

PTC Community Standards (Safeguarding) Policy

Document last updated: September 2024, Sam Dodd (DSL)

INTRODUCTION

Safeguarding, Care, and Mental Health (Community Standards)

Safeguarding has a specific, legal meaning. Some of the PTC's concerns shade into the wider arena of mental health awareness and care.

In developing these procedures we aim to provide a framework for both **Safeguarding** and a wider sense of **care** for our staff, freelancers and participants.

Safeguarding will concern our legal duty to prevent harm while **care** will consist of working to create a supportive context for a discussion that empowers participants to find their own level of comfort. The PTC's Safeguarding and Care Code of Conduct can essentially be seen as a declaration of intent or preamble on how the PTC handles concepts of care. The Procedure Document is the guideline for how the PTC handles safeguarding risks and concerns.

The responsibility for safeguarding at the PTC is organisational, not on the individual. This means that the PTC is responsible for having visible and transparent safeguarding policies evidenced in publicly available documentation on our website.

Mental Health First Aid is part of our safeguarding remit, but we are not medical professionals, nor are we a mental health charity or counselling service. If a safeguarding concern arises at a PTC event or in a PTC space it will not be ignored, but we will direct the person concerned onto the right service. The PTC's position is that offering more direct care than this would be irresponsible—it is not our speciality or stated aim, and we do not have the training or expertise to do this. We also have a responsibility towards ourselves to not expect staff and freelancers to take on more than they are reasonably able to.

The safeguarding concerns most likely to happen in a PTC-specific context are explored and accounted for in the Procedure Document and Events Boilerplate.

Health & Safety is a separate responsibility for PTC, and our policy document for this can be found on the Policies webpage on our site.

Also on our Policies webpage, you can find a map of safeguarding agencies—local, regional, national and international.

PROCEDURE & REPORTING A SAFEGUARDING CONCERN

The PTC places a mandatory obligation on all employees, volunteers, interns, consultants, partner agencies, sub-grantees, and visitors to our projects to immediately report concerns, suspicions, allegations, and incidents which indicate actual or potential abuse of any kind, sexual violence including sexual harassment, sexual exploitation or any behaviour which suggests this policy may have been breached.

It is not the responsibility of the person reporting the concern to decide whether abuse has taken place. The responsibility is to report facts to the DSL, so that the procedure for dealing with suspected or actual incidents of abuse can be initiated.

In responding to an incident of abuse, sexual exploitation or sexual violence PTC will take a survivor-centred approach. A survivor-centred approach aims to ensure that anyone who has been the target of abuse, sexual exploitation or sexual violence is treated with dignity and respect and that the person's rights, privacy, needs, and wishes are respected.

Every person who carries out events or workshops for the PTC should know their responsibilities, the flow of work they need to carry out, and who they need to report to or can ask for support with safeguarding issues, including whose duty it is to make referrals, field a safeguarding concern, and fill out paperwork.

For this we have a dedicated procedure document.

DATA PROTECTION AND DOCUMENT RETENTION

Data on recorded safeguarding concerns will be kept for 6 years after the date of last contact, in line with the PTC's Data Policy and Document Retention Procedure, and with Data Protection Act 2018 legislation.

SCOPE OF SAFEGUARDING

Who is safeguarding for in a PTC context:

- Vulnerable adults
- Refugees and asylum seekers
- People from marginalised communities
- Traumatized individuals
- Children and young people (CYP)
- PTC staff and freelancers

What parts of our programme are affected:

- Events participants
- Workshop participants
- UNDERTOW participants
- Radical Approaches Reading Group participants
- School programme participants

CHILDREN AND YOUNG PEOPLE

All employees, volunteers, consultants, trustees, guests, observers, and anyone associated with PTC must always:

- Treat children with respect, value their views and take them seriously
- Use positive, non-violent methods to support and manage children's behaviour
- Maintain professional boundaries and consider how language and actions may be perceived by children
- Wherever possible follow the 'two-adult rule' while conducting activities that involve children ensuring that two or more adults supervise all activities and are always visible and present. Where a practitioner is working with a child with disabilities who has personal care requirements, the practitioner should

work with the child and their parents or carers to discuss how the 'two-adult rule' will work, document this consultation process, and collect informed consent/assent

- Report any concerns about the welfare of a child

All employees, volunteers, consultants, trustees, guests, observers, and anyone associated with the PTC must never:

- Act in ways that may be or be perceived to be abusive or exploitative (physically, emotionally, neglectfully, or sexually) towards children
- Have sexual intercourse or participate in any form of sexual activity with any person under 18 years old or under the local age of sexual consent (whichever is higher). Mistaken belief in the age of the child is not a defence
- Abuse their position of power to withhold professional assistance or give preferential treatment to children or behave in any way that discriminates against children
- Use physical punishment/discipline towards children (e.g., hitting, corporal punishment)
- Use any form of technology (e.g., computers, mobile phones, digital cameras) to exploit, harass or bully children
- Use any form of technology to access, view, create, download, or distribute indecent images of children (e.g., pornographic images of children)
- Communicate with a child via digital platforms (e.g., Facebook Twitter, Instagram), mobile technology (WhatsApp, Skype, texting) or online without consent and knowledge of his/her parents or caregiver
- Fail to disclose any convictions or child-related investigations that they are subject to or have been subject to
- Agree with a child to keep a secret which has implication for their safety or the safety of other children
- Fail to report concerns relating to children
- Condone or participate in behaviour towards children which is illegal, unsafe, harmful, or abusive in any way or condone or participate in any child-related activity which is illegal, exploitative, unsafe, or abusive
- Make children run errands for financial gain or otherwise, or use them to solicit support
- Use language towards children that is inappropriate, harassing, abusive, sexually provocative or that is intended to shame, humiliate, or emotionally abuse
- Promote any form of child labour or recruit children for any labour which is inappropriate to their age or developmental stage which interferes with

- their time available for education and recreational activities or which places them at risk of injury
- Do things for children of a personal nature that they can do for themselves (e.g. dressing, toileting). Where a practitioner is working with a child with disabilities who has personal care requirements, the practitioner should work with the child and their parents or carers to discuss how the 'two-adult rule' will work, document this consultation process and collect informed consent/assent
 - Seek to make contact or spend time with any child who they come into contact with as part of their work, except as part of the designated activities set out in their role. For example, an employee or volunteer or other representative should not visit the home of a child alone or invite unaccompanied children into their own accommodation
 - Take children to their home or sleep in the same room or bed as a child

INTERNATIONAL CONCERNS

The PTC works with a lot of poets, translators, attendees and participants, who live abroad or whose country of origin is not the UK. International safeguarding is not specifically within the PTC's remit, and countries worldwide vary enormously in their approach to safeguarding and the types of national agencies available. Many countries do not even have a word for safeguarding, so provision and dedicated, targeted support is difficult to find. However, there are some international agencies who tackle safeguarding across borders, and these are listed in The PTC's Safeguarding Agencies Map that the PTC uses and directs attendees and participants to, at events in-person or online. This resource can be found as a downloadable document on our Policies webpage.

RECRUITMENT

PTC is committed to recruiting employees, volunteers, and other representatives safely in line with its EDI & Recruitment Policy. All roles will be specifically evaluated for safeguarding risk to determine the level of background-checking required. Employment offers or volunteer agreements are conditional depending on satisfactory background-checking and no individual will begin service with the PTC until all background checks have been done and returned satisfactory results. Checks, although not by themselves a guarantee of safety, are mandatory. The PTC

recognises that no form of checks can substitute for adequate supervision and management.

PRINCIPLES OF COMMUNITY STANDARDS AND SAFEGUARDING

Empowerment

People are supported and encouraged to make their own decisions. The PTC will:

- Have a clear process for safeguarding issues to be handled
- Ensure people entering this process give informed consent, apart from when they are unable to give consent and there is an immediate risk to life
 - For CYP, consent is not legally required. Any disclosures of abuse will be immediately reported to the relevant authorities
- Will seek input from people entering this process
- Participants' input will directly inform the outcome
- Participants can choose how much of the process they want to participate in

Prevention

It is better to act to avoid problems before harm occurs. The PTC will:

- Nominate a responsible person
- Make our community standard (safeguarding) policy public and easily accessible
- Train and empower its staff & freelancers
- Have clear guidelines for staff and participants
- Make risk assessments for all events
- Flag high-risk events & situations to the PTC's DSL

Proportionality

The least intrusive response to the risk presented. The PTC will:

- Balance risk and intrusion in considering our safeguarding response
- Use risk assessments to make any necessary changes to event plans

Protection

Support and representation for those who need it. The PTC will:

- Provide help with reporting issues
- Help people taking part in the safeguarding process
- Clearly identify who will provide help
- Facilitate good communication

Partnership

Work with other organisations and local authorities where appropriate to provide support. The PTC will:

- Ascertain for each event, workshop, or series of events, who is responsible for safeguarding—the PTC, or the partnership organisation
- Ensure we share a copy of the PTC’s community standards (safeguarding) policy including contact details for our DSL if it is the former; or that we receive a copy of the partner’s safeguarding policy including contact details for their DSL if the latter
- Ensure we carry out a risk assessment, along with sharing our policy and procedure documents with their DSL, even when the partner organisation is also carrying out their own
- Where the PTC is the SG lead, ensure the PTC’s Safeguarding Code of Care & Conduct is signed and returned. Where the partner organisation is the SG lead, ensure theirs is shared with us, signed by us, and returned

Accountability

Accountability and transparency in delivering safeguarding. The PTC will:

- Have a clear procedure in place
- Have a clear referral pathway in place
- Ensure everyone understands their role, how to raise a concern, and who/how to contact the responsible person/s
- Participants clearly understand each person's role in the process

REVIEWING OUR PROCESSES

The PTC Community Standards (Safeguarding) Policy document

Government guidance recommends that we review our Community Standards (Safeguarding) Policy document at least once a year, when we start a new activity, change approach, or following any Serious Incidents reported to the Charity Commission.

The DSL will review all documents annually with any changes in SG law considered alongside review of any SG concerns raised during that year, any significant staff turnover or hire, and any significant programming or activity changes, to ascertain whether the processes need updating.

If changes are necessary, they will be made and presented to the team, followed by trustees at the next board meeting.

If the changes are significant, and cannot easily be conveyed in a brief session, a training session will be organised for the team and board (see next section).

TRAINING

Training will be provided by the DSL or an external safeguarding consultancy to PTC staff who lead on event and workshop delivery, and the board-responsible person, to help them understand:

- The PTC Community Standards (Safeguarding) Policy document
- Who is at risk
- The risk assessment process
- Reporting process
- Their responsibilities & what support is available
- The principles of safeguarding
- Updates to British law or Charity Commission guidelines on safeguarding

This will be delivered as and when required, according to the previous section.

NOMINATED SAFEGUARDING PEOPLE

The PTC has two nominated safeguarding people, a Designated Safeguarding Lead (DSL) staff member, and Trustee Safeguarding Lead (TSL) trustee. As of April 2024, these people are:

- Safeguarding concerns will be reported to DSL, *Sam Dodd*.
- Support for triage, referrals, and reporting is TSL, *Janet Remington (interim)*.



Poetry Translation Centre
The Albany, Douglas Way
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www.poetrytranslation.org
hello@poetrytranslation.org

The DSL is supported by the Director and the TSL.

Finally, any safeguarding concern can be reported to the PTC by emailing safeguarding@poetrytranslation.org

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This Policy was originally written by Bern Roche-Farrelly and Bohdan Piasecki in 2021, then expanded and adapted by Sam Dodd in September 2023. Main resource used for adaptation: [VSO International's Safeguarding Policy](#).