

## SAFEGUARDING POLICY

### 1 Introduction

Eastwood Park Ltd are committed to safeguarding and promoting the welfare of all staff (to include employees, casual workers, consultants and freelancers) and learners including young people and adults at risk (previously vulnerable adults). Eastwood Park Ltd are committed to providing a caring, friendly and safe environment for all our learners so that they can learn in a relaxed and secure atmosphere. Eastwood Park Ltd recognises its duty to ensure that appropriate action is taken where a young person or adult at risk is experiencing harm or is at risk of harm.

The primary purpose of this policy is to:

- safeguard and promote the wellbeing of the young person or adult at risk with whom Eastwood Park Ltd work with
- ensure that all employees, sub-contracted staff, agency staff and any other staff working on behalf of Eastwood Park Ltd understand the context of this policy within which checking with the Disclosure and Barring Service takes place.
- provide all employees with guidance on how they should behave if they suspect that a young person or adult at risk may be experiencing, or be at risk from abuse or harm
- guide employees on how to respond to – and report – concerns
- ensure compatibility with other Eastwood Park Ltd policies

This policy applies to all employees of Eastwood Park Ltd; it is not part of your terms and conditions of employment and can be varied at any time. It also applies to all casual workers, consultants, freelancers and learners.

### 2 Definitions

**Safeguarding** denotes measures to protect the health, wellbeing and human rights of individuals, which allow people – especially young people and adults at risk – to live free from abuse, harm and neglect

**Child (young person)** anyone who has not yet reached their 18<sup>th</sup> birthday.

**Adult at risk** anyone aged 18 and over may be considered at risk if they, for example:

- Have a learning or physical difficulty
- Have a physical or mental illness
- Have a reduction in physical or mental capacity
- Are in receipt of any form of healthcare

### 3 Policy

All staff should have a basic awareness of safeguarding issues. This includes:

- Being alert to the possibility of abuse and neglect
- Having enough knowledge to recognise an abusive or potentially abusive event or set of circumstances
- Knowing who in the organisation to raise concerns with
- Being competent to take the appropriate immediate or emergency action

### **3.1 Duties and Responsibilities**

We have a responsibility to:

- Raise awareness of the need to protect young people and adults at risk
- Ensure that all staff in contact with young people and adults at risk have the knowledge and skill to carry out their roles safely and effectively
- Ensure safe practice when working with other organisations, that they have in place adequate safeguarding arrangements
- Maintain an organisation that is safe for all staff, young people and adults at risk
- Ensure that where required, staff consent to vetting through the Disclosure and Barring Scheme
- Ensure that all staff receive copies of safeguarding policies, understand their meaning, application and their responsibilities
- Ensure that all learners, including young people and adults at risk, are informed at induction who they should contact if there is an incident
- Ensure that the CEO, members of SMT and the Designated Safeguarding Officer (DSO) are accountable for the effective implementation of this policy

The DSO is responsible for ensuring that safeguarding is given a high priority within Eastwood Park Ltd. Specific responsibilities include:

- Providing support and advice to all staff on safeguarding matters related to a young person or adult at risk
- Ensure that all staff are made aware of our Safeguarding policy as part of their induction, and ongoing where required
- Manage all referrals and work with SMT to ensure resolutions
- Decide the appropriate course of action and if a referral outside the organisation is appropriate

Individual line managers are responsible for ensuring staff comply with the expectations set out in this policy. Specific responsibilities include:

- Being the first point of contact for reports of any concern
- Reporting all concerns to the DSO and working with them to resolve issues
- Providing advice and support to employees reporting disclosures or concerns

It is not the responsibility of Eastwood Park Ltd to decide whether or not abuse has taken place.

It is the responsibility of our staff to act if there is cause for concern.

### **3.2 Reporting a concern**

If you have a concern, or know of any abuse of any young person or adult at risk, you should treat it as a matter of urgency and immediately inform your line manager or if unavailable the DSO (if the DSO is also unavailable a member of SMT). You must not try to investigate on your own as you are not equipped or qualified to do so.

If a young person or adult at risk makes a disclosure to you, you should:

- Reassure the young person or adult at risk they have done the right thing
- Record what they say, sign and date the record
- Inform your line manager or the DSO as soon as possible and pass on the written record
- Maintain confidentiality and do not discuss with others
- Stay calm
- Try not to ask questions, but if required, ensure questions are open-ended questions to clarify understanding and not to promote or investigate
- Not give an opinion or offer advice
- Not promise confidentiality – explain you will need to speak to your line manager and/or DSO

Any concern must be documented and emailed to the DSO within 2 hours of a disclosure. Unless the young person or adult-at-risk is in immediate harm, where the relevant authorities will be contacted immediately. In this situation the young person or adult at risk must be accompanied until the relevant authorities arrive.

### **3.3 Allegations against staff**

Any suspicion, allegation or actual abuse of a young person or adult at risk by a member of Eastwood Park Ltd staff must be reported to the DSO immediately. Concerns about staff must be treated with the same rigour as other concerns. If there are concerns that abuse has taken place the DSO will pass this information to the Local Authority Designated Officer for investigation. The DSO will work with the member of staff's line manager and, along with SMT will also need to refer to the Disciplinary Policy and Procedure and decide whether the member of staff should be suspended pending a full investigation.

There may be instances when a staff member's performance or conduct when working with young people and/or adults at risk will lead to Eastwood Park Ltd's Disciplinary procedures being invoked.

### **3.4 Allegations against another young person or adult at risk**

On occasion, a young person or adult at risk may abuse another young person or adult at risk. Safeguarding procedures should be followed in respect of all parties in those situations.

### **3.5 Safer recruitment**

Eastwood Park Ltd carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with young people or adults at risk in line with the Disclosure and Barring Service requirements.

- **Basic check** – can be used for any position or purpose. A basic certificate will contain details of convictions and cautions from the Police National Computer (PNC) that are considered to be unspent under the terms of the Rehabilitation of Offenders Act (ROA) 1974.
- **Standard check** – is available for duties, positions and licences including the ROA 1974 (Exceptions) Order 1975, for example, court officers, employment within a prison and Security Industry Authority (SIA) licences. A standard level certificate contains details

of all spent and unspent convictions, cautions, reprimands and final warnings from the PNC.

- **Enhanced check** – available for specific duties, positions and licences, for example, regularly caring for, training, supervising or being solely in charge of children, specified activities with adults in receipt of health care or social care services. Enhanced certificate contains the same information at the standard level but also includes a check of information held by police forces.
- **Enhanced with a barred list check** – only available for those individuals who are carrying out regulated activity and a small number of positions listed in Police Act 1997 (Criminal Records) regulations, for example prospective adoptive parents, taxi and private hire vehicle licences. This certificate contains the same PNC information as an enhanced level check but in addition will check against the children's and/or adult's barred lists.

Where a criminal conviction is disclosed by an applicant or through a DBS check, the member of staff's line manager and the DSO will consider the assessment objectively. Where the assessment indicates that the level of risk is too high to allow them to start/continue working in a particular role/activity possible outcomes may include amended duties, redeployment, withdrawal of an offer of employment or, where they started work before the relevant screening check was completed, dismissal.

### 3.6 What is abuse?

Young people and adults at risk can potentially be abused within the family, community, staff in organisations (including those employed to promote their welfare and protect them from abuse), volunteers, visitors and fellow learners. Abuse is a misuse of power and control that one person has over another and can fall into the following categories:

- **Physical** - this includes assault, hitting, slapping, pushing, restraining someone or only letting them do certain things at certain times.
- **Domestic** - this includes psychological, physical, sexual, financial or emotional abuse. It also covers so-called 'honour' based violence.
- **Sexual** - this includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, taking sexual photographs, making someone look at pornography or watch sexual acts, sexual assault or sexual acts the person was pressured into consenting to carry out.
- **Psychological** - this includes emotional abuse, threats of harm or abandonment, depriving someone of contact with someone else, humiliation, blaming, controlling, intimidation, putting pressure on someone to do something, harassment, verbal abuse, cyber bullying, isolation or unreasonable or unjustified withdrawal of services or support networks.
- **Financial or material** - this includes theft, fraud, internet scamming, putting pressure on someone about their financial arrangements (including wills, property, inheritance or financial transactions) or the misuse or stealing of property, possessions or benefits.
- **Modern slavery** - this covers slavery (including domestic slavery), human trafficking and forced labour. Traffickers and slave masters use whatever they can to pressurise, deceive and force individuals into a life of abuse and inhumane treatment.
- **Discriminatory** - this includes types of harassment or insults because of someone's race, gender or gender identity, age, disability, sexual orientation or religion.
- **Organisational** - this includes neglect and poor care in an institution or care setting such as a hospital or care home, or if an organisation provides care in someone's home.

The abuse can be a one-off incident or repeated, on-going ill treatment. The abuse can be through neglect or poor professional practice, which might be because of structure, policies, processes and practices within an organisation.

- **Neglect and acts of omission** - this includes ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, or not giving someone what they need to help them live, such as medication, enough nutrition and heating.
- **Grooming** - is a word to describe people befriending young people and adults at risk to take advantage of them for sexual preferences. Grooming is usually associated with young people but it does also effect adults at risk. Sexual online grooming is when people form relationships with young people, using social media platforms to do so. They will tend to use chatrooms, pretend to be a young person themselves and even change their gender. Grooming online is anonymous and young people find it easier to trust an online 'friend' than someone they have met 'face to face'.
- **Self-neglect** - this covers a wide range of behaviour which shows that someone is not caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding.
- **Female genital mutilation (FGM)** - FGM is illegal in England and Wales, it is a form of child abuse and violence towards women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. The FGM mandatory reporting duty is a legal duty provided in the FGM Act 2003 (amended by the Serious Crime Act 2015) for people working in a regulated profession in England and Wales, ('registered' in relation to a regulatory body, means registered in a register that the body maintains by virtue of any enactment).

### 3.7 Supporting staff

It is the responsibility of line managers to ensure that the staff they line manage are aware of and understand the procedures and have levels of knowledge and skills commensurate to the level and nature of their direct involvement with young people and adults at risk.

All staff should:

- Work to Eastwood Park Ltd's Safeguarding policy and procedures which are reviewed and updated as necessary
- Be able to raise concerns about poor and dangerous practice
- Have support as required to effectively discharge their responsibilities

To maintain their safety, and the safety of the young person or adult at risk, staff should not:

- Befriend young people or adults at risk on personal social media
- Distribute personal telephone numbers to young people or adults at risk
- Use sarcasm, insults or belittling comments towards young people or adults at risk
- Visit young people or adults at risk at home or transport them to and from locations
- Develop personal relationships with young people or adults at risk

### 3.8 Further information

Should anyone wish to find out more about safeguarding, they should contact the DSO.

## 4 Document management

### 4.1 Version control

<b>Version:</b>	3.1
<b>Date of version:</b>	17/01/2022
<b>Approved by:</b>	Strategic Management Team
<b>Confidentiality level:</b>	Public

### 4.2 History

<b>Date</b>	<b>Version</b>	<b>Author</b>	<b>Comment/change/approval</b>
05/03/2019	1.0	Lisa Slevin	Initial draft
12/06/2019	2.0	Carly Jones	HR review
27/06/2019	2.0	Carly Jones	Senior Management Team approval
05/01/2022	3.0	Carly Bennett	Policy review, removal of implementation plan and Strategic Management Team approval
17/01/2022	3.1	Carly Bennett	Change of renewal period from two years to one year

### 4.3 Review

This policy will be reviewed every year by the Head of HR.

Date set for review: January 2023