



All talents, certified.



Safeguarding Policy

Child and Vulnerable Adult Protection Policy and Procedure

June 2020

Version1.1

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1 Introduction

This policy applies to all PeopleCert staff and representatives who work for or on behalf of PeopleCert. The purpose of the policy is to ensure that all PeopleCert staff and representatives are aware of the need to protect children and vulnerable adults who are at risk and provide them with guidance on what to do if a concern is raised or risk identified.

This policy sets out our approach to safeguarding children, young people and vulnerable adults.

1.1 Review arrangements

We will review this document annually, however, a review will be commissioned earlier should an issue arise that requires an earlier review.

1.2 Purpose

The purpose of this document is to:

- Safeguard and promote the wellbeing of the children and vulnerable adults with whom PeopleCert works.
- Provide all employees with guidance on how they should behave if they suspect that a child or vulnerable adult may be experiencing or be at risk from abuse or harm.
- Guide employees on how to respond to - and report – concerns.

1.3 Who is affected by this Policy?

This policy applies to all paid employees, seconded staff, management, Board members, contracted, and unpaid staff working on behalf of PeopleCert in any capacity and in any setting. This policy relates to all children from unborn up to 18 years of age and includes children with whom PeopleCert has direct or indirect contact with. This policy also relates to vulnerable adults who need to be safeguarded from harm.

1.4 Definitions

Safeguarding is defined in UK Government Guidance 'Working together to safeguard children, 2018' as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

A child is defined as a person who has not yet reached their 18th birthday; the definition also includes unborn children. Children is a term which shall be used, for the purposes of this document, to encompass both children and young people.

Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if he/she:

- Has a learning or physical disability.
- Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs.
- Has a reduction in physical or mental capacity.
- Is in receipt of any form of healthcare.
- Is detained in custody.
- Is receiving community services because of age, health or disability.

- Is living in sheltered accommodation or residential care home.
- Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.

2 Legal Framework

Everyone has a right to be safeguarded from abuse or neglect. In the UK a legislative framework is in place in place to safeguard children and vulnerable adults through The Children Act 1989 (as amended by section 53 of the Children Act 2004) and the Safeguarding Vulnerable Groups Act 2006. Further guidance that sets out the requirements and expectations on professionals to work together to effectively safeguard children include: Working Together to Safeguard Children (2018), Safeguarding Disabled Children: Practice Guidance (2009) and What to do if you're worried a child is being abused (Department for Education, 2015). Even in cases where PeopleCert does not have a statutory duty to comply with the key arrangements listed in various legislation and guidance, it aims to have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children and vulnerable adults.

The PeopleCert Safeguarding policy is supported by the following guidance and legislations:

- Children Act (2004).
- The Human Rights Act (1998).
- Working together to safeguard children (2018).
- Safeguarding Vulnerable Groups Act (2006).

3 PeopleCert's Approach to Safeguarding

From time-to-time, PeopleCert may work directly with children or vulnerable adults. PeopleCert also works with educational organisations who may work directly with children or vulnerable adults. This means that PeopleCert staff or representatives (depending on their role) may be required to have direct or unsupervised contact with children or vulnerable adults whilst carrying out their normal duties, and, be in a position where interactions are possible.

For this reason, PeopleCert is committed to providing all its staff and representatives with information and guidance to allow them to:

- Understand that everyone who works with children and vulnerable adults have a responsibility for keeping them safe, and everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- Have an awareness of safeguarding and the risks or signs of abuse which may indicate that concerns need to be reported.
- Understand what action to take if they notice safeguarding risks or signs of abuse, or they are approached by another party who has safeguarding concerns.
- Appropriately manage situations where direct, unsupervised contact with children or vulnerable adults may occur.
- Follow the Safeguarding Code of Practice when in direct contact with children and/or vulnerable adults.

4 General Principles

Safeguarding relates to the action taken to promote the welfare of children and vulnerable adults and to protect them from harm. All staff should have a basic awareness of safeguarding issues. This includes:

- Being alert to the possibility of abuse and neglect.

- Having enough knowledge to recognise an abusive, or potentially abusive, event or set of circumstances.
- Knowing who in the organisation to raise concerns with.
- Being competent to take the appropriate immediate or emergency action.

If any member of staff has any concerns about a child or vulnerable adult, they must alert PeopleCert's Designated Safeguarding Officer (DSO) immediately. This role will be assumed by our Human Resources Manager. If the DSO agrees there is grounds for concern, they must take appropriate action to safeguard the child or vulnerable adult. This may include contacting the relevant local authority social care service or the local police child abuse investigation team.

If a child or vulnerable adult is in immediate danger, the member of staff who first becomes aware of the danger should contact the police.

The above may include concerns about a member of staff, a suspicion that a child or vulnerable adult is being abused or neglected, or a suspicion that an activity is taking place that could place a person at risk.

In any situation where there is a suspicion of abuse, the welfare needs of the child or vulnerable adult must come first, even where there may be a conflict of interest (e.g. where the suspected perpetrator may be a member of staff).

5 What Constitutes Abuse?

Abuse is a deliberate act of ill-treatment that can harm or is likely to harm a person's safety, wellbeing and development. Abuse can be physical, sexual or emotional. Abuse may not, however, fall easily into these categories and staff/associates are not expected to be experts in the field. Neglect also constitutes abuse but can be defined as failing to provide or secure a child or vulnerable adult with the basic needs required for physical safety and wellbeing. PeopleCert recognises that a person's welfare is paramount and that all children and vulnerable adults - regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity - have the right to protection from all types of harm and abuse.

5.1 Categories of abuse

All PeopleCert staff and representatives who may be required to work at or visit sites and centres where children and vulnerable adults may be, should maintain an ongoing awareness of abuse and any signs that may indicate a safeguarding issue.

Children and vulnerable adults can experience abuse in a number of ways. Forms of abuse that may affect children and vulnerable adults include:

- Abuse of trust.
- Child sexual exploitation.
- Child trafficking.
- Discriminatory abuse.
- Domestic violence or abuse.
- Emotional Abuse.
- Female Genital Mutilation (FGM).
- Financial or material abuse.
- Grooming.
- Harmful sexual behaviour.
- Modern slavery.
- Neglect.
- Online abuse.
- Organisational or institutional abuse.

- Physical abuse.
- Psychological or emotional abuse.
- Radicalisation of children or vulnerable adults.
- Self-neglect.
- Sexual abuse.

These categories can overlap, and an abused child or adult often suffers more than one type of abuse. Disabled children and young people are particularly vulnerable to abuse in any form. Safeguards for disabled children are essentially the same as for non-disabled children. Staff must maintain high standards of practice, remain vigilant to the possibility of a child being abused and minimise situations of risk. Where there are concerns about the welfare of a disabled child, they should be acted on in accordance with the procedures set out in this policy. The same thresholds for action apply.

6 Responding to a Child's or Vulnerable Adult's Disclosure of Abuse

The staff member's role is not to investigate or verify the situation, but rather to make the report and set in motion the process of getting help for the child.

Support of the child or vulnerable adult is important. In order to do this, the following recommendations are provided:

- Reassure the child/vulnerable adult that it is okay to speak about what has happened.
- Staff may ask the child/vulnerable adult if s/he would prefer to speak to a social worker.
- Tell the child/vulnerable adult what to expect. If you don't know, say so, but let them know s/he can be supported by you.
- Project a calm, understanding and supportive attitude.
- Avoid having the child/vulnerable adult repeat their explanation to different staff.
- Let the child/vulnerable adult know that you must tell the DSO to get help. Explain that you will have to tell another person because s/he is at risk.
 - For example, you might say: "If you tell me something that makes me feel that you are unsafe or at risk in any way, then I will need to tell someone else".
- Reassure the child/vulnerable adult that it is not their fault.
- Make clear, detailed notes of the conversation.
- Respect the child's/vulnerable adult's privacy by not discussing the situation out of work.

In addition:

- It is important to understand the importance of early reporting.
- A member of staff who reports in good faith is protected from civil liability.
- Reporting a disclosure is a request for an investigation.

General Advice Checklist	
DO	DON'T
Be accessible	React strongly (e.g. "that's terrible")
Listen carefully	Jump to conclusions
Take it seriously	Speculate or accuse anyone
Reassure them they were right to tell	Tell them you will keep their secret
Say what will happen next	Ask leading questions
Consult immediately with the DSO	Make promises you cannot keep
Make a careful record of the communication	Stop them from speaking freely

7 Procedures for Safeguarding Children and Vulnerable Adults

7.1 Organisation duties and responsibilities

- Raise awareness of the need to protect children and vulnerable adults and reduce risks to them.
- Ensure that staff in contact with children and vulnerable adults have the requisite knowledge, skill and qualifications to carry out their jobs safely and effectively.
- Ensure safe practice when working in partnership with other organisations; in particular, that they have in place adequate safeguarding arrangements, including appropriate policies and mechanisms to provide assurance on compliance.
- Maintain an organisation that is safe for all staff, children and vulnerable adults and an environment where poor practice is challenged.
- Ensure that when abuse is suspected or disclosed, it is clear what action must be taken.
- Ensure that the Chief Executive Officer, members of the Board, and the Designated Safeguarding Officer (DSO) are accountable for the effective implementation of this policy.
- Ensure that all staff receive a copy of safeguarding policies, are trained in their meaning and application and understand their responsibilities.

These procedures are set within the wider context of PeopleCert's organisational policy and practice.

7.2 Responsibilities of the Designated Safeguarding Officer (DSO)

It is our Human Resources Manager who will assume the role of Designated Safeguarding Officer (DSO). The DSO is responsible for ensuring that safeguarding is given high priority within the company. Specific responsibilities include:

- Providing support and advice to all managers and staff on safeguarding matters related to children and vulnerable adults.
- Ensuring that all members of staff receive training on child protection and safeguarding as part of their induction, and on an ongoing basis where required.
- Managing referrals/cases reported and working with Senior Management to ensure resolutions.
- Carrying out referrals to the relevant local authority and social care services where abuse of a child or vulnerable adult is reported or suspected.
- Referring the matter to the appropriate local authorities where a member of staff is suspected of abuse.
- Maintaining an overview of safeguarding issues and monitoring the implementation of this policy, in conjunction with the Head of Learning & Development.

The DSO has responsibility for deciding whether to refer any reported matters onto the police or to the local authority social care service. Where possible, referrals should be made on the same working day and certainly within 24 hours. It is the responsibility of the DSO to decide whether the parents/carers (if applicable) of the child or young person should be informed of the referral.

7.3 Responsibilities of the Head of Learning & Development

- Supporting the DSO in the above tasks.
- Auditing the operation of the policy and procedures.
- Implementing a training strategy for employees.
- Ensuring that the policy and procedures are implemented throughout the organisation.
- Ensuring that the organisation's safeguarding policy is reviewed annually.

7.4 Responsibilities of Senior Management and the Board of Directors (BoD)

To comply with their legal duties, senior management and the BoD must react responsibly to reports of safeguarding risks and incidents of abuse. They must also take steps to make sure all staff know how to deal with these.

7.5 Responsibilities of Line Managers

Individual line managers are responsible for ensuring staff comply with the expectations set out within this policy. Specific responsibilities include:

- Being the point of contact regarding any staff concerns before official reporting to the DSO (e.g. staff who wish to discuss concerns with their line manager before approaching the DSO must be guided by the line manager to preserve the anonymity of the child/vulnerable adult where required).
- Ensuring that all employees and associates are aware of this policy and associated procedures.
- Reporting all concerns to the DSO.
- Providing advice and support to employees reporting disclosures or concerns.
- Working with the DSO to resolve issues.

7.6 Employee Responsibilities

All PeopleCert staff have a responsibility to ensure the safety of children and vulnerable adults with whom they work. It is the responsibility of staff to promote good practice, manage and minimise potential risks. All staff – including freelance staff and associates - must be aware of the requirements within this policy and associated procedures.

Action to safeguard: PeopleCert staff have no powers to investigate abuse. Nonetheless, all staff have a duty to safeguard and promote the welfare of children/vulnerable adults and a responsibility to work closely and cooperatively with other agencies in order to achieve this. Staff may have a role as referrers, witnesses or supporters in safeguarding processes.

If a member of staff suspects that a child/vulnerable adult is being harmed by experiencing, or already has experienced, abuse or neglect and/or is likely to suffer harm in the future, they must talk to the DSO. The DSO will agree next steps including making any necessary referrals.

If anyone other than the DSO makes a referral, they should inform the DSO as soon as possible.

It is not the responsibility of PeopleCert to decide whether or not abuse has taken place. It is the responsibility of staff to act if there is cause for concern, in order that the appropriate agencies can investigate and take any action necessary to protect the young and/or vulnerable adult.

If a member of staff is concerned that a child is in immediate danger, or requires immediate medical treatment, they should call the police and/or emergency medical services immediately.

8 Staff Behaviour

8.1 Code of Practice

PeopleCert staff working with children and/or vulnerable adults are required to undergo awareness training.

Staff should not:

- Meet with a child or vulnerable adult on their own.

- Ask overly personal questions, including those about age or appearance (unless specifically related to a work project, in which case it must be documented).
- Send/give out material that could be considered offensive, which includes material on social media sites.
- Suggest or imply a personal relationship could develop.
- Take an aggressive or bullying tone.
- Have physical contact.
- Offer or accept personal gifts.
- Travel alone with a young and/or vulnerable person.

8.2 Website/Online Safety

Any project that provides service users with direct access to the Internet must have protocols in place to ensure safe use. The Internet is a significant tool in the distribution of indecent photographs and some adults use the Internet to try to establish contact with young and/or vulnerable people to “groom” them for inappropriate or abusive relationships. PeopleCert would consider staff involvement in such activities as gross misconduct, which could ultimately lead to dismissal and referral for police investigation.

8.3 Presence on Websites and Social Media

Staff should take care when communicating with others online, particularly when identifying themselves as PeopleCert staff members and when in contact with children and vulnerable adults.

8.4 PeopleCert Staff Obtaining and Accessing Inappropriate Text and Images

Many websites contain offensive, obscene or indecent material such as:

- Sexually explicit images and related material.
- Advocating illegal activities.
- Advocating intolerance of others.

Staff members, authorised to use the Internet, must not download pornographic or other unsuitable material on to PeopleCert machines or distribute such material to others. The company would consider this gross misconduct which could ultimately lead to dismissal and referral for police investigation.

In addition, users must not place any material on to the Internet that would be considered inappropriate, offensive or disrespectful of others. Disciplinary action will be taken against staff that breach this policy.

Where this is done inadvertently, the user must escape from the website and/or delete the material immediately. They should also report the incident to their line manager, the DSO or the Head of Learning & Development. Breach of this will be treated as gross misconduct.

Where exemption is required, because of the nature of the work of the member of staff, permission must be given in advance by the line manager, DSO and in consultation with the IT services provider. Children and vulnerable adults must not be given access to such websites.

8.5 Children or Vulnerable Adults Obtaining Indecent Images or “Sexting”

If a child or vulnerable adult reports to a member of staff that they have sent, or been sent, indecent images (sometimes referred to as “sexting”), they should discuss the concern with the Designated Safeguarding Officer.

The police and children's social care should always be contacted if:

- Somebody involved is over the age of 18 or under the age of 13.
- There are concerns about the ability to give consent.
- The images are extreme or show violence.
- The incident is intended to cause physical or emotional harm.
- There is reason to believe that the young person has been blackmailed, coerced or groomed.

Details of the incident and the actions taken must be recorded in writing.

Staff should avoid looking at the image, video or message in question. If it is on a device belonging to PeopleCert, it may need to be isolated so that nobody else can see it. This may involve blocking the network to all users.

9 Confidentiality and Sharing Information

9.1 Confidentiality and the Possible Impact on the Child or Vulnerable Adult

In any work with children and/or vulnerable adults it is important to be clear about confidentiality. Confidentiality and safeguarding should be discussed with children/vulnerable adults at the beginning of any piece of work, with reminders and information given from time to time, to ensure that they understand the processes and what responsibilities members of staff have. It is absolutely essential to be clear about the limits of confidentiality well before any such matter arises.

While personal information held by professionals and agencies is subject to a legal duty of confidence and should not normally be disclosed without the subject’s consent, it is essential that staff respond quickly where they have concerns or suspicions of abuse. Any concerns about confidentiality should not override the rights of children and/or vulnerable adults at risk of, or suffering, harm. PeopleCert’s responsibility for protecting children and vulnerable adults means that, where necessary to protect welfare, it will breach confidentiality to raise concerns.

Information sharing must be done in a way that is compliant with the General Data Protection Regulation, national data protection legislation, Human Rights legislation, and the applicable laws of confidentiality. However, a concern for confidentiality must never be used as a justification for withholding information when it would be in the child or vulnerable adult’s best interests to share information.

9.2 Do not Promise to Keep Secrets

Should it become necessary to pass on information shared by another party this decision should always be discussed with the person in question and where possible their cooperation sought beforehand. Explanations of the reasons; processes; likely sequence of events; and who to contact for information or for support should also be provided.

When a child or vulnerable adult makes an allegation of abuse, they may hope that the abuse will stop without further enquiries. They may fear the effect this will have on their family and may fear retribution from the abuser. They should be helped to understand why the referral (to the Designated Safeguarding Officer) must be made and what is likely to happen as a result. It is important to reassure the child or vulnerable adult, but s/he must not be told that their allegation will be treated in a particular way or that the information will be kept a secret.

A record should be kept of any decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

9.3 Confidential Record-Keeping

Even if a concern has been discussed with a line manager/ the DSO, it is important that all concerns are properly recorded in writing whether or not further action is taken. PeopleCert has a standard Safeguarding & Child Protection Report form for recording suspected abuse to help people record relevant information. This form must be used for all concerns and passed as soon as possible to the DSO.

It is important that concerns raised are recorded accurately and in detail. All discussions should end with clear and explicit recorded agreement about who will be taking what action. Where no further action is the outcome the reason for this should be clearly recorded.

Some of the information requested by the form may not be available. Staff should not pursue the questioning of the child or vulnerable adult for this information if it is not given freely. There should be no delay in reporting the matter by waiting for all the information.

In completing the form, it is important not to write speculative comments but to stick to the facts. Staff's opinion may be crucial, but it should be recorded as an opinion and any evidence stated to support these opinions. Records pertaining to issues of child protection may be accessible to third parties such as Children's Services, Police, the Courts and Solicitors.

Records must be kept securely in a locked place or file to which access is restricted. Managers have a particular responsibility in maintaining the confidentiality of these records and must ensure that the records, or any information they contain, are made available only to relevant parties. The transfer of information - verbally, through the mail, electronically, etc. - should be done in such a way that confidentiality is maintained.

On and off-site Activities

A Risk Assessment should be carried out at least 48 hours before any activity involving a child and/or vulnerable adult takes place. Safeguarding and Code of Conduct procedures apply whether the activity is on or off-site.

10 Safe Recruitment

10.1 Recruiting Staff

Some roles within PeopleCert, may involve working directly with children and/or vulnerable adults. Where this is the case, the relevant member of staff will be required to have a background check carried out prior to commencing any direct work with children and/or vulnerable adults. Where a criminal conviction is disclosed by an applicant or through a background check/basic disclosure, the employees' line manager and the HR Manager or the Head of Learning & Development, will consider this assessment objectively and, where the assessment indicates that the level of risk is too high to allow the individual to start/continue working in a particular role/activity, the consequences of this for the individual will be dependent upon:

- The check concerned.
- The reason for the check (that is, check for a new employee, a recheck for an existing employee in their current post or a check for an existing employee in a new post).
- Relevant legislation.
- The post concerned.
- Whether the individual is suitable for other employment opportunities available within the organisation.

Possible outcomes include amended duties, redeployment, withdrawal of an offer of employment or, where the individual started work before the relevant screening check was completed, dismissal. Safe recruitment practice of checking work history, identity and explanations for any gaps must be followed for all staff working at PeopleCert and related companies, even if direct contact with children and/or vulnerable adults is not part of their role.

10.2 Supporting Staff

It is the responsibility of managers to ensure that the staff they line manage are aware of and understand the procedures and have levels of knowledge and skills commensurate to the level and nature of their direct involvement with children and/or adults.

All staff should:

- Be supervised and supported in their work.
- Work within PeopleCert safeguarding procedures, which are reviewed and updated as necessary.
- Receive training in safeguarding at a level appropriate to their work situation.
- Be able to raise concerns about poor and dangerous practice through PeopleCert's Whistleblowing policy.
- Have training and support, as required, to effectively discharge their responsibilities.

10.3 Allegations Against Staff

Any suspicion, allegation or actual abuse of a child or vulnerable adult by an employee, Board member, associate, contract, or unpaid staff must be reported to the Designated Safeguarding Officer and/or to the Head of Learning & Development immediately. Concerns about staff must be treated with the same rigor as other concerns. If there are concerns that abuse has taken place, the DSO will pass this information to the local authorities for investigation.

The DSO and senior managers will also need to refer to the company's disciplinary policies/procedures and decide whether the member of staff should be suspended pending a full investigation. If the member of staff is not happy with the response they receive from the DSO, then they should refer to PeopleCert's Whistleblowing Policy.

There may be instances when a staff member's performance or conduct when working with children and/or vulnerable adults will lead to PeopleCert's disciplinary procedures being invoked. The nature of the concern about the staff member's conduct and or performance will determine how and what disciplinary action is taken.

On occasion, a child or vulnerable adult may abuse another child or vulnerable adult. In these situations, safeguarding procedures should be followed in respect of all parties.

11 Complying with This Policy

11.1 Expectations of Employees

It is important that staff work to a high standard of professional conduct and act with integrity at all times, in order to minimise the risk of abuse from within PeopleCert. It is important to create a work environment where the risk of abuse is minimised, and children/vulnerable adults feel comfortable and safe. When incidents of abuse are raised or suspected it is important that staff have the necessary information, support and that they follow the procedures appropriately.

Staff should:

- Ensure they have read PeopleCert’s safeguarding procedures in full.
- Highlight and discuss any issues requiring clarification and any training issues with their line manager.
- Ensure that they have a working knowledge of the different forms of abuse and possible indicators.

When working with children and/or vulnerable adults, all staff, colleagues, and other staff from associated organisations must have the appropriate employee checks in place. This must include checks on their full career history, identity, proof of residency, criminal record and references.

11.2 Freelance Staff and Associates

It is the responsibility of the commissioning manager to ensure that these staff are familiar with this document and agree to work within this framework. If there are any concerns with the conduct of freelance staff or associates, these concerns must be raised following the steps outlined in this policy.

12 Contact Details and Actions

PeopleCert has a Designated Safeguarding Officer (DSO) who is primarily responsible for the implementation of this Safeguarding policy. They are also the main point of contact when potential safeguarding issues arise and must be contacted immediately in the event of any concerns raised or allegations made.

Should any member of the PeopleCert team be unsure whether to report a concern or not, the DSO will also offer confidential support and guidance to ensure that the situation is managed appropriately.

The PeopleCert DSO is Mrs Dimitra Karakosta, and in the event of any concerns being raised or allegations being made, she should be contacted immediately.

If the DSO is not available, then the Head of Learning & Development will take on the safeguarding responsibilities and they should be contacted instead.

It is essential that when managing safeguarding concerns that all documentation and correspondence is kept securely and limited to those who need to know. Do not discuss concerns with anyone other than the DSO (or their named deputy). To avoid inadvertent disclosure of information whenever communicating (via email, telephone or face-to-face), it is key that the following safeguards are implemented:

- Ensure privacy.
- If communicating via email, avoid using specific details in any headers.
- If communicating via telephone, digitally (e.g. web-call) or face-to-face, ensure you cannot be overheard.

To raise a safeguarding concern, you can contact our DSO, Dimitra Karakosta at Dimitra.Karakosta@PeopleCert.org, telephone number: +302103729099.

Alternatively, in her absence, you may contact the DSO’s deputy, Danai Bafa at Danai.Bafa@peoplecert.org, telephone number: +302103729138.

