative activity



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- Make sexually suggestive comments
- Form inappropriate relationships
- Gossip about personal and sensitive information
- Make/accept loans or gifts of money

Although our work is typically with young people 18 and under, every guideline in FWNI's Safeguarding Policy also applies to any participants or colleagues who are adults at risk – including recognising and reporting Safeguarding Concerns (p.9 onward).

## Diversity & cultural awareness

FWNI is a definitively anti-discriminatory organisation. Everyone within our organisation will consider the diversity in the needs and practices of all the people with whom we work. We will not discriminate against children/young people or any others who have different cultural backgrounds and beliefs to our own. Staff and volunteers will be open to and aware of the full diversity of identities, beliefs and practices of children/young people and their families. They will ascertain any specific cultural needs and be aware of the difficulties posed by any language barriers or other communication difficulties. Any child or young person with additional practical or cultural needs will be treated with equity and empowered to access and participate in our activities, and enjoy equal protection under this Safeguarding Policy. (Please see our Equal Opportunities Policy for additional information.)

## Physical contact

Any physical contact between FWNI staff and volunteers and children, young people or adults at risk must be governed by these guidelines. Physical touch should only ever be person-centred and appropriate to the situation. It should be appropriate to the age/development of the child or young person, and in response to their particular needs.

There will be instances when physical contact is unavoidable, and in fact necessary; however all such contact should remain within the bounds of this Code of Conduct.

### Appropriate:

- Context-dependent touch within a controlled and supervised environment (e.g. demonstration of dance, positioning, supporting a lift, demonstrating a breathing technique)
- Preventing injury (e.g. catching a falling child, appropriate restraint)
- Handshake and 'high fives'
- Fitting safety equipment (e.g. harness, safety restraint)

### Inappropriate:

- Touch which is unnecessary, unexplained, out of context, or without consent
- Any touch to breast, groin or buttocks areas
- Kissing or hugging (when initiated by the adult)
- Slapping/hitting (even in jest)



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- Holding hands

Young children particularly will often demonstrate affection. Staff and volunteer training and induction will include best practices and methods of how to best respond when a child tries to hug, wants to hold hands, etc.

## Bullying

Through our supportive, transformative creative writing activities, FWNI is committed to providing a caring, friendly and safe environment for all participants. This is especially crucial in our long-term support activities, such as Write Clubs and special projects.

Bullying of any kind is unacceptable in our activities, wherever they take place. If bullying does occur, all children and young people should feel empowered to alert their group leaders and know that incidents will be dealt with promptly and effectively.

### What is Bullying?

Bullying is the use of aggression with the intention of hurting or controlling another person. It comes in many forms:

- Emotional – being unfriendly, excluding, tormenting (e.g. hiding possessions, making threatening gestures)
- Physical – pushing, kicking, hitting, punching or any use of violence
- Racial – taunts, graffiti or gestures related to another's race or ethnicity
- Sexual – unwanted physical contact or sexually abusive comments
- Homophobic – focusing on a person's sexuality
- Verbal/written – name-calling, sarcasm, spreading rumours, teasing
- Cyber/online – interactions on the internet (e.g. email and social media misuse) and mobile phones (including via text messaging and calls, or misuse of associated technology, i.e. camera, video or audio recording facilities)

### Signs and symptoms

A child or young person may indicate by various signals or behaviours that they are being bullied. Adults should be aware of these possible signs and should investigate if a child, for example:

- is frightened of attending the group
- becomes withdrawn, anxious, or lacking in confidence
- attempts or threatens suicide or runs away
- cries themselves to sleep at night or has nightmares
- has possessions which are damaged or "go missing"
- writes about any of the above

### Support & prevention

All FWNI staff and volunteers have a responsibility to understand what bullying is, learn how to recognize the signs of it, and respond promptly and effectively to any issues of bullying. Bullying will not be tolerated.

Methods for helping children to prevent bullying within ongoing FWNI activities may include:

- co-writing and signing a group code of behaviour



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- making up role-plays
- personal writing about their experiences
- having discussions about bullying and why protecting each other matters
- reporting any concerning behaviour or disclosures as appropriate (see procedures on p.13 of this policy)

## Digital Activities

Increasingly, FWNI's writing activities have involved using digital platforms, ranging from writing-sharing portals on our own website to communication tools like Zoom. Especially for Write Club and other special projects involving sustained support for young writers' independent projects, the use of online tools and direct communication with writers is more likely. We will support staff and volunteers to recognise online safety risks for all internet users, and the need for them to protect their own privacy.

### Mobile phones, e-mail & social media

1. Anything which compromises the ability of staff and volunteers to maintain a safe environment and give their full attention to the supervision of children and young people, such as using a mobile phone, should be avoided; a blanket ban is not necessary as mobiles may obviously be useful in emergency situations and are often writing tools for young people.
2. Staff and volunteers should never give their mobile number to children and young people, befriend them on social networking websites or contact them directly through email (without copying in a parent or guardian)
3. In cases where FWNI representative needs to communicate directly with anyone under the age of 18 (or age 18 and still in post-primary education), this will only be done with the full awareness of the young person's primary carer(s):
  - Emails will be copied to their parents or guardians
  - Letters will be addressed c/o parents or guardians
  - Phone calls will only be made directly to parents or guardians

### Digital sharing platforms

In order to develop their independent writing, or to take part in certain special projects, young writers may access a digital sharing platform located on the FWNI website. The guidelines for the use of this platform are shared with parents/guardians and teachers, as they may administer the use of the platform for the writers.

- Digital Write Club content is only visible to fellow members and FWNI staff/mentors.
- Writer accounts on FWNI digital sharing platforms must be requested by a parent or guardian (using their personal e-mail) and can then be changed to the young writer's own e-mail account.
- FWNI staff and volunteers will do all within their control to ensure the privacy and safety of the users of these platforms.
- Feedback is visible only to the writers themselves, and will be monitored by FWNI staff.



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## Online workshops

When working in digital environments with young people, the same rules apply as for in-person events: At least two FWNI representatives (staff or volunteers) with the relevant Access NI checks must be present at all times in a digital workshop. Safety protocols will be shared with the staff and volunteers and participants before and at the start of each session.

For FWNI Zoom meetings, we follow these guidelines:

- Invitations to Zoom meetings are sent (or copied) to parent/guardian e-mails, particularly in the case of participants under 18
- A designated workshop leader will act as host for the session, ending it in the case of inappropriate behaviour by anyone present.
- Waiting rooms will always be used, allowing the host discretion over who enters; no participants will be admitted until two mentors are present
- Mentors acting as hosts will be able to control screen sharing, chat and sound for all those in the session.
  - If the chat is becoming negative or distressing, we'll turn it off.
  - If a participant uses inappropriate behaviour on the video stream or chat, we might mute or remove them from the room and reach out to them individually, to talk about why those words or behaviours weren't welcome in the space, and make plans moving forward.
- We don't typically record sessions; should we decide to do that, we would require parental permission on each occasion, and would advise participants at the start that the session was being recorded and specify the purpose of the recording.
- Mentors will make clear to participants that sharing photos/footage from a digital meeting without permission would be incompatible with membership.
- FWNI will ensure that young people taking part in digital activities know who they can contact if they need support. If a young participant mentions something of concern, a mentor will follow the same guidelines as for in-person workshops, and may reach out to individuals and/or parents/guardians as appropriate, as well as seeking advice from statutory organisations if needed.

Given the fast-paced and changing nature of digital platforms and engagements, FWNI staff will remain cognisant of developments and regulations, and continue to monitor these digital policies as needed in our practice.

## Publishing

An important aspect of FWNI's creative engagements is the publication of young people's writing in diverse forms and platforms, including digital or printed text, audio or video recordings, live performances or social media posts. While this is a brilliant way to amplify young people's voices and help build their confidence, a writer's privacy and



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individual sovereignty are paramount, and FWNI will respect these at every step in the publication process.

Before digital or physical publication of young people's individual work – including via social media, videos, website, etc. – FWNI will request the writer's (and, for those under 18, parental/guardian) permission. Any digitally published material can be removed at the young person's request in the future as well.

## Photography & Filming

All staff & volunteers (and partners/suppliers, where appropriate) will adhere to the following guidelines around the use and creation of photography or videos involving children/young people:

- Ensure that clear information and/or signage is displayed when photography/filming is being used
- Ensure that consent (written or verbal) from a child or young person's guardian or carer is granted prior to any photography or filming
- Provide clear information about content and use of image
- Identify the photographer to the group or individuals
- Do not grant photographers or videographers (or anyone) unsupervised access to children or young people
- Avoid using full names without permission if image and other info about young writer(s) is used or published
- Keep identifying items (e.g. nametags) blurred or cropped out of photos and videos of general and group activity

## Staff & Volunteers

### Recruitment

FWNI is committed to equality of opportunity and recruiting on a basis free from unfair and unlawful discrimination, while ensuring that recruitment procedures do not increase or ignore potential harm to children and young people and adults at risk, nor do they compromise or put staff and volunteers at risk. There is an open recruitment process for staff positions and volunteer mentors, with all necessary checks and measures in place to safeguard every one of our participants and colleagues.

FWNI is a registered body with Access NI and requires enhanced disclosures checks on any staff or volunteers in supervisory or regular contact with children and young people under 18. Having a criminal record will not necessarily bar a person working with FWNI; this will depend on the nature of the position, and the circumstances and background of offences. Any information revealed on an Access NI Disclosure certificate will be forwarded to the recruitment panel. The decision as to the relevancy of the



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information will be theirs alone. (See also FWNI's Equal Opportunities Policy, and Employment and Volunteer Handbooks for further detail.)

FWNI monitors recruitment of all staff and volunteers by:

- Providing Job Descriptions for all staff posts (permanent and project-based)
- Requiring information about past work and volunteering experience in applications and/or covering letters
- Requiring an applicant's disclosure of any previous (unprotected) convictions or investigations
- Asking all prospective personnel if there is any reason they cannot work with children or young people
- Interviewing candidates (if applicable)
- Obtaining two written references from non-family who ideally have known the applicant for 2+ years
- Obtaining ID documents to verify identity
- Completing relevant Access NI checks (if applicable, and for all regulated activity) – and beforehand, providing the applicant with a consent form for an enhanced Access NI check
- Setting a probationary period for new staff and volunteers (if applicable)
- Ensuring all new recruits undergo a training and induction process, and that all people engaging in work or volunteering with us are familiar with both the Safeguarding Policy and procedures and also their role in upholding these

## Induction & training

### Core Staff

FWNI ensures that Safeguarding Training is included as part of the company induction programme for all staff.

### Project-based Staff & Volunteers

Induction sessions are a compulsory element of project preparation for all project-based staff and volunteers, covering all aspects of FWNI's policies and procedures, including additional elements as deemed necessary by the nature of the activity.

### Support & Supervision

FWNI fully understands that meaningful support and supervision is essential to ensure that staff and volunteers feel safe and confident in the work that they do.

1. As described elsewhere in this policy, staff and volunteers never mentor or interact alone with children and young people.
2. Staff routinely consult with each other regarding safeguarding issues and queries, and regarding their own wellbeing.
3. Safeguarding is a standing order of business at team and board meetings
4. Volunteers who take on the role of mentoring are provided with support and supervision in small groups via briefings and debriefs before and after every workshop and activity, or on a one-to-one basis periodically and as needed.



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## Breaches of Code of Conduct or Safeguarding Policy

Staff and volunteers of FWNI must understand the importance of knowing and adhering to this Code of Conduct (and indeed the full Safeguarding Policy) at all times. We ask all FWNI staff and volunteers to remember:

- If they are unsure of their actions and feel they may have breached the Code, they should consult with their Line Manager
  - If they are unsure of the actions of others, they should refer to the information in this policy regarding whistleblowing and formal complaints (p.16)
  - Breaching the Code is a serious issue that will be investigated
  - Breaching the Code may result in disciplinary action and (if required) ultimately dismissal for staff, removal from activities for volunteers, and potentially – if it constitutes harm or risk of harm – referral to the Health and Social Care Trust, the Police Service of Northern Ireland, the Disclosure & Barring System or other regulatory bodies, as appropriate.

## What is a Safeguarding Concern?

A reportable safeguarding concern is the possibility that a children or young person is suffering from harm or abuse. Most likely examples are:

1. Worrying remarks or writing made by a child or young person
2. Situations in which a child or young person has been exposed to potential risk of harm
3. Concern about the behaviour of a staff member or volunteer (e.g. inappropriate or unacceptable behaviour or language, negligence, favouritism)
4. Disclosures: when a child or young person tells you they are/have been abused or harmed in any way
5. Potential physical signs of abuse (e.g. visible and unexplained injuries, bruises, bleeding)

## Recognising abuse

Abuse can take a number of different forms:

### Physical

Deliberate physical injury to a person, or willful and neglectful failure to prevent physical injury or suffering

### Sexual

Forcing or enticing a young person to engage with sexual activity, whether or not the person is aware of what is happening; it may include physical contact, including penetrative or non-penetrative acts, or involving young people in looking at or watching pornographic material or sexual activity

### Emotional



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Persistent emotional ill treatment of a person likely to result in severe and persistent adverse effects on the person's emotional development

## Neglect

Persistent failure to meet a person's physical, emotional or psychological needs, likely to result in significant harm

## Exploitation

The intentional ill-treatment, manipulation or abuse of power and control over a child or young person; to take selfish or unfair advantage of a child or young person or situation, for personal gain

## **Bullying**

Although bullying is not defined as abuse, its more extreme forms can be regarded as abusive. Bullying can be emotional, physical, racist, sexist, sexual, homophobic or otherwise target a young person's sense of self and identity; it can happen verbally or physically, both in person and in cyber spaces. Bullying can leave children with feelings of worthlessness, self-hatred, and isolation. At its worst, bullying can result in a child or young person self-harming and even attempting suicide.

## **Honour-Based Abuse**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse and should be handled as such. Abuse in this context often involves a wider network of pressure and can include multiple perpetrators; thus it is important to be aware of this dynamic and additional risk factors when considering safeguarding actions.

## **Adults at Risk**

An adult may be at risk of harm because of their personal characteristics and/or life circumstances, which may increase exposure to harm either because a person may be unable to protect him/herself or their situation may provide opportunities for others to neglect, exploit or abuse them. FWNI recognises that adults in these circumstances have a potential susceptibility to the same types of abuse named above.

## **Disability**

Safeguards for children/young people and adults with a disability are the same as those for other children, young people and adults at risk; however certain factors can mean those with a disability are more vulnerable and could therefore be more susceptible to abuse.

## **Reporting procedures**

FWNI is aware of the importance of recording and reporting concerns, allegations or disclosures with respect to the children, young people and adults at risk with whom we work. It is not FWNI's role to investigate any concern. Staff & volunteers simply need to



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ensure all information is passed to the Designated Safeguarding Officer without delay. All concerns should be reported, no matter how insignificant the information may seem.

Our Designated Safeguarding Officer and Adult Safeguarding Champion is FWNI's Operations Manager, Emily DeDakis, who can be reached via office phone (02890991038), mobile phone (07871178805) or e-mail ([emily@fightingwords.co.uk](mailto:emily@fightingwords.co.uk)).

The Designated Safeguarding Officer and Adult Safeguarding Champion is/are responsible for acting as a source of information and support for staff and volunteers and for dealing with safeguarding concerns and allegations or suspicions of abuse that arise.

Their role is to:

- Be the first person who all staff, volunteers or members of the public approach with concerns
- Ensure that policy and procedures are implemented
- Ensure all staff and volunteers are aware of safeguarding policy and procedures, and receive appropriate safeguarding training
- Ensure that any concerns, allegations and disclosures are properly recorded and reported
- Contact statutory agencies about concerns and make referrals as necessary

### Handling a disclosure

In the case of a child/young person or adult at risk disclosing, it is important to:

- Listen attentively
- Avoid directly questioning them
- Stay calm
- Refrain from making promises or commitments you cannot keep
- Listen to everything they have to say; do not stop them from recalling significant events
- Express concern and sympathy and acknowledge what is being said
- Refrain from criticising the perpetrator(s), if they are mentioned
- Let the person know that the information will be taken seriously and provide details about what will happen next, including the limits and boundaries of confidentiality
- Explain that it may be necessary to inform others, and that they will be kept informed at every stage
- Be clear in your mind what the person has related to you, but under no circumstances interrogate them
- Ask if they have told anyone else and, if not, who would be a good person to contact
- Thank them for informing you and reassure them that they were right to do so
- Record the disclosure in writing (date and sign your report) and report as per your organisation's procedures (see below) at the earliest possible time
- Act without delay



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## **Emergencies**

If an acute or emergency situation comes to your attention regarding someone's personal safety:

- Ensure the immediate safety of the person
- If urgent medical/police help is required, call the emergency services
- If you think a crime has occurred be aware that medical and forensic evidence might be needed. Consider the need for a timely referral to the police service and make sure nothing you do will contaminate it.

## **ACTIONS FOLLOWING DISCLOSURE OF ABUSE MADE BY A CHILD, YOUNG PERSON OR ADULT AT RISK**

- Complete report form, found in Appendix A. Record the discussions accurately, factually, and as soon as possible after the event. Avoid opinion and hearsay.
- Immediately contact FWNI's Designated Safeguarding Officer; give them the report, and details of who else a copy of the report has gone to (see below).
- If at a host venue (e.g. school or nursery) make a copy of the report form and immediately contact their Designated Safeguarding Officer and give them copy of report (if required/relevant). If host venue's officer is not available, notify FWNI's Designated Safeguarding Officer, who will follow up.
- Do not discuss information with anyone else.

All reports will be held confidentially, in line with privacy and GDPR requirements, and be supplied for any further investigation. Staff and volunteers will need to make themselves available should a meeting be required.

### **If a Designated Officer is not available?**

If the FWNI Safeguarding Officer – and/or host venue's Designated Officer, if relevant – is not available, ensure a message is left for them to contact you urgently.

In this instance, you may also contact FWNI's Deputy Safeguarding Officer, Colette Thompson, educator and FWNI board vice-chair, via mobile (07920055545) or e-mail ([colettelthompson@hotmail.co.uk](mailto:colettelthompson@hotmail.co.uk)).

If you feel the matter is urgent and cannot wait you should contact the Gateway Service Belfast team during office hours (02890507000) or out of hours (02895049999), informing the Designated Safeguarding Officer you have done so as soon as possible afterwards. (Other regions' Gateway contact details available in Appendix B.)

### **In case of an allegation against a FWNI staff member**

If an allegation is made against a FWNI staff member the employee will be suspended on full pay until such time as the investigation is complete.

FWNI has dual responsibility in respect of both the child/young person or adult at risk and the worker; therefore it is recommended that the same person should not have responsibility for dealing with the safeguarding reporting issues and the employment is-



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sues. Within FWNI the safeguarding reporting will be handled by either the FWNI Designated Safeguarding Officer or Deputy Safeguarding Officer, and the employment element by the Chair of the FWNI Board of Directors. FWNI's Board of Directors will be notified when the allegation is made.

Allegations made against the Designated Safeguarding Officer should be reported directly to FWNI's Board of Directors, through the Chair.

## **Listening to feedback**

FWNI values the practice of listening – in our creative writing activities as well as in our organisational practices. Our staff will foster a culture of inclusion, transparency and openness, and FWNI is open to receiving feedback from everyone (including children and young people and their parents or guardians).

## **Whistleblowing**

Whistleblowing occurs when a member of staff or volunteer raises a concern about misconduct, illegal or underhand practices by individuals and/or an organisation; or about the way care and support is being provided, such as practices that cause harm or risk of harm to others or are abusive, discriminatory or exploitative – including situations where a staff member's or volunteer's concerns are not acted upon by the Designated Safeguarding Officer / Adult Safeguarding Champion, another relevant appointed person, or the FWNI Director.

FWNI is committed to the highest possible standards of conduct, openness, honesty and accountability. We take any form of malpractice seriously, and are dedicated to hearing and investigating concerns raised by those working within our organisation – especially with regard to instances or patterns of negligence or recklessness that could endanger the organisation, those with whom we work, or our wider community.

Should such a concern arise:

- Staff and volunteers have the option to raise concerns outside of line management structures
- Staff or volunteers will be enabled to access confidential advice from an independent source
- FWNI will, where possible, respect the confidentiality of a member of staff raising a concern through the whistleblowing procedure

It is a disciplinary matter both to victimise a bona fide whistleblower and for someone to maliciously make a false allegation.

There may be situations in which seemingly legitimate concerns or allegations turn out to be unfounded. It is important that everyone associated with FWNI knows that if they raise a concern which, through the process of investigation, is not validated, they have



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not in any way been wrong in their initial action. We encourage responsible action, and whistleblowers should be confident of support. It is everyone's duty to be vigilant in preventing abusive practices.

## Formal complaints

A complaint may arise from parents or guardians, children, young people, adults at risk, carers, volunteers or external organisations or agencies. Note that complaints pertain to issues that fall outside of safeguarding; for anyone at immediate or suspected risk, please use the safeguarding procedure outlined above.

Our points of contact for formal complaints are the same as for safeguarding issues:

- First contact: Emily DeDakis (Operations Manager)
- Alternative contact, in case the first point of contact is unavailable (e.g. on holiday) or is the subject of the complaint: Colette Thompson (FWNI Board Vice Chair)
- Should neither of them be available or appropriate to receive the complaint, the next point of contact is the FWNI Director.

Process:

- Complaints will be dealt with promptly by the person who first receives it, giving the complainant and the subject(s) of the complaint (or their advocates/representation) the chance to state their case (ideally within one week)
- If the complaint cannot be resolved at the first stage, the final decision about how to proceed with, handle or close a formal complaint lies with the FWNI Director (ideally within two weeks of initial complaint)
- Any appeal of the Director's decision must be made to the FWNI Chair (within one week of the decision in question); if the Chair deems it appropriate, the matter will be considered by a quorate meeting of the FWNI Board of Directors

Notes:

- Records of discussions and information shared at each stage of the complaints procedure should be made clearly and accurately. All information relating to the complaint should be kept confidential and stored in a secure location, and in line with the requirements around regulated activity, if relevant.
- Everyone involved, the complainant and the subject(s) of the complaint and/or their advocates, should be given the opportunity to represent their side of the case.
- All concerned should be very clear about:
  - The nature of the complaint
  - Any previous related incidents
  - Any remedial action to be taken, e.g. an apology
  - Any new behaviour expected
  - What will happen if the agreed arrangements are not adhered to.



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## Personal Information & Confidentiality

Whether to do with a safeguarding issue, a formal complaint or general information regarding staff, volunteers, applicants or participants, information will only ever be shared within FWNI on a 'need to know' basis.

- Line Managers (including Director and Project Coordinator, as appropriate) will have access to information to check that records are being made and maintained appropriately and to enable them to identify patterns of behaviour emerging from incident reporting, which might give rise to the need to make a report to the local HSC Trust in accordance with procedures outlined elsewhere in this policy.
- Staff and volunteers will be kept briefed on why and where personal information may be kept, how and when to collect it if required.
- Adults or young people providing personal information will always be briefed on why and how it will be held, and will be able to request access to any information FWNI holds about them or those in their care.
- The reason for obtaining personal information will always be child-centred and rooted in wellbeing.

## Schools & community groups

A great deal of FWNI's activities with children and young people are done in partnership with schools or established youth organisations, whose representatives (e.g. teachers or group leaders) remain responsible for their group at all times. In these cases, no personal information about individual young people will be collected or kept by FWNI (aside from anything necessary to deal with a safeguarding concern).

## Write Clubs & special projects

When children and young people attend regulated (ongoing) activities and workshops provided by FWNI – such as our Write Clubs for young people ages 13+, the Right Twig young playwrights' projects, or other special projects that involve longer-term support for young writers – it is crucial that we gather relevant information to ensure their health, safety and welfare whilst they are in our care. The basic personal details which we will seek to gather will include:

- the individuals with parental responsibility (as defined by the Children (NI) Order 1995) for the child
- the name, address and contact number of parents as well as an emergency contact number
- information about any additional needs, health issues or medication
- permission to partake in FWNI activity

The info needed for Write Clubs and other special projects will be gathered via a standard registration form; this should be completed before the child or young person attends the club or other activity, and again on a yearly basis, so that all info held by FWNI is current, and so that reasonable adjustments can be made if appropriate.



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If a young person has stopped attending Write Club over the course of a year (and not re-enrolled), their parent/guardian will be contacted. If they choose not to re-enrol for that year, their personal information will be removed and deleted from FWNI records.

We store the personal information of active participants securely, providing access only to those who directly look after these projects. Personal information will only be used to:

- communicate details about the project in question
- update parents and young writers about special writing opportunities
- ensure the wellbeing of young people

### Confidentiality

As FWNI works very closely with children, young people and their schools and families, we may naturally encounter confidential or sensitive information (that which is not lawfully in the public domain or readily available from another public source). We will always endeavor to respect the privacy of children and young people and their parents. Teachers, group leaders, and parents/guardians can share information with FWNI (if necessary), in the confidence that it will only be used to enhance the welfare of their child or young person.

Our respect for confidentiality is reflected in our following procedures:

- Parents will have ready access to the records of their own child/children, but will not have access to information about any other child
- Information given by parents to staff and volunteers will not be passed on to other adults (inside or outside the organisation) without permission, except with regard to a safeguarding concern;
- We inform parents when we need to record confidential information beyond the general personal information we keep – for example with regard to any injuries, concerns or changes in relation to the child or family, or any discussions with parents/carers on sensitive matters

### Security

We hold all written records in a secure location, accessible to authorised personnel only. Electronic records will be held on FWNI computers and also be appropriately secured by way of password protection and restricted access. Personal information regarding staff, volunteers, children and young people and any others we hold will be disposed of within timescales that are in keeping with the requirements of the General Data Protection Regulation ((EU) 2016/679), the Data Protection Act 2018 and any other applicable data protection legislation in force from time to time in Northern Ireland.

Please see our Privacy Notice for more information.



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## APPENDIX A

### SAFEGUARDING REPORT FORM

Please return to Designated Safeguarding Officer / Adult Safeguarding Champion (marked 'Confidential'):

Emily DeDakis  
Fighting Words Belfast  
Office 3, Skainos Square  
241 Newtownards Road  
Belfast  
BT4 1AF  
Office: 02890991038  
Mobile: 07871178805  
[emily@fightingwords.co.uk](mailto:emily@fightingwords.co.uk)

#### Recording Allegations or Suspicions of Abuse

Abuse of a child, young person, or adult at risk is a criminal offence. If you have a suspicion that someone is being or has been abused, or if an allegation of abuse has been made to you, it is vital that you faithfully, truthfully and swiftly record the details. It is also important that you fully comply with the Safeguarding procedures of the host organisation (school, youth club) in which you are working, FWNI's Safeguarding Policy & Procedures, and the full requirements of the law.

The following questions are designed to help you provide accurate, factual information to support any investigation. You may not be able to, and are not expected to, answer all the questions, but please try to give as much information as possible, even if you think it may not be relevant. Continue on additional sheets if necessary. Any suspicion or allegation must be directed to FWNI's Designated Safeguarding Officer / Adult Safeguarding Champion, and the Designated Officer of any host venue (e.g. school, nursery) (if applicable). Please remember you should NOT discuss the details of your concerns with any other party outside of those directly involved.

#### INFORMATION REGARDING CHILD, YOUNG PERSON OR ADULT AT RISK

Name: \_\_\_\_\_

Age: \_\_\_\_\_

Parent/Guardian's name(s) (if known) if report is regarding a child/young person:

\_\_\_\_\_

Home address, if known: \_\_\_\_\_

\_\_\_\_\_

Home Tel, if known: \_\_\_\_\_



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Are there any special factors about this person?

Are you expressing your own concerns or passing on those of someone else?  
*(If so, please record details.)*

What has prompted the concerns? Has the person directly disclosed information to you?  
Are there any physical, behavioural or indirect signs of abuse? *(include dates/times of specific incidents)*

Has the person been spoken to or spoken to anyone about this? If so, what was said?  
*(Please include what was said to them as well as by them if possible.)*



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Has anyone else been consulted or spoken to? If so, what was said?

Has anybody been alleged to be the abuser?  
*(if so, record details)*

Have steps been taken to ensure the person is safe?

Are there any other matters about which you want to alert the Designated Safeguarding Officer(s)?

Please give us your details in case we need to contact you:

Name: \_\_\_\_\_ Tel No:

\_\_\_\_\_

Address:

\_\_\_\_\_

\_\_\_\_\_



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## APPENDIX B

### USEFUL CONTACTS

<b>ACCESS NI</b>	<a href="http://www.nidirect.gov.uk/accessni">www.nidirect.gov.uk/accessni</a> 0300 200 7888
<b>ACE (Advisory Centre for Education)</b> Advice on bullying	<a href="http://www.ace-ed.org.uk">www.ace-ed.org.uk</a> <b>Helpline</b> 0300 0115 142
<b>Bullying UK</b> Good advice for children on bullying is outlined here - how to recognise it, and what to do if you are the victim or know of someone who is. For those unwilling to tell anybody, help is available on the site via email.	<a href="http://www.bullying.co.uk">www.bullying.co.uk</a>
<b>Child Exploitation Online Protection</b>	<a href="http://www.ceop.police.uk">www.ceop.police.uk</a>
<b>Child Protection in Sport Unit (CPSU)</b>	<a href="http://www.thecpsu.org.uk">www.thecpsu.org.uk</a> 0203 222 4246
<b>Childline Northern Ireland</b> Childline has helped hundreds of thousands of children in trouble or danger. Also check out their website. There are fact sheets on many subjects including bullying.	<a href="http://www.childline.org.uk">www.childline.org.uk</a> <b>Helpline</b> 0800 11 11
<b>Children's Law Centre</b>	<a href="http://www.childrenslawcentre.org.uk">www.childrenslawcentre.org.uk</a> <b>CHALKY Helpline</b> 0808 808 5678
<b>Department Of Culture Arts and Leisure</b>	<a href="http://www.dcalni.gov.uk">www.dcalni.gov.uk</a>
<b>Department of Health, Social Services and Public Safety</b>	<a href="http://www.dhsspsni.gov.uk">www.dhsspsni.gov.uk</a>
<b>Disclosure and Barring System</b>	<a href="http://www.gov.uk/government/organisations/disclosure-and-barring-service">www.gov.uk/government/organisations/disclosure-and-barring-service</a>



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<b>Domestic Violence</b>	<a href="http://www.womensaid.org.uk">www.womensaid.org.uk</a>
<b>Health</b>	<a href="http://www.kidsallergies.co.uk">www.kidsallergies.co.uk</a>
<p><b>Health and Social Care Trust Gateway Teams</b>          If you are concerned about the safety or wellbeing of a child or young person contact the Gateway Service Teams:</p> <p>Belfast HSC Trust Gateway (028) 9504 1744          Northern HSC Trust Gateway (028) 9441 3659          South Eastern HSC Trust Gateway (028) 9250 1227          Southern HSC Trust Gateway (028) 3756 4423          Western HSC Trust Gateway (028) 7161 1366</p> <p>Out of Hours Contact (028) 9504 9999</p> <p>*Regular hours are Monday to Friday, 9 a.m. – 5 p.m.</p>	
<p><b>Family Lives</b>          Advice for parents on supporting a child who is being bullied.</p>	<p><a href="http://www.familylives.org.uk">www.familylives.org.uk</a>  <b>Freephone 0808 800 2222</b></p>
<p><b>Internet Watch Foundation</b>          UK Hotline for reporting criminal online content</p>	<a href="http://www.iwf.org.uk">www.iwf.org.uk</a>
<p><b>Kidscape</b>          Operates an anti-bullying helpline for parents of bullied children with advisers available Monday-Thursday from 10am-4pm.</p>	<p><a href="http://www.kidscape.org.uk">www.kidscape.org.uk</a>          08451 205 204</p>
<b>National Children's Bureau</b>	<a href="http://www.ncb.org.uk">www.ncb.org.uk</a>
<b>NI Anti-Bullying Forum</b>	<a href="http://www.niabf.org.uk">www.niabf.org.uk</a>
<b>NI Commissioner for Children &amp; Young People</b>	<a href="http://www.niccy.org">www.niccy.org</a>
<p><b>NSPCC Child Protection Helpline</b>          Fantastic advice and guidance about general safeguarding issues and concerns</p>	<p><a href="http://www.nspcc.org.uk">www.nspcc.org.uk</a>  <b>Helpline 0808 800 5000</b></p>



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arising; great point of contact to help determine when to pass a concern on to a Gateway Team	
<b>Parenting NI</b>	<a href="http://www.parentingni.org">www.parentingni.org</a> Freephone 0808 8010 722
<b>Police Service of Northern Ireland (PSNI)</b>  Emergency Non-Emergency & General Enquiries	999 0845 600 8000
<b>Suicide and self-harm</b>	<a href="http://www.samaritans.org">www.samaritans.org</a>
<b>Volunteer Now</b>	028 90236100 Further information on developing Safeguarding policy and procedures are provided in the documents <b>Keeping Children Safe – Our Duty to Care</b> and <b>Keeping Adults Safe – A Shared Responsibility</b> , available at <a href="http://www.volunteernow.co.uk">www.volunteernow.co.uk</a>
<b>YouthNet</b>	<a href="http://www.youthnetni.org.uk/">www.youthnetni.org.uk/</a> 028 90331880
<b>Fighting Words NI</b>	Designated Safeguarding Officer Emily DeDakis (Operations Manager) Office 02890991038 Out of Hours 07871178805 E-mail <a href="mailto:emily@fightingwords.co.uk">emily@fightingwords.co.uk</a>  Deputy Safeguarding Officer Colette Thompson (Vice Chair) Office 02890991038 Out of Hours 07920055545 E-mail <a href="mailto:colettelthompson@hotmail.co.uk">colettelthompson@hotmail.co.uk</a>

## PSNI Child Abuse Investigation Units

The PSNI have the following specialist units who will investigate all reports of institutional abuse.

Child Abuse Investigation Unit	PSNI District	Address	Phone number
Antrim	D (covers Antrim, Carrickfergus, Lisburn, Newtownabbey)	24 Castle Street Antrim BT41 4JE	028 9448 2633



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Coleraine	H (covers Coleraine, Ballymorney, Moyle, Ballymena, Larne)	17 Lodge Road Coleraine BT52 1LY	028 7028 0904
Dundonald	C (covers Ards, Castlereagh, North Down, Down)	825-827 Upper Newtownards Road Dundonald Belfast BT16 1RF	028 9056 1759
Grosvenor Road	A (covers north and west Belfast)	105-107 Grosvenor Road Belfast BT12 4GL	028 9070 0604
Maydown	G (covers Foyle, Limavady, Magherafelt, Strabane)	4 Maydown Road Londonderry BT47 6SJ	028 7186 1355
Willowfield	B (covers south and east Belfast)	277 Woodstock Road Belfast BT6 8PR	028 9025 9832
Banbridge	E (covers Armagh, Banbridge, Craigavon, Newry and Mourne)	14 Castlewellan Road Banbridge BT32 4AX	0845 600 8000
Omagh	F (covers Cookstown, Dungannon and South Tyrone, Fermanagh and Omagh)	1 Derry Road Gortmore Omagh BT78 5DR	028 8225 6630

## **Regional Emergency Social Work Service (RESWS)**

### **About the Service**

The new regional out-of-hours social-work service provide an emergency social work response across Northern Ireland on an out of hours basis:

- 5 p.m. to 9 a.m. weekdays



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- 24 hours at weekends and bank holidays.

This service covers all of Northern Ireland and will replace all existing local arrangements that operated in Trusts prior to 29 May 2013.

## **Emergency Remit**

This is an emergency service to be used only when you need a social worker urgently, after hours.

Wherever you live in Northern Ireland, Out of Hours Social Workers can be contacted through one central telephone number:

**Tel: (028) 9504 9999**

## **Child Care Referral Criteria**

RESWS will accept referrals where:

- There are concerns that a child has suffered, or is likely to suffer significant harm
- There are concerns in relation to children who are Looked After by a health and social care Trust or their carers including foster carers
- There is suspected or confirmed abuse of a child.
- In cases where there is a serious and imminent risk of family breakdown both in the community, foster care or kinship placements.
- An appropriate adult is required for young people who are subject of a care order
- There is a need for authorised professionals to make an enquiry to the Child Protection Register.