Safeguarding Procedure – protecting children and vulnerable adults

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Introduction
CILEx respects that all individuals regardless of race, gender, disability, religion, sexual orientation, family status, age or social background have a right to equal protection from all types of harm of abuse.

Protecting people health, wellbeing and human rights and enabling them to live free from harm, exploitation, victimisation, abuse, neglect, sexual misconduct and violence is fundamental to creating a safe environment. In turn, these experiences impact on the working of those directly, or indirectly affected by such behaviours. Abusive behaviours can take many forms including, but, not, limited to:

- Physical abuse
- Emotional or psychological abuse
- Sexual abuse
- Neglect
- Domestic abuse
- Financial abuse
- Discriminatory abuse
- Modern slavery

For more information about definitions of abuse, please see Appendix A.

This procedure applies for everyone in CILEx who are in direct contact\(^1\) with children under 18 and vulnerable adults. All allegations will be taken seriously and handled in accordance with this guidance as CILEx recognise that safeguarding is everyone’s responsibility. All referrals will be investigated by the Group Safeguarding Officer and when the allegations are against CILEx employee, the Human Resources Director will also be involved.

Safeguarding is everyone’s responsibility. CILEx is committed to creating and sustaining a culture of vigilance among employees and everyone who works on behalf of CILEx to recognise, respond, record and report safeguarding concerns and provide an appropriate response. For more information regarding safeguarding definition, please see Appendix B.

It is not our responsibility to make judgements about safeguarding concerns reported, but to ensure they are processed and referred on where appropriate.

Wherever possible and appropriate, we seek the consent of the subject of a safeguarding concern in order to share their information with an external agency, for example, a social services department.

There are two key areas in which safeguarding issues may be raised:

- the conduct of the employees or everyone who works on behalf of CILEx towards children and vulnerable adults with whom they come into contact,

\(^1\) In this document, direct contact means any kind of communication with children and vulnerable adults face-to-face, on-line (any kind of electronical communications, which include but it is not limited to: email, video conference, social media platforms, etc), by telephone, letter, or any other type of communication.
whether in person, on-line, by telephone, letter, or any other type of communication;
  - children or vulnerable adults’ disclosure of information regarding their personal welfare, or the welfare of one of their peers, to the employees or anyone who works on behalf of CILEx, whether directly or through any kind of communications.

Our responsibilities
All employees are expected to understand and adhere to the principles set out in this Policy, as well as prevent, detect and report any forms of safeguarding concerns.

CILEx management are responsible for leading by example on safeguarding and ensuring the safeguarding provision is adequately resourced.

Human Resources are responsible for ensuring all employees are trained in safeguarding matters and guarantee safer recruitment checks are carried out such as Disclosure and Barring Services (DBS).

It is the responsibility of the Group Safeguarding Officer to ensure that this document is up to date and reviewed regularly. The Safeguarding Policy and Procedure will be revised as necessary to take account of stakeholder feedback, recommendations from the regulatory authorities, changes in legislation, or other relevant factors.

Questions or concerns relating to this document should be addressed to the Group Safeguarding Officer. Email: privacyofficer@cilex.org.uk

Group Safeguarding Officer Responsibilities
The Group Safeguarding Officer is responsible for:

  - Reviewing the Safeguarding Policy and Procedures at least annually;
  - Providing advice and support on issues relating to young or vulnerable people’s protection;
  - Providing guidance to children and vulnerable adults about how to obtain suitable support relating to safeguarding issues;
  - Maintaining a proper record of any referral, complaint or concern;
  - Monitoring the completion of safeguarding training;
  - Keeping abreast of all regulations and requirements regarding safeguarding.

Investigating an allegation
All referrals will be investigated by the Group Safeguarding Officer.

If you would like to declare a relevant safeguarding concern, you should complete the Safeguarding Issue Report Form (see Appendix C) which should be referred to the Group Safeguarding Officer for further investigation. In this situation, further information is likely to be requested and documentary evidence required.

Note that any report or documentary evidence submitted by email should be in a separate password protected word document. The password for the document should
be sent in a separate email. This information must be sent to the Group Safeguarding Officer at privacyofficer@cilex.org.uk

Following the results of the investigation and considering the circumstances of the referral or allegation made, the Group Safeguarding Officer may need to contact external agencies, who may conduct their own investigation (see Appendix D).

If a referral to an external service or agency is not required, following completion of all necessary investigations, the Group Safeguarding Officer will decide on an outcome.

**Allegations against CILEx Employees**

Handling Allegations of harm or abuse.

All allegations will be taken seriously and handled in accordance with statutory guidance.

Any person who has a concern about an employee or anyone who works on behalf of CILEx, should report the concern to the Group Safeguarding Officer and complete the Safeguarding Issue Report Form (see Appendix C).

The Group Safeguarding Officer will alert the Human Resources Director that a safeguarding case has been raised.

Following the results of the investigation and considering the circumstances of the referral or allegation made, the Group Safeguarding Officer may need to contact external agencies, who may conduct their own investigation.

If a referral to an external service or agency is not required, following completion of all necessary investigations, the Group Safeguarding Officer jointly with the Director of the Human Resources will decide on an outcome.

All the cases concerning to CILEx Regulation employees will be dealt independently by the Director of Human Resources, who shall carry out the relevant investigation and will independently decide on an outcome.

**Records Management**

All reported concerns/allegations will be treated in the strictest confidence and only those individuals who need to be involved in an investigation will be.

CILEx is committed to complying to the regulations of GDPR legislation and any personal data created as part of this policy will be processed in accordance with CILEX’s Privacy Policy, Data Protection Policy and Archive, Retention and Destruction Policy. This includes ensuring data is held securely, is not disclosed unlawfully and is destroyed when no longer needed.

Written records are confidential and must be kept in a locked cabinet if hard copy or password protected in a restricted access folder if a soft copy. The subject of the record may access the record, but not any third parties other than designated employees.
The Group Safeguarding Officer will keep an electronic register of Safeguarding concerns for monitoring purposes. Access to electronic records will be restricted and password protected.

If an employee has any concerns about whether to share information, they should seek guidance from the Group Safeguarding Officer as soon as possible on a no names basis.

**Code of Conduct**

CILEx employees are expected to uphold the highest levels of professional conduct in their dealings with children or vulnerable adults.

This includes not only avoiding any physical, verbal or other conduct that could be construed as abusive, but also by not placing themselves in situations where they are open to false allegations and by protecting vulnerable individuals from possible abuse by others.

When in direct contact with children or vulnerable adults (see also Appendix E), CILEx employees or anyone who works on behalf of CILEx must:

- Be aware, at all times, of the effects and consequences that your words and actions might have;
- Be approachable, whilst maintaining a physical and professional distance;
- The interests of each child or adult at risk must be put first; all must be treated equally and with dignity and respect;
- All contact must be arranged within the normal working hours of the institution concerned;
- Treat all children and vulnerable adults equally, with respect and dignity;
- Immediately escalate safeguarding concerns to the Group Safeguarding Officer.

CILEx employees and anyone who works on behalf of CILEx should never:

- Be left unaccompanied with children or vulnerable adults;
- Be unnecessarily inquisitive;
- Make comments that could be misinterpreted, such as about an individual’s appearance;
- Arrange assessments at times that fall outside the normal timetable parameters of the centre;
- Meet a candidate other than in the agreed assessment venue at the agreed time;
- Exchange personal contact details.

**Prevent**

Prevent is a strand of the Government’s counter terrorism strategy, which raised an awareness of the specific need to safeguard children, young people and families from violent and non-violent extremism.
Prevent works with a wide range of sectors where there are risks of radicalisation which need to be addressed, including the education sectors, criminal justice, faith groups, the internet and health service.

You should not come across Prevent in your day to day working but should be aware of it. If you have any questions about Prevent, please refer them to the Group Safeguarding Officer (privacyofficer@cilex.org.uk).

The three objectives of the Prevent strategy are to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote those views;
- Provide practical help and support to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support;
- Work with a wide range of sectors where there are risks of radicalisation which need to be addressed, including the education sectors, criminal justice, faith groups, the internet and health service.
Appendix A Definitions of Abuse

This list is not exhaustive, and it is worth noting that all forms of abuse listed below are rarely found in isolation.

**Abuse**
A form of maltreatment. Somebody may abuse or neglect a child/vulnerable adult by inflicting harm of failing to act to prevent harm. Children/vulnerable adults may be abused in a family or in institutional or community setting by those know to them or, more rarely, by others.

**Physical abuse**
A form of abuse which may involve hitting, shaking, throwing, poisoning, or scalding, drowning, suffocating or otherwise causing physical harm to a child.

**Emotional abuse**
The persistent emotional maltreatment of a child/vulnerable adult such as to cause severe and adverse effects on the victim’s health.

**Sexual abuse**
Involves forcing or enticing or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether the victim is aware of what is happening.

**Children abuse**
A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult, or another child or children, Abuse can be physical, emotional, sexual, etc.

**Neglect**
The persistent failure to meet a child or vulnerable adult's basic physical and/or psychological need, likely to result in the serious impairment of the victim's health or development.

**Domestic abuse**
An incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in most cases by a partner or ex-partner, but also be a family member or carer.

**Financial/ Material abuse**
This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse of misappropriation of property, possessions or benefits.
Discriminatory abuse
A misuse of power that denies opportunity to a group or individual, usually motivated by victim's age, gender, sexuality, disability, religion, class culture, language, race or ethnic origin.

Risk to self and/or others
Self-Harm, suicidal tendencies or potential risk of harming others, which may or may not include young people. This may be because of an individual experiencing a significant level of personal, emotional trauma and or stress.

Cyberbullying
This is the use of communication technology to torment, threaten, harass, humiliate, embarrass or otherwise harm an individual by sending or posting text messages or pictures intended to do so.

Modern Slavery
- Recruitment or acquisition of a man, women or child;
- Means, i.e. through the use of force, deception, or coercion;
- Purpose, i.e. for the purpose of exploitation or forced labour.
Appendix B Definitions

Safeguarding
The statutory guidelines issued by the Department for Education, ‘Working together to safeguard children’, define safeguarding as:

- Protecting children from maltreatment;
- Preventing impairment of children’s health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes;
- Care and support statutory guidance define safeguarding for vulnerable adults;
- Protecting the rights of adults to live in safety, free from abuse and neglect;
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect;
- People and organisations making sure that the adult’s wellbeing is promoted including; where appropriate, taking into account their views, wishes, feelings and beliefs in deciding on any action;
- Recognising that the adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their circumstances and therefore potential risks to their safety or well-being.

Under 18’s
Under 18’s is referred to as young people, but they are classed as children under relevant statutory guidance. In this context, safeguarding is defined as protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection
Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Vulnerable adults
Safeguarding duties also apply to vulnerable adults. An adult is considered ‘vulnerable’ if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing or dressing.

The Care and Support Statutory Guidance 2017 states that the safeguarding duties apply to an adult who:

- has needs for care and support (whether the local authority is meeting any of those needs).
- is experiencing, or 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 or neglect.
Appendix C Safeguarding Issue Report Form

This form along with any accompanying material, should be sent to the Group Safeguarding Officer:

The Chartered Institute of Legal Executives, Kempston Manor, Kempston, Bedford MK42 7AB. Email: privacyofficer@cilex.org.uk

Please: **be specific** – what is the exact nature of the concern?

**show the evidence** – what did you see, hear? Who said what, when, how?

**be precise** about the time, if relevant

**State whether** you have a concern about an individual’s immediate safety

<table>
<thead>
<tr>
<th>Your name (please print):</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Your role with CILEx:</td>
<td></td>
</tr>
<tr>
<td>Email:</td>
<td></td>
</tr>
<tr>
<td>Daytime contact number:</td>
<td></td>
</tr>
<tr>
<td>Name of child or adult at risk (if known):</td>
<td></td>
</tr>
<tr>
<td>Name of Centre/Centre No</td>
<td></td>
</tr>
<tr>
<td>Centre Tel No.</td>
<td></td>
</tr>
<tr>
<td>Or</td>
<td></td>
</tr>
<tr>
<td>CILEx Location</td>
<td></td>
</tr>
</tbody>
</table>

**Date of Incident came to your attention:**

**Are you reporting** (please tick as appropriate)

- [ ] Your own concerns
- [ ] Concerns raised with you by someone else.
  
  If so, by whom?

<table>
<thead>
<tr>
<th>How did it come to your attention?</th>
<th></th>
</tr>
</thead>
</table>
Nature of concern:

| Have you or anyone else spoken with the child/vulnerable adult and/or parents/carers/other adult, OR with the person against whom the allegations have been made OR your manager?  
| If so, what was discussed? |

| Date reported to the Group Safeguarding Officer: |
| Details of any enclosures: |

If becoming aware of this incident has caused you distress, please contact your line manager or the Group Safeguarding Officer.
## Appendix D Helplines’ Directory

### Addiction
- Children of Addicted Parents and People (COAP) ........................................... [website](#)
- National Association for Children of Alcoholics ............................................ 0800 358 3456

Young People and Gambling ................................................................. 0808 8020 133

### Bereavement
- Child Bereavement Network ................................................................. [website](#)
- Child Death Helpline .............................................................................. 0800 282 986

Childhood Bereavement Network ......................................................... 020 7843 6309

Cruse Bereavement Care ................................................................. 0808 808 1677

Grief Encounter ..................................................................................... [website](#)

Hope Again ........................................................................................... 0808 808 1677

Winston’s Wish ................................................................................... 08088 020 021

### Bullying
- Anti-bullying alliance ......................................................................... [website](#)
- Bullying UK ........................................................................................ [website](#)

Ditch The Label ................................................................................... [website](#)

### Cancer
- Macmillan Cancer Support ............................................................... 0808 808 00 00

### Children of Prisoners
- National Information Centre on Children of Offenders ......................... [website](#)
- National Prisoners’ Families Helpline ................................................ 0808 808 2003

### Children Missing
- Runaway Helpline ................................................................................ 116 000

### Children’s Charities
- Action for Children ........................................................................... [website](#)
- Barnardos ........................................................................................ [website](#)

Childline .............................................................................................. 0800 1111

Children’s Society ............................................................................. [website](#)

NSPCC ............................................................................................... 0808 800 5000

British Association for Counselling and Psychotherapy ....................... [website](#)
Crime
Crime Stoppers ................................................................. 0800 555 111
Fearless (Crime Stoppers for Young People) ......................... website

Domestic Abuse
Galop (LGBT) ............................................................... 0800 999 5428
National Domestic Violence Helpline .................................. 0808 2000 247
Refuge ................................................................. 0808 2000 247

Drugs
Talk to Frank .............................................................. website

Faith
Muslim Youth Helpline ................................................... 0808 808 2008

FGM
Africans Unite Against Child Abuse ..................................... website
Daughters of Eve ............................................................ website
Forward UK .................................................................... 0208 960 4000
NSPCC FGM Helpline ....................................................... 0800 028 3550

Forced Marriage
Karma Nirvana .............................................................. 0800 5999 247

General
CLS Safeguarding Hotline ................................................... 01234 844324
LawCare ........................................................................ 0800 279 6888

Housing
Shelter ........................................................................... 0808 800 4444

LGBT
Stonewall ................................................................. 0207 593 1850
Coram Voice ................................................................. 0808 800 5792
The Care Advice Line ......................................................... 020 7017 8901

Mental Health
Anna Freud National Centre for Children & Families ................. website
Anxiety UK ...................................................................... 03444 775 774
B-eat eating disorders ....................................................... 0808 801 0711
Bipolar UK ................................................................. 0333 323 3880
CALM (Campaign Against Living Miserably) ........................................ 0800 58 58 58
Charlie Waller Memorial Trust .......................................................... website
HeadMeds ............................................................................................ website
Heads Together .................................................................................. website
Kooth .................................................................................................... website
Mentally Healthy Schools ................................................................. website
MindEd for Families .......................................................................... website
National Self Harm Network ......................................................... website
OCD Action ........................................................................................ website
OCD-UK .............................................................................................. website
Papyrus (Suicide support) ................................................................. website
Rethink Mental Illness ........................................................................ website
Samaritans .......................................................................................... 116 123
Sane ..................................................................................................... 0300 304 7000
Selfharm UK ..................................................................................... website
The Mix .............................................................................................. 0808 808 4994
The Royal College of Psychiatrists .................................................. website
Young Minds ..................................................................................... website
Young Minds Parents Helpline ....................................................... 0808 802 554

**Migrant Children**
Migrant Children’s Project .............................................................. 0207 636 8505

**Online Safety**
Child Exploitation Online Protection Centre .................................... website
National Professionals Online Safety Helpline ................................... 0344 381 4772
Net-Aware ........................................................................................ website
Safer Internet ...................................................................................... website
Think U Know ..................................................................................... website
Parent Line Plus ................................................................................. 0808 800 2222
Self-Harm
Harmless ................................................................. website
National Self Harm Network ........................................ website
Self-injury support (Girls) ................................................. 0808 800 8088

Sexual Abuse
MOSAC (Mothers of Sexually Abused Children) .................. 0800 980 1958
Stop It Now ........................................................................ 0808 1000 900
The Lucy Faithfull Foundation ............................................. 01527 591922

Sexual Health
Check Your Bits (Chlamydia Testing) ................................. website
Getting It On ...................................................................... website
Sexual Health Helpline ....................................................... 0300 123 7123
Brook .............................................................................. website

Staff Support
Education Support Partnership .......................................... 08000 562 561

Transgender
Gires ................................................................................ website
Mermaids .......................................................................... 0808 801 0400

Whistleblowing
NSPCC Whistleblowing Helpline ...................................... 0800 028 0285
Appendix E Handling Safeguarding Concerns

If a young person or a vulnerable adult tells an employee about possible harm or abuse, remember the “4 R’s”:

- **Receive** listen carefully to what is being said without displaying shock, disapproval or dismay;
- **Reassure** allow the person to speak freely ensuring you do not put words in their mouth;
- **Respond** reassure them that by telling you, they have done the right thing;
- **Record** explain to them that you may have to pass the information onto the Group Safeguarding Officer, but that only those the need to know about it will be told.

**Do**

- Do take contemporaneous notes or make notes as soon as possible after the conversation. Do not destroy any original notes;
- Do record in the note: the date, time, place, what the person said and did, and a full account of your conversation, any noticeable non-verbal behaviour and anything else. The note should include the persons wishes regarding the action to be taken. However, the person must be made aware that this will not affect a final decision as to action or referral;
- Do remind the person about the availability of external help;

**Do not**

- Do not investigate concerns or all allegations but report them immediately to the Group Safeguarding Officer;
- Do not interview the person concerned; listen, only asking questions when necessary to clarify in order to be sure that you understand what they are telling you;
- Do not promise to keep what they tell you confidential as this may not ultimately be in their best interests.

Any questions or concerns about CILEx Safeguarding, should be directed to the Group Safeguarding Officer.