

D2: SAFEGUARDING POLICY

INTRODUCTION

1. Cognus (subsequently referred to as “the Company”) supports and works with a wide range of children, young people and adults and we recognise that some people we are in contact with are vulnerable.
2. All staff members, volunteers and directors of the Company play an important part in promoting the welfare and protection of the vulnerable people with whom the Company works. We recognise that directors have primary responsibility for safeguarding.
3. The aim of this policy is to ensure that the Company acts appropriately when it becomes aware that a vulnerable person may be at risk. It also provides a framework which ensures that those involved in work with vulnerable people have the appropriate information and support to enable them to take the necessary steps to stop the abuse happening.

SCOPE OF THE POLICY

4. The policy is to be used by all members of staff or volunteer working directly with children and young people or a vulnerable adult, and to any other support staff, director of the organisation who becomes involved in a child protection or vulnerable adult concern in the course of their work for the Company.
5. The policy applies to anyone with whom we are in contact in the course of our work, who is a child, a young person, or vulnerable adult.
6. Where the policy or procedure refers to a ‘child’ or ‘young person’ we mean anyone who has not yet reached the age of 18 years.
7. Where the policy refers to ‘vulnerable adult, we mean anyone who is 18 years and up to 25 years and who:
 - a) has needs for care and support
 - b) is experiencing, or is at risk of, abuse or neglect, and
 - c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

PURPOSE OF THIS POLICY

8. This policy sets out how the Company implements safeguarding for children, young people, and vulnerable adults who are or potentially at risk with whom they come into contact in the course of their work.
9. The Company is committed to devising and implementing policies so that everyone within the organisation accepts their responsibilities for safeguarding children, young people and vulnerable adults at risk from abuse and neglect. This means following procedures to protect them and reporting any concerns about their welfare to the appropriate authorities.
10. This policy and procedure helps us to achieve this by:
 - a) Supporting us to safeguard children, young people and vulnerable adults in practice, by defining abuse and informing us what to do;
 - b) Ensuring we all work to the same policy and procedure;
 - c) Making sure we are accountable for what we do;
 - d) Being clear what roles and responsibilities we all have in safeguarding;
 - e) Saying what staff can expect from the organisation to help them work effectively.

PRINCIPLES

11. In support of these objectives, we are committed to the following principles.
12. To achieve a safe ethos, we will:
 - a) promote the safety of children, young people and vulnerable adults in all our work, both directly and indirectly through our partnership work;
 - b) have in place quality assurance processes that help us to ensure we are all safeguarding in practice
 - c) treat all children, young people and vulnerable adults fairly in being able to access services which meet their needs, regardless of gender, ethnicity, disability, sexuality or beliefs
13. To achieve a safe environment, we will:
 - a) ensure the welfare and safety of children, young people and vulnerable adults is paramount in all our activities
 - b) listen to service users and take account of what they tell us in making decisions about them

- c) take all reasonable steps to protect service users from harm, discrimination, and degrading treatment
- d) practice with respect for children's rights, wishes and feelings
- e) regularly assess and review safety risks which arise from premises, activities, equipment and travel arrangements, as outlined in the Company's Health and Safety Policy

14. To achieve safe processes, we will:

- a) take all suspicions and allegations of abuse, from inside or outside the organisation, seriously, and respond to them promptly and appropriately
- b) be clear about everyone's roles and responsibilities
- c) implement safeguarding procedures that are compliant with the expectations of the relevant local authority safeguarding arrangements
- d) have in place clear arrangements for how we would respond to concerns about how we implement safeguarding in practice within the Company.

15. To achieve safe information, we will:

- a) be clear with service users how the things they tell us will be used
- b) communicate promptly and clearly within the Company and with external agencies, and follow the requirements of local information sharing protocols
- c) keep good records of our work with service users and also of our management of staff's work
- d) hold service users' information with care, and use it for agreed purposes only

16. To achieve safe staff, we will:

- a) recruit staff and volunteers with regard to their suitability for work with children or adults at risk, including use of enhanced Disclosure and Barring Service checks
- b) provide directors, staff and volunteers with guidance and training in their safeguarding role, and ensure they have access to our policies and procedures
- c) make sure everyone has access to advice on safeguarding at all times in the course of their work
- d) be clear with everyone what their individual role and responsibility is in safeguarding
- e) support staff and volunteers to carry out their job with appropriate supervision

WHAT IS CHILD ABUSE OR NEGLECT?

17. Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Abuse means a child's rights and needs are not being met as defined in The Children's Act 2004 and the United Nations Convention on the Rights of the Child (1989). Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. Abuse may occur through the actions of an adult or adults, or another child or children.
18. Where a child is disabled, injuries or behavioural symptoms may mistakenly be attributed to his/her disability rather than the abuse. Similarly, where a child is black or from a minority ethnic group, aggressive behaviour, emotional and behavioural problems and educational difficulties may be wrongly attributed to racial stereotypes, rather than abuse. Cultural and religious beliefs should not be used to justify hurting a child. Safeguards for all children and young people are the same regardless of disability or ethnicity.
19. Physical Abuse - Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces or causes ill health to a child whom they are looking after. This situation is called Induced Fabrication Illness by a Carer (formerly known as Munchausen's by proxy).
20. Emotional Abuse - Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Witnessing the harm of another person, such as in the case of domestic violence, is a form of emotional abuse. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone.
21. Sexual Abuse & Sexual Exploitation - Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including sexual exploitation, whether or not the child is aware of what is happening, and whether it is for money or reward or not. The activities may involve physical contact, including penetrative contact (e.g. rape and buggery) or non-penetrative acts. They may include non-contact activities, such as involving children in seeing or receiving or sending sexually suggestive emails or text-messages, or inappropriate behaviour in

Internet chat rooms, involving children looking at, or in the production of, pornographic material of watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

22. Neglect - Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur as a result of maternal substance abuse during pregnancy. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, failure to ensure adequate supervision including the use of inadequate care-givers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
23. Disabled children are at increased risk of abuse and those with multiple disabilities are at even more significant risk both of abuse and neglect. Parents of disabled children may experience multiple stresses. This group of children may be particularly vulnerable to abuse for a number of reasons including:
 - a) Having fewer social contacts than other children;
 - b) Receiving intimate personal care from a larger number of carers;
 - c) Having an impaired capacity to understand what they are experiencing is abuse or to challenge the abuser;
 - d) Having communication difficulties resulting in difficulties in telling people what is happening;
 - e) Being reluctant to complain for fear of losing services;
 - f) Being particularly vulnerable to bullying or intimidation;
 - g) Being more vulnerable to abuse by peers than other children.
24. Disability is defined as: a major physical impairment, severe illness and/or a moderate to severe learning difficulty; an ongoing high level of dependency on others for personal care and the meeting of other basic needs.
25. Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the four main types are physical (eg hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling), and emotional (eg isolating an individual from the activities and social acceptance of their peer group). There is increasing use of new technologies as a tool for bullying, cyber and all incidents should be taken seriously.

26. Children and young people who harm or attempt to harm themselves must be taken seriously. The self-harming behaviour in itself may cause impairment of the child's health or development and in some circumstances present significant harm or the risk of significant harm.
27. Self-harming behaviour may also arise alongside eating disorders and/or drug misuse.
28. Female genital mutilation (FGM) is a collective term for procedures that include the removal of part or all of the external female genitalia for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious physical and mental health consequences both at the time and in later life. The procedure is typically performed on girls of 4-13 years but may be performed on new born babies or on young women. FGM can result in death.
29. FGM is a criminal offence (Prohibition of Female Circumcision Act 2003). Under the act it is an offence to arrange, procure, aid or abet female genital mutilation. Parents/carers may be liable under this act. It is also an offence to allow the procedure to be undertaken in another country. Where individuals become aware that a procedure has taken place they must report it to the police. Where individuals become aware that a girl is at risk of FGM a referral should be made to the appropriate authority (MASH).
30. A forced marriage is one that is conducted without the full consent of both parties and where duress is a factor. Forced marriage can amount to sexual and emotional abuse and put children or adults at risk of physical abuse. In circumstances where there are concerns that someone is at imminent risk of a forced marriage urgent referrals should be made to the appropriate authority.
31. In the case of a young person at risk of forced marriage it is likely that an initial discussion with the parent, carer or other community member may significantly increase the level of risk to the young person.
32. Sexual exploitation also includes non-contact activities, such as involving children in seeing or receiving or sending sexually suggestive emails or text-messages, or inappropriate behaviour in Internet chat rooms, involving children looking at, or in the production of, pornographic material of watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
33. Children can be trafficked into, within and out of UK for many reasons and all different types of exploitation. Trafficking is a form of child abuse and needs an appropriate safeguarding response. Any child who is recruited, transported, transferred, harboured or received for

exploitative reasons is considered to be a victim of trafficking, whether or not they have been forced or deceived. This is because it is not considered possible for children in this situation to give informed consent. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adult. It is important these children are protected too.

34. Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud, forced marriage, begging and involvement in criminal activity such as pick pocketing, theft and working on cannabis farms. They are likely to be subjected to other forms of abuse, as a means of coercing and controlling them. Trafficking is carried out by individual adults and organised crime groups.

Radicalisation and the PREVENT duty

35. The Counter-Terrorism and Security Act 2015 contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent duty.

36. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff and volunteers should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

37. Signs or indicators that someone is being drawn into terrorist activity may include:

- a) Graffiti symbols, writing or artwork promoting extremist messages or images;
- b) accessing terrorist related material online, including through social network sites;
- c) reports of changes in behaviour, friendships or actions;
- d) voicing opinions drawn from terrorist related ideologies and narratives;
- e) Use of extremist or hate terms to exclude others or incite violence.

WHAT IS ABUSE OF A VULNERABLE ADULT?

38. Abuse is a violation of a person's rights or dignity by someone else. It can be done by anyone including relatives and family members, professional staff, paid care workers, volunteers, other users of services, neighbours, friends and associates or strangers. There are many kinds of abuse including:

- a) Psychological – includes emotional abuse / threats of harm or abandonment / deprivation of contact / humiliation / controlling behaviour / exploiting, corrupting/ cyber bullying / exposure to the ill treatment of someone else.
- b) Discriminatory – includes forms of harassment/slurs similar treatment because of race/gender/gender identity/age/disability/sexual orientation or religion.
- c) Physical – includes assault/ hitting/ slapping/ pushing/ restraint/ inappropriate punishment/ shaking/ burning etc. Misuse of medication and/ or physical harm caused when a parent/carer fabricates the symptoms of or deliberately induces illness in a child.
- d) Financial/material – includes theft/fraud/internet scams/coercion/misuse or misappropriation of property or possessions etc.
- e) Neglect/acts of omission – persistent ignoring of medical, emotional or physical care needs / failure to provide access to appropriate healthcare / withholding the necessities of life / unsupervised in inappropriate situations.
- f) Sexual – Includes rape / indecent exposure / sexual harassment / exposure to pornography against the person's will / other sexual acts without consent etc.
- g) Organisational – covers neglect and poor practice within an institution or specific care setting or in someone's own home. Can be through neglect or poor professional practice resulting from policies/culture/systems.
- h) Self-neglect – covers a wide range of behaviour eg. Neglecting to care for one's own health/hygiene/surroundings/hoarding etc.
- i) Modern slavery - covers human trafficking / forced labour / domestic servitude / forcing individuals into a life of abuse or inhumane treatment
- j) Domestic violence and abuse – the definition of domestic abuse is “Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial, or emotional, controlling and coercive) between those aged 16 and over who are or have been intimate partners or family members, regardless of gender and sexuality. This includes issues of concern to black and minority ethnic (BME) communities such as so-called ‘honour killings’.”

39. This list may not be exhaustive but provides examples. Abuse may be carried out deliberately or unknowingly and it may be a single or repeated act. People at risk may be abused in more than one way.

REPORTING ABUSE

40. The first priority should always be to ensure the safety and protection of the vulnerable person. To this end it is the responsibility of all staff and volunteers to act on any suspicions of abuse or

neglect and to pass on their concerns to a Designated Safeguarding Lead, (DSL) within the Company or appropriate agency.

41. It is not the responsibility of anyone working, either paid or unpaid, within the Company, to decide whether or not abuse has taken place or to carry out an investigation as this is the role of the local authority and/or police. These agencies hold the lead responsibility for establishing and co-ordinating the local intra-agency framework for safeguarding vulnerable adults and children.
42. All staff and volunteers are required to act in accordance with this policy on any concerns raised and ensure that a decision is made on the appropriate action to be taken in each case.
43. If a vulnerable adult with whom the Company is in contact makes a disclosure of abuse or neglect, care should be taken to explain to them that a report will be made to the designated person and/or appropriate agency.
44. If it is considered by a member of staff or volunteer that a vulnerable adult or child is in immediate danger, then the police should be contacted without delay and a report made to the Designated Safeguarding Lead or their deputy as soon as practicable.
45. Any suspected abuse or neglect must be reported as soon as is practically possible to the Designated Safeguarding Lead so a decision can be made as to who will report the concerns to the appropriate agency.
46. The Designated Safeguarding Lead for Cognus is the Service Director. In their absence, the deputy Designated Safeguarding Lead is the Managing Director.
47. The Designated Safeguarding Lead for concerns about directors is the Chair of the Board.
48. If a member of staff or volunteer is suspected of abuse this must be brought to the immediate attention of the Designated Safeguarding Lead who will alert the appropriate agency. The Designated Safeguarding Lead will suspend or remove from active service the employee or volunteer pending the outcome of an investigation.
49. Personal information may be disclosed without the individual's consent if there are reasonable grounds to believe that an individual is at risk of harm.

GOOD PRACTICE AND SUPPORTING DOCUMENTS:

50. The Company's approach to Safeguarding and Child Protection will be outlined in the Annual Report.
51. The Company will ensure that any partners or external agencies it works with to provide activities has a Safeguarding/Child Protection Policy in line with the statutory duties.
52. Incidents will be reported to the board regularly or by exception where necessary. The Chair of the Board will be kept informed regularly, as appropriate.
53. Further guidance:
 - a. Strategy for dealing with safeguarding vulnerable groups including children issues in charities (Charity Commission, 2013): <https://www.gov.uk/government/publications/strategy-for-dealing-with-safeguarding-issues-in-charities>
 - b. Charities: how to protect vulnerable groups including charities (Gov.uk 2013): <https://www.gov.uk/guidance/charities-how-to-protect-vulnerable-groups-including-children>
 - c. Working together to safeguard children 2017: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
 - d. Safeguarding children and young people (Charity Commission 2014): <https://www.gov.uk/government/publications/safeguarding-children-and-young-people>
 - e. Prevent Duty (HM Government 2015) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf
 - f. Sutton Local Safeguarding Children Board: <http://www.suttonlscb.org.uk/>
 - g. Keeping Children Safe in Educatio (HM Government 2016): <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>