



## **Safeguarding Policy**

ACE Ltd.



### Ratification

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ACE Ltd.



## **Introduction**

This policy is to provide information on the procedures in place to safeguard all those using the services of ACE:

- To protect vulnerable people from abuse, neglect, and improper treatment
- To detail the procedure for responding to any allegation of abuse, neglect, or improper treatment
- To provide all staff with the necessary information to enable them to meet their safeguarding responsibilities.
- To ensure consistent good practice.
- To demonstrate the company's commitment regarding safeguarding
- To work within legislative framework and within local area protocols

Azalea Care and Education (ACE) believe that no vulnerable person should ever experience abuse of any kind. We have a responsibility to promote the welfare of the people we care for and to keep them safe. We are committed to practice in a way that protects them.

The welfare of our service users is paramount. All people, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.

All staff have an ethical and professional duty of care to act if they witness, or are told, or have any suspicion that may suggest a service user is at risk of harm or abuse.

This policy covers four main areas:

- Preventing Abuse
- Recognising abuse
- Responding to concerns about possible abuse
- Governance

## **Preventing Abuse**

The organisation ensures that ACE has:

- An RI who is involved with the daily running of the organisation as well as attending regular safeguarding meetings with staff and management.
- An on call member of management to speak to during work hours
- Access to the safeguarding policy and procedures that are consistent with LSCB requirements, reviewed annually and made available on request.
- Procedures for dealing with allegations of abuse made against members of staff.
- Safer recruitment procedures that include the requirement for appropriate checks



- A training strategy that ensures all staff complete safeguarding training on induction, with refresher training each year.
- A whistle blowing policy to enable concerns to be raised anonymously.
- Easy access to RI for all staff.

### **Staff Training**

All staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff will receive training during their induction. All staff will receive training that is updated at least every year.

### **Safer Recruitment**

All those involved in the recruitment of staff will undertake training in safer recruitment. Safer recruitment means that all applicants will:

- Complete an application form.
- Provide at least two referees to cover the last three years of employment. If an applicant has had more than two jobs in the last three years, additional references may be requested.
- Provide evidence of identity and qualifications.
- Be checked through the disclosure and barring service (DBS) as appropriate to their role prior to starting with the company.
- Be formally interviewed following the short-listing process.
- Have reasons for leaving all relevant employment and/or any gaps in employment, validated.

All new members of staff will undergo an induction. Within this process staff undertake safeguarding training that includes:

- Knowledge of Safeguarding Legislation.
- Understanding the definition of abuse.
- Understand the definition of significant harm.
- Knowledge of the different types of abuse and indicators of abuse.
- Know how to raise concerns.
- Understanding the referral process in relation to safeguarding.
- Understanding the see it, stop it, report it ethos.

### **Recognising Abuse**

To ensure that all vulnerable people are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a vulnerable person by inflicting harm, for example by hitting them, or by failing to act to prevent harm, such as leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

The Social Services and Wellbeing Act 2014(SSWBA) refers to the five main categories of abuse:



- Physical abuse
- Sexual abuse
- Psychological abuse
- Emotional abuse
- Financial abuse

### **Physical abuse**

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

### **Sexual abuse**

Sexual abuse involves forcing or enticing a vulnerable person to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving the vulnerable person in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways.

### **Psychological abuse**

Psychological abuse is a form of abuse, characterised by a person subjecting, or exposing, another person to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a vulnerable person, such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only for meeting the needs of another person. It may feature age or developmentally-inappropriate expectations being imposed on them. These may include interactions that are beyond the vulnerable person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another person. It may involve serious bullying, causing them to feel frightened or in danger, or the exploitation of the vulnerable person. Some level of emotional abuse is involved in all types of maltreatment, although it may occur alone.

### **Financial abuse**

Acts by others resulting in misuse or misappropriation of money, property, and possessions and/or blocking access to these and other material goods. This includes the theft of items by another person, fraud, pressure around wills, property or inheritance, misuse, or misappropriation of benefits.

### **Bullying**

While bullying is not a separate category of abuse it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to 12 child suicides each year.



All incidences of bullying should be reported and dealt with in line with the safeguarding policy.

### **Neglect**

Neglect is the persistent failure to meet a vulnerable person's basic physical and/or psychological needs which is likely to result in the serious impairment of the vulnerable person's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. When caring for a vulnerable person, neglect may involve a parent or carer failing to provide adequate food, clothing, or shelter, including exclusion from home or abandonment; failing to protect them from physical and emotional harm or danger; failure to ensure adequate supervision, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of a vulnerable person's basic emotional needs.

### **Child Trafficking**

Trafficking is where a child or vulnerable person is tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. These people are trafficked for:

- Sexual exploitation.
- Benefit fraud.
- Forced marriage.
- Domestic slavery like cleaning, cooking, and childcare.
- Forced labour in factories or agriculture.
- Committing crimes, like begging, theft, working on cannabis farms or moving drugs.

Trafficked people experience many types of abuse and neglect. Traffickers use physical, sexual, and emotional abuse as a form of control. Children and service users are also likely to be physically and emotionally neglected and may be sexually exploited.

Knowing the signs of trafficking can help give a voice to victims. Sometimes they won't understand that what's happening to them is wrong. Or they might be scared to speak out.

It may not be obvious that someone has been trafficked, but you might notice unusual or unexpected things. They might:

- Spend a lot of time doing household chores.
- Rarely leave their house or have no time for playing.
- Be orphaned or living apart from their family.
- Live in low-standard accommodation.
- Be unsure which country, city, or town they're in.
- Can't or are reluctant to share personal information or where they live.
- Not be registered with a school or a GP practice.
- Have no access to their parents or guardians.
- Be seen in inappropriate places.
- Have money or things you wouldn't expect them to.



- Have injuries from workplace accidents.
- Give a prepared story which is very similar to stories given by other children.

Whilst the above refers to children, the same can be said of all vulnerable people.

### **Radicalisation and Extremism**

Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is a form of harm.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

The process of radicalisation may involve:

- being groomed online or in person.
- exploitation, including sexual exploitation.
- psychological manipulation.
- exposure to violent material and other inappropriate information.
- the risk of physical harm or death through extremist acts.

It happens gradually so vulnerable people who are affected may not realise what it is that they are being drawn into.

If a vulnerable person is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group, or cause. For example, they may:

- spend increasing amounts of time talking to people with extreme views (this includes online communication)
- change their style of dress or personal appearance.
- lose interest in friends and activities that are not associated with the extremist ideology, group, or cause.
- have material or symbols associated with an extreme cause.
- try to recruit others to join the cause.

### **County Lines**

Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks groom and exploit vulnerable people to sell drugs. Often these people are made to travel across counties, and they use dedicated mobile phones to supply drugs.

Criminals are deliberately targeting vulnerable people. These criminals groom victims into trafficking their drugs for them with promises of money, friendship, and status. Once they've been drawn in, they are controlled using threats, violence, and sexual abuse, leaving them traumatised and living in fear. The vulnerable person involved feel as if they have no choice but to continue doing what the criminals want.

The signs that a service user may be involved in county lines activity are:

- Returning home late, staying out all night or going missing.

- Being found in areas away from home.
- Increasing drug use or being found to have large amounts of drugs on them.
- Being secretive about who they are talking to and where they are going.
- Unexplained absences from school, college, training, or work.
- Unexplained money, phone(s), clothes, or jewellery.
- Increasingly disruptive or aggressive behaviour.
- Using sexual, drug-related, or violent language you wouldn't expect them to know.
- Coming home with injuries or looking particularly dishevelled.
- Having hotel cards or keys to unknown places.

### **Indicators of abuse**

Any mark or injury to any service user should be recorded and reported to the manager, especially unexplained marks, or injuries. Body charts should be completed, and any concerns should be raised immediately especially if the service user has been involved in any incidents of behaviour that may have resulted in any safe holds.

Staff are also aware of the range of behavioural indicators of abuse and report any concerns to their manager.

All staff have a responsibility to report concerns but not to investigate or decide whether a service user has been abused.

A someone who is being abused or neglected may:

- Have bruises, bleeding, burns, fractures, or other injuries.
- Show signs of pain or discomfort.
- Keep arms and legs covered, even in warm weather.
- Be concerned about changing clothes in front of people.
- Look unkempt and uncared for.
- Change their eating habits.
- Have difficulty in making or sustaining friendships.
- Appear fearful.
- Be reckless with their own safety and the safety of others.
- Self-harm.
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn.
- Challenge authority.
- Become disinterested in activities.
- Be constantly tired or preoccupied.
- Be wary of physical contact.
- Be involved in, or particularly knowledgeable about drugs or alcohol.
- Display sexual knowledge or behaviour beyond that normally expected for their age.
- Appear out of sorts and show new behaviours.
- Discloses information.

### **Responding to concerns about possible abuse**





Staff are made aware of the process of raising concerns prior to starting work in the organisation, and the organisation use the “see it stop it report it” approach to concerns.

Staff are trained to recognise and report any concerns, by:

- Recording any concern on “Log My Care”.
- Contacting the on-call manager and informing them of the concerns before the end of the session if it is felt it is not safe for the service user to return home or directly after the care session if no immediate risk..
- The on-call manager will contact the appropriate MARF duty team if there is a concern about the service user returning home. Where no concern about service user returning home, their social worker will be contacted.
- The manager will make a referral to the local area safeguarding team – either a direct referral or via the social worker, or via the Emergency Duty Team if out of hours
- Measures will be put in place to safeguard the service user and any staff members implicated.
- The organisation will not investigate the concerns or gather evidence in relation to the concern, but will act in accordance with guidance from social care.
- If there is an allegation made about a staff member a referral will be made to the RI, who will interview relevant staff and make a decision as to next course of action.
- Staff may not receive any feedback once a concern has been logged due to data protection and confidentiality reasons, however if they do not feel that their concern has been treated seriously, they may speak to the RI or make a referral directly to the MARF duty team. Staff must be aware they may not be told the outcome of any referral.

#### **If you have concerns about a colleague/ staff member/ vulnerable person within the organisation**

Staff who are concerned about the conduct of a colleague towards a service user are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague’s career. **All staff must remember that the welfare of the vulnerable person is paramount.**

The company’s whistle blowing code enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns of poor practice or abuse by colleagues MUST be reported to the Manager – if the concern is about the manager the concern should be raised with the RI.

#### **Abuse of trust**

All staff are aware that inappropriate behaviour towards our service users is unacceptable and that their conduct towards them must be beyond reproach. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the company and a vulnerable person using the services of the company may be a criminal offence, even if that person is over the age of consent.



### **Good practice guidelines**

To meet and maintain our responsibilities towards the service users we care for, we need to agree standards of good practice. These are shared with staff when they start to work in the organisation. All staff are asked to download the “Wales Safeguarding Procedures” app for their phones so that all relevant information is easily accessible.

### **Complaints procedure**

Our complaints procedure will be followed where a service user, parent or social worker raises a concern about poor practice towards a service user that initially does not reach the threshold for safeguarding.

An explanation of the complaint’s procedure is available on request.

Complaints from staff are dealt with under the company’s complaints procedures.

### **Staff who are the subject of an allegation**

When an allegation is made against a member of staff, set procedures must be followed.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended without prejudice where this is deemed to be the best way to ensure that those in our care and the staff members are protected. Staff are encouraged to contact their trade union if subject to an allegation. All staff are encouraged to join an appropriate trade union.

The following criteria will be considered when the decision on whether or not to suspend staff is made. A staff member will be suspended if it is alleged that they:

- Behaved in a way that has harmed or may have harmed a vulnerable person.
- Possibly committed a criminal offence against or related to a vulnerable person.
- Behaved towards a vulnerable person in a way that indicates s/he is unsuitable to work with them.
- Behaved in a manner which is in breach of the Social Care Wales Code of Conduct

### **If a service user discloses to you**

It takes a lot of courage for a someone to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell, they may have lost all trust in people, or they may believe, or have been told, that the abuse is their own fault.

If a service user communicates to you about any risks to their safety or wellbeing, you will need to let them know that you must pass the information on – you are not allowed to keep secrets.

During your conversation with the service user:



- Tell them you cannot keep secrets and must pass the information on.
- Allow them to speak freely.
- Remain calm and do not overreact – they may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for them.
- Under no circumstances ask investigative questions.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to one who has been abused.
- Tell the service user what will happen next.
- Follow recording procedures as detailed above.
- Seek support if you feel distressed from the manager and your union.
- Do not discuss this with colleagues or friends and ensure confidentiality is maintained.

### **Notifying Parents/Families**

The organisation will not disclose a safeguarding concern raised by a service user with the parent/carer until they have notified social services and taken guidance from them.

### **Confidentiality and sharing information.**

All staff will understand that safeguarding issues warrant a very high level of confidentiality and that any breach of confidentiality may affect the legal process, compromising evidence. Breaching confidentiality will be treated as a disciplinary issue.

Staff should only discuss concerns with the Manager or RI. That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

Service user protection information will be stored and handled in line with Data Protection Act 1998 principles.

Information is:

- Processed for limited purposes.
- Adequate, relevant, and not excessive.
- Accurate.
- Kept no longer than necessary.
- Processed in accordance with the data subject’s rights.
- Secure.
- Not passed to third parties.

Written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant people.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. Service user safeguarding information will be stored separately from the service user’s case file and the case



file will be 'tagged' to indicate that separate information is held. The information may be held on their main file in the organisation under Service user Protection but access to this may be restricted and only certain people will be allowed access to it. These records are normally exempt from the disclosure provisions of the Data Protection Act, which means that service users and parents do not have an automatic right to see them. If any member of staff receives a request from a service user or parent to see these records, they should refer the request to the Manager or RI.

The Data Protection Act does not prevent the organisation's staff from sharing information with relevant agencies, where that information may help to protect a vulnerable person.

The organisation's policy on confidentiality is available to parents and service users on request.

### **Governance and Monitoring:**

Weekly management meetings will always include:

- safeguarding
- serious incident review
- caseload review

Annual Safeguarding report will be delivered to all staff.

Annual whole staff policy meeting to review organisation's policies.

### **Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy.

However, they may also share information directly with Social Care or the police if they are convinced that a direct report is the only way to ensure the child's safety.

### **Who to contact if you have a safeguarding concern.**

If you are worried that a child or service user is being abused or neglected you must report your concerns to your local Information, Advice and Assistance Service below:

#### ***Blaenau Gwent***

Tel: 01495 315700

Email: [DutyTeam@blaenau-gwent.gov.uk](mailto:DutyTeam@blaenau-gwent.gov.uk)

#### ***Caerphilly***

Tel: 0808 100 1727

Email: [contactandreferral@caerphilly.gov.uk](mailto:contactandreferral@caerphilly.gov.uk)

#### ***Monmouthshire***

Tel: 01291 635 669

Email: [ChildDuty@monmouthshire.gov.uk](mailto:ChildDuty@monmouthshire.gov.uk)



**Newport**

Tel: 01633 656656

Email: [children.duty@newport.gov.uk](mailto:children.duty@newport.gov.uk)

**Torfaen**

Tel: 01495 762200

Email: [socialcarecalltorfaen@torfaen.gov.uk](mailto:socialcarecalltorfaen@torfaen.gov.uk)

After 5pm and on weekends and bank holidays please contact the **South East Wales Emergency Duty Team on 0800 328 4432.**

If you think a child or service user is in immediate danger, then contact the Police on 999

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