

Safeguarding Policy

POLICY STATEMENT

Pact is committed to protecting children and adults from harm, and to promoting their welfare and well-being. We aim to create an atmosphere where adults and children who use our services feel welcomed, valued and safe. We recognise that we have a duty of care for all of those for whom we provide services and activities.

We aim to work constructively and effectively with HM Prison and Probation Service, and other partners and statutory bodies to promote best practice, and a joined up and integrated approach to safeguarding. We aim to act as advocates for families in our work within prisons and the criminal justice system, and endeavor to promote good practice to ensure that their needs and welfare are fully considered.

WHO THIS POLICY APPLIES TO

All Pact People, including employees, relief and sessional workers, trustees, volunteers, associates, students and ROTL placements, will be provided with our safeguarding policies and procedures, and will be required to work within them at all times. Some elements of this policy are directed to employees only and where appropriate will explicitly say so. All agents, sub-contractors and partner agencies working on Pact-managed premises, or working under Pact management within multi-agency teams, will be informed of our policies, and will be considered to be bound by them.

WHERE THIS POLICY APPLIES

This policy applies to all Pact People, irrespective of location or job role.

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POLICY

1. Definitions

'Safeguarding' is a term used to mean the act of protecting children and vulnerable adults from risk of harm or ill treatment. It refers to the specific act of preventing harm to an individual's health or development, ensuring to the best of our ability that children and adults with whom we are in contact are in safe circumstances with effective care. It also refers to the act of taking action over any concerns, in accordance with our belief that safeguarding is everyone's responsibility.

'Children' are defined in the Children's Act 1989 as anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital, in prison or in a Young Offenders' Institution, does not change his or her status or entitlement to services or protection under the Children Act 1989 (Working Together, Chapter 1, 1.17).

'Vulnerable Adults' are people over 18 who are, or may be, in need of community care services by reason of mental or other disability, age or illness. A vulnerable adult may be unable to take care of themselves, or unable to protect themselves from significant harm or serious exploitation. Examples may be those who have a physical or sensory disability, are physically frail or have a chronic illness, including mental illness or dementia. It also includes those who have a learning disability, misuse drugs and/or alcohol or have social or emotional problems. A person's vulnerability will depend on their circumstances and environment, and each case must be considered individually.

'Abuse' is a term used to describe acts of harm. Different forms of abuse, which may be isolated incidents or ongoing and may be perpetrated as the result of deliberate intent, negligence or ignorance. These may include, but are not limited to the following:

Physical abuse Includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

Sexual abuse includes rape and sexual assault or sexual acts to which a vulnerable adult has not consented, could not consent or was pressured into consenting. It also includes any direct or indirect sexual activity with a child under 16, such as exposure to indecent or pornographic material, sexual acts or grooming with the end goal of sexual activity.

Psychological/emotional abuse includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supporting networks.

Neglect and acts of omission includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Discriminatory abuse includes abusive behaviour, harassment or similar treatment targeting an individual(s) on the basis of their age, being or becoming a transsexual person, being married or in a civil partnership, being pregnant, their race (including colour, nationality, ethnic or national origin), their gender, their religion or belief or lack of belief, their sexual orientation, or their disability.

Financial or material abuse can include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, overcharging or carrying out unnecessary work, or the misuse or misappropriation of property, possessions or benefits.

There are also emerging types and methods of abuse, including:

- Sexual exploitation.
- Female Genital Mutilation (FGM) and breast ironing.
- Trafficking of people in order to exploit them sexually, financially, via domestic servitude (also known as 'Modern Slavery'), or via involvement in activity such as the production and sale of illegal drugs (also known as 'County Lines').
- Abuse linked to beliefs such as spirit possession or witchcraft.
- Radicalisation and the encouragement or coercion to become involved in terrorist activities.
- Abuse via online methods, e.g. from adults seeking to develop sexual relationships with children or to use sexual or abusive images of them.
- Domestic violence, either witnessing violence between adult family members, or being subjected to coercion or violence in an intimate relationship.

Pact recognises that abuse can take many forms; it does not have to fit comfortably into any of the above. Abuse can be perpetuated by one vulnerable adult/child towards another; this is still abuse and should be dealt with accordingly. A vulnerable adult may also be neglecting themselves which could also be regarded as abuse.

'Children's/Adult's Services' are the local authority teams of social workers who are responsible for safeguarding. Terminology changes from time to time, so these may also be known by similar terms such as 'Social Services', or 'Children's Team'. Social Services departments are now generally split into Adult and Children's teams but some local authorities still refer to the whole as 'Child and Family Services'. As many of the families of prisoners or children visiting prisons do not live locally, where it is necessary to contact Children's/Adult's Services, Pact People should check with the area where the family normally reside in order to ascertain which area is responsible. If this information is not available, the services local to the prison should be contacted.

'Safeguarding Partnerships' replaced Local Safeguarding Children's/Adults Boards in local authorities from September 2019. These new local safeguarding arrangements are led by three safeguarding partners: local authorities, chief officers of police, and clinical commissioning groups. These partners work collaboratively to uphold safeguarding practice through agreeing and implementing local safeguarding strategies, conducting local case reviews and holding each other to account.

LADO is the term given to the Local Authority Designated Officer, a post which has the responsibility of managing allegations of abuse against other professionals. Each local authority is required to have a system in place to deal with allegations and concerns about staff or volunteers in their own geographical area.

2. Designated Officers

Pact has a named person for safeguarding in accordance with best practice. This is currently: **Joanne Mulcahy, Assistant Director of Services.**

Pact operates a Designated Officer structure which aims to support the workforce in identification, recording and reporting of suspected abuse. Each regional Head of Services Delivery and Development, Deputy HoSDD and Service Manager acts as a Designated Officer for their region as an integral part of their role, and other staff may take up the role as appropriate. Where a Pact Person requires support, or needs to notify someone of action taken, they should first speak with a line manager. If a safeguarding form (C1) has to be completed and a referral made, this information should be shared with the Designated Officer for the region, or a deputy if they cannot be contacted or if waiting for their reply would cause unnecessary delays. Information about when to complete a C1 form is found in the mandatory safeguarding training.

Where neither the regional Designated Officer nor the deputy can be contacted, it is appropriate to contact the Designated Officer or deputy for another region, who will advise as appropriate. If a contact is needed outside of normal office hours, the out-of-hours emergency number should be used, which diverts to an on-call Designated Officer.

All Designated Officers will complete a Designated Officer induction to prepare them for this part of their role, and are expected to attend an annual refresher Development Day. In addition, each Designated Officer will receive a copy of guidelines for Designated Officers which details their role and responsibilities.

3. Recruitment and vetting

All Pact People, including all employees, relief and sessional workers, volunteers, associates, students and ROTL placements are subject to careful and rigorous selection and vetting processes as detailed in the Recruitment & Selection Policy and Volunteer Policy.

Pact has a risk based approach to vetting and vetting requirements are determined according to the nature of the role, its location (e.g. prison or community) and level of contact with children and vulnerable adults.

4. Training and development

Once in post, Pact People are subject to a role specific and organisational induction. All Pact People are expected to complete a mandatory training module on safeguarding which covers the basics of protection and Pact's recording and reporting procedures. In addition, Pact employees, where relevant to the role, are also encouraged to source and attend a level one or two safeguarding children and/or adults course in their local area in order to cover forms of abuse and their indicators in more detail, and to learn about local contacts and procedures. Staff are required to attend refresher Pact Safeguarding training every two years, and a record of this is held centrally by the HR team. HR will conduct regular audits of completed mandatory training. Line Managers of relevant staff will ensure that staff have completed the necessary training, including refresher courses. More information on training can be found in Pact's Training and Development Policy.

5. Identifying possible abuse

Pact People can often be uniquely placed to identify signs within families that may indicate that something is not right. They are encouraged to be vigilant in all aspects of their role, and training completed through Pact and the Local Authority will cover common indicators.

As 'safeguarding' essentially means protecting people from harm, it is vital to be aware of signs that may be subtle, may come from third parties or may arise from intuition, as well as more accepted signs that abuse has already taken place such as physical marks or direct disclosure. These should be taken seriously and explored further where necessary, by asking the person how they are and monitoring their situation. It is worth remembering that one of the first indications that all is not well is a change in normal behaviour.

There are times when suspicions of abuse may be raised by a third party with whom we work, such as a member of prison staff, or a representative from another third sector agency such as a drug worker. In these instances, it is appropriate to advise the person to pass their concerns to the relevant agency as usual. Pact employees are discouraged from taking this responsibility on themselves as the information belongs to the third party and as such they should follow their own organisation's reporting procedures. If the person is unfamiliar with what to do, it is appropriate to support them as far as Pact feels confident in doing so. A spirit of partnership should be nurtured, and relevant information shared if the welfare of the person will be furthered by doing so. If in doubt, Pact People should seek advice from a manager or Designated Officer.

An exception to this is when you are a Pact Person visiting a prison for example a Groupwork Facilitator or part of the Fundraising team, or visitors to a prison who are under Pact's responsibility or supervision, for example a funder or a consultant. In this case, the person should make their Pact contact aware of their concerns and with the assistance of their Pact contact, they should together ensure the usual reporting mechanisms are followed.

There are times when a direct disclosure of abuse may be made. Pact has a separate document giving guidance on handling these situations.

6. Recording and reporting

When potential abuse has been identified, it is important to record it appropriately. The C2 flowchart is a step-by-step guide to reacting to identification of abuse (appendix 2).

If the suspicion is low-level then it should be noted in the Blue Book, a hard-copy book which is stored in a secure location on many sites as a central point of observations. An entry in the book can be made by anyone who has witnessed something of concern which is not immediately serious or urgent but which seems out of character, including volunteers, representatives of Pact, prison staff etc. The entries in the Blue Book are checked and signed weekly by a manager who looks for repetitive entries about the same person. If three concerns are logged about the same person, then the manager will instigate the appropriate action.

If the suspicion is more than a small concern but not serious enough to merit a referral to Social Services, information should be recorded on the systems used by the service, such as E-Cins or other database as appropriate, using a 'Safeguarding Alert' category. Working in conjunction with the family, Pact should support referrals to appropriate agencies who can work with the family with regards to the concerns before they become more serious, tracked through normal case recording channels.

If a concern is serious and immediate, Social Services should be informed over the telephone as soon as possible, with this followed up in writing within 24 hours. In some instances, Social Services will require their own form to be completed with as much information as possible, however if waiting for this form would cause a delay then it is possible to send Pact's C1 reporting form (appendix 1) in its place. Following the immediate response to the incident, the Pact person concerned should contact a Designated Officer immediately to inform them of the incident and arrange an appropriate, secure way of sending the referral form. If the situation is an emergency, Pact People are encouraged to call 999 for assistance, without delay.

When a referral has been made, it is good practice to follow it up within 24 to 48 hours to see if it has been allocated, usually with a telephone call. Social Services should share with the referrer what action has been taken even if they are not able to inform them of the outcome. If you are not satisfied that it has been taken seriously, or if

nothing is being done, ask to speak with a more senior member of Social Service, such as a team manager, to escalate your concerns. It is important that the C1 is updated with this further information and any other updates as appropriate.

Serious incidents require a report to the Charity Commission; what constitutes a 'significant incident' depends on the viewpoint of the charity. It may concern:

- harm to Pact's beneficiaries, staff, volunteers or others who come into contact with us through our work;
- loss of Pact's money or assets;
- damage to Pact's property;
- harm to Pact's work or reputation.

In these circumstances, the procedure under the Serious Incident Policy should be followed. The Lead Designated Officer for Safeguarding will inform senior management and Trustees of any incidents which may require reporting and support the completion of relevant paperwork.

7. Information sharing

Pact recognises that sharing information is vital to safeguarding, and Pact is committed to learning from serious case reviews where it is suggested that information sharing improvement could have led to different outcomes for children and vulnerable adults who ultimately came to harm.

Pact People must ensure that information being shared is with the right person, for the right reasons and in the right degree. It is also important that we only share our own information and not that of others without their consent, unless it would place someone in danger. If, for example, a Social Worker wishes to know how many times a certain family has been in to visit a prisoner, that is not our information to share and the enquirer should be directed to write to the prison governor to formally request it. If we are being asked to share significant information, it is also acceptable to ask the person to request this in writing, outlining the reasons for their request.

If you have information or an indication that a child or vulnerable adult is being placed at risk, such as having contact with a person they should not be, trafficking drugs or being used as part of a crime, you must inform the Police, or the Prison's Security department/Duty Governor, immediately. This is in addition to following Pacts Safeguarding procedure.

Pact is committed to working within the law, and in accordance with HM Prison Service regulations and Probation policies at all times. If in any doubt as to the correct course of action in a specific instance, seek guidance from a manager or Designated Officer.

Pact Managers should also ensure that up to date contact details for local Children's and Adults Social Care teams, including out of hours numbers, and other relevant

agencies such as Local Safeguarding Partnerships, are available to all staff on a C3 Contact form at each site (appendix 3).

8. Allegations against young people

Sometimes, allegations may be made from an adult or child against another child. This may be a direct disclosure, an observation or be brought to the attention of Pact from another source, e.g. a parent or carer, or Social Services.

In the event of an allegation against a young person, a decision may have to be made about whether the incident constitutes bullying or is a child protection concern. Behaviour is classed as abuse if it has led to the victim suffering significant harm; this would normally include all incidents of sexual assault and all but the most minor of physical assault. Also of concern is if the behaviour is a pattern rather than a one-off, where there is a significant power balance, e.g. more than 2 years age difference, being a helper, volunteer or informal leader, or if the victim is significantly more vulnerable.

Allegations of abuse against a young person should be dealt with as other safeguarding concerns, by contacting emergency services where there is clear and immediate danger, or Social Services where the danger is significant but not immediate. A decision needs to be taken about whether to inform the family of the child who made the allegation, and the child who is the victim and this is weighed up in the same way as all other decisions about telling the family, with a risk-based approach which also balances the child's wishes with the parent's right to know.

Allegations of abuse against a child should be recorded on a C1 as per Pact's normal policy. If you are unsure about whether a situation constitutes bullying or abuse, please discuss with your Designated Officer, or with the NSPCC Helpline on 0808 800 5000.

9. Allegations against Professionals

Where we become aware of, or develop suspicions about, another professional and their conduct towards children, we have a duty to report this to the Local Authority Designated Officer (LADO). Each local authority has the responsibility to manage allegations against staff or volunteers working in any capacity for any organisation. If any Pact Person becomes aware of an allegation, or become suspicious of any professional member or staff or volunteer, they should contact a Designated Safeguarding Officer immediately.

The Designated Officer will immediately inform Pact's lead for Safeguarding and the criteria and contacts for the locality will be checked. Where the incident or suspicion meets the criteria, the Lead Designated Officer will submit a referral to the LADO for that area. A referral should ideally be made within one working day of being made aware of the allegation or suspicion.

Criteria for referral to a LADO include staff, volunteers, foster carers or other professionals (including Police, school Governors and others in positions of authority) who:

- have behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against children, or related to a child;
- behaved towards a child or children in a way that indicated they may pose a risk of harm to children.

Allegations of historical abuse should be treated in the same way.

10. Allegations against Pact People

If information is received that a Pact employee or volunteer is suspected of abuse of a child or adult, the person receiving this information must contact either their line manager/ volunteer coordinator, senior manager or HR Advisor immediately. Following this, an immediate course of action will be decided; usually this will involve an investigation dealt with under the disciplinary policy for employees and workers, or the volunteering handbook for volunteers. For serious allegations, it may be necessary to make contact with the police, and it is mandatory that the LADO for the area in which the person works is informed of the allegation, using the same process as in section 9. The subject of the allegations may be suspended until the investigation has been completed. Confidentiality is paramount in such cases. Support for employees will be offered through the Care First scheme.

In the event the allegations are proven or the individual leaves before an investigation or disciplinary process is concluded, Pact will make a referral to the Independent Safeguarding Authority where it is appropriate to do so.

In the aftermath of such a situation, there may be issues of communication (rumour and fact), guilt and blame (if suspicions have been around for some time), impact on individuals and teams, and an impact on the organisation as a whole. Careful consideration will be given in each case to the sharing of information and the provision of appropriate support, and the opportunity to debrief after an event will be routinely considered. Deciding on who should be involved in this will be related to the extent of knowledge about the concern and the impact on particular individuals - staff or/and service users.

If you have any concerns about the behaviour of another worker or individual with regard to safeguarding, you must NOT keep this to yourself, but must share it

immediately or as soon as possible with your line manager/volunteer coordinator, senior manager or HR Advisor. If the concern relates to one of these individuals, you have a responsibility to escalate the matter to a more senior manager, director or the Chief Executive. Concerns will be dealt with under the Whistleblowing Policy which provides protection against unfair treatment for raising a serious concern; you must not be fearful of recriminations but must always prioritise the welfare of any children or vulnerable adults concerned.

11. Safeguarding and research

From time to time, Pact may permit or commission research or evaluation which facilitates direct access between an external researcher and service users. Research requests are submitted to Pact using a dedicated form and where the research may involve emotional or triggering conversations, a distress management plan is required to be completed and the project to have approval from a reputable ethics board before being signed off by Pact. Supervisor names and email addresses are collected in order to verify information or provide feedback where necessary.

If researchers are working on-site, they will not be unsupervised when in contact with vulnerable adults or young people. If their intention is to recruit young people or vulnerable adults through a Pact service, then follow up unsupervised, they must show an in-date DBS to Pact at the point of research application. At the point that the person then willingly and independently becomes a participant in the research of the third party, responsibility for safeguarding transfers to the third party under the regulations and procedures of their governing establishment.

RELEVANT LAW/GUIDANCE

- *Children's Act 1989* (as amended)
- *Protection of Children Act 1999*
- *National Framework 'Safeguarding Adults' 2005*
- *Working Together to Safeguard Children : A guide to inter-agency working to safeguard and promote the welfare of children 2010*
- PSO/PSI relevant to individual prison establishments
- 'Dealing with allegations made against another child', NSPCC guidance
- Children and Social Work Act 2017

RELATED PACT POLICIES

The following Pact policies are relevant to this subject:

- Recruitment & Selection Policy
- Training & Development Policy
- Probation Policy & Procedure
- Pact GDPR Policy
- Confidentiality Policy

- Whistleblowing Policy
- Anti-terrorism Policy
- Modern Slavery Policy
- Research and Evaluation Policy
- Media and Social Media Policy
- Serious Incident Policy

Version	Amendment	Date	Author	Authorised
1	First authorised issue	9/11/16	JM, Head of Service Delivery & Development	Board
2	Covering both children and adults at risk. Better reflecting Pact's community work. Refer to separate policies on recruitment, vetting, training and development. Change to designated officer processes.	12/12/18	JM, Head of Service Delivery & Development	Board
3	Minor wording and formatting changes	14/11/19	JM, Head of Service Delivery & Development	AKD, Chief Executive
4	<p>Section 1: Update to Local Safeguarding Boards to reflect operational change to Safeguarding Partnerships, as laid out in Children and Social Work Act 2017. Added LADO to definitions.</p> <p>Section 4: Updates to training requirements including local authority training now desirable rather than mandatory.</p> <p>Section 6: Added requirement to inform Charity Commission to reporting procedures.</p> <p>Added section 9: allegations against other professionals.</p> <p>Section 10: Added requirement for LADO reporting in the case of suspicions against a Pact Person.</p>	16/10/20	JM, Assistant Director of Services	

	<p>Relevant guidance: Added Children and Social Care Act 2017 to relevant documents list.</p> <p><i>Feedback requested from all staff 7.10.20, no feedback received.</i></p>			
5	Section 7: replaced word 'offender' with 'a person'.	20/9/21	JM Assistant Director of Services	
6	Annual review. No changes made.	08/11/22	JM Assistant Director of Services	
7	<p>Policy statement: removed reference to CRCs (p1).</p> <p>Section 5: Added exception for Pact visitors (p7).</p> <p>Section 11: Safeguarding and research section added (p11).</p> <p>Related Pact policies: added Research & evaluation Policy and Media & Social Media Policy (p12).</p>	30.8.23	<p>JM Assistant Director of Services</p> <p>Peer reviewers: Deb Hornbuckle & Aimee Hutchinson.</p>	Board

Appendix 1: Safeguarding Incident Report Form

Details of individual

Details of carers/ parents are needed if the individual has additional needs and is under the age of 21.

Name of individual:		
Gender:	Age:	Date of birth:
Ethnicity:	Language:	Additional needs:
Name(s) of parent(s)/carer(s): (If applicable)		
Name of Prisoner (if this referral is generated by prison based staff):		
Prisoner's Number: A_____		
Individuals home address and address(es) of parents/ Carers(if applicable)		

Your details

Your name:	Your position:	Date and time of incident or report:
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Are you:

Reporting own concerns

Responding to concerns raised by someone else

If you are responding to concerns raised by someone else, please provide their name and status (e.g. Sibling or prison officer) or name and position within the organisation/prison/agency:

Report

Please provide details of the incident or concerns you have, including times, dates, description of any injuries, whether information is first hand or the accounts of others, including any other relevant details:

The individual's account/perspective (if you have information on this): Write an account in the words they have said to you.

Please provide details of anyone alleged to have caused the incident or to be the source of any concerns:

Provide details of anyone who has witnessed the incident or who shares the concerns:

Please provide details of any children that may be at risk regarding the incident.

Have you spoken to the individual's parents/carers or any other agency you are aware that they are involved with (e.g. referral agencies, if appropriate). You may have to ask an individual's permission to share the incident or concern with others.

If so, please provide details of what was said.

Are you aware of any previous incidents or concerns relating to this individual and of any current risk management plan/support plan? If so, please provide details (include here details of any previous blue book entries):

Summary of discussion with supervisor/manager:

Has the situation been discussed with the Pact Designated Officer for safeguarding concerns? Yes/No (delete as appropriate)

If so, please summarise the discussion, including the name of the DO spoken to:

After discussion with the supervisor/line manager and Pact Designated Officer, do you still have safeguarding concerns?

Yes/No (delete as appropriate)

Have you informed the statutory safeguarding or protection authorities?

- **Police: Yes/No**

Date and time:

Name and phone number of person spoken to:

- **Local Authority Child or Adult team: Yes/No**

Date and time:

Name and phone number of person spoken to:

Action agreed with safeguarding authorities:

What has happened since referring to statutory agency(ies)? Include the date and nature of feedback from referral, outcome and relevant dates:

Please give details of any further steps taken to provide support to the individuals and family, and any other agencies involved:

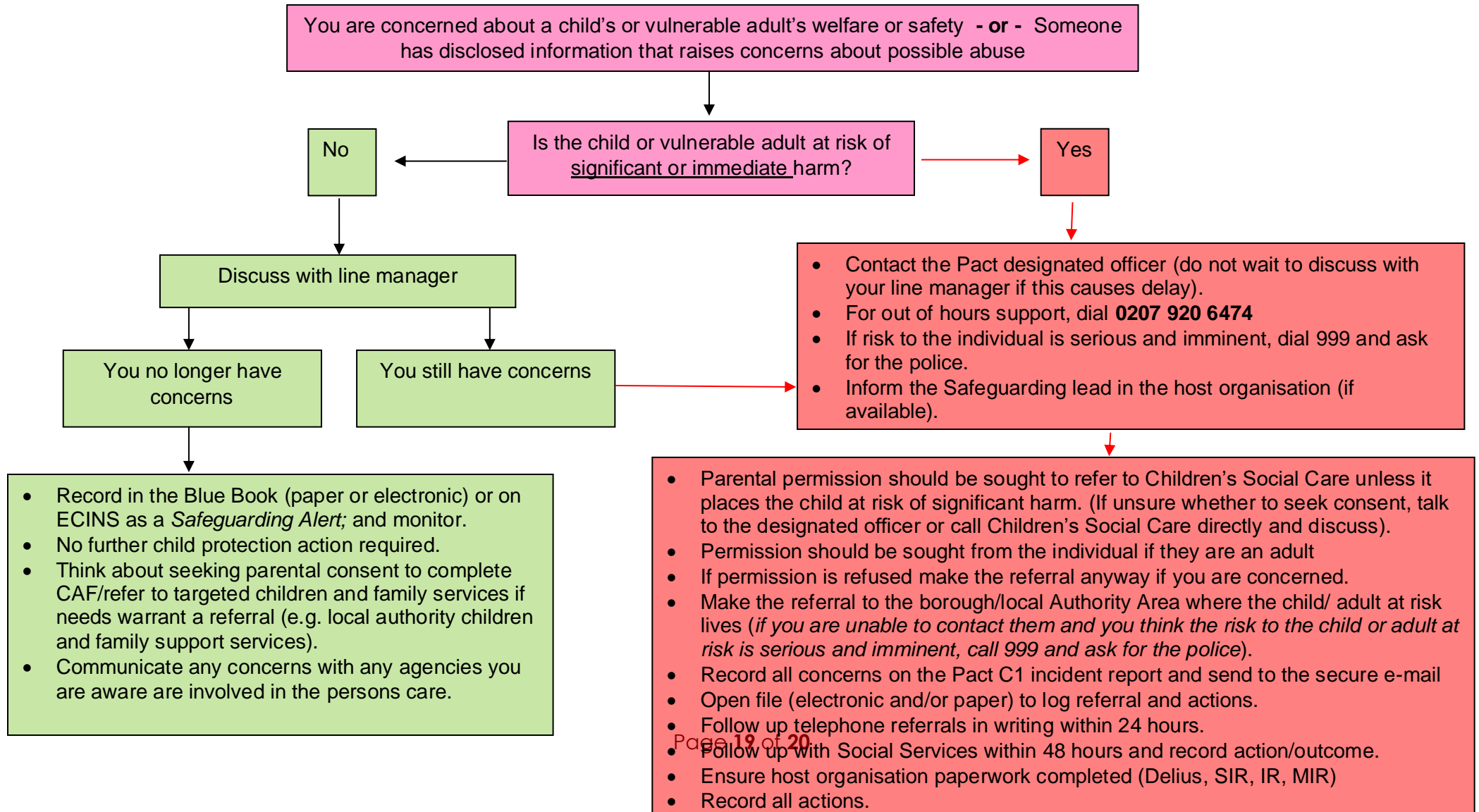
Signed	Date and time	Name and position

To be completed by the line manager or Pact Designated Officer for Safeguarding

<u>Name</u>	
<u>Date C1 form received</u>	
<u>Has a discussion taken place with the person who generated the C1</u>	<u>(delete as appropriate)</u> <u>Yes/No</u>
<u>Action taken:</u>	

Appendix 2

Safeguarding procedure.....What should I do?



Appendix 3: Relevant contacts

Relevant Person	Contact details
Supervisor/Manager:	
Host organisation Safeguarding lead (if relevant):	
Pact Regional Designated Officer:	
Pact Deputy Regional Designated Officer:	
Pact out of hours number:	020 7920 6474
Local police:	
Local Authority Duty Officer for children:	
Local Authority Duty Officer for adults:	
NSPCC Helpline:	0808 800 5000 or help@nspcc.org.uk
Pact CJSM email:	Pact.safeguarding@prisonadvice.cjsm.net