

Safeguarding Policy

Document Title: Safeguarding Policy

Date: 8th November 2018

Version: V1

Document Authorisation

QA by: John Stirling

Prepared by: Stuart Crosby

Authorised by: Scott Lloyd

Document Control

Title Safeguarding Policy

Authors Scott Lloyd

Doc Ref -

Owner (Responsibility for Approval of Issued Versions)

| Name | Role | Date | Issue |
|-------------|----------|----------|-------|
| Scott Lloyd | Director | 08.11.18 | 1.0 |

Change History

| Issue | Date | Author/Editor | Details of Change |
|-------|------|---------------|-------------------|
|-------|------|---------------|-------------------|

Other Policies linked or changes will impact on

| Policy | Link or impact |
|--------|----------------|
|--------|----------------|

Equality & Diversity Policy

Prevent Policy

Whistle Blowing Policy

Table of Contents

| | | |
|----------|---|--------------|
| | Document Control | 2 |
| 1 | Safeguarding Policy Statement | 4-7 |
| 2 | Guidance to Responding to Suspicion/Evidence/Disclosure of Abuse | 7-12 |
| 3 | Abuse Disclosure Form | 13-16 |
| 4 | Safe Working Practices | 17-20 |

1. FRESHFIELD SAFEGUARDING POLICY STATEMENT

Introduction, Scope and Purpose

1. Safeguarding is an all-encompassing term used to describe many aspects of life including:
 - Learner health, safety and wellbeing
 - Bullying
 - Harassment and discrimination e.g. homophobic abuse
 - The use of physical intervention
 - Meeting the needs of learners with medical conditions
 - First aid
 - Alcohol, drug and substance misuse
 - External events (e.g. trade fairs)
 - Internet safety
 - The security and safety of the Freshfield estate/other places of learning
2. The policy covers all Freshfield learners, whether they are based in a training centre/classroom or elsewhere (e.g. on employer premises). It is the responsibility of all staff to understand their role in supporting safeguarding across ES and for familiarising themselves with the appropriate procedures and other policies that support this overarching document.

Key Principles

3. Freshfield will operate within the following key principles in relation to safeguarding:
 - Everyone will be treated with respect and with courtesy by staff and learners, in an environment with a zero tolerance approach to harassment and discrimination
 - All training rooms, communal areas, facilities and equipment will comply with legislative health and safety standards
 - Freshfield will work with learners and other agencies to promote a safe and healthy culture
 - Freshfield will develop partnerships to proactively protect young people and vulnerable adults from abuse (including harm and neglect)
 - Staff will be trained and will have a clear understanding of personal safety and good safeguarding practices
 - Freshfield will work with learners to promote their own personal health, wellbeing and safety. This will include e-safety themes such as sexting, sharing personal information via Facebook, and trolling via smartphones
 - Learners, where appropriate, will receive confidential advice, guidance and support for a range of issues which they may face. Such information might involve signposting to an external professional/organisation (e.g. GP or local council service)

Learners' entitlement

4. In order to promote a healthy and a safe environment, our learners will be entitled to the following rights:
 - To make a disclosure to any member of staff, and to know that the disclosure will be dealt with quickly and sensitively
 - To learn in an environment with a 'zero tolerance' approach to bullying or harassment
 - To be made aware of some of the basic principles of safer learning and safeguarding relevant to the programme being completed
 - To be made aware of how to access support on personal health and safety issues, either within Freshfield or from external agencies
 - To be provided with up to date information around personal safety issues
 - The opportunity to comment and feedback on the extent to which Freshfield and its courses promote and maintain wellbeing and personal safety
 - To learn about interpersonal and communication skills that promote and establish a welcoming, safe and respectful environment

Strands of activity

5. The safeguarding efforts of Freshfield are supported by the following core strands of activity, where relevant, and working procedures signposted within this section.

Safe learning

6. The principles of 'Help Children Achieve More' (formerly 'Every Child Matters') and safeguarding will be embedded within Freshfield teaching and learning practices, and within Freshfield quality assurance and quality improvement frameworks. We will operate safe recruitment practices as outlined in the relevant section of this policy.
7. Consistent with the 'be healthy' strand of 'Help Children Achieve More', we are committed to attempting to engage learners on issues related to financial health, mental health and physical health – in order to improve their quality of life. We aim to further develop our practice in this area, e.g. through providing learners with sustainable tools with which to make healthy decisions.
8. Our commitment to safe learning is enshrined within our teaching and learning strategy, our quality assurance and quality improvement frameworks, the teaching, learning and assessment observation policy and procedure, our learner code of conduct, and the staff recruitment procedure.

Safe environment

9. Freshfield will provide an environment that is as safe and secure as possible for all users, and at the same time is friendly and welcoming. We will have robust systems and processes in place for staff, for learner identification, and for visitor registration. We will ensure a culture of respect with a zero tolerance stance on bullying and harassment. Health and safety is of paramount importance to us. As such, all our facilities and resources will comply with legislative requirements for health and safety.
10. Our commitment to the safe environment is enshrined within every stage of the learner journey, e.g. through our Safe Working Practices.

Safe recruitment

11. Freshfield will comply with best practice in the recruitment and training of its staff, in line with the formation of the DBS (i.e. the merging of the ISA and the CRB). Staff will undergo the appropriate DBS checks for their role where applicable and every 3 years thereafter, and we will ensure that all staff undertake mandatory safeguarding training appropriate to their role. Staff will understand the principles of safe working practices and how not to put themselves in situations that compromise themselves or learners.
12. Our commitment to safe recruitment is enshrined within our interview paperwork and within the employment of staff/engagement of learners with a criminal record. Once in post, should any allegations be made about staff regarding the safety of young people/vulnerable adults, these will be passed to the Operations Manager. Immediate suspension might be necessary, as might the passing of information to external parties.

Protecting young people and vulnerable adults

13. Freshfield recognises that the term 'abuse' includes physical abuse, emotional abuse (including domestic abuse), sexual abuse, financial abuse, neglect, harm, and failing to act to prevent harm. ES will take 'Working Together to Safeguard Children 2013' into account when determining safeguarding provision; we have a legal obligation to protect young people and vulnerable adults from abuse. Freshfield will ensure that disclosures made by learners are dealt with quickly and appropriately. All staff will be trained in the appropriate response to learner disclosure and in the correct procedure for dealing with concerns about a learner. We will work with learners to proactively protect them from abuse and to prevent learners being placed in an abusive situation.
14. Our commitment to the protection of young people and vulnerable adults is enshrined within all four sections of this Freshfield Safeguarding Documentation.

Governance and reporting

15. Freshfield will establish a safeguarding steering group to oversee its work in this area. The steering group will be chaired by the Operations Manager and will meet at least once quarterly.
16. The Freshfield Director and Executive Directors will review safeguarding quarterly; at this review progress against Freshfield action plan for safeguarding, as well as reviewing anonymous reports of safeguarding incidents will take place. It will also incorporate information on equality and diversity.

Key responsibilities

The Director and Executive Directors - will have overall responsibility for ensuring that Freshfield meets its safeguarding obligations. They will be responsible for the approval of relevant safeguarding policies and procedures. They will also take responsibility for ensuring that all staff have an understanding of safeguarding, and that safeguarding is given high priority within the business.

The Senior Designated Person (for abuse disclosures) – is Rachel Hayes. She will be responsible for ensuring that processes and procedures for the protection of young people and

vulnerable adults are robust and are consistently applied, and that Freshfield fulfils its legal duties, as enshrined within appropriate legislation.

The Operations Manager– is responsible for ensuring that safe recruitment practice is embedded and implemented across Freshfield, and that all staff have received appropriate training and development.

All employees - have a responsibility for completing their training and for familiarising themselves with the appropriate safeguarding policies and procedures. They also have responsibility for ensuring that they understand their own role in the promotion of safeguarding, as well as the appropriate action to take should they receive an abuse disclosure. All staff will take part in Safeguarding training annually as part of Freshfield Mandatory training requirements.

*NB the following **four safeguarding documents** are to be read in conjunction with each other:*

1. SAFEGUARDING POLICY STATEMENT
2. GUIDANCE ON RESPONDING TO SUSPICION/EVIDENCE/DISCLOSURE OF ABUSE
3. ABUSE DISCLOSURE FORM
4. SAFE WORKING PRACTICES

2. Freshfield Training Associates Guidance to Responding to Suspicion/Evidence/Disclosure of Abuse

THE CONTEXT OF ABUSE.

Freshfield acknowledges that:

- Males and females of all ages and from **all backgrounds** can be abused
- Abuse occurs in varied settings, including via **social media** (e.g. Twitter)
- Young people and vulnerable adults can be **perpetrators** of abuse as well as victims
- Young people and vulnerable adults **do not always recognise abuse** as abuse
- All abuse disclosures to staff must be initially **treated as genuine**

Freshfield recognises different categories of abuse:

- **Physical abuse** (including spitting, hitting and kicking)
- **Emotional abuse** (including domestic abuse, e.g. controlling spouse's mobile phone use)
- **Sexual abuse** (including engaging under-18s in the pornography industry)
- **Financial abuse** (including threats from a 'loan shark')
- **Neglect** (including failure to provide food and shelter)
- **Harm** (including preventing someone from accessing education)
- **Failing to act to prevent harm** (including condoning harassment)

Safeguarding is everyone's responsibility. Every member of staff has a responsibility to act as follows:

SUSPICION OF ABUSE.

Staff must report any suspicions of abuse within two hours to the Safeguarding Officer Freshfield Training Associates by phone. NB If a 999 call is necessary e.g. due to serious head injuries, obviously ring 999 first.

The safeguarding designated officer is:

Rachel Hayes, Lead Programme and Quality Coordinator

Contact Details are:

Rachel Hayes

Mobile: 07825683642

Email: rachel@freshfieldstraining.com

Do not contact the parent/carer unless advised to do so by a Director from Freshfield. Doing so could enhance the risk to the young person/vulnerable adult and/or jeopardise subsequent investigation/court proceedings.

Freshfield recognises that a combination of the following* **might indicate that abuse has taken/is taking place:**

- Anger/aggression
- Change in personality (e.g. motivation significantly decreases)
- Dishevelled appearance (e.g. unclean-smelling clothes or ceasing to brush hair)
- Drug/alcohol use
- Early/late arrival or departure
- Expensive possessions (i.e. bribes from perpetrator/s of abuse)
- Flinching (e.g. at loud noises or sudden movements)
- Frequent breaks to visit toilet/use phone
- Homelessness/impending homelessness
- Injuries not seen but mentioned
- Loss of appetite/change in eating patterns
- Memory blanks
- Pregnancy
- Sleeping in the day/drowsiness
- STIs (Sexually Transmitted Infections)
- Taking pain killers
- Tearfulness
- Unauthorised absence
- Very low/very high BMI
- Visible injuries
- Withdrawal (e.g. from other learners)

** Clearly, many of these factors can be present without abuse having occurred. However, staff must always avoid assumptions such as 's/he does not seem the type to be abused'.*

EVIDENCE OF ABUSE.

If you witness a young person/vulnerable adult being abused, only intervene if you do not put yourself/others at risk in doing so. If you can speak to the victim afterwards, reassure him/her that their safety and wellbeing is your priority. Do not put yourself/others at risk afterwards by criticising the abuser, either directly or to the victim.

Staff must report any observed abuse within two hours to the safeguarding officer by phone. NB If a 999 call is necessary e.g. due to serious head injuries, obviously ring 999 first.

Do not contact the parent/carer unless advised to do so by a Director from Freshfield. Doing so could enhance the risk to the young person/vulnerable adult and/or jeopardise subsequent investigation/court proceedings.

Female Genital Mutilation (FGM) under the Serious Crime Act 2015

Background

1. Female genital mutilation (“FGM”) involves procedures that include the partial or total removal of the external female genital organs for non-medical reasons. The practice is extremely painful and has serious health consequences both at the time when the mutilation is carried out and in later life.

2. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new born, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of five and eight.

3. FGM has been a specific criminal offence in the UK since 1985 when the (UK wide) Prohibition of Female Circumcision Act (“the 1985 Act”) was passed. The Female Genital Mutilation Act 2003 (“the 2003 Act”) replaced the 1985 Act in England, Wales and Northern Ireland¹. It modernised the offence of FGM and the offence of assisting a girl to carry out FGM on herself while also creating extra-territorial offences to deter people from taking girls abroad for mutilation. To reflect the serious harm caused, the 2003 Act increased the maximum penalty for any of the FGM offences from five to 14 years’ imprisonment.

Current law

1. Under the 2003 Act it is an offence for any person in England, Wales or Northern Ireland (regardless of their nationality or residence status) to perform FGM (section 1); or to assist a girl to carry out FGM on herself (section 2). It is also an offence to assist (from England, Wales or Northern Ireland) a non-UK national or resident to carry out FGM outside the UK on a UK national or permanent UK resident (section 3).

If the mutilation takes place in England or Wales, the nationality or residence status of the victim is irrelevant.

2. Under general provisions of the law which apply to all criminal offences, it is also an offence to:

- Aid, abet, counsel or procure a person to commit an FGM offence

- Encourage or assist a person to commit an FGM offence
- Attempt to commit an FGM offence; and conspire to commit an FGM offence

Any person found guilty of such an offence faces the same maximum penalty for these offences under the Act.

What to do if you know of someone who is at risk of FGM

- Talk to them about your concerns, but use simple language and straightforward questions;
- Be sensitive and let them know that they can talk to you again;
- Consult a child protection advisor and make a referral to children's social care and/or the police;
- You can access help and support anonymously from the NSPCC FGM Helpline on 0800 028 3550 or email: fgmhelp@nspcc.org.uk
- If you are abroad and require help or advice you call the Foreign and Commonwealth Office on +44 (0) 20 7008 1500;
- If someone is at imminent risk of FGM, you should contact the police immediately

What to do if you have had FGM done to you

- You can seek medical advice and help from specialist health services. There are specialist clinics around the UK and in some of these you can have a reversal procedure.
- Call the NSPCC FGM helpline on 0800 028 3550 for more information or email them at fgmhelp@nspcc.org.uk
- Visit www.gov.uk and search for female genital mutilation.

Cuckooing

Background

Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing. As of the 2010s, **cuckooing** is becoming an increasingly common problem in the South of England.

Who are the victims of cuckooing

Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mums and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

Once they gain control, gangs move in with the risk of domestic abuse, sexual exploitation and violence. Children as well as adults are used as drug runners.

It's common for gangs to have access to several addresses. They move quickly between vulnerable people's homes for just a few hours, a couple of days or sometimes longer. This helps gangs evade detection.

These gangs may use accommodation in rural areas, including serviced apartments, holiday lets, budget hotels and caravan parks.

Some vulnerable adults may be forced to leave their homes, making themselves homeless and leaving the gangs free to sell drugs in their absence.

What are the signs of cuckooing

Signs that 'cuckooing' may be going on at a property include:

- An increase in people entering and leaving
- An increase in cars or bikes outside
- Possible increase in anti-social behaviour
- Increasing litter outside
- Signs of drugs use
- Lack of healthcare visitors

What to do

If you have any information you can contact the independent crime-fighting charity Crime stoppers anonymously on 0800 555 111 or through their anonymous online form at: www.crimestoppers-uk.org. No personal details will be taken, information cannot be traced or recorded and you will not get to court.

You can also contact your local Police by calling 101 or your Housing Office if you have any concerns.

Forced Marriage

What is forced marriage

You have the right to choose who you marry, when you marry or if you marry at all.

Forced marriage is when you face physical pressure to marry (for example, threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if you're made to feel like you're bringing shame on your family).

Force marriage offences

Forced marriage is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

Forcing someone to marry can result in a sentence of up to 7 years in prison.

Forced marriage protection orders

You can ask the court for a forced marriage protection order.

Each order is unique, and is designed to protect you according to your individual circumstances. For example, the court may order someone to hand over your passport or reveal where you are.

In an emergency, an order can be made to protect you immediately.

Disobeying a forced marriage protection order can result in a sentence of up to 5 years in prison.

Forced marriage abroad

Contact the FMU if you think you're about to be taken abroad to get married against your will.

Contact the nearest British embassy if you're already abroad.

If someone you know is at risk

Contact the FMU if you know someone who's been taken abroad to be forced into marriage.

Give as many details as you can, for example:

- where the person has gone
- when they were due back
- when you last heard from them

The FMU will contact the relevant embassy.

If they're a British national, the embassy will try to contact the person and help them get back to the UK if that's what they want.

Support for victims

Read the handbook about being a survivor of forced marriage available at: <https://www.gov.uk/government/publications/survivors-handbook>.

It has details of organisations that can give you help and advice.

Get support if you're a victim of forced marriage in Scotland: <https://www.mygov.scot/forced-marriage/get-support/>

DISCLOSURE OF ABUSE.

Freshfield recognises that an abuse disclosure can occur within a general wellbeing conversation initiated by a member of staff (e.g. following a period of absence). It also acknowledges that an abuse disclosure can arise 'unprompted' in any situation and to any member of staff.

With regard to an abuse disclosure, all staff should follow the '**Five Rs**' guidance below:

2a. RECOGNISE.

NB If a 999 call is necessary e.g. due to serious head injuries, obviously phone 999.

If an abuse disclosure is being made to you, recognise it as such. Treat it as a truthful. Make it your priority above all other professional commitments that day.

2b. RESPOND.

Throughout the abuse disclosure, be aware of your own safety. Take appropriate action (e.g. cease conversation and seek assistance from colleague) if your safety is at risk.

- Listen
- Appear calm
- Maintain approachable body language
- If appropriate, establish whether others (e.g. siblings) could have been/are at risk
- Explain that you cannot keep information about abuse, harm or neglect confidential, and that the Wellbeing Manager will handle the information very sensitively
- Avoid criticising the alleged abuser (e.g. 'I think your Mum should feel ashamed')
- Avoid stating assumptions (e.g. 'I know your old boss will go to prison for this')
- Avoid leading questions (e.g. 'I bet your grandfather gave you the black eye, didn't he?'). These could jeopardise subsequent investigation/court proceedings
- Avoid investigating (e.g. 'I'll ask your aunt whether she saw anything when she picks you up'). This could jeopardise subsequent investigation/court proceedings
- Examples of NON-leading/NON-investigative questions (i.e. good practice) include 'I'd like to check if there's anything else that you want to explain' and 'I'll give you a few minutes to think about whether you've said everything relevant'

When the disclosure has finished, explain that:

- Freshfield priorities safety and wellbeing
- You are taking the information very seriously
- S/he has done the right thing in talking to you
- S/he will get feedback ASAP about which actions, if any, are being taken
- You will arrange a drink and some privacy/company for them, if appropriate

It is vital to avoid guarantees such as 'I'll stay involved every step of the way' and 'I promise you that everything will be alright now'. These statements are open to misinterpretation and could cause the complainant considerable distress in future weeks.

2c. REPORT.

Staff must report any abuse disclosure within two hours to a Director from Freshfield by phone. NB If a 999 call is necessary e.g. due to serious head injuries, obviously ring 999 first.

Do not contact the parent/carer unless advised to do so by a Director from Freshfield. Doing so could enhance the risk to the young person/vulnerable adult and/or jeopardise subsequent investigation/court proceedings.

If the disclosure happens out of normal working hours (08.30 till 17.30, Mon – Fri) and a Director is not available, contact the NSPCC on 0808 800 5000. Inform a Director from Freshfield by phone that you have done so first thing the next working day.

2d. RECORD.

If you can access the **ABUSE DISCLOSURE FORM** (section 3 of this Safeguarding Documentation), fill it in **in black pen** immediately.

If you cannot access the above form, instead make notes **on paper**. These notes should:

- Be handwritten in black pen
- Mention where disclosure took place and if anyone else was present (e.g. colleague)
- State name of complainant and, if different, name/s of alleged victim/s
- Include nature of alleged abuse: dates, times, names and locations where possible
- Mention all information given, even if it some might seem irrelevant
- Use complainant's own words, even if their language is offensive (e.g. sexually explicit/racist) or seems incorrect (e.g. 'I drove from London to Edinburgh in two hours')

After filling in the form above/writing notes on paper, **ensure that the documentation is:**

1. Signed, with your full name also printed clearly
2. Dated
3. Witnessed by a colleague (only if possible and appropriate)
4. Placed in a sealed envelope marked 'confidential'
5. Locked somewhere which is secure and accessible later that day/in the near future

2e. REFER.

Only a Director from Freshfield can refer abuse disclosures to external agencies/individuals (including Local Authority Designated Officers, Multi-Agency Safeguarding Hubs, Local Safeguarding Children Boards and mental health crisis services).

*NB the following **four safeguarding documents** are to be read in conjunction with each other:*

1. SAFEGUARDING POLICY STATEMENT
2. GUIDANCE ON RESPONDING TO SUSPICION/EVIDENCE/DISCLOSURE OF ABUSE
3. ABUSE DISCLOSURE FORM
4. SAFE WORKING PRACTICES

MASH Referrals

MASH provides triage and multi-agency assessment of safeguarding concerns - in respect of vulnerable children and adults. It brings together professionals from a range of agencies into an integrated multi-agency team.

MASH stands for multi-agency safeguarding hub which seeks to enable the sharing of information so risks to vulnerable children and adults can be identified at an early stage. It is a link between universal services such as schools and GPs and statutory services such as police and social care.

Speak to the Freshfield Safeguarding designated officer in the first instance (see contact details below). If a MASH referral is required the Safeguarding Officer will make contact with the relevant local authority MASH unit.

Freshfield Safeguarding designated officer is: Rachel Hayes, Lead Programme & Quality Coordinator.

Contact details: Mobile 07825683642.

Email: rachel@freshfieldstraining.com

3. ABUSE DISCLOSURE FORM

- COMPLETE IN BLACK PEN AFTER SPEAKING TO A DIRECTOR FROM FRESHFIELD
- AFTER COMPLETION, PLACE IN A SEALED ENVELOPE MARKED 'CONFIDENTIAL'
- LOCK ENVELOPE IN DRAWER (THAT IS SECURE AND ACCESSIBLE BY KEY)

DATE OF DISCLOSURE: TIME OF DISCLOSURE:

LOCATION OF DISCLOSURE:

YOUR NAME (I.E. STAFF MEMBER REPORTING DISCLOSURE):

YOUR JOB ROLE:

DETAILS OF COLLEAGUES/ADDITIONAL PERSONS PRESENT DURING DISCLOSURE:

.....

YOUR SIGNATURE:

ONLY IF ADVISED BY A DIRECTOR FROM FRESHFIELD - SIGNATURE AND NAME OF COLLEAGUE WHO WITNESSED THIS FORM:



NAME OF PERSON/S ABOUT WHOM DISCLOSURE WAS MADE:

.....

STATUS OF PERSON/S ABOVE (E.G. INTERVIEWEE, LEARNER, SIBLING OF LEARNER):

.....

TRAINING CENTRE, IF APPLICABLE:

COHORT (E.G. CDM), IF APPLICABLE:

DATE OF BIRTH: PHONE NUMBER:

HOME ADDRESS:

.....

NAME/PHONE NUMBER/RELATIONSHIP OF EMERGENCY CONTACT:

.....

.....

.....

IF DIFFERENT FROM ALLEGED VICTIM/S, NAME/DETAILS OF PERSON WHO MADE ABUSE DISCLOSURE:

.....

.....

.....

.....

ACCOUNT OF DISCLOSURE (CONTINUED OVERLEAF):

- STATE CONTEXT OF DISCLOSURE (E.G. LEARNER REVIEW)
- WHERE PROVIDED, GIVE DATES, TIMES, NAMES AND LOCATIONS
- IF KNOWN, MENTION WHETHER ALLEGED VICTIM LIVES WITH UNDER-18S
- MENTION ALL DETAILS, EVEN THOSE WHICH MIGHT SEEM IRRELEVANT
- USE COMPLAINANT'S OWN WORDS, EVEN IF LANGUAGE IS OFFENSIVE OR GRAMATICALLY INACCURATE

ACCOUNT OF DISCLOSURE CONTINUED. NB WRITE 'N/A' IF EXTRA LINES NOT USED.

If the disclosure happens out of hours (08.30 till 17.30, Mon – Fri) and a Freshfield Director could not be contacted, contact the NSPCC on 0808 800 5000. Inform a Freshfield Director by phone that you have done so first thing the next working day.

| |
|--|
| FRESHFIELD DIRECTOR FIRST CONTACTED ABOUT DISCLOSURE:..... |
| DATE AND TIME THAT ABOVE COLLEAGUE WAS CONTACTED: |
| |

*NB the following **four safeguarding documents** are to be read in conjunction with each other:*

1. SAFEGUARDING POLICY STATEMENT
2. GUIDANCE ON RESPONDING TO SUSPICION/EVIDENCE/DISCLOSURE OF ABUSE
3. ABUSE DISCLOSURE FORM
4. SAFE WORKING PRACTICES

4. SAFE WORKING PRACTICES

Definitions.

Young person: Anyone aged under 18.

Vulnerable adult: Anyone aged 18 or over in receipt of provision from a Social Care worker and/or assistance with certain types of:

- health care (including mental health care)
- financial management
- personal care
- general household matters
- conduct of own affairs

The above takes into account changes made to the 'Safeguarding Vulnerable Groups Act 2006' by the 'Protection of Freedoms Act 2012'. Freshfield respects learners' right to privacy; we encourage learners (e.g. at initial interview) to declare information about external support that they receive and to seek internal support. We acknowledge however that certain individuals might not do so. Freshfield thus recognises that it is not possible to identify definitively all the vulnerable adults within our 18+ cohort.

This guidance:

- Protects young people and vulnerable adults
- Allows staff to safeguard against malicious or misplaced abuse allegations
- Cannot cover all eventualities. Freshfield staff must take responsibility for avoiding actions which would **lead any reasonable person to question their motives and intent**

4a. REPORTING INCIDENTS/CONCERNS

Always inform a Director from Freshfield in the following situations:

- An **abuse disclosure** occurs, or you suspect/have evidence of abuse. In these cases, refer to sections 2 and 3 of this Safeguarding Documentation
- A learner seems very **distressed** and you cannot identify why
- **First aid** is performed on a learner or a learner is **restrained** in self-defence
- A learner is accidentally or deliberately **hurt** by a staff member/another learner
- A learner significantly **misunderstands or misinterprets** something that a staff member/another learner has said
- A learner/staff member is/appears to be **sexually aroused** by a learner/staff member

4b. PHOTOGRAPHING, VIDEOING AND FILMING

- **Written permission** must be obtained from learners (or, if under 18, their parent/carer) if photographs, videos, films etc are taken in the promotion of Freshfield activities. Learners (or, if under 18, their parent/carer) should be comprehensively informed of how and why any images of them might/will be used.

4c. WORKING ALONE WITH A YOUNG PERSON/VULNERABLE ADULT.

If working one-to-one with a young person/vulnerable adult is necessary within your job role:

- Use an area **visible to colleagues** (e.g. within open view on a building site or via CCTV). Inform a colleague where/why you are there. If working in a room, ensure that there is a glass-fronted door and/or that you leave the door partially open.
- Never meet him/her in a **non-workplace setting**, unless this has been approved by a Senior Manager from Freshfield.
- Plan ahead – find out at which periods employer sites/training centres have a **decreased staff presence** (e.g. due to annual leave).

4d. YOUNG PERSONS/VULNERABLE ADULTS WORKING WITHOUT SUPERVISION.

- Avoid allowing learners to **work unsupervised** where possible. If necessary, arrange contingency plans (e.g. ask a colleague to check learner safety at regular intervals, or supervise by CCTV).

4e. PROFESSIONAL BOUNDARIES WITH LEARNERS.

The following applies to current learners. Freshfield cannot stipulate how staff should interact with previous learners. However, Freshfield does advise keeping a professional distance from previous learners (especially from those who were under 18 whilst learners).

DO:

- DO tell your line manager if you have **personal relationships** with learners that existed prior to their applying for Freshfield (e.g. your son/girlfriend/tennis partner).
- DO be alert to the possibility of a learner misinterpreting your words and actions because s/he is **romantically/sexually attracted** to you, is **emotionally-dependent** on you, or views you as a **friend**.
- DO take advice if a learner seems to view you in a **romantic/sexual/emotionally-dependent** way, or as a **friend**.
- DO treat learners consistently, to **avoid displaying favouritism**.
- DO **maintain appropriate dress** (e.g. ensure that your underwear is not visible, and cover your stomach, back and upper thighs).
- DO **challenge learners who dress inappropriately** (lack of safety clothing, outfit which displays inappropriate body parts such as excessive cleavage, offensive logo etc).
- DO confirm that every room is empty of learners with a **visual check** if locking up (a learner could be asleep, have headphones in, have a hearing impairment etc).

DO NOT:

- DO NOT **transport learners** in a vehicle (your own or otherwise) unless agreed by a Director of Freshfield.
- DO NOT give your **personal mobile number or personal email address** to learners. If giving your phone number to learners, clarify that this is your work number.
- DO NOT give your **personal address** to learners.
- DO NOT engage with learners via **social media** (Facebook, Twitter etc) unless through a Freshfield profile which has been approved.
- DO NOT take part in **late night/weekend phone or email conversation** with learners as your actions could be misconstrued.
- DO NOT contact learners **outside the remit of your role** within the organisation.
- DO NOT initiate or pursue **friendships** or **romantic/sexual/emotionally-dependent relationships** with learners.
- DO NOT have **physical contact** such as hugging or back-slapping with learners. Physical contact that can be appropriate in context includes hand-shaking, administering first aid, and acting in self-defence.
- DO NOT condone learners touching anyone/themselves in a **sexual manner**.
- DO NOT do things of a **personal nature** for learners (e.g. accompanying them to buy clothing for an interview).
- DO NOT **lend** your own money to, or **borrow** from, learners. In an emergency, money-lending can be approved by a Director of Freshfield.
- DO NOT accept **personal gifts** from learners.
- DO NOT give gifts to learners.
- DO NOT use **unprofessional language** in the presence of learners (e.g. homophobic terms or sexual swear words).
- DO NOT condone **learners' use of unprofessional language** (e.g. homophobic terms or sexual swear words).
- DO NOT condone illegal/dangerous activity (speeding, cannabis use etc) e.g. by failing to challenge learner conversations in which such activity seems accepted.
- DO NOT **deliberately socialise** with learners in any out-of-hours setting. If you unexpectedly see a learner during non-working hours (e.g. in the supermarket) maintain a civil professional relationship - for example do not go for a coffee together. Take guidance concerning pre-existing social arrangements with learners that you wish to continue, e.g. you both play for the same cricket team.
- DO NOT overlook the presence of any learners **aged under 18 in the same bar/pub/club as you**. Explain to them that this puts you in an uncomfortable position due to your duty of care. Encourage them to leave, explaining that you will need to notify the bar staff if they do not.
- DO NOT stay in a bar/pub/club where you unexpectedly meet learners aged 18+, where practical. This is in order to **protect yourself** (e.g. from photos of you being displayed via social media without your consent).
- DO NOT discuss **inappropriate/over-personal aspects of your life** with learners, e.g. 'I'm hungover today' or 'I'm upset that my girlfriend doesn't show me affection'.

- DO NOT **damage your reputation** as a professional working with young people. Think carefully about which lifestyle information you place in the public eye (e.g. via Facebook, magazine articles, TV documentaries etc). Be equally mindful of how friends, relatives etc portray you in the public eye.
- DO NOT condone non-constructive and negative comments made by learners **about a colleague** (e.g. 'I hate her haircut').

*NB the following **four safeguarding documents** are to be read in conjunction with each other:*

1. SAFEGUARDING POLICY STATEMENT
2. GUIDANCE ON RESPONDING TO SUSPICION/EVIDENCE/DISCLOSURE OF ABUSE
3. ABUSE DISCLOSURE FORM
4. SAFE WORKING PRACTICES

Further Information

National Society for the Prevention of Cruelty to Children (NSPCC)

FGM Helpline
0800 028 3550
fgmhelp@nspcc.org.uk

Home Office FGM Unit

FGMEnquiries@homeoffice.gsi.gov.uk

Metropolitan Police

Child Abuse Investigation
Command/Project Azure
020 7161 2888

Foundation for Women's Health

Research & Development (FORWARD)
www.forwarduk.org.uk
020 8960 4000

Childline

www.childline.org.uk
0800 1111 (24 hr free helpline for children)
If you are abroad and require help or advice please call the Foreign and Commonwealth Office on +44 (0) 20 7008 1500.