



## Safeguarding Policy

### Safeguarding Statement

Safeguarding is everybody's responsibility. Kingston Centre for Independent Living (KCIL) is fully committed to safeguarding the welfare of all children, young people and adults who use our services by taking all reasonable steps to protect them from neglect, physical, sexual or emotional harm.

KCIL works with children, young people and adults who are considered to be from at risk groups. We provides a range of support services for people with disabilities including and advice, Self-Directed Support Services (SDS) and volunteering opportunities. Children, young people and adults will be recipients of our services and may have contact with workers in a wide range of ways. KCIL wishes to ensure that we maintain the highest possible standards to meet our responsibility to protect and safeguard those for whom it has responsibility.

Employees, casual and agency workers and volunteers (referred to in this policy as "workers") will at all times show respect and understanding for the rights, safety and welfare of our service users and conduct themselves in a way that reflect the principles of our organisation.

We will do this by:

- ensuring that all of our workers are carefully selected, trained and supervised, and that, where appropriate, Disclosure and Barring Scheme (DBS) checks are carried out
- assessing all risks that children, young people and adults encounter carefully and taking all necessary steps to minimise and manage them;
- letting service users and their parents/carers know how to voice concerns or complaints about anything that they may not be happy with;
- giving service users, parents/carers and workers information about what we do and what can be expected from us.
- ensuring that all of our workers are diligent in identifying possible abuse and that any such concerns are formally recorded, evaluated and shared with the appropriate agencies
- responding appropriately to allegations about our workers, with full investigation and, if appropriate, implementing the Disciplinary Procedure
- developing and implementing an appropriate monitoring and review system.

KCIL works closely with the Royal Borough of Kingston's (RBK) Adult Social Care Teams and the Kingston Clinical Commissioning Group reporting any safeguarding concerns to the Safeguarding Access Team. The team keeps up to date with training and legislation relevant to safeguarding adults. KCIL is also committed to working in partnership with Achieving for Children (Afc) in undertaking our responsibilities around the safeguarding of children and young people.

KCIL has adopted the following policies and procedures for workers to ensure the safety and well-being of children, young people and adults:

Equal Opportunities Policy, Acceptable Use of IT Policy, Complaints Procedure, Data Protection and Confidentiality Policy, Recruitment and Selection Policy, DBS Policy, and a Whistleblowing Policy

This policy details the procedures to follow when there is concern about the welfare of a child, a young person or an adult and/or when an allegation is made about a worker of the organisation. It also provides



information to ensure that workers of the organisation do not put people at risk. It is designed to protect both those in a position of trust and those for whom they have responsibility.

This policy is non-contractual but indicates the way in which KCIL intends to deal with such matters and applies to all employees, workers or volunteers whose duties bring them into contact with children, young people and/or adults at risk. The policy refers to all such people regardless of sex, race, disability, sexual orientation, religion or belief, age, marital status or civil partnership, pregnancy/maternity, gender reassignment or any other unrelated characteristic. Failure to comply with this policy will result in disciplinary action (for employees), and termination of a contract or agreement (for workers or volunteers).

## **Responsibilities**

The responsibility for introducing, implementing, and maintaining this Safeguarding Policy and those associated with it rests with the Board of Trustees for KCIL who will appoint a designated trustee (**Roberta Cole**) with responsibility for the monitoring of Safeguarding and whose contact details can be found *in the personnel files in the main office*.

Responsibility for the protection of children, young people and adults is delegated to the CEO on behalf of the Board.

**Joanna Aleksy, Support Broker**, is KCIL's designated Safeguarding Officer.

Protecting children, young people and adults who use our services from abuse is everyone's responsibility. As such, all workers of KCIL have a duty to raise concerns swiftly, without prejudice to their own position, about behaviour by workers, managers, trustees, volunteers, partners, stakeholders or others which may be harmful to those in their care, and will receive appropriate support when doing so.

## **Principles**

This policy is based on the following principles:

- an acknowledgement that children, young people and adults can be victims of physical, sexual and emotional abuse, neglect and bullying
- abuse can have serious and long term effects on all aspects of health, development and well being. Sustained abuse is likely to have a deep effect on self-image, self-esteem and future life
- the safety and welfare of children, young people and adults is paramount and is the responsibility of all workers in the organisation to help prevent abuse and to act on any concerns
- a child, young person or adult has the right to live in safety and be protected from abuse
- individuals must be listened to and any allegation or suspicion that they have been the victims of abuse or ill treatment will be taken seriously and responded to swiftly and appropriately
- those in a position of trust should have a clear understanding of the responsibilities this carries and should not abuse their position or put themselves in a position where allegations of abuse, whether justified or unfounded, could be made. KCIL recognises the potential of both men and women to abuse the position of trust.



We consider it our duty and will take all reasonable steps to:

- create and maintain an environment where children, young people and adults are safe and valued, and in which they can develop physically, emotionally and spiritually
- make available information to all on how to obtain advice, support and help if anyone has a concern or suspects a child, young person or adult is being harmed. This information will include guidelines on responding to and reporting such concerns
- plan activities and events taking into consideration the safety and well being of children, young people and adults and organise them in a way which minimises the possibility of them being harmed
- select and appoint leaders and managers of activities involving children, young people and adults only after a merit-based recruitment and selection practice, appropriate checks (including appropriate DBS checks) and other enquiries and considerations about their suitability for the work
- train, develop and provide updates for leaders and managers working with children, young people and adults and supervise and support them in the work they do.

## **Legislation**

There is a considerable body of legislation designed to ensure that vulnerable groups are protected and it is important to understand that everyone is responsible for their safety. In developing this policy we recognise a number of Acts and Regulations:

- Equality Act 2010
- The Care Act 2014
- The Crime and Disorder Act 1998
- The Criminal Justice Act 2003
- Criminal Justice and Immigration Act 2008
- National Care Standards Act 1998
- Human Rights Act 1998
- The Children Act 1989 England and Wales
- The Children Act 2004
- Protection of Children Act 1999/Criminal Justice and Court Services Act 2000
- The Children (Protection from Offenders) (Miscellaneous Amendments) Regulations 1997
- The United Nations Convention on the Rights of the Child
- The Police Act 1997
- Rehabilitation of Offenders Act 1974
- Health and Safety at Work Act 1974
- Safeguarding Vulnerable Groups Act 2006.
- Conduct of Employment Agencies and Employment Business Regulations 2003
- Data Protection Act 1998
- Mental Capacity Act 2005
- Protection from Harassment Act 1997
- The Fraud Act 2006
- Modern Slavery Act 2015
- Pan-London Guidance on Safeguarding Adults 2008



It is noted that one of the Acts listed above is the Data Protection Act. Any safeguarding issue shall take precedence over this Act, if the welfare or safety of a child or adult is, or is suspected of, being compromised.

## Definitions

A **child** is anyone under the age of 18. This is regardless of their personal circumstances; whether they are living independently, are in further education, are a member of the armed forces, are in hospital, in prison or a Young Offenders' Institution.

We use the term **young person** to refer to children under 18 but in their teens and engaged with our services.

An **adult** at risk refers to any person aged 18 or over who "...is or maybe in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to protect him or herself against significant harm or serious exploitation" ('Who Decides' Lord Chancellor's Office 1997).

Although the following list is not exhaustive, an adult at risk may be a person who:

- is frail due to age, ill health, physical disability or cognitive impairment, or a combination of these
- has a learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs including dementia or a personality disorder
- has a long-term illness/condition
- misuses substances or alcohol
- is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse
- is unable to demonstrate the capacity to make a decision and is in need of care and support.

For those who do not meet the criteria as an adult at risk of harm but who nevertheless appear to be at high risk there are alternative sources of referral and support. In such cases support may be found in operational procedures or processes.

However, just because someone is old, frail or has a disability, this does not mean they are inevitably 'at risk'.

**Safeguarding:** the steps organisations take individually, and working together, to protect children, young people and adults from abuse. This can include the policies and procedures adopted, the training given and processes and protocols in place to ensure the safety of others.

**Child protection and adult protection:** these are both a part of safeguarding. They refer to the activity undertaken to protect specific children, young people and adults who are suffering, or are likely to suffer, significant harm.

**Abuse:** It is the violation of an individual's human and civil rights by another person or persons. Abuse may be a single or repeated act. Abuse may result in harm to, or exploitation of, the person subjected to it. There are several types of possible abuse:



## Forms of abuse or mistreatment

Abuse or mistreatment, as a violation of an individual's human or civil rights by another person or persons:

- may consist of a single act or repeated acts
- can occur in any relationship or setting
- may result in harm to, or serious exploitation of, the person subjected to it, and may constitute a criminal offence.

There are several main forms of abuse, although there are variations within these:

### 1. **Discriminatory abuse**

Discriminatory abuse can be on the grounds of any of the nine protected characteristics named in the Equality Act 2010: age, gender, race, disability, sexual orientation, marriage/civil partnership, pregnancy/maternity, religion or belief and gender reassignment. Discriminatory abuse also incorporates hate crime and mate crime. Mate crime occurs when children, young people or adults at risk are befriended with the intention to abuse.

### 2. **Emotional or Psychological Abuse**

This involves the persistent emotional ill treatment of a child, young person or adult such as to cause a severe and adverse effect on their emotional development. As well as persistent lack of love and attention, this can include intimidation, humiliation, constant criticism, threats, taunting and words and action that demean the person. It may involve emotional blackmail, denial of basic human rights, conveying to the child or person that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may involve causing a child, young person or adult to feel frightened or in danger, or the exploitation or corruption of children, young people or adults. It may involve preventing someone from enjoying activities and/or meeting friends. There is some level of emotional abuse in all types of abuse, but it can also occur alone.

### 3. **Physical Abuse**

This involves physical injuries where there is no satisfactory explanation or definite knowledge or where there is a reasonable suspicion that the injury was inflicted with intent, caused through lack of care by a person having custody, charge or care of the individual. It includes hitting, shaking, throwing, squeezing, burning and biting as well as giving inappropriate drugs or poisonous substances. It also includes attempted suffocation or drowning and fabricating the symptoms of an illness. Reasonable physical restraint to prevent a vulnerable person from harming themselves, another person or from causing serious damage to property is not deemed to be abuse.

### 4. **Sexual Abuse**

This involves forcing or enticing a child, young person or adult to take part in sexual activities (whether or not the individual is aware of what is happening) and involves the use of children, young people and/or adults by other persons, both male and female, to meet their own sexual needs. If an individual is pressurised to do something sexual against their will, it is a form of sexual abuse. This could be direct sexual activity, penetrative or non-penetrative acts, unwanted touching, taking indecent photographs or videos, showing pornographic material or encouraging them to behave in sexually inappropriate ways. Sexual assault, sex with children under the age of 16, incest, rape by a stranger or inside marriage, are all crimes and matters for the police. Sex without a person's consent due to drugs or alcohol or unconsciousness is abusive.



**5. Domestic Abuse**

This is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between individuals aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexual orientation. Abuse may be psychological, physical, sexual, financial and/or emotional.

**6. Financial or material abuse:**

This can take the form of theft, fraud, exploitation, the misuse or misappropriation of property without the individual's permission. This could involve large sums of money or just small amounts from a pension or allowance each week.

**7. Institutional abuse:**

This is different from other categories because it is about who abuses and how that comes to pass, rather than about types of harm. Abuse can occur in a relationship, family, service or institution and it can be perpetrated by an individual or more collectively, by a regime.

**8. Neglect**

This involves failure to meet the vulnerable individual's physical and/or psychological needs and is likely to result in the serious impairment of their health or development. It may involve a failure to provide food, warmth, clothing, love, affection, attention and recognition, or a failure to protect a child, young person or adult from physical harm or danger, a failure to protect from physical harm or danger or a failure to ensure access to appropriate medical care or treatment.

**9. Bullying**

This is deliberate, hurtful behaviour, usually repeated over a period of time where it is difficult for those being bullied to defend themselves. It may be related to any personal characteristic of the person (whether perceived or real), or by association (i.e. related to the person's relationship or dealings with others who have that personal characteristic). Bullying can be verbal, written or physical and can take many forms, from relatively mild banter to actual physical violence.

**10. Modern Slavery**

Modern Slavery is a term used to cover offences in the Modern Slavery Act 2015, slavery, servitude and forced or compulsory labour, and human trafficking.

- *Slavery*: slavery is defined as behaviour on the part of an offender as if they had a right of legal ownership over a person, which deprives the victim of their freedom
- *Servitude*: is the obligation to provide services that is imposed by the use of coercion and includes the obligation for the individual to live on another person's property and the impossibility of changing his or her condition
- *Forced or compulsory labour*: is defined as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered him/herself voluntarily
- *Human trafficking*: requires that a person arranges or facilitates the travel of another person with a view to that person being exploited.

**11. Child Sexual Exploitation**

Sexual exploitation of children and young people involves exploitative situations, contexts and relationships when children or young people receive "something" (e.g. food, accommodation, drugs, alcohol, gifts, money etc) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the individual's immediate recognition, e.g. being persuaded to post or send



sexual images on the internet/phones without immediate payment or gain. In all cases, those exploiting the individual have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violent, coercion and intimidation are common, and exploitative relationships are characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

## **Recognition of Abuse**

Abuse can and does occur within families and in institutional or community settings. KCIL acknowledges that some individuals seek to use community and voluntary organisations to access children, young people and adults and that it is necessary to have an open mind when the possibility arises that a worker at the organisation, a parent or another is suspected of abuse or inappropriate activity. Appendix 2 describes signs that may indicate that a child, young person or adult is being or has been abused.

The recognition of abuse is not always easy and KCIL acknowledges that its' workers may not be experienced in this area and will not easily know whether or not abuse is taking place. Indeed, it is not the place of KCIL workers to make such a judgement. However the first priority of workers at KCIL should always be to ensure the safety and protection of children, young people and adults, and it is the responsibility of all workers to act on any suspicion or evidence of abuse or neglect.

## **Confidentiality**

In operating this policy, workers must be aware that in order to protect children, young people and adults, in some circumstances it will be necessary to share what might normally be regarded as confidential information. An attempt should be made to gain consent to share information, from the person or a family member, but it will not be essential when there is a risk of harm. The following principles should be adhered to:

- information will be shared on a need to know basis
- information will be shared when it is in the best interests of the child, young person or adult
- confidentiality must not be confused with secrecy

## **What to do if abuse is reported or suspected**

According to The Care Act 2014 and the "Working Together to Safeguard Children" government guidance, local authorities have the lead role in co-ordinating work to safeguard children, young people and adults. However, the guidance recognises that successful responses also require multi-agency and multi-disciplinary working.

It is expected that all agencies will co-operate with one another and will work in partnership. It is important that any investigations are properly co-ordinated and that events are managed in the right order. KCIL workers are required to co-operate with any investigation carried out by RBK or any other agencies e.g. the Police, in cases that we have reported or where KCIL has been involved in providing services.

Furthermore, we will actively encourage our service users to report abuse themselves directly to RBK or Afc and/or join the RBK People@Risk Group which helps to raise awareness of abuse and how to report it.

## **How service users and/or carers raise safeguarding concerns**

Service users and carers can report safeguarding concerns to KCIL without fear of recrimination. KCIL will treat all disclosures in a confidential and sensitive manner.



Service users and carers can raise concerns in a number of different ways:

- Directly with a staff member
- Phone the office
- Complete a complaints or feedback form

### ***Procedure 1 – where a worker is concerned about abuse***

Workers at KCIL are encouraged to discuss any concerns with the Safeguarding Officer. If those concerns relate to the Safeguarding Officer, employees are expected to discuss the matter with the Chief Executive Officer. If an individual feels that the Safeguarding Officer or the Chief Executive Officer have not responded appropriately, or if the concerns relate to the Chief Executive Officer, then they should contact the designated Trustee at [roberta.cole@virginmedia.com](mailto:roberta.cole@virginmedia.com).

Every effort should be made to maintain confidentiality (see above section). Suspicions must not be discussed with anyone else in the organisation other than those nominated above. If the Safeguarding Officer or the Chief Executive is absent, then individuals should not delay and should contact designated Trustee.

The Safeguarding Officer, or in their absence the Chief Executive Officer, has the responsibility to act on behalf of KCIL in dealing with allegations or suspicion of abuse or neglect. This will include collating details of the allegation of suspicion using a Safeguarding Report Form (Appendix 1) and referring the matter to the Kingston Safeguarding Team. It is the task of the local Children's or Adult's Social Care services to investigate the matter.

Where a concern is discussed with the Safeguarding Officer, but they do not feel there is any cause for concern, if the referring worker of KCIL disagrees with this decision, those concerns must still be passed on to the Chief Executive Officer or the designated Trustee within the same day. Safeguarding is the individual responsibility of each person working with children, young people or adults. When any worker is concerned about a protection issue, the concern must be reported.

Under no circumstances should workers at KCIL carry out their own investigation into suspicions of abuse, neither should they question a child, young person or adult closely, nor any person named in any allegations, as to do so may distort any investigation that may be carried out subsequently or by the Police, Children's or Adult's Social Care services.

### ***Procedure 2 – where a child, young person or adult says something or acts in such a way that abuse is suspected or disclosed***

Children, young people and adults will occasionally disclose abuse to an individual they have come to feel they can trust. This happens for many reasons but the important thing to remember is that if they do tell a worker, they are doing so in the hope that the worker will act to stop it happening, even if they ask the worker not to do anything with the information.

The child, young person or adult may feel as if they are betraying someone they are close to and whom they love. It is not unusual for them to love their abuser but want the abuse to stop, especially when that person is a family member or carer. Equally, it may be someone they fear e.g. a person whom they perceive to be able to influence decisions concerning their future. Either way, it takes great courage for them to talk about abuse and the worker's response can be crucial.

It is important to remember too, that it can be more difficult for some people to tell than for others. For example, adults who have experienced prejudice and discrimination through racism may well believe that people from other ethnic groups or backgrounds don't really care about them. They may have little



reason to trust those they see as authority figures and may wonder whether we will be any different. Adults with a disability will have to overcome barriers before disclosing abuse. They may well rely on the abuser for their daily care and have no knowledge of how to react appropriately. Children and young people may feel guilty or embarrassed at disclosing, fear they may not be believed or that they will be removed from the family home.

The worker receiving the information should:

- respond in a calm but concerned way – do not allow shock or distaste to show
- tell the child, young person or adult that they are right to share what has happened and reassure them that they are not responsible for what happened and the abuse was not their fault
- accept what the child, young person or adult is saying – do not get them to justify what they are saying
- keep questions to a minimum, only to clarify what the child, young person or adult is saying, not to interrogate. This is particularly key with children, as care needs to be taken not to put words into the child's mouth, and the easiest way to do this is to ask questions
- not interrupt the child, young person or adult when they are recalling significant events
- not make assumptions or speculate nor make negative comments about the abuser
- reassure them that the problem can be dealt with
- repeat in summary what they have told you to ensure you have fully understood
- not promise the child, young person or adult that they will keep what is said as confidential or "secret"; reassure them that the information will only be passed to those people who need to know
- tell them who you need to inform, and where possible, gain their consent
- make a full accurate record using Safeguarding Report Form (Appendix 1) of what is said and done, though this should not result in a delay in reporting the problem.

The report should include a verbatim record of the disclosure. This may be used later in a criminal trial and it is vital that what the child, young person or adult discloses is recorded as accurately as possible. Therefore the record must be drafted in the individual's words and should not include assumptions or opinions of others. The individual's known details, including name, date of birth, address and contact numbers must be stated. It should also include the nature of the allegation including dates, times, specific factors and any other relevant information such as witness details.

Additionally there should be:

- a clear distinction between what is fact, opinion and hearsay
- clarity whether or not the person making the report is expressing their own concerns or those of someone else
- a description of any visible physical injury (clothing should not be removed to inspect) or details of indirect signs such as behavioural changes.

In the event of the need to protect a child or young person immediately, dial **999**. The Police are the only agency with statutory powers for the immediate protection of children.

It is recognised that workers may need support after receiving a disclosure and will be offered appropriate counselling.

### ***Procedure 3 - dealing with allegations or suspicion of abuse against a worker of KCIL***

This can be an extremely difficult issue to deal with. It can be difficult to accept that a colleague may deliberately harm a child, young person or adult. It may also be that the behaviour that causes concern



is bad practice rather than abuse. However, in these circumstances, the worker should still report their concerns to the Safeguarding Officer as outlined above in Procedure 1.

If it is clear, following consideration, consultation and investigation, that the concern is about poor practice rather than abuse, the Safeguarding Officer will take the necessary action to advise, manage and/or instigate disciplinary action against the worker about whom the allegation has been made.

Irrespective of the outcome of any external investigations, KCIL may consider suspension and/or disciplinary action in accordance with our Disciplinary Procedure.

***For children / young people:***

If the matter concerns a child or young person, the Safeguarding Officer, or in their absence the Chief Executive Officer, will contact the Single Point of Access (SPA) Team in Kingston on 020 8547 5008 or SPA in Richmond on 020 8891 7969. The manner in which the matter is handled will be determined with the advice and support of SPA and dependant on the level of the incident or issue. Where a worker has potentially behaved in a way that indicates they are unsuitable to work with children the Safeguarding Officer will discuss their concerns with SPA; possible outcomes could be training, professional support/counselling, or management in accordance with our Disciplinary Procedure. If the Safeguarding Officer considers the worker to have potentially committed a criminal offence against a child or young person, or a child or young person to be in immediate danger, they will contact the Police.

***For Adults:***

Where the matter concerns an adult, the Safeguarding Officer, or in their absence the Chief Executive Officer will contact the Adult Safeguarding Co-ordinator at Guildhall 1, High Street, Kingston Upon Thames, KT1 1EU. Telephone number: 020 8547 5005 or 020 8770 5000 after 5 pm. Email address: [adult.safeguarding@rbk.kingston.gov.uk](mailto:adult.safeguarding@rbk.kingston.gov.uk)

**Minimising Risk**

All workers at KCIL are encouraged to demonstrate exemplary behaviour when working with children, young people or adults in order to protect these groups from abuse and themselves from false allegations. Appendix 3 sets out good practice and common sense examples of how to create a positive culture and climate.

**Criminal Records**

Those who are involved in situations where they undertake regulated activity with children, young people or adults are exempt from the Rehabilitation of Offenders legislation. This means that prospective workers, volunteers and self-employed contractors must declare all criminal convictions and these will be taken into account when deciding on their suitability for working with vulnerable groups. No-one will be permitted to undertake a role which involves regulated activity with children, young people or adults without a satisfactory enhanced Disclosure and Barring Service (DBS) and relevant barred list check.

However, a criminal record may not prevent a person from working for KCIL in any other capacity: if that person is then asked to undertake regulated activity tasks with vulnerable groups any record must be declared to the Safeguarding Officer who will take appropriate advice where necessary and will decide whether this task should be allocated to another member of staff.

NB, The Safeguarding of Vulnerable Groups Act 2006 makes it a statutory requirement to refer anyone known to post a threat of harm to a vulnerable person to the DBS.

Further information can be found in our DBS procedures.



## **Central log**

A confidential Central Log of safeguarding information relating to service users is kept [location] and acts as a handover record between workers. All workers are required to refer to and read this and to add to this as appropriate. Full training on the use of this log will be given on induction.

## **Safety**

The safety of the people we work with is paramount and we are therefore committed to providing a safe environment within which to work. Those working with children, young people or adults should ensure all appropriate risk assessments and security checks have been carried out prior to any assignment. This could include first aid cover and accident reporting.

## **Training**

All KCIL workers will undergo safeguarding training as part of their induction and then every three years. Trustees and general volunteers are also encouraged to take up safeguarding training opportunities.

Training can be completed via the RBK E-learning system "EVOLVE", in-house, or by attending an external training course authorised by the manager.

## **Gifts and Inducements**

On no account should anyone from KCIL give a service user or their parent/carer a gift or buy refreshments etc. which could be in any way considered as a bribe or inducement, to enter into a relationship with a worker, or give rise to any false allegations of improper conduct against the individual.

## **Data Protection**

All personal information regarding service users is highly confidential and should only be shared with appropriate people on a need to know basis. Any information relating to children, young people or adult protection issues will be stored in a folder under lock and key in the CEO's office or on the CEO's work PC which is password protected, and there will be limited access to this information by the Safeguarding Officer. The requirement for confidentiality is emphasised.

Information relating to any disclosures will be passed to the local Children's or Adult's Social Care services, Police Authority or other relevant agency only. The Safeguarding Officer will retain concerns relating to protection, which have not been referred to an external body, in a secure location for a period of 6 years.

## **Whistleblowing**

In accordance with the Public Interest Disclosure Act 1988, KCIL will support and protect those workers who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions. Workers of KCIL are expected to follow the procedures laid out in this policy.

Allegations that are found to have no grounds or substance have been raised with malicious intent will be managed in accordance with the Disciplinary Procedure.

## **Communicating this policy and concerns**



All employees, workers and volunteers at KCIL will be made aware of this policy and a copy will be available on the Shared Drive which all staff have access to. Furthermore, a copy of this policy will be given to all relevant bodies with whom we work and will be made available to parents/carers of service users.

Any concerns about the assignment or people involved should be addressed with the Chief Executive Officer.

### **Breach of this policy**

Failure to follow the guidelines in this policy is considered a serious offence and will be investigated thoroughly and dealt with through our Disciplinary Procedure. Serious breaches may lead to dismissal.

### **Implementation, monitoring and review of this policy**

This policy will take effect from [date]. The Chief Executive Officer has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation (at least annually) and additionally whenever there are relevant changes in legislation or to our working practices.

Any queries or comments about this policy should be addressed to the Safeguarding Officer or the Chief Executive.



## APPENDIX 1 – SAFEGUARDING REPORT FORM

### Child, Young Person or Adult's details

Name			
Address			
Contact Telephone Number(s)	Home	Mobile	Other
Date of birth		Gender	
Ethnicity			
Details of any disability			
School name & address <i>(where applicable)</i>			
Person with parental or caring responsibility			

### Details of person reporting suspected or reported abuse

Name			
Job Title and Location			
Contact Telephone Number(s)	Work	Mobile	Other
Email address			

Are you reporting your concerns or passing on those of somebody else? *(please give details)*

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**Brief details of the allegation**

*Remember to include any dates, times and specific factors. Be specific as to whether you are providing fact, opinion/observation or hearsay. Specify any relationships between the individual and any other person involved.*

**Description of any injury or indirect signs**

*Please describe any physical injury you have seen, or a description of any indirect signs such as behavioural changes*

**Child, Young Person or Adult's account**

*Please detail the individual's account of what happened. How did they describe the situation, what was their explanation for any injury?*





**Witness details and account**

Please provide the name, address and contact numbers for any witnesses to the allegation, and specify the relationship to the child, young person or adult.

Name			
Address			
Contact Telephone Number(s)	Home	Mobile	Other
Relationship			

Please give details of their account of what happened

**Reporting Incidents**

Any suspected or reported abuse must be reported immediately to:

[Job title] – Safeguarding Officer	[Details]
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Or in their absence:

Chief Executive	[Details]
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If the concern arises out of normal office hours and it is clear that abuse has occurred, contact should be made with the local Safeguarding Teams

<b>Adult’s Safeguarding Team</b>	[Details]
<b>Children’s Safeguarding Team</b>	[Details]
<b>Afc</b>	[Details]

In the event of the need to protect a child or young person immediately, dial **999**.





## **APPENDIX 2 – SIGNS THAT MAY INDICATE THAT ABUSE HAS TAKEN OR IS TAKING PLACE**

### **Physical Abuse**

Generally, evidence that physical abuse has or is taking place might include:

- serious, sustained or regular unexplained bruising;
- burns, especially in areas where it would be difficult for them to have been accidental;
- injuries that look as though they may have been caused by a recognisable object;
- unexplained fractures or cuts;
- unwillingness by service user to agree to physical examination by professionals.

Specifically, children or young people may:

- seem frightened of the parents and protest or cry when it is time to go home;
- shrink at the approach of adults;
- report injury by a parent or another adult/carer.

You should also consider the possibility of physical abuse when the parent or adult/carer of a child or young person:

- offers conflicting, unconvincing, or no explanation for the child's injury;
- describes the child as "evil," or in some other very negative way;
- uses harsh physical discipline with the child;
- has a history of abuse as a child.

### **Sexual Abuse**

Generally, evidence that sexual abuse has or is taking place might include:

- pain, itching or injury in the anal, genital or abdominal areas;
- difficulty maintaining usual physical posture whilst walking or sitting (due to the above injuries);
- bruising to or bleeding of external genitalia;
- torn, stained or bloody underclothing;
- recurrent bouts of cystitis or the occurrence of venereal disease;
- unexplained problems associated with the removal of or damage to catheters or equipment used for the service user's physical support needs;
- uncharacteristic change in the person's sexual behaviour or attitude towards sex;
- pregnancy, especially where the identity of the father is vague.

Specifically, children or young people may:

- report nightmares or bedwetting;
- experience a sudden change in appetite;
- demonstrate bizarre, sophisticated, or unusual sexual knowledge or behaviour;
- become pregnant or contract a venereal disease;
- run away;
- report sexual abuse by a parent or another adult/carer.



You should consider the possibility of sexual abuse when the parent or other adult/carer:

- is unduly protective of the child or severely limits the child's contact with other children, especially of the opposite sex;
- is secretive and isolated;
- is jealous or controlling with family members.

## **Neglect**

Generally, evidence of neglect might include:

- weight loss;
- poor standard of hygiene, physical appearance and unsanitary living conditions;
- lack of needed medical or dental care;
- lack of sufficient clothing for the weather conditions;
- insufficient or physically or culturally inappropriate food or drink; food that has not been properly cooked, stored or reheated;
- a service user being ignored, discriminated against or punished by staff or other service users for whatever reason;
- evidence of physical and emotional abuse that is not acted upon.

Specifically children or young people may

- beg or steal food or money;
- abuse alcohol or other drugs;
- state that there is no one at home to provide care.

Consider the possibility of neglect when the parent or other adult/carer:

- appears to be indifferent to the child;
- seems apathetic or depressed;
- behaves irrationally or in a bizarre manner;
- is abusing alcohol or other drugs.

## **Emotional Abuse**

Generally, evidence that emotional abuse has or is taking place might include:

- uncharacteristic and possibly dramatic changes in mood or behaviour;
- depression, withdrawal, anxiety, aggression, agitation;
- service user demonstrates excessive effort to please or appease;
- service user demonstrates reluctance to be supported by certain member of staff or apprehension at being visited by a certain friend, relative or other person;
- service user disengages from day to day routine and withdraws.

Specifically a child or young person may:

- be either inappropriately adult (e.g. parenting other children) or inappropriately infantile (e.g. frequently rocking or head-banging);
- be delayed in physical or emotional development;
- have attempted suicide;
- reported a lack of attachment to the parent.

You should consider the possibility of emotional maltreatment when the parent or other adult/carer:



- constantly blames, belittles, or berates the child or young person;
- is unconcerned about the child or young person and refuses to consider offers of help for problems;
- overtly rejects the child or young person .

## **Bullying**

Generally, evidence that bullying has or is taking place might include:

- Service user demonstrates signs of isolation and may be reluctant to take part in activities;
- Service user demonstrates a lack of social interaction and may become withdrawn;
- Service user demonstrates aggression;
- Service user may appear very anxious.

## **Financial or material abuse**

Evidence that financial or material abuse has or is taking place might include:

- Service user may have a steady depletion of savings;
- Service user may constantly fail to pay bills;
- Service user may regularly have a lack of money for social outings;
- Service user may regularly have items go missing;
- Service user may be showing signs of neglect due to not having any money.

## **Institutional abuse**

Evidence that institutional abuse has or is taking place in a care setting might include:

- Service users are denied rights to access, use or consume items provided to them by visitors, relatives and friends;
- Service users are denied the right to wear their own clothes, for whatever reason, or if they are forced to share another person's clothes, spectacles etc.;
- Service users are subject to routines or practices that discourages independence;
- Visitors are discouraged from visiting or are not given proper answers to questions;
- Service users are not consulted appropriately about matters that affect them;
- Support planning does not take place properly or at all, or support plans are produced but not used or reviewed;
- There is no provision for meaningful activities.



### **APPENDIX 3 - HOW TO MINIMISE RISK**

All workers at KCIL are encouraged to demonstrate exemplary behaviour when working with children, young people and adults in order to protect these groups from abuse and themselves from false allegations. The following are good practice and common sense examples of how to create a positive culture and climate.

- Maintain a register of those working with you at any given time
- Work in an open environment avoiding private or unobserved situations and encouraging open communication. Avoid spending excessive amounts of time alone with individuals away from others
- Treat everyone equally, with respect and dignity; avoid “favouritism” and singling out “troublemakers”
- Always put the welfare of the individual first
- Maintain a safe and appropriate distance with children, young people or adults. It is not appropriate for workers to flirt with, to date or to have an intimate relationship with a service user under any circumstances
- Ensure that if any form of physical/manual touching is required, it should be provided openly
- Be an excellent role model
- Where required give enthusiastic and constructive feedback rather than negative criticism
- Keep a written record of any injury that occurs, along with the details of any treatment given
- Attend relevant training courses that KCIL provides.

**The following should never be sanctioned. You should never:**

- engage in rough, physical or sexually provocative games
- share a room overnight
- allow or engage in any form of inappropriate touching
- allow or engage in any inappropriate language or bullying to go unchallenged
- make sexually suggestive or discriminatory comments, even in fun
- deliberately reduce a person to tears as a form of control
- allow allegations made to go unchallenged, unrecorded or not acted upon
- trivialise abuse



- invite or allow a child, young person or adult to your home, take them out unsupervised or give them a lift in your car without the knowledge and consent of the parents/carers and your managers
- Do things of a personal nature that they can do for themselves (it may sometimes be necessary for employees or volunteers to do things of a personal nature, e.g. toileting, if the child, young person or adult has disabilities). These tasks should only be carried out in the full understanding and consent of parents/carers and your manager. There is a need to be responsive to an individual's reactions, talk with him/her about what you are doing and give choices where possible. Avoid taking on tasks for which you are not appropriately trained
- Enter a room where a person may be changing their clothes or not be fully dressed, without first clearly getting their consent to enter.

### **Incidents that must be reported/recorded**

If any of the following occur, you should report this immediately to the **[Safeguarding Officer]** who will discuss the matter with you and advise whether a Safeguarding Report Form (Appendix 1) should be completed:

- if you or another worker accidentally hurts someone
- if a service user seems distressed in any manner
- if a service user appears to be sexually aroused by your actions
- if you are concerned that a relationship is developing that could represent an abuse of trust
- if you are concerned that a service user is becoming attracted to you
- if you are concerned that a colleague is becoming attracted to someone in his/her care
- if a service user misunderstands or misinterprets something you have done
- if you have had to use reasonable physical restraint to prevent a service user harming themselves or another or from causing significant damage to property
- if a person reports an allegation regarding a member of an external organisation.