

# Prospect Group of Companies

## Policy No: 9

### **Title: Safeguarding Vulnerable Groups Policy and Procedures**

**DEFINITION: 'The Company' referred to herein is defined as The Prospect Group of Companies which incorporates the following:**

**Prospect Training Services (Gloucester) Limited**



**NCLP – Nationwide Community Learning Partnership**



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## 1. Introduction

- The Company has a duty to ensure that vulnerable people in its care are protected from actual or potential abuse. The purpose of this policy is to provide clear instructions to people working within the organisation about handling incidents of suspected or actual abuse.
- This policy has been written in conjunction with the South West Child Protection procedures and the Gloucestershire Community Adult Care Directorate Social Services Adults at Risk Procedures
- For the purposes of this document the term's "children" and "young people" are interchangeable. Specific pieces of legislation may define these terms differently; however The Company has adopted the definition of "child" as outlined by section 105 Children in the Children Act 1989 and the United Nations Convention on the Rights of the Child, as a person under the age of 18 years old.
- The Company staff members also have contact with adults either as clients of its services or as members of family units. Some of these adults may from time to time also be subject to actions or behaviour by others either in the family or the community that can cause them harm of some kind. These individuals can be defined as vulnerable adults.
- The Company also believes that vulnerable adults have both a legal and ethical right to protection from abuse by staff and agencies to which they have been referred.
- For the purposes of this policy, 'vulnerable adult' should be taken to mean a person over 18 whom: '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 themselves, or unable to protect themselves against *significant* harm or exploitation'.
- For the purposes of this document the term "worker" applies to anyone engaged by the organisation to work with children and young people, whether on a paid or voluntary basis.
- For the purposes of this document the terms *vulnerable person*, *vulnerable people*, *vulnerable groups* and *vulnerable clients* should be taken to indicate children, young people and vulnerable adults unless otherwise listed.
- For the purposes of this document the term 'local authority' should be taken to indicate either the Adult Protection Team, Police, Children and young Person's Directorate, GSCB or other organisation dealing with safeguarding vulnerable groups and will be dependent on the age and circumstances of the vulnerable person/people in question.

## 2. Policy

- The Company believes that it is the right of all vulnerable people to live in a caring and safe environment. We are committed to protecting vulnerable groups, using or linked to our services, from abuse. We are committed to ensuring that the occurrence of abuse is prevented, and where it does occur; we are committed to ensuring it is not allowed to continue.
- The Company is committed to working within the framework of childcare legislation, regulations, Adults at Risk Procedures and Safeguarding Vulnerable Groups legislation.
- The Company will uphold this Policy by:
  - Ensuring that all workers are conversant with the The Company Safeguarding Vulnerable Groups Policy and Procedures and understand the mandatory nature of them; The Company mandatory core training programme will ensure that all workers are able to act responsibly when they encounter actual or suspected abuse.
  - Ensuring that vulnerable people receiving The Company's services have clear access to named individuals within the organisation at Management level.
  - Ensuring an accessible Complaints and Reporting Procedure
  - The Company will commit itself fully to the promotion of vulnerable groups welfare and their protection from significant harm, in partnership with the local authority under

safeguarding vulnerable groups policies, Adult Protection/GSCB Procedures and the Every Child Matters / Change for Children agenda

- Be healthy
- Stay safe
- Enjoy and achieve
- Make a positive contribution
- Achieve economic well-being

### **3. Policy Principles**

- All vulnerable people have a right to protection from abuse of all types and to expect that adults in positions of responsibility will do everything in their power to foster these rights.
- All allegations of abuse will be taken seriously and understood from the viewpoint of the victim.
- Through our work we seek to empower vulnerable groups by valuing their opinions, ensuring that they are aware of the choices that they can make in any given situation, and by responding to their rights to be involved in decisions about their future. This principle will always be exercised within a framework of protecting a vulnerable person from harm.
- Because of the nature of our work it is important to involve parents/guardians/carers where possible at every stage in safeguarding vulnerable group work. However, it must be borne in mind that it is welfare of the vulnerable person that is paramount. Where the vulnerable person is our primary client it is important that there is trust between them and The Company, however it must be clear that the interests of the vulnerable person must take precedence if there are any protection issues. Where the vulnerable person is the primary client their interests must be considered separately from the interests of the parents/guardians/carers. The desire to work alongside the parents/guardians/carers must never be allowed to impede the vulnerable person's protection process.
- The Company will work alongside the local authority and other professionals, on a multidisciplinary basis to promote good practice and meet the objective of effectively protecting vulnerable groups.
- In all our work The Company will take into consideration the sensitive issues that may arise when working with people of differing race, religion, language, culture, gender, physical and mental abilities.
- All workers should remember that duties to protect vulnerable groups apply to all children, young people and vulnerable adults, not just those with whom we have a direct relationship. This should be remembered when supporting service users. We may become aware of protection issues for vulnerable people we have never met, e.g. a service user's younger or older sibling, parent or grand parent

### **4. Guiding Principles for Working with Vulnerable Groups**

#### **Definition of Vulnerable People adopted by The Company**

A young person who has not yet reached their 18<sup>th</sup> birthday or a person aged 18 or over 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 protect themselves against significant harm or exploitation.

#### **In working with Vulnerable People The Company's aim is to:**

- Promote their general welfare;

- Recognise their rights as individuals and treat them with dignity and respect;
- Consistently apply fair and objective methods of selecting staff;
- Plan activities involving children, young people and vulnerable adults with care to minimise risks to their health and safety;
- Raise awareness of the dangers to which children, young people and vulnerable adults may be susceptible;
- Develop appropriate procedures for responding to accidents, incidents and alleged or suspected harm.

## **Code of Conduct**

Some actions, no matter how well intentioned, may be misinterpreted and leave all parties vulnerable. The following is a quick reference guide to appropriate behaviour when working with vulnerable people. All staff **should**:

- Remember they are a role model and provide an example for those they work with to follow;
- Bear in mind that some actions, no matter how well-intentioned, may be easily misinterpreted and so leave all parties vulnerable;
- Be alert to any potential harm or inappropriate behaviour by vulnerable people;
- Ensure they have adequate training if supervising sports or games (e.g. football);
- Respect individuals' rights to privacy;
- Provide access for vulnerable people to discuss any concerns they may have;
- Speak to the appropriate person if they have concerns about an individual's safety.

### **Staff should not:**

- Be left alone for substantial periods of time with vulnerable people. Where one-to-one work is necessary they should inform another staff member where they are going, with whom and for how long;
- Permit abusive behaviour by others or engage in it themselves (e.g. ridiculing and bullying);
- Show favoritism to, or become too closely associated with an individual. Nor should they get drawn into inappropriate attention-seeking behaviour (e.g. crushes);
- Allow or engage in suggestive remarks, gestures or touching of a kind, which could be misunderstood;
- Jump to conclusions about others without checking facts;
- Hesitate to share concerns on any of these matters with the appropriate person.

## **5. Raising Awareness of Dangers**

**Guiding principle: raise awareness of the dangers to which vulnerable people are susceptible.**

### **Abuse - Types**

Abuse is generally described under the following headings and is usually referred to in the context of children. For the purposes of this policy the following definitions are also applicable to abuse of young people or vulnerable adults:

#### **Neglect**

Neglect can be defined as a situation in which the vulnerable person suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from others and medical care. The threshold of significant harm is reached when the person's needs are neglected to the extent that their well-being and/or development are severely affected.

### **Emotional Abuse**

Emotional abuse occurs when a vulnerable persons need for affection, approval, consistency and security are not met. Examples of emotional abuse include:

- The imposition of negative attributes on a vulnerable person, expressed by persistent criticism, sarcasm, hostility or blaming;
- Emotional unavailability by the vulnerable persons parent/carer;
- Unrealistic and/or inappropriate expectations of the vulnerable person;
- Failure to show interest in, or provide age-appropriate opportunities for the vulnerable persons cognitive and emotional development;
- Unreasonable or over harsh disciplinary measures;
- Exposure to domestic violence
- Exposure to coercive control where one person who is personally connected to another, repeatedly behaves in a way which makes them feel **controlled**, dependent, isolated or scared.

### **Physical Abuse**

Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a vulnerable person. Examples of physical injury include:

- Shaking, smacking/striking, with or without a weapon, and burning including scalding or friction burns;
- Use of excessive force in handling.

### **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.

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines (<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>), and Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools and colleges.

Section 5B of the Female Genital Mutilation Act (2003) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same

definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty commenced in October 2015; tutors **must** report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the tutor has a good reason not to, they should still consider and discuss any such case with the Company’s Designated Safeguarding Lead and involve children’s social care as appropriate.

## **Child Sexual Exploitation**

**Introduction** (extract from GSCB guidelines). See [www.gscb.gov.uk/procedures](http://www.gscb.gov.uk/procedures) for full process and CSE Screening Tool.

### **Statement of intent**

- Sexual exploitation of children is child abuse and is unacceptable. Tackling child sexual exploitation is one of the key priorities for the Gloucestershire Safeguarding Children’s Board. Such exploitation can have serious long term impact on every aspect of the child or young person’s life, as well as the lives of their families
  - .
- It is our collective multi-agency responsibility to identify those children and young people at risk of exploitation and our joint responsibility to protect them and safeguard them from further risk of harm. We shall also prevent children becoming victims of this form of abuse and reassure our communities that we can perform our duties effectively.
- It is our clear intention to improve the lives of children living in Gloucestershire. We will do so by ensuring children and young people understand the risks of being exploited enabling them to cease contact with the perpetrators of this abuse.

### **Definition and scope**

- The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people receive „something” (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of engaging in sexual activities. This can occur through the use of technology without the child’s immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.
- In recognising child sexual exploitation as child abuse this protocol identifies that children must be protected, and enabled to protect themselves, in all aspects of their lives and relationships. The sexual exploitation of children and young people crosses boundaries of culture, community groups, disability, social class, and gender

### **Sexual Abuse**

Sexual abuse occurs when a vulnerable person is used by another person for his or her gratification or sexual arousal or for that of others. Examples of sexual abuse include:

- Exposure of the sexual organs or any sexual act intentionally performed in the presence of a vulnerable person;
- Intentional touching or molesting of the body of a vulnerable person whether by a person or object for the purpose of sexual arousal or gratification;

- Sexual intercourse with a child under 16 years old
- An adult/professional in a position of trust, or a family member having intercourse with a vulnerable adult of any age or child 16 to 18 years old ;
- Sexual exploitation of a vulnerable person
- This may also include non-contact activities, such as looking at, or in the production of sexual images, watching sexual activities, encouraging vulnerable people to behave in sexually inappropriate ways, or grooming a vulnerable person in preparation for abuse (including via the internet)
- Guidance for staff working with young people involved in under-aged sexual activity. See [www.gscb.org.uk/procedures](http://www.gscb.org.uk/procedures)

### **Financial Abuse**

Financial Abuse is another name for stealing or defrauding someone of goods and/or property. It is always a crime but is not always prosecuted. Sometime the issue is straightforward, for example a care worker stealing from an older person's purse, but at other times it is more difficult to address. This is because very often the perpetrator can be someone's relative, or age/disability prejudice means that people assume it is not happening or that the vulnerable person is confused.

Financial Abuse involves:

- Theft
- Fraud
- Exploitation
- Pressure in connection with wills, property, financial transactions, misuse or misappropriation of property, possessions or benefits
- Deny money for food, transport, clothes etc. to attempt to isolate and control a vulnerable person

### **Domestic Abuse**

Domestic Abuse is defined as incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. It is very common.

Domestic abuse can include, but is not limited to, the following:

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse
- Physical abuse
- Sexual abuse
- Financial abuse
- Harassment
- Stalking
- Online or digital abuse

### **Bullying**

Bullying can be defined as repeated aggression - be it verbal, psychological or physical which is conducted by an individual or group against others.



Examples of bullying include:

- Teasing;
- Taunting;
- Threatening;
- Hitting;
- Extortion;
- Segregation, including malicious ignoring and non-involvement to belittle and undermine

Bullying may take place in any setting - in training, the home or in a work placement. Bullying can also take place online this is known as 'Cyber-Bullying' The more extreme forms of bullying would be regarded as physical or emotional abuse.

### **Harassment**

Harassment covers a wide range of offensive behaviour. It is commonly understood as behaviour intended to disturb or upset. In the legal sense, it is behaviour which is found threatening or disturbing. Sexual harassment refers to persistent and unwanted sexual advances, typically in the workplace, where the consequences of refusing are potentially very disadvantageous to the victim.

Harassment can include anti-social behaviour targeted at vulnerable people in the community by neighbors and others because they are different and this links closely with discriminatory abuse

### **Discriminatory abuse**

Discriminatory abuse is when someone picks on or treats someone unfairly because something about them is different, for example it may be:

- Their clothes
- Their weight
- Their race or skin color
- Their religion or culture
- Being a man or a woman
- Being a gay man or a lesbian woman
- Their age
- Their health or disability

### **Who Can Abuse**

Abuse may be carried out by strangers. It is much more common however that the abuser is someone known to the person being abused, whether a parent, sibling, other relative, family friend, neighbour or adult professional providing support. Not only adults can harm. Children and young people can also suffer abuse from their peers.

Sometimes the abuser may be an adult who holds a position of authority over a young person. There is no certain way of identifying a would-be abuser, they can be people of any background and do not appear different from the rest of society.

### **Recognising Abuse**

#### **Possible Indicators of Child/Vulnerable person Abuse**

##### **Physical**

- Frequent bruising, fractures, cuts, burns and other injuries;
- Torn clothing;
- Signs of neglect e.g. dirty, underfed;

- Constant hunger;
- Failure to thrive;
- Genital injuries or soreness;
- Sexually transmitted diseases;
- Pregnancy;

## **Emotional**

- Unreasonable mood and/or behaviour changes;
- Aggression, withdrawal or an 'I don't care attitude';
- Lack of attachment;
- Depression or suicide attempts;
- Persistent nightmares, disturbed sleep, bedwetting, reluctance to go to bed;
- Fear of a parent, family member or friend;
- Fear of the dark;
- Panic attacks;

## **Behavioural**

### *Sexual*

- Over affectionate or inappropriate sexual behaviour or knowledge given the child's/vulnerable person's age often demonstrated in language, play or drawings;
- Fondling or exposure of genital areas, open masturbation;
- Sexually aggressive behaviour with others;
- Hints about sexual activity;
- Unusual reluctance to join in normal activities which involve undressing, e.g. games/swimming;
- Overly compliant and submissive;
- Strong dislike of physical contact;
- Exploitation – resulting in the vulnerable person being forced to give sexual favours in return for gifts or money.

## **Changes in normal behaviour for the person in question**

- Unwillingness to participate in certain activities or go to particular places (that once may have been liked) e.g. training establishment, youth group, and swimming pool;
- Running away from home or avoiding training;
- Separation anxiety;
- Aggression;
- Self harm;
- Bed wetting/soiling;

- Wetting/Soiling of clothes;
- Isolation;
- Tiredness and poor concentration;
- Unexplained display of wealth of gifts (bribes) or a constant shortage of money and loss of good equipment/clothes/shoes (taken by bullies).

### **Illness**

- Eating disorders such as overeating or anorexia;
- Skin disorders;
- Obsessive washing;
- Psychosomatic disorders.

### **Some signs are more indicative of abuse than others. These include:**

- Disclosure of abuse and neglect by a child or young person;
- Age-inappropriate or abnormal sexual play or knowledge;
- Specific injuries or patterns of injuries;
- Running away from home or a care situation;
- Attempted suicide;
- Under-age pregnancy or sexually transmitted disease;
- In children sudden soiling of clothing and the bed where this is not usual behavior

## **6. Disclosure of Concern – See Annexe A for full Reporting Process**

**It is important to stress that no one indicator should be seen as a conclusive indication of abuse; it may indeed indicate conditions other than child abuse. A cluster or pattern of signs is more likely to be indicative of abuse.**

### **Informing**

By issuing this policy and through its mandatory core training programme, The Company is keen to ensure (without creating unnecessary anxiety) that all relevant employees:

- Know the types of harm to which children, young people and vulnerable adults are susceptible;
- Are alert to behaviour, which suggests something may be wrong;
- Are able to talk to someone if they become aware of anything, which causes them to feel uncomfortable;
- Know how to deal with alleged or suspected harm.

### **Disclosure**

A disclosure is when a vulnerable person tells someone that they have been or are being harmed or abused in some way. This may be physical, sexual, emotional abuse, neglect or bullying

- Believe the vulnerable person unless proven otherwise by a competent authority – always assume the vulnerable person is being truthful.
- Remain calm and do not ask leading questions.

- Take the disclosure seriously, never underestimate the situation
- Do not minimise the incident.
- Tell the vulnerable person he/she has done the right thing in telling you. **Never** promise to keep it a secret.
- Reassure the vulnerable person no blame or guilt is his or hers. Vulnerable groups of sufficient age and understanding often have a clear perception of what needs to be done to ensure their safety and wellbeing. Most vulnerable people feel loyalty towards those who care for them and have difficulty saying anything against them. Some may fear reprisals and will need a great deal of reassurance.
- Write down exactly what was said to you using the vulnerable person's **OWN** words immediately after disclosure. Remember to date and to sign the account, which should be given to the designated manager as soon as possible after disclosure.
- Tell the vulnerable person what you will do with the information. vulnerable people need to understand the extent and nature of their involvement and should be helped to understand the protection process.
- **DO NOT** deal with the matter alone. Report it to your line manager or company's designated manager, it is vital you tell the vulnerable person that you **must** do this.
- Children and young people are entitled to the same duty of confidentiality as adults, provided that, in the case of those under 16 years of age, they have the ability to understand the choices and their consequences. Personal information about children and young people held by professionals is subject to a legal duty of confidence and should not normally be disclosed without consent of the subject. However, the law permits the disclosure of confidential information necessary to safeguard a child or vulnerable adult in the public interest; that is; the public interest in safeguarding vulnerable groups may override the public interest in maintaining confidentiality.
- Seek support for yourself, advice and information on support services can be accessed via the safeguarding manager.

### **A Vulnerable Person under Immediate Threat**

In a situation where a vulnerable person is at immediate risk the member of staff should:

- Respond to secure the safety of the vulnerable person without placing themselves or others in danger
- Discuss the situation with their manager or other designated member of staff. If unavailable direct consultation with the appropriate local authority should take place and any steps taken should be reported to the line manager as soon as possible. (all local authority contact details are listed at the end of this document)
- Record all details of the incident and what action they have taken.
- If the situation is immediately dangerous, and there is concern about the immediate safety of a vulnerable person, referral should be made to the police in the first instance.
- Where a vulnerable person needs immediate medical assistance this overrides all other considerations and it must be sought immediately. In such situations doctors are able to provide emergency treatment to the vulnerable person without parental, guardian or carer consent. The worker concerned must tell the Doctor or medical staff if they have concerns over the nature of the injuries and vulnerable person's ongoing welfare. The Company staff should refrain from diagnosing abuse unless the vulnerable person has made a disclosure indicating such.

### **A child, young person or vulnerable adult for whom there is concern**

- All staff have a responsibility to consult with their line manager or another designated

manager when they have concerns about the safety of a vulnerable person. It is better to share a concern which may prove groundless than to wait for certainty, which may result in irreparable damage to the child, young person or vulnerable adult.

- Any worker who believes that they have seen possible evidence of abuse, who has concerns that a vulnerable person may be at risk of significant harm, or to whom a vulnerable person makes an allegation of abuse or possible abuse, must consult with their line manager, or another designated manager immediately, and as a maximum within 24 hours of the concern or allegation coming to light. If this is not possible then the worker should consult directly with the appropriate local authority.
- Where the concern raises questions about the immediate safety of the vulnerable person, consultation with the relevant manager, or directly with the appropriate local authority if a manager is unavailable, should be immediate
- Following consultation with the designated manager a decision will be reached on how to proceed. This will include deciding whether, when and how any concerns will be discussed with the vulnerable person or parent, guardian or carer and whether a referral to the appropriate statutory services is necessary. Faced with possible evidence of abuse or the risk of significant harm the relevant manager must take responsibility for ensuring that the appropriate person in the local statutory services is contacted and that the information is passed to them, giving the full context of the incident, any previous interventions, and any relevant information regarding the vulnerable persons history.
- Where a service user has disclosed information about abuse or the risk of significant harm to a vulnerable person, the The Company manager/worker should ensure, as far as they are able to, that the “discloser” is kept informed about what will happen next. This will help to re-assure them about what to expect.
- Where there is already active involvement of the local authority in a case, and a worker has concerns about the welfare of a vulnerable person or where a vulnerable person makes an allegation of abuse or possible abuse then a referral to the Local Authority should still be made including details of the active social worker and any discussions that may have taken place included in the form.
- Confidentiality is not absolute secrecy The Company operates a limited confidentiality policy in regards to Safeguarding Vulnerable Groups. All vulnerable people receiving services from The Company will be informed of its limited confidentiality policy and the exceptions where a vulnerable person’s safety is at risk. No worker should ever give a guarantee of confidentiality to a vulnerable person wishing to disclose abuse. The worker who receives such information should handle the situation sensitively and explain it is necessary to involve other agencies to protect the vulnerable person. Although it is best avoided, the situation may arise where information has to be passed on without the vulnerable person’s agreement.
- When an allegation involves another child the designated manager should contact the local Authority within the set timescales within this policy. Advice should then be followed and recorded.
- All contact with the local authority must be recorded. Referrals of possible abuse to the local authority via the phone must be confirmed in writing within 24 hours. Confirmation should include full details of evidence, action taken, and designations of people contacted. Use of the Social Care Service Request Form is required.

## Concern

Inappropriate or unacceptable behaviour or communication, favouritism and negligence are examples of what may constitute a concern and must be reported in line with the SVG Incident reporting process (see annexe A for full process).

## **Confession**

A confession occurs when a child, young person or adult tells someone that they have been involved in the abuse of a vulnerable person. Confessions must be reported to one of the designated managers unless there is immediate concern for the safety of the victim in such cases the police must be informed straight away

## **Allegation**

An allegation occurs when someone reports specific unacceptable behaviour where a vulnerable person has been harmed or abused in some way. Allegations must be reported to one of the designated managers listed in D5

## **Evidence**

- There may be some cases where a vulnerable person presents on a single occasion with injuries that immediately arouse suspicion of abuse. In all such cases these injuries should be treated as potential evidence of abuse and should result in the case being reported to the Children's helpdesk as a referral for service.
- Examples of possible evidence of abuse may include physical and behavioural signs and signals, comments made vulnerable person, or noticing a pattern from records. Reference should be made to the local authority's guidance on the "signs and signals" of possible abuse and risk factors as listed in the The Company's Guiding Principles for Working with Vulnerable Groups.

## **Abusers**

- The perpetrator of abuse can be anyone who is in a position to exert power over a child, young person or vulnerable adult, including a natural parent, step-parent, relative, foster carer, a partner, respite carer, adoptive parent and teacher, member of staff, sibling, peer, friend or neighbour.
- Vulnerable groups are most often abused by those who are close to them, or who have direct care of them, that is, parents and other family members, or care givers. They may also be abused by other children, by strangers, or by professionals who may do so in the guise of 'helping'.
- When a vulnerable person has been abused the role of others in the household must be considered. Some parents/carers will have been totally unaware of the abuse and may need support to help come to terms with it. Others may have co-operated with the abuse or have been coerced into accepting it.
- All workers should be alert to any signs that a colleague, both employees of The Company and employees of other organisations, is behaving inappropriately in relation to a child or vulnerable person. Any such suspicion should be discussed with a senior member of staff, who will consider it in light of these procedures. The senior member of staff will decide where applicable, to follow our internal procedures or inform the agency to whom the colleague is attached.
- All workers will be aware that to enter into a social relationship with any service user outside the boundaries of our service specifications is a breach of The Company's Code of Conduct, covered in The Company policy on 'Relationships with Service Users' and will be considered as gross misconduct.
- Any inappropriate relationship, sexual or otherwise, with a service user is considered gross misconduct under our policies and will instigate the allegations management procedure.

## **Please remember:**

- The only professional qualified to diagnose whether a physical injury is the result of abuse is a professionally trained medical practitioner. The Group of Companies as an

organisation, its workers and partner agencies should report their concerns but avoid diagnosing incidents as Abuse.

- It is your responsibility to report concerns, NOT to decide whether it is or is not abuse.
- The Company advocates a 'No Secrets' approach to the protection of vulnerable groups. If you are unsure about your suspicions discuss them with your line manager anyway. It is better to report and be wrong than to stay quiet and have been right.
- Never promise to keep quiet about your concerns to a victim of abuse or the perpetrator of abuse

## **7. Preventing Radicalisation**

- The Company has a wider safeguarding duty to prevent children and vulnerable adults from the risk of radicalisation and extremism. The Company has developed a PREVENT strategy detailed below to support the Prevention of Extremism and Radicalisation [The Prevent Duty].
- Any member of staff or learner at The Company who have any concerns regarding the issues identified within this guidance policy should report those concerns immediately and no later than the end of the working day to the Designated Senior Person

### **Designated Senior Person for Safeguarding – Kate Whereat [Safeguarding Manager (Prevent & CIC Lead)]**

#### **Introduction**

The current threat from Terrorism and Extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children, young people and adults. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process (see below).

*Radicalisation* is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

*Extremism* is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of 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 (HM Government Prevent Strategy, 2011).

#### **Equality, Diversity and Community Cohesion**

The company aims to guide our staff and learners to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take extremely seriously our key role in preparing all our learners for life in modern Britain. We aim to encourage working towards a society with a common vision and sense of belonging by all. Community: a society in which the diversity of people's backgrounds and circumstances is appreciated and valued; a society in which similar life opportunities are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in education and in the wider community.

#### **National Guidance and Strategies**

PREVENT is a key part of CONTEST, the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people

away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation. The PREVENT strategy objectives are:

- *Ideology*: respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- *Individuals*: prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- *Institutions*: work with sectors and institutions where there are risks of radicalisation which we need to address.

All staff should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately.

### **Vulnerability/Risk Indicators**

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable learners experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a learner or their family may be vulnerable or involved with extremism:

- *Vulnerability Identity crisis*: Distance from cultural/religious heritage and uncomfortable with their place in the society around them.
- *Personal crisis*: Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
- *Personal circumstances*: Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- *Unmet aspirations*: Perceptions of injustice; feeling of failure; rejection of civic life.
- *Criminality*: Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.
- *Access to extremist influences, as follows*:
  - Reason to believe that the young person associates with those known to be involved in extremism.
  - Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence.
  - Use of closed network groups via electronic media for the purpose of extremist activity experiences, behaviours and influences.
  - Experience of peer, social, family or faith group rejection.
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour.
- Verbal or written support of terrorist attacks.
- First-hand experience of racial or religious hate crime.
- Extended periods of travel to international locations known to be associated with extremism.
- Evidence of fraudulent identity/use of documents to support this.
- Experience of disadvantage, discrimination or social exclusion.
- History of criminal activity.
- Pending a decision on their immigration/national status.



More critical risk factors include:

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance/behaviour.

## **Referral and Intervention Process - See Annexe C for full reporting process**

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the person supports terrorism and/or extremism, must be reported to the named designated safeguarding professional immediately and no later than the end of the working day.

Where a person is thought to be in need or at risk of significant harm, and/or where investigations need to be carried out (even though parental consent may be withheld), a referral to the relevant Social Care agency should be made in line with the company Child Protection Policy. However, it should be recognised that concerns of this nature, in relation to violent extremism, are most likely to require a police investigation (as part of the Channel process).

As part of the referral process, the designated professional will also raise an electronic referral to reported to the Local Police Prevent team using 101 (Ext 2802) and ask for the Counter Terrorist Security Advisor or via the Prevent Coordinator for their region (South West) this is currently Salam Katbi [Salam.Katbi@bristol.gcsx.gov.uk](mailto:Salam.Katbi@bristol.gcsx.gov.uk)

Local Police contacts:

[101@gloucestershire.police.uk](mailto:101@gloucestershire.police.uk)

[Adam.large@gloucestershire.police.uk](mailto:Adam.large@gloucestershire.police.uk)

[Matthew.morris@gloucestershire.police.uk](mailto:Matthew.morris@gloucestershire.police.uk)

## **Channel referral process**

Some concerns which are identified may have a security dimension to them, for this reason, it is important that liaison with the police forms an early part of all investigations. Gloucestershire Police will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the person.

## **Training**

The company will ensure that the designated senior person is suitably competent for this role and that all employees who work with learners receive PREVENT and CHANNEL awareness training to enable early identification of radicalisation and effective referral.

## **Speaker and Events – See Annexe B for full Risk Assessment Process**

The company will ensure that any external speakers engaged by The Company are suitably vetted prior to speaking and monitored throughout their engagement with PTS employees and learners.

All events will be risk assessed for the potential of radicalisation risk prior to the event and monitored throughout.

### **Access to all Centres**

The company will ensure that all staff wear photographic ID Badges at all times. All visitors must be signed in and out of all sites and be asked to wear a visitor's badge, which must be visible at all times. All staff are responsible for reporting any persons who are not wearing a badge immediately.

## **8. Working in partnership with Local Authorities – See Annexe E for Full list of contacts from the local authority**

- The Company will have a **named contact person** who is responsible for developing a formal link between the local authority and the company, the aim of which is to promote a clear understanding of accountability and procedures.
- Current named contacts:
  - **Kate Whereat** – Safeguarding Manager (Prevent & CIC Lead)
  - **Sally Cope** – Tutor/Safeguarding Officer
  - **Jane Trehearne** - Tutor/Safeguarding Officer
  - **Russell Ingmire** - Employment Support Officer/Safeguarding Officer
  - **Christina Reddish** – Tutor/Safeguarding Officer
  - **Jim Duffin** – H&S Officer/Safeguarding Officer
- A Safeguarding Vulnerable Groups Statement for Service Users has been developed.

## **9. Training**

- Safeguarding Vulnerable Groups protection issues must form a part of induction, training, supervision and appraisal process.
- Safeguarding Vulnerable Groups training will be available to all Company staff.
- Designated staff within the organisation will undergo relevant safeguarding and child protection training
- Designated staff within the organisation will be responsible for the cascading of information and training to the workers within The Company. All staff will be given underpinning knowledge on safeguarding vulnerable groups and the mechanics of the The Company's Safeguarding Vulnerable Groups Policy and Procedures. This will be refreshed every 12 to 15 months
- All clients accessing The Company's services will have access to Safeguarding Vulnerable Groups awareness information.

## **10. Record Keeping**

- Any records must be kept accurate and factual. Records relating to suspected, possible or actual abuse must be signed and dated by the worker making the entry. When recording information workers must be sensitive to the fact it may be shared with parent/s or carers.
- Where a Company worker has concerns about possible significant harm to a child, young person or vulnerable adult, the concerns must be clearly recorded using the Safeguarding Vulnerable Groups Incident Report Form and discussed with the designated safeguarding officer, or if they are not available with the named deputy in. The incident report form should be forwarded to the designated officer who will record the incident.

- The only professional qualified to diagnose whether a physical injury is the result of abuse is a professionally trained medical practitioner. The Company as an organisation and its workers should report their concerns but avoid diagnosing incidents as Abuse.
- **It is the responsibility of professionals to report concerns, NOT to decide whether it is or is not abuse.**
- The Company is committed to openness in our work with Service Users, however in some instances, where sharing information with relatives may put vulnerable people at risk, access will be restricted and advice should be sought from the appropriate local authority.

#### **11. Discussing Concerns with vulnerable people and parents, guardians or carers**

- Discussing concerns with the vulnerable person/parents, guardians or carers involved can assist in clarifying the explanation for any injuries or other possible indicators of abuse. Where the explanation is unsatisfactory an honest response, such as advising of the need to discuss this with the appropriate local authority can help prepare the vulnerable person/parents, guardian or carer's for any further assessment.
- After discussing concerns with the vulnerable person/parents, guardian or carers, the worker should consult again with their line manager, and a decision will be made as to whether their remains a basis for concern and what further action, if any, needs to be taken. Where consultation with the vulnerable person/parents, guardian or carers alleviates concerns, this should be recorded and it is likely that no further action will be necessary.
- However, in accordance with Department of Health advice contained in "Working together to Safeguard Children" (2010), **"while professionals should, in general, seek to discuss any concerns with the family and, where possible, seek their agreement to making referrals to Children and Young People's Directorates this should only be done where such discussion and agreement seeking will not place a child at increased risk of significant harm"**. The Company will adopt this procedure for all vulnerable groups.
- The local authority should be contacted before contact with parents, guardians or carers and advice sought, where:
  - A vulnerable person has made an allegation of abuse by one or both parents, guardians or carers
  - There is evidence of possible violence from one or both carers
  - The allegation concerns a professional or volunteer working with the vulnerable person.

#### **12. Investigation**

- During investigation workers must be aware that it is their role to support the local authority in this process by providing accurate information. It is our role to observe and record incidents and not to investigate, or evaluate evidence. Inappropriate lines of investigation may jeopardise evidence should a case go to court.
- If, following a protection referral, the relevant manager is dissatisfied with the local authority proposed action, or decision not to investigate, they must discuss this with the Managing Director. The Managing Director may judge it necessary to contact a senior manager within the local authority to advocate further action, instigating where necessary the "Escalation Policy" available at [www.GSCB.org.uk](http://www.GSCB.org.uk)

#### **13. Requests for information from the Children and Young People's Directorate, Police or Adult Protection Unit**

- Where The Company receives a request from the Police or Adult Protection Unit for information as part of vulnerable adult protection enquiries, it will
  - If contacted by phone The Company workers will take contact details and refer the query to the designated manager who will manage the disclosing of information following its Limited Confidentiality policy.
  - Relevant information should be shared on a “needs to know” basis, within the context that the welfare of the vulnerable person is paramount and overrides issues of confidentiality
  - The designated manager will clarify with the Social Worker where appropriate whether consent of the vulnerable person has been given for the enquiry, and if not agreement should be reached on whether it is appropriate to seek consent prior to sharing information
  - Information shared will be recorded. The records should indicate whether the vulnerable person’s consent was obtained to share this information, and if not the reason for this should be recorded.
- Where The Company receives a request from Children and Young Person’s Directorate for information as part of Child Protection Enquiries under Section 47 of the Children Act, it will follow the above procedures in addition to:
- The records should indicate whether the parent’s or guardians consent was obtained to share information; if not the reason for this should be recorded.

#### **14. Support for Service Users and Staff**

- The Company will ensure that victims of abuse are supported at the time of crisis and on an on-going basis. Where we are unable to provide this support ourselves we will endeavour to refer service users to appropriate support agencies.
- The Company acknowledges that abuse and vulnerable person protection can be traumatic and emotionally draining. It often stirs up feelings of anger, guilt and disgust for the workers involved. Support will be offered to staff through supervision with their line manager and where appropriate through counselling.

#### **15. Young People over 16 years of Age**

- Young people aged 16 & 17 years old are entitled to receive protection under child welfare legislation. Whilst some local authorities may be reluctant to act in cases of abuse involving 16 & 17 year olds, it should be remembered that they have a duty to do so. The guidelines that apply to children under 16 years old should broadly apply to this group.
- Whilst acknowledging this, The Company must take into account the vulnerable person’s maturity and ability to participate in the process of their own protection.
- The Company upholds a vulnerable person’s right to a response appropriate to their age and self-determination, however this must always be considered within the framework of protecting them from harm.
- Children and young people under the age of 18 who are being sexually exploited may be at risk of significant harm, and if we suspect that a young person under 18 is involved or at risk of being sexually exploited, a referral following the local authority’s child protection procedure should take place. Adults over 18 suspected of becoming involved in prostitution should be considered as being ‘at risk’. In this case advice should be gained from the appropriate local authority.

## **16. Safe Recruitment Practice**

- The Company acknowledges that recruitment plays a key role in successful safeguarding arrangements
- Roles within The Company are exempt from the Rehabilitation of Offenders Act 1974 and as such all applicants must declare all convictions or pending cases against them, including spent convictions. The Company will treat this information in a confidential manner, and each case will be looked at in context, short listed staff will be offered an opportunity to discuss any criminal record in regards to child protection concerns.
- All workers whose job description/remit meets the criteria of Home Office Circular 42/94 will be required to provide criminal records statements prior to their engagement and will be subject to checks through the Disclosure and Barring Service DBS (the Government's "Disclosure Service"). Checks will be renewed every 3 years or earlier if there has been a significant change in job role.
- Non-disclosure of previous criminal convictions of any kind will result in workers being engaged in The Company's disciplinary procedures that may result in instant dismissal.
- References will be followed up and checked.
- Verification of identity, and where appropriate qualification documents, will be carried out.
- All short-listed applicants for paid or voluntary work must undergo a formal interview.
- Checks will be carried out for non-staff personnel with unsupervised access to children, including volunteers, students on placement, consultants and independent visitors.
- Reference should be made to The Company's Recruitment Policy.

## **17. Conduct of Workers**

- All workers must abide by The Company's Code of Conduct at all times.
- Workers should not form social relationships outside of our service specification. Workers should not take clients, specifically young people, to their homes, or give out their personal telephone numbers, or add clients as 'Friends' on Social Network sites such as Myspace or Facebook . To do so may be viewed as a disciplinary matter.
- Workers should not have more favoured or less favoured service users. Every user should be treated equally.
- Any inappropriate behaviour towards workers by a young person should be recorded, and if this behaviour was witnessed by others this should be recorded.
- Workers should avoid giving lifts to clients, specifically young people except to assist in the provision of support services, or as part of organised activities and should be adequately risk assessed.
- Workers should not enter into a close relationship, physical, emotional, or sexual, with any of our service users. This will be viewed as a disciplinary matter and may be reported to the local authority under section H2 of this policy
- Workers must never threaten or physically punish vulnerable people in their care. Any use of corporal punishment is not permitted. This will be viewed as a disciplinary matter and will be reported to the local authority under section H2 of this policy
- The term corporal punishment should be taken to include: any application of force as a punishment; slapping; throwing missiles; rough handling. The term corporal punishment should also be taken to include punching or pushing in the heat of the moment in response to violence from The Company's clients. It does not prevent a worker from taking necessary physical action where any other course of action is likely to fail to avert the immediate danger of personal injury to the client, the worker or another person, or the immediate danger to property.

- To be read in conjunction with The Company staff contact with service users and its chaperoning policy
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## **18. Other Policy Areas**

### **Child abuse and the Internet**

There has been a huge increase in the use of the Internet for purposes of child abuse, and in the possession and availability of indecent images of children. Many depict sexual abuse of children.

Adults also use the Internet to initiate contact with children hoping to 'groom' them for abusive relationships. Some adults use chat rooms to communicate with each other regarding child abuse.

#### **The Law**

- Possession of indecent images of children under the age of 16 is an offence.
- It is also an offence to make, distribute or show such images or possess them with a view to distribution.
- These offences can be committed via the Internet.

#### **Procedure**

- Any concerns regarding the use of the Internet to access indecent images must be reported to the designated manager through the Company IT Help Desk Procedure (see Annexe D).
- If it is discovered that someone is accessing the Internet for any uses relating to the abuse of children, as outlined above, the designated manager must inform the Police. The police will need to consider whether that person might be involved in the active abuse of children
- The internet can be accessed via smart phone, Ipad, PDA, MP4 Players and other handheld personal devices. Care must be taken not to disclose wireless passwords.
- Staff members should not disclose personal mobile telephone numbers to service users or contact them via social networking sites.
- No staff members should take photographs of young or vulnerable adults on their own personal photographic or digital equipment, or transfer to any portable storage device that can be removed from the company's premises.

## **19. Allegations Management**

### **How to deal with allegations of abuse against staff working with children and vulnerable adults**

#### **KEY PRINCIPLES:**

#### **If you manage or supervise staff working with children or vulnerable adults:**

- Ensure all staff know to whom to report concerns or allegations i.e. the designated manager, supervisor or leader;
- Refer to GSCB (Gloucestershire Safeguarding Children Board [www.gscb.org.uk](http://www.gscb.org.uk)) or the Adults at Risk Procedures ([www.gloucestershire.gov.uk](http://www.gloucestershire.gov.uk)) throughout the process;
- Ensure no action is taken that may undermine or jeopardise a police or social care investigation, particularly in the early stages of the process; under no circumstances should the company start an investigation.
- For incidents involving clients under 18 Liaise with the Local Authority Designated Officer (LADO) throughout the process;
- For incidents involving clients over 18 liaise with Social Care Adult Helpdesk;

- Consider the advice, guidance and training you give to The Company staff, including during recruitment and induction, about expectations of behaviour and safe practice.

**If you are a Company staff member working with children and vulnerable adults:**

- Make sure you know to whom you should report any concerns or allegations about a colleague or any other adult working with children;
- Report concerns or allegations as soon as possible, do not hold on to information however trivial or insignificant it may seem;
- Make sure you follow The Company codes of practice and be aware of appropriate professional boundaries at all times.

**INITIAL ACTIONS:**

**By any person receiving an allegation or having a concern:**

**DO**

- Treat the matter seriously and keep an open mind;
- Inform your designated senior manager immediately, or their deputy or other manager/supervisor if the senior manager is unavailable, or is the subject of the allegation;
- Make a written record of the allegation or concern as soon as possible after receiving information or observing behaviour that causes concern, including the date, time, person/s involved and what was said or observed. Sign and date this record and forward it to your designated manager.

**DO NOT**

- Attempt to investigate or deal with the situation yourself;
- Make assumptions, offer alternative explanations or diminish the seriousness of the alleged incident/s;
- Keep the information to yourself or promise confidentiality;
- Discuss the allegation or concerns with anyone other than those defined in The Company, GSCB's or Adults at Risk Procedures for managing allegations against staff.

**By the designated senior manager:**

**DO**

- Follow the advice of the LADO and act in a timely manner and follow due process;
- Inform the person reporting the allegation or concern what action you will take, in accordance with procedures and with regard to information sharing protocols;
- Contact the appropriate authority within one working day of receipt of allegation;
- Obtain written details of the allegation from the person reporting the incident/s (see above);
- Countersign and date the written details on receipt and keep secure;
- Maintain a written record of any discussions (with whom), action taken, decisions made (with reasons), including dates, times etc and keep secure;
- Collate any information you have about (i) the child, vulnerable person, parents/carers, siblings and (ii) the person against whom the allegation has been made e.g. address, dates of birth, previous concerns etc. and (iii) any potential witnesses;
- Maintain confidentiality;
- Help all parties understand the process.

- .4.1 10. Be prepared to attend multi-agency meetings to be an active member of the support team set up for the vulnerable person

## DO NOT

- Act alone or disregard GSCB, Adults at Risk or The Company's procedures;
- Dismiss, disbelieve or minimise the allegation or concern on the basis of your knowledge or opinion of the member of staff/volunteer concerned or the vulnerable person;
- Investigate the incident, interview or discuss with the member of staff, vulnerable person concerned, potential witnesses, unless advised to do so by the appropriate authority or a strategy meeting;
- Inform parents/carers of the child/ren/vulnerable adult until advised to do so by the LADO or a strategy meeting;
- Automatically suspend or dismiss the member of staff without seeking further advice.

## Staff should also refer to the Prospect Group of Companies' Policies/Procedures on

Staff Contact with Service Users

Recruitment

Grievance and disciplinary

Limited confidentiality Policy and Procedures

Confidentiality and Confidential reporting

Health and safety

Chaperoning guidelines

Underage sexual activity

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## 20. Limited Confidentiality Policy and Procedure

This document should be read in conjunction with The Company Safeguarding Vulnerable Groups Policy as well as Local Authority Vulnerable Groups Protection policies and procedures, DBS procedures, Recruitment Policy and Data Protection procedures.

### Introduction

- Confidentiality is essential within any organisation and, due to the nature of the services we provide, The Company is, at times, privileged to some very confidential information. This guidance document has been produced in line with The Company's, Gloucestershire Safeguarding Children Boards (GSCB) and Adult Protection Services protection policies and procedures. Under the stated guidelines there can only be a guarantee of **limited confidentiality**
- The principle of this policy is to establish confidentiality as a right and set clear guidelines for The Company to ensure good practice. Where records and information relating to learners and staff are kept, The Company's will need to be clear **why** this information is held and **who** needs to have access to it.
- **Confidentiality can mean different things to different people, The Company has a policy of 'Limited' confidentiality, where information is shared and restricted to certain people in the team, rather than kept by one individual; or where The Company's child protection procedures dictate that information will be shared with**



**relevant statutory bodies. The disclosure of information to external agencies by The Company will be in line with Local Authorities policies on sharing information for the protection of vulnerable groups**

- Discussion on issues of confidentiality will be encouraged in team meetings, staff training and in supervision; the purpose of this is to increase the staff team's understanding of limited confidentiality.

### **Breaches of Policy**

- Breaches in confidentiality may jeopardise the wellbeing of staff and learners. When working with vulnerable people it is essential to create a trusting relationship on which some forms of counselling and advisory work depend. However, vulnerable people should think very carefully before making certain types of disclosures and be aware that a limited confidentiality policy is operational.
- Breaches in confidentiality, which are contrary to the terms of this policy, may be subject to disciplinary proceedings or in the case of learners, a withdrawal of services.
- Staff will be subject to disciplinary proceedings if the following occurs:
  - Confidentiality is broken inappropriately
  - Inappropriate use of data held by The Company
  - Disclosure of client or staff details to unauthorised parties

### **General Principles**

- **Disclosure:** The ultimate reference point for deciding who should be informed of a piece of confidential information should be the individual concerned.
- **Informed Consent:** It should be stressed that consent should be informed consent i.e. the reasons for sharing/not sharing information should all be discussed with an individual.

### **Personnel and Administration**

- All staff will be given a copy of the confidentiality policy as part of their induction. The implications of the policy for their work will be explained.
- Personnel files and other confidential staff records will be kept in a locked cabinet for which the Operations Director is the only key holder, in line with good practice guidelines in regards to CRB procedures.
- Job application forms, job interview records and job monitoring forms are confidential to The Company. The interview panel will hand in all papers at the end of interviews.
- References - when references for new employees are requested, it will be made clear that the references will be available only to the staff member concerned, otherwise they will be confined to the line manager/Director and members of the interview panel.
- Supervision - with the exception of disciplinary action, information discussed in supervision will be confidential to the people concerned in the meeting and the supervisor's line manager.
- General Office - the programmes manager is responsible for ensuring that all staff keep to the office systems procedure. This entails being clear about who has access to what information, that filing cabinets and key boxes are locked when the office rooms are not staffed.
- IT - The Company is registered under the Data Protection Act 1998.
  - Individuals have the right to:
    - be informed if information is held on her/him
    - have access to such information within 40 days
    - where appropriate to have it corrected or erased
  - Exemptions:
    - mailing lists
    - pay details

- statistics, providing persons cannot be identified
- information acquired from statutory agencies, which may cause harm to that individual or another.
- Confidential information stored on disc will be kept in a secure and locked cabinet. Where information is erased on computer for reasons of confidentiality, it must also be erased on all back-up discs and copies.

## Learners

- Any information held on learners will be confidential to members of the staff team. They will have access to their own files through appointment with their tutor. All files are kept secure and destroyed after the appropriate contractual time specified.
- Records Kept
  - Information regarding application details, references, next of kin, previous address, contact numbers etc and on-going correspondence between The Company and any client will be kept in the client's file.
  - Age, gender, disability, racial/ethnic origin, referral source, date of departure, training offered and given, how long using The Company's services, reasons for leaving, where moved on to, criminal record and other support needs (where appropriate).
- The Company may give information to Housing Benefit Departments when this has been authorised by a client.
- The following guidelines should be adhered to: -
  - Service User Records in hard copy should be kept in, preferably a locked if unsupervised, cabinet with access denied to unauthorised parties.
  - Service User Records in electronic copy should have access denied to unauthorised parties by use of password protection for logging onto the system for details.
  - Data should be kept in line with the Data Protection Act 1984 and 1998.
  - The Company's service users should be informed of the Limited Confidentiality Policy in place through induction
  - Any information discussed with Service Users should be kept confidential unless disclosure is necessary under The Company Safeguarding Vulnerable Groups group of policies and procedures
  - Telephone Numbers and Addresses of Staff and Service Users are strictly confidential and should never be disclosed.
- Information should never be given out over the telephone unless: -
  - You are certain that you are aware of whom you are speaking to.
  - You return the call so that you are aware of whom you are speaking to.
- Service Users should never be discussed outside company business hours and only to authorised colleagues in connection with legitimate Service User business during business hours.
- Through support and advice work with service users, notes and records may be kept, however, the following is to be noted.
  - If a worker receives a contentious or difficult unsolicited disclosure and is asked to keep it to themselves, they will need to make clear that staff may need to share information with their Line Manager and that it is possible for staff to:
    - Refuse to agree to a contract of absolute confidentiality and
    - Not to continue a conversation if they feel that it may be heading to an area of disclosure that they are unhappy to take on board. Wherever possible, consent is sought to share this information.
- Discussions with Services Users should include the following:
  - The Company operates a limited Confidentiality Policy and that information shared is confidential unless it is felt that either the service user themselves or anyone else is at risk.

- Do not promise that you would not disclose the information to other agencies, do explain the reporting procedure for The Company and why you may have to disclose information.
- Records are kept on a database in line with the Data Protection Act 1984 and 1998.
- Learners are expected to respect the rights of other service users in regards personal information on each other. A breach of confidentiality by a service user about another service user may be viewed as harassment and may be seen as cause for a withdrawal of services.
- Learners are expected to respect the rights of staff to confidentiality.
- Service users taking part in media events must not disclose a project address or names of other service users for public information. They will be clearly informed that they are not obliged to take part in any media events if they do not wish to do so.

### **Contractual paperwork**

- All paperwork will be considered confidential. This includes all paperwork generated by The Company to aid in contractual compliance as well as paperwork completed by staff to demonstrate good practice in contract compliance.
- Any member of staff distributing or lending such paperwork to external non contractual agencies without prior approval from The Company's senior management may be subject to disciplinary proceedings.
- The Company will assess when a situation necessitates breaching confidentiality. Confidentiality is rarely broken. The type of instances in which confidentiality may be breached are as follows:
- If a service user poses a serious risk to themselves or others. In these instances The Company may give information to statutory/emergency services. E.g. Police, appropriate local authority departments or to a housing agency or support agency.
- Information will be provided to the Police and where relevant insurance companies, when crimes have been committed against staff, service users and property.

### **21. Staff contact with service users**

To be read in conjunction with The Company Safeguarding Vulnerable Groups Policy, Chaperoning Policy, Lone Working Policy, Staff Confidentiality and Disclosure of Information Policy and PTS Grievance and Disciplinary Procedures.

The Company has clear, accredited procedures for the protection of vulnerable people. The implementation of these procedures is mandatory and staff should ensure they are familiar with the contents. In order to ensure professional and safe practice by staff in their contact with service users and 3<sup>rd</sup> parties involved in cases, staff should familiarize themselves the directions below.

- It is explicitly forbidden for staff to engage in a personal relationship with a vulnerable person, **whatever their age** who is a service user of The Company. This instruction covers both on duty and off duty time. **(Definition of a vulnerable person can be found in the Safeguarding Vulnerable Groups Policy).**
- A personal relationship should be taken to mean 'Any non-work related contact that might be construed as a friendship or where the employee might reasonably be presumed to be in a position where their actions might bring The Company into disrepute or subject to criticism'.
- Such relationships need not be emotional or intimate. Staff must not invite service users to their homes or visit service users in theirs unless it is to carry out work agreed on behalf of The Company. Meeting service users in other venues, except where intended and appropriate for the discharge of The Company's work, is also forbidden.
- In any event, staff should ensure they inform their Line Manager or use the agreed 'whereabouts' procedures so no suggestion of unauthorised contact can be made. **(See Lone Working Policy).**

- Staff should not include clients as friends on Social Networking Sites or other online chat forums. This may be considered as a disciplinary issue in line with the Safeguarding policy.
- Staff are further reminded that personal relationships with 3<sup>rd</sup> parties related or known to service users should be avoided. We fully acknowledge the right of employees to privacy in their own affairs. However, experience has shown that such relationships can create conflicts of interest for employees that can compromise the professional integrity of the worker and PTS.
- If staff members are concerned about any service user seeking a relationship or if staff have reason to believe that any of the above directions are likely to be or have been breached, they should inform their Line Manager at the first opportunity. Staff are reminded that they have both professional and legal obligations to disclose confidential information in certain circumstances and that The Company has a Staff Confidential Reporting Policy that clearly states its commitment to supporting staff with concerns or worries that need reporting to management. (See Staff Confidentiality and Disclosure of Information Policy)
- Staff are reminded that breach of the above directions will potentially result in The Company reporting staff actions to the appropriate local authority in line with its Safeguarding Vulnerable Groups Policy section H2 and may be subject to disciplinary action under the category of Gross Misconduct rendering them liable to summary dismissal.

## **Annexe A**

### **Safeguarding Vulnerable Groups Referral Process & Contact Details**

All individuals working with children and families have a duty and responsibility to report any allegations or concerns of a vulnerable person / child protection nature. When such a concern is raised you should follow the process below.

When a safeguarding/prevent concern arises, the safeguarding manager must be informed immediately, either verbally over the phone or by using the safeguarding incident referral form electronically; in either case, a hard copy of the referral form must be submitted within 48 hours. We are obliged to ensure that these forms are fully completed with no omissions or any missing vital information.



The staff member should submit the safeguarding incident referral form with an electronic copy being held by the staff member in a secure password protected folder. Please ensure that no sensitive information is ever retained in a learner/customer file – the safeguarding incident number can be held on file



The safeguarding manager will acknowledge receipt of the concern within 24 hours by email and will assign an incident number as well as advising the staff member of the proposed review schedule. In the case of a Prevent concern the safeguarding manager will refer to the prevent and channel process



Please remember that your responsibility is to report concerns to the safeguarding manager, do not deal with the concern yourself: you will be involved throughout the process in order to support the learner/customer (where appropriate)

**You will find all relevant paperwork, processes and any safeguarding guidance upon the Prospect Training Services Cloud in the Safeguarding Folder.**

## **Annexe B**

### **External Speakers Process**

When a member of staff has identified an external organisation/speaker to attend a planned session they are required to complete the external speakers risk assessment in order to create a safe learning environment and remove the potential risk of radicalisation in line with our SVG/Prevent policy. If the external organisation/speaker is expressing a specific ideology then the member of staff must ensure that those views are counteracted within the same session.



It is the member of staff's responsibility to ensure that enough time is given to fully complete the risk assessment in order for the SVG Rep to approve the external organisation/speaker prior to the planned session. If the external organisation/speaker has previously attended a planned session the staff member must request a copy of the external speakers evaluation form from the SVG Manager as part of the risk assessment.



It is not mandatory for an external organisation/speaker to have a DBS as it is a requirement for ALL external organisations/speakers, regardless of whether they have a DBS to be supervised at all times. The staff member supervising should ensure that no photographs are taken by the external organisation/speaker at any time.



Once the SVG Rep has approved the external organisation/speaker the risk assessment must be sent to the SVG Manager to be added to the SVG referral register.



Following the session, it is the responsibility of the member of staff to complete the external speaker's evaluation form and send to the SVG Manager. The SVG Manager will add the details to the SVG Referral register. If the feedback on the evaluation form raises any concerns with the SVG Manager and it is decided that PTS would not use them again in the future an email will be sent out to all staff to update.

***Please Note: If any Safeguarding/Prevent concerns arises during the session please refer to the SVG/Prevent Referral process and report the concern immediately.***

## Annexe C

### Prospect Training Services IT Help Desk

- When a learner/customer uses any PC or Laptop in any of the training rooms this must be logged on the **PC/Laptop Room Plan** for that session (see example plan)
- It is the responsibility of all staff to monitor learners/customer usage
- If a learner/customer is observed accessing a prohibited site (see **Prohibited Sites List**) the member of staff must ask the learner/customer to take a seat away from the PC and where possible try to record the details of the site i.e. website address then close the page so no other learners/customers can see it. It would be useful to make a log of the time and date of the incident too
- If the learner/customer closes down the site before you get the chance to obtain the details, please just record the time, the date and what you have witnessed
- The learner/customer should then be restricted from using the PC/Laptop for the remainder of that session and informed that this will be reported to the safeguarding team
- When the session ends the member of staff should complete a **Safeguarding Incident Referral Form**, indicating whether this is a Prevent concern
- The member of staff should also log onto the **Prospect Training Services Help Desk** to report the incident. This can be found at <https://pts.on.spiceworks.com/portal>
- Please ensure you record the incident under the correct heading and give as much detail as possible and also attach a scanned copy of **PC/Laptop Room Plan**
- Please also ensure you keep the **PC/Laptop Room Plan** to pass onto the safeguarding team

#### Prohibited Sites

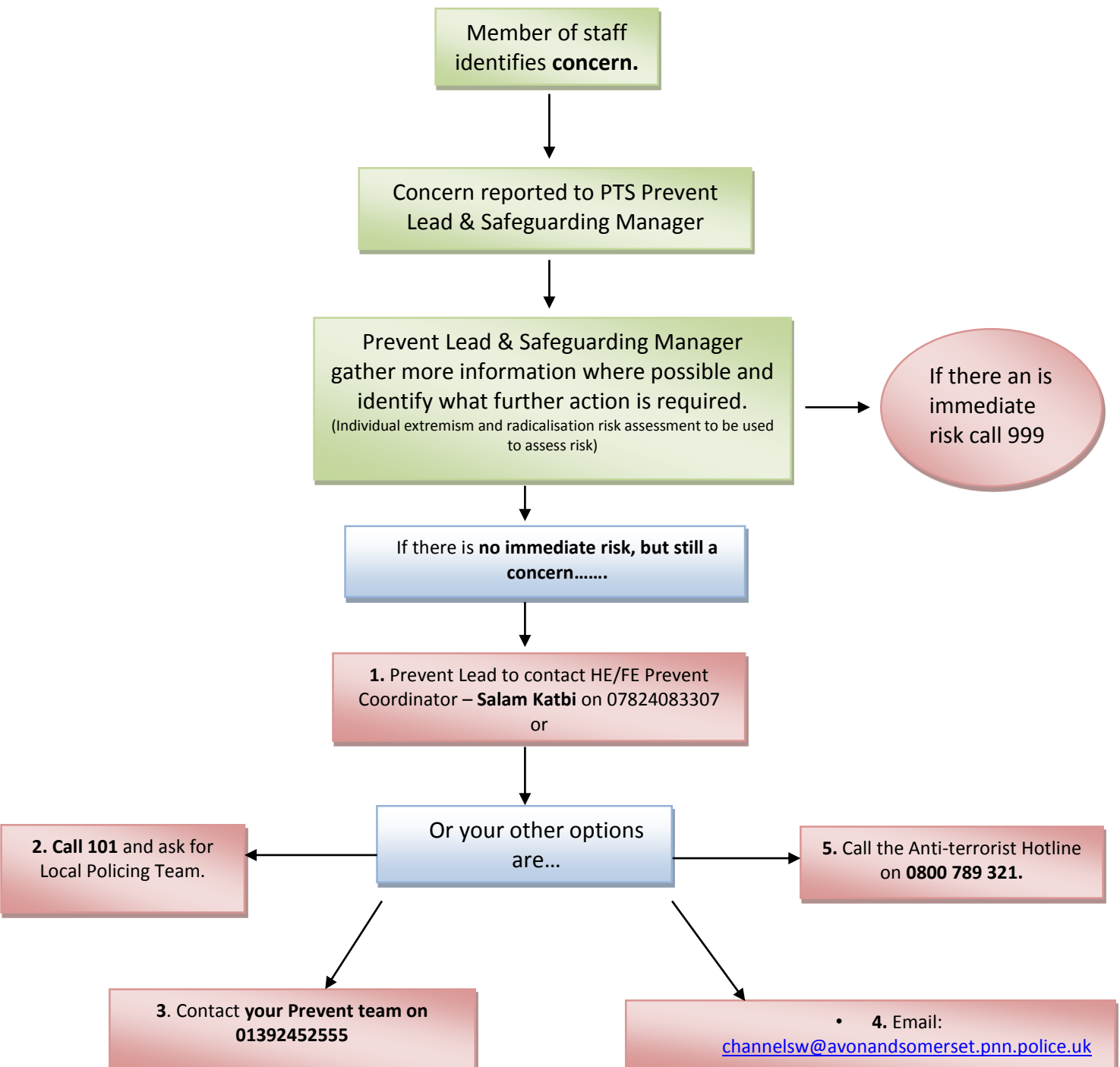
- All social media sites
- Any sites with adult content
- Any sites promoting alcohol, tobacco or narcotics
- Any sites containing violence, profanity or obscenity
- Any sites containing weapons, explosives, pyrotechnics
- Any gambling sites
- Pornographic
- Any sites promoting extremist material
- Any online shops and commerce
- Any sites promoting self-harm or bullying
- Gaming sites

This list is not exhaustive if you feel a website is inappropriate and you are concerned about what you have seen please report it.

## Annexe D Prevent and Channel

### Process map for reporting a concern of a vulnerable individual

It is important for you as a member of staff know where to go if you have a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process as to which you can follow:





Once a referral has been made and enters the Channel process, the below process map illustrates what happens next...

Further information gathering with your institution and other key agencies that the individual is involved with. Are there shared concerns between partners? Is there a vulnerability to radicalisation?

No

If it is deemed there is low risk –further action within normal support. Key agency progresses with further monitoring.

Yes

Police will organise a Multi-Agency Channel meeting which will be made of key partners. The meeting will be chaired by Gloucestershire County Council.

It is important to remember that consent is gained with the individual to be part of Channel support and intervention.

Implement bespoke support plan

Regularly review process – Channel Panel members work together to review progress and reduce risks.

The individual will exit the Channel process when all partner agencies feel that the vulnerability to radicalisation has been significantly reduced.

Once a referral has exited the process, it will be reviewed at 6 and 12 months. If concerns remain, the individual can be re-referred.

## Annexe E Useful Contact details

Organisation	When to contact	Contact Number	Name/post
1. GSCB (Gloucestershire Safeguarding Children Board)	Information Advice and Guidance (IAG) Staff Training	01452 583629 <a href="http://www.gscb.org.uk">www.gscb.org.uk</a>	Administration
	IAG	01452 583638	Safeguarding Manager
2. Gloucestershire's LADO (Local Authority Designated Officer)	Reporting abuse allegations/concerns against professionals (Members of staff and other professionals)	01452 426994	Jane Bee <a href="mailto:jane.bee@gloucestershire.gov.uk">jane.bee@gloucestershire.gov.uk</a>
4. Children and Families Helpdesk (Social Services)	Making a child welfare referral Urgent referrals by phone; where a child is at risk of significant harm.	01452 426565 <a href="http://www.gscb.org.uk">www.gscb.org.uk</a>	Duty social worker
4a. Emergency Duty Number Out of Hours	<b>For a general referral where there is a concern for the welfare of a child a MARF (Multi Agency Service Request Form) should be completed via the portal</b>	01452 614194	Duty social worker
5. Social Services Help Desk	<b>For advice</b>	<a href="mailto:childrenshelpdesk@gloucestershire.gov.uk">childrenshelpdesk@gloucestershire.gov.uk</a>	Duty Social Worker
6. Child Line	IAG	0800 1111	N/a
7. NSPCC (Glos)	IAG	01452 300616	N/a
8. Police Control Room	Non Emergencies	101	Control Room

### Adult Services 18 Years old and over

Organisation	When to contact	Contact Number	Name/post
1. Adult Helpdesk (Social Services) 4th Floor, Block 4, Shire Hall, Westgate Street, Gloucester	Reporting welfare concerns	01452 426868 <a href="http://www.gloucestershire.gov.uk/gsab/board">http://www.gloucestershire.gov.uk/gsab/board</a>	Duty Social Worker

