Power 2 Connect (P2C) Policies

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SAFEGUARDING (INCLUDING CHILDREN AND VULNERABLE ADULTS) POLICY

Power to Connect (P2C) is fully committed to safeguarding the welfare of all individuals who engage with our organisation including vulnerable adults. It recognises its responsibility to take all reasonable steps to promote safe practice and to protect individuals from harm, abuse and exploitation regardless of age, sex/gender, disability, race/ethnicity, religion, or sexual orientation. P2C acknowledges its duty to act appropriately when it receives any allegations, reports or suspicions of abuse. Paid staff and volunteers will work together to encourage an ethos which embraces difference and diversity and respects the rights of individuals.

This policy covers all adults including vulnerable adults accessing services run and managed by the organisation. P2C will review its policy and procedures on a regular basis to take account of any new government legislation, regulations or best practice documents to ensure that staff and volunteers are kept up to date with their responsibilities and duties with regard to the safety and wellbeing of vulnerable adults.

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For further information about Safeguarding visit:

- www.londonscb.gov.uk – Child Safeguarding
- http://www.scie.org.uk/publications/adultsafeguardinglondon/index.asp – Adult Safeguarding
- www.wscb.org.uk – Wandsworth Safeguarding Board
- https://learning.nspcc.org.uk/ – NSPCC

Relevant Legislation

- The Care Act 2014
- The Care and Support Statutory Guidance – updated Dec 2016
- The Protection of Freedoms Act 2012
- Safeguarding Vulnerable Groups Act 2006
- The Children's Act 2004
- No Secrets: guidance on protecting vulnerable adults in care - Department of Health -updated January 2015
- Data Protection Action 2018

Policy Statement

- P2C is committed to the health, safety and welfare of all people participating in courses or activities.
- P2C ensures that all staff and volunteers are fully informed and trained in safeguarding protection issues and understand their responsibilities and how to carry them out.
- P2C and its staff have collective responsibility to prevent abuse or protect at-risk adults and to respect and to report any abuse discovered or suspected.
- P2C will ensure that all staff and volunteers are aware of the policies and procedures.
- P2C expects that all staff and volunteers to act upon any concern regardless of how small or trivial it may seem.
- Where adults have been viewed as vulnerable P2C expects staff and volunteers to pay special attention to the learners' learning needs and consider any special requirements that they may have.
- P2C ensures staff, volunteers and Board of Directors are up to date with national developments relating to the welfare and protection of children, young people and vulnerable adults.

What is a 'child' and a 'vulnerable adult'?

The Children Act 1989 defines a **child** as being up to the age of 18 years.

While P2C does not directly work with children and young people, we do provide services in settings such as Children's Centres, nurseries, or schools. As part of our commitment to safeguarding, we require all staff and volunteers to undergo an enhanced DBS check.

Under the Safeguarding Vulnerable Groups Order 2007 (SVGO), a **vulnerable adult** is defined as:

1. An Adult is a person aged 18 or over who is receiving services of and in consequence of a condition or has a disability.
2. A person whose role includes the day-to-day management or supervision of any person who is engaging in regulated activity.

This definition has now been amended in the Protection of Freedoms Act 2012. Due to the amendments to the definition of 'vulnerable adult', adults accessing services through P2C are not necessarily 'vulnerable'. However, P2C recognises that we have a moral duty to safeguard the wellbeing of all individuals and those who are or may be 'in need of community care services by reason of disability, age or illness; and who is or may be unable to take care of him or herself against significant harm or exploitation'. (Department of Health 2000).

In the event of an individual who is considered to be 'vulnerable' for other reasons and of any concerns of abuse, we will follow our safeguarding procedures.

What is abuse?

Abuse is about the misuse of the power and control that one person has over another. In determining whether or not abuse has taken place, it is important to remember that intent is not the issue. The definition of abuse is not based on whether the perpetrator intended harm to be caused, but rather on whether harm was caused, and on the impact of the harm (or risk of harm) on the individual. The Care Act guidance defines the types of abuse as:

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence.
- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. NHS England have published a new web page which outlines what modern slavery is (external link) and the impact that it has on victims.
- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational abuse** – including neglect and poor care practice within an institution care setting such as a hospital or care home, or in one's own home.
- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating; and
- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Code of Behaviour for P2C Staff and Volunteers

P2C recognises that it is not practical to provide definitive instructions that would apply to all situations at all times whereby staff and volunteers come into contact with at risk individuals and to guarantee the protection of at-risk individuals and staff. However, below are the standards of behaviour required of staff in order to fulfil their roles and duty of care within P2C. This code should assist in the protection of both individuals and members of staff.

Staff must:

- Implement the Safeguarding Policy and Procedure at all times.
- Have due regard to the safe and responsible use of online and digital technologies.

Staff must never:

- Engage in rough, physical games including horseplay.
- Allow or engage in inappropriate touching of any kind.
- Do things of a personal nature for adults that they can do for themselves.
- Physically restrain an adult unless the restraint is to prevent physical injury of the adult/other adults/visitors or staff/themselves. In all circumstances physical restraint must be appropriate and reasonable; otherwise, the action can be defined as assault.
- Make sexually suggestive comments.
- Have adults on their own in a vehicle. Where circumstances require the transportation of individuals in their vehicle, another member of staff/volunteer must travel in the vehicle. Also, it is essential that there is adequate insurance for the vehicle to cover transporting these individuals. In extreme emergencies (for medical purposes) where it is required to transport an individual on their own, it is essential that another member of staff is notified immediately.
- Spend time alone with a vulnerable adult where their activity cannot be seen, or their conversations cannot be overheard by another adult.
- Share personal mobile, email or social media sites with individuals.

Procedures

It is the responsibility of all staff and volunteers to report and record safeguarding concerns where they believe an individual has been or is at risk of abuse, or significant harm.

Staff and volunteers should:

- Be aware that they should call the police and/or an ambulance where appropriate in situations where the abuse of the individual indicates an urgent need for medical treatment, or where there is immediate risk of harm indicating urgent action is needed to protect the person.
- Be authorised to make a report to the police, and if a crime has been committed, ensure action is taken to preserve evidence. This could be where there has been a physical or sexual assault, especially if the suspect is still at the scene.

Induction and on-going Training for Staff and Volunteers

- Safeguarding induction is an integral part of the overall induction into P2C of new staff and volunteers.
- Supervision and support of all volunteers and staff will include monitoring of safeguarding practice and reviews of progress.
- The organisation will access further training and learning about safeguarding issues when these are relevant and required e.g., to update knowledge.

Advice to Staff and Volunteers When to Take Action and How

The **Designated Safeguarding Lead (DSL)** will manage any safeguarding concerns. This Person will be responsible for co-ordinating action within P2C.

All staff will report any concerns immediately or within 24 hours of the incident taking place. Reports include rumours, suspicion or firm evidence of abuse.

Vulnerable adults can potentially be abused within the family, community and organisations, by employees (including those employed to promote their welfare and protection from abuse), visitors, volunteers, and fellow learners.

Staff and volunteers must not try to investigate the matter themselves, as they are not equipped or qualified to do so.

If, following initial contact with the Designated Safeguarding Lead, it is decided that the matter should be taken further, a written report from the member of staff is essential to prevent any misrepresentation of findings, this should be sent to Designated Safeguarding Lead within 24 hours of the suspicion arising.

The report should be factual and should not include opinions or personal interpretations of the facts presented. The report should contain as much detail as possible, including any apparent physical signs of abuse or other circumstances which led to the suspicions, or the account given to the member of staff by the vulnerable adult concerned. This should be reported as accurately as possible. The report should be signed, dated and a copy stored in a secure place.

Action for Staff and Volunteers working off site at other centres

All staff and Volunteers who work off site at other centres should be clear about the reporting procedure should a disclosure be brought to their attention.

In the first instance, staff and volunteers are expected to report the disclosure to the Centre where it took place. Staff and volunteers should be aware of the Centre's policy and procedure for reporting disclosures including who is the Designated Safeguarding Person.

Disclosures should be reported to the Centre in the first instance, (followed by a written report) then a report should be made to the Designated Safeguarding Lead.

If an individual approaches a member of staff with an apparent report of abuse, the person should be listened to, using the following guidelines.

When listening to the individual staff must:

- Allow the individual to speak without interruption.
- Never trivialise or exaggerate the issue.
- Never make suggestions.
- Never coach or lead the individual in any way.
- Reassure the individual, let them know you are glad they have spoken up and that they are right to do so.
- Always ask enough questions to clarify your understanding, do not probe or interrogate – no matter how well you know the individual – spare them having to repeat themselves over and over.
- Be honest – let the individual know that you cannot keep this a secret; you will need to tell someone else.
- Try to remain calm – remember this is not an easy thing for them to do.
- Do not show your emotions – if you show anger, disgust or disbelief, they may stop talking. This may be because they feel they are upsetting you or they may feel your negative feelings are directed towards them.
- let the individual know that you are taking the matter very seriously.

- Make the individual feel secure and safe without causing them any further anxiety.

The Designated Safeguarding Lead will be responsible for recording essential information about each case and for collecting reports and notes as appropriate.

Any detailed information about a case will be restricted to the Designated Safeguarding Lead and the P2C Board of Directors, except where a referral to an external agency is to be made.

The staff or volunteer reporting the allegations will be kept informed of the progress of the case on a 'need to know' basis.

What Happens Next

Considering all the information available, Designated Safeguarding Lead will decide on the next steps, which may include taking no further action. Where the Designated Safeguarding Lead decides that further action is necessary, this may be to:

- seek further advice from Social Services
- make a referral to Social Services
- report the incident to a designated Social Worker
- report the matter to the police if a crime is suspected.

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours. Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the individual is the overriding concern. The degree of confidentiality will be governed by the need to protect the individual. The individual should be informed at the earliest possible stage of the disclosure that the information will be passed on. All conversation regarding a individual should always be held in private.

P2C complies with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect the vital interests of a vulnerable adult.

Whatever happens, staff and volunteers should always be open and honest with the individual if the case is to be taken further.

Staff and volunteers must not discuss the case with anyone other than those involved in the case. If there are any concerns about the process or progress of the case these must be discussed with the Designated Safeguarding Lead.

Allegations against Staff and Volunteers

The primary concern of P2C is to ensure the safety of the individual. It is essential in all cases of suspected abuse by a member of staff that action is taken quickly and professionally.

There are occasions where an individual may accuse a member of staff of physically or sexually abusing them. In some cases, this may be false or unfounded. In some cases, the allegations may be true.

Any instance of a vulnerable adult being abused by a member of staff or volunteer is particularly serious. On the other hand, for an innocent person to be accused of such an act is a serious ordeal, which can result in long-term damage to their health and career.

If any member of staff suspects any other member of staff of abusing a learner, it is their responsibility to bring these concerns to the Designated Safeguarding Lead.

If the allegation concerns the Designated Safeguarding Lead the matter should be discussed with P2C Director, who will follow P2C normal procedures for adult including vulnerable adults Safeguarding.

The member of staff will be advised to:

- contact their union representative if they have one.
- keep records of all conversation, meetings attended, and letters received and telephone calls relating to the allegation.

If a decision is made to pursue an allegation of abuse against a member of staff or volunteer, the Head of Operations and P2C Board of Directors will make a decision as to what action they should take with regard to the member of staff, or volunteer.

Safe recruitment of staff and volunteers

- All staff and volunteers working with vulnerable adults at P2C must send their CV and covering letter and have an interview of some kind, based on a written description of roles and duties.
- As part of our safer recruitment process each new member of staff and volunteer working with vulnerable adults is required to provide two references prior to the commencement of their employment or contact arrangements with P2C. References for all staff and volunteers are taken up in writing. All staff and volunteers must provide some additional form of identification (e.g., passport, birth certificate) which gives their full name, date of birth and current address together with signature and/or photograph.
- All P2C staff and volunteers are DBS checked prior to the commencement of their employment or contract arrangements with P2C and act according to its policies and procedures. A copy will be filed, and it will be renewed two years after it was issued.
- All staff and volunteers should be given details of this policy as part of their induction. Staff and volunteers should also have the health and safety procedures detailed to them as part of their induction. There will be an induction procedure for all staff and volunteers that includes training in knowledge and awareness of this Safeguarding Policy, and basic awareness about potential abuse.