

Safeguarding Policy and Framework

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Purpose

This policy statement outlines **East Essex Vocational Training LTD (EET Group)**' values, commitment and role in safeguarding and promoting the welfare of children, young people and vulnerable adults. It describes our contribution to local authority policies and national protocols on providing safe environments for children and vulnerable adults.

This policy applies to all staff who have contact directly or indirectly with children, young people and vulnerable adults through primary or sub-contract arrangements, whether permanent or temporary or working for another agency in one of our centres.

Failure to comply with this policy will result in an investigation and the company disciplinary procedures being instigated against staff if there has been a breach.

This policy and framework should be read alongside:

Confidentiality and Data Sharing Policy

Disclosure (Whistle blowing)

Managing Behaviour in a **East Essex Vocational Training (EET Group)** Centre - Policy and Guidelines

Criminal Records Disclosure Policy.

Policy Statement

EET Group is committed to safeguarding the welfare of all learners and other service users with whom we work. We will seek to employ staff who promote safeguarding by treating children, young people and vulnerable adults with care and respect and by protecting their dignity at all times. We recognise that all people regardless of age, disability, gender identity, race, religious beliefs, sexual orientation, marriage/civil partnership or pregnancy/maternity have an equal right to protection from all types of harm or abuse.

We will endeavour to safeguard children, young people and vulnerable adults by:

Ensuring that safeguarding underpins the way we organise, deliver and manage services

Ensuring that all staff in contact with children, young people and vulnerable adults have successfully passed through appropriate checks e.g. DBS (Disclosure and Barring Service)

Ensuring that all staff in contact with children, young people and vulnerable adults are aware of the professional and personal boundaries for their work e.g. recording information, not using personal mobile telephones or home email accounts to contact clients

Ensuring contracts are managed so as to secure a safe and supportive environment

Raising the awareness and knowledge of our staff about the importance of safeguarding

Ensuring staff know what action to take if concerns arise, including cases of potential abuse and neglect

Creating a climate that will enable clients and staff to raise any safeguarding issues they have concerning colleagues/staff

Explaining to our clients how they can make a complaint if they are unhappy with the service provided

Sharing information with the appropriate agencies if there is a risk of harm to a client or to others

Ensuring there are trained staff and/or managers (designated people) responsible for dealing with allegations and suspicions.

This policy will be kept under review to incorporate best practice.

Our Framework for Safeguarding

EET Group is committed to the principle of multi-agency working in order to safeguard children, young people and vulnerable adults. All senior managers operating at local authority level must work proactively with the Local Safeguarding Children Board (LSCB), Social Care, the Police, health and appropriate voluntary agencies to ensure we are fully aware of and involved in local reporting procedures, and attend training in safeguarding procedures delivered by the local authority.

The role of EET Group Safeguarding Officers

The company has appointed three senior Safeguarding Officers who are responsible for leading on safeguarding issues for the company:

The Directors (Children's Services and Guidance) is the Safeguarding Officer for Children's Services

The Operations Manager - Employment and Training Services is the Safeguarding Officer for employment and Training e.g. DWP contracts / ESF contracts

Together with the **EET Group** Safeguarding Management Group they help develop the overall safeguarding strategy and policy development and provide feedback direct to the **EET Group** Board. See *Appendix 1 for full details of responsibilities of Safeguarding Officers.*

The role of Safeguarding Management Group

The company has created a Safeguarding Management Group which is responsible for working with the Safeguarding Officers to develop policy and monitor compliance with the policy. (See *Appendix 1 for full details of responsibilities and Appendix 2 for the Terms of Reference for the group*).

The role of Operations Directors/Business Unit Managers

Senior Managers within all business areas working directly with children, young people and vulnerable adults will identify a nominated manager/designated person who will be the principal contact for internal and external staff on safeguarding issues. For example, in parts of the company delivering young people's contracts it is expected that there will be a nominated manager/designated person for each contract. A register of these managers will be maintained by **EET Group** Safeguarding Officers and be available to all staff via the company intranet.

Where a Local Safeguarding Children Board has decided that a Serious Case Review should be held to review actions relating to a specific case with which the company has been involved, it is the responsibility of the Operations Directors/Business Managers to prepare or oversee the writing of Prospect's Individual Management Review. *See Appendix 1 for responsibilities of Operations Directors/Business Unit Managers.*

The role of the nominated manager/designated person

The nominated manager/designated person will maintain an up to date set of local authority/regional policies, local procedures and referral forms for staff to use. It is their role to advise staff of any changes to these procedures and submit a report annually to the Quality and Business Improvement Team (QBIT).

See Appendix 1 for full details of the responsibilities of the nominated manager/designated person.

All staff members

All members of staff have a role to play in safeguarding and have a duty to report any concerns to their line manager and/or the nominated manager/designated person as outlined in the procedure which follows.

Staff working in outside locations: schools, Pupil Referral Units, Further Education colleges and other delivery outlets such as local authority run one stop shops and youth centres, must familiarise themselves with and follow the policies of the institutions to which they are attached and keep their **EET Group** line manager informed of any disclosures. Details of relevant contacts with designated safeguarding responsibilities should be included in any Partnership Agreement between **EET Group** and the institution.

Training, advice and company induction

All staff, as part of the company induction programme, will receive training on company policies and procedures and local safeguarding arrangements

New managers will be informed of their role and responsibilities within safeguarding as part of their induction by their line manager (appropriate senior manager e.g. Operations Director)

Senior managers and the nominated manager/designated person will need to decide whether it is appropriate to supplement induction with additional materials and should consult **HR**

Managers will receive training on the application of this policy and associated framework

All staff will be offered advice and training on safeguarding and their role within the process through attendance at in-house/local training events, on-going professional practice updates from their nominated manager/designated person and feedback from their manager from local authority safeguarding groups

All staff will attend a refresher on safeguarding arrangements every two years

All staff will receive regular updates on local arrangements through staff meetings, staff conferences/events and local training events

All nominated managers/designated persons will attend training on their role

All nominated managers/designated persons must have a local plan in place, setting out arrangements for staff training

All nominated managers/designated persons will be responsible for completing an annual self-assessment form, which will include information on the number of staff who have attended training across their area of responsibility and how training has been/will be rolled out. This will be submitted to the Safeguarding Management Group and **EET Group Board**

Senior managers and nominated managers/designated persons must promote local safeguarding training

All staff will be briefed on where to go for advice and support on safeguarding issues both at their site of work and within the organisation as a whole.

All staff who come into contact with children or vulnerable adults, or their records, are required to undertake safeguarding training at the appropriate level in line with the Safeguarding Vulnerable Groups Act 2006. All operational staff undertake Local Safeguarding Children Board (LSCB) sponsored training specific to the Local Authority in which they deliver the service.

EET Goup induction programme provides training on company and local safeguarding arrangements supplemented, where appropriate, by risk management training. Selected Operations Managers undertake Tier 3 training, where they manage staff delivering targeted work with clients. Refresher training sessions are undertaken at a minimum of every two years, with regular updates at staff meetings.

Recording and sharing information

All staff will make appropriate safeguarding referrals using the relevant paperwork for their area. The nominated manager will ensure that this is available and ensure there are clear guidelines on its use

All staff will share information in accordance with local protocols, the Children Act 2004, which imposes duties on public bodies to share information when this is necessary to safeguard the welfare of a child, and Working Together to Safeguard Children (March 2013). Staff can consult their nominated manager/designated person for advice and clarity about sharing information

All staff will maintain and store records in accordance with **EET Group**' Data Protection and Information Security policies and local procedures. Any sensitive data e.g. Safeguarding or Child Protection Case Conference minutes must be stored in a locked cabinet or drawer and managed in compliance with information security best practice. The line manager and nominated manager/designated person must have access to this information at all times.

Safeguarding children and young people

Definition - Children and Young People

The Children Act 1989 defines a child as **anyone who has not yet reached their 18th Birthday** (regardless of whether or not they are living independently). Although the term 'young person' is often used, this is simply a courtesy term as older children tend not to perceive themselves as children, but are still in the age range of the legal definition.

Background

The Children Act 2004 (section 11) places a duty on key people and bodies to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children. Safeguarding and promoting the welfare of children is defined in the guidance document *Working Together to Safeguard Children 2013* as:

Protecting children from maltreatment

Preventing impairment of children's health and development

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes.

Local Safeguarding Children Boards in each Local Authority are responsible for developing local policies and procedures, including those relating to the action to be taken where there are concerns about a child's safety and welfare. These procedures will be applied if a child protection referral is made to Children's Services. (*See Appendix 9 for further information on Local Safeguarding Children Boards*).

The Local Authority has a duty to make enquiries where it has reasonable cause to suspect that a child is suffering or is at risk of suffering significant harm which may be as a result of abuse and /or neglect. The Government guidance document *Working Together to Safeguard Children 2013* defines four categories of child abuse:

Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating etc.

Emotional/Psychological abuse - the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on their emotional health or development.

Sexual abuse - forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening

Neglect and Acts of Omission - the persistent failure to meet a child's basic psychological needs, likely to result in the serious impairment of their health or development.

Detailed definitions of each of these categories and information on the signs and symptoms of abuse (as provided by the NSPCC) can be found in Appendix 3. Staff should familiarise themselves with these, to ensure they are alert to the signs of possible child abuse.

Significant harm is the threshold that justifies compulsory intervention in family life in the best interests of the child. Decisions about significant harm are complex and will be informed by a careful assessment of the child's circumstances.

Recognising abuse is not always easy and it is not the responsibility of **<Insert company name>** staff to investigate and decide whether or not abuse has taken place, or if a child is at risk of significant harm. Staff should however always report any concerns they may have, following the procedure outlined in this document.

Always report any genuine concerns that you have. Do not let your fear of drawing a wrong conclusion deter you from doing so.

Where staff have a concern about a child which is **not** a child protection issue i.e. where there is no suspicion of abuse or neglect, but it is felt that the child may be in need of additional support, a referral should be made to the Local Authority.

Safeguarding vulnerable adults

Background

The legal basis for responding to concerns regarding the safety and welfare of vulnerable adults is different to that for children. *Working Together to Safeguard Children 2013* only applies to children and young people who have not yet reached age 18. Any incident or concerns relating to a young person or adult above the age of 18, even if they are still at school or college, are not covered by Local Safeguarding Children Boards or their procedures. Local councils are required to set up a multi-agency framework, led by Adult Social Care, but also including health bodies and the Police. They are required to develop policies for responding to allegations and carrying out investigations.

Although the legal basis is different, the principles for staff in identifying and responding to incidents of concern in relation to vulnerable adults are largely the same as those for children and young people under 18.

Definitions

Vulnerable adult

The department of Health defines a vulnerable adult as someone who is aged 18 or above and:
who is or may be in need of community care services by reason of mental or other disability, age or illness; **and**
who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Adults considered to be vulnerable in the above definition therefore may include those who have:

A learning / physical / sensory disability (including speech and language disability and communication disorders e.g. autistic spectrum difficulties)
Mental ill health or dementia
Frailty due to age
Acquired brain injury
A drug / alcohol problem
Certain types of physical illness.

As such, many staff in **EET Group** will come into contact with vulnerable adults during the course of their work. It should be noted however that a person is not classed as 'vulnerable' simply because they are elderly or have a disability and that vulnerability may not necessarily be a permanent state.

Abuse in the context of vulnerable adults

There is clearly significant overlap between what constitutes abuse of children and in the context of vulnerable adults, however as this is dealt with under separate legislation, separate guidance applies.

Current Department of Health guidance defines abuse as:

'a violation of an individual's human and civil rights by other person or persons.... Abuse may consist of single or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm, or exploitation of, the person subjected to it. Abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.

'Significant harm' should be taken to include:

'ill treatment including sexual abuse and forms of ill treatment which are not impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development.'

The main forms of abuse are:

Physical abuse - includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions

Sexual abuse - includes rape and sexual assault or sexual acts to which the vulnerable adult 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

Financial or material abuse - includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits

Neglect and acts of omission - includes 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

Discriminatory abuse – based on race, sex and disability, and other forms of harassment, slurs or similar treatment.

There are obvious similarities here with the types of abuse defined earlier in relation to children and young people, with the notable additions being the financial or material abuse and discriminatory abuse categories. It should be noted that forced marriage also falls within the definition of abuse.

Further information relating to the abuse of vulnerable adults, including forced marriage, can be found in Appendix 4.

Procedure – What to do if you have a safeguarding concern about a child or vulnerable adult

The procedure outlined below is to be followed if you think a child, young person or vulnerable adult is or may be at risk of abuse or is being/ has been abused by:

A member of staff or a volunteer

A member of their family

Any other person, including another child/ young person.

There are different ways that you may become concerned about actual or potential abuse, such as:

A child, young person or vulnerable adult might tell you about abuse

Someone else might tell you that they believe a child, young person or vulnerable adult has been or is being abused

Something about the way a member of staff (EET Group or other) relates to a child, young person or vulnerable adult makes you feel uncomfortable

You may observe an incident, involving a child, young person or vulnerable adult, which makes you feel uncomfortable

You may become aware of a physical indicator or changes in behaviour which suggest a child, young person or vulnerable adult may be being abused. (*See appendices 3 and 4 for signs and indicators of possible abuse.*)

Note that a concern may not necessarily relate to the client, but could relate to any person connected with that client, for example a sibling, child or partner of the client. Staff working on adult contracts for example, could potentially become aware of a safeguarding issue relating to a child and may therefore need to follow the procedure relating to children and make a child protection referral to children's services.

Where a child or young person under 18 indicates that abuse has taken place, (or another person tells a member of staff about the abuse), staff should never promise confidentiality. They should explain that they are required to refer the matter to an appropriate person but assure them that the prime consideration in any action taken will be their wellbeing.

Where the potential victim is a vulnerable adult (over 18), it is best practice that any action taken must be with the knowledge and consent of the individual concerned.

When talking to children, young people or vulnerable adults staff should adopt encouraging tone and body language to make sure the service user feels able to speak openly and honestly.

If for any reason you become concerned about a child or young person or vulnerable adult, the following action must be taken:

1. Contact the emergency services immediately if there is an emergency situation or you think anybody is at immediate risk of harm
2. It is important that you write down the details of your observations or the information you have received and sign and date the record. Try to include as much detail as possible, particularly about the child, young person or vulnerable adult such as; full name, date of birth (if known), address, language; remember to include parent/ carer details if you know them. If you have spoken with the child, young person include direct quotes of anything they have said to you (*See Appendix 5 for sample incident form*).
3. Report your concern immediately to your line manager and then inform your nominated manager/ designated person.
4. The nominated manager/designated person will discuss the concerns with you and your line manager and clarify the details. If it is agreed that a referral needs to be made, the following action should be taken:

In the case of a child or young person (under 18):

A referral should be made without delay to the local Children's Services, initially by telephone and then confirmed in writing using the local safeguarding paperwork and procedures for the authority. Procedures laid down by the Local Safeguarding Children Board (LSCB) will then apply. **The telephone referral should always be followed up with a referral in writing, even in cases where the child is already known to the authorities.**

See Appendix 9 for further information on Local Safeguarding Children Boards (LSCBs)

If you have a concern about a child which is not a child protection issue i.e., you think that the child may be in need of additional support; a referral should be made to the Local Authority.

In the case of a vulnerable adult (over 18):

A referral should be made without delay to the local Social Care department (adult protection team/adult duty officer), initially by telephone and then confirmed in writing using the local paperwork. The local multi-agency procedures will then apply

If a criminal offence is suspected – immediately refer to the Police. (Examples of criminal offences are: assault (whether physical or psychological), sexual assault and rape, theft, fraud or other

forms of financial exploitation, and certain forms of discrimination whether on grounds)

If the alleged abuse has taken place in a health care setting (premises managed and staffed by employees of the NHS) – Refer to the health service manager responsible

If in doubt - refer to Social Care.

5. If the concern is in relation to a colleague, the above procedure must be followed and in addition to the nominated manager, the appropriate company Safeguarding Officer must be informed. Where a child or young person under 18 is involved, the company Safeguarding Officer will, in turn, contact the relevant Local Authority Designated Officer (LADO) to report the concern and seek advice on how best to proceed. **Please note: It is NOT for the recipient of the allegation to determine its validity and failure to report is a potential disciplinary matter.** The Procedure for Safeguarding Investigation and Formal Hearings is to be followed in these circumstances (*see Appendix 6*).

See Appendix 9 for information on the Local Authority Designated Officer (LADO)

6. If the concern is in relation to a member of staff from outside **<Insert company name>**, the above procedures will still apply, but the line manager from their organisation will be involved at the earliest opportunity and **<Insert company name>**' Safeguarding Officer will work with them to investigate the situation.

Staff recruitment

The Role of Human Resources Unit

The company, through its specialist Human Resources (HR) Unit and in-house recruitment team (Odyssey) will ensure that **EET Group** practises safer recruitment practices and that the company follows all statutory requirements for the screening of employees, including those set by the Disclosure and barring service (DBS).

All staff who have regular and ongoing unsupervised access to children, young people or vulnerable adults or, access to their information or, provide a management role in this area of work will have Enhanced Disclosure and are required to be registered with the DBS (please refer to **EET Groups'** Criminal Records Disclosure Policy).

The HR Unit will ensure that all staff working with young people comply with company policy on criminal records disclosure. HR will issue regular reports on employees who have not completed Disclosures and follow this up with the appropriate manager.

The HR Unit will maintain an updated list of job roles which require Enhanced Disclosure. The entry to this list is managed by **EET Group** Safeguarding Management Group.

Enhanced Disclosure means that a search has been completed to enable the Police to indicate if the person is currently under investigation, has been investigated and nothing proved, or if there is a concern about the suitability of the person for the post of which the employer should be made aware.

Additionally the HR Unit will ensure the following checks are made for all posts where staff will be dealing with children, young people and vulnerable adults:

Identity (passport, birth or marriage certificate)

Proof of address

Academic qualifications

Previous employer

Two written professional references (See **EET Groups'** Recruitment and Selection Procedure).

DBS forms must be returned by staff within a period of four weeks from receiving notification that their check is due for renewal, in line with **EET Groups'** DBS policy. If this deadline is not met, line managers will be informed immediately. Persistent failure to return the form could result in disciplinary action.

Dealing with issues arising from DBS checks

If an offence is revealed which has nothing to do with children, young people or vulnerable adults or is not relevant to their role, no further action will be taken

If an offence is revealed, which may be relevant or it is not clear, the matter will be raised with the **HR**, with the appropriate senior manager, will determine whether it is relevant by reference to *Disclosure information – A guide for Human Resources and Line managers*.

Using Recruitment Agencies:

When appointing staff from a recruitment agency to permanent posts, such staff will be required to undertake the same pre-employment checks as directly recruited staff.

Where staff are appointed to a temporary opportunity, the agency must confirm that the following checks have been made, before an individual is placed:

Proof of identity

Proof of address

Academic/professional qualifications

Professional references (2) – may not be in place due to lead-in time

Previous employment history - all gaps in employment history must be thoroughly explored/checked through

Current Disclosure.

The manager's role in staff recruitment:

Managers play a crucial role in interviewing potential employees. It is important that the following areas are thoroughly explored/checked through:

Previous employment history and in particular any gaps in employment history

Whether they have worked in any part of **EET Group** before and the motivation for change

Motivation for leaving previous employment

Two references, professional and character references, for all new recruits, approved by the manager who is recruiting (a special reference proforma will be used for staff who have unsupervised access to young people)

Reasons for wanting to work with children, young people, or vulnerable adults.

Role of the ICT Unit

The specialist ICT Unit has a key role in our safeguarding framework. The corporate Email and Internet Policy available on the company intranet (Policies and Procedures – Email and Computer Policies section) sets out the mandatory protocols for all **EET Group** staff to follow and how these are monitored across the company.

All staff must sign the 'Use of Internet Agreement' when joining the company; this is provided by line managers and incorporated in the Induction Pack and makes specific reference to not accessing pornography

The ICT Unit will undertake regular and random audits of both the network and equipment including laptops and report any incidents to the Senior Management Board and the Safeguarding Board

Any inappropriate use of the internet must be followed up by the line manager and could result in a referral to the statutory authorities and/or instigation of '<Insert company name>' disciplinary procedures

The Safeguarding Management Group will monitor these procedures by checking that the appropriate actions have been taken.

E-Safety and Social Media

Use of technology, including the internet, social media and mobile phone, offers effective opportunities for **EET Group** staff to engage with customers and stakeholders. Safeguarding considerations must be integrated into any work or contact with young people or vulnerable adults to minimise potential risks that the internet can pose. This policy should be read in conjunction with **EET Group** Email and Internet policy, Client Computer Use policy and Social Media policy which offer e-safety instructions and guidance for staff working with young people or vulnerable adults. Potential risks and potential indicators of online grooming and sexual exploitation are listed in the Social Media policy. These policies are available on the intranet at **Policies, Procedures and Guidelines>Information Security**.

Minimising risk

Young people and vulnerable adults should never be asked to divulge any personal details online including home and email address, school, mobile number

Social media accounts or profiles should be set up using a **EET Group** email address

Don't use your company email address on any personal social web accounts or profiles

Managers should check that any profiles are deleted as part of the leaver process

When a social web profile owner receives a friend request from a young person, they should

- always verify the young person's identity and add the details to their client record

EET Group’ social web profile owners should not accept friend requests from (with special needs), unless they are a known local professional working with young people. All other adult friend requests should be redirected politely to other more appropriate services. When a client on a staff member’s friends list is no longer eligible to receive the service provided they should be de-friended.

What to do if you have safeguarding concerns

Where staff have any potential safeguarding concerns, for example where seriously inappropriate content is discovered or where there is a suspicion of online grooming the matter must be referred to the immediate line manager or local Operations/ business unit manager and to the nominated officer for safeguarding. They will consider what action needs to be taken and record any concerns/referrals on the safeguarding site in accordance with the Safeguarding Policy. In addition, suspicious behaviour towards children and young people online should be reported to the Child Exploitation and Online Protection Centre (CEOP) at www.ceop.police.uk.

If you think a child, young person or vulnerable adult may be in immediate danger, always dial 999 for Police assistance.

Ensuring safe environments

Arrangements to provide safe environments for service users, customers and learners include:

Gaining feedback from young people and adults on services delivered

Screening new staff

Training staff in local procedures

Supervision

Audits and reviews of service policy and provision by the Safeguarding Management Group and local nominated managers/designated persons

Assessing, where appropriate, potential referral agencies working with young people and vulnerable adults in the area

Contributing to Local Safeguarding Children Boards (LSCBs).

Safe environments measures for staff will include:

Protection both from physical assault and from unfounded allegations by following the appropriate policies and procedures on the company intranet e.g. Comments, Compliments and Complaints Procedure, Disclosure (Whistleblowing) Policy, Managing Behaviour in **EET Group**’ Centres Policy and Guidelines

Reporting and monitoring incidents and taking preventative measures

Compliance with systems for logging whereabouts, including the transporting completing diaries and risk assessment forms

Expressing their concerns through procedures outlined in the company Disclosure (Whistle Blowing) Policy, on the company intranet.

Working with clients with known convictions

In a situation where a client has disclosed a conviction/s for sexual assault or abuse of children, young people or vulnerable adults, or where another agency e.g. Social Care or the Police has alerted us to convictions or serious concerns/allegations against a client, additional care will need to be taken when dealing with the client (It should be noted that young people as well as adults may have convictions for these offences.).

In these circumstances, the Local Nominated Safeguarding officer must undertake a risk assessment, working within local MAPPA¹ protocols, to assess whether seeing the client at a **EET Group** centre or other delivery premises, poses a risk to other clients using that centre. They must also consider whether there is sufficient staff resource to monitor the client's visit, including monitoring the client's access to ICT resources at all times.

Where the client poses a low risk and can be effectively monitored, the client may be seen at the **EET Group** centre/ other delivery premises. If however the client is deemed to pose a high risk, it may be necessary to arrange for them to be seen at an alternative venue. The local manager should seek advice from the appropriate local partner(s) as to possible locations. It may also be appropriate to arrange for the client to attend an intervention accompanied by a support worker e.g. social worker. These precautions will not only protect young people and vulnerable adults attending our centres, but will also protect the client and **<Insert company name>** staff.

If there is any doubt, the Nominated Manager should seek advice from the relevant Safeguarding Officer, HR..

In all cases, the client record system should be carefully updated with all visits fully documented. In a situation where a client has disclosed a conviction/s for sexual assault or abuse of children, young people or vulnerable adults, or where another agency e.g. Social Care or the Police has alerted us to convictions or serious concerns/allegations against a client, additional care will need

¹ The Multi-Agency Public Protection Arrangements for the responsible authorities to manage registered sex offenders, violent and other types of sexual offenders, and offenders who pose a serious risk of harm to the public. 'Responsible authorities' of the MAPPA include the National Probation Service, HM Prison Service and Police Forces.

to be taken when dealing with the client. (It should be noted that young people may have convictions for these offences).

In these circumstances, the Local Nominated Safeguarding officer must undertake a risk assessment to assess whether seeing the client at a **EET Group** centre or other delivery premises, poses a risk to other clients using the centre. They must also consider whether there is sufficient staff resource to monitor the client's visit and their access to ICT resources at all times.

Where the client poses a low risk and can be effectively monitored, the client may be seen at other delivery premises. If however, the client is deemed to pose a high risk, it may be necessary to arrange for them to be seen at an alternative venue. The local manager should seek advice from the LA agencies as to possible locations. It may also be appropriate to arrange for the client to attend an intervention accompanied by a support worker e.g. social worker. These precautions will not only protect young people and vulnerable adults attending our centres, but will also protect the client and **EET Group** staff.

If there is any doubt, the Nominated Manager should seek advice from the relevant Safeguarding Officer, the Directors

In all cases, the client record system should be carefully updated with all visits fully documented.

Dealing with allegations made against EET Group staff (former members of staff)

These allegations could include:

Suspicion or allegations about an individual's work in connection with children, young people and vulnerable adults (past or present employee)

Suspicion or allegations of abuse by a person who works with children, young people or vulnerable adults e.g. where young people are introduced by an adult into criminal activity, alcohol, drugs, sexual abuse, violence

Discovery of a staff member's previous involvement in abuse

Allegations made against staff in their personal lives. Situations could occur where the company has been alerted by the Police or a social care team that a member of staff is under investigation. Investigations could be criminal or of a social care nature where the individual's own children could be at risk of harm. **EET Group** managers may be informed of concerns about a member of staff by the LADO, a specially convened strategy meeting or the Police

Inappropriate use of company ICT equipment including but not limited to mobile phones, laptops, computers, ipads, tablets.

All concerns must be recorded and reported as outlined below. They will be fully investigated using the guidelines set out in the company's 'Procedure for Safeguarding Investigation and Formal Hearings' (see Appendix 6) and Disciplinary Policy found on the company Intranet.

*It is **NOT** for the recipient of the allegation to determine its validity and failure to report could be a potential disciplinary matter.*

If the individual against whom an allegation is made is a current employee, **EET Group**'s Safeguarding Officer will (having taken advice from the Local Authority Designated Officer (LADO) if the case involves a child or young person under 18) advise staff and managers if the concerns constitute sufficient grounds for disciplinary procedures to be instigated, and decide whether it is appropriate to suspend the member of staff pending investigation.

If the allegation is raised internally by another member of staff, the company Disclosure Policy (Whistleblowing) outlines the protection given to that staff member and the procedures they should follow.

If an allegation is made about a member of staff, or former member of staff, the following procedure should be followed:

Their line manager must:

Be informed immediately of the allegation

Read and follow the guidelines identified in the Procedure for Safeguarding Investigation and Formal Hearings (See Appendix 6) and the Disciplinary Policy

Immediately notify **EET Group**' Safeguarding Officer and local Nominated M. person about the concern raised

Record details of the allegation using the 'Form for reporting and recording concerns received against a member or former member of staff, including staff from other agencies using our premises' (*Appendix 8*) and provide details of their local authority investigation procedures and relevant contact details, employment history, previous notes from supervision meetings, Annual Reviews/KITs/Supervision.

2. Managers **must not**:

Begin any investigation with any party until authorised to do so by **EET Group** Safeguarding Officer

Disclose the allegation to the employee or former employee, nor to members of staff other than their line manager, HR Manager and **EET Group** Safeguarding Officer.

EET Group Safeguarding Officer will be advised by the LADO if a multi-agency response is required

3. In conjunction with the LADO **EET Group**' Safeguarding Officer will make arrangements for a full and sensitive investigation in line with the Procedures for Safeguarding Investigation and Formal Hearings and the Disciplinary Policy

4. Safeguarding Officer will take advice from the LADO and/or strategy group on whether suspension is appropriate

5. Where the allegation relates to a social worker, Safeguarding Officer will refer the matter to the Health And Care Professions Council (HCPC), the Government body for social workers

6. Confidentiality will be of the utmost importance in the interests of the child, young person or vulnerable adult, the staff member(s) concerned and the company

7. Safeguarding Officer will notify the Directors and agree on the management of any media interest

8. If/when concerns are confirmed, the Safeguarding Officer will ensure all relevant information is passed to the authorities at the earliest opportunity and consider making a referral to the DBS

9. ' Safeguarding Officer and company solicitor will consider possible claims for compensation and alert insurers if appropriate

10. The incident will be reviewed by the Safeguarding Management Group to check that adequate safeguards are in place and review the existing policy in line with any findings

11. If, following an investigation, the allegations are unfounded the manager and local Nominated Officer will work with the member of staff to consider the level of support they need to help them back into work

12. External supervision will be made available to line managers if they become involved in the investigation.

Dealing with allegations made against staff not employed by EET Group but working on EET Group premises

This will involve a joint investigation with the individual's line manager from their employing organisation and **EET Group**' Safeguarding Officer.

1. The centre manager must:

Be informed immediately of the allegation

Read and follow the guidelines identified in the Procedure for Safeguarding Investigation and Formal Hearings (*see appendix 6*) and the Disciplinary Policy

Immediately notify **EET Group** Safeguarding Officer, the local nominated manager/designated person and the individual's line manager about the concern raised

Record details of the allegation using the 'Form for reporting and recording concerns received against a member or ex-member of staff including staff from other agencies using our premises' (*Appendix 8*) and provide details of their local authority investigation procedures and relevant contact details, employment history at the **EET Group** centre.

2. Managers **must not**:

Begin any investigation with any party until authorised to do so by **EET Group**' Safeguarding Officer in agreement with the individual's line manager

Disclose the allegation to the employee or former employee, nor to members of staff other than the individual's line manager and **EET Group**' Safeguarding Officer

3. **EET Group**' Safeguarding Officer and the individual's line manager will discuss concerns with the LADO (in the case of an allegation relating to a child or young person under 18), Social Care and/or the Police depending on the nature and seriousness of the allegation

4. In conjunction with the LADO and strategy group, the Safeguarding Officer will advise whether or not the individual should be suspended from working in a **EET Group** centre

5. Safeguarding Officer will make arrangements with the individual's line manager for a full and sensitive investigation

6. Confidentiality will be of the utmost importance in the interests of the child, young person, vulnerable adult, the staff member(s) concerned and the company

7. Safeguarding Officer will notify the Managing Director and agree on the management of any media interest

8. If/ when concerns are confirmed Safeguarding Officer with the individual's line manager will undertake appropriate action to pass the relevant information to the authorities at the earliest opportunity and consider whether a referral should be made to the Independent Safeguarding Authority. If it is decided that a referral should be made, this would usually be made by the individual's employer

9. Safeguarding Officer and company solicitor will consider possible cla and alert insurers if appropriate
10. The incident will be reviewed by the Safeguarding Management Group to check that adequate safeguards are in place and review the existing policy in line with any findings
11. If, following an investigation, the allegations are unfounded, the centre manager, the local nominated officer and the individual's line manager will work with the member of staff to consider the level of support they need to help them back into work.

Support for those involved in an allegation (complainant, staff member or any other person affected)

An integral part of our arrangements for managing any concern or allegation is the protection and support of those involved, including the member of staff, the complainant and anyone else affected. Confidentiality considerations are of the utmost importance in the interests of the complainant, the subject and the organisation, however confidentiality is never promised to the complainant, as detailed in the procedure for managing a safeguarding concern section of this policy (pp. 13-15). Staff will explain that they are required to refer the matter to an appropriate person but will assure the complainant that the prime consideration in any action taken will be their wellbeing. In the case of an allegation relating to a vulnerable adult, referral to adult social services is made only with consent (unless the complainant is deemed incapable of consent). A strategy meeting will plan and coordinate the response. In line with our Disciplinary Procedures any employee subject to investigation will be formally advised and no disciplinary action will be taken until the full investigation has been conducted, although stages may be omitted in consultation with HR where the complaint is sufficiently serious. Employees have the right to be accompanied by an accredited union representative or colleague from within the company at any formal meetings. Employees have the right to appeal against any disciplinary decision. A full-time union official will be consulted in cases of disciplinary decision involving a union steward and notes will be taken of all meetings. Post-case support is also important and if, following an investigation, allegations are unfounded the manager and local nominated officer will work with the member of staff to consider the level of support they need to help them back into work. Support is also provided to anyone else involved in or affected by the case, for example external supervision is available to line managers if they become involved in an investigation. If the allegation is raised internally by another member of staff, our Confidential Disclosure (Whistleblowing) Policy outlines the protection given to that staff member and the procedures that will be followed.

Monitoring and auditing arrangements

1. An annual self-assessment will be completed in each location to monitor training and the frequency of incidents. This will be issued by QBIT, completed and returned for collating and then shared with the Safeguarding Management Group and the appropriate Senior Management Team. Policy and practice will be reviewed and adjusted in light of any recommendations agreed
2. All incident reports will be reviewed by the Safeguarding Management Group to check on practice and ensure that the company procedures are being followed and are effective
3. The ICT Unit will regularly audit internet usage and provide a report to the Safeguarding Management Group and the appropriate Senior Manager
4. The ICT Unit will also undertake regular and random audits of both the network and equipment including lap tops, and report findings to the Safeguarding Management Group and the appropriate Senior Manager.

Appendix 1 – Roles and Responsibilities

Role:	Responsibilities:
<p>' Safeguarding Management Group</p>	<p>Advise managers and provide a Board level perspective on safeguarding issues</p> <p>Policy development and implementation</p> <p>Scrutinise and audit e.g. monitor the level of incidents through the annual self-assessment report, monitor training across the company</p> <p>Work with HR to manage the list of job roles requiring Enhanced disclosure</p> <p>Ensure action is undertaken to address concerns or gaps emerging from Section 11 audit activity</p> <p>Review procedures</p>
<p>' Safeguarding Officer</p>	<p>Develop and monitor policy arrangements and safeguarding strategy</p> <p>Provide feedback to the Safeguarding Management Group</p> <p>Report to the Board</p> <p>Maintain the register of Nominated Managers on the intranet</p> <p>Provide advice to Nominated Managers on Safeguarding issues where necessary (including advice on risk assessments in relation to clients who disclose convictions)</p> <p>Work with HR Manager if issues arise over DBS checks</p> <p>Decide if it is necessary to involve Social Care and/or the Police if an allegation is made against a member of staff</p> <p>Advise the member of staff directly, or through the Operations Manager, about the nature of the allegation and inform them how the enquiry will be conducted and the possible outcomes of disciplinary action</p> <p>Notify the Directors and refer media interest to Media Response Team</p> <p>Undertake appropriate action to pass on relevant information to the authorities</p> <p>Liaise with the company Solicitor to consider possible claims for compensation and alert insurers if required</p> <p>Investigate any allegations made against staff not employed by EET Group but working on EET Group premises with their line manager and decide next steps (after taking advice from the LADO in cases involving a child or young person under 18)</p> <p>Review incidents with the Safeguarding Management Group to check that the relevant safeguards are in place and recommend changes in line with any findings</p>

	Decide if a referral should be made to DBS
Operation Directors/Business Unit Managers	<p>Allocate a Nominated Manager to be the principal contact for internal and external staff</p> <p>Ensure Training Plan compliance</p> <p>Ensure compliance with policies and guidelines</p> <p>Engage in local investigations</p>
Nominated Manager/designated person	<p>Be pro-active with Local Safeguarding Children Boards and ensure staff have full details of their reporting procedures and relevant contact details in case of an allegation</p> <p>Be proactive with Social Care, Police, health and voluntary organisations</p> <p>Advise new managers about their role in safeguarding and the importance of ensuring staff return DBS forms within four weeks of receiving notification that their check is due for renewal, in line with the company DBS policy</p> <p>During recruitment and selection processes ensure any gaps in employment history are fully checked</p> <p>Ensure that references for all new staff are verified</p> <p>Ensure all staff, including temporary and fixed contract staff, receive a thorough induction on safeguarding arrangements and procedures, both local and across <Insert company name></p> <p>Ensure all managers and staff are trained on allegations and how to handle disclosures from a young person/parent/representative from a stakeholder organisation</p> <p>Ensure all staff attend safeguarding training at least every two years</p> <p>Ensure staff complete 'Use of Internet' agreement and are clear about NOT sharing their passwords with any other member of staff</p> <p>Ensure staff are aware of local protocols for safeguarding</p> <p>Be prepared to follow-up any issues raised through DBS checks, inappropriate use of the internet etc.</p> <p>Ensure Leaver Forms are completed promptly and ensure names are deleted from the ICT list immediately</p> <p>Notify Safeguarding Officer and local Nominated Manager if an allegation is made against a member of staff</p> <p>Undertake risk assessments in relation to clients who may pose any risk to themselves or others</p>

	<p>Ensure all incidents are correctly recorded in line Investigation and Formal Hearing and Disciplinary Policy and passed onto the nominated manager</p> <p>Ensure local policies, procedures and necessary paperwork are up to date and available on the intranet</p> <p>Regularly report any changes in procedures to staff</p> <p>Attend the Safeguarding Management Group and provide feedback to staff</p> <p>Be the principal contact locally for internal and external staff and support staff with any issues regarding safeguarding</p> <p>Work with the line manager to consider the needs and support for any member of staff who is involved in an allegation against them</p> <p>Monitor and share Incident Reports with the Safeguarding Management Group</p>
<p>Quality and Business Improvement Team (QBIT)</p>	<p>The Directors will act as the Caldicott Guardian for EET Group in cases where we are jointly working with senior health professionals in the NHS and Social Care, on issues about information sharing particularly patient identifiable data</p> <p>Maintain policy in line with legislation and good practice</p> <p>Manage reporting to the Safeguarding Management Group and the Board</p> <p>Make arrangements for internal audit and review company practice</p> <p>Ensure adequate training and resources are available for nominated managers and staff across the company</p> <p>Monitor feedback from clients</p> <p>Oversee relationship management with NSPCC consultants and specialists working with vulnerable adults</p>
<p>Human Resources Unit</p>	<p>Review and maintain compliance with DBS requirements e.g. provide a policy statement on rehabilitation</p> <p>Maintain a current list of which job roles require Enhanced disclosures, and DBS registration</p> <p>Ensure that all relevant staff have the appropriate level of disclosure in place</p> <p>Issue reports on staff who have not completed disclosures</p> <p>Make the necessary checks for staff working directly with young people i.e. DBS disclosure, two references</p> <p>Support managers if issues arise through DBS checks and provide advice on whether an Enhanced check is required for a particular role</p>

	<p>Check that DBS forms are completed and returned within the specified period. Advise line managers immediately if this deadline is not met</p> <p>Comply with DBS requirements</p> <p>Ensure recruitment agencies providing individuals to work with young people or vulnerable adults are aware of and meet the employment checks required</p> <p>Support Operations Directors/Business Managers in making referrals to the DBS</p>
Employment Agencies	<p>Make the necessary checks for staff working directly with young people i.e., DBS, two references</p> <p>Comply with DBS requirements</p>
ICT Unit	<p>Regularly audit internet usage and provide reports to the Senior Management Board and the Safeguarding Management Group</p> <p>Undertake regular and random audits of both the network and equipment including laptops and provide reports to the Senior Management Board and the Safeguarding Management Group</p> <p>Remove leavers from the company system immediately, once advised they have left the company</p> <p>Liaise with managers to ensure that staff only have access to IT programmes relevant to their role</p>
Staff	<p>Return completed DBS forms within four weeks of notification that their check is due for renewal in line with company policy</p> <p>Read company policies and guidelines in relation to safeguarding and be able to handle sensitively allegations and disclosure</p> <p>Be aware of personal boundaries and avoid any form of communication with a child/young person/vulnerable young adult which could be interpreted as sexually suggestive i.e. verbal comments, letters, notes, email, telephone calls and texts</p> <p>Never promise confidentiality</p> <p>Understand that safeguarding is not just about sexual and physical abuse but also about situations where children, young people and vulnerable adults may be exposed to exploitation through criminal activity, alcohol, drugs, and violence</p> <p>Be prepared to exercise judgement and pass on information</p> <p>Complete the company induction programme and attend local and company safeguarding training every two years minimum</p> <p>Keep up to date with changes</p>

	<p>Be aware of who the Nominated Manager is for you</p> <p>who the Safeguarding Officers are in other work locations e.g. schools, colleges, youth centres; follow reporting procedures</p> <p>Ensure all incidents are recorded and notes are up to date</p> <p>Ensure access by Nominated Manager to any information locked away</p>
Facilities Manager	<p>Maintain a safe environment for staff and customers</p> <p>Monitor compliance with systems</p> <p>Report to Safeguarding Management Group any incidents as they occur</p>

Appendix 2 –Safeguarding Management Group – Term

Introduction

Safeguarding children, young people and vulnerable adults is everyone’s responsibility. Section 11 of the Children Act 2004 places a duty on key people and bodies to make arrangements to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children and young people. **EET Group** is equally concerned with safeguarding vulnerable adults.

Our services have an important and vital role in representing the needs of children, young people and vulnerable adults, safeguarding and promoting their welfare. It is our responsibility to ensure that our customers are always in safe, healthy and supportive environments when using our services.

The Group recognise that no single agency can deal with this issue alone and interagency co-operation and teamwork serve the best interests of children, young people and vulnerable adults. Our policies and procedures include arrangements for inter-agency relationships with the statutory services, non-statutory partners and other local authority services.

The Safeguarding Management Group is responsible for the policy, procedures, implementation and monitoring of safeguarding arrangements across **EET Group**

The safety and welfare of children, young people and vulnerable adults is paramount; it must override all other considerations.

The Group:

Is responsible for ensuring that EET Group complies with current legislation and good practice guidance in relation to safeguarding of children, young people and vulnerable adults

Is responsible for ensuring that policies and procedures for the protection of children, young people and vulnerable adults are applied, and reviewed regularly

Oversees risk assessments to ensure children, young people and adults are not exposed to undue risk from unsafe or unsuitable situations

Is responsible for monitoring and reviewing safeguarding arrangements, across all directorates and corporate services, ensuring business or operational plans and internal performance monitoring fully cover safeguarding and promoting the welfare of children, young people and vulnerable adults in line with statutory guidance

Will ensure consistency and implement measures to improve practice

Will ensure that HR procedures and processes fully comply with the Safeguarding Vulnerable Groups Act 2006, and the Disclosure and Barring Service (DBS) vetting and barring scheme

Will be responsible for ensuring that training is provided at all levels within th
provide guidance to service managers about appropriate training and who should receive it
Will assure consistency of approach and the quality of training across **EET Group**
Will encourage a culture where it is seen as constructive to raise concerns and where managers
respond positively to staff who raise them
Will oversee all allegations or complaints about staff
Will supervise the investigation of allegations or complaints involving children or vulnerable people,
including those which fall outside the role of Social Care or the Police
Will decide cases where there are doubts about the appointment of staff because of criminal
convictions or allegations
Will take responsibility for ensuring that any recommendations from case conferences or reviews
held under child or adult protection procedures are implemented
Will audit any serious incidents or cases to ensure that lessons are learned and put into practice.

Membership

Directors
Operations Manager (Children's Services and Guidance)
Groups HR

Meetings

Meetings are held quarterly, but will be convened as required.

Reporting

The Group will make an annual report to the Board.

Right of Access

The Group has absolute right of access to all operations including contracted or franchised services.

Appendix 3 – Abuse of children and young people (NSPCC Child Protection Factsheet 2010)

Definitions of child abuse

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child or young person by inflicting harm, or by failing to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger.

They may be abused by an adult or adults or another child or children. The g
'Working together to safeguard children' defines four types of child abuse as follows:

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or vulnerable adult or failing to protect them from that harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional/Psychological Abuse

Emotional abuse is the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on their emotional health or development. It may involve conveying to children 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 opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities 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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

Neglect is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse or vulnerable adult may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect them from physical and emotional harm or danger
- ensure adequate supervision including the use of inadequate care-givers
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, their basic emotional needs.

Bullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group).

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies.

Signs and indicators of child abuse

Recognising child abuse is not easy, and it is not your responsibility to decide whether or not child abuse has taken place or if a child is at significant risk of harm from someone. You do however, have both a responsibility and duty under the **<Insert company name>** procedures to act in order that the appropriate agencies can investigate and take any necessary action to protect a child. The following information should help you to be more alert to the signs of possible abuse:

Physical Abuse

Most children will collect cuts and bruises as part of the rough and tumble of daily life, and injuries should always be interpreted in light of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins and are often on the front of the body. Some children, however, will bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern, although this can be more

complicated with burns, as these are often delayed in presentation due to some time later.

The physical signs of abuse may include:

unexplained bruising, marks or injuries on any part of the body
multiple bruises - in clusters, often on the upper arm, outside of the thigh
cigarette burns
human bite marks
broken bones
scalds, with upward splash marks
multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

fear of parents being approached for an explanation
aggressive behaviour or severe temper outbursts
flinching when approached or touched
reluctance to get changed, for example in hot weather
depression
withdrawn behaviour
running away from home.

Emotional Abuse

Emotional abuse can be difficult to measure, as there are often no outward physical signs. There may be a developmental delay due to a failure to thrive and grow, although this will usually only be evident if the child puts on weight in other circumstances, for example when hospitalised or away from their parents' care. Even so, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

being unable to play
fear of making mistakes
sudden speech disorders
self harm
fear of parent being approached regarding their behaviour
developmental delay in terms of emotional progress.

Sexual Abuse

Adults who use children to meet their own sexual needs abuse both girls including infants and toddlers. Usually in cases of sexual abuse, it is the child's behaviour which may cause you to become concerned, although physical signs can also be present. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously. It is also important to remember that it not just adult men who sexually abuse children – there are increasing numbers of allegations of sexual abuse of children against women and sexual abuse can also be perpetrated by other children or young people.

The physical signs of sexual abuse may include:

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- Pregnancy.

Changes in behaviour which can also indicate sexual abuse include:

- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- sexual knowledge which is beyond their age, or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults.

Neglect

Neglect can be a difficult form of abuse to recognise, yet it can have some of the most lasting and damaging effects on children.

The physical signs of neglect may include:

constant hunger, sometimes stealing food from other children
constantly dirty or 'smelly'
loss of weight, or being constantly underweight
Inappropriate dress for the conditions.

Changes in behaviour which can also indicate neglect may include:

complaining of being tired all the time
not requesting medical assistance and/or failing to attend appointments
having few friends
Mentioning their being left alone or unsupervised.

Bullying

Bullying is not always easy to recognise as it can take a number of forms. For example, a child may encounter bullying attacks that are:

Physical - pushing, kicking, hitting, pinching and other forms of violence or threats

Verbal - name-calling, sarcasm, spreading rumours, persistent teasing

Emotional - excluding (sending to Coventry), tormenting, ridicule, humiliation.

Persistent bullying can result in:

Depression

Low self-esteem

Shyness

Poor academic achievement

Isolation

Threatened or attempted suicide.

Some signs that a child may be being bullied can be:

Coming home with cuts and bruises

Torn clothes

Asking for stolen possessions to be replaced

Losing dinner money

Falling out with previously good friends

Being moody and bad tempered

Wanting to avoid leaving their home

Aggression with younger brothers and sisters

Doing less well at school
Sleep problems
Anxiety
Becoming quiet and withdrawn.

These definitions and indicators are not meant to be definitive, but only serve as a guide to assist you. It is important too, to remember that many children may exhibit some of these indicators at some time, and that the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as a death or the birth of a new baby in the family or relationship problems between parents/carers. In assessing whether indicators are related to abuse or not, the authorities will always want to understand them in relation to the child's development and context.

Appendix 4 – Abuse of vulnerable adults (Department guidance)

Forms of abuse

The main forms of abuse in relation to vulnerable adults are:

physical abuse, including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions

sexual abuse, including rape and sexual assault or sexual acts to which the vulnerable adult 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

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

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

discriminatory abuse, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

Any or all of these types of abuse may be perpetrated as the result of deliberate intent, negligence or ignorance. Incidents of abuse may be multiple, either to one person in a continuing relationship or service context or to more than one person at a time. This makes it important to look beyond the single incident or breach in standards to underlying dynamics and patterns of harm.

Some instances of abuse will constitute a criminal offence. In this respect vulnerable adults are entitled to the protection of the law in the same way as any other member of the public. In addition, statutory offences have been created which specifically protect those who may be incapacitated in various ways. Examples of actions which may constitute criminal offences are assault, whether physical or psychological, sexual assault and rape, theft, fraud or other forms of financial exploitation, and certain forms of discrimination, whether on racial or gender grounds. Alleged criminal offences differ from all other non-criminal forms of abuse in that the responsibility for initiating action invariably rests with the state in the form of the Police and the Crown Prosecution Service (private prosecutions are theoretically possible but wholly exceptional in practice). Accordingly, when complaints about alleged abuse suggest that a criminal offence may have been committed it is imperative that reference should be

made to the Police as a matter of urgency. Criminal investigation by the Police on all other lines of enquiry.

Neglect and poor professional practice also need to be taken into account. This may take the form of isolated incidents of poor or unsatisfactory professional practice, at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. Repeated instances of poor care may be an indication of more serious problems and this is sometimes referred to as institutional abuse.

Who may perpetrate abuse?

Vulnerable adult(s) may be abused by a wide range of people including relatives and family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates, people who deliberately exploit vulnerable people and strangers.

There is often particular concern when abuse is perpetrated by someone in a position of power or authority who uses his or her position to the detriment of the health, safety, welfare and general wellbeing of a vulnerable person.

Perpetrators may be vulnerable adults themselves and agencies have a responsibility to these individuals as well as to the victim.

In what circumstances may abuse occur?

Abuse can take place in any context. It may occur when a vulnerable adult lives alone or with a relative; it may also occur within nursing, residential or day care settings, in hospitals, custodial situations, support services into people's own homes, and other places previously assumed safe, or in public places.

Assessment of the environment, or context, is relevant, because exploitation, deception, misuse of authority, intimidation or coercion may render a vulnerable adult incapable of making his or her own decisions. Thus, it may be important for the vulnerable adult to be away from the sphere of influence of the abusive person or the setting in order to be able to make a free choice about how to proceed. An initial rejection of help should not always be taken at face value.

Patterns of abuse/abusing

Patterns of abuse and abusing vary and reflect very different dynamics. These include: serial abusing in which the perpetrator seeks out and 'grooms' vulnerable individuals. Sexual abuse usually falls into this pattern as do some forms of financial abuse

long term abuse in the context of an ongoing family relationship such as dorr

between spouses or generations

opportunistic abuse such as theft occurring because money has been left around;

Institutional abuse which arises because pressures have built up and/or because of difficult or challenging behaviour

neglect of a person's needs because those around him or her are not able to be responsible for their care, for example if the carer has difficulties attributable to such issues as debt, alcohol or mental health problems

institutional abuse which features poor care standards, lack of positive responses to complex needs, rigid routines, inadequate staffing and an insufficient knowledge base within the service unacceptable 'treatments' or programmes which include sanctions or punishment such as withholding of food and drink, seclusion, unnecessary and unauthorised use of control and restraint or over-medication

failure of agencies to ensure staff receive appropriate guidance on anti-racist and anti-discriminatory practice

failure to access key services such as health care, dentistry, prostheses

misappropriation of benefits and/or use of the person's money by other members of the household

Fraud or intimidation in connection with wills, property or other assets.

What degree of abuse justifies intervention?

Department of Health guidance suggests that harm should be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development. The seriousness or extent of abuse is often not clear when anxiety is first expressed. It is important, therefore, when considering the appropriateness of intervention, to approach reports of incidents or allegations with an open mind.

In making any assessment of seriousness the following factors need to be considered:

The vulnerability of the individual

The nature and extent of the abuse

The length of time it has been occurring

The impact on the individual **and**

The risk of repeated or increasingly serious acts involving this or other vulnerable adults.

What this means in practice is working through a process of assessment to evaluate:

Is the person suffering harm or exploitation?

Is the intervention in the best interests of the vulnerable adult fitting the criteria and/or in the public interest?

Does the assessment account for the depth and conviction of the feelings of the abuse?

Forced marriage

It should be noted that forced marriage falls within the definition of adult abuse. A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor. Legally, it is an abuse of human rights and cannot be justified on any religious or cultural basis. This is not the same as an arranged marriage where a person has a choice as to whether to accept the arrangement or not.

Forced marriage is now a criminal offence under the Anti-social Behaviour, Crime and Policing Act 2014 and is punishable by up to seven years in prison. The law applies to people forced into marriage in England and Wales and UK nationals who are at risk of being forced into marriage abroad. The formal definition of forced marriage under the new legislation is one in which one or both spouses do not consent to the marriage but are coerced into it under duress, including physical, psychological, financial, sexual and emotional pressure. Duress is '[when] the mind of the applicant has been overborne, howsoever that was caused'. In the cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Since 2008, courts have been able to issue civil orders to prevent victims being forced into marriage. Under the new law, breaching a forced marriage protection order has also been criminalised.

The Foreign and Commonwealth Office (FCO) has a Forced Marriage Unit (FMU) dedicated to preventing British nationals being forced into marriage overseas. If a client is worried that they might be forced into a marriage or is worried about someone else they should telephone the Forced Marriage Unit on **020 7008 0151**. Staff are trained to deal with the emotional, cultural and social issues surrounding forced marriage and will help the client to work out a plan of action.

Other FMU contacts:

Email: fmu@fco.gov.uk

Email for outreach work: fmuoutreach@fco.gov.uk

Facebook: Forced Marriage page

Female Genital Mutilation (FGM)

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. Since 1985 the practice has been a criminal offence under the Prohibition of Female Circumcision Act, punishable by up to 14 years in prison. In 2003, the Female Genital Mutilation Act tightened the law to criminalise FGM being carried out on UK citizens overseas. The Crown Prosecution Service announced the first UK prosecutions over FGM in March 2014.

It has been estimated that over 20,000 girls under the age of 15 are at risk of female genital mutilation (FGM) in the UK each year, and that 66,000 women in the UK are living with the consequences of FGM. However, the true extent is unknown due to the 'hidden' nature of the crime. Through a Freedom of Information request to NHS trusts in London, it was discovered in March 2014 that over the last five years a total of 3,939 girls and women have been treated for health issues related to FGM.

FGM is prevalent in Africa, the Middle East and Asia. In the UK, FGM tends to occur in areas with larger populations of communities who practice FGM, such as first-generation immigrants, refugees and asylum seekers. These areas include London, Cardiff, Manchester, Sheffield, Northampton, Birmingham, Oxford, Crawley, Reading, Slough and Milton Keynes.

FGM is carried out for cultural, religious and social reasons within families and communities. For example, it is often considered a necessary part of raising a girl properly, and as a way to prepare her for adulthood and marriage.

Anybody worried about someone who is at risk of FGM or has had FGM must share this information with Social Care or the Police. It is then their responsibility to investigate and protect any girls or women involved.

The Department of Health has published guidelines for professionals who may come into contact with girls and women at risk of FGM, *Multi-Agency Practice Guidelines on Female genital Mutilation (HMG 2011)*. These guidelines contain detailed advice and guidance in relation to the protection of girls who may be at risk of FGM, as well as the care and treatment of women who have already undergone FGM.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216669/dh_124588.pdf

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Extremism

The current threat from terrorism in the United Kingdom can involve the exploitation of vulnerable people, including children, young people and vulnerable adults to involve them in terrorism or activity in support of terrorism. HMG guidance suggests that exposure to, or involvement with, groups or individuals who condone violence as a means to a political end is a particular risk for some children. Young people from their teenage years onwards can be particularly vulnerable through direct contact with radical groups or, increasingly, through the internet. This can put a young person at risk of being drawn in to criminal activity and has the potential to cause significant harm.

HMG *Tackling Extremism in the UK (December 2013)* lists factors in individuals' vulnerability to violent extremism including: peer pressure, the absence of positive mentors and role models, a crisis of identity, links to criminality including other forms of violence, exposure to traumatic events (here or overseas), changing circumstances (eg dislocation to a new environment, including migration and asylum) and a sense of isolation from a community. It is vital that all professionals who have contact with vulnerable individuals are able to recognise those vulnerabilities and help to increase safe choices.

Signs of critical risk factors could include:

Being in contact with extremist recruiters

Articulating support for violent extremist causes or leaders

Accessing violent extremist websites, especially those with a social networking element

Possessing or accessing violent extremist literature

Using extremist narratives and a global ideology to explain personal disadvantage

Justifying the use of violence to solve societal issues

Joining or seeking to join extremist organisations

Significant changes to appearance and/or behaviour.

Where there is any concern that a young person or vulnerable adult may be at risk of radicalisation or involvement in terrorism, staff should speak with the nominated manager who will offer advice and guidance about the appropriateness of making a referral to Social Care. If, at any stage, it is felt that the individual poses an immediate danger to themselves or any other person, the Police should be called immediately. If the concerns about an individual are not serious, the nominated manager may decide that they can be addressed by action within the organisation. If the nominated manager considers that the concerns are more significant, and require a multi-agency response, they will:

Refer their concerns to the Police

Make a referral to Social Care.

The cross-Government strategy to stop people becoming terrorists or supporting violent extremism is known as 'Prevent' (as revised in 2011). Prevent says that all local authority areas should have an agreed process in place for safeguarding vulnerable children and young people susceptible to violent extremism. All staff should understand the nature of the risk and how to respond. In some areas there is a bespoke multi-agency process known as 'Channel', which is an agreed mechanism for referring those at risk and providing support. Further information is available from the ACPO National Community Tensions Team at nctt@acpo.pnn.police.uk

Appendix 5 – Sample Incident Form

For reporting and recording concerns made by children, young people, vulnerable young adults, parents/carers (**where a local incident form is not available**). Please check the local authority website for a local form before using this version.

QCF017

Name of young person or vulnerable adult:	
Age/D.O.B.:	Address:
Parents'/ carers' name/s and contact details:	
Other information: (language, disability, ethnic origin, religion)	
Details of concern – include where incident occurred, name of person who is alleged to have been involved, names of witnesses, date, time etc.	
Has the child or vulnerable young adult been spoken to? If so, what was said?	
Have parents/carers been contacted? If so, what was said and agreed?	
Who has been consulted within EET Group about this concern?	
Action agreed and by whom:	
Recorded by :(Name, contact details and signature)	

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Appendix 6 – Procedure for Safeguarding Investigati

Hearings

This procedure must be followed when an allegation of a safeguarding nature has been made against a member of staff or a former employee.

1. The line manager must be immediately informed of the allegation
2. The line manager will then alert the Safeguarding Officer, who will consult with key managers and decide whether the allegation is a safeguarding issue or a company disciplinary matter. If deemed to be a disciplinary matter, the guidelines set out in the Company's Disciplinary Procedure must be followed. If it is agreed that it is a safeguarding issue, the steps detailed below must be taken

3. **Where the allegation relates to a child or young person under 18**, the Safeguarding Officer must liaise with the Local Authority Designated Officer (LADO)

4. HR will provide the line manager with the dates of employment, details of any changes of address/name, and details of DBS checks made by the company

5. The line manager will prepare and send the following information to the Safeguarding Officer and HR:

A completed Incident *Form for reporting and recording concerns received against a member or former member of staff, including staff from other agencies using our premises (see Appendix 9)* or an overview of the allegation outlining the nature of the allegation e.g. who took the original details of the allegation (date and time); the name of the person involved in the allegation, where and when it took place and full details of the nature of the allegation

Details of any feedback/ concerns/information received from external sources

A copy of the staff member's supervision notes

A full report on the individual, which should include dates of employment, any changes of address/name, details of DBS checks (as supplied by HR) along with any other information e.g. KITs/Annual Reviews, meetings

Previous manager's notes (if applicable).

6. The Safeguarding Officer will liaise with the manager and HR (having taking into account advice received from the LADO if the allegation relates to a child or young person under 18) and communicate their decision as to whether to suspend the staff member pending investigation.

7. If s/he is suspended, HR will send a letter advising on the suspension (*see Appendix 7*)

Care must be taken at this time that details of the alleged allegation are not divulged to anyone other than the Safeguarding Officer and anyone s/he specifically states should be aware of this information, so that the investigation is not jeopardised

8. Once all the details have been gathered, the <Insert company name> Safeguarding Officer will consult with line manager/s to share the known facts of the allegation and the staff

- member's employment history, then brief managers on LA procedures

9. **In the case of an allegation relating to a child or young person u**

The LADO will determine whether there will be a child protection investigation by the LA and/or a criminal investigation by the Police; if this is not required, an internal disciplinary investigation will be carried out by Social Care, lawyer/s, the Youth Offending Service and the Police.

10. **In the case of an allegation relating to a vulnerable adult:**

Where it is suspected that a criminal offence has been committed the Police should be contacted and any criminal investigation by the Police will then take priority over all other lines of enquiry. If a referral is made to Social Care a strategy/discussion meeting will take place to plan and coordinate the investigation.

11. The Safeguarding Officer and HR will make a decision whether to:

Continue suspension pending further investigation.

Start disciplinary procedures subject to consultation with the Safeguarding Management Group and any legal advice in line with the company's Disciplinary Procedure.

Take no further action except provision of a programme of support agreed between the member of staff, their line manager and HR.

Make a referral to the Disclosure and Barring Service.

Appendix 7 – Letter to be sent to member of staff : suspension from work

PRIVATE AND CONFIDENTIAL (Insert Name) (Insert Address)	Human Resources Department <Insert company name> Services Black Country House Rounds Green Road Oldbury West Midlands B69 2DG tel: 0121 521 2300 fax: 0121 557 1502 email: (appropriate manager) web: <a href="http://www.<Insert company name>.co.uk">www.<Insert company name>.co.uk
(Insert Date)	

Dear (Name)

Suspension from work

In accordance with the company’s safeguarding policy, and further to the discussion you had with your manager on (insert date), I confirm that you are suspended on full pay pending an investigation relating to a disclosure, received by the company, which may constitute a safeguarding issue.

This suspension is in order to conduct the investigation impartially and fairly and is in no way a form of disciplinary action against you. You will be able to put your case as part of the investigation. You are, therefore, requested to remain available within reason should I need to contact you.

Once the investigation is complete I will contact you with the outcome.

I would ask, at this stage, that you do not contact any of your work colleagues or have contact with any clients or partnership groups. You may however contact your union representative, if you have one, for advice.

If you require any further clarification about the contents of this letter please do not hesitate to contact me.

Yours sincerely

HR

Appendix 8 – Form for reporting and recording conc against a member or former member of staff, including staff from other agencies using our premises

QCF019

Details of member/ex-member of staff under investigation – e.g. name, position and locations working/worked in, agency employed by, period of employment, previous and current manager (as appropriate):

Contact Details/Last contact details known – include address (home/agency employed by), telephone, mobile numbers:

Date allegation received and by whom:

Nature of concern – include where incident occurred, who made the allegation, date, time etc:

Details of relevant Local Authority Designated Officer and local investigation procedures:

Recorded by – include own name, contact details, signature:

Passed to investigating officer - include name(s), date this form was passed onto and contact details. Attach copies of previous supervision, KIT, Annual Review records, other useful docs if a **<Insert company name>** staff.

Date received by Investigating Officer(s) from **<Insert company name>** and other agency (if appropriate):

Outcome and action agreed:

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Appendix 9 – Glossary of Key Terms

Disclosure and Barring Service (DBS)

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA). The DBS provides criminal record checks for people working with vulnerable groups, reducing the risk that unsuitable people can gain this type of employment.

Employers can ask successful candidates to apply to the DBS for Disclosure, which will contain information about their criminal record. The Bureau issues two types of Disclosure; each representing a different level of check. Work with children and young people or vulnerable adults qualifies for the most detailed (Enhanced) checks.

DBS is responsible for:

- processing requests for criminal records checks
- deciding whether it is appropriate for a person to be placed on or removed from a barred list
- placing or removing people from the DBS children's barred list and adults' barred list for England, Wales and Northern Ireland.

Local Safeguarding Children Boards (LSCB)

LSCB 's were established for each Local authority area under the Children Act 2004. The core membership includes Local authorities, health bodies, Police and other bodies. The LSCB is the key statutory mechanism for agreeing how the relevant organisations in each local area will co-operate to safeguard and promote the welfare of children, and for ensuring the effectiveness of what they do.

The scope of the LSCB role falls into three categories:

- They engage in activities that safeguard all children and aim to identify and prevent maltreatment, or impairment of health or development, and ensure that children are growing up in circumstances consistent with safe and effective care

- They lead and co-ordinate proactive work that aims to target particular groups

- They lead and co-ordinate arrangements for responsive work to protect children who are suffering, or at risk of suffering, maltreatment.

Local Authority Designated Officer (LADO)

LADOs are involved in the management and oversight of individual cases where it is alleged that a person working with children (including a volunteer) has:

behaved in a way that has harmed a child, or may have harmed a child

possibly committed a criminal offence against or related to a child

behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

These officers provide advice and guidance to employers and voluntary organisations, in addition to liaising with the Police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.

The Common Assessment Framework

The Common Assessment framework (CAF) is a standardised approach to conducting assessments of children's additional needs. It is typically initiated where the needs identified are beyond the scope of a single agency or where there is uncertainty and no clear pathway for additional support. The CAF process involves the assessment of the child or young person's strengths and needs and the identification of what actions should be taken to address those needs.

You cannot undertake a CAF unless the child or young person and/or their parent or carer agrees. If consent is refused, and you are concerned about the safety or welfare of the child or young person, you should follow LSCB procedures or contact your local safeguarding or child protection team.

Where a multi-agency response is required, a Team Around the Child (TAC) is formed which brings together practitioners from across different services. The common assessment and delivery plan are regularly reviewed by the TAC to monitor progress toward agreed outcomes. The review identifies any unmet or additional needs for the child or young person's smooth transition between universal, targeted and specialist services.

Further information about the Common Assessment Framework, including managers' and practitioners' guides to the Common Assessment Framework is available at:

<http://webarchive.nationalarchives.gov.uk/20130903161352/http://www.education.gov.uk/childrenandyoungpeople/strategy/integratedworking/caf/a0068957/the-caf-process>