

OUR SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY

Revision History

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1 POLICY STATEMENT

Disability Positive (*hereinafter referred to as the “Company”*) recognise their responsibility to protect children and adults at risk from all types of abuse.

The Company has a responsibility to protect children and adults at risk of harm and to ensure their rights as individuals not to be harmed, physically or psychologically whilst accessing Company services. This can be achieved through adherence to specific contract clauses, safer staffing guidelines, appropriate training and development and adequate monitoring of service delivery.

All staff must demonstrate they can work together with individuals, families and other organisations in making sure that the needs and welfare of children and adults at risk remains paramount.

The Company has an obligation to protect children and adults at risk and to report incidents of actual or suspected harm or abuse to the relevant authorities. Failure to meet these obligations may lead to prosecution of both individual members of staff and the organisation.

All staff are expected to read and understand the contents of this policy and to ensure that their training in regard to safeguarding procedures and practices are up to date and current.

2 PURPOSE

The purpose of this policy is to ensure a professional and consistent approach to safeguarding of children and adults at risk in line with the Children and Families Act 2014 and the Care Act 2014.

This policy sets out the commitment of the Company to provide a safe and supportive environment for all of its staff and customers within the local community.

3 DEFINITIONS

The principles of this policy apply equally to children under the age of 18 years old and adults at risk, aged 18 years or over, who may be unable to take care of themselves, or protect themselves from harm.

An incident of harm refers to any incident reported to or witnessed by staff during their work whether these have occurred on Company property, at a customer's home, or within the local community. It also covers incidents that have involved staff where harm is alleged to or has been seen to occur.

Harm is most broadly defined as being all harmful contact or behaviour, but more specifically is conduct which causes:

- physical harm - physical abuse

- serious neglect
- psychological/emotional abuse – e.g. verbal abuse about gender, sexuality, race etc
- sexual abuse
- unlawful conduct which appropriates or adversely affects property rights or interests e.g. theft
- conduct by another person that leads to self-harm

Staff must be alert to the signs of abuse and neglect. The types of abuse and signs of abuse are set out in the **Staff Guidance as Appendix 1 of this policy**

4 SCOPE

This policy applies to all staff within the Company (*meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the Company in the UK or overseas*).

Adherence to this policy is mandatory and non-compliance could lead to disciplinary action.

5 POLICY PRINCIPLES

- The Company recognises its obligation to protect children and adults at risk of harm from instances of physical, psychological/emotional, sexual abuse and other unlawful conduct
- The Company will ensure that concerns are reported in a timely manner to all relevant authorities and seek to ensure that partnership working is fostered between those agencies and the Company.
- The Company will ensure that induction of new staff, volunteers and trustees will include information on all relevant policies and procedures.
- The Company will ensure mandatory annual training on safeguarding children and adults at risk is carried out with all staff.
- The Company has in place a named Safeguarding Officer and Safeguarding Lead, they are the first point of contact in all instances of actual or suspected harm.
- It is the responsibility of the Safeguarding Officer and Safeguarding Lead to collectively review all cases and decide on the action to take regarding referral to an external agency.
- The Company has a clear recruitment and selection policy and training and development policy for all staff which take account of the need to safeguard children and adults at risk.
- The Company expect all external agencies that we work with to comply contractually with the policy.
- The Company will ensure that all fundraising activities are ethical. Fundraising activities are carried out in accordance with the Company's values and we strive to meet the highest of ethical standards.
- The Company conduct a rolling programme of Disclosure and Barring Service Checks on all relevant staff who work directly with children and adults at risk.

6 MANAGING RISK

Use Company and evidenced based risk assessment tools to guide decision making and gain an understanding the risks posed to the individual and other members in the family.

In line with the **Risk Management Policy**, risk assessments should consider any prior incidents of abuse as well as the impact the alleged abuse is having on the child or adult at risk such as their level of fear and any coercive controlling behaviour. The risks and circumstances can change suddenly therefore any safety planning must include how the individual can inform the Company when they feel the risk has increased.

7 REPORTING A CONCERN

The signs of child or adult at risk abuse might not always be obvious and a child or adult at risk might not tell anyone what is happening to them. Staff should therefore record unusual behaviours and capture the views of the child or adult at risk, if appropriate. The types of abuse and signs of abuse are set out in **Appendix 1 -Staff Guidance, of this policy**

If a child or adult at risk reports that they are being abused or neglected, they must be listened to and have their allegation taken seriously. They should receive reassurance that they have done the right thing by telling someone.

If a child or adult at risk is in immediate danger the police must be contacted. If there is not a risk of immediate danger, the basic facts of the concern should be recorded in the individuals own words and where necessary, consent gained from the child or adult at risk to refer the matter to a third party. However, it will be the role of social workers and the police to investigate cases and make a judgement on whether there should be a statutory intervention and/or a criminal investigation. **A process flowchart is set out in Appendix 2 of this policy.**

You should record, in writing, all concerns and discussions about a child or adult's welfare, on a **Safeguarding Record of Concern Form as set out in Appendix 3 of this policy.**

If an allegation relates to a Company staff member, then you should record in writing the nature of the allegation on a **Safeguarding Record of Allegation against a Worker as set out in Appendix 4 of this policy** and refer immediately to the Chief Executive Officer, or if the allegation relates to the Chief Executive Officer, refer to the Chairperson of the Board of Trustees.

The Company also has a **Whistle Blowing policy** which is detailed within the Employee handbook. This enables individuals to raise concerns anonymously.

If the referral is connected to Domestic Abuse/Domestic Violence, then you should also complete a **Domestic Abuse/Domestic Violence risk matrix** as part of the referral.

Summary of Do's and Don'ts

Do:

- Make it clear that you cannot be asked to keep a secret;
- Listen to the child, young person or adult.
- Let them express their views and feelings without interruption; accept what they are saying;
- Reassure the child, young person or adult that they have done the right thing in telling someone;
- Explain that you must pass this information on;
- Make notes of what was said using the child, young person or adults words whenever possible;
- Speak to the Safeguarding Officer;

Do not investigate any allegation

Do not:

- Show shock or disbelief;
- Agree to keep the disclosure a secret;
- Make a promise or suggestion that you can stop the abuse;
- Ask questions seeking further detail – you risk contaminating evidence;
- Investigate any allegation – specially trained professionals undertake this role;
- Contact the alleged perpetrator;
- Discuss with any third party outside of the organisation;
- Make any statement or comment to the press.

8 SAFE RECRUITMENT PRACTICES

The Company adheres to the legislative requirements for employing and maintaining safer staff and as set out in the Company **Recruitment and Selection Policy**.

To ensure staff employed by the Company do not pose a risk to service users, the Company will require (minimum) enhanced three-yearly DBS disclosures for all staff completing a regulated activity with children and/or adults at risk. An appropriately rigorous approach to scrutinising candidates is made when recruiting staff and volunteers. Post holders with increased contact with children, adults at risk or personal and sensitive information receive appropriate supervision from their manager or Safeguarding Officer should they need to respond to safeguarding issues.

9 SAFEGUARDING TRAINING

To ensure staff employed by the Company have a sound understanding of safeguarding children and adults at risk, the Company deliver mandatory Safeguarding training for all staff on an annual basis. The training covers: types of abuse, signs and symptoms of abuse, raising concerns, referring/reporting to statutory bodies.

In addition, the Company deliver an annual workshop to all staff to explain the internal processes and procedures for making referrals and ensuring that staff are confident to raise a concern. Further details on Company training and development can be found in the **Training and Development policy**.

10 CONFIDENTIALITY AND DATA PROTECTION

The Company respects an individual's right to personal privacy and will maintain confidentiality as far as possible. However, for the purposes of protecting an individual from serious harm there may be times when information has to be shared without consent of the individual. The degree of confidentiality will be governed by the need to protect the child or adult at risk about whom concern has been made and will comply with the requirements of the General Data Protection Regulations.

Information will normally be shared with the consent of the individual. However, in relation to issues Safeguarding, where there are serious concerns information may need to be shared without consent but will be done so in line with our legal responsibilities. At all times, information shared will be relevant, necessary and proportionate to the circumstances, and limited to those who need to know.

11 RESPONSIBILITIES

The Company expect all staff to take personal responsibility for the application of this policy. As part of your induction, you are expected to read and familiarise yourself with this policy, ensure that this policy is properly observed and fully complied with. The Company will also ensure that all staff are provided with the time, resources and support to learn and understand the Safeguarding policy and expectations.

Management are responsible for overseeing compliance with the principles of this policy and are responsible for ensuring all staff are trained and comply with the requirements of this policy within their own teams. Management are responsible for implementing and monitoring this policy.

The Training and Volunteer Manager is responsible for monitoring the training of all staff in relation to this policy.

It is the responsibility of the Safeguarding Officer in consultation with the Chief Executive Officer (Safeguarding Lead) to report appropriate cases to the relevant external agency in a timely manner and to support the staff member involved throughout the process of referral. In addition, the Safeguarding Officer reports to the Chief Executive Officer on a quarterly basis any patterns or reoccurring issues. An overview safeguarding report is presented to the Board on an annual basis and may also be reported to the relevant Local Safeguarding Board. The Chief Executive Officer has the overall responsibility for safeguarding children and adults at risk.

APPENDIX 1 - GUIDANCE FOR STAFF

TYPES OF ABUSE

Physical abuse is the infliction of pain or physical injury, which is either caused deliberately, or through lack of care. It may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a carer fabricates the symptoms of, or deliberately induces, illness in a child or adult at risk.

Sexual abuse is the involvement in sexual activities to which a child or adult at risk has not consented or does not truly comprehend and so cannot give informed consent, or where the other party is in a position of trust, power or authority and uses this to override or overcome lack of consent. It may involve physical contact, including assault by penetration (for example, rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

It may also include non-contact activities, such as involving a child or adult at risk in looking at, or in the production of, sexual images, watching sexual activities or encouraging behaviour in sexually inappropriate ways.

Psychological or Emotional Abuse are acts or behaviour, which cause mental distress or anguish or negates the wishes of the child or adult at risk. It is also behaviour that has a harmful effect on their emotional health and development or any other form of mental cruelty. It may involve conveying to child or adult at risk that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child or adult at risk opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate or preventing the child or adult at risk participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another. It may involve serious bullying including cyber bullying, causing a child or adult at risk to frequently to feel frightened or in danger.

Neglect or Self-neglect is the repeated deprivation of assistance that the child or adult at risk needs for important activities of daily living, including the failure to intervene in behaviour which is dangerous to the child or adult at risk or to others. It may involve denial of medication, lack of adequate food, clothing and shelter (including exclusion from home or abandonment); or neglect of, or unresponsiveness to, an individual's basic emotional needs.

Female Genital Mutilation partial or total removal of the external female genitalia, or other injury to the female genital organs for non- medical reasons. FGM has no health benefits, and it harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and interferes with the natural functions of girls' and women's bodies.

FGM is recognized internationally as a violation of the human rights of girls and women. It reflects deep-rooted inequality between the sexes, and constitutes an extreme form of discrimination against women.

The practice also violates a person's rights to health, security and physical integrity, the right to be free from torture and cruel, inhuman or degrading treatment, and the right to life when the procedure results in death

Modern Day Slavery is the bringing of individuals into the country, sometimes without proper immigration arrangements, for a variety of illegal purposes which can include domestic service, illegal adoption, organ harvesting, benefit claims or prostitution. It can also be a child or adult at risk in the UK, being forced to illegally work against their will in many different sectors, including brothels, cannabis farms, nail bars and agriculture. It may include:-

- Child trafficking - Young people (under 18) are moved either internationally or domestically so they can be exploited
- Forced labour/Debt bondage - victims are forced to work to pay off debts that realistically they never will be able to. low wages and increased debts mean not only that they cannot ever hope to pay off the loan, but the debt may be passed down to their children
- Forced labour - victims are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence to them or their families. it can happen in many sectors of our economy, from mining to tarmacking, hospitality and food packaging
- Sexual exploitation - victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. whilst women and children make up the majority of victims, men can also be affected. adults are coerced often under the threat of force, or another penalty.
- Criminal exploitation - often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pick pocketing against their will.
- Domestic servitude - victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.

Domestic Abuse/Violence is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it is not just physical violence – domestic abuse includes any emotional, physical, sexual, financial or psychological abuse between adults, aged 18 and over, who are or have been intimate partners, or family members, regardless of gender and sexuality. Family members are defined as mother, father, son, daughter, brother, sister and grandparents, whether directly related, in-laws or step-family. Acts such as forced marriage and other so-called 'honour crimes', which can include abduction and homicide, can also come under the definition of domestic violence.

It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.

Adults at risk can experience abuse as outlined above but there are several other types of abuse that are particular to adults at risk. These include financial abuse (sometimes called 'material abuse'), discriminatory abuse and institutional abuse.

Financial or Material Abuse is the inappropriate use, misappropriation, embezzlement or theft of money, property or possessions. Adults at risk can be prey to people taking advantage of them by taking gifts of money, food and other items from them, when the adult has little idea of their true value, does not realise this will leave them with insufficient means or believes that the people they are helping are their friends. Such abuse may also involve the use of a position of authority or friendship to persuade a person to make gifts, to leave legacies or change a will.

Discriminatory Abuse is any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation etc. Discrimination may be a motivating factor in other forms of abuse. It may involve use inappropriate "nick names", use of derogatory language or terminology, a lack of understanding of a person's needs, or enforce rules or procedures which undermine the individual's well being.

Institutional Abuse is the mistreatment or abuse of an adult at risk by a regime or individuals within an institution (e.g. hospital or care home) or in the community, for example, care provided in a person's home. It can be through repeated acts of poor or inadequate care and neglect or poor professional practice and is more about the needs of the organisation rather than the needs of the person. Often, institutional abuse involves poor policy and procedures and a failure to implement them appropriately and in a manner, which promotes the safety and wellbeing. It may also involve misuse of medication, misuse of moving and handling techniques or abuse of civil rights including the denial of, or coercive influence on, an individual's rights to be registered and to vote, the right to be treated as an equal with dignity and respect, the rights of freedom of speech or movement, or the right to personal choice regarding their care.

Hate crime This is an act of violence or hostility directed at people because of who they are or someone things they are. For example, a person is disabled or thought to be gay/lesbian.

Radicalisation and violent extremism The central government Prevent strategy raises the specific need to safeguard children, young people and adults at risk from radicalisation which may lead to violent extremism. The counter – terrorism and Security Act 2015 places a duty on professionals to have due regards to prevent people from being drawn in to terrorism.

SIGNS OF POSSIBLE ABUSE IN CHILDREN AND ADULTS AT RISK

The following signs could be indicators that abuse has taken place but should be considered in the context of the individual's whole life.

Physical

- Injuries not consistent with the explanation given for them;
- Injuries that occur in places not normally exposed to falls, rough games, etc.;
- Injuries that have not received medical attention;
- Reluctance to change for, or participate in, physical activities, games or swimming;
- Repeated urinary infections or unexplained tummy pains;
- Bruises, bites, burns, fractures etc. which do not have an accidental explanation*;
- Cuts/scratches/substance abuse*.

Sexual

- Any allegations made concerning sexual abuse;
- Excessive preoccupation with sexual matters and/or detailed knowledge of adult sexual behaviour;
- Age-inappropriate sexual activity through words, play or drawing;
- Child who is sexually provocative with adults;
- Inappropriate bed-sharing arrangements at home;
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations;
- Eating disorders - anorexia, bulimia.*

Psychological / Emotional

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging;
- Depression, aggression, extreme anxiety;
- Nervousness, frozen watchfulness;
- Obsessions or phobias;
- Sudden under-achievement or lack of concentration;
- Inappropriate relationships with peers and/or adults;
- Attention-seeking behaviour;
- Persistent tiredness;
- Running away/stealing/lying.

Neglect or Self-Neglect

- Under nourishment, failure to grow, constant hunger, stealing or gorging food;
- Untreated illnesses;
- Inadequate care, etc.;
- Smelly and wearing the same clothes that appear unwashed
- Hoarding

Modern Day Slavery

- Signs of physical or emotional abuse
- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community
- Seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

Domestic Abuse/Violence

- Someone appearing frightened of their partner or family member
- A partner or family member who speaks for or over someone who can speak for themselves
- Someone treating their partner aggressively
- Injuries, bruising, repeated presentations for physical or mental health needs that have no identified cause
- Very low confidence
- Increasing dependency where it is not needed
- Isolation from family and friends
- Physical damage to property
- Abuse of alcohol by the victim and/or perpetrator
- Changes in behaviour/demeanor with no apparent reason

Financial

- Having unusual difficulty with finances
- Not having enough money
- Being too protective of money and things they own
- Not paying bills
- Not having normal home comforts

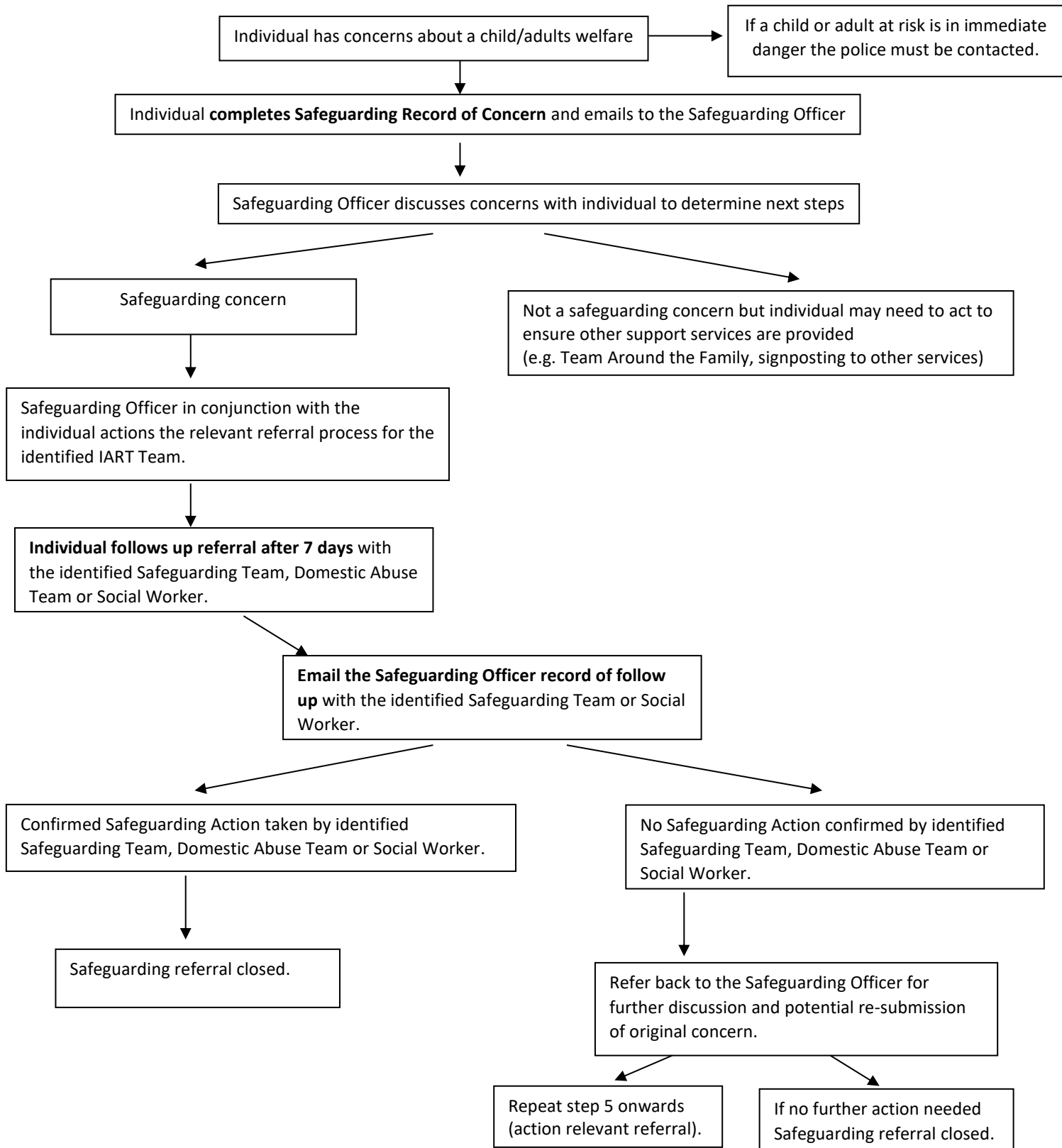
Discriminatory

- Does not receive the care they require
- Carer is over critical or makes insulting remarks
- Made to dress differently from how they wish.

Institutional;

- no personal clothing or possessions
- no care plan for them,
- often admitted to hospital,
- instances of professionals having treated them badly or unsatisfactorily or acting in a way that cause harm to the person

APPENDIX 2 – SAFEGUARDING REFERRAL PATHWAY



APPENDIX 3 – SAFEGUARDING RECORD OF CONCERN

Safeguarding Record of Concern/Incidents



TO BE COMPLETED BY PERSON RAISING THE CONCERN

Date concern is being raised:				
Details of person raising the concern				
Your name:				
Your position:				
Details of child or adult at risk				
Name:				
Telephone number:				
address and email:				
Date of birth (<i>if known</i>) or estimate of age range:	DoB:	0 - 17 <input type="checkbox"/>	18 - 64 <input type="checkbox"/>	65+ <input type="checkbox"/>
Any other details about child/ adult at risk that may be relevant:				
Name, address and contact details of care giver/ significant other/ next of kin:				
Details of the allegation(s)				
Suspected type(s) of abuse: (As per Appendix 1 of Policy)*				
<i>*(If you have identified alleged Domestic Abuse/Violence, please also complete a separate Domestic Abuse Risk Matrix)</i>				
Details of person alleged to be inflicting abuse				
Name:				
Relationship to child or adult at risk:				
Is the alleged perpetrator also a child or adult at risk? <input type="checkbox"/> YES <input type="checkbox"/> NO				
Details of specific incident(s)				
Date:				
Time of day:				
Details of the allegations/ your observations: (<i>Write what the person said or give details of what you saw</i>)				
Are you aware of any previous concerns or incidents reported by or about this individual? <input type="checkbox"/> YES <input type="checkbox"/> NO				

If 'yes' give details:		
Summary of information given to child or adult at risk: <i>(Include what you said to them about next steps)</i>		
Expectations/ wishes of child or adult at risk, if known:		
Actions taken so far:		
Has the child/parent or adult at risk been informed of the referral?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Permission given by child/parent or adult at risk to refer to relevant external agencies?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
TO BE COMPLETED BY SAFEGUARDING OFFICER		
Record of decision making		
Safeguarding log reference number:	DP/	
Confirm permission given by child/parent or adult at risk to refer to relevant external agencies?	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Decision to refer/ not to refer with reasons and details of any other non-referral actions taken, such as signposting or offer of further support: <i>(Include dates and times of actions taken)</i>		
	RAG Rating (Red, Amber, Green)	R A G
If reporting, add details of organisation and person receiving the referral		
Authority:		
Name:		
Position:		
Contact details:		
Details of any undertaking made by relevant:		

Useful Telephone Numbers

• Bolton Safeguarding Unit	01204 337 000
• Cheshire West Safeguarding Children; i-art team	0300 123 7047
• Cheshire West Safeguarding Adults	0300 123 7034
• Emergency duty officer out of hours West	01244 977277
• Cheshire East Safeguarding Children	0300 123 5012
• Cheshire East Safeguarding Adults	0300 123 5010
• Emergency duty officer out of hours East	0300 123 5022
• Lancashire Safeguarding Children	0300 123 6720
• Lancashire Safeguarding Adults	0300 123 6721
• Manchester Safeguarding Unit	0161 234 5001
• Warrington Safeguarding Adults	01925 444239
• Warrington Safeguarding Children	01925 443400
• Warrington Out of Hours	01925 444400
• Wirral Safeguarding Adults	0151 606 2006,
• Wirral Safeguarding Children	0151 606 2008
• Wirral Out of Hours	0151 677 6557

APPENDIX 4 – SAFEGUARDING ALLEGATION AGAINST A COMPANY STAFF MEMBER

Safeguarding Record of Allegation Against a Company Staff Member



TO BE COMPLETED BY PERSON RAISING THE CONCERN	
Date concern is being raised:	
Details of person raising the concern	
Your name:	
Your position:	
Nature of the allegation(s)	
Details of the Allegation(s):	
Details of person alleged to be inflicting abuse	
Company Staff Member(s) Names:	
TO BE COMPLETED BY CHIEF EXECUTIVE OFFICER OR TRUSTEE	
Your name:	
Your position:	
Local Authority Area:	
Date sent to Local Area Designated Officer (LADO) at identified Local Authority :	