

Safeguarding and Protection from Abuse Policy

Reviewed by:
Dom Williams, Safeguarding Lead
December 2022

Policy Objectives:

The objective of this policy is to:

- Ensure safeguards are in place to protect the children, young people, adults and those in direct contact with service users at risk with whom Circles South East works.
- For the purposes of this policy, Core Members are regarded as potentially adults at risk.
- To promote the welfare of children, young people and adults, taking reasonable measures to minimise risk to themselves and/or others.
- To be read in Conjunction with Safeguarding and Whistleblowing policies and procedures, together with the relevant flowcharts

Policy Scope:

Safeguarding is a term which is broader than ‘protection’ and relates to the action the organisation takes to promote the welfare of children, young people and adults at risk and protect them from harm.

This policy applies to anyone working on behalf of Circles South East including senior managers and the board of trustees, paid staff, volunteers, sessional workers, researchers and student placements.

Safeguarding Children and Young People

Safeguarding is defined in Working Together to Safeguard Children 2018 Guidance as:

- Protecting children and young people from maltreatment
- Preventing impairment of children and young people’s health and development
- Ensuring children and young people grow up in circumstances consistent with the provision of safe and effective care, this includes a non-exhaustive list of basic care i.e. emotional stimulating, emotional warmth, clear boundaries, provision of basic food and shelter and good enough housing environments.
- Taking action in the event of a child or young person’s health or developmental needs not being met.

Safeguarding Adults at Risk

Safeguarding is defined by the Care Act Statutory Guidance 2018 as protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

It applies when an adult:

- Has needs for care and support
- Is experiencing or is 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, neglect or harm.

Policy Aims:

1. Circles SE aims to safeguard children, young people and adults at risk of harm.
2. Circles SE will aim to ensure that:
 - all Circles SE employees and volunteers involved in working with children, young people and adults at risk abide by the Code of Conduct to ensure a safe and healthy environment;
 - all Circles SE employees and volunteers are aware of safeguarding issues both in the context of organised activities and within the home and community;
 - standard procedures are in place to protect the children, young people and adults at risk, first and foremost when suspected abuse or actual abuse is reported and that all Circles SE employees and volunteers providing services for children, young people and adults at risk understand these procedures and sign a policy declaration form;
 - there is an ethos of mutual support amongst staff and volunteers so any questions and concerns may be challenged and shared;
 - when abuse is reported it is recognised that the child, young person or adult at risk is potentially at risk and safety is paramount. Circles SE will respond to any reported safeguarding concerns immediately and will ensure safety is evidenced, any concerns will be treated with the assumption that the person(s) is/are at risk.
3. Circles SE recognises that in providing services there is a need to provide and maintain a high degree of physical and emotional wellbeing for children, young people and adults at risk. Therefore the following procedures will be implemented:
 - make sure staff and volunteers are aware of the Safeguarding and Protection from Abuse Policy;
 - make sure that staff, volunteers, partner agencies and the public can effectively report concerns about children, young people or adults at risk.

- operate sound recruitment and selection procedures for Circles SE employees and volunteers to ensure suitability for working with children, young people and adults at risk (on page 5 of this document)
 - identify within staff/volunteer supervision any training needs related to safeguarding and enable appropriate training to take place for employees and volunteers who work with children, young people and adults;
 - demonstrate best practice as within the Code of Conduct to ensure the safety of children, young people and adults at risk.
4. A glossary of the terms used is available in Appendix 1.
 5. A Safeguarding incident reporting/actions flowchart is provided in Appendix 5

Relevant Legislation

The following legislation and guidance have been taken into account in the development of this policy:

- The Rehabilitation of Offenders Act (1974)
- The Children Act (1989)
- The Police Act (1997)
- Public Interest Disclosure Act (1998)
- The Protection of Children Act (1999)
- Criminal Justice and Court Services Act (2000)
- Care Standards Act (2000)
- The POVA or Protection of Vulnerable Adults scheme launched 2004
- Every Child Matters and the Children Act (2004)
- Safeguarding Vulnerable Groups Act (2006)
- Equality Act (2010)
- Working Together to Safeguard Children (2015)
- The Care Act 2014
- All local threshold of needs – South East region
- Sexual offences Act 2003

Roles and Responsibilities:

1. **Trustee Safeguarding Lead** has overall responsibility for safeguarding.
 - They will receive and disseminate quarterly safeguarding reports to the Board. The report is to contain a resume of all safeguarding activity for each quarter, concerns, referrals, policy updates and training. All actions and outcomes are to be included in relation to each concern.
 - They will ensure that any concerns are cross-referenced with the risk register and will review any actions taken.

- They will be notified immediately when safeguarding issues arise.
2. **Safeguarding Lead** is responsible for overall safeguarding oversight.
- This includes GDPR compliance, oversight of all safeguarding and risk escalation processes, referrals, ensuring all policies, procedures and practice guidance are adhered to. Reviews of these will take place annually.
 - They will report at least quarterly to the CEO and Trustee Safeguarding Lead or in the event of a child protection referral or a criminal investigation.
 - They are the individual management review author for cases of domestic homicide and/or mental health reviews.
 - They will monitor and review staff and volunteer training and induction.
3. **Children and Vulnerable Adults Designated Officers** have responsibility for:
- Ensuring Circles SE operates procedures for dealing with allegations in accordance with local Safeguarding Boards;
 - Referring concerns and liaising with local Children's Social Services, Adult Social Services and police;
 - Maintaining detailed and accurate written records of safeguarding and protection concerns;
 - Ensuring staff and volunteers have access to and understand the Safeguarding and Protection from Abuse Policy, and is responsible for this document and its compliance;
 - Ensuring all staff and volunteers receive safeguarding induction training which includes sharing the Safeguarding and Protection from Abuse Policy, staff Code of Conduct and identity of designated officers;
 - Ensuring safeguarding skills and competencies are refreshed every year for all staff and volunteers, appropriate for their role;
 - Ensuring the organisation is suitably represented at any multi-agency meetings, case conferences and Multi Agency Public Protection Arrangement (MAPPA) meetings where appropriate.

The list of Circles SE Designated Officers can be found in Appendix 4.

4. **Whistleblowing Officer** oversees any whistleblowing concerns raised and are responsible for:
- Ensuring investigations take place and respond to concerns raised
 - Escalating concerns in conjunction with the Safeguarding Lead and Trustee Safeguarding Lead with the knowledge of the CEO
 - Ensuring an appropriate support network is in place for any whistleblowing witness.
 - Ensuring that the policy is acted on appropriately.

- Ensuring that appropriate independent advice and support are in place and that these are advertised, signposted and available to all service users, staff and volunteers.
- Contacting relevant authorities (eg Police) where necessary.
- Where a whistleblower elects to engage with an independent organisation (ie The Charity Commission), the Whistleblowing Officer will endorse this and ensure Circles SE engagement with any processes (eg. mediation/disciplinary procedures) recommended by that organisation.

Recruitment and Disclosure and Barring:

Safer Recruitment for Staff and Volunteers

Information provided by applicants and referees will be scrutinised where applicable by:

- Taking up and satisfactorily resolving any discrepancies or anomalies
- Verifying identity and any essential academic or vocational qualifications
- At least two references being taken for successful candidates; references are followed up and verified.
- All interview panels containing a member of staff with up to date safer recruitment training
- Making an application for a Disclosure and Barring Service, with or without barring list check (where required)
- Conducting an overseas criminal record check (where appropriate)
- Conducting a prohibition order check (where appropriate).

Training and supervision

1. Designated safeguarding leads are responsible for ensuring members of staff and volunteers have the appropriate level of training for their role
2. The type of training should reflect the job role and responsibilities given to the member of staff and volunteer.
3. All Youth volunteers are required to engage in either group or individual supervision with the Youth and Family Service Lead every four weeks.
4. All members of staff and volunteers who are:
 - In contact with children, young people or adults at risk during the normal course of their role, or working directly with children or young people will be required to complete local Children's Safeguarding Board General or Specialist Training or equivalent, appropriate to their role.
 - Working directly with adults at risk will be required to complete in-house training or training through local Adult Safeguarding Boards or equivalent, appropriate to their role.

- Working directly with children, young people and adults at risk will refresh their training every two years.
 - Responsible for children, young people and adults at risk will refresh their training every year.
5. The Designated Officers will be required to attend Specialist Safeguarding Children training and/or Safeguarding Adults training, appropriate to their role. The training will be refreshed every two years.
 6. The Trustee Safeguarding Lead will be required to attend Designated Lead Safeguarding Children training and Safeguarding Adults training. The training will be refreshed every two years.

Raising Concerns about Children, Young People or Adults at Risk:

You may become concerned about the safety or welfare of a child, young person or adult at risk in a number of ways:

- The person may tell you
- The person may say something that worries you
- A third party may voice concerns
- You may see something – an incident or an injury or other sign.

(Appendix 2 provides a list of definitions of abuse of children and young people. Appendix 3 provides a list of definitions of abuse of adults at risk).

Procedure for dealing with concerns

Safeguarding

1. All concerns that a child, young person or adult at risk has been harmed or is at risk must be reported to your Coordinator or a Designated Officer/Safeguarding Lead at the earliest opportunity.

The Safeguarding Lead is responsible for:

- a. Reporting any concerns relating to children and young people to the Local Authority Designated Officer (LADO) if abuse is identified or suspected.
- b. Ensuring all professionals, parents/guardians involved with a child or young person are informed of any safeguarding concerns, in compliance with GDPR.
- c. Reporting concerns relating to adults at risk to local Adult Social Care Team.
- d. Completing the Circles SE incident reporting form, which should:
 - Be detailed with concerns and nature of risk
 - Be factual (who, what, where, when, how)

- Be supported by available evidence e.g. a summary of what has been disclosed
 - Provide details of all actions taken
 - Include a detailed outline of outcomes and follow up actions required
 - Be copied to the senior safeguarding team
 - Should include comment and/or conclusion by Safeguarding Lead Officer
2. If you are not sure as to whether an external referral is required you can contact Children’s Social Care or Adult Social Care and ask for a ‘No Name’ consultation. This is where you discuss the situation without mentioning names or details of the persons involved. You will then be advised as to whether a Referral is required or of other steps that you should take.
 3. Where there is disagreement about response thresholds not being reached, triggering the Circles SE risk escalation procedure (in conjunction with the CEO and Safeguarding Lead), it may be necessary to escalate concerns in writing, informing the relevant authority’s senior management team.
 4. Circles SE Senior management team in conjunction with the Safeguarding Lead will ensure there is a robust contextualising safeguarding process of concerns planned and reviewed, in order to support all parties involved.

Emergencies

1. Where an immediate police or medical response is required e.g. if the child, young person or adult at risk is in immediate danger of harm/injury you should contact the emergency services and inform your Coordinator or Line Manager or a Designated Lead at the earliest opportunity once it is safe to do so.

Responding to Verbal Allegations of Abuse

1. The person who receives the information concerning the actual/suspected case of abuse should:
 - React calmly and quietly
 - Take the allegations seriously
 - Say little and give time for the other person to talk
 - Keep questions to an absolute minimum, not probe or lead i.e. “tell me... explain to me... describe to me...” or “who”, “what”, “when” etc.
 - Explain confidentiality and that information will be shared and why it must be shared – namely to keep the person safe as well as others who may be at risk of harm
 - Explain what will happen after disclosure
 - Make a full record of what has been said within 24 hours
 - Pass the information onto your Coordinator or Designated Lead

2. Always:
 - Listen with a non-judgemental attitude
 - Ensure all communication is characterised by openness, honesty, reliability, trustworthiness and rigorously applied boundaries

Procedure for Allegations of Abuse Involving Circles SE Staff or Volunteers

1. If an allegation of abuse is made against a member of staff it should immediately be brought to the attention of the CEO of Circles SE
2. If an allegation of abuse is made against a volunteer it should immediately be brought to the attention of the Safeguarding Lead
3. In either case all allegations of abuse against a member of staff or volunteer will be reported to the Local Authority Designated Lead and the initial consultation will be guidance on the next steps directed by the LADO and followed by Circles SE.

Acceptable and Unacceptable Behaviour

Circles SE is committed to ensuring staff and volunteers behave appropriately when working with children, young people and adults at risk.

Please also refer to the Circles SE Code of Conduct.

Appendix 1 – A glossary of terms used

Members of Staff

1. All members of staff employed by Circles SE, permanently or temporary and contract staff

Volunteers

2. All persons who volunteer for Circles SE whether permanently or on an ad hoc basis

A Child

3. Is defined as a person who is of compulsory school age (a child is of a compulsory school age until the last Friday in June in the school year which they reach 16).

A Young Person

4. Is defined as a person under the age of 18

An Adult at Risk

5. Is defined as a person aged 18 years or over:
 - Who is or may be in need of care or support. Who is experiencing, or is at risk of, abuse or neglect, and
 - As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it
 - This could include:
 - People with dementia
 - People with learning difficulties
 - People with mental health problems
 - People with drug and alcohol problems
 - People with sight and hearing or physical disabilities
 - People who through age or illness are dependent upon other people to help them
 - People who care for others
 - For the purposes of this policy Core Members are classed as adults at risk

Core Member

6. A person who has a sexual offence conviction or who is displaying sexually harmful behaviours and is supported by Circles SE.

Local Safeguarding Children's Board

7. The Children's Act 2004 requires each local authority to establish a Local Safeguarding Children's Board (LSCB). The LSCB is the key statutory mechanism for agreeing how all relevant organisations in the local area will cooperate to safeguard and promote the welfare of children, young people, and for ensuring the effectiveness of their arrangements for safeguarding.

Local Safeguarding Adults Board

8. The Care Act 2014 requires each local authority to establish a Safeguarding Adults Board (SAB) for its area. The SAB is the key statutory mechanism for agreeing how all relevant organisations in the local area will cooperate to safeguard and promote the welfare of adults at risk, and for ensuring the effectiveness of their arrangements for safeguarding.

Disclosure and Barring Service

9. The DBS combines the functions of the ISA and the CRB into one organisation. It operates the vetting and barring scheme which aims to prevent unsuitable people from working with children, young people or adults at risk and conducts criminal record checks to enable an assessment to be made on the suitability of a person to care or work with children, young people or adults at risk.

Trustee Safeguarding Lead

10. A member of the Circles SE Board who has responsibility for ensuring the charity discharges its duty to safeguard and protect children, young people and adults at risk.

Designated Officer

11. Is a term used throughout this policy to describe the Circles SE employees who have responsibility for handling all cases of abuse / suspected abuse within Circles SE.

Appendix 2 – Definitions of abuse used against children and young people

****This list is by no means exhaustive****

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. This includes child on child harmful sexual behaviour

The activities may involve physical contact, including penetrative (i.e. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless, unloved or inadequate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development capability, over-protection and limitation of exploring and learning, or preventing the child from participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children to feel frightened or in danger or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of children.

Neglect

Neglect is the persistent failure to meet the child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health and development. Neglect may occur during pregnancy as a result of maternal substance misuse.

Child Sexual Exploitation

Sexual exploitation is where a young person under 18 receives 'something' (e.g. food, accommodation, drugs, gifts, money) as a result of performing, and/or others performing on them, sexual activities.

Child sexual exploitation can occur through use of technology, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain.

In all cases the person exploiting the young person has power over them by virtue of age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common. The involvement in exploitative relationships is characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is defined by the World Health Organisation as:

“all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons”.

FGM is sometimes referred to as Female Circumcision or Female Genital Cutting however this does not depict the nature or impact of the practice.

FGM is based in ancient beliefs surrounding the need to control women's fertility and sexuality. It is a cultural practice based on custom and tradition. It is also based on the incorrect belief that it protects a girl's virginity, protects family honour, is more hygienic, desirable, and attractive and increases sexual pleasure for men. It is practiced to enhance a girl's prospects of marriage. It is carried out in the name of culture and religion. FGM is not a requirement of any religion. It is practiced by Christians, Muslims, Jews and non-believers in a wide range of communities and cultures. FGM is most frequently carried out on young girls between infancy and the age of 15.

Female Genital Mutilation has a devastating impact on the health and wellbeing of women and young girls, for some it may be fatal. Short term problems caused by FGM include severe pain and emotional shock.

Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Children and young people can be radicalised in different ways:

- They can be groomed either online or in person by people seeking to draw them into extremist activity. Older children or young people might be radicalised over the internet or through the influence of their peer network – in this instance their parents might not know about this or feel powerless to stop their child's radicalisation;
- They can be groomed by family members who hold harmful, extreme beliefs, including parents/carers and siblings who live with the child and/or person(s) who live outside the family home but have an influence over the child's life;
- They can be exposed to violent, anti-social, extremist imagery, rhetoric and writings which can lead to the development of a distorted world view in which extremist

ideology seems reasonable. In this way they are not being individually targeted but are the victims of propaganda which seeks to radicalise.

A common feature of radicalisation is that the child or young person does not recognise the exploitative nature of what is happening and does not see themselves as a victim of grooming or exploitation.

The harm children and young people can experience ranges from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to young children being taken to war zones and older children being groomed for involvement in violence.

Appendix 3 – Definitions of abuse against adults at risk

****This list is by no means exhaustive****

Physical Abuse

Being physically hurt or harmed, or put at risk of harm, either deliberately or through rough, careless or thoughtless behaviour.

Sexual Abuse

This includes all unwanted sexual acts or being made to do something that you don't want to, didn't or couldn't agree to. Sexual abuse does not have to be physical, for example it could include jokes or comments or being made to watch, look at or listen to something that makes you feel uncomfortable or embarrassed.

All adults have the right to express their sexuality. However, where there is any doubt as to a person's capacity to make informed decisions it is essential that the concern is reported and the necessary assessments are carried out in accordance with the Mental Capacity Act.

Emotional Abuse

Being humiliated or put down or made to feel anxious, frightened or intimidated. Some level of emotional abuse is involved in all forms of ill-treatment, though it may also be happening on its own. Emotional abuse is often the first sign of other forms of abuse happening.

Financial or Material Abuse

This includes theft, fraud, or exploitation and the misuse of position of power or authority for financial gain.

Neglect or acts of omission

- Ignoring a person's medical or physical care needs
- Withholding the necessities of life, such as medication, food/drink and heating
- Failure to provide access to appropriate health, social care or educational services.

Neglect may also occur where there is failure to take appropriate action to safeguard a person's welfare or to be negligent in the face of risk.

Concerns or allegations of physical or sexual abuse are often seen as more serious than neglect. But long standing physical neglect is often a major factor in deaths from abuse.

Institutional/Organisational abuse

This can sometimes happen in residential homes, nursing homes, group living environments, hospitals. It can also occur in organisations that don't offer residential services. The abuse is when people are mistreated because of poor or inadequate care, neglect or poor practice.

Modern Slavery

Modern slavery includes offences of slavery, servitude, sexual exploitation and forced or compulsory labour and human trafficking.

Exploitation

Exploitation is the deliberate maltreatment, manipulation or abuse of power and control over another person. It is taking advantage of another person or situation usually, but not always, for personal gain.

Domestic Abuse:

Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so-called 'honour' based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence.

Mate Crime

This occurs when someone befriends a vulnerable adult in order to exploit, hurt or harm them. This can include sexual abuse, forced prostitution, financial exploitation, physical abuse or other violence.

Appendix 4 – Circles SE Designated Safeguarding Officers

- Elizabeth Jones – **Circles South East Trustee Safeguarding Lead** - 01235 816050
- Dom Williams – **Circles South East Safeguarding Lead** – 01235 816050/07918 083903
- Lesley Martin – **Circles South East (Child and Adult Focused) Designated Safeguarding Officer** – 01235 816050/07393 233897
- Susie Hunt – **Circles South East (Adult Focused) Designated Safeguarding Officer** - 01235 816050/07776 959207
- Dan Leigh – **Circles South East (Child Focused) Designated Safeguarding Officer** - 01235 816050/07776960499
- Circles South East HQ – 01235 816050 (Normal office hours 9am – 5pm Monday to Friday)
Out of Hours No: 0300 303 0781 (5pm – 9pm Monday to Friday)
(Circles SE staff rota system applies, all concerns will then be reported to the Safeguarding Lead)

Appendix 5 – Circles South East safeguarding procedure flowchart

