



Active Communities Network Safeguarding Young People and Adults (at Risk)

Policy (NI)

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1. Purpose

Active Communities Network (A.C.N) wants to ensure that all participants experience an inclusive, enjoyable and safe environment, in which they feel respected and valued. We all share an objective to keep young people adults, adults at risk and adults in need of protection. The law clearly states that anyone employed to work with vulnerable groups is under a legal 'duty of care' and must play their part in working with other organisations to protect young people and adults from harm. A.C.N adapts a zero tolerance to abuse to young people and adults.

All Young People and adults with whom we work have a fundamental right to be safeguarded from harm.

- The purpose of this Policy and related procedures is to: promote the welfare of young people and adults, and protect them from harm
- prevent harm occurring through early identification of risk and appropriate timely intervention
- identify staff responsibilities in dealing with reports or suspicions of abuse
- provide clear and robust guidance on how to handle these concerns
- encourage good practice in all aspects of promotion and protection of young people and adults

2. Context

A.C.N will carry out its responsibilities under all relevant legislation, regulations and professional guidelines which include the following:

- Children Northern Ireland Order 1995
- Children's Services Co-operation Act (Northern Ireland) 2015
- Co-operating to Safeguard Children and Young people in Northern Ireland (HSSPS – March 2016)
- Human Rights Act 1998
- Safeguarding Vulnerable Groups (Northern Ireland) Order 2007 (as amended by the Protection of Freedoms Act 2012)
- United Nations Convention on the Rights of the Child
- Adult Safeguarding Board NI DHSSP

For further information on safeguarding legislation please visit

<http://www.legislation.gov.uk/>

Co-operating to Safeguard Children and Young People in Northern Ireland 2016

- Keeping Children Safe: Our Duty to Care. Standards and Guidance for Safeguarding Children and Young people, Volunteer Now
- Keeping Adults Safe: A Shared Responsibility. Standards and guidance for Adult Safeguarding, Volunteer Now

To access the above good practice guidelines please visit

www.volunteernow.co.uk

3. Scope

This Policy and related procedures deals with the safeguarding and protection of young people and adults from abuse, as defined below.

- **Child/Young Person - People**

For the purposes of this policy the following definitions have been used. The Safeguarding Vulnerable Groups (Northern Ireland) Order (SVGO) 2007 states that:-“‘child’ means a person who has not attained the age of 18;” (see article 2 of that Order). In this policy referred to as young people to reflect the cohort with whom we work.

- **Adult**

The Northern Ireland Safeguarding Partnership (Adult Safeguarding Prevention and Protection in Partnership policy document 2015) defines-:

“An ‘Adult at risk of harm’ is a person aged 18 or over, whose exposure to harm through abuse, exploitation or neglect may be increased by their: i) personal characteristics (may include, but are not limited to, age, disability, illness, physical or mental infirmity and impairment of, or disturbance in, the functioning of the mind or brain); and/or ii) life circumstances (may include, but are not limited to, isolation, socioeconomic factors and environmental living conditions);”

“An ‘Adult in need of protection’ is an adult at risk of harm (above) i) who is unable to protect their own well-being, property, assets, rights or other interests; and ii) where the action or inaction of another person or persons is causing, or is likely to cause, him/her to be harmed.”

Factors which can increase the vulnerability of children and adults include situations where there is:

- social/emotional isolation;
- a pattern of violence which exists or has existed in the past;
- drugs/alcohol use;
- stress on relationships;
- an illness that causes unpredictable behaviour;
- a person experiencing communication difficulties;
- an existence of persistent financial problems.

All staff have a responsibility to be aware of the above factors which may increase the vulnerability of young people and adults and to adhere to the guidance contained in this policy. The above list is not exhaustive.

Definitions, signs & indicators of abuse

- **Abuse** (see Appendix 1 for more detail)
- Neglect or acts of omission

- Physical abuse
- Sexual abuse
- Psychological/Emotional abuse
- Financial or material abuse (Exploitation)
- Discriminatory abuse
- Institutional abuse
- Child sexual exploitation

4. General Principles

This policy and related procedures are based on the following principles:

- A.C.N seeks to provide and promote a safe learning environment for all users.
- A.C.N recognises that anyone can be the subject of abuse and that all allegations of abuse will be taken seriously and treated in accordance with the organisations procedures.
- This Policy and related procedures will be reviewed annually to ensure they reflect current legislation and best practice.
- A.C.N will use best practice in its safe recruitment of staff by undertaking the appropriate checks, inc. Access NI, for those involved in any regulated activity with Children, Young People or Adults at Risk.
- AC.N. utilises employer references to highlight any previous concerns about new employees. These are reviewed by HR and filed away in staff folders, and stored for the duration of employment, plus 6 years.
- The organisation reserves the right to refuse to employ any person who has a conviction for the abuse of a child, young person or adult at risk of harm. All A.C.N staff will be subject to background checks.
- The organisation must follow criminal disclosure risk assessment procedures, before enrolling any person who has a conviction for the abuse of a child, young person or adult at risk of harm.
- The organisation will collaborate with regional policies and procedures in full partnership with other local agencies and the Health and Social Care Trust Gateway Team.
- Our staff will listen, record and report all concerns, disclosures and allegations of abuse in accordance with current procedures in an empathic, prompt and secure manner.
- A.C.N will NOT investigate instances of abuse as this is the role of other statutory agencies e.g. social services, PSNI.
- The organisation will inform all users, Children & Young people and those persons with parental responsibility about A.C.N's policy and procedures and that this may mean we refer cases to investigative agencies in the interest of the child, young person or adult at risk of harm. The reporting procedures are visible throughout our building, for all individuals to see. These highlight the concern and complaints policies and are talked through with groups, parents and individuals during induction.
- Parents are provided with information on our safeguarding policy. Parents are given with the Child Safeguarding Team details and Complaints process when their child registers with Active Communities Network, should they have any concerns and these

will be dealt with alongside HR and appropriate agencies to investigate concerns.

- A.C.N is committed to supporting, resourcing and training those who work with, or come in contact with children, young people and adults at risk of harm and to provide appropriate supervision.

The policy will be implemented in the following ways:

- All staff are required to follow the staff code of behaviour for Young Person and Adult Safeguarding
- All staff must refer all concerns, allegations or suspicions to a Designated Safeguarding Officer promptly using the appropriate recording methods
- All members of staff will report these concerns, allegations or suspicions to the Designated Safeguarding Officer
- The Designated Safeguarding Officer/Safeguarding Champion will undertake to contact external agencies when and where appropriate.
- Staff will make extra considerations for residentials and outings, in relation to risk assessments, staffing ratios and insurance.

5. Responsibilities

All staff

It is the responsibility of **ALL** staff working in A.C.N to record and report abuse and incidents of concern. This responsibility extends to all staff, not just those specifically working with children, young people and adults at risk of harm. Therefore it is the responsibility of all staff to:

- Anyone with an **immediate concern** about the safety or welfare of a child or young person should contact the police via a 999 call.
- Anyone with a concern about the safety or welfare of a child or young person in circumstances other than an emergency should fill in the safeguarding record form and forward it on immediately to their designated safeguarding officer.
- Adopt child protection and adult at risk of harm guidelines including the code of behaviour for staff.
- Act upon any concern, no matter how small or trivial it may seem, in accordance with A.C.N's procedures.
- Promote safe practice and challenge poor and unsafe behaviour.
- Ensure all health and safety procedures are adhered to.

Staff must adhere to the Staff Code of Behaviour Policy as per Appendix 2.

Staff must follow and ensure that they comply with all A.C.N Policies relating to Safeguarding including: Social Media, Lone Worker and Anti Bullying Policies – As detailed in Appendix 2.

Designated Safeguarding Champion (DSC)

The Designated Champion is responsible for liaising with the CEO and Designated Safeguarding Manager over these matters including:

- Ensuring that A.C.N has procedures and policies which are consistent with the requirements for safeguarding participants
- Ensuring that the Governing Board reviews this policy annually
- Ensuring that each year the Governing Board is informed, by way of a report, of how A.C.N and its staff have complied with the policy.

The Designated Champion is responsible for overseeing the liaison, on behalf of A.C.N, between Social Services and the PSNI in connection with any allegations against the CEO or the Designated Safeguarding Manager. This will not involve undertaking any form of investigation but will ensure good communication between the parties and provide information to assist enquiries.

A.C.N Belfast

The Designated Safeguarding Champion (for adults) is:

Rachelle Mc Curry

Email: Rachelle@activecommunities.org.uk

Tel: 07711557118

Designated Safeguarding Manager (DSM)

All A.C.N sites are required to have a designated member of staff, who is assigned to act upon child, young people and vulnerable protection concerns. As A.C.N is a large organisation we have a number of Designated Safeguarding Champions to oversee, and co-ordinate all strategic and operational organisation protection matters. To support this role, we also have a number of Designated Safeguarding Officers across A.C.N sites to deal with the day to day operations of child, young people and adult protection.

The Designated Safeguarding Manager is:

Oli Rahman

Email: Oliur@activecommunities.org.uk

Tel: 07791638653

The Designated Safeguarding Manager's role is to:

- Liaise with A.C.N management regarding safeguarding policy, procedures and any reported incidents of concern.
- Liaise with the local Gateway Team regarding safeguarding procedures and any reported incidents of concern.
- Liaise with and understand the roles and responsibilities of all the appropriate investigating agencies.
- Liaise with the Designated Safeguarding Champion on all protection matters relevant to A.C.N governance.
- Review this policy and related procedures annually.
- Oversee and monitor the security of record keeping.
- Develop and monitor a Safeguarding Action Plan.
- Ensure that safeguarding measures are implemented at all A.C.N events that may involve children, young people or adults at risk of harm.
- Manage and support all Designated Safeguarding Officers

Designated Safeguarding Officer (DSO): Rachelle Mc Curry

We have a number of Designated Safeguarding Officers with responsibilities for all A.C.N sites. They should be contacted for information, advice and reporting of concerns, disclosures or allegations of abuse.

The role of the Designated Safeguarding Officer is to:

- Receive information from any staff, volunteers, children, parents or carers who have safeguarding concerns and record it.
- Advise staff on protection policy, procedures and record keeping.
- Assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.

- Record statements and information relating to any safeguarding issues.
- Store all information and recording in a secure manner and in accordance with Data Protection Act 1998.
- Advise the Designated Safeguarding Manager of identified cases.
- To report concerns to PSNI/Social Services in the absence/unavailability of the DSM (or if the allegation is against the DSM) or in the instance of an immediate threat to a person(s) safety or welfare.

HUMAN RESOURCES

The role of the Human Resources Department is to:

- Ensure the safe recruitment and induction of all staff including all appropriate Access NI checks, in line with Safer Recruitment Policy Appendix 2
- Oversee staff disciplinary investigations if any concerns, disclosures or allegations of abuse by a staff member are made.
- Plan, deliver and monitor in partnership with other partners the appropriate level of training required by all staff.
- Annually review and update its own policies to reflect young people and adult protection needs.

SAFEGUARDING TRAINING

All staff and volunteers to complete safeguarding awareness during the induction period and also completed formal Safeguarding Training within 6 weeks of starting employment with A.C.N. Refresher training to be completed every and safeguarding policy reviewed every 3 years.

Designated Safeguarding Officers and Managers to complete formal Designated Safeguarding Training immediately once appointed if no other training SG Officer in post or within 3 months of being appointed and then 3 years thereafter for refresher training.

Designated Safeguarding Officer Training to be completed once appointed if no other SG Champion in place or within 3 months of appointment and then 2 years thereafter for refresher training.

6. Confidentiality

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety and welfare of the child/vulnerable adult is the overriding concern. The degree of confidentiality will be governed by the need to protect the individual and therefore complete confidentiality cannot be guaranteed. In general the following guidelines should be used:

- The individual should be informed at the earliest possible stage of the disclosure that the information may be passed on and where possible their permission to disclose sought.
- All conversation regarding a safeguarding concern should always be held in a person sensitive environment. Staff must not discuss the case with anyone other than those involved in the case.
- If staff have any concerns about the progress of the case or have any other concerns these must be discussed with the DSM or the DSO dealing with the case.
- In all cases the main restrictions on disclosure of information are as follows:

A.C.N complies with the requirements of the Data Protection Act 1998, which allows for disclosure of personal data where this is necessary to protect their vital interests. Other statutory provisions may also be relevant, but in general, legislation does not prevent sharing of information if:

- those likely to be affected consent; or
- the public interest in safeguarding the person's welfare overrides the need to keep the information confidential; or
- it is considered the person is a danger to themselves or others; or disclosure is required under court or other legal obligation.

Whatever happens, we should always be open and honest with the individual.

Appendix 1

What is Abuse?

YOUNG PEOPLE

Defining abuse is complex and rests on many factors. The term “**abuse**” can be widely interpreted. However, “abuse” is defined in the Department of Health No Secrets guidance as the “violation of an individual’s human and civil rights by any other person or persons.” Abuse may happen as the result of deliberate intent, negligence or ignorance. Here are some examples of abuse.

- **Physical abuse** This includes hitting, slapping, pushing, kicking, misuse of medical/chemical restraint or inappropriate sanctions.
- **Sexual abuse** This includes rape and sexual assault or sexual acts to which the child/vulnerable adult has not, or could not, consent and/or was pressured into consenting.
- **Psychological/emotional abuse** This includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, verbal or racial abuse, forced marriage, isolation or withdrawal of services or supportive networks.
- **Financial/ material abuse or CSE** This includes theft, fraud, exploitation; pressure in connection with wills, property, inheritance or financial transactions; or the misuses or misappropriation of property, possessions or benefits.
- **Neglect and acts of omission** This includes ignoring medical or physical care needs; failure to provide access to appropriate health, social care or educational services; the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Institutional abuse** this is repeated instances of poor care of individuals or groups of individuals. It can be through neglect or poor professional practice as a result of structures, policies, processes and practices within an organisation. While this in no way condones the abusive practice on the part of individuals, it recognises the powerful influence that organisational culture has on an individual’s behaviour

ADULT

Everyone has the right to live in safety, free from abuse and neglect.

Abuse and neglect can occur anywhere: in your own home or a public place, while you are in hospital or attending a day centre, or in a college or care home.

You may be living alone or with others. The person causing the harm may be a stranger but, more often than not, you'll know and feel safe with them. They're usually in a position of trust and power, such as a health or care professional,

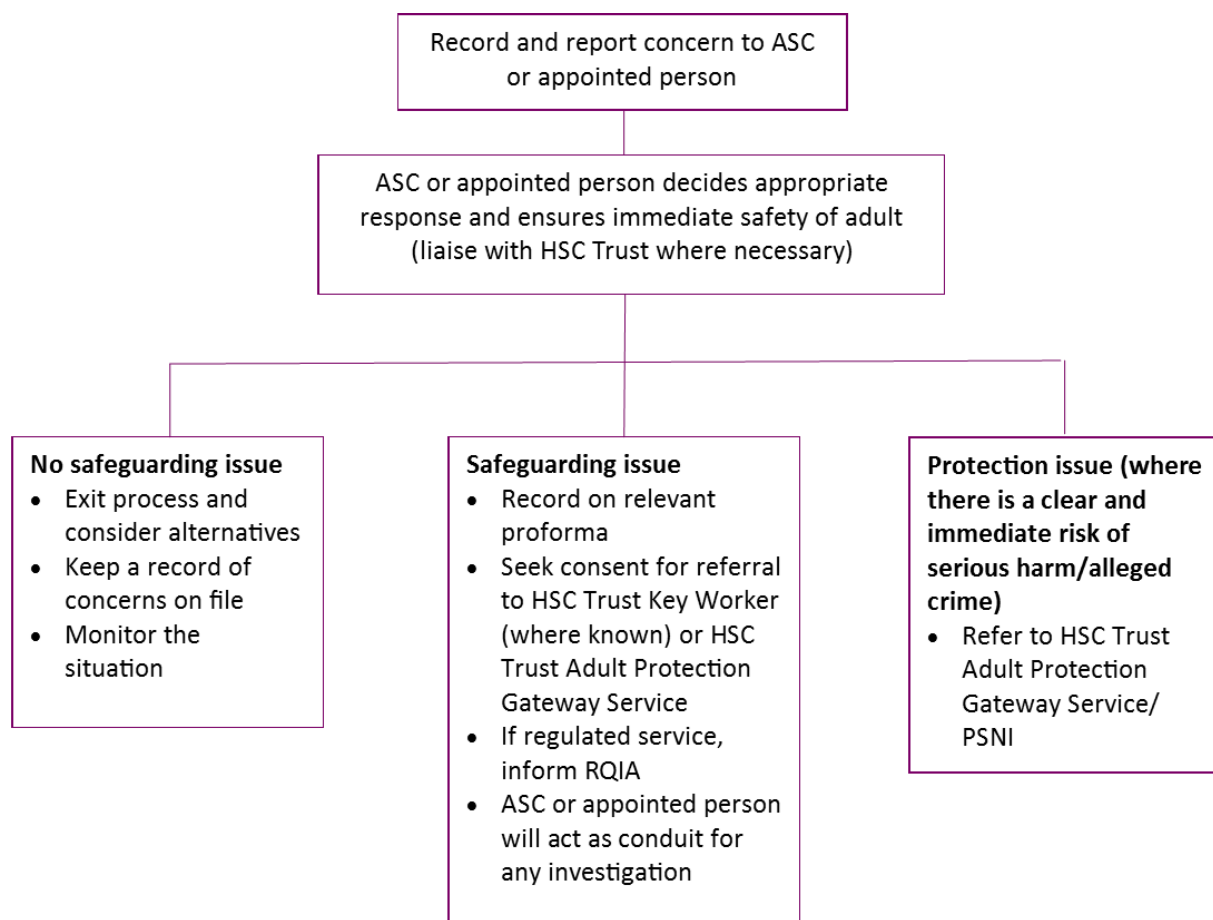
relative or neighbour. **Different forms of abuse and neglect** There are many forms of abuse and neglect.

Types of abuse:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect
- Exploitation

The above should not be considered an exclusive or even exhaustive list of the types of abuse which can be experienced by Young People and adults.

Responding flow chart to Adult Protection issue (NI):



Appendix 2

Staff Code of Behaviour

The duty to safeguard and promote the welfare of the participants in their charge rests with all members of staff. Implicit in it is the assumption that the conduct of all staff towards participants must be above reproach.

You can reduce likely situations for abuse of children and vulnerable adults and help protect yourself from false accusations by making sure that you are aware that, as a general rule, it doesn't make sense to...

- spend excessive amounts of time alone with children or vulnerable adults away from others.
- take children or adults alone in a car on journeys, however short.
- take children or adults to your home.

When it is unavoidable that these things do happen, they should only occur with the full knowledge and consent of the Line Manager and the young person's parent / person with parental responsibility where appropriate.

Staff should never:

- Engage in rough physical games including horseplay - apart from structured sports activities [and only with children and/or adults *at risk of harm* over age 16years].
- engage in sexually provocative games.
- allow or engage in inappropriate touching of any form.
- allow young people to use inappropriate language unchallenged.
- make sexually suggestive comments about or to a young person even in fun.
- let allegations in respect of a young person go unchallenged or unrecorded.
- do things of a personal nature for young people that the young person can do themselves.

It may sometimes be necessary for staff to do things of a personal nature for young people or vulnerable adults, particularly if they have disabilities. These tasks should be clearly described and should only be carried out with the full understanding and written consent of the parent / person with parental responsibility. In an emergency situation which requires this type of help, parents / those with parental responsibility should be fully informed, as soon as reasonably possible that it was necessary to provide such assistance.

In such situations, it is important that all staff are sensitive to the individual and undertake personal care tasks with the utmost discretion. Whenever possible a second member of staff should be informed in advance of, or as soon as

practically possible thereafter, of the need to perform an assisting task of a personal nature. A record should be maintained to this effect.

Staff should be particularly careful when supervising participant in a residential setting, or in approved out-of-hours activities, where more informal relationships tend to be usual.

Staff should avoid teaching materials, the choice of which might be misinterpreted and reflect upon the motives for the choice. If in doubt about the appropriateness of a particular teaching method, the academic should consult with their line manager before using it.

In all circumstances, employees' professional judgement will be exercised and for most this code of conduct will only serve to confirm what they have always done.

However, inappropriate actions in relation to any of the above may lead to staff disciplinary procedures being implemented.

SOCIAL MEDIA – E SAFETY

Introduction

This policy applies to all staff regardless of their employment status. It is to be read in conjunction with the Company's Electronic Information and Communications Systems Policy. This policy does not form part of the terms and conditions of an employee's employment with the Company and is not intended to have contractual effect. It does however set out the Company's current practices and required standards of conduct and all staff are required to comply with its contents. Breach of the provisions of this policy will be treated as a disciplinary offence which may result in disciplinary action up to and including summary dismissal in accordance with the Company's Disciplinary Policy and Procedure.

This policy may be amended from time to time and staff will be notified of any changes no later than one month from the date those changes are intended to take effect.

Purpose of this Policy

The Company recognises that the internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as

Facebook, Twitter, blogs and wikis. However, staff use of social media can pose risks to the Company's confidential and proprietary information, its reputation, and it can jeopardise our compliance with our legal obligations.

To minimise these risks, to avoid loss of productivity and to ensure that our IT resources and communications systems are used only for appropriate work-

related purposes, all Company staff are required to comply with the provisions in this policy.

Who is covered by this Policy?

This policy covers all individuals working at all levels and grades within the Company, including directors, senior managers, managers, supervisors, employees, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as "staff" in this policy).

Third parties who have access to our electronic communication systems and equipment are also required to comply with this policy.

Scope and Purpose of this Policy

This policy deals with the use of all forms of social media, which is a type of interactive online media which allows parties to communicate instantly with each other and share data in a public forum. This includes Facebook, LinkedIn, Twitter, Wikipedia, all other social networking sites, all other internet postings, including blogs including image sharing websites such as YouTube and Flickr.

Staff should be aware that there are many more examples of social media than can be listed in this policy and this is a constantly changing area. Staff should follow these guidelines in relation to any social media that they use.

This policy applies to the use of social media for both work and personal purposes, whether during work hours or otherwise. This policy applies regardless of whether the social media is accessed using our IT facilities and equipment or equipment belonging to members of staff.

Breach of this policy may result in disciplinary action up to and including dismissal.

Disciplinary action may be taken regardless of whether the breach is committed during working hours, and regardless of whether the Company's equipment or facilities are used for the purpose of committing the breach. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.

Staff may be required to remove internet postings which are deemed to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Personnel responsible for implementing the Policy

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with the Directors.

All managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and to take action when behaviour falls below its requirements.

All Company staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to your manager in the first instance. Questions regarding the content or application of this policy should be directed to the Chief Executive.

Compliance with related policies and agreements

Social media should never be used in a way that breaches any of our other policies. If an internet post would breach any of our policies in another forum, it will also breach them in an online forum. For example, employees are prohibited from using social media to:

- Breach our Electronic Information and Communications Systems Policy.
- Breach our obligations with respect to the rules of relevant regulatory bodies.
- Breach any obligations they may have relating to confidentiality.
- Breach our Disciplinary Rules.
- Defame or disparage the Company, its staff, customers, clients, affiliates, partners, suppliers, vendors or other stakeholders.
- Harass or bully other staff in any way or in breach of our Anti-harassment and Bullying Policy.
- Unlawfully discriminate against other staff or third parties or breach our Equal Opportunities Policy.
- Breach our Data Protection Policy (for example, never disclose personal information about a colleague online).
- Breach any other laws or ethical standards (for example, never use social media in a false or misleading way, such as claiming to be someone other than yourself or by making misleading statements).

Staff should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the Company and create legal liability for both the author of the reference and the organisation.

Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

Appendix 3

Contact details

Belfast

Safeguarding Champion Rachelle Mc Curry

Rachelle Mc Curry Director of Programmes

Email: Rachelle@activecommunities.org.uk

Contact Number: 07711557118

ADULT

Rachelle Mc Curry – Adult Safeguarding Champion

Victoria Moore – Adult Appointed Person

CHILD

Victoria Moore Project Manager

Email: Vicky@activecommunities.org.uk

Contact Number: 07706318162

Victoria Moore – Designated Officer for Safeguarding Children and Young People

Daniel Barkley – Deputy Officer for Safeguarding Children and Young People

Email: Dan@activecommunities.org.uk

Tel: 07845676510

Megan Finn- Deputy Officer for Safeguarding Children and Young People

Email: Meganf@activecommunities.org.uk

Tel: 07923252087

- Reporting chain (ie who reports to you).
- Where and how you record, and store concerns raised by staff, volunteers, partners and parents.
- Safeguarding and CP is on the agenda at every meeting; we have a risk register those details risk / potential risk for staff / young people.
- Who you report to your concerns to outside the Charity and their contact details.
- Who refer young people to if they have additional support or emotional needs (ie rape crisis) who can make those referrals, what the process is and contact details.
- We have no catalogue of referral agencies, but staff have a good knowledge base of bespoke support

services that they can support and connect young people with Specific locality-based issues where you might have different reporting protocols. (Ie gun threat) You will all have this sort of detailed procedure.

- There is no reporting protocol but these such issue are detailed in our risk register and discussed with DO. If a risk is 'live' the register will need a reporting narrative to describe what actions have been taken to mitigate risk and close the case.

Contact Numbers

- Gateway Social Services: (Belfast Trust): 02890507000
- Out of Hours Emergency Service: (Belfast Trust): 02890565444
- Gate way Out of Hours: (after 5pm, weekends, bank holidays) Regional: 0800 197 9995
- Police, Public Protection Unit (PPU's): 0845 600 8000
- (Covers all abuse relating to under 18's alongside vulnerable adults)
- NSPCC: 0800 800 500 (24 hrs)
- Social Services referrals for Vulnerable adults: 028 9056 5656