

# StEPs Safeguarding Policy and Procedures – August 2016



Name of organisation: St Albans Educational Partnership for Schools (StEPs)

Section heading	Section content
<p><b>1. Introduction</b></p>	<p>StEPs makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.</p> <p>StEPs comes into contact with children and / or vulnerable adults through the following activities: support services/project delivery/funding activities</p> <p>The types of contact with children and / or vulnerable adults will be regulated and /or controlled</p> <p>This policy seeks to ensure that StEPs undertakes its responsibilities with regard to protection of children and / or vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff in their practices and clarifies the organisation’s expectations.</p>
<p><b>2. Legislation</b></p>	<p>The principal pieces of legislation governing this policy are:</p> <ul style="list-style-type: none"> <li>○ Working together to safeguard Children 2010</li> <li>○ The Children Act 1989</li> <li>○ The Adoption and Children Act 2002:</li> <li>○ The Children act 2004</li> <li>○ Safeguarding Vulnerable Groups Act 2006</li> <li>○ Care Standards Act 2000</li> <li>○ Public Interest Disclosure Act 1998</li> <li>○ The Police Act – CRB 1997</li> <li>○ Mental Health Act 1983</li> <li>○ NHS and Community Care Act 1990</li> <li>○ Rehabilitation of Offenders Act 1974</li> </ul>
<p><b>3. Definitions</b></p>	<p>Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.</p> <p>Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.</p> <p>It can take a number of forms, including the following:</p> <ul style="list-style-type: none"> <li>● Physical abuse</li> <li>● Sexual abuse</li> <li>● Emotional abuse</li> <li>● Bullying</li> </ul>

	<ul style="list-style-type: none"> <li>• Neglect</li> <li>• Financial (or material) abuse</li> </ul> <p>Definition of a child A child is under the age of 18 (as defined in the United Nations convention on the Rights of a Child).</p> <p>Definition of Vulnerable Adults A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. This <b>may</b> include a person who:</p> <ul style="list-style-type: none"> <li>• Is elderly and frail</li> <li>• Has a mental illness including dementia</li> <li>• Has a physical or sensory disability</li> <li>• Has a learning disability</li> <li>• Has a severe physical illness</li> <li>• Is a substance misuser</li> <li>• Is homeless</li> </ul>
<p><b>4. Responsibilities</b></p>	<p><b>All staff</b> (paid or unpaid) have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.</p> <p><b>Additional specific responsibilities</b></p> <p>Trustees have responsibility to ensure that the policy is in place and appropriate</p> <p>Directors have responsibility to ensure that the policy is implemented</p> <p>The Designated Senior Manager is Nikki Howes. This person’s responsibilities are:</p> <ul style="list-style-type: none"> <li>• The policy is in place and appropriate</li> <li>• The policy is accessible</li> <li>• The policy is implemented</li> <li>• The policy is monitored and reviewed Liaison with and monitoring the Designated Senior Manager work</li> <li>• Sufficient resources (time and money) are allocated to ensure that the policy can be effectively implemented</li> <li>• Promoting the welfare of children and vulnerable adults</li> <li>• Ensure staff (paid and unpaid) have access to appropriate training/information</li> <li>• Receive staff concerns about safeguarding and respond to all seriously, swiftly and appropriately</li> <li>• Keep up to date with local arrangements for safeguarding and CRB</li> <li>• Develop and maintain effective links with relevant agencies.</li> <li>• Take forward concerns about responses</li> </ul>

## 5. Implementation Stages

The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation. These include:

- Whistleblowing –ability to inform on other staff/ practices within the organisation
- Grievance and disciplinary procedures – to address breaches of procedures/ policies
- Health and Safety policy, including lone working procedures, mitigating risk to staff and clients
- Equal Opportunities policy– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory
- Data protection (how records are stored and access to those records)
- Confidentiality (or limited confidentiality policy) ensuring that service users are aware of your duty to disclose
- Staff induction
- Staff training

### Safe recruitment

StEPs ensures safe recruitment through the following processes:

- Providing the following safeguarding statement in recruitment adverts or application details –‘recruitment is done in line with safe recruitment practices.’
- Job or role descriptions for all roles involving contact with children and / or vulnerable adults will contain reference to safeguarding responsibilities.
- There are person specifications for roles which contain a statement on core competency with regard to child/ vulnerable adult protection/ safeguarding
- Shortlisting is based on formal application processes/forms and not on provision of CVs
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- CRB checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults. Portable/ carry over DBS checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts.
- No formal job offers are made until after checks for suitability are completed (including DBS and 2 references). (You may wish to add in a qualifier about measures in place for exceptional and justifiable circumstances where employment/ role could commence prior to DBS clearance).

### DBS Records Gap Management

The organisation commits resources to providing DBS checks on staff (paid or unpaid) whose roles involve contact with children and /or vulnerable adults.

In order to avoid DBS gaps, the organisation will maintain and review a list of roles across the organisation which involve contact with children/ vulnerable adults

In addition to checks on recruitment for roles involving contact with children/ vulnerable adults, for established staff the following processes are in place

- There will be systematic checking of safeguarding arrangements of partner organisations
- Safeguarding will be a fixed agenda item on any partnership reporting meetings.

Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for

	<p>safeguarding and non compliance procedures</p> <p><b>Service delivery contracting and sub contracting</b></p> <ul style="list-style-type: none"> <li>• There will be systematic checking of safeguarding arrangements of partner organisations</li> <li>• Safeguarding will be a fixed agenda item on any partnership reporting meetings.</li> <li>• Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non compliance procedures</li> </ul>
<p><b>6. Communications training and support for staff</b></p>	<p>StEPs commits resources for induction, training of staff (paid and unpaid), effective communications and support mechanisms in relation to Safeguarding</p> <p><b>Induction</b> will include</p> <ul style="list-style-type: none"> <li>• Discussion of the Safeguarding Policy (and confirmation of understanding)</li> <li>• Discussion of other relevant policies</li> <li>• Ensure familiarity with reporting processes, the roles of line manager and Designated Senior Manager (and who acts in their absence)</li> <li>• Initial training on safeguarding including: safe working practices, safe recruitment, understanding child protection and the alerter guide for adult safeguarding</li> <li>• Formally assessing new members of staff's competence in applying safe practices (e.g. during probation period)</li> </ul> <p><b>Training</b> All staff who, through their role, are in contact with children and /or vulnerable adults will have access to safeguarding training at an appropriate level. Sources and types of training will include: Safeguarding Level 1 as a minimum Training from Herts Safeguarding Board</p> <p><b>Communications and discussion of safeguarding issues</b> Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice:</p> <ul style="list-style-type: none"> <li>• Team meetings</li> <li>• Board meetings</li> <li>• One to one meetings (formal or informal),</li> <li>• Clinical supervision</li> <li>• Participation in multi agency safeguarding procedures and meetings in order to be involved in child/ adult protection procedures</li> <li>• Participation in joint client visits</li> <li>• Involvement in the CAF process</li> <li>• Provision of a clear and effective reporting procedure which encourages reporting of concerns.</li> <li>• Encouraging open discussion (e.g. during supervision and team meetings) to identify and barriers to reporting so that they can be addressed.</li> <li>• Inclusion of safeguarding as a discussion prompt during supervision meetings/ appraisals to encourage reflection</li> <li>• Some organisations will have a safeguarding representatives team. If so it should be referred to in this section.</li> <li>• How staff are reminded about policies and procedures (refresh sessions etc)</li> </ul> <p><b>Support</b></p>

	<p>We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include:</p> <ul style="list-style-type: none"> <li>• Debriefing support for paid and unpaid staff so that they can reflect on the issues they have dealt with.</li> <li>• Seeking further support as appropriate e.g. access to counselling.</li> <li>• Staff who have initiated protection concerns will be contacted by line manager /DSM within 1 week</li> </ul>
<p><b>7. Professional boundaries</b></p>	<p>Professional boundaries are what define the limits of a relationship between a support worker and a client. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.</p> <p>StEPs expects staff to protect the professional integrity of themselves and the organisation. The following professional boundaries must be adhered to:</p> <ul style="list-style-type: none"> <li>• <b>Giving and receiving gifts from clients:</b> StEPs does not allow paid or unpaid staff to give gifts to or receive gifts from clients. However gifts may be provided by the organisation as part of a planned activity</li> <li>• Personal relationships between a member of staff (paid or unpaid) and a client who is a current service user is prohibited. This includes relationships through social networking sites such as facebook and bebo. It is also prohibited to enter into a personal relationship with a person who has been a service user over the past 12 months.</li> <li>• Use of abusive language</li> <li>• Response to inappropriate behaviour / language</li> <li>• Use of punishment or chastisement</li> <li>• Passing on service users' personal contact details</li> <li>• Degree of accessibility to service users (e.g. not providing personal contact details)</li> <li>• Taking family members to a client's home</li> <li>• Selling to or buying items from a service user</li> <li>• Accepting responsibility for any valuables on behalf of a client</li> <li>• Accepting money as a gift/ Borrowing money from or lending money to service users</li> <li>• Personal relationships with a third party related to or known to service users</li> <li>• Accepting gifts/ rewards or hospitality from organisation as an inducement for either doing/ not doing something in their official capacity</li> <li>• Cautious of, or avoidance of personal contact with clients</li> </ul> <p>The following policies also contain guidance on staff (paid or unpaid) conduct:</p> <ul style="list-style-type: none"> <li>• Code of conduct</li> <li>• Esafety policy</li> <li>• Lone working policy</li> </ul> <p>If the professional boundaries and/or policies are breached this could result in disciplinary procedures or enactment of the allegation management procedures</p>

<p><b>8. Reporting</b></p>	<p>The process outlined below details the stages involved in raising and reporting safeguarding concerns at StEPs</p> <p style="text-align: center;">         Communicate your concerns with your immediate manager          ↓          Seek medical attention for the vulnerable person if needed          ↓          Discuss with parents of child          Or with vulnerable person.          Obtain permission to make referral if safe and appropriate          ↓          if needed seek advice from the Children and Families helpdesk or Adults helpdesk          ↓          Complete the Local Authority Safeguarding Vulnerable Groups Incident Report Form if required and submit to the local authority within 24 hours of making a contact          ↓          Ensure that feedback from the Local Authority is received and their response recorded       </p> <p>The local authority has a process for reporting and this must be adopted. Organisations will be expected to complete the local authorities initial contact form when informing them of a concern about a child.</p> <p>If the immediate manager is implicated, then refer to their line manager or peer.</p>
<p><b>9. Allegations Management</b></p>	<p>StEPs recognises its duty to report concerns or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation.</p> <p>The process for raising and dealing with allegations is as follows:        There should be a stated process for dealing with allegations against any professional or volunteer working for any organisation. There is an established allegations management procedure for working with children in Hertfordshire</p> <p>The simplest process would be:        First step: Any member of staff (paid or unpaid) from StEPs is required to report any concerns in the first instance to their line manager/ safeguarding manager. A written record of the concern will be completed.</p> <p>Second step- contact local authority for advice.        Third step – follow the advice provided</p> <p>Some organisations may prefer to include the full local authority process.</p>

	StEPs recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA), according to the ISA referral guidance document <a href="http://www.isa.gov.org.uk/PDF/ISA%20Referral%20Guidance%20%20V2009-02.pdf">http://www.isa.gov.org.uk/PDF/ISA%20Referral%20Guidance%20%20V2009-02.pdf</a>
<b>10. Monitoring</b>	<p>The organisation will monitor the following Safeguarding aspects:</p> <ul style="list-style-type: none"> <li>• Safe recruitment practices</li> <li>• DBS checks undertaken</li> <li>• References applied for new staff</li> <li>• Records made and kept of supervision sessions</li> <li>• Training – register/ record of staff training on child/ vulnerable adult protection</li> <li>• Monitoring whether concerns are being reported and actioned</li> <li>• Checking that policies are up to date and relevant</li> <li>• Reviewing the current reporting procedure in place</li> <li>• Presence and action of Designated senior manager responsible for Safeguarding is in post</li> </ul>
<b>12.Managing information</b>	<p>Information will be gathered, recorded and stored in accordance with the following policies Data Protection Policy, Confidentiality Policy</p> <p>All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Senior Manager.</p> <p>All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets.</p>
<b>11. Conflict resolution and complaints</b>	<p>StEPs has a complaints policy and if necessary this will be taken forward by Nikki Howes</p> <p>Conflicts in respect of safety of vulnerable adults will be taken forward by Nikki Howes</p>
<b>12. Communicating and reviewing the policy</b>	<p>StEPs will make clients aware of the Safeguarding Policy through the following means</p> <ul style="list-style-type: none"> <li>• a statement to customers about safeguarding arrangements will be produced and displayed on the website.</li> <li>• A clear complaints policy/procedure will be available on the website</li> </ul> <p>This policy will be reviewed by Nikki Howes every year and when there are changes in legislation.</p>

Signed \_\_\_\_\_ Date \_\_\_\_\_

Name \_\_\_\_\_ Position \_\_\_\_\_