



Safeguarding Policy

Well Grounded Jobs CIC

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WELL GROUNDED JOBS CIC

A. INTRODUCTION

Well Grounded has a duty under section 11 of the Children Act 2004 to ensure that their activities, and services provided on their behalf, are discharged with regard to the need to safeguard and promote the welfare of children. For the sake of the work we do, we follow the policy for all ages.

Well Grounded also has the responsibility to work with partners to ensure that adults, who are at risk of abuse, receive protection and support.

Well Grounded is committed to ensuring that all children and adults are protected and kept safe from harm. We have a responsibility to safeguard and promote the well-being of children and adults so that they enjoy a safe and positive environment free from harassment and bullying, however, we recognise that not all children and adults have positive experiences in their life.

We are committed to our role to promote the welfare of children and adults by encouraging good practice.

POLICY AIMS

The aims of this policy are to:

- Guide and support effective implementation of policies and procedures as well as the maintenance of systems to safeguard children and adults during Well Grounded's activities.
- Provide confidence in Well Grounded's policies and practice in respect of the safe supervision of children and adults at risk.
- Ensure that children/adults and their parents have confidence in Well Grounded policies and practices in respect of the safe supervision of children and adults at risk.
- Ensure that concerns about abuse are reported promptly to the appropriate authorities.
- Assist all employees, Apprentices, volunteers, trustees, visitors, partners and contractors involved in Well Grounded's activities to recognise and respond to the signs of possible abuse, and to protect themselves against allegations of abuse.
- Ensure that Well Grounded's role and responsibility in protecting children and adults at risk from abuse is clear.
- Raise awareness of issues and procedures around safeguarding children and adults at risk.

SCOPE OF THE POLICY

- This policy covers all employees, volunteers, trustees, partners, contractors and voluntary organisations involved in Well Grounded's activities.
- It should be readily available to all these individuals via Well Grounded's shared drive and on the website.
- Well Grounded recognises that the LSCB's (Local Safeguarding and Children's Board) Children's Social Care, Safeguarding Adult Board and the Police are the lead agencies in each region regarding child and adult protection.

- Well Grounded also recognises that everyone has a responsibility for child protection and protecting adults at risk, including all employees, volunteers, and stakeholders.
- This is a company policy. However, different service areas and venues may have specific additional policies and operating procedures that need to be adhered to when working in those particular service areas.
- Well Grounded regularly works with partners and contractors from a variety of sectors. This policy will be drawn to the attention of, and made available to, all agencies and organisations in partnership working situations.

KEY PRINCIPLES

The guidance given in this policy document is based on the following key principles:

- The welfare of children and adults at risk is the primary concern.
- All children and adults at risk, whatever their age, culture, disability, gender, language, race, religion or belief and/ or sexual orientation have the right to protection from abuse.
- All incidents of suspected poor practice and/ or allegations of poor practice should be taken seriously and responded to quickly and appropriately; this includes allegations of poor practice against employees, sub-contractors, volunteers and contractors.

ROLES AND RESPONSIBILITIES

Well Grounded reporting structure

- Well Grounded Directors, overall accountability
- CEO, Safeguarding Lead
- Head of Marketing & Partnerships, Safeguarding Manager
- Employees

1. Temporary amendments to this policy
 - When the CEO is on maternity leave, their accountabilities and responsibilities with this policy and in practice will transfer to the Interim CEO, who retains accountability for any responsibility of the Operations and Performance Director. During the maternity period, any reference to CEO, Eve Wagg should be read as Interim CEO, Mike Rogers. This temporary amendment will apply from September 2021 to September 2022 inclusive.
2. Board of Directors
 - The Well Grounded Directors are responsible for approving the Safeguarding Policy, for reviewing it and understanding their obligations, and for ensuring that the policy is reviewed regularly.
 - Safeguarding is a standing item at each Board meeting, which occurs at least every quarter.
 - Directors will receive updates on incidents, analysis of trends, training needs, and actions taken to mitigate risks associated with safeguarding.
 - Directors are responsible for ensuring that those benefiting from, or working with, Well Grounded, are not harmed in any way through contact with it.

3. Safeguarding Lead
 - CEO has overall responsibility for Safeguarding and Child and Adult Protection across Well Grounded.
 - Duties of this role include:
 - Provide oversight and leadership of safeguarding matters
 - Provide updates to Directors and ensure they are informed of and understand their obligations regarding safeguarding
 - Ensure compliance with Well Grounded's policies in the context of safeguarding
 - Ensure resource is in place to provide training and support to staff as required
 - Review and update the Safeguarding Policy.

4. Safeguarding Manager
 - Well Grounded's Safeguarding Manager is the Head of Partnerships & Communications.
 - The Safeguarding Manager supports the Safeguarding Lead, deputises as required and is responsible for coordinating action within Well Grounded and liaising with other agencies.
 - All incidents must be reported via the appropriate form on GoogleDrive to the Safeguarding Manager.
 - Reports submitted will be logged along with the report and any associated documents and follow ups on a secure site for monitoring and record retention purposes.
 - The Safeguarding Manager will ensure incidents are classified as either active or closed depending on the status and levels of support provided. They are responsible for monitoring incidents.
 - The Safeguarding Manager will source appropriate and relevant training for all staff.
 - The Safeguarding Manager should be the first point of contact regarding an incident, or to discuss a concern.
 - The Safeguarding Manager should inform their team of who the point of contact is when they are not available.
 - The Safeguarding Manager is responsible for ensuring their local contact lists are kept up to date and reflect the local context and needs.

5. Managing Director
 - The Managing Director, will complete criminal background checks for all incoming staff and retain these records in line with Well Grounded's Data Protection Policy. In her absence, the CEO, still completes these checks.
 - The Managing Director, will ensure that all visitors and volunteers will read and sign Well Grounded's (Visitors) Code of Conduct, in their absence, the Operations and Performance Director will ensure this is complete
 - The MD is responsible for the Data Protection and Online Safety policies, in their absence, the Operations and Performance Director will ensure this is complete

6. Line Managers
 - Must ensure that the Safeguarding Policy is explained to new staff as part of their induction, is understood, and implemented as required,

- Must ensure that staff submit reports in line with the policy and consult with the Safeguarding Manager or Safeguarding Lead if there are concerns regarding a participant.
 - Must implement and uphold relevant HR Policies should concerns be raised regarding a member of staff.
7. All staff
- Must provide a safe environment in which people can learn.
 - Must be aware of the systems within Well Grounded that support safeguarding.
 - Must identify concerns early and provide help for children and adults at risk, to prevent concerns from escalating. Well Grounded and their staff form part of the wider safeguarding system for children and adults at risk. This system is described in statutory guidance [Working together to safeguard children](#).
 - Well Grounded will work with social care, the police, health services and other services to promote the welfare of children and adults at risk to protect them from harm.
 - Must be aware of their local early help process and understand their role see [Working together to safeguard children](#).
 - Should be aware of the process for making referrals to Children social care and for statutory assessments under the Children Act 1989's section 17 (Children in need) and Section 47 (Child at risk of significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
 - Must provide detailed and accurate reports of all incidents which must be submitted via the online form.

CONTRACTORS AND PARTNERS

Voluntary, private, employer and community sector providers working in partnership with Well Grounded involving children and adults at risk will be made aware of the Well Grounded's Safeguarding Policy. Organisations that are grant aided will be encouraged to develop an appropriate policy as a condition of financial support.

Contractors will be expected to follow this policy unless they have their own policy, which has been recognised as an adequate substitute. The principles of safe recruitment will, therefore, be included in the terms of any contract drawn up between Well Grounded and contractors or agencies that provide services for, or adults to work with, children and adults at risk during the provision of our services.

Well Grounded will monitor compliance with the contract that will also include a requirement that the provider will not sub-contract to any personnel who have not been part of a safe recruitment process.

B. SAFEGUARDING AT WELL GROUNDED

- Well Grounded is a community interest company supporting adults at risk into employment in the coffee industry.
- Our activities include:
 - Classroom-based group activities and workshops, including discussions, mock interviews, individual work (e.g. preparing CVs, cover letters).
 - Technical activities in group settings, (e.g. working on coffee machines)
 - One-to-one support to help people prepare and review action plans, set goals and measure their individual progress both virtually and face to face.
 - Online technical training and support.
 - In-work activities such as work placements, world of work visits, job trials, and employment (with and without training).
- Well Grounded supports a diverse range of people (aged 18 to 60 years) from disadvantaged communities who face a range of complex socio-economic barriers. Experiences and circumstances that might make our trainees particularly vulnerable include: Experience of abuse, living in care, the criminal justice system or homelessness, having learning difficulties, poor mental or physical health, being refugees/asylum seekers or fleeing violence (e.g. domestic, gang-related).
- We recognise and value diversity. We also recognise and seek to redress inequality and disadvantage – as an employer, service provider and in partnership with third parties.
- We aim to provide the services and support needed by each trainee, developing personal learning plans for each learner.

RECRUITMENT, TRAINING & DEVELOPMENT

Well Grounded will take all reasonable steps to prevent unsuitable people from working with children and adults. In particular, it will:

- Ensure all staff with responsibility for recruitment and selection are trained.
- The manager will evaluate the need for Disclosure and Barring Service (DBS) for all vacancies/ new posts
- As appropriate, ensure experience of working with children, young people and adults (and also cover any apparent gaps in employment history at interview).
- Confirm the identity of the prospective appointee. This will normally be done at interview stage. This information can then be cross-checked with the information required for the DBS check.
- All new Well Grounded employees will complete the NSPCC level 1 safeguarding Accreditation.
- Well grounded board members will complete the NSPCC safeguarding for governors/trustees Accreditation.
- Take up two references (one from current or most recent employer) and, as appropriate, enhanced disclosure check from DBS, prior to commencement of appointment. (There are sometimes difficulties in getting DBS checks back quickly, manager's may very often have to risk assess the situation. For example, can the individual be closely supervised until the DBS check is received or can the job be restructured, to remove the risk until the DBS check is received).

- Complete regular monitoring during a new employees probationary period.
- Well Grounded will ensure that all employees who come into contact with children and adults will be DBS checked on a 3-yearly basis. This is to ensure that employee's records are current and up-to-date.
- Well Grounded has a responsibility to ensure all new employees undertake an induction programme. As part of this induction programme, Well Grounded will ensure employees are made aware of and understand their responsibilities in respect of its Safeguarding and Prevent Policies.
- Well Grounded will provide regular updates to training annually and when there are changes to external policies and or guidance that will require a change to practice.

WORK EXPERIENCE PLACEMENTS

Before a young person or adult at risk commences in a placement or work experience, managers will need to make sure that they have followed the guidelines in the work experience policy and procedure.

HEALTH AND SAFETY

- Under health and safety law, Well Grounded has the same legal responsibilities for the health, safety and welfare of young people and/ or adults, as its employees.
- Protecting the health and safety of young people and adults must be done in such a way that it complies with Well Grounded's legal responsibilities but at the same time does not restrict the young person or adult at risk's rights to autonomy, privacy or dignity.
- The management of Health and Safety at Work Regulations Act, 1999; requires that young people and adults are protected from risks to their health and safety taking into account that they may be:
 - Inexperienced
 - Have not been trained; and
 - May not pay enough attention to health and safety.
- Risk Assessments will be carried out for all activities involving young people and adults before they start in employment, on work experience. The risk assessment will determine the level of supervision the young people or adult at risk requires.

See Management System/Health & Safety Policies for further guidance.

HANDLING ALLEGATIONS

- When collecting and recording details relating to concerns or an allegation, it is important for staff to distinguish between fact, hearsay and opinion.
- Opinions expressed should only be those relevant to the situation being reported and remain respectful and appropriate in tone.

This will vary depending on whether the concern is around welfare or criminality

COMMUNICATION

Concerns about welfare:

- If you have concern about welfare this information would be reported to Social Work Services. Most local authorities have a single point of access. You would ask the authority to put you through to a duty worker regarding the welfare of a child / adult. You would collate information and pass this on. The term welfare is wide, but it looks at risk and if someone is safe from harm.

Concerns about criminality:

- Information about criminality should be passed onto Police. Thereafter the Police would contact Social Work by the way of a Police concern report.

TALKING TO PARENTS/CARERS

- In the majority of cases it is good practice to be open and honest at the outset with parents/carers about the concerns, the possible need for a referral, and information sharing between agencies. Where appropriate, all reasonable efforts should be made to inform parents / carers before making a referral. However, an inability to inform them should not prevent a referral being made.
- There are cases where it will not be appropriate to discuss concerns with parents/carers before referral. In such situations, the timing of contact with parents/carers will be agreed with MASH and/or the Police once the referral has been made.
- Situations where it would not be appropriate to inform family members prior to referral include where:
 - Discussion would put a child at additional risk of Significant Harm;
 - There is evidence to suggest that involving the parents/carers would impede the Police investigation.
 - Sexual abuse is suspected or it is suspected that a parent is involved in the sexual exploitation of a child;
 - Organised or multiple abuse is Fabricated or induced illness is suspected
 - To contact parents/carers would place them or others at risk;
 - Discussion would place one parent at risk of harm e.g. in cases of domestic abuse;
 - It is not possible to contact parents/carers without causing undue delay in making the referral;
 - Where there are concerns about possible illegal procedures or events such as Female Genital Mutilation (FGM) or forced marriage.
- Reasons for not informing the family of the referral must be documented, as must the conversation and outcome of any advice sought.

INFORMATION EXCHANGE & CONFIDENTIALITY

- Well Grounded regards confidentiality as an essential responsibility of all its employees, board members, partners and volunteers.
- This is set out in their respective codes of conduct and contracts.
- When sharing information, Well Grounded does so with due consideration of relevant legislation and its Data Protection Policy. Decisions pertaining to

information sharing (relevant to safeguarding) should prioritise the safety and wellbeing of the individual and be underpinned by the following principles:

- Data sharing is necessary
- Data sharing is proportionate
- Data sharing is relevant to the situation
- Data sharing is adequate
- Data sharing is accurate
- Data sharing is timely
- Data sharing is secure
- The individual's consent should always be sought prior to reporting abuse. However, a lack of consent should never compromise the safety or welfare of a child or adult at risk. Consideration should be given as to why consent is being withheld in line with their human rights. Written consent should be sought when possible and submitted as part of the paperwork to the Safeguarding lead alongside the incident report.
- The decision to share confidential information without the individual's consent should be agreed with the Safeguarding Lead, in advance when time allows. These decisions should be recorded, signed by the relevant parties and saved on Well Grounded's secure GoogleDrive by the Safeguarding Lead.

DATA PROTECTION

- In line with General Data Protection Regulation (GDPR) 2018, the Human Rights Act 1998, and the Freedom of Information Act 2000 Well Grounded's Data Protection Policy sets out all employees' statutory obligation to protect confidentiality of personal information.
- Well Grounded will comply with requests made under the Children Act 2004. Such a request must meet certain conditions, which will be ensured by the Safeguarding Lead by verifying the legislation.
- Any potential or actual data breach relating to safeguarding data will be handled under the procedures set out by Well Grounded's policy and, as required, guidance from the Chair of Well Grounded
- Safeguarding incident records will be retained for 15 years and securely destroyed thereafter.

DEFINITIONS

- **Child(ren):** Individual(s) who have not yet reached their 18th birthday.
- **Adults at risk:** Any person aged 18 or over who:
 - has needs for care and support (whether the local authority is meeting any of those needs)
 - is experiencing, or at risk of, abuse or neglect
 - as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
- Abuse is a form of maltreatment of a child or adult that is vulnerable/at risk. Somebody may abuse or neglect a child or adult at risk by inflicting harm, or by failing to act to prevent harm. For further information on the types of abuse and neglect see Appendix C.
- Forms of Abuse: There are four forms of abuse defined for children or adults at risk. These are physical abuse, sexual abuse, neglect and emotional abuse.

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to an individual. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse: the persistent emotional maltreatment of a child or adult at risk such as to cause severe and adverse effects on the individual's emotional development. It may involve conveying to a child or adult at risk that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the individual opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on individuals. These may include interactions that are beyond an individual's developmental capability as well as overprotection and limitation of exploration and learning or preventing the individual from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing individuals frequently to feel frightened or in danger, or the exploitation or corruption of individuals. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.
- Sexual abuse: involves forcing or enticing a child or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or adult at risk is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving individuals in looking at, or in the production of, sexual images, watching sexual activities, encouraging child or adult at risk to behave in sexually inappropriate ways, or grooming a child or adult at risk in preparation for abuse.
- Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- Neglect: Persistently failing to meet the basic physical and/or psychological needs of a child or adult at risk 4.5.6 An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period but can also be a one-off event. Abuse and neglect can have major long-term impacts on all aspects of a child's health, development and well-being.

Forms of Abuse: Adults

- In adults, there are ten definitions of abuse. These are physical abuse, domestic violence, sexual abuse, psychological abuse, financial or material abuse, modern slavery, discriminatory abuse, organisational abuse, neglect and acts of omission, and self-neglect. For further guidance see: <https://www.england.nhs.uk/wpcontent/uploads/2017/02/adult-pocket-guide.pdf>

- 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, cyber crime, postal and doorstep crime, 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. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- Discriminatory abuse: includes 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 or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- 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.
- 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.

PREVENTING RADICALISATION & EXTREMISM

- See Well Grounded's PREVENT Policy.
- Well Grounded follows the Home Office guidance:
<https://www.gov.uk/government/publications/prevent-duty-guidance>

RESPONDING TO NON-RECENT ABUSE

- Non-recent child abuse, sometimes called historical abuse, is when an adult was abused as a child or young person under the age of 18

- Participants might choose to disclose this to a Well Grounded employee. This might be their first time sharing this information.
- Staff should first understand whether any present or immediate danger exists to that individual. If so, they should follow the procedure set out in APPENDIX F.
- Recognising that the nature of each incident of non-recent abuse will vary and potentially have different implications (e.g. online or offline abuse, ongoing risk to other people, incidents attached to high profile cases such as historic abuse at football clubs) we will approach each in a considered and bespoke way.
- Staff should in the first instance speak with the Safeguarding Manager. They will liaise with the staff member and, as appropriate, the Safeguarding Lead, trainee and external agencies to understand the context of that specific report.
- Recording, storing and sharing this information should follow the same principles and guidance set out in this policy.

C. RESPONDING TO AND REPORTING ABUSE

Do;

- Be accessible and receptive
- Listen carefully
- Take it seriously
- Reassure the person they were right to tell
- Say what will happen next
- Consult immediately with the designated Safeguarding Manager
- Make a careful record of what was said

Don't;

- React strongly e.g. "that's terrible"
- Jump to conclusions especially about the abuser
- Speculate or accuse anybody
- Tell them you will keep their secret
- Ask leading questions
- Make promises you cannot keep
- Stop them from speaking freely
- Tell them to stop talking so you can fetch someone else

GUIDELINES FOR DEALING WITH AN INCIDENT

- **The individual's consent should always be sought.** However, a lack of consent should never compromise the safety or welfare of a child or adult at risk. However, consideration should be given to why consent is being withheld in line with their human rights. Written consent to share information should be sought wherever possible.
- Well Grounded employees are not expected to be experts at recognising such situations, but employees do have a responsibility to act if they have concerns about the behaviour of an adult or child, towards a child or adult at risk. All employees have a duty to discuss any concerns they may have about the welfare of a child or adult at risk with their line manager or another appropriate senior member of staff as soon as possible.
- Staff must in the first instance follow Well Grounded's policy and report the incident to their Safeguarding Manager, or the Safeguarding Lead.
- Staff may also share information directly with NSPCC, LSCB's Children's Social Care or LSCB's Adult Social Services and the Police if the situation is an emergency and/or they are unable to contact a Safeguarding Manager or the Safeguarding Lead.
- In all incidents you must take necessary action to protect the child or adult, the relevant action can be discussed with the Safeguarding Manager.
- Secure handling and storage of people's files should be treated as highly confidential and in line with Data Protection Policy.
- You can call Careline on 233 3800 or contact the local police or dial 999 in an emergency.

INTERNAL REPORTING PROCEDURE:

Reporting Procedure - See Appendix F

- Employees responding to a suspicion of abuse or poor practice should complete the Incident report with input from the Safeguarding Manager (or appointed cover).
- The incident report should be submitted within 24 hours to the Safeguarding Lead by the Safeguarding Manager.
- The report will be acknowledged, and a decision made by the Safeguarding Lead about what appropriate action needs to be taken.
- If the Safeguarding Manager is unsure about whether to refer, they should ring the Local Safeguarding Children's Board Area Office (Monday to Friday 8am to 8pm and Saturday 9.30am to 4pm) and discuss their concerns. Contact numbers can be found on line. If outside of these hours contact Social Services emergency duty team. In an emergency, telephone the Police on 999. .

What happens if you feel an incident hasn't been handled appropriately?

- Any concerns or issues with the handling of an incident should be escalated through the levels of the Safeguarding Reporting Structure as outlined in Section A.

GUIDELINES FOR PHOTOGRAPHY AND FILMING

- Well Grounded's Data Protection Policy sets out the procedures for obtaining permission and safe storage of images/videos of participants.
- Well Grounded dates all photography and after five years photos and stops publishing new content containing these images.
- Videos and images that are being taken to share with the press/partners should have additional consent for this use. This can be obtained using the Photography and Case Study Consent Form.
- The following guidelines apply to photographers:
 - The photographer should be sensitive to other users/participants and as far as reasonably possible restrict the images taken to those of the subject(s)
 - If at any time another user in the area where the photographs are being taken complains about the activity, then the photography or filming must stop immediately
 - No matter what arrangements are put in place to prevent the misuse of cameras, videos or mobile phones with digital image recording, the nature of "peeping tom" type activity or "Up-skirting" make it very difficult to police. In recognition of this, Well Grounded asks users of their facilities to be alert to any suspicious activity, particularly where children and adults may be involved and encourages them to report any such incidents or concerns at the earliest opportunity to a Well Grounded employee.

ALLEGATIONS AGAINST EMPLOYEES

Any concerns about the welfare of a child or adult at risk arising from alleged abuse or harassment by an employee of Well Grounded must be reported immediately. It can often be difficult to report a fellow employee, but Well Grounded assures all employees that it will fully support and protect anyone who, without malicious intent reports their concerns about a colleagues practice or the possibility that a child or young person may be being

abused or harassed. Well Grounded's Whistle blowing Policy and procedure, enables and encourages employees to raise any concerns that they have about malpractice, abuse or wrongdoing at an early stage and in the right way, without fear of victimisation, subsequent discrimination or disadvantage.

Types of investigation

If there is an allegation about an employee, there may be three types of investigation.

- Criminal
- Child Protection
- Disciplinary

Civil proceedings could also be taken by the person or family who alleged the abuse or harassment.

Action to be taken if there are concerns about a Well Grounded employee:

If the concern or allegation is clearly regarding poor practice then the line manager and appropriate senior manager should deal with it as a misconduct issue and follow Well Grounded's Disciplinary Procedure. Where it is suspected that abuse has taken place the following should happen:

- Any suspicions that an employee has abused a child or adult at risk should be reported to the CEO
- The CEO will then seek advice from the LSCB's children's Social Care or LSCB's Adult Social Services, who may then involve the Police. If the incident is out of hours the report should be made directly to the Police.
- The Disciplinary Procedure will then be followed.

SUPERVISION and ABSENT PARTICIPANTS

Supervision

It is Well Grounded's policy that:

- Anyone under the age of 18 years should be considered as a child and to ensure that Well Grounded staff and participants are provided protection and are aware of best practice so that "children" or adults at risk in their care can be protected and that they do not place themselves in an unnecessarily vulnerable position.
- All participants under the age of 18 or adults at risk are supervised at all times whilst in or on academy premises and their whereabouts accounted for.
- Registers are completed at the beginning of and end of each learning session, whether in-person or online.
- Risk assessments are completed for all external activities. The aim is to assess any risks that might occur during the activity, the likelihood of their occurrence and the steps that can be taken to manage the risk.

Absent Participants

A participant may reasonably be considered to be potentially missing/Absent when their whereabouts are not known and unexplainable for a period of time that is regarded as

unusual in consideration of the participant's normal behaviour patterns, plans and routines. You must review the participant's attendance records and discuss with your line manager if you believe them to be absent.

- Report concerns to the line manager in the first instance and record in the ILP
- Unexplainable absences must be reported to a Safeguarding Manager

Action to be taken in all absences short or for longer periods:

- All absent participants must be contacted if their absence from the academy/session cannot be explained
- Attendance records/timesheets must document the actions and/ or whether contact has been made and by whom
- Participants should not miss a scheduled commitment unless they have authorisation from a member of staff to be absent. It is the participant's responsibility to communicate effectively with the delivery staff in respect of all absences. The delivery team have a responsibility to ensure the participant catches up on any work and guided learning hours they have missed.
- Dealing with poor attendance and punctuality Well Grounded will contact all participants, parents/carers whose attendance or punctuality is causing a concern. Participants whose attendance or punctuality is causing concern will be set clear targets for improvement and will be supported to achieve these. Targets will be reviewed frequently.

Absence also refers to when a participant has left a session earlier than the scheduled finish time. In this instance the following procedure must be applied:

- Contact the participant, If the participant cannot be contacted
- Contact parent/carer
- Record all contact

HANDLING OF DIFFICULT SITUATIONS

There may be situations when individuals pose an immediate risk to others, property or themselves.

Where dialogue and diversion tactics fail there are two types of simple control methods that can be used.

- Simple physical presence as control. This involves no contact e.g. standing in front of an exit.
- Holding or touching to persuade a child, young person or adult at risk to comply with verbal requests e.g. holding a person's hand or using the shoulders to steer a person away from a situation.

If a situation is approaching the point where these methods will not or don't work or if the person is threatening or using violence then the police should be contacted immediately.

Set procedures must be applied if these control methods are used (please see APPENDIX D).

GUIDELINES FOR ONLINE SAFETY

- As Well Grounded increasingly works online, it is essential that our participants are safeguarded from potentially harmful and inappropriate online material. We ensure appropriate filters and appropriate monitoring systems are in place through our ICT supplier, as set out in our ICT Equipment Policy.
- Where Well Grounded uses the ICT facilities of another provider (e.g. library, school, community centre) the venue risk assessment should consider and review that they have appropriate filters and monitoring systems in place.
- Well Grounded's existing policies around safeguarding, health and safety concerns, and usual reporting methods to Designated Safeguarding Lead remains in place in a digital setting.
- Any 121 conversations with individuals that are deemed as high risk should be recorded if possible.
- Review the Well Grounded 'online safety procedures' policy.

For further assistance and guidance on online safety issues not covered here, the [UK Safer Internet Centre Helpline](https://www.saferinternet.org.uk/helpline) can provide support and advice at helpline@saferinternet.org.uk or telephone on 0844 3814772. Online safety concerns regarding children should be reported to [Child Exploitation and Online Protection](https://www.nspcc.org.uk/keeping-children-safe/child-exploitation-and-online-protection/).

FURTHER INFORMATION

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for Training Providers and colleges can be found on the [Foundation Online Learning](https://www.foundationonlinelearning.org/) website and [NSPCC](https://www.nspcc.org.uk/) website.

CONTACT DETAILS

Safeguarding Lead at Well Grounded – Mike Rogers, 07519 463652
Safeguarding Manager at Well Grounded - Darshika Ravindran, 07826 969776

Overall Safeguarding responsibility whilst delivering activity at Spotlight lies with Poplar HARCA. For all students enrolled on training at Spotlight, Poplar HARCA have overall accountability for safeguarding. Contact details:

Spotlight (young people): Daniel Rose, [020 3011 1333](tel:02030111333)
Poplar HARCA (adults): Chelsea Kelly, 020 7510 0571

Local Agencies & Authorities

Each Local Authority area in Scotland, England and Wales will have a Local Safeguarding Children Board (LSCB). The lead agency with the statutory responsibility for Safeguarding is Social Work Services who will usually chair this committee. Every area has a Children's Trust which is responsible for the wider planning and delivery of services. The contact details of relevant bodies that

may need to be contacted, when reporting concerns or allegations externally, should be held locally and kept up to date. You need to report to the LA where the individual lives. Not where the Academy lies.

National Agencies

NSPCC Helpline	0808 800 5000 help@nspcc.org.uk
Childline	0800 1111
Churches Child Protection Advisory Service	0845 120 4550
Disability Rights Commission Helpline (DRC)	08457 622 633 / 08457 622 644
Domestic Violence Helpline	0808 2000 247
The Forced Marriage Unit	020 7008 0151 Emergency Duty Officer (out of hours): 020 7008 1500 www.fco.gov.uk/forcedmarriage
Muslim Youth Helpline	0808 808 2008
Rape Crisis	0808 802 9999 www.rapecrisis.org
Refuge – Domestic Abuse	0808 200 247

Mental Health	
MIND	0845 766 0165 www.mind.org.uk
Relate	www.relate.org.uk
Parentline Plus (confidential and anonymous helpline for parents on any parenting issue)	020 7284 5500 0808 800 2222
SANE	0845 767 8000 (12 noon – 2am) www.sane.org.uk
Samaritans	08457 90 90 90
Bereavement Advice and Support	www.survivingsuicide.com

	www.crusebereavementcare.org
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Sexually Transmitted Infections	
National Aids/HIV helpline	0800 567 123
Terrence Higgins Trust	0845 1221 200 www.tht.org.uk

Sexuality	
Bisexual helpline	0181 569 7500
Stonewall	www.stonewall.org.uk

Conception, Pregnancy and Sexual Health	
Brook Advisory Centres	0800 0185 023 www.brook.org.uk

Drugs and Alcohol	
Al-Anon and Alateen	0171 0 0888
Alcohol and drugs support	www.adfam.org.uk

Eating Disorders	
Eating Disorders Association	01603 619 090

Bullying	
Kidscape	08451 205 204 www.kidscape.org.uk

APPENDIX A: SHARING INFORMATION

Key Points for sharing information:

Staff should explain to the child, adult at risk and parent at the outset, openly and honestly, what information will, or could be shared. They should explain how, and why, it needs to be shared, and seek their agreement. The exception is where to do so would put the person or others at risk of significant harm, or undermine prevention, detection or prosecution of a serious crime including where seeking consent might lead to interference with a potential investigation. Staff must always consider the safety and welfare of a child or adult at risk when making decisions on whether to share information about them. Where there is concern that the person may be suffering or is at risk of significant harm, the individual's safety and welfare must be the overriding consideration.

Staff should, wherever possible, respect the wishes of children, adults or their parents who do not consent to share confidential information. Staff may still share information, if in their judgement on the facts of the case; there is sufficient need to override that lack of consent.

Staff should seek advice from the appropriate professional bodies where they are in doubt, especially where their doubt relates to a concern about possible significant harm to a child, adult at risk or to others.

Staff should ensure that the information they share is accurate and up-to- date, necessary for the purpose for which they are sharing it, shared only with those people who need to see it and shared securely.

Staff should always record the reasons for their decision-whether it is to share information or not.

Obtaining Consent

The individual's consent should always be sought. However, a lack of consent should never compromise the safety or welfare of a child or adult at risk. However, consideration should be given to why consent is being withheld in line with their human rights. Written consent to share information should be sought wherever possible.

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

1. The situation is an emergency and the Designated Safeguarding Lead, line manager and Chief Executive are all unavailable
2. They are convinced that a direct report is the only way to ensure the individual's safety
3. For any other reason they make a judgement that direct referral is in the best interests of the child or adult at risk.

APPENDIX B: GLOSSARY

- **Adult at risk:** An adult at risk is a person: '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 take care of him or herself, or unable to protect him or herself against significant harm or exploitation.' The term 'vulnerable adult' has been replaced with the term 'adult at risk' in this policy and procedure.
- **Adult Social Care:** The provision of social work, personal care, protection or social support services to adults at risk, or adults with needs arising from illness, disability, old age or poverty.
- **Designated Officer for the Local Authority (DOLA):** The Designated Officer for the Local Authority provides advice and guidance to employers and voluntary organisations, liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.
- **Discriminatory abuse:** Includes racist and sexist abuse, abuse based on a person's disability, their gender or sexuality, and other forms of harassment, slurs or similar treatment.
- **Education:** Means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies and pupil referral units.
- **College:** means further education colleges and sixth form colleges as established under the Further and Higher Education Act 1992 and relates to their responsibilities to children under the age of 18 and training providers.
- **Employees:** Those employed by Well Grounded, its sub-contractors, as well as volunteers involved in the delivery of learning activities or in its premises or facilities. Contractors should also meet these guidelines or have their own arrangements, which meet the requirements of this policy. Financial or material abuse Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. Institutional abuse This is where repeated incidents of poor care have become the norm and/or where there is a tolerance of clearly unacceptable behaviour and attitudes.
- **Multi-agency public protection arrangements MAPPA:** is a multi-agency planning process co-ordinated by the police for offenders who constitute a high risk to the public and are not detained in custody. Local authority County, city, district and borough councils. Find your local council - GOV.UK
- **Multi-Agency Safeguarding Hub (MASH):** Is the single point of contact for all safeguarding concerns regarding children and young people in England. It brings together expert professionals from services that have contact with children, young people and families, and makes the best possible use of their combined knowledge to keep children safe from harm.
- **Neglect and acts of omission:** Includes ignoring medical or physical care needs, failure to provide access to appropriate help, social care or educational services. Or the withholding of the necessities of life, such as medication, adequate nutrition and heating. Non-recent child abuse Sometimes called historical abuse, is when an adult was abused as a child or young person under the age of 18. Physical abuse Includes hitting, slapping, pushing, kicking, scalding, burning with cigarette ends, and misuse of medication, restraint, or inappropriate sanctions.

- Psychological abuse: Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- Safeguarding: Any activity that protects someone from harm or abuse. It includes, but is not exclusively concerned with, adult and child protection. A public awareness campaign that tries to increase older people's awareness of the risks associated with letting cold callers into their home is an example of the broader safeguarding agenda. Protection is where a plan needs to be put in place to protect an adult at risk from abuse or neglect.
- Serious Adults Review (SAR): Safeguarding adult's boards can commission a detailed review into the multi-agency involvement of organisations working with an adult at risk who dies or comes to serious harm.
- Sexual abuse: Includes rape and sexual assault or sexual acts to which the adult at risk has not consented, or could not consent or was pressured into consenting.

APPENDIX C: RECOGNITION OF ABUSE AND BULLYING

Indicators of abuse

The following are some of the common factors which may signal that there is danger of abuse occurring/having occurred. Considerable caution should be exercised when referring to these indicators as they do not automatically indicate a potentially abusive situation, but sometimes warrant investigation by local authority adult care social services departments, especially where multiple combinations or signs are present. Expert assessment and advice in individual situations can be sought from local authority safeguarding adults/adult protection leads

Predisposing factors which may lead to abuse

- Increased dependency of the individual, leading to a high degree of care being required.
- Multiple dependencies within the family, e.g. young mother having to care for an older relative.
- Multi-generational family structure where there are conflicts of personal interests and personal loyalties.
- Where roles have been reversed, e.g. a domineering parent becomes dependent.
- History of abuse within the family, e.g. domestic violence, abuse of children.
- Overcrowding or poor housing conditions//financial difficulties – low income, debts.
- Adult has difficult behaviour which causes high levels of stress for other people, e.g. has hit/abused others, disturbs others at night, and exhibits odd or embarrassing behaviour.
- Other members of the family have ill health (physical or mental) or there may be alcohol or drug dependency.
- There are personal problems within the person's household, e.g. marital, financial.
- Carers are isolated due to the demands of caring and lack practical or emotional support.
- Carers may not have the necessary understanding of the person's condition to enable them to offer appropriate and effective care.

Some possible signs of abuse

Financial abuse is the main form of recorded abuse amongst adults. Financial abuse can occur in isolation or, as research has shown, where there are other forms of abuse, (e.g. sexual, psychological/emotional abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supporting networks). Neglect and acts of omission include ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, or the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Research has shown that neglect is the most prevalent form of abuse of older people in the UK, with financial abuse a close second.

Discriminatory abuse includes that which is based on a person's disability, age, race, gender, sexual orientation and/or other forms of harassment, slurs or similar treatment.

Financial or material abuse can range from failure to access benefits, to inadvertent mismanagement and opportunistic exploitation, to deliberate and targeted abuse, often accompanied by threats and intimidation.

It may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, overcharging or carrying out unnecessary work, or the misuse or misappropriation of property, possessions or benefits.

Common signs of financial abuse

- Unexplained or sudden withdrawals of money from accounts
- Disparity between assets and satisfactory living conditions
- Lack of receptivity to assistance requiring expenditure when finances aren't a problem
- Extraordinary interest by family members or other people in the vulnerable person's assets
- Power of attorney obtained when the person is not able to understand the purpose of what they are signing
- Recent change of deeds or title of property
- Carer apparently only interested in the person's financial affairs and not in their care
- The person who manages the financial affairs is evasive or unco-operative
- Reluctance/refusal to take up care assessed as being needed
- A high level of expenditure without evidence of the person benefiting
- The purchase of items which the person does not require or use
- Personal items going missing from the home
- Unreasonable or inappropriate gifts

Common signs of physical abuse

- History of unexpected falls or minor injuries
- Bruising, finger-marks
- Burns
- Injuries/bruising at different states of healing
- Injury shape similar to an object
- Injuries to face/scalp
- History of 'hopping' between agencies or GPs, or reluctance to seek GP help
- Weight loss
- Rapid weight gain
- Subdued personality in presence of carer
- Ulcers, bed sores and being left in wet clothing
- Drowsiness due to too much medication
- Lack of medication, causing recurring crises/hospital admissions

Common signs of neglect

- Physical condition is poor, e.g. bed sores, unwashed, ulcers
- Clothing in poor condition, e.g. unclean, wet, ragged
- Inadequate diet or malnutrition
- Untreated injuries or medical problems
- Inconsistent or reluctant contact with health or social care agencies

- Failure to engage in social interaction
- Refusal of access to callers/visitors
- Inadequate heating
- Failure to give prescribed medication or appropriate medical care
- Poor personal hygiene

Common signs of social and emotional abuse

- Isolation, e.g. being confined to one room and denied social contact
- Unkempt, unwashed, smell of urine/faeces
- Inappropriately/improperly dressed
- Individual may be withdrawn, agitated, anxious
- Change in appetite leading to unusual weight gain/loss
- Insomnia/sleep deprivation or need for excessive sleep
- Tearfulness
- Unexplained paranoia
- Low self-esteem
- Excessive fears
- Confusion
- Agitation

Common signs of sexual abuse

- Partial disclosure, e.g. the person uses repeated phrases like “it’s a secret” or “shut up, or I’ll hurt you”
- Medical/physical problems such as genital infections, love bites, bruising
- Disturbed behaviour such as sudden withdrawal from activities, loss of previous skills, loss of appetite or difficulty keeping food down, sleeplessness or nightmares, inappropriately seductive behaviour, self-injury
- Behaviour of others – the way someone else behaves, talks to or touches the person

Common signs of discriminatory abuse

- Lack of respect shown to an individual
- Signs of a sub-standard service being offered to an individual
- Repeated exclusion from rights such as health, education, employment, criminal justice and civic status
- Hate mail
- Verbal or physical abuse in public places or residential setting

Common signs of institutional abuse

- Inappropriate or poor care
- Misuse of medication
- Inappropriate use of restraint
- Sensory deprivation, e.g. denial of use of spectacles or hearing aid
- Lack of respect shown to the adult at risk
- Denial of visitors or phone calls
- Restricted access to toilet or bathing facilities
- Restricted access to appropriate medical or social care
- Failure to ensure appropriate privacy or personal dignity

- Lack of flexibility or choice, e.g. mealtimes and bedtimes, choice of food
- Lack of personal clothing or possessions
- Controlling relationship between staff and service users
- Poor professional practice

APPENDIX D: GOOD PRACTICE GUIDELINES

Examples of how we to create a positive environment when working with children and adults:

- Work in an open environment, avoid private or unobserved situations
- Treat all children and adults with equal dignity and respect
- Put the welfare, success and achievement of each child first, before the winning or achieving of goals
- Make activities enjoyable and promote fair play
- Maintain a safe and appropriate distance with children and adults
- If physical contact is necessary for demonstrating skills etc, explain and discuss these actions with the person first
- Recognise that caution is required especially when dealing with sensitive moments e.g. when dealing with bullying, bereavement or abuse
- Keep up to date with technical skills, qualifications and insurance requirements
- Be an excellent role model, this includes not drinking alcohol or smoking in the company of children and adults in any work related environment
- Give constructive feedback rather than negative criticism
- Recognise the development needs of children and adults and avoid excessive training or competition.

Things to avoid:

You should NEVER allow or take part in any of the following:

- Engage in rough physical or sexually provocative games
- Engage in or allow any form of inappropriate touching
- Allow children and adults to use inappropriate language unchallenged
- Make sexually suggestive comments to a child, even in fun
- Reduce a child, young person or adult at risk to tears, as a form of control
- Allow allegations made by a person to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature for a child, young person or adult at risk that they can do for themselves including things like applying sun cream
- Transport or take children, young people or adults to their home unsupervised
- Administer medication unless specifically trained and approved by the person's parents to do so
- Take a child or adult at risk to the toilet unsupervised.

The list is not exhaustive. Some specific posts and activities may need more detailed guidance. If employees have any concerns about the appropriateness of any practice or action, they should contact their line manager where possible or a senior manager.

APPENDIX E: HANDLING DIFFICULT SITUATIONS

Handling Difficult Situations – Control

Two types of simple control methods can be used in order to prevent injury to the child or adult at risk, other children and adults or significant damage to a property. Simple physical presence as a control involves no contact e.g. standing in front of an exit. Holding or touching to persuade a child or adult at risk to comply with verbal requests e.g. holding a person's hand or using the shoulders to steer a person away from a situation. Wherever possible, steps should be taken in advance to avoid the need for these control methods through dialogue and diversion. If a situation is approaching the point where these methods will not or do not work or if the person is threatening or using violence then the Police should be contacted immediately. If other children or vulnerable people are present in the area, they should, if possible be moved away from the situation.

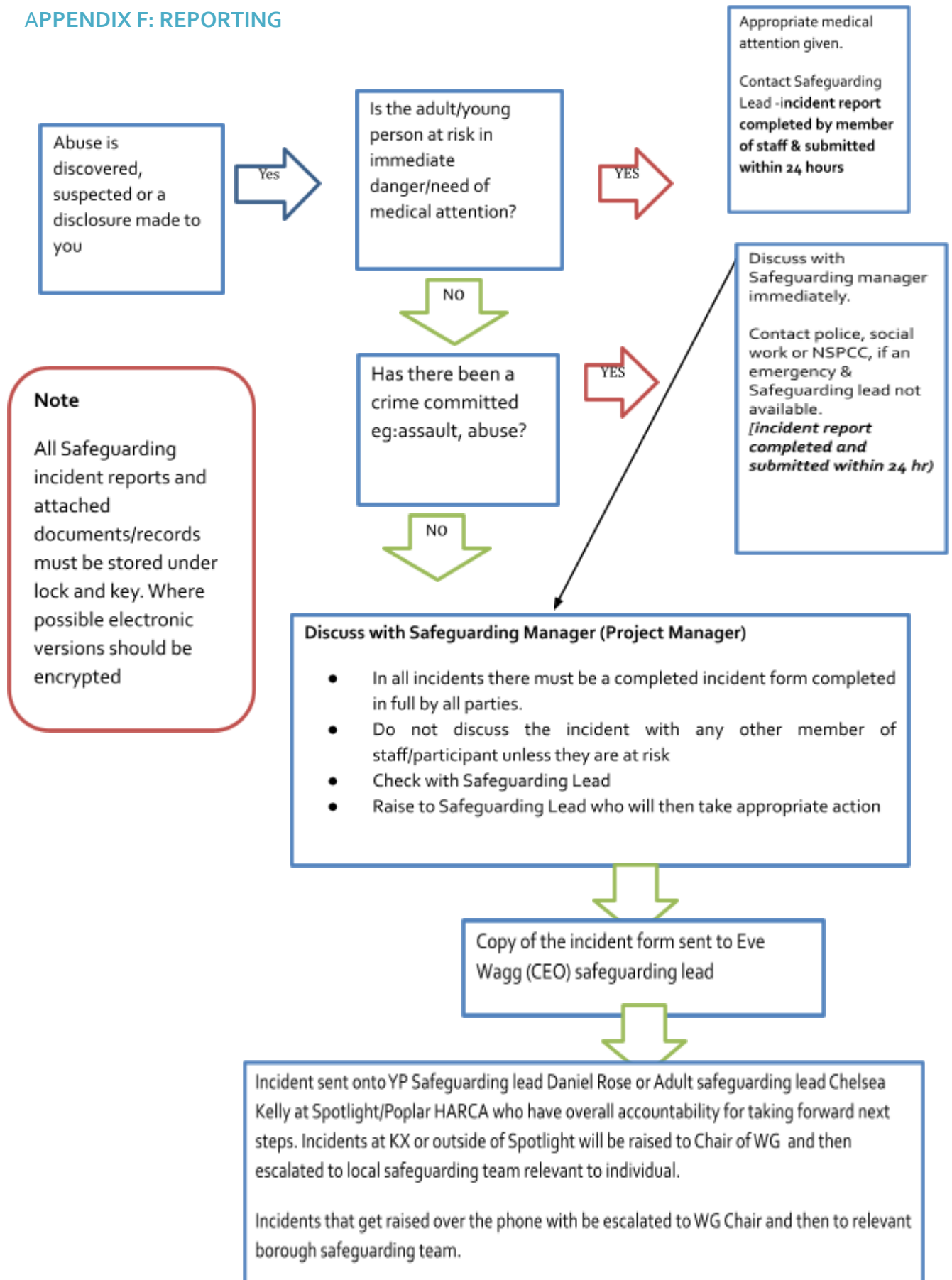
Procedures to be followed if these control methods are used:

- Notify your line manager immediately after the incident has occurred.
- Complete an accident report form and send this to your line manager and the Health and Safety Officer.

Line managers should then:

- Ensure the report is comprehensive
- Ensure that the parents of the child or adult at risk are informed of the incident and provided with a copy of the report
- Arrange a meeting to discuss the incident with the employee within 24 hours of the incident if possible
- Write up the meeting with the employee and obtain the employee's signature to the accuracy of the discussion notes
- Keep all records of the incident in a secure locked cabinet
- Ensure further training to reduce the risk of this type of incident recurring is provided to the employee if appropriate. Training could include preventative measures and strategies.

APPENDIX F: REPORTING



Note

All Safeguarding incident reports and attached documents/records must be stored under lock and key. Where possible electronic versions should be encrypted