

North Wales Training & Copa Apprenticeships - Policies & Procedures

Safeguarding Children and Vulnerable Adults

Key Information:

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| 1-4 | 2017-2020 | Previous Versions | AJ |
| 5 | 22/09/2021 | Redraft - Inclusion of dealing with allegations against staff, Inclusion of Consortium reporting | MC |
| 6 | 18/11/2021 | Additional Annex F added – External agencies contact details | MC |
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1. Introduction

1. North Wales Training acknowledges its duty of care to safeguard and promote the welfare of children and vulnerable adults and is committed to ensuring that its safeguarding practice reflects its statutory responsibilities and relevant guidance.
2. This policy recognises that the welfare and interests of these learners is paramount in all circumstances. It aims to ensure that regardless of age, gender identity, religion or belief, ethnicity, sex, disability, sexual orientation or socio-economic background, all children and adults will have:
 - A positive and enjoyable experience in all their engagement with North Wales Training, whether on programme in the centre or whilst on work placement or Apprenticeship with an employer, or through any online, social media and social networking site contact; and are protected from abuse and are:
 - Protected from abuse whilst undertaking any training or activities with North Wales Training or Copa Apprenticeships.
3. This policy covers both North Wales Training and Copa Apprenticeships and applies to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word “staff” is used to denote all these groups.

2. Legislation

1. North Wales Training aims to meet legislative requirements and good practice in safeguarding. There are a number of statutory regulations which place a responsibility on the company to protect young people and adults at risk. This statutory framework includes:
 - a. The Children Act 1989/2004
 - b. The education Act 2002
 - c. Working Together to Safeguard Children 2018
 - d. Information Sharing 2018
2. Additional legislation specific to our operations in Wales:
 - a. The Wales Safeguarding Procedures
 - b. Keeping Learners Safe (Welsh Government)
 - c. The Rights of Children and Young Persons (Wales) Measure 2011
3. Additional legislation specific to our operations in England:
 - a. Keeping Children Safe in Education 2021

3. Definitions

1. **‘Safeguarding’** is about embedding practices throughout the organisation to ensure the protection of children and vulnerable adults wherever possible and responding to circumstances that arise.
2. **‘Abuse’** can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender, or culture. It can take several forms, including the following:
 - a. Physical abuse
 - b. Domestic violence and Domestic abuse
 - c. Sexual abuse
 - d. Psychological abuse
 - e. Financial or material abuse
 - f. Modern slavery
 - g. Discriminatory abuse
 - h. Organisational abuse
 - i. Neglect and acts of omission
 - j. Self-neglect
 - k. Peer on peer abuse
3. **‘Child’** is defined as: Any person under the age of 18.
4. **‘Young Person’** is defined as: Any learner under the age of 18. The terms child and young person are used synonymously throughout this policy.
5. **‘Vulnerable Adult’** is defined as: A person aged 18 years or over who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of unable to protect him or herself against significant harm or exploitation.
6. **‘Physical Abuse’** - this may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring.
7. **‘Neglect’** - neglect is the persistent or severe failure to meet a child, young person or vulnerable adult’s physical and/or psychological needs which can result in serious impairment of the health or development of the individual.
8. **‘Sexual Abuse and Exploitation’** - sexual abuse involves a child, young person or vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the child, young person or vulnerable adult to be aware that the activity is sexual and the apparent consent of the child, young person or vulnerable adult is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.
9. **‘Emotional Abuse’** - emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child, young person and vulnerable

adult's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive cyber-bullying through electronic communications.

10. **'Financial Abuse'** - where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.
11. **'Significant Harm'** - some children may be in need because they are suffering or likely to suffer significant harm. The Children Act V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

Specific safeguarding issues - All staff should have awareness of the following safeguarding issues and of the legislative duty in relation to these concerns.

12. **'Honour-based violence'** - honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse and should be handled and escalated as such.
13. **FGM mandatory reporting duty** - from October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales. Professionals must make a report to the police, if, in the course of their duties:
 - a. They are informed by a girl under the age of 18 that she has undergone an act of FGM.
 - b. They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.
14. **Forced Marriage** - forced marriage is a term used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.
15. **Peer on Peer Abuse** - peer on peer abuse is a significant issue. It must never be tolerated, dismissed, or ignored.

Peer on peer abuse will be minimised through the vigilance and awareness of staff to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment.

Most cases of learners hurting other learners will be dealt with under our Bullying Policy, however, this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- a. Is serious, and potentially a criminal offence
- b. Could put learners at our centres at risk
- c. Is violent
- d. Involves learners being forced to use drugs or alcohol
- e. Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

We will minimise the risk of peer-on-peer abuse by:

- f. Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- g. Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
- h. Ensuring our tutorials provision helps to educate learners about appropriate behaviour and consent
- i. Ensuring learners know they can talk to staff confidentially
- j. Ensuring staff are trained to understand that a learner harming a learner could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

16. **Sexting** - if staff are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), they must report it to the Designated Safeguarding Lead immediately.

Staff must not:

- a. View, download or share the imagery yourself, or ask a learner to share or download it. If staff have already viewed the imagery by accident, this must be reported to the Safeguarding Officer.
- b. Delete the imagery or ask the learner to delete it
- c. Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the Designated Safeguarding Lead's responsibility)
- d. Share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers
- e. Say or do anything to blame or shame any young people involved

Staff should explain that they need to report the incident and reassure the learner that they will receive support and help from the Safeguarding Officer.

17. **Child on child sexual violence and sexual harassment** – Where any reports are made of child-on-child sexual violence or sexual harassment these must be dealt with seriously and quickly. The normal disclosure protocols apply. Where such an allegation is made, the Designated Safeguarding Lead will conduct a thorough risk assessment that considers:

- a. The victim, especially their protection and support
- b. The alleged perpetrator: and
- c. All the other children (and, if appropriate, adult learners and staff) at our centres,
- d. especially any actions that are appropriate to protect them.

This will be recorded and communicated to all staff that are required to know. Both victim and (alleged) perpetrator will receive appropriate support mechanisms from North Wales training on a case-by-case basis.

4. Roles & Responsibilities

1. **Designated Safeguarding Lead (DSL)** - The Curriculum & Learning Manager is the Designated Safeguarding Lead for North Wales Training. As such, they take overall ownership of the policy and will promote the importance of safeguarding within the company. The responsibilities of the Designated Safeguarding Lead are outlined in Annex A.
2. **Deputy Designated Safeguarding Lead (DDSL)** The Operations Manager Youth Engagement is the Deputy Designated Safeguarding Lead. As such, will deputise in the absence of the Designated Safeguarding Lead, assist the Designated Safeguarding Lead in all matters of safeguarding and child protection across the company. They may take part in strategy discussions and inter-agency meetings and contribute to the review of policies and procedures.
3. **The NWT Board:** Ensuring that North Wales Training has effective policies and procedures in place for Safeguarding
4. **Senior Management Team** have responsibility to ensure that the policy and procedure is fully implemented across the company and will ensure sufficient resources (time and money) are allocated to ensure that the policy can be effectively implemented.
5. **All staff** have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

5. Safe Recruitment and Disclosure and Barring Service

1. The safe recruitment of staff is the first step to safeguarding and promoting the welfare of children, young people, and vulnerable adults in education. Recruitment of staff will be in line with the company's Safe Recruiting Policy, which includes the following good practice recruitment processes:
 - a. Providing the following safeguarding statement in recruitment adverts or application details – 'recruitment is done in line with safe recruitment practices.'
 - b. Job or role descriptions for all roles involving contact with vulnerable adults will contain reference to safeguarding responsibilities.
 - c. There are person specifications for roles which contain a statement on core competency with regard to safeguarding.
 - d. Shortlisting is based on formal application processes/forms and not on provision of CVs.
 - e. Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification.
 - f. DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with vulnerable adults. Portable/ carry over DBS checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts.
 - g. No formal job offers are made until after checks for suitability are completed (including DBS and 2 references).
 - h. We will ensure that established staff and roles are regularly reviewed through e.g. A 3-year rolling programme of re-checking DBS's is in place for holders of all identified posts.
 - i. Existing staff who transfer from a role which does not require a DBS check to one which involves contact with children / vulnerable adults will be subject to a DBS check.

6. Service delivery contracting and sub-contracting

1. North Wales Training works with several sub-contractors and partnerships and with regards to safeguarding, will ensure:
 - a. There will be systematic checking of safeguarding arrangements of partner organisations.
 - b. Safeguarding will be a fixed agenda item on any partnership reporting meetings.
 - c. Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non-compliance procedures.

7. Communications, Training and Support for Staff

North Wales Training commits resources for induction, training of staff, effective communications and support mechanisms in relation to Safeguarding.

1. **Induction** will include:
 - a. Discussion of the Safeguarding Policy (and confirmation of understanding)
 - b. Discussion of other relevant policies
 - c. Ensure familiarity with reporting processes, the roles of line manager and Designated Senior Manager (and who acts in their absence)
 - d. Initial training on safeguarding by completing the online training package.
2. **Training**, all staff who, through their role, are in contact with children and vulnerable adults will have access to safeguarding training at an appropriate level. Sources and types of training will include:
 - a. Update training sessions
 - b. Annual Refresher Training
 - c. Monthly 'Talking Points Train the Trainer sessions
3. **Communications** and discussion of safeguarding is important across the organisation will include safeguarding as a regular agenda item across:
 - a. Team meetings
 - b. SMT meetings
 - c. Board meetings
 - d. One to one meetings (formal or informal)
 - e. Monthly 'Talking Points' sessions
 - f. Staff observations
4. **Support** - We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include:
 - a. Debriefing support for paid and unpaid staff so that they can reflect on the issues they have dealt with.
 - b. Seeking further support as appropriate e.g. access to counselling.
 - c. Staff who has initiated protection concerns will be contacted by the DSL within a week.

8. Reporting

1. Staff should be aware, that witnessing, being made aware of, or having a child or vulnerable adult disclose abuse to you can generate mixed feelings which may include disbelief, anxiety, anger and a sense of being overwhelmed. To guide staff through these situations the following provides simple and straight forward actions that you need to take.
2. Where you have concerns about a child or vulnerable adult but are unsure about whether what you've seen, heard or been informed about is abusive you should always seek advice and guidance. It is always better to err on the side of caution than not take any action. In this situation you should first contact the Designated Safeguarding Lead (DSL).
3. The details of the Designated Safeguarding Lead (DSL) and alternative internal contacts is at Annex B. If none of those listed are available, the NSPCC Helpline 0808 800 5000 can also be contacted out of hours.
 - a. Actions to be taken (Flow chart and additional Guidance for staff on dealing with safeguarding Incidents is available at Annex C):
 - i. In the event of a threat to a child or vulnerable adult's life you should, alert the emergency services immediately.
 - ii. In most instances, there may be a threat to the wellbeing of the child or vulnerable adult, but that threat may not warrant the attendance of the emergency services. Instead, you should immediately inform the DSL.
 - iii. you should contact the DSL at the first opportunity. You should also inform your manager. Your manager will not be expected to give you any advice or guidance but should be made aware of the situation.
 - i) You will then need to record:
 - The concerns
 - The date, time and place
 - The people involved (including what details that are known about the child or vulnerable adult)
 - The actions agreed and taken (including who agreed/did what)
 - The disclosure if made by the child or vulnerable adult.
 - ii) The Safeguarding Incident Report Form is at Annex E for recording the information that you will need to pass on to the DSL.
 - iii) The DSL will decide on any subsequent action that needs to be taken and will keep you informed. Your manager should also be kept informed.
 - iv) The DSL will contact the local Social Services (Wales) or LADO (England) and or the Police if required. List of external agencies contact details at Annex D.
 - v) The DSL will log the incident on the central safeguarding list.

- vi) The DSL will inform the Director, Learner Services - Grŵp Llandrillo-Menai if an incident meets the threshold of external service intervention (i.e. when a referral is made to the Police, social services, prevent.)

9. Dealing with Allegations of Abuse Against Staff

1. Children have a right to be safeguarded and protected from harm. Any allegation of abuse made by or on behalf of a child should be taken seriously and the child should be listened to and dealt with sensitively.
2. North Wales Training also have a duty of care to their staff. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty.
3. It is essential that any allegation of abuse made against a member of staff or volunteer in North Wales Training or Copa Apprenticeship setting is dealt with fairly, quickly and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation. The quick resolution of allegations of abuse should be a clear priority to the benefit of all concerned. All unnecessary delays should be eradicated.
4. In the event of an allegation report, the DSL should follow the procedure at Annex D.

10. Monitoring

5. The organisation will monitor the following Safeguarding aspects:
 - a. Safe recruitment practices
 - b. DBS checks undertaken
 - c. References applied for new staff
 - d. Records made and kept of supervision sessions
 - e. Training – register/ record of staff training on child/ vulnerable adult protection
 - f. Monitoring whether concerns are being reported and actioned
 - g. Checking that policies are up to date and relevant
 - h. Reviewing the current reporting procedure in place
6. The DSL will work with the Director, Learner Services - Grŵp Llandrillo-Menai, to carry out a consortium annual monitoring review.

11. Data Protection and Sharing Information

1. North Wales Training recognises that sharing information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect.
2. Staff need to know that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. We will operate in line with the Governments Seven Golden Rules listed in the 'Information Sharing 2018'
 - a. Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.
 - b. Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
 - c. Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
 - d. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
 - e. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
 - f. Necessary, proportionate, relevant, accurate, timely and secure:
 - g. Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion and is shared securely.
 - h. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.
3. Safeguarding incidents will recorded on the Central Incident Log that is securely stored on the Company SharePoint site with the Safeguarding Incident Report Forms.

12. Related Policies & Procedures

1. Harassment & Bullying Policy
2. Promoting Health & Wellbeing
3. Online Safety Policy
4. Safer Recruitment Policy
5. Prevent Policy
6. Health & Safety Policy
7. Whistleblowing Policy

Annex A
Responsibilities of a Designated Safeguarding Lead

Responsibilities of a Designated Safeguarding Lead

The DSL has a number of important responsibilities to fulfil on an ongoing basis. As the lead, it's also part of their duty to ensure others in the organisation understand and follow safeguarding procedures. They will also work closely with other senior individuals to coordinate safeguarding duties.

The responsibilities of a designated safeguarding lead include:

- Being available for all staff to discuss any safeguarding issues or concerns. They should ensure that all staff are aware of the DSL and deputy contact details.
- Ensuring that cases of suspected or actual child protection or safeguarding concerns are referred to the appropriate agencies. The DSL will gather further information and evidence if needed.
- Ensuring that all staff are fully trained in safeguarding and know how to spot and raise concerns. They will also help to maintain an effective staff supervision programme.
- Undergoing regular refresher training themselves to ensure their safeguarding knowledge is as up to date as possible and in line with new guidance.
- Ensuring that adequate reporting and recording systems are in place for safeguarding procedures, and that there are appropriate transferal procedures for records if students move.
- Ensuring that the company's safeguarding policies and procedures are up to date with the most recent statutory guidance, and that everyone who has safeguarding duties are familiar with any updates.
- Communicating with learner families about policies and procedures, as well as any concerns or referrals where appropriate.
- Complying with any Social Services, Local Safeguarding Children Partnership (LSCP) requirements.
- Ensuring their organisation has sufficient safer recruitment procedures.
- Being aware of any children who may require specific safeguarding needs and have specific vulnerabilities.

Contact Details – Designated Safeguarding Lead

Child abuse concerns and concerns about staff or advice and guidance (the DSLs) and the numbers to use out of hours.

REMEMBER - IF YOU FEEL THE CHILD IS IN IMMEDIATE DANGER CALL 999 AND CONTACT THE POLICE IMMEDIATELY

Designated Safeguarding Lead – Martin Craven

- Office 01492 543431 (Ext 235)
- Mobile 07435 720896

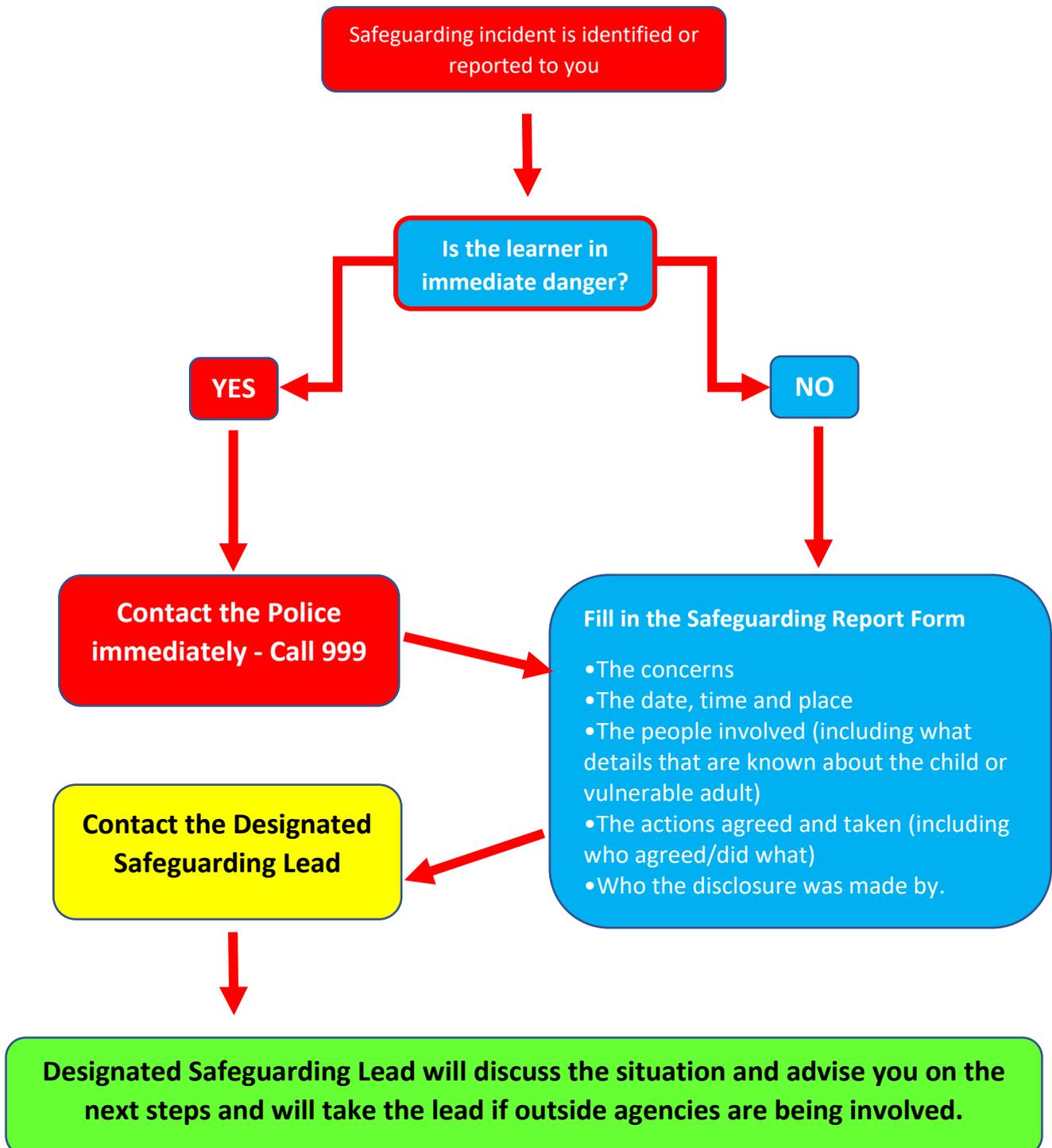
Deputy Designated Safeguarding Lead – Hayley Davies

- Mobile 07707 286595

- NSPCC ChildLine: 0800 1111 (for Children and Young People)
- NSPCC Helpline: 0808 800 5000 (For adults who are concerned about a Child or Young Person).

ACTION FLOW CHART & ADDITIONAL STAFF GUIDANCE FOR DEALING WITH SAFEGUARDING INCIDENTS

ACTION FLOW CHART



ACTION FLOW CHART & ADDITIONAL STAFF GUIDANCE FOR DEALING WITH SAFEGUARDING INCIDENTS

FREQUENTLY ASKED QUESTIONS

| Question | What To Do | Key Points |
|--|--|---|
| What should I do if a learner asks to speak to me in confidence about what could be a child protection matter? | Arrange for a third person (who is acceptable both to you and the learner) to be present and make sure you are out of hearing and sight of others. Reassure them and listen carefully to what they are saying, noting down what is said while the conversation is taking place – do not ask questions. Make no judgement about what you've heard and stay calm. | You cannot promise confidentiality, inform them that you might have to tell someone - Observe, Record and Report |
| Who is responsible for reporting concerns to the appropriate authorities? | You must inform the Designated Safeguarding Officer and they will contact the appropriate authorities. | Talk to your Designated Safeguarding Officer as soon as possible. |
| What do I do if I think a child is in immediate danger? | In urgent cases, where you have an immediate concern about the welfare of a child who may be at risk , you must make direct contact with the police by calling 999, reporting later to your Designated Safeguarding Officer. | Have the learner's name and address and the name and address of their parent/guardian/carer available. Refer to your notes – don't filter or withhold any information. You have no right to detain a learner but you should provide a "place of safety", if possible, until the police or local authority assumes responsibility. |
| Should I contact parents/guardians/carers? | The parents or guardians/carers of the learner subject of the disclosure or allegation should normally be informed by the Designated Safeguarding Officer as soon as a report is being made to the police or social services | If parents or guardians/carers are implicated, do not inform them but request advice from the police or social services. |
| What should I do if I hear allegations/ have suspicions/get a report about potential abuse, and North Wales Training staff are implicated? | In cases where you hear allegations about yourself or your colleagues or hold suspicions or concerns in which your colleagues are implicated, you should consult your Line Manager without delay. If your Line Manager is implicated in any allegations or suspicions you should immediately consult your Designated Safeguarding Officer whose number 01492 543431. | Your Safeguarding Officer will ensure that the appropriate persons are informed. |
| How many people should be informed? | Only discuss child protection issues with the Designated Safeguarding Lead. | For reasons of confidentiality, the number of people to be informed of alleged child abuse cases reported to the authorities is to be kept to a minimum ('need to know'). |
| What action do the North Wales Training take if the case is closed by the police or social services? | If North Wales Training ascertains that the social services/civil police decide to take no further action, North Wales Training will usually also close the case. | Police and social services have primacy on Child Protection matters. |

ACTION FLOW CHART & ADDITIONAL STAFF GUIDANCE FOR DEALING WITH SAFEGUARDING INCIDENTS

CONTACTING APPROPRIATE AGENCIES

Contacting appropriate agencies is normally the role of the Designated Safeguarding Officer, however, if the learner is in immediate danger you may need to.

Contact Social Services or the Police: ask for the Duty Officer

(or Emergency Duty Team) and say that you wish to discuss a child protection matter:

| | |
|--|---|
| <ul style="list-style-type: none">• ask for the name of the person with whom you are speaking• discuss all the information you have (nothing is to be filtered or withheld)• state your intention to advise the North Wales Training Safeguarding Officer• ask if anyone else should be informed• keep a record of your conversation and of any advice given | <p>REMEMBER:</p> <ul style="list-style-type: none">-- never do nothing-- don't assume someone else will do something-- never push a child for more information-- never discuss your worries with the suspected abuser |
|--|---|

YOU MUST REFER – YOU MUST NOT INVESTIGATE

ACTION FLOW CHART & ADDITIONAL STAFF GUIDANCE FOR DEALING WITH SAFEGUARDING INCIDENTS

DO'S AND DON'TS IN SAFEGUARDING

DO

- Treat all children, young people and vulnerable adults with respect
- Ensure that your own conduct is always an example of good practice
- Ensure that you are not alone with a child, young person or vulnerable adult and that you are at least within sight of others
- Respect the rights of individuals to have their privacy and dignity assured
- Remember that someone else might misinterpret your actions, no matter how well - intended
- Recognise that special caution is needed if you are discussing sensitive issues with children, young people and vulnerable adults with their parents/carers
- Be aware of other staff, be vigilant and act to help keep themselves and children, young people and vulnerable adults safe. Be prepared to challenge their actions
- Operate within North Wales Training's safeguarding policies and practices Record a written report of any incident/disclosure, detailing where possible exactly what was said and recording times and individuals involved.

DON'T

- Have inappropriate physical contact with children, young people or vulnerable adults e.g. a hug
- Encourage inappropriate attention seeking behaviour
- Speak to a child, young person or vulnerable adult in an inappropriate way or make a suggestive/derogatory remarks or gestures in their presence
- Discourage children, young people or vulnerable adults who want to talk to you about attitudes or behaviour of others they do not like
- Draw conclusions about others without checking facts
- Exaggerate or trivialise about issues
- Discuss personal issues about a child, young person or vulnerable adult or their family with others, in order to protect them
- Rely on your good name or that of the Company in order to protect you from scrutiny of your conduct
- Think it could never happen to you
- Ignore the protection guidelines and safeguarding procedures operating within North Wales Training

DEALING WITH ALLEGATIONS OF ABUSE AGAINST A MEMBER OF STAFF

Procedure

1. Allegation reported to Designated Safeguarding Lead (DSL)
2. DSL confirms the following details
 - a. That an allegation has been made.
 - b. What is alleged to have occurred.
 - c. When and where the episode is/are alleged to have occurred.
 - d. Who was involved; and
 - e. Any other persons present.
3. Within 1 working day, the DSL informs the local Social Services. The purpose of the initial discussion is for the Social Services and the DSL to consider the nature, content and context of the allegation. Advice and guidance will be provided by the Social Services about thresholds and a course of action agreed.
4. DSL informs Managing Director of situation.
5. North Wales Training have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.
6. Following the discussion with Social Services, a decision will need to be made by the Senior Management Team with regards to the member of staff being suspended during the investigation. In response to an allegation all other options should be considered before suspending a member of staff: suspension should not be the default option. An individual should be suspended only if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification should be recorded by the employer and the individual notified of the reasons.
7. At the referral to children's social care stage, the DSL will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
8. Outcome of initial discussion If thresholds for harm are not met but there is sufficient concern about the adult's behaviour then a meeting will be arranged to evaluate the concern. Other areas of concern around conduct and behaviour can be dealt with through internal procedures. If threshold for harm or risk of harm is met the allegation will be referred to Police and Children's Social Care and a strategy meeting arranged.
9. Who attends strategy meeting:
 - a. DSL
 - b. Police
 - c. Social Care Investigation Officer
 - d. Team Manager /Social Worker for child
 - e. Fostering Team Manager/Supervising Social Worker
 - f. Medical examiner

10. Outcome of strategy meeting will then be classified under one of the following headings:

- a. Substantiated:**
there is sufficient evidence to prove the allegation.
- b. False:**
there is sufficient evidence to disprove the allegation.
- c. Malicious:**
there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false.
- d. Unfounded:**
there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.
- e. Unsubstantiated:**
this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term therefore does not imply guilt or innocence.

11. Conclusion of a case where the allegation is substantiated

- a. If the allegation is substantiated and the individual is dismissed or North Wales Training ceases to use their services, or the individual resigns or otherwise ceases to provide their services, a referral to the DBS for consideration of whether inclusion on the barred lists is required. In Wales a referral would also be made to the Education Workforce Council (EWC).

12. Individuals returning to work after suspension

- a. If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the Senior Management Team will consider how best to facilitate this.
- b. The Senior Management Team will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending a programme with North Wales Training.

13. Unsubstantiated, unfounded, false or malicious allegations, if an allegation is:

- a. Determined to be unsubstantiated, unfounded, false or malicious, the Social Services and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- b. Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

14. Confidentiality and information sharing

- a. North Wales Training will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

- b. The DSL will take advice from the LADO, police and children's social care services, as appropriate, to agree:
 - i. Who needs to know about the allegation and what information can be shared
 - ii. How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
 - iii. What, if any, information can be reasonably given to the wider community to reduce speculation
 - iv. How to manage press interest if, and when, it arises

15. Record-keeping

- a. The DSL will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
- b. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
- c. For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
 - i. A clear and comprehensive summary of the allegation
 - ii. Details of how the allegation was followed up and resolved
 - iii. Notes of any action taken, decisions reached and the outcome

SAFEGUARDING INCIDENT REPORT FORM

This form will be used by members of staff to record disclosures or suspicions of abuse. The completed form should be sent to the Designated Safeguarding Lead dealing with the allegations.

| | | | |
|---|--|-------------------------------------|--|
| Your name | | Your position | |
| Place of work | | Contact phone number | |
| The child or vulnerable adult details | | | |
| Name | | Date of birth | |
| Address/phone number | | | |
| Current Programme | | | |
| Other relevant details about the child: <i>e.g. family circumstances, physical and mental health, any communication difficulties.</i> | | | |
| Parent/guardian/carers details | | | |
| Details of the allegations/suspicions | | | |
| <i>Are you recording:</i> | | <i>Date and time of disclosure:</i> | |
| Disclosure made directly to you by the child or vulnerable adult? | | | |
| Disclosure or suspicions from a third party? | | <i>Date and time of incident:</i> | |
| Your suspicions or concerns? | | | |
| Details of the allegation/suspicions. <i>State exactly what you were told/observed and what was said. Use the persons own words as much as possible</i> | | | |
| Action taken so far: | | | |
| Signed | | Date | |

To be completed by the Designated Safeguarding Lead

| | |
|-----------|-----------------------------|
| Your name | Date & Time report received |
|-----------|-----------------------------|

| | | | |
|--|--|--|------|
| Appropriate Authority contacted? (LEA, Police, Child/Social Services) | | No referral (no further action needed) | |
| Details of person contacted: | | Date & Time: | |
| Summary of action taken: | | | |
| Signed | | | Date |

| | | | |
|---|--|--|------|
| Details of any follow up action taken/received | | | |
| Summary of action taken: | | | |
| Signed | | | Date |

EXTERNAL AGENCIES CONTACT DETAILS

| CONCERNED ABOUT A CHILD? If you know a child who is at risk of abuse or is being abused, it is very important that you let the council, or the police know. If the individual is in direct danger, call the Police immediately on 999. If not, telephone Social Services as soon as possible to share your concerns. | | CONCERNED ABOUT AN ADULT? If you know of an adult who is at risk of abuse or is being abused, it is very important that you let the council, or the police know. If the individual is in direct danger, call the Police immediately on 999. If not, telephone Social Services as soon as possible to share your concerns. | |
|---|--|--|--|
| Anglesey 01248 725 888 01248 353 551 (Out of hours) | Gwynedd 01758 704 455 01248 353 551 (Out of hours) | Anglesey 01248 750057 01248 353551 (Out of hours) | Gwynedd Adults Department, Health and Wellbeing 01766 772577 01248 353551 (Out of hours) |
| Conwy Social Services: 0300 456 1111 01492 515777 (Out of hours) | Denbighshire 01824 712200 Monday – Friday 9am – 5pm 0345 053 3116 Evenings and weekends | Conwy 0300 4561111 (Office hours) 0300 1233079 (Out of hours) | Denbighshire 0300 4561000 0345 053 3116 (Out of hours) |
| Flintshire 01352 701 000 0345 053 3116 (Out of hours) | Wrexham 01978 292 039 0345 053 3116 (Out of hours) | Flintshire 03000 858858 0845 053 3116 (Out of hours) | Wrexham 01978 292066 0345 053 3116 (Out of hours) |
| West Cheshire Cheshire West and Chester Safeguarding Children Partnership 0300 123 704 01244 977 277 (Out of hours) | Colchester Essex Safeguarding Children Board 0345 603 7627 | West Cheshire Cheshire West and Chester Local Safeguarding Adults Board 0300 123 7034 01244 977277 (Out of hours) | Colchester Essex Safeguarding Adult Board 0345 6037630 |