

Procedure Name:	Safeguarding Procedure - Protecting Children and Vulnerable Adults
Procedure Ref:	PRO/SG/CC/SG/0002
Related Policy:	Safeguarding Policy – Protecting Children and Vulnerable Adults
Who it applies to:	CILEX Employees, Board and Committee Members, Trustees, Volunteers and Associated Persons
Date of Issue:	July 2020
Version:	1.3
Last Revision Date:	April 2021
Procedure Type:	Internal
Procedure Owner:	Corporate Compliance Manager
Approved By:	Corporate Policy Review Panel (CPRP)
Review Date:	April 2022
Company Policy relates to:	Group

Safeguarding Procedure - Protecting Children and Vulnerable Adults

Safeguarding Procedure - Protecting Children and Vulnerable Adults

Contents

Introduction	2
Our Responsibilities	3
Group Safeguarding Officer Responsibilities	3
Investigating an Allegation.....	3
Allegations against CILEX Employees	4
Records Management.....	4
Code of Conduct	4
Prevent.....	5
Appendix A: Definitions of Abuse	6
Appendix B: Definitions.....	8
Appendix D: Helplines’ Directory	12
Appendix E: Handling Safeguarding Concerns.....	16

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 or abuse.

Protecting people's 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 contact¹ 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 a 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 reported safeguarding concerns, 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, whether in person, online, 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.

¹ In this document, direct contact means any kind of communication with children and vulnerable adults face-to-face, on-line (any kind of electronic 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.

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 Officering 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 the Disclosure and Baring 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 into account 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 with 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 with the current UK Data Protection 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 a hard copy or password protected in a restricted access folder if an electronic copy. The subject of the record may access the record, but not any third parties other than Group 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 or by failing to act to prevent harm. Children/vulnerable adults may be abused in a family or in institutional or community setting by those who 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 a 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 maybe 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 and 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 could 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, woman 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 defines safeguarding for vulnerable adults;
- Protecting the rights of adults to live in safety and 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 have potential risks to their safety or wellbeing.

Under 18s

Under 18s are 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.

UK Data Protection Legislation

All applicable UK Data Protection and Privacy legislation in force from time to time, including the General Data Protection Regulation (EU) 2016/679, the UK Data Protection Act 2018 and the Privacy and Electronic Communications (EU Directive) Regulations 2003 (as amended) (PECR) and any

superseding legislation and all other applicable laws, regulations, statutory instruments and/or any codes, practice or guidelines issued by the relevant data protection or supervisory authority in force from time to time and applicable to a Party, relating to the processing of personal data and/or governing individual's rights to privacy.

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 and hear?
 Who said what, when and how?
be precise about the time, if relevant
State whether you have a concern about an individual’s immediate safety

Your Name (Please Print):	
Your role with CILEX:	
Email:	
Daytime Contact Number:	
Name of a child or an adult at risk (if known):	
Name of Centre/Centre No	
Centre Tel No.	
Or	
CILEX Location	
Date of Incident that it came to your attention:	
Are you reporting (please tick as appropriate)	<input type="checkbox"/> Your own concerns <input type="checkbox"/> Concerns raised with you by someone else. If so, by whom?
How did it come to your attention?	

Nature of the 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 802 0133

Bereavement

Child Bereavement Network	website
Child Death Helpline	0800 282 986
Childhood Bereavement Network	0207 843 6309
Cruse Bereavement Care	0808 808 1677
Grief Encounter	website
Hope Again	0808 808 1677
Winston's Wish	0808 802 0021

Bullying

Anti-Bullying Alliance	website
Bullying UK	website
Ditch The Label	website

Cancer

Macmillan Cancer Support	0808 808 0000
--------------------------------	---------------

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
Barnardo's	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 Hotline01234 844324

LawCare0800 279 6888

Housing

Shelter 0808 800 4444

LGBT

Stonewall 0207 593 1850

Coram Voice 0808 800 5792

The Care Advice Line 0207 017 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	0845 390 6232
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

Reassure

Respond

Record

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