

Safeguarding Policy

Version Control:

| Version | Author | Changes | Review | Approval |
|---------|-------------------------|---|------------|------------|
| 3.6 | Safeguarding Group (SG) | Version control table added to the beginning of the document. | 20/01/2022 | 20/01/2022 |
| 3.7 | Safeguarding Group (SG) | 11. Recording a Third-Party Disclosure Amended to 11. Recording Third Party Safeguarding Information 11.1 Include definition 11.2 Amendment: to recording process. Insert: Third Party Process Flow Appendix 3. Update Flow Chart to reflect Process | 16/03/2022 | 17/03/2022 |
| 3.8 | Safeguarding Group (SG) | 5.1 -In-house at the start of someone's employment or volunteering role. This is irrespective of their role within the Company because safeguarding issues can occur at any time. -Multi-agency (minimum level 2) for all employees and volunteers who are working directly with individuals/families. This is to ensure they have an understanding of partners' roles and have confidence in making referrals. Managers will be expected to undertake multi-agency training at level 3 as a minimum. -Updated on a regular cycle of three years AND at all times on new guidance or learning (for example learning from Serious Case Reviews). Amended To: -In-house at the start of someone's employment or volunteering role. This is irrespective of their role within the Company because safeguarding issues can occur at any time and is part of the essential training programme. This training is updated on a regular cycle of three years AND at all times on new guidance or learning (for example learning from Serious Case Reviews). -In addition all employees and volunteers who are working directly with individuals/families will undertake Multi-agency training (minimum level 2). This is to ensure they have an understanding of partners' roles and have confidence in making referrals. Managers will be expected to undertake multi-agency training at level 3 as a minimum. | 17/05/2022 | 17/05/2022 |
| 3.9 | F Reed | 10 – Recording a Safeguarding Incident – Amend to Recording a Safeguarding Disclosure 10.1 – The safeguarding incident – Amend to The safeguarding disclosure 11. 1 Definition: These are concerns that have already been reported/ investigated or are currently being investigated. Amended to: Definition: very occasionally we may receive information from another agency relating to a young person that imposes restrictions on how we work with them including potential safeguarding risks to others. If an adviser receives this type of information, it is vital that they do not keep it to themselves because they do not know who else may have cause to work with the individual. Any information in this category should be recorded under Safeguarding and discussed with a manager | 18/07/2022 | 18/07/2022 |

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|------|-------------------------|--|------------|------------|
| | | <p>11.2 Insert</p> <ul style="list-style-type: none"> Identify any potential safeguarding risk for others <p>NB If a third party provides safeguarding information that has not been reported Amend to: If the safeguarding information has not been reported Remove: Receiving Safeguarding Information from a Third-Party Flow Chart. Insert: See Appendix 3: Receiving Safeguarding Information Flow Chart</p> <p>Insert: Appendix 3 Receiving Safeguarding Information Flow Chart</p> | | |
| 3.10 | Safeguarding Group (SG) | <p>Amend 3.3 Local policies and procedures are followed.. To: Local policies are understood and followed...</p> <p>Amend: 6.2 - 6.5 to 16.1-16.4 If an employee or volunteer believes an individual is at risk, they MUST act.</p> <p>6.3 If there is clear evidence of imminent danger or significant harm is likely, action must be taken immediately. If there is any doubt the employee/volunteer will refer to their line manager for advice.</p> <p>6.4 If the line manager is not available the situation will immediately be referred to the second line manager or, in their absence, another CSW Group manager</p> <p>6.5 The employee/volunteer will use the flowchart (appendix 2) to guide their actions.</p> <p>Amend 7. Sharing Information To 7. Collecting and Sharing information</p> <p>Add 7.4 Cyber Safeguarding. Employees and volunteers should be aware that the young people we help can be just as vulnerable online in the cyber world as they are in the real world. Cyber bullying is an increasing phenomenon and can happen anywhere and at any time to a young person. There is to be no differentiation between our online and offline safeguarding approach.</p> <p>Amend 6.6 to 7.1 When a safeguarding situation arises the employee/volunteer will:</p> <p>Delete 8. Referral to relevant other agencies</p> <p>Amend 9. Referral to relevant other agencies To 8. Working with other agencies</p> <p>Amend numbering: 10 - 9. Recording a Safeguarding Disclosure 11. – 10. Recording Safeguarding Information 12 - 11. Change of Employee or Volunteer 13. Supervision to 12. Employee Support 14 - 13. Reporting 15 - 14. Auditing</p> <p>Remove 14.1 ...In addition, twice a year a sample of safeguarding reports will be reviewed to ensure they are meeting the required standard. Learning from these audits will be shared with all team. Insert: 16. Keeping Individual Safe.</p> | 18/12/2023 | 19/12/2023 |

1. Safeguarding Policy Statement

1.1 CSW Group purpose is to inspire, develop and support people, communities and organisations to make positive change through sustainable high-quality services. In achieving this we aim to safeguard and promote the welfare of children, young people and vulnerable adults. All employees and volunteers are required to share this commitment.

1.2 The purpose of this policy statement is:

- to protect children, young people and vulnerable adults who receive our services.
- to provide clarity to service users, employees and volunteers on the principles that guides our approach to safeguarding.

Note: throughout this policy we use the term individual/individuals to refer to children, young people, or vulnerable adults. Adults who are not deemed to be vulnerable should be signposted to the Police or their GP. They are not in the scope of this policy. If you are in doubt, please consult your line manager.

2. The Principles Underpinning Our Work

- All individuals are safeguarded, and their welfare promoted.
- We work with partners to improve outcomes for the individuals we work with.
- We hold each other and our partners to account for the work undertaken on behalf of an individual.
- If in doubt we act.
- We collect appropriate information to enable decisions to be made by ourselves/others.
- We have a learning culture and continually improve our services to the most vulnerable in our society.

3. The Framework Underpinning Our Work

3.1 This policy is based on current legislation and both local and national policy and guidance.

3.2 Our employees and volunteers work across a number of local authority areas and therefore will also have due regard to local policies and practice in the area in which they undertake their work.

3.3 Employees and volunteers can find relevant local policies and procedures at the websites listed in Appendix 1. It is important the correct local policies and procedures are understood and followed in all safeguarding incidents.

3.4 National policy and guidance can be found at the following links:

NSPCC website: <https://learning.nspcc.org.uk/child-protection-system/england/#heading-top>

Working Together 2018: <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

4. Recruiting Employees and Volunteers

- 4.1** All adverts for employee/volunteering vacancies will contain a statement on our commitment to safeguarding individuals and the expectation that anyone working with us will share that commitment.
- 4.2** All necessary background checks, such as references and DBS certificates, should be in place before an individual is able to work with our service users or have access to their personal information.
- 4.3** All recruitment panels for those vacancies that involve directly working with individuals and families will have at least one member who has undertaken Safer Recruitment training.
- 4.4** All employees and volunteers will commit to our mission and values.

5. Training Our Employees and Volunteers

- 5.1** To ensure individuals receive the best possible service our employees and volunteers will complete essential training at the start of their time with CSW Group. This will be updated with learning throughout their career with us to ensure they have the confidence, skills, knowledge and behaviours needed to safeguard those they work with. Training will be:
 - In-house at the start of someone's employment or volunteering role. This is irrespective of their role within the Company because safeguarding issues can occur at any time and is part of the essential training programme. This training is updated on a regular cycle of three years AND at any stage following new guidance or learning (for example learning from Serious Case Reviews).
 - In addition, all employees and volunteers who are working directly with individuals/families will undertake Multi-agency training (minimum level 2). This is to ensure they understand partners' roles and have confidence in making referrals. Managers will be expected to undertake multi-agency training at level 3 as a minimum.
 - Twice a year relevant teams will review anonymised safeguarding case studies to help us develop a consistent approach to this work.
- 5.2** Employees and volunteers are responsible for ensuring their safeguarding training is up to date. If they have been asked to complete update training and this has not been done the situation will be handled through the Company Disciplinary Process

6. Keeping Individuals Safe

- 6.1** We will demonstrate a focus on individuals by:
 - Being open and honest.
 - Demonstrating that we are listening and not judging.
 - By showing unconditional regard for them.

7. Collecting and Sharing Information

- 7.1** Should a safeguarding situation arise the employee/volunteer will:
 - Listen carefully and demonstrate they are taking the information seriously.
 - Not stop the individual from freely recalling significant events.
 - Not probe for, or attempt to seek to interpret, information.
 - Avoid leading questions.

- o Offer the opportunity to the individual to speak to someone else (for example they may wish to speak to someone of the same sex).

7.2 Employees and volunteers will follow the Seven Golden Rules for sharing sensitive information. These are:

1. Data Protection legislation is not a barrier to sharing information.
2. Be open and honest with the person whose information you will be sharing, unless doing so would make the situation unsafe for them or someone else.
3. Seek advice – if in doubt about whether to share it is possible to discuss the situation with someone else without disclosing the identity.
4. Share with consent if possible.
5. Consider the safety and wellbeing of the individual.
6. Share what is necessary, proportionate, relevant, and accurate. Do so timely and securely.
7. Keep a record of your decision and the reason for it.

7.3 When carrying out tracking requirements as part of our contracts we will sometimes need to record a status of 'Not Known' against an individual. When this happens within the Transitions contract, we will inform our Commissioners of anyone 'Not Known' for whom we do not have any up-to-date contact details. This is to ensure it can be considered alongside information that might have been obtained from other sources which might raise a safeguarding concern. In addition, we will apply the same process to anyone who has been 'Not Known' for over 3 months where we have exhausted all methods of attempted contact.

7.4 Cyber Safeguarding. Employees and volunteers should be aware that the young people we help can be just as vulnerable online in the cyber world as they are in the real world. Cyber bullying is an increasing phenomenon and can happen anywhere and at any time to a young person. There is to be no differentiation between our online and offline safeguarding approach.

8. Working with Other Agencies

- 8.1** By working together, internally and externally, we can ensure that individuals receive the best level of support. No one person will have the full picture on their needs and therefore working with others is essential.
- 8.2** Employees and volunteers are expected to share all incidents/concerns with their line manager. All those who review an incident have a responsibility to provide appropriate support/challenge to the employee/volunteer.
- 8.3** If an employee/volunteer is not happy with the outcome of any stage in the safeguarding situation they must challenge others appropriately. This is not about attaching blame or responsibility to another but ensuring we are all doing the best we can for the individual.

9. Recording a Safeguarding Disclosure

- 9.1** The safeguarding disclosure will be recorded securely in the relevant database and marked as sensitive where appropriate. The information recorded will be detailed, including details of those the individual has been referred to, planned follow-up and outcomes. This is important to help a third party understand the incident and the rationale for actions taken.

9.2 In addition, a Safeguarding Disclosure Report will be completed ([Safeguarding Form](#)). This will include:

- All those involved/mentioned in the incident.
- A chronology of the events (list events in a series of brief bullets).
- Statements made by individuals in quotation marks.
- Dates of referrals made and to whom.
- Feedback on referrals.
- Updates on the incident (continue to add to the document until the case is closed).

9.3 These must be factual and completely accurate and checked for readability. They may be used in any future investigation and someone new to the incident must be able to understand the situation fully, the actions you took and the rationale for that action.

9.4 The Safeguarding Disclosure Report will be read by those in the employee/volunteer's management structure and sent to the Director with responsibility for Safeguarding via safeguarding@cswgroup.co.uk.

See Appendix 2 - Safeguarding Disclosure Report Flow Chart

10. Recording Safeguarding Information

10.1 Definition: very occasionally we may receive information from another agency relating to a young person that imposes restrictions on how we work with them including potential safeguarding risks to others. If an adviser receives this type of information, it is vital that they do not keep it to themselves because they do not know who else may have cause to work with the individual. Any information in this category should be recorded under Safeguarding and discussed with a manager.

10.2 If we are provided with safeguarding information as above the employee:

- Confirms that it has been reported to the relevant service and check who is the lead contact.
- Ask "is there anything I should know before meeting with the individual/anything that might impact on how I work with the individual?"
- Identify any potential safeguarding risk for others
- Discuss the information with their line manager.
- Record the conversation on relevant database. For Transitions use Safeguarding Information history (CCIS) and mark as sensitive where appropriate (see also recording Safeguarding Issues for Young People on CCIS/Recording sensitive notes on CCIS).

NB: If the safeguarding information has not been reported i.e. we are the first organisation to receive the information, then the full Safeguarding Disclosure process should be followed.

See Appendix 3 – Flowchart for Receiving Safeguarding Information

11. Change of Employee or Volunteer

11.1 At certain times it is necessary to change an employee or volunteer who is working with an individual. In situations where a child/young person/vulnerable adult have complex needs this

referral needs to be detailed to prepare the new employee or volunteer. The verbal handover will be recorded on the relevant database.

- 11.2** On some occasions it may not be possible to provide a verbal handover (for example an employee/volunteer may be on sick leave). It is therefore important that records are completed in a timely manner and are of sufficient depth that another employee/volunteer can pick up the case and support the individual fully.

12. Employee Support

- 12.1** Employees and volunteers who raise a safeguarding incident will be offered appropriate support, in addition to general supervision. This support may include a referral to the Employee Assistance Programme counselling service.

13. Reporting

- 13.1** Safeguarding incidents will form part of CSW Group reporting to Commissioners.

14. Audit

- 14.1** Safeguarding reports will be reviewed by line managers whilst the case is open.

15. Policy Review

- 15.1** This policy will be reviewed annually.

16. Keeping Individuals Safe

- 16.1** If an employee or volunteer believes an individual is at risk, they **MUST** act.
- 16.2** If there is clear evidence of imminent danger or significant harm is likely, action must be taken immediately.
- 16.3** If there is any doubt the employee/volunteer should refer to their line manager for advice. If the line manager is not available the situation should be immediately referred to the second line manager or, in their absence, another CSW Group manager.
- 16.4** The employee/volunteer should use the flowchart (Appendix 2) to guide their actions.

Approved

A handwritten signature in blue ink, appearing to read 'Chris Saxby', written over a light yellow rectangular background.

Chris Saxby
Managing Director

Appendices

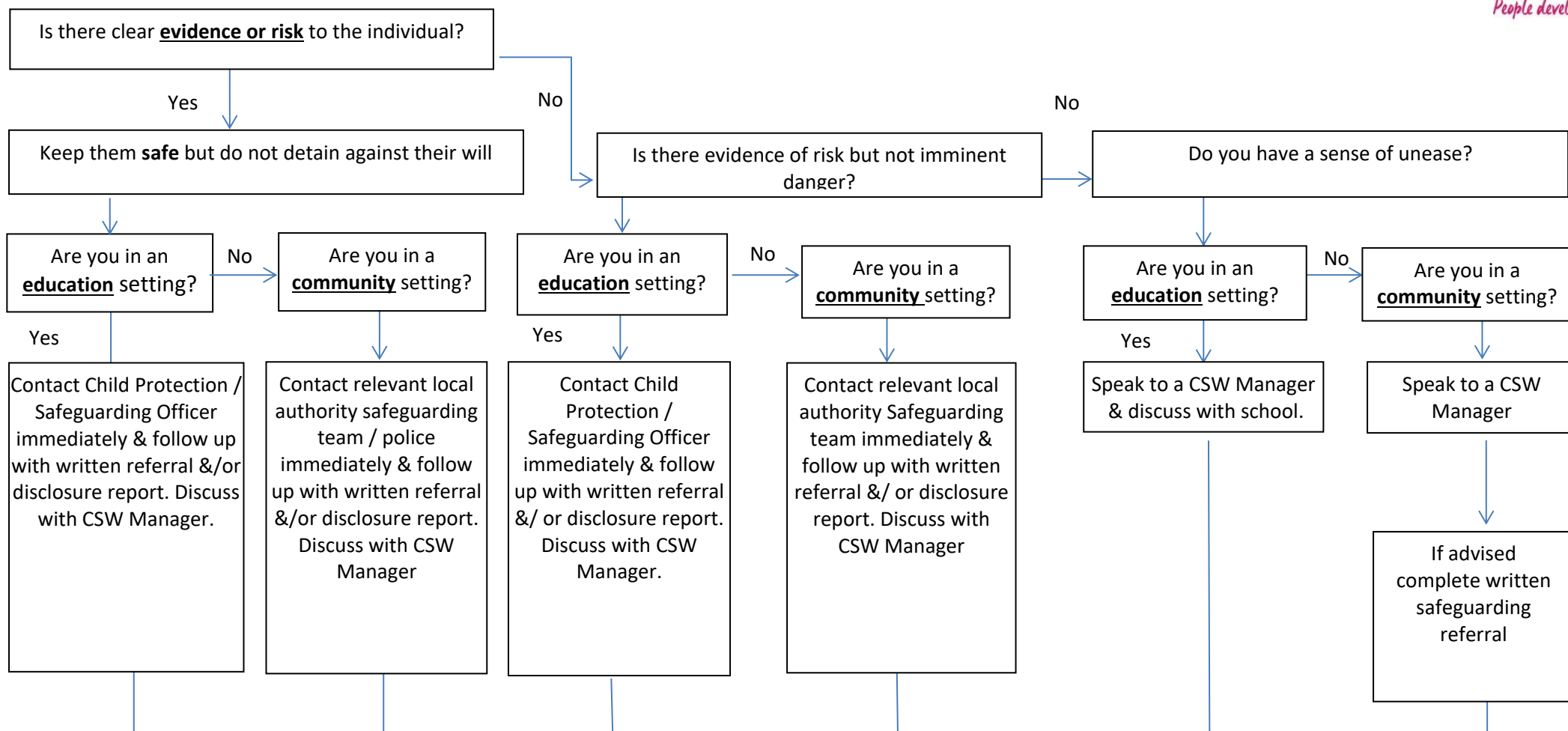
1. Links to Local Authority safeguarding websites
2. Flowchart for managing safeguarding incidents – Safeguarding Disclosure Report Flow Chart
3. Flowchart for receipt of safeguarding information (non-disclosure) – Receiving Safeguarding Information Flow Chart

Appendix 1:

Websites for Local Safeguarding Policies and Procedures

The correct policy and procedures for the Local Authority area in which you are delivering your service MUST be followed.

| Local Authority | Website |
|------------------------------|---|
| Bath and North East Somerset | https://swcpp-banes.trixonline.co.uk/ |
| Bristol | https://swcpp-bristol.trixonline.co.uk/ |
| Cornwall and Isles of Scilly | https://swcpp-cornwallscilly.trixonline.co.uk/ |
| Devon | https://swcpp-devon.trixonline.co.uk/ |
| Dorset | https://pandorsetscb.proceduresonline.com/ |
| Gloucestershire | https://gloucestershirescp.trixonline.co.uk/ |
| Hampshire | https://www.hampshirescp.org.uk/professionals/procedures/ |
| North Somerset | https://swcpp-northsomerset.trixonline.co.uk/ |
| Plymouth | https://swcpp-plymouth.trixonline.co.uk/ |
| Portsmouth | https://www.portsmouthscp.org.uk/7-information-for-professionals-and-volunteers/ |
| Somerset | https://swcpp-somerset.trixonline.co.uk/ |
| South Gloucestershire | https://swcpp-southglos.trixonline.co.uk/ |
| Southampton | https://southamptonscp.org.uk/workersandvolunteers/policies-and-guidance/ |
| Swindon | https://swcpp-swindon.trixonline.co.uk/ |
| Torbay | https://swcpp-torbay.trixonline.co.uk/ |
| Wiltshire | https://swcpp-wiltshire.trixonline.co.uk/ |



Record fully on relevant database and complete our Safeguarding Disclosure Report (attaching any relevant notes). **Confirm receipt of Referral**

Confirm **outcome of referral within 3 working days**: Accepted/ Rejected. Do not give up.

If you feel inappropriate action / no action has been taken and there is a threat of harm, follow up with school / local authority and line manager.

Send Safeguarding Disclosure Report and any subsequent updates to your manager. Use support services available to you to debrief.

