



Coventry & Warwickshire
Chamber of Commerce
Training
Training | Skills | Growth

Safeguarding Young People & Vulnerable Adults Policy

C&W Chamber Training

“Putting People First”

Policy Statement

C&W Chamber Training (CWCT) has a statutory and moral duty of care to safeguard and promote the welfare of all adults in particular situations who may be vulnerable and young people. By young people, we mean those under the age of 18, whilst also recognising that some adults are also vulnerable to abuse, those defined in the Safeguarding Vulnerable Groups Act 2006 as receiving support because they have physical or mental health disabilities. This policy will ensure the safety and protection of all adults in particular situations who may be vulnerable and young people in learning with C&W Chamber Training.

In simple terms, we need to ensure we work effectively together to protect adults in particular situations who may be vulnerable and young people involved with C&W Chamber Training - a zero tolerance of abuse and other harmful behaviours. We will ensure that employers taking on young people and adults in particular situations who may be vulnerable understand the safeguards they need to put into place.

We are committed to ensuring that C&W Chamber Training:

- Prevent unsuitable people working with learners
- Identifying learners who are at risk of and/or are likely to suffer significant harm, and take appropriate action to make sure they keep safe at work and at CWCT
- Promote safe practice and challenge poor and unsafe practice
- Make necessary referrals to the Independent Safeguarding Authority
- Provide a safe environment for young people and vulnerable adults to learn in

C&W Chamber Training recognises there are 2 main aspects to safeguarding and promoting welfare of young people and adults in particular situations who may be vulnerable. These are minimising risks and taking all appropriate actions to address concerns and actively promoting the safe learner. We will help young people and adults in particular situations who may be vulnerable to stay safe, enjoy and achieve and make a positive contribution to the world around them.

We will refer concerns that a young person or adults in particular situations who may be vulnerable to appropriate agencies. All staff working with young people and adults in particular situations who may be vulnerable will be made aware of this policy and its contents. Adequate training will take place to familiarise staff with protection issues.

This policy is divided into fourteen sections:

1. Recruitment and Selection of staff
2. Code of Practice
3. Dealing with Disclosure
4. Guidelines for Reporting
5. Recording
6. Designated Protection Person and signature
7. Duties of the designated Protection Person
8. Senior Staff Member
9. Dealing with Allegations Against Members of Staff
10. Enquiries and Investigations
11. Suspension of Staff
12. Disciplinary Investigation
13. Definitions of abuse
14. Directory of agencies who can help

1. Introduction

C&W Chamber Training aims to adopt the highest possible standards and take all reasonable steps in relation to the safety and welfare of children, young people and adults in particular situations who may be vulnerable.

This policy applies to all staff, learners and volunteers who may be working with children (i.e. those aged under 16), young persons (i.e. those aged 16 to 18) and vulnerable adults (i.e. as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006). Through this policy, C&W Chamber Training is seeking to provide assurances to staff, learners, volunteers and visitors that, through its implementation, we will protect children, young people and vulnerable adults and to keep them safe from harm when in contact with C&W Chamber Training.

2. Aims and Objectives

C&W Chamber Training wishes to ensure that it maintains the highest possible standards to meet its social, moral and legal responsibilities to protect and safeguard the welfare of children, young people and adults in particular situations who may be vulnerable with whom C&W Chamber Training's work brings it into contact.

The aim of this policy is to highlight the areas that form the basis of C&W Chamber Training's approach to safeguarding the well being of children, young people and adults in particular situations who may be vulnerable.

3. Recruitment and Selection of Staff

C&W Chamber Training adopts recruitment and selection procedures that help to deter, reject or identify people who are unsuitable to work with young learners and vulnerable adults. Recruitment information will explicitly state our commitment to safeguarding and promoting the welfare of learners and the need for the successful applicant to have an enhanced DBS disclosure.

The personal qualities, qualifications and experiences needed for the successful applicant are provided in the applicants' job pack. The Application form will obtain a common set of core data which must be fully completed and include contact details of at least two referees.

Shortlisted candidates will be invited for interview and references obtained. The interview will assess the merits of each candidate against the job requirements and explore their suitability to work with young people and vulnerable adults.

An offer of appointment will be made subject to pre-appointment checks. The DBS check will be completed upon take up of employment. Individuals will not be permitted to work along with learners without a DBS Disclosure completed by C&W Chamber Training. Evidence of identity will be required such as a passport or a driving licence with a photograph.

Pre-appointment checks include references (character and where appropriate professional), identity, UK resident/right to work in UK, DBS enhanced disclosure, overseas criminal record check where necessary, qualifications (where appropriate) and previous employment history.

4. Staff Training

Staff who works with learners, particularly those under the age of 18 and adults in particular situations who may be vulnerable as well as those who access personal data will undertake Safeguarding training to at least level 1. The Designated Protection Person will be trained to level 2.

All staff are reminded about safeguarding and protection arrangements throughout the year and are encouraged to report any concerns they may have about a learner's welfare.

Guidance will be given to staff in the code of practice and by regular reminders in staff meetings and other briefings about how to avoid putting themselves at risk, for example from situations in which they may be the subject of allegations. This includes guidance for staff travelling with pupils or taking educational visits, as well as general guidance on the professional use of language, comments about appearance or clothing and appropriate electronic communication with learners

Staff Training in Safeguarding Plan:

New Staff

New staff joining C&W will undertake Safeguarding training appropriate to their role during their induction period. This will consist of a workshop where they will gain a strong grasp of safeguarding and safer recruitment.

Designated Protection Person

The Designated Protection Person has undertaken Facilitator training to enable them to deliver safeguarding training to wider C&W Chamber Training's staff on an initial and ongoing basis.

Existing Staff

Existing staff are trained by C&W Chamber Training's Designated Protection Person.

Members of the Board of Directors will receive suitable training in safeguarding.

5. Equality of Opportunity

Learning should promote the full and active participation of all individuals. There needs to be acceptable and unacceptable boundaries that encourage challenging discrimination, perceptions and stereotypes without threat. Learners should be able to:

- Be safe
- Feel protected
- Allowed to express themselves
- Be respected and have respect

6. Safe Use of ICT and the Internet

The Internet offers a vital resource for learners in terms of learning resources and for communication networks across the world. However it also carries inherent risks where information is being shared adding a further dimension to the degree and nature of the risks to young people and vulnerable adults. Mobile phones increase opportunities for pupils to communicate and access web sites and other Internet services unsupervised

7. Bullying and Technology

The use of the Internet and other modern technologies as a bullying tool between people is becoming increasingly common and can be extremely damaging to the victim.

Any concerns about a learner's use of IT, photographs, mobile phones or text messages should be reported to the appropriate named Designated Protection Person.

Any concerns about the use of technology by any member of staff or volunteer should be reported to the Executive Director and the appropriate named Designated Protection Person.

8. Counter Terrorism

In respect of safeguarding individuals from radicalisation, C&W works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support through the Channel Scheme for learners, aiming to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- The individual becomes increasingly intolerant of more moderate views
- They become withdrawn and focused on one ideology
- The individual expresses a desire/intent to take part in or support extremist activity
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups

9. Code of Practice

The following code of practice applies to all C&W staff working with children, young people or adults in particular situations who may be vulnerable:

- Always work in an open environment avoiding private or unobserved situations and encouraging open communication.
- Treat everyone as individuals with equal concern, respecting their background and culture.
- Always put the welfare of each person first.
- Maintain a safe and appropriate distance from each person, including no physical contact without the person's permission, whilst maintaining supervision.
- Do not take a learner alone in a car on journeys, however short. If this is unavoidable, ensure you tell someone else where you are going, what you are doing and why.
- Do not speak inappropriately to a learner *i.e.* do not use bad language or sexually suggestive language.
- Avoid unnecessary physical contact.
- Unless circumstances make it impossible to comply, do not take a child or vulnerable adult to the toilet unless either (a) another adult is present or (b) another adult is aware
- If you find you are in a situation where you are alone with a child, young person or vulnerable adult, wherever practicable make sure that others can clearly observe you.
- Avoid close personal relationships with a child, young person or vulnerable adult in relation to whom you are in a position of trust.
- Do not make suggestive or inappropriate remarks to or about a child, young person or vulnerable adult, even in fun, as this could be misinterpreted.
- If a child, young person or vulnerable adult accuses a student or member of staff of abuse or inappropriate behavior, you should report this immediately to the relevant person.
- The duty to report applies equally to complaints or accusations of historic, and not just recent, abuse/inappropriate behavior.
- Participate in the training available to you to support you in your work with children, young people and vulnerable adults.
- Good practice includes valuing and respecting children, young people and vulnerable adults as individuals, and the adult modelling of appropriate conduct – which would exclude bullying, aggressive behavior and discrimination in any form.

Confidentiality and information sharing

- Colleagues will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, colleagues will seek advice from their line manager or a member of senior management, as required.
- The line manager or designated Protection Person will disclose any information about an adult or young person to other members of staff on a need to know basis only.
- All colleagues must be aware that information an adult or young person discloses regarding abuse of themselves or another person must be shared as appropriate, and cannot be kept secret.
- Information will be shared on a *need to know* basis – taking account of the best interests of the adult or young person.
- Any exchange or disclosure of information must be in accordance with the Data Protection Act 1998 and the Human Rights Act 1998 and the Freedom of Information Act 2000.
- C&W Chamber Training recognise that confidentiality must be designed to safeguard the best interests of the abused person and must not be confused with protecting the management interest of an organisation.

10. Dealing with Disclosure of Abuse

You may become aware of potential abuse in 2 main ways:

- a. you may observe signs in a learner that lead you to suspect that they have been physically, emotionally or sexually abused or suffer severe neglect or are becoming radicalised; or in addition in the case of a vulnerable adult, they may be experiencing financial, discriminatory or institutional abuse.
- b. the learner themselves may disclose to you that they have been abused.

If you suspect or are told that an adult or young person is being abused:

- Stay calm.
- Listen carefully to what is said.
- Allow them to speak but be very careful not to say anything that may suggest or prompt a particular answer.
- Accept at face value what they say.
- Reassure them that you are listening carefully to them but refrain from promising to “keep a secret”. Make it clear that you may have to tell someone else who can help to sort things out.
- Reassure them that they have done the right thing in telling you.
- Tell the adult or young person what you will do next and with whom the information will be shared.
- Make a detailed written note of what was said or seen at the time. Note the date, time, any names mentioned, to whom you have given the information and ensure that the record is signed and dated.
- Pass on your concerns to one of C&W Chamber Training’s designated Protection Persons who will deal with the matter as in their duties listed in this Policy.

Staff should not investigate concerns or allegations themselves, but should report them immediately to the Designated Person.

11. Guidelines for reporting

Remember that you are not responsible for deciding whether abuse has occurred. That is a task for the professional agencies, following a referral from C&W Chamber Training's designated Protection Person.

Any concerns regarding allegations of abuse must, in the first instance, be reported to your designated Protection Person. A form will be completed as soon as possible after the event, detailing the concern or incident. All records will be kept confidentially. The designated Protection Person will then decide whether to discuss the concern/allegation with Social Services or the police, and if appropriate, make a direct referral.

12. Recording

Allegations or suspicions of abuse should be recorded on the appropriate form (attached). A complaints sheet is available for colleagues to complete if they feel that an individual is not conforming to the policy.

If you have any concerns or suspicions that C&W Chamber Training's Safeguarding Young People and Vulnerable Adults Policy is being ignored please contact:

Designated Protection Person

C&W Chamber Training, Commerce House, St. Nicholas Street, Coventry, CV1 4FD

Telephone No: 024 7623 1122

13. Designated Protection Person appointed by C&W Chamber Training is:

Name:	Sarah Williams
Location:	Commerce House, St. Nicholas Street, Coventry, CV1 4FD
Telephone No:	024 7623 1122

14. Duties of the Designated Protection Person

- To familiarise themselves with C&W Chamber Training's Safeguarding Young People and Vulnerable Adults Policy and ensure it is reviewed on an annual basis.
- To ensure that all colleagues are aware of C&W Chamber Training's Safeguarding Young People and Vulnerable Adults Policy and where to access the information.
- To ensure the Policy is adhered to and raise any concerns in this respect with the Executive Director.
- To receive any concerns about any C&W Chamber Training learners, adults or young people employed or on work placement.
- To respond to those concerns by discussing the matter with whoever has raised the concern, notifying the Executive Director and agreeing an appropriate response to the situation. Depending on the nature of the concern, the response may range from simply keeping a record of the concern to immediately contacting the police or local social services.
- To keep confidential records of any concerns received and the response.
- To attend any training events appropriate to the position.

- To report to the senior member of staff with lead responsibility.
- To know how to make an appropriate referral.
- To provide advice and support to other staff on issues relating to child protection.
- To have particular responsibility to be available to listen to young people and vulnerable adults learning through C&W Chamber Training.
- To deal with individual cases, including attending case conferences and review meetings
- Has received training in child protection issues and inter-agency working, and will receive refresher training at least every 2 years.

15. Senior staff member with lead responsibility is:

Name: Jan Ryan
 Location: Commerce House, St.Nicholas Street, Coventry, CV1 4FD
 Telephone No: 024 7623 1122

This person is a member of the management team. She has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of young people and adults in particular situations who may be vulnerable and the promotion of a safe environment within C&W Chamber Training.

16. Reporting and Dealing with Allegations against Members of Staff

Because of their frequent contact with young people and adults in particular situations who may be vulnerable, staff may have allegations made against them. C&W Chamber Training recognises that an allegation made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true.

C&W Chamber Training recognises that the welfare of the individual is of paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career.

A member of staff who receives an allegation about another member of staff should follow the guidelines in Section 3 for dealing with disclosure.

The allegation should be reported immediately to the Executive Director, unless the Executive Director is the person against whom the allegation is made, in which case the report should be made to the Operations Director. The Executive Director (or Operations Director person if the allegation is against the Executive Director) should obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Executive Director (or Operations Director). Information about times, dates, locations and names of potential witnesses should be recorded.

The Executive Director (or designated person) should make an initial assessment of the allegation, consulting with the Senior Staff Member with Lead Responsibility. Where the allegation is considered to be either a potential criminal act or indicates that the individual has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the appropriate authorities.

The Executive Director will not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other outcomes may be:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the individual. The matter should be addressed in accordance with C&W Chamber Training's disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

17. Enquiries and Investigations

C&W Chamber Training's shall hold in abeyance our own internal enquiries while the formal third party agencies investigations proceed. Any internal enquiries shall conform with the existing staff disciplinary procedures.

Confidentiality will be maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Executive Director (or designated person) will consult with the police or other investigating agency, particularly in relation to timing and content of the information to be provided, and shall inform relevant parties regarding the investigation and the likely process.

18. Suspension of Staff

Suspension will not be automatic. In respect of staff other than the Executive Director, suspension can only be carried out by the Executive Director. Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Alternatives may include change of, or withdrawal from, specified duties.

The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. The interview will not be a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

If the Executive Director considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day. The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

19. The Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with the current staff disciplinary procedures.

20. Definitions of abuse

C&W Chamber Training recognises the following definition of abuse:

- A violation of an individual's human and civil rights by any other person or persons.
- When a person's dignity is violated by someone else, often where there is an expectation of care or trust, which causes harm to that person.
- There are many kinds of abuse. The following list gives an indication of the categories of abuse and some examples (this list is not exhaustive):

Physical Abuse - hitting, slapping, pushing, kicking, misuse of medication, restraint, inappropriate sanctions.

Neglect - persistent or severe failure to meet basic physical and/or psychological needs, likely to result in serious impairment of health or development. For example, failure to provide adequate clothing to protect from physical harm or danger.

Emotional Abuse - rape and sexual assault or sexual acts to which the vulnerable adult or young person has not consented, could not consent or was pressured into consenting.

Psychological - emotional abuse, threats of harm, threats of abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse.

Financial or material – theft, fraud, exploitation, pressure in connection with financial transactions, the misuse or misappropriation of property, possessions.

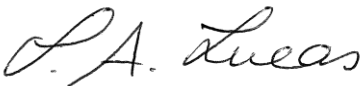
Radicalisation - where individuals or groups adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice.

21. Directory of Agencies who can help

Police:	0845 113 5000
Out of hours Emergency Duty Team (Social Services):	024 7683 2222
Children and Families:	Please see your local authority. Ask to speak to someone about a “child protection concern”
NSPCC	0808 800 5000 (free 24 hour help line)
Child Line	0800 1111 (free 24 hour help line) (Gives comfort, advice and protection to children and young people who are worried about any problems)
Eating Disorders Association	0845 634 7650 Open 4pm to 6.30pm, Monday to Friday (Calls charged at local rate but they can call you back)
Cruse Bereavement Centre	0808 808 1677 (free) Open 9.30am to 5pm, Monday to Friday (Gives support, information and advice to people who have been affected by a death)
Kidscape	www.kidscape.org.uk (Gives practical advice on bullying and keeping safe)
National Drugs Help Line	0800 77 66 00 (free 24 hour help line) (Free confidential advice and help to anyone affected by drugs)
National AIDS Help Line	0800 567 123 (free 24 hour help line) (Confidential advice and information to anyone concerned about HIV and AIDS)
Saneline	0845 767 8000 Open 12 noon to 2am every day (Provides listening, crisis support and useful information to anyone coping with mental health difficulties, including those of friends or relatives)
Brook	0800 0185 023 (free) Open 9am – 5pm Monday to Thursday Open 9am – 4pm on Fridays (Free, confidential sexual advice, contraception, pregnancy testing and counselling for young people)
Who Cares? Trust Link line	0500 564570 (free) Open 3.30pm to 6pm Monday, Wednesday, Friday (Confidential support and information to young people who are in or have left the care system)

Message Home Help Line	0800 700 740 (free 24 hour help line) (For anyone who has left home or run away to send a message to their family or carer and get confidential help and advice)
NCH	www.itsnotyourfault.org (Supports and informs young people whose parents are splitting up)
NYAD-The Young Person's Safety Net	0800 616 101 (free) Open 9.30am – 9.30pm weekdays Open 2pm – 8pm weekends (Gives free independent advice and information. They can arrange for an advocate to help young people get their wishes and feelings listened to and to help them get their own views across)
Anti-terrorist hotline	0800 789 321
Prevent Co-ordinator	0121 251 0239 prevent@west-midlands.pnn.police.uk

This policy will be reviewed annually by C&W Chamber Training.

Signed: 
(Executive Director)

Date: 1st February 2017

Related policies:

- Equality and Diversity
- Lone Worker
- Health and Safety
- Bullying and Harassment

APPENDIX A

Guidance on receiving a disclosure

RECEIVE

- React calmly; be aware of your non verbal messages.
- If you don't understand their communication method, reassure them, and find someone who can.
- Don't interrogate them, observe and listen, use active listening techniques.
- Don't stop someone who is freely recalling significant events.
- Keep responses short, simple, slow, quiet and gentle.
- Don't end the conversation abruptly.

REASSURE

- Tell them they are not to blame; and have done the right thing by telling you.
- Tell them what will happen next; be honest about what you can and can't do.
- Do not promise confidentiality; say to them, 'Some things are so important I might have to tell them to somebody else.'

REACT

- Explain what you have to do next and whom you have to tell.
- Ensure the immediate safety of you or the vulnerable adult.
- Inform the designated Protection Person, **immediately**.

**“Mistreatment and abuse is never acceptable
and ignoring abuse is not an option”**

RECORD OF WORRIES OR SUSPICIONS CONCERNING THE CONTRAVENTION OF:

**C&W CHAMBER TRAINING SAFEGUARDING YOUNG PEOPLE
& VULNERABLE ADULTS POLICY**

Please record the following details:

Name of Adult/ Young Person: _____

Home Address: _____

Tel No: _____

Is the person making the report expressing their own concerns or passing on those of someone else? If so record details:

What has prompted the concern – include dates/ times of any specific incidents.

Are there any physical signs/behavioural signs/ indirect signs?

Has anybody been alleged to be the abuser? If so record details:

Has anyone else been consulted e.g. Manager, employer or colleague? If so record details:

Signature: _____ Name: _____
Position _____ Date: _____

Follow-up action agreed/taken	By Whom	When