



Royal College of Obstetricians and Gynaecologists

Safeguarding Policy

Document control

Author:	People Team	Accountable Executive Director:	Director of People and Organisational Development
Version:	V3	Last review date:	September 2024
Approving body:	Board of Trustees	Date of approval:	29 November 2024
Related policies:	Code of Conduct Anti-bullying and Harassment Policy	Date of next review:	September 2027

Document revision history

Version	Date	Author	Summary of changes
V1.0	January 2019	Fernando Caicedo	
V2.0	March 2021	Director of HR	Inclusion of Safeguarding Officer and clarity on responsibilities of staff
V3.0	September 2024	Alison Munday, Director of People and Organisational Development	Scheduled review and addition of clearer definitions and scope of policy

Contents

Introduction	3
Scope	3
Responsibilities	4
Safeguarding procedures	4
Risk Assessment	4
Recruitment, selection and employment	4
Dealing with a suspicion or awareness of abuse	5
Confidentiality	5
Victimisation	5
Duty of disclosure	5
Additional support and guidance	6
Contact for support	6
Appendix 1 - Guidelines on risk assessment in relation to safeguarding vulnerable groups	7
Appendix 2 - Guidelines on recruitment, selection and employment procedures for young persons	8
Legal duties.....	8
Disclosure and Barring Service (DBS) checks	9
Appendix 3 - Guidelines on dealing with suspicions or allegations of abuse	10
Definitions of Abuse	10
Detecting Abuse	10
Reporting a complaint or concern	11
Annex A – Standard Risk Assessment Form	12

Introduction

The RCOG's mission is to improve the health of women and girls in this country and around the world. We also recognise the importance of being a diverse and inclusive organisation so that everyone working for us can be their true selves at work, and are committed to taking deliberate action to ensuring everyone can thrive, feel included, valued and reach their full potential whilst working with us. We strive to ensure our mission and this commitment flow through all we do, including in our health and wellbeing policies and practices for our employees.

Safeguarding is broadly defined as the protection of a person's health, wellbeing and right to live safely, free from harm, abuse and neglect. The College is committed to the health, safety and wellbeing of its employees and those undertaking work on our behalf and to protect and safeguard the vulnerable groups with whom the College's work bring it into contact.

Vulnerable groups refer to children (those under the age of 16 years), young people (those aged 16 to 18 years) and vulnerable adults. Vulnerable adults are anyone over the age of 18 years who is at risk of abuse, harm or exploitation as a result of their age, illness, mental illness, disability or other types of physical or mental impairment.

RCOG work does not routinely involve the management or support of vulnerable groups, however, there is a duty of care where anyone working on behalf of the College, or whose work has potential implications for the College's reputation, does engage with these vulnerable groups. The College also recognises that its employees may experience care and support needs and we want to ensure they are supported effectively.

Everyone connected with the College is expected to contribute to creating and maintaining an environment that supports keeping vulnerable groups safe from harm.

The College's Safeguarding Officer is the Director of People and Organisational Development.

Scope

This policy applies to all RCOG representatives (whether acting in a paid or unpaid capacity), including staff, contract workers, people working on secondment, partners, consultants, trustees, members, trainees, visitors and volunteers, whether representing the College in the UK or overseas, in relation to work undertaken with or on behalf of the College (so excludes work undertaken when representing another organisation).

This policy relates to any RCOG representative who may encounter children, young persons or vulnerable adults (please see definitions in the policy introduction). This may be through research, professional services, Women's Network activities, examinations, advocacy, international development activities such as training for healthcare professionals and any other College-related activity.

It is supported by guidance on identifying and assessing risks so that appropriate safeguards can be put in place, how to report any suspected harm or abuse, and the process to be followed.

This policy does not cover bullying and harassment in the workplace, which is dealt with under the College's Anti Bullying and Harassment Policy.

Responsibilities

When working on behalf of the College you must:

- be familiar with the safeguarding policy and able to follow procedures if appropriate
- be responsible for your own professional conduct
- always take action according to this policy if you have safeguarding concerns
- notify the College of any unspent criminal convictions in line with the Rehabilitation of Offenders Act 1974, or any spent and unspent cautions and convictions if you are working with vulnerable groups, in line with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. You must do this both at the time of appointment and/or while working for the College. If you fail to let us know about these convictions, then disciplinary action may be taken with a potential sanction, up to and including dismissal.

The People team will be responsible for ownership and review of this policy.

Safeguarding procedures

Risk Assessment

Anyone who intends to, or may be put in the position of, working with vulnerable groups should ensure that they understand and abide by this policy before commencing any programme, event, visit or other activity. The College will also request that appropriate checks be carried out using the Disclosure and Barring Service (“DBS”), before any work involving vulnerable groups is undertaken. These checks will be required when work involves regulated activities (such as healthcare, personal care, social services or services to assist or supervise daily activities). More information on whether a DBS check is required can be found in the DBS eligibility tool, [here](#).

A designated individual (usually this will be the member of staff responsible for the activity) should complete a risk assessment before embarking on any new or changed programme, event, visit or any other College activity involving vulnerable groups.

All those involved in the risk assessment process should understand that the risk assessment is not only a way to mitigate or remove any potential risks but may also be a prompt to consider alternative working practices.

Guidelines on risk assessment in relation to safeguarding vulnerable groups are set out in Appendix 1.

Recruitment, selection and employment

The College does not employ young persons under the age of 18. However, a young person or vulnerable adult may be involved in one of the College’s volunteer roles or otherwise apply for a vacancy.

The College will take all appropriate steps during the recruitment and selection process to ensure that vulnerable groups are not exposed to undue risk. This includes where it is identified that a vulnerable person has applied for a role at the College.

Where a risk assessment has identified that staff are likely to have 'regular' contact with or encounter vulnerable groups, appropriate checks will be required.

Please refer to the guidelines on recruitment, selection and employment for appropriate procedures to support safeguarding best practice in these situations set out in Appendix 2.

Dealing with a suspicion or awareness of abuse

Concerns for the safety and wellbeing of vulnerable groups could arise in a variety of ways and in a range of different settings in the College or in another organisation with which the College is working.

If you become aware of any allegation of abuse against a member of staff, trustee, members, trainee or volunteer you must report it immediately.

Alleged cases of abuse should be reported to the appropriate Executive Director and Safeguarding Officer. If you feel uncomfortable doing this, you should report it to another member of the leadership team. You will need to provide a written summary.

In no circumstances should a member of staff attempt to investigate any safeguarding concern themselves as this may cause further harm.

The College treats all complaints of abuse seriously and recognises the sensitive nature and difficulty to raise such matters. During any investigation the College will take account of its duty of care to all parties and will take appropriate steps.

Please refer to the guidelines on detecting and reporting suspicions or allegations of abuse in Appendix 3.

Confidentiality

It is essential that confidentiality is maintained at all stages when dealing with safeguarding concerns. Information relating to the concerns and subsequent case management should be shared on a need-to-know basis only, and should be kept secure at all times.

Victimisation

If you report suspected or alleged abuse under this policy, you will be protected from any unfair or inappropriate treatment as a result. If you raise a genuine concern about suspected abuse, you will not face action if the concern proves unfounded. Anyone who makes false and malicious accusations, however, may face disciplinary action. Please refer to RCOG Anti Bullying and Harassment Policy.

Duty of disclosure

The College is legally required to send information to the DBS or Disclosure Scotland if a decision is taken to dismiss an employee or remove them or any other individual, including trustees, members, volunteers and others, from working in regulated activity/work, where the reason for dismissal relates to safeguarding.

The College may also be required to inform the DBS or Disclosure Scotland if the College suspends an employee, or an employee or other individuals resigns pending investigation.

Additional support and guidance

Employees who want further information on safeguarding are encouraged to contact their line manager or the People team. The College will provide support and guidance when it comes to safeguarding and the duty to protect vulnerable groups from harm.

For further guidance on what constitutes abuse and how to detect it, see Appendix 3.

Contact for support

For further advice regarding any aspects of this policy, please contact the [People team](#):

Address	10 – 18 Union Street, London, SE1 1SZ
Email	people@rcog.org.uk

Appendix 1 - Guidelines on risk assessment in relation to safeguarding vulnerable groups

There are no fixed rules on how a risk assessment should be carried out. A standard template is included as Annex A, which can be adapted or modified as required.

When completing a risk assessment you should carefully examine what, in your area of work, could cause harm to people and assess whether you have taken enough precautions or should do more to prevent harm.

This process should include:

Considering the different types of contact that College representatives may have with these vulnerable groups. The assessment should relate to the person doing the activity, not whether it is always with the same vulnerable individual.

Identifying the nature, length, frequency, intensity and time of any contact and where there is little or no possibility of the activity being supervised or observed by others.

Considering how to minimise occasions where a single adult is in the company of an individual in a vulnerable group.

Identifying any potential risk areas and detail actions to mitigate or remove the risk. This part of the process may involve consideration of alternative working practice.

Recording your findings and keeping a copy of the risk assessment form on file for future reference or use. Provide a copy to the People team and your line manager. It is good practice to review your risk assessment as required.

Appendix 2 - Guidelines on recruitment, selection and employment procedures for young persons

The College does not employ young persons under the age of 18. However, potentially a young person may be involved in one of the College's volunteer roles or otherwise in agreed activities, or apply for a vacant role. In such circumstances the following duties apply.

Legal duties

There are a number of restrictions affecting the employment of children and young people (i.e. those under 18 years of age), mostly relating to health and safety, working hours and training. To ignore these restrictions may amount to abuse.

- Before school-leaving age, the work they can do is restricted and depends on their local authority.
- A young person can start full-time work once they've reached school leaving age.
- Between their school leaving age and 18, a young person in England must do one of the following:
 - full-time education or training, such as school or college
 - work-based learning, such as an apprenticeship
 - working or volunteering (for 20 hours or more a week) while in part-time education or training.

Under the Employment Rights Act, an employee aged 16 or 17 has a right to take time off work for study or training which leads to a relevant qualification. They may take a reasonable amount of time, taking into account the nature of the training or study and the needs of the employer.

Under the Working Time Regulations 1998 young people employed as young workers are entitled to:

- a health and capacities assessment before being required to perform night work, and periodically thereafter
- a minimum daily continuous rest period of 12 hours
- two days rest taken together per week (these will usually fall on the weekend)
- a minimum 30-minute rest break after four and a half hours of continuous work.

The Working Time (Amendment) Regulations 2002 give further protection to those aged 16 and 17:

- Working time is limited to 40 hours per week.
- The maximum working day is eight hours.
- Night working is prohibited under normal circumstances.

Under the Management of Health and Safety at Work Regulations 1999, employers must ensure that young persons are protected at work from any risks to their health or safety because of their age and inexperience, and must not be given work which is beyond their physical or psychological capacity.

Disclosure and Barring Service (DBS) checks

Members of staff who will be regularly training, supervising or working alongside a young person or vulnerable adult on a one-to-one basis in the normal course of their duties may require a DBS check. In addition to the DBS checks, the College will check for records of relevant criminal convictions where substantial one-to-one contact with vulnerable groups applies in relevant roles. In certain cases, it may be necessary to ask an employee to advise the College if they have any relevant existing or spent convictions, further guidance on this can be found [here](#). Advice **must** always be sought from the People team before doing so.

Appendix 3 - Guidelines on dealing with suspicions or allegations of abuse

Definitions of Abuse

Abuse under the policy on safeguarding vulnerable groups includes¹:

- physical abuse, including hitting, slapping, pushing, kicking, or inappropriate sanctions
- sexual abuse, including encouraging relevant individuals to look at pornography, harassing them by making sexual suggestions or comments, or sexual acts where the individual has not consented, or could not consent or was pressured into consenting
- psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks
- neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating; and financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- discriminatory abuse, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

Detecting Abuse

Suspicious of abuse or actual abuse may be raised in a number of ways:

- An individual in a vulnerable group may tell you that they are at risk, being abused or an abuser.
- A colleague may tell you that they have witnessed or suspect abuse or have been told by an individual in a vulnerable group that they are being abused.
- An individual may display signs of abuse, such as physical injury or exchanges in behaviour or mood.
- A colleague may confide in you that they have abused an individual.

It is essential to act quickly and professionally in all cases of suspected abuse.

In no circumstances should you attempt to investigate or deal with any suspicion or report of abuse yourself.

To assist in the reporting procedure please ensure that you:

- make time and are open to discuss any concerns
- listen carefully

¹ Adapted from the Department of Health 'No Secrets' publication. See http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4008486

- take it seriously
- reassure the individual that they are right to tell
- find help quickly
- make careful records of what was said using the individual's own words as soon as is practicable following the disclosure. Date, time and sign the record. This record would be used in any subsequent formal disciplinary action or legal proceedings.

If you suspect abuse has taken place or abuse has been brought to your attention you are obliged to take action and report this.

Reporting a complaint or concern

You should immediately report any suspicion or allegation of abuse to the appropriate Executive Director and the Safeguarding Officer.

Once a complaint has been received, the Executive Director and Safeguarding Officer will take action in line with the appropriate organisational policy. If an investigation is required, this will follow the Disciplinary Policy and Procedure. Where an allegation of abuse is made against someone, it may be necessary to suspend them in line with the Disciplinary Policy and Procedure.

The Executive Director with the support of the Safeguarding Officer may:

- ensure appropriate support has been provided locally to the individual
- report the suspicion or allegation to the relevant agencies who may include the Police and/or Social Services and/or Disclosure and Barring Service ("DBS") as appropriate
- make a written record of the person at any of these agencies to which the case is reported
- provide appropriate support for the person against whom the allegation has been made
- confirm to the individual who originally reported the allegation that action has been taken.



Annex A – Standard Risk Assessment Form

Completed by:

Date of risk assessment:

Department Name:

Activity	Risks	Precautions	Emergency Procedures (if required)	Training requirements

You should review your risk assessment if you think it might no longer be valid.