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Safeguarding Policy September 2021-2022	
AIM:	To provide clear direction to staff and others about expected codes of behaviour in dealing with all aspects of Safeguarding.
NAMED STAFF/PERSONNEL WITH SPECIFIC RESPONSIBILITY FOR SAFEGUARDING	<ul style="list-style-type: none">• Lead – Steve Egan• Deputies – Anita McGreevy & Laura Webster• Nominated Trustee – Holly Clare
DISTRIBUTION:	<ul style="list-style-type: none">• CWP staff, volunteers and learners• Service users• Website
DATE FOR IMPLEMENTATION:	1 st September 2021
DATE OF NEXT REVIEW:	31 st August 2022
AUTHOR:	Steve Egan – CEO
APPROVED BY:	Bill Adams – Chair of Trustees

Safeguarding Policy

Purpose of a Safeguarding Policy

This is the main policy for keeping learners safe whilst at CWP

An effective Safeguarding policy is one which provides clear direction to staff and others about expected codes of behaviour in dealing with Safeguarding issues. An effective policy also makes explicit CWP's commitment to the development of good practice and sound procedures. This ensures that Safeguarding concerns and referrals may be handled sensitively, professionally and in ways which prioritise the needs of the individual in question.

Introduction

CWP staff and volunteers work with vulnerable people. All CWP staff members, trainees and volunteers play an important part in promoting the safety and protection of vulnerable people with whom the organisation works. The aim of this policy is to ensure that vulnerable people are protected from harm while they are in receipt of services from CWP. We will achieve this aim by:

- Actively encouraging a climate through which protection issues are regarded as an essential part of CWP activities and events.
- Ensuring that the appointment of CWP staff and volunteers are made in line with these guidelines.
- Adopting protection guidelines that give clear procedures and a code of good practice for the staff and volunteers
- Planning all events and activities so that protection issues are properly addressed.
- Sharing information on protection and good practice with children, young people, vulnerable adults, parents, staff and volunteers.
- Issuing guidelines about dealing with the disclosure or discovery of abuse and sharing information about concerns with partners and agencies that need to know.
- Providing appropriate training and support for CWP staff and volunteers in the processes and procedures of vulnerable people protection.
- Following carefully the procedures for the recruitment and selection of CWP staff and volunteers.
- This policy therefore aims to provide guidance to CWP staff and volunteers on working more effectively with vulnerable people to safeguard them from abuse.
- The procedures outlined here are in line with good practice and the relevant legislation relating to working with vulnerable people.
- It is the duty of all those employed or engaged by CWP to bring any concerns about possible abuse to the notice of lead safeguarding person/s.
- It is the responsibility of CWP Staff to bring CWP's Safeguarding Procedures to the attention of the partner organisations we work with and ensure that they are acceptable to these organisations.

This policy was written by the Senior Leadership Team of CWP, consulting and accessing, Lancashire County Council policies and procedures.

- Lancashire Safeguarding Children Board 'Safeguarding Children Procedures' (May 2015) - <http://panlancashirescb.proceduresonline.com/index.htm>
- Keeping Children Safe in Education (KCSIE 2018) (DfE 2018) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working Together To Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (DfE 2015); <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- What To Do If You're Worried A Child Is Being Abused (DfE 2015) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/416455/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- Disqualification under the Childcare Act 2006 <https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

This policy applies to all adults, including volunteers, working in or on behalf of the organisation.

CWP Safeguarding Policy

Sept 2021

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Safeguarding Policy

Definitions

In the context of this policy:

Vulnerable people include children, young people and vulnerable adults.

A young person is defined as anyone aged under 18.

A vulnerable adult is defined as anyone aged 18 or more who is or may be in need of community care services by reason of mental, physical or learning disability, illness or frailty.

Framework

Roles & Responsibilities

The CWP CEO or someone designated on his/her behalf has ultimate responsibility for the implementation of CWP Safeguarding policy and procedures. In order to meet these responsibilities the CEO will:

- Designate a member of staff as Safeguarding Co-ordinator. This is a crucial role as they are responsible for the coordination and implementation of Protection of Vulnerable People policies. The Coordinator will provide ongoing support and guidance to all colleagues and volunteers.
- Create a culture where all incidents of suspicion, poor practice and allegations of inappropriate behaviour are taken seriously and responded to swiftly according to this procedure.
- Ensure that individuals working with vulnerable people receive appropriate training and ongoing support.
- Ensure that individuals adhere to these guidelines for best practice contained in this paper.
- Share information with appropriate agencies regarding protection of vulnerable people.

All individuals working with vulnerable people must adhere to these procedures and report any suspected abuse of vulnerable people to their line managers. Any breaches of these procedures may make them subject to disciplinary proceedings.

Training

It is the responsibility of the CEO to ensure the following is implemented in consultation with the Chair of Trustees.

The CEO will ensure that all new staff and volunteers are given a thorough induction into CWP Policy and procedures and receive appropriate training as part of ongoing CPD.

The Quality Manager will provide support and supervision for staff involved in working with vulnerable people to ensure that they are aware of their responsibilities and they know how to report their concerns and suspicions of any abuse to vulnerable people.

Specifically: To Ensure that all staff and volunteers:

- Read at least part one of the most recent DfE Keeping Children Safe in Education.
- Be aware of systems within CWP which support safeguarding and these will be explained to them as part of staff induction. This includes: the Safeguarding policy; e-safety policy, the behaviour policy, reporting and recording incidents procedure, and the identity and role of the DSL.
- Receive appropriate and regular child protection training which is regularly updated.
- Be aware of the signs of abuse, self-harm, and neglect so that they are able to identify cases of children who may be in need of help or protection.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

Understand that, whilst anyone can make a referral to CSC, that the correct procedure is to report their concerns to the DSL in the first instance. They should however, escalate their concerns for the child if they do not feel those concerns have been taken seriously &/ or procedures have not been followed &/or the child's situation does not appear to be improving. They can make a referral to CSC by ringing 0300 1236720 and follow this up in writing on the CSC referral form within 48 hours and emailing it securely to <mailto:cypreferrals@lancashire.gov.uk>. Prior to this, they can access advice from the safeguarding in education team on 01772 531196

CWP Safeguarding Policy

Sept 2021

Owner: Steve Egan

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Safeguarding Policy

CODE OF GOOD PRACTICE FOR SAFEGUARDING VULNERABLE PEOPLE

CWP recognises that protecting vulnerable people is everybody's business. Alleged perpetrators of abuse or those that pose a threat of harm could be anybody and could therefore include partner organisation's or Local Authority staff, parents, siblings, friends of the family, project co-ordinators or volunteers. Whoever you are, you must act when you suspect or are informed of possible abuse or potential harm and you have a responsibility to report it.

In the context of this policy vulnerable people include children, young people and vulnerable adults.

- A young person is defined as anyone aged under 18.
- A vulnerable adult is anyone who is aged 18 years or over and who:
 - is living in residential accommodation, such as a care home or a residential special school
 - is living in sheltered housing
 - is receiving domiciliary care in their own home
 - is receiving any form of healthcare
 - is detained in lawful custody (in prison, remand centre, young offender institution, secure training centre or attendance centre, or under the powers of the Immigration and Asylum Act 1999)
 - is under the supervision of the probation services
 - is receiving a welfare service defined as the provision of support, assistance or advice by any person, the purpose of which is to develop an individual's capacity to live independently in accommodation or support their capacity to do so
 - is receiving a service or participating in an activity for people who have particular needs because of their age or who have any form of disability.
 - is an expectant or nursing mother living in residential care, or
 - is receiving direct payments from a local authority or health and social care trust in lieu of social care services.

What is abuse?

Abuse is "the violation of an individual's human and civil rights by any other person or persons"¹. Somebody may abuse or neglect a child by inflicting harm, or by failing to act 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 others (e.g. via the internet. They may be abused by an adult or adults, or another child or children.

Most people cannot imagine that anyone they know could transgress in such a harmful way towards a vulnerable person. This may make them feel uncomfortable if they have suspicions. It is worth remembering that in the case of sexual abuse, the vulnerable person may be targeted by the abuser through a deliberate grooming process involving secrecy testing to ensure that the abuser can trust the vulnerable people "not to tell" and to gain their confidence.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional 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 and 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

¹ Department of Health (2000) No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse.

Safeguarding Policy

normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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 or a child, though it may occur alone.

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 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 is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that could alert you to the fact that abuse has taken place:

- Unexplained bruising or injury particularly in unusual places
- An injury for which the explanation seems to be inconsistent
- Unexplained sudden changes in behaviour (i.e. withdrawing, very quiet, sudden outbursts of temper or emotion)
- Inappropriate sexual awareness or language or engaging in sexually explicit behaviour
- Is prevented from socialising with other children or has difficulty making friends
- Is distrustful of adults particularly those with whom a close relationship would normally be expected, (i.e. parents, teacher, family friend)
- Displays variations in eating patterns (i.e. over eating or loss of appetite)
- Loses weight for no apparent reason (the Child may be trying to make himself/herself less sexually attractive)
- The Child becomes increasingly dirty or unkempt
- Something another Child has said which suggests a Child is being abused
- The Child describes an act or behaviour that appears to be abusive and would not normally be in the child's apprehension

This list is not exhaustive and the presence of one or more of these symptoms is not proof that abuse has taken place, but it should raise concerns.

Guidelines for Promoting Good Practice

Everyone has the right to be safe and to be treated with dignity and respect. You must adhere to the guidelines below when working with vulnerable people:

CWP Safeguarding Policy

Sept 2021

Owner: Steve Egan

Review Date: Aug 2022

Safeguarding Policy

Always be publicly open when working with vulnerable people to avoid situations where a vulnerable person cannot be observed by others.

Do not spend excessive amounts of time alone with vulnerable person away from others.

Treat all people equally with respect and dignity.

Always place the safety and welfare of the vulnerable person as the highest priority.

Behave in an exemplary manner and provide a role model for excellent behaviour.

Respect the needs and wishes of the vulnerable person and do not exert them against their will.

Create a safe and enjoyable situation.

Maintain a written report of any incident or injury together with any subsequent treatment and immediately complete an incident report form.

If you accidentally hurt a vulnerable person and he/she becomes distressed in your presence or misunderstands/misinterprets something you have said or done, report the incident to your line manager and make a brief written note of it.

Practices to be avoided

Do not spend excessive amounts of time alone with vulnerable person away from others.

Never take a child alone on car journeys, no matter how short without first consulting the parents/carers.

Where these situations are unavoidable, they should only occur with the full knowledge and consent of the parent/carer.

Never take a child to your home or other secluded place where they will be alone with you.

Do not engage in rough, physical or sexually provocative games.

Never share a room with a Child.

Never allow or engage in any form of inappropriate touching.

Do not make sexually suggestive remarks to a vulnerable person - even in fun.

Do not allow children to use inappropriate language unchallenged.

Do not allow allegations made by a vulnerable person to go unchallenged, unrecorded or not acted upon.

Never do things of a personal nature for a Child they can do for themselves, unless you have been requested to do so by the parents or do so with the utmost discretion.

Never depart from the premises until you have supervised the safe dispersal of the vulnerable person.

Do not abuse your privileged position of power or trust with children or adults.

Do not resort to bullying tactics, or verbal abuse.

Never cause a child to lose self-esteem by embarrassing, humiliating or undermining the individual.

For policies and procedures specifically relating to E Communication please see the Safeguarding E Safety policy.

Reporting suspected abuse or potential harm

CWP recognises that protecting vulnerable people is everybody's business. Alleged perpetrators could be anybody and could therefore include partner organisations or Local Authority staff, parents, siblings, friends of the family, project co-ordinators or volunteers.

It is not the responsibility of anyone working within CWP to decide whether or not abuse has taken or could take place. It is therefore vital that staff and volunteers raise all cases of suspected abuse in line with the procedures identified in this policy. They should also raise any concerns about anyone they think poses a risk of harming a vulnerable person.

CWP Safeguarding Policy

Sept 2021

Owner: Steve Egan

Review Date: Aug 2022

Safeguarding Policy

If anyone suspects abuse or the threat of harm, they should report it to the Safeguarding Lead as soon as possible even if the suspected perpetrator is someone from a third party organisation.

Dealing with the report of suspected abuse or potential harm

Upon receiving the report of suspected abuse or potential harm, the CEO, in consultation with the Safeguarding Coordinator, will gather further information and details by interviewing the person making the report directly.

The CEO will then devise an appropriate plan of action. The exact nature of the action taken will be determined by the individual circumstances, but it will involve the reporting of the incident to the appropriate organisation

Any report to outside organisation's such as Social Services will include:

- The person's name and age
- Where they live and who with
- Known organisation's providing them with help or services
- Why the person reporting abuse or potential harm is concerned
- Details of the person(s) who may be abusing or a threat to the vulnerable people

Allegations against a member of staff or volunteer will be reported to LADO and appropriate action will be taken in consultation with LADO.

Any allegation against the CEO should be reported to the Chair of Trustees as well as LADO.

In the event of a report of suspected third party abuse, the CEO should immediately inform the Safeguarding Lead. In consultation, an action plan should be prepared. It would be limited to what CWP can do under these circumstances, but as first line of action, it should be reported to the third party organisation without any delay.

If a disclosure of abuse is made or a concern is raised by a service user, care should be taken to explain to them the procedure that will be followed and they should be told that it may not be possible for CWP to maintain confidentiality. They should also be informed that they may be asked to give evidence by external authorities such as Social Workers and the Police. There may be circumstances where confidentiality cannot be guaranteed.

In the event of an allegation being made CWP will make every effort to maintain confidentiality and guard against unwanted publicity. Parents and carers will be made aware that under s141F of the Education Act 2011, there is a prohibition on reporting or publishing allegations, this includes via social media e.g. Facebook, Twitter etc and if breached this could lead to prosecution. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be advised to seek legal advice.

Finally, it should be acknowledged here that taking appropriate action is never easy and the discovery that a member of staff or volunteer is or may be abusing a vulnerable person will raise concerns and emotional feelings among other colleagues. These emotions may evolve around feelings of:

Doubt: Is it true?

Confusion: What will happen? What action should be taken? What will be the effect?

Guilt: Should I have known? Should I have said something? Did I miss something? Did I have any suspicions?

Fear: Will others or I be suspected?

Concerns: What can I do to support all those people who may need support? How will it affect further relationships or contact with children? Is there a system in place to expose future situations?

There is clearly a need to have support mechanisms for all those involved in or surrounding the issue, including those making the allegation, those who may be being abused and those against whom the allegation/s are made. CWP is primarily concerned with the wellbeing and safety of all its staff, volunteers and service users and will consult all partners and LADO as appropriate.

CWP Safeguarding Policy

Sept 2021

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Review Date: Aug 2022

Safeguarding Policy

Code of Good Practice for Safeguarding Vulnerable People

The CEO should also ensure that discussions take place with staff, trainees or volunteers about Safeguarding. Staff, trainees and volunteers who fail to abide by the code of practice may be subject to disciplinary action being taken against them under the appropriate disciplinary procedure.

Records and Communication

Information sharing and recording of information is essential and will be in line with all CWP policies relating to confidentiality, data protection and human rights.

Accurate and legible records are important. They must be dated, timed and signed and fully reflect the situation at the time. All action taken and names of those contacted must likewise be fully recorded. When concerns about the deliberate harm of a vulnerable person have been raised the Issue Log and Incident Report Form should be used.

All files will be password protected or in hard copy stored under lock and key in a central place and only those who are DSL trained will have open access to them. The DSL/backup DSL will share information on a need-to-know basis.

Prevent

Disclosures regarding students and staff who display or espouse values contrary to the accepted British values of the rule of law, democracy, individual liberty and respect and tolerance, should follow the same process of recording and reporting to the designated person.

Extremism is defined as: “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.”

Radicalisation

Refers to the process by which a person comes to support terrorism and forms of extremism.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. CWP recognises that protection from extremism & radicalisation is a vital element of safeguarding. ALL staff and volunteers will have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty'

Prevent Safeguarding Lead – Laura Webster • Prevent Trustee Lead – Holly Clare (serving Police officer)

ALL staff and volunteers will have a general understanding of how to identify a child who may be at risk of radicalisation. All staff will undergo prevent training annually

ALL staff and volunteers will use professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

Female Genital Mutilation:

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Indicators:

FGM: multi agency practice guidelines:

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

Pages 16 -17 - indicators

Pages 42 - the role of schools and colleges.

Also s5.8 <http://panlancashirescb.proceduresonline.com/index.htm>

CWP Safeguarding Policy

Sept 2021

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Safeguarding Policy

In instances where the designated person is informed of an individual's or group's potential for extremism and radicalisation, the designated person will refer the concern and information to:

(Non-Lancashire) Colleagues in other areas of the country should e-mail: WRAP@homeoffice.x.gsi.gov.uk for details of training available in their area

Local (Lancashire-region schools) contacts can be found using the Lancashire 'Contact Us' guidance included above which includes a Concern Form template

Lancashire Constabulary 'Prevent Team' 01772 413029

The Police non-emergency number 101

Crime stoppers 0800 555 111

Anti-Terrorism Hotline 0800 789 321

Support within the Local Authority to offer advice & support

Steve Egan	CEO	01772 555123
Tim Booth	LADO	01772 536694
Laura Webster	CWP Designated Safeguarding Lead	01772 555123
Lynn Brewer	Legal Services	01772 530569
CAF Team Lancashire	CAF Coordinator/Early Intervention Officer	01772 535636 caf@lancashire.gov.uk

¹ Guidance for schools on the management and support of young people who display problematic or sexually harmful behaviour, for example is available via mary.aurens@lancashire.gov.uk

The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant, as outlined in this guidance. It is recognised that for most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity (as defined in KCSIE 2018)

END OF POLICY

This Policy is reviewed annually.

Safeguarding Policy

Annex 1

GUIDELINES ON IMMEDIATE ACTION TO BE TAKEN FOLLOWING REPORT OF ABUSE OR POTENTIAL HARM

Abuse or potential harm may become apparent in a number of ways; through observation, a vulnerable person may tell you, a third party may have reported an incident, or you may have a strong suspicion. If an allegation brought to your attention:

STEP 1 - LISTEN & REASSURE**DO**

Stay calm - do not rush into inappropriate action.

Reassure the person - that they are not to blame and confirm that you know how difficult it must be to confide.

Listen - to what they say and show that you take them seriously.

Keep questions to a minimum - use open ended questions i.e. those where more than a yes/no response is required. The law is very strict and abuse cases have been dismissed if it appears that the person has been led or words and ideas have been suggested.

Ensure that you clearly understand what they have said so that you can pass it on to the appropriate agencies.

Report it to the Safeguarding coordinator - ensuring that you communicate all the information accurately. Update Safeguarding Issue Log

DO NOT

Panic.

Make promises you can't keep by -

explain that you may have to tell other people in order to stop what is happening whilst maintaining maximum possible confidentiality.

Make the person repeat the story unnecessarily.

Delay.

STEP 2 – RECORD

If the allegation is **ABUSE OR POTENTIAL HARM**, the following process should be followed:

- make a full report of any allegations or suspicions on paper
- give the report and incident record form to the Safeguarding Lead unless they are involved in the complaint who will then involve the Local Authority Social Work Department or Police immediately if necessary and make a record of this
- confidentiality must be maintained

If the allegation relates to **POOR PRACTICE**, the following process should be followed:

- make a record of the allegations
- Inform the CEO so that an investigation can be carried out as necessary

STEP 3 - INVOLVE THE APPROPRIATE PEOPLE

Once you have completed your report you must ensure that the Safeguarding Lead has been informed so a decision can be made as to the most appropriate action. This person must forward the report to the CEO indicating whether further action is required, thus allowing the CEO to take any disciplinary action. If you are unhappy with the Safeguarding Leads handling of the incident or the allegations are made specifically against this individual, you should contact the CEO immediately and make a record of this.

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