



General Manual

Subject: Safeguarding Policy
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Aim

To ensure that no client, volunteer or member of staff within Life is subject to any kind of abuse by having appropriate recruitment, training and reporting procedures in place so that all types of abuse cases are handled effectively and efficiently. The policy will protect vulnerable people from abuse and help minimise unjustifiable allegations of abuse against staff members. The purpose of this policy is to ensure all staff and volunteers understand the appropriate course of action should they discover or suspect a client, or other vulnerable adult, is at risk of harm or is being harmed by others.

Key points

Safeguarding is everyone's responsibility and all staff and volunteers who, during their employment have direct or indirect contact with children or vulnerable adults, or who have access to information about them, have a responsibility to safeguard and promote their welfare.

For Life this means:

- 1) ensuring that Life practices **safe recruitment** in checking the suitability of staff, and volunteers to work with vulnerable adults and have contact with children.
- 2) ensuring **safe environments** checking the suitability of Life premises and, ensuring services are provided in safe environments and that sufficient safeguards are in place.
- 3) raising awareness of how and when to **signpost vulnerable adults** to appropriate services.
- 4) raising awareness of **child and adult protection** situations, and our procedures for identifying and reporting concerns or suspected cases.
- 5) building a **culture** that values and respects all children and adults and modelling appropriate conduct in line with our values.
- 6) setting out clear **roles and responsibilities** for safeguarding.
- 7) ensuring that policies and procedures relating to safeguarding are aligned with the relevant Local Area Safeguarding Children Boards and Adults Boards Procedures Manual incorporating all relevant protocols. Please see Appendix A for a list of local contact details of local Safeguarding boards. All Safeguarding and Organisational self-assessment audit will be conducted annually, and safeguarding policy and procedures will be reviewed every year or in the light of significant changes to best practice or legislation.

Safer recruitment

Life ensures that we do our utmost to employ 'safe' staff and allow 'safe' volunteers to work with clients and service users. Safer recruitment means that all applicants will:

- complete an application form or provide a CV which includes their employment history
- provide two referees, including at least one who can comment on the applicant's suitability to work with children and/ or vulnerable adults
- provide evidence of identity and qualifications
- be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role
- provide evidence of their right to work in the UK
- be interviewed by an appropriate panel according to the role applied for.

Life will also assess the candidate's mental and physical fitness to carry out their work responsibilities. At least one member of each recruitment panel will understand the principles of safer recruitment. All new members of staff and volunteers will undergo an induction that includes familiarisation with Life's safeguarding policy, code of conduct and identification of their safeguarding training needs. Life maintains records of recruitment checks undertaken.

Safe environments

Life's clients may be asked to share their experiences and stories with local and national media or as part of Life's media strategy. Life's Media policy gives clear guidelines on how to protect clients. Informed consent must be given before images can be used will ensure that all environments where services are delivered will not cause harm to vulnerable adults or children. As well as ensuring that staff/volunteers are appropriately trained to deliver services, all service delivery environments will be assessed in line with Life's Health & Safety Policies.

Signposting vulnerable adults to support

Staff or volunteers may come into contact with clients by phone, text, face to face or through interactions online, social media and other written communication. Some of these clients may be particularly vulnerable, experiencing distress or have mental health issues. For most of these adults their situation will not be of a nature that requires a member of staff to report a concern. However, if the member of staff or volunteer does not have appropriate expertise to deal directly with these issues it is vital that they signpost effectively, either internally or externally. Please see Appendix A for a list of local contact details of local Safeguarding boards. Staff and volunteers should be trained to recognise their own limitations. Life will keep up to date details of organisations with whom we have service agreements with to make suitable referrals.

Child and adult protection

There are several situations where contact with children would occur including:

- children living in a Life house
- parents bringing their children to a Pregnancy Matters™ centre
- a parent under 18 years old accessing a service
- students receiving a Life Matters educational service.

Staff or volunteer may be alone with a child face to face in the above situations.

Life has contact with clients either face to face, online, over the telephone and in writing. These situations include;

- as a tenant in a Life house
- as a client in a Pregnancy Matters™ Centre
- as a shopper or volunteer in a Life shop
- delivery of training or educational talk
- use of Pregnancy Matters™ Online services

Awareness of Life's policies

All staff and volunteers are required to read Life's Safeguarding Policy and procedure to know their responsibilities in their role and to provide signed confirmation of this on the Induction checklist. Staff and volunteers working directly with clients and services users should receive additional training to identify signs of abuse and know how to report concerns.

Alert to the signs of abuse

Our role in protecting children and vulnerable adults is to pick up clues that the child or adult may need protecting and pass this information to those who can assess the situation and act when required. Staff and volunteers are required to be aware of the different types and signs of abuse and the circumstances in which it can occur. Guidance on recognising signs of abuse is provided in the guidance section of this policy.

Aware of duty to report concerns

All concerns and allegations of abuse will be taken seriously and responded to appropriately (this may require a referral to Children's Services and/or the Police). Staff and volunteers have a duty to report concerns in line with Life's procedures. Failure to comply with these responsibilities will be a serious matter which may lead to disciplinary action.

No single person can have a full picture of a child or vulnerable adult's needs and circumstances and, if children, vulnerable adults and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. In order that organisations and practitioners collaborate effectively, it is vital that every individual working with children, vulnerable adults and families is aware of the role that they must play and the role of other professionals.

In addition, effective safeguarding requires clear local arrangements for collaboration between professionals and agencies. Any professionals with concerns about a child or vulnerable adult's welfare should make a referral to the Local Safeguarding Board, MASH team or Children's Services in accordance with local safeguarding procedures and protocols. Professionals should follow up their concerns if they are not satisfied with the local authority children's social care response.

Confidentiality

Whilst abiding by Life Confidentiality Policy, safeguarding concerns are paramount and therefore staff and volunteers should act accordingly. For example, confidentiality can be broken if there is significant risk or harm to self or others.

In respect of vulnerable adults all action, including referrals to Social Services and the police, must be subject to the consent of the service user (unless there is risk of significant harm to self or others). Staff and volunteers should never give absolute guarantees of confidentiality to anyone wishing to tell them about something serious.

Life's complaints procedure is an important way in which concerns can surface and should be easily accessible to clients.

Awareness of how and when to take action.

All safeguarding incidents should be recorded on the incident form and emailed to line manager and safeguarding officer. Level 3 safeguarding incidents should also be sent to the Safeguarding lead. This form will be stored securely in compliance with relevant legislation. Where necessary the relevant Local Safeguarding Board or MASH team should also be alerted to a Level 3 incident.

Allegations of abuse or concerns raised against members of staff, volunteers, trainers or trustees, will always be treated seriously. Where there is an allegation against a member of staff the Safeguarding lead manager, Deputy CEO and HR manager should be informed so that the LADO process can be invoked.

Culture

Staff

Staff must work in line with the equality and diversity policy to value diversity and respect the contribution of everyone.

Employees are encouraged to raise concerns about employment practices and concerns will be taken seriously. Unlawful discrimination, bullying or harassment will not be tolerated. The Grievance Policy sets out how to raise concerns both informally and formally, how concerns will be investigated and support for individuals raising a concern as well as for employees who are the subject of a complaint. Employees will not suffer any negative treatment for giving constructive criticism or raising a genuine grievance.

Life's whistle blowing policy provides guidance for staff and volunteers on confidential reporting of concerns about wrongdoing in the workplace.

Life also has a clear policy for staff on IT usage forbidding inappropriate use of materials which includes sexually explicit material, obscene remarks and abusive or discriminatory messages.

a. Online forums and Facebook

Life works to ensure that our online forums and Facebook page are safe and supportive places where service users and supporters feel comfortable to express themselves and share their experiences.

Life also recognises the potential for social media to be used for malicious accusations against members of staff and volunteers. Should an allegation be made against a member of staff, Life has a duty of care to its employees and will do everything to minimise the stress of any allegations and the disciplinary process. The person who is the subject of the investigation will be informed as soon as the allegation has been made, but only after their Line Manager has been alerted. The employee will then be advised on what the next course of action will be. However, if the police or social services are to be involved, they will be contacted before the

employee and will advise as to what information may be disclosed to the person under investigation.

The employee may need additional support and Life consider what might be appropriate to best accommodate this. If it is a criminal investigation and the police are involved, they may provide this additional support.

While we encourage lively debate, we do not tolerate behaviour which makes other users feel uneasy or unable to contribute to the page. As such, we reserve the right to remove posts which are aggressive in tone, abusive towards other users or disruptive to how the forum or page operates. Racist, sexist, homophobic or bullying posts will be removed without delay. This is common practice and corresponds with Facebook's terms and conditions.

c) Support for children and vulnerable adults

Our Safeguarding policies and procedures and working practices adopt the Safer Surrey approach which works on the belief that children and their families have the strengths, resources and ability to recover from adversities. It has its roots in solution focused practice and creates a common language used by all professionals from universal services through to child protection.

Safer Surrey invests power in children and families to help themselves and puts practitioners in the role of supporting and helping them rather than as directors of change. The approach encourages professionals to support and reinforce child and family functioning rather than focus on individual or family deficits. It incorporates the use of restorative

practice in resolving disputes within supported accommodation, for example.

Roles and responsibilities

Safeguarding and Child Protection Responsibilities are set out as follows:

- Trustees are accountable for Life and therefore all safeguarding within the organisation and will receive quarterly reports on safeguarding.
- The Chief Executive Officer is accountable to Trustees for safeguarding within the organisation and will ensure a clear framework for the management accountability for safeguarding is in operation.
- The Leadership Team is accountable to the Chief Executive Officer for safeguarding within their departments, for giving leadership on safeguarding as a corporate issue and ensuring it is integral to their department's plan.

The Safeguarding officer will provide advice and support to staff unsure about how to proceed with a case including on the relevant local safeguarding procedure or protocol to follow, and take line management responsibility for the safe delivery, quality and effectiveness of their services.

- The Safeguarding lead manager and officer will stay abreast of developments on safeguarding best practice, advise on changes to policy and practice and coordinate Safeguarding audits and reporting.
- Staff and volunteers are expected to be vigilant in noting and reporting safeguarding concerns when dealing with vulnerable adults and children.

Serious Incident Reporting

Allegations of abuse towards vulnerable beneficiaries by Life Trustees, staff or volunteers constitutes a serious incident which must be reported to the Charities Commission. This will be done as soon as the charity becomes aware and in line with the guidance found here

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/375979/Reporting_Serious_Incidents_LowInk.pdf

Associated Life Procedures

- Female Genital Mutilation (FGM)
- Radicalisation including Gangs
- Child Sexual exploitation and Trafficking (Children and Adults)
- E-safety/Cyber-bullying
- Missing Persons
- Safeguarding procedure including LADO process
- Domestic Abuse including Honour Based Violence and Forced Marriage
- Self-harm and suicide


Additional Information and legislation underpinning Life's duty of care and legal responsibilities

- Local Area Safeguarding Boards policies, procedures, protocols and guidelines
- Children Act 1989 and 2004
- Care Act 2014 (Safeguarding Vulnerable Adults)
- Serious Crime Act 2015
- The European Convention of Human Rights
- Equality Act 2010
- The Rehabilitation of Offenders Act 1974
- The Protection of Freedoms Act 2012
- The Criminal Justice and Court Services Act 2000
- Safeguarding Vulnerable Groups Act 2006
- Children and Families Act 2014
- Adoption and Children Act 2002
- Children and Young Persons Act 1963 and 2008
- Female Genital Mutilation Act 2003
- Children and Social Work Act 2017
- Human Rights Act 1998
- Data Protection Act 1998
- Criminal Justice Act 1998
- Public Interest Disclosure Act 1998
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- United Convention of the Rights of the Child 1991
- Counter Terrorism & Security Act 2015 - Prevent Duty

- Revised Prevent Duty Guidance for England & Wales: July 2015
- Life Data Protection and Confidentiality Policies
- Working Together to Safeguard Children (2015)
- Common Assessment Framework (CAF)
- Multi-Agency Public Protection Arrangements (MAPPA)
- Multi Agency Risk Assessment Conference (MARAC)
- No Secrets (Department of Health)
- Special educational needs and disability (SEND) Code of Practice: 0 to 25 years - Statutory Guidance for organisations which work with and support children and young people who have special educational needs or disabilities: January 2015

Life policies - GDPR compliance

1. I have read and understood the Life GDPR Policy and confirm that the policy above fully complies with it in all areas ☒ X
2. Lawful basis for this policy (tick which one(s) apply)
 - a. Legal obligation ☒ X
 - b. Legitimate Interest ☒ X
 - c. Contract ☒ X
 - d. Vital Interest
 - e. Consent ☒ X
 - f. Special Category (e.g. Children's data) ☒ X

Please state the purpose for special category: Children & Adults Safeguarding
3. I confirm that all personal data is:
 - a. held only in the locations detailed in this Policy ☒ X
 - b. used only for the purposes stated ☒ X
 - c. held securely ☒ X
4. A Data Processor Agreement is in place with all external organisations (Data Processors) who are in receipt of personal data under the terms of this Policy: (tick to confirm) ☒ X
5. The relevant Privacy Notices under this Policy have been published in an appropriate manner: (tick to confirm) ☒ X
6. The person(s) responsible* for data protection covered by this policy are:
 _____ Vicky O'Brien _____ (date) 20.03.2019 _____
7. As the above-named person I confirm that this Policy complies with the General Data Protection Regulations 2018
 Signed

 Name _____
 Date 20.03.2019 _____

Note: * Life has chosen not to appoint a Data Protection Officer which is permitted under GDPR and so this responsibility is devolved to the appropriate person named under this Policy.