

OUR POLICY ON SAFEGUARDING

What's this policy about?

We're committed to protecting all children and vulnerable adults (**vulnerable groups**) against all forms of abuse. This policy explains how we'll do that. In particular we explain how we'll:

- recruit for job roles that involve regulated activity and working with vulnerable groups, and
- manage situations where we believe vulnerable groups could be or have been placed at risk.

We expect all our staff to share this safeguarding commitment. This policy also explains your responsibilities for safeguarding vulnerable groups and how you can report any safeguarding concerns or alleged or suspected abuse.

Is this policy part of my contract of employment?

No, and we can change this policy at any time, but if any changes are made, we'll always make you aware of them. We may also vary things like time limits in this policy, if we feel we need to.

Who's covered by this policy?

This policy applies to all employees, directors and other officers, workers, agency workers and volunteers. We also require in any contracts with self-employed consultants or contractors that they comply with this policy, and we'll make sure they're given access to a copy. All these people are referred to as '**staff**' in this policy.

Who's responsible for this policy?

While we ask all managers to take responsibility for making sure this policy is complied with, its successful operation also depends on you. All staff are responsible for reporting any alleged or suspected abuse that they become aware of, to their manager or a Director straightaway.

Please take the time to read and understand it, and to go back to your manager with any questions you may have. References to Directors in this policy mean the most senior people within our organisation.

Some Definitions

We've set out here the various legal definitions that apply in this policy.

- **Child:** anyone under 18 years' old.

- **Vulnerable adult:** anyone over 18 years' old who's defined as anyone over the age of 18 who may be unable to protect themselves from abuse, harm or exploitation, which may be by reason of illness, age, mental illness, disability or other types of physical or mental impairment.
- **Vulnerable groups:** children and vulnerable adults.
- **Regulated activity:** any of the activities defined as regulated activity in the Safeguarding Vulnerable Groups Act 2006.
- **Abuse:** as defined in the section below - What is abuse of vulnerable groups?

How we'll recruit for roles involving regulated activity

We'll review every job role to decide whether it involves regulated activity. If it does, we'll make that clear when we advertise the role.

We'll make any offer of employment in a job role involving regulated activity conditional upon receiving a satisfactory Enhanced Disclosure certificate with barred list check from the Disclosure and Barring Service (DBS) prior to starting in the role.

We use DBS checks to help us make sure that you're a suitable person to do the work involved in the job role and are not barred in any way from doing so. This will help prevent anyone unsuitable from working with our vulnerable groups.

Obtaining an Enhanced Disclosure certificate

An Enhanced Disclosure and barred list check from the DBS will look at whether you have any criminal record or have been added to any relevant barred list.

All Enhanced Disclosure certificates are issued directly to the person being checked by the DBS, so you'll need to forward the original certificate to your manager or a Director as soon as you have it.

We'll make sure the correct level of Enhanced Disclosure check is sought for the particular regulated activity we want you to do.

What happens if my role changes to involve regulated activity?

If you're asked to perform a regulated activity as part of your job role, and this is either:

- existing work that you already do, but it becomes a regulated activity, or
- different work that we ask you to do, which is a regulated activity,

you'll have to provide a satisfactory Enhanced Disclosure certificate before you can do this work for us, as set out above.

If you refuse to do the DBS check or if the Enhanced Disclosure certificate reveals that you have a relevant criminal conviction or that you've been placed on a relevant barred list, we'll then have to investigate this fully and assess the effect on your continued employment with us.

If you're not allowed legally to perform the regulated activity, or if we have reason to believe that it would otherwise be inappropriate, we may consider whether there are any other non-regulated activities that you could do for us. However, we

reserve the right to dismiss you in this situation, if we can't support your continued employment.

What if my DBS status changes?

You must tell us straightaway if, while you're working with us:

- there's any change to your DBS Enhanced Disclosure status, or
- you're investigated, cautioned or convicted of a criminal offence.

If the change is that you're added to a barred list, we can't legally allow you to continue to work in a regulated activity.

If the change in your DBA status means that you can't work in a regulated activity, we may consider whether there are any other non-regulated activities that you could do.

However, we reserve the right to dismiss you if, as a result of the changes, we can't support your continued employment.

What is abuse of vulnerable groups?

It's important to understand what we mean by abuse. It can take many forms and here are some examples:

- financial or material abuse,
- physical abuse,
- mental abuse,
- sexual abuse,
- domestic abuse,
- threats of abuse or harm,
- controlling or intimidating conduct,
- neglect and failures to act,
- self-neglect,
- poor practices within an organisation providing care,
- modern slavery.

This list is intended to help you understand the sort of abuse to look out for, but it isn't intended to be a complete list.

Abuse may happen as a one-off, or be something that carries on over a long period of time.

Please also be aware that abuse may come from anyone coming into contact with a child or vulnerable adult. So, this might include any of our staff, or any personal assistants, other service users, relatives, neighbours, social workers or providers of other support services – again this isn't intended to be a complete list.

Reporting alleged or suspected abuse

As part of your safeguarding responsibilities, we expect all staff to remain always on alert to the risks of abuse towards vulnerable groups.

If you believe or suspect that abuse is happening, you must tell your manager or a Director straightaway. We will take any complaints, allegations or suspicions of abuse extremely seriously.

When telling us about alleged or suspected abuse, please provide as much detail as possible, including:

- the names of the people involved,
- the nature of the abuse,
- the dates and times of any specific incidents (if known), and
- any evidence or other witnesses that may be available.

As part of our response, we may ask you not to discuss any allegations with other colleagues, other than anyone your manager specifies. This would be to avoid any spread of potentially harmful misinformation, and to protect our investigation.

How we'll investigate

You can be confident that we'll:

- investigate all reports of alleged or suspected abuse fully,
- investigate as quickly and as discreetly as we reasonably can, and
- gather the necessary evidence, usually using witness statements and any surveillance footage available.

As part of our safeguarding obligations, we may need to refer information about our investigation to the DBS and the police.

Suspending employees

If you're an employee suspected of abuse, we may suspend you on full pay while we investigate the allegations fully.

Suspension is not an indication of guilt, but we may believe it's necessary in the circumstances.

We don't take any decision to suspend an employee lightly, and are aware of the impact that lengthy suspension can have on someone's reputation, even when the allegations turn out to be incorrect.

Disciplinary action

If we have reason to believe that an allegation of abuse against an employee has foundation, we'll arrange a disciplinary meeting with them.

Abuse is regarded as an act of gross misconduct and therefore this may lead to summary dismissal under our Disciplinary Procedure.

Duties to refer information about alleged or suspected abuse

We both have obligations to report concerns to relevant professional bodies.

Our obligations

We'll always discuss any safeguarding concerns we have with the local safeguarding team and any other relevant professional body.

We're also required by law to refer some information about an individual to the DBS in the following situations:

- if you're dismissed or removed from working in a regulated activity because you have harmed or may harm a child or vulnerable adult,
- if we've suspended you and have reason to believe that you've
 - engaged in relevant conduct, or
 - harmed or may harm a child or vulnerable adult, or
 - received a caution or a conviction for a relevant criminal offence, or
- if you resign in circumstances where we suspect that you've harmed or may harm a child or vulnerable adult. (This could be, for example, where an employee resigns before we take disciplinary action.)

Your obligations

If you have any safeguarding concerns, we encourage you to discuss those concerns with the local safeguarding team, in addition to any discussions we may have with them.

Please remember that your obligation is to refer information to professional bodies about any child or vulnerable adult you suspect may be at risk of harm or abuse. It is not for you to make any decisions about that risk. Rather the professional bodies are the ones to assess the risk and act as required.

The relevant professional bodies to refer information to are:

- the NSPCC
- the Care Quality Commission.

Recordkeeping and storage

We'll always keep and store all safeguarding records in accordance with data protection rules, any statutory requirements and any relevant guidance of our relevant professional body and/or local safeguarding team.

And that's it... for now

We understand that things change, so we'll continue to review the effectiveness of this policy and make sure it's achieving its objectives.