

Document Name	Safeguarding Procedures
Purpose	Internal guidance and compliance
Date	Updated 24 February 2018
Target audience	Trustees, staff, interns, volunteers, representatives, associates, service contractors, consultants, guests as well as its international and local implementing partners (known from hereon as temporary or permanent stakeholders)
Document description	These procedures outline All We Can's approach and guidance to safeguarding for all individuals that All We Can comes into contact with specific application to children, young people and adults-at-risk and the main procedures that must be followed to comply. It also serves as a frame of reference for All We Can's international and local implementing partners who are fully expected to act in accordance with the principles therein.
Relevant All We Can policies	AWC Employee Handbook Whistle-Blowing Policy Personal Harassment Disciplinary Procedures Grievance Procedures Lone Working Risk Assessment Policy and Procedures Whistleblowing Policy and Procedures Equality and Diversity Policy and Procedures DBS Policy and Procedures Volunteer Policy Digital Safeguarding (included herein as Annex 4)
Current relevant Legislation	Children Act 1989 and Children Act 2004 Safeguarding Vulnerable Groups Act 2006 Protection of Freedoms Act 2012 Care Act 2014 Data Protection Act 1998 (note: GDPR, May 2018) Human Rights Act 1998 Public Interest Disclosure Act 1998 (does this apply too?)
Superseded documents	MRDF Child Protection and Safeguarding Procedures
Document status	This document is controlled by the Senior Management Team and is posted on the All We Can Hub, from where it can be easily accessed by all staff. These procedures will be regularly monitored by All We Can's Senior Management Team and will be subject to periodic review, as necessary.

SAFEGUARDING CHILDREN, YOUNG PEOPLE AND ADULTS-AT-RISK

2. PROCEDURES

2.1 ACTIONS & CONSIDERATIONS

The first priority should always be to ensure the safety and protection of children and adults at risk. Therefore, it is the responsibility of all staff and stakeholders to act on any suspicion or evidence of abuse or neglect and to pass on their concerns to the relevant person or agency.

- In situations of immediate danger, take urgent action by calling the relevant emergency services (e.g. Police, Ambulance, GP).
- Remember to have regard for your own safety. Leave the situation if it is not safe for you.
- Listen to the child or adult at risk, offering necessary support and reassurance.
- Issues of confidentiality must be clarified early on. For example, staff or volunteers must make it clear that they will have to discuss concerns with the SPO/Deputy SPO.
- Where a child or adult at risk expresses a wish for concerns not to be pursued then this should be respected wherever possible. However, decisions about whether to respect the individual's wishes must have regard to the level of risk to the individual and others, and their capacity to understand the decision in question. In some circumstances the child or adult at risk's wishes may be overridden in favour of considerations of safety.
- Decisions to override the child or adult at risk's wish not to take the matter further should, if possible, be the product of discussion with the SPO/Deputy SPO.
- Take written notes as soon as practicably possible.
- Report concerns to the SPO or Deputy SPO.
- Note your concerns and any information given to you or witnessed by you and pass on to the SPO/Deputy SPO using the awcsafeguarding@allwecan.org.uk email address. (For guidance about recording safeguarding alerts, please see section 2.4 of these Procedures)
- Understand the need not to contaminate or to destroy evidence if a crime may have been committed.
- **Remember it is not necessary or advisable for you to seek evidence or investigate.** By supporting the child or adult at risk and carefully logging any information given to you at this stage, you will lay the foundations for an effective formal investigation.

2.2 RIGHTS & RESPONSIBILITIES

2.2.1 The Local Authority (If abuse has, or is suspected to have, taken place in the UK)

The relevant Local Authority (not All We Can) is responsible for investigating and acting on any allegations of abuse, following their own procedures, once they are aware of a concern.

2.2.2 The Board of Trustees are expected to:

- Review the policy and procedures every two years, or as soon as possible after significant changes in legislation or best practice guidelines.
- Check compliance to the policy and procedures through internal audit.

- Respond appropriately and promptly to any safeguarding issues or incidents reported to them by the Chief Executive/SPO.
- Seek assurance of the effectiveness of safeguarding and serious incidents activity and that practice is continuously improving and enhancing the quality of life for adults, children and young people at risk of harm that are in receipt of support from All We Can and its stakeholders.

2.2.3 The SPO/Deputy SPO are expected to:

- Make sure relevant agencies are informed immediately, on a need to know basis.
- Alert the Board of Trustees to any safeguarding issues or incidents which directly involves a member of staff or volunteer.
- Make sure that all members of staff and volunteers receive regular mandatory Safeguarding Adults training to recognise and respond to actual or suspected abuse.
- Keep the central Safeguarding Log updated, and review it on a monthly basis
- Where appropriate, check volunteers and employees that have access to or work with children and/or vulnerable adults through the Disclosure and Barring Service (DBS), and re-check every 3 years
- Ensure that members of staff and volunteers are aware of and work in line with the Safeguarding Policy and Procedures
- Make sure that all Risk Assessments are up to date and in place
- Make sure, as far as possible, that members of staff and volunteers are protected from harassment by false allegations of abuse from vulnerable persons or a third party. Any allegations made against a member of staff or volunteer will be treated seriously, but handled in a sensitive manner.

2.2.4 Members of Staff and Volunteers are expected to:

- Familiarise themselves with the examples of types of abuse and examples of signs to look out for (See Annex C).
- Make sure that they are aware of the contents of the Safeguarding Policy and Procedures and to follow its requirements.
- Make sure that a proper written confidential record is made of the incident and of any further investigation, by email to the awcsafeguarding@allwecan.org.uk address.
- Attend safeguarding training when appropriate.
- Remember that all parties involved have rights, which should be respected and balanced against each other (in line with the Human Rights Act 1988).
- Declare any existing or subsequent convictions; failure to do so will be regarded as gross misconduct, possibly resulting in dismissal.

2.3 HOW TO RESPOND TO DISCLOSURES

The following standard procedures and course of action apply in all safeguarding situations:

2.3.1 Staff member or volunteer should:

- Stay calm.
- Listen patiently.
- Reassure the person they are doing the right thing by telling you;
- Explain what you are going to do.
- Report to SPO for UK cases and Projects Director in international cases, or in their absence, the CEO or a senior manager.
- Write a factual account of what you have seen, immediately, in an email.
- Forward all information and correspondence relevant to the case to All We Can's awcsafeguarding@allwecan.org.uk email address.

2.3.2 Staff member or volunteer should not:

- Appear shocked, horrified, disgusted or angry.
- Press the individual for details (unless requested to do so).
- Make comments or judgments other than to show concern.
- Promise to keep secrets.
- Confront the abuser.
- Risk contaminating evidence.

2.3.3 The SPO will:

- Ascertain whether the situation might fall within the definitions of abuse outlined in Annex C of this policy and procedures.
- Consider the age of the person and, if relevant, the adult at risk's capacity to make decisions.
- Ascertain any immediate action required.
- Ascertain whether an investigation is necessary in accordance with internal personnel policies and procedures.
- Where abuse is suspected, conclude that a referral be made to the appropriate agency.

2.4 RECORDING INCIDENTS AND DISCLOSURES

2.4.1 Recording of concerns, incidents and disclosures must include, where possible:

- Victim details, including name, date of birth, address, phone number, etc.
- Context of the situation.
- Summary of incident or disclosure.
- Specific reason for concern in relation to risk of harm or abuse.
- What the client has been told will happen next.
- What actions, if any, have been taken.
- State what is fact and what is opinion.
- Contact details of AWC staff member or volunteer who raised the alert.
- Any other relevant information.

2.4.2 The SPO must keep a record of all the above details, as well as:

- Actions to be taken or that have been taken;
- Outcome of the situation;
- When cases were last reviewed and the date that this was done.

2.4.3 Please see Annex D for a short flow chart of how to respond to safeguarding concerns and for important phone numbers. This should be displayed in all AWC offices.

2.4.4 In the UK, it is the responsibility of social services or the police to investigate the alleged abuse. If a member of staff or volunteer becomes aware of any further information relevant to their investigation, this must be reported immediately to the SPO, who must inform the relevant contact at Social Services as soon as possible.

2.5 WITNESSING ABUSE

The following standard procedures and course of action apply in all safeguarding situations:

- Make sure that any immediate needs of the alleged victim are dealt with in a timely manner, that the victim is safe and that emergency medical treatment is arranged if

- necessary and that no forensic evidence is lost
- Clarify the facts available but not to investigate further
- Make an evaluation of whether the victim(s) and/or anyone else needs immediate help (e.g. doctor/hospital). If so, first aid must be administered, and the relevant medical services should be called
- Consideration should be given as to whether it is considered safe for the victim(s) to return home if the situation is potentially abusive
- Do not inform or have any conversation with the alleged perpetrator regarding the conversation with the victim(s), nor with their parents/guardians if this could put the victim(s) at risk
- Immediately inform the SPO or Deputy SPO at All We Can, in the strictest confidence, with a record of all observations. The leaders of the partner organisation will be involved, where appropriate, in making decisions on the next course of action.
- All steps in the above section should be followed.

2.6 DISCLOSURES TO ALL WE CAN STAFF ON INTERNATIONAL TRIPS

The face-to-face contact that All We Can staff have with partners is usually limited to the time in the field when visiting partners, during which they are normally accompanied by partner staff. Should an All We Can staff member encounter abuse or if it is disclosed to them during a partner visit, the staff member must work in close conjunction with the relevant partner staff to appropriately respond in line with the guidance in this policy, procedures and Safeguarding Code of Conduct.

2.7 SUPPORT FOR THOSE WHO REPORT ABUSE

All those making a complaint, allegation or expressing concern, whether they are staff, clients, partners, stakeholders, volunteers or members of the public should be reassured that they have the right to:

- Be made aware of the Safeguarding Adults at Risk policy.
- Have alleged incidents recognised and taken seriously.
- Have their comments treated confidentially, but their concerns may be shared if they or others are at significant risk of harm or abuse.
- Immediate protection from the risk of reprisals or intimidation.
- Receive fair and respectful treatment throughout.
- Be involved in any process as appropriate.
- Receive information about the outcome.

2.8 SAFER RECRUITMENT, DBS AND TRAINING OF STAFF

2.8.1 Members of staff are expected to follow All We Can's DBS Policy and Procedures. An enhanced DBS disclosure is required for all relevant All We Can members of staff and volunteers and a satisfactory disclosure is required before a member of staff takes up employment. All We Can follow Safer Recruitment principles and guidelines for all posts where contact with children and/or adults at risk is possible. This includes a full application process, interviewing candidates, taking up and verifying two satisfactory references, verifying qualifications, identity checks, and a full DBS check, as outlined above.

2.8.2 All We Can provide safeguarding training to all trustees, staff, interns, volunteers, representatives, associates, service contractors, consultants, guests as well as its

international and local implementing partners. Training is delivered by an accredited trainer and certificates of attendance issued.

2.8.3 New staff and board members joining All We Can subsequently will receive training as part of their induction processes. Training updates will be carried out periodically and at a minimum every 3 years.

2.9 INTERNAL INVESTIGATION

2.9.1 If allegations of abuse or malpractice are made against any All We Can trustees, staff, interns, volunteers, representatives, associates, service contractors, consultants, guests as well as its international and local implementing partners, the following steps are to be taken:

- The responsible line manager must inform All We Can's SPO about all the complaints and allegations, providing as detailed a report as possible
- The SPO will work in conjunction with any other relevant line manager(s) to launch an open minded and thorough investigation of any allegation, with priority being placed on protecting the victim(s) from any further abuse and exploitation.
- The SPO will work with the Human Resource (HR) providers (Peninsula¹) to institute any measures to protect the staff member while investigations are being carried out. This may include a request for the staff member to stay away from the office whilst a thorough investigation is being conducted. This should in no way implicate blame, but is a measure taken to protect the victim as well as the staff member. During their period of absence from the office whilst investigations are being carried out, the staff member will remain on full pay. All subsequent matters regarding reinstatement or otherwise will be managed by the HR providers.

2.9.2 If, following internal investigation, it is considered that the actions, conduct or behaviour of any All We Can member of staff makes them unsuitable to work with children and/or vulnerable adults, disciplinary action may be taken and they may be reported to the Disclosure and Barring Service (DBS) and/or the Local Authority Designated Officer (LADO), if in the UK, or relevant body locally. In the case of a volunteer, appropriate action would be taken in line with All We Can's Volunteer Policy.

2.9.3 There will be times when the behaviour of employees may constitute a breach of the Safeguarding Code of Conduct, but not be considered criminal conduct under local legislation. In this instance, All We Can will consider providing other support to these staff, for example, training, counselling, increased supervision or transfer to other duties. There may be cases, however, where All We Can feels it is appropriate to dismiss an employee even if the behaviour is not criminal, for example a gross violation of the Safeguarding Code of Conduct.

2.9.4 Identifying information about safeguarding should be shared on a 'need to know' basis only. Any staff members who raise concerns of serious malpractice should be protected as far as possible from victimisation or any other detrimental treatment if they come forward with serious concerns, provided that concerns are raised in good faith. Deliberate false allegations are a serious disciplinary offence and investigated by All We Can.

2.9.5 The subject of the complaint (alleged perpetrator) and all witnesses must cooperate fully and openly with internal and statutory investigations and hearings. Their confidentiality will be protected and information which could identify them will be shared on a 'need to

¹ At the time of developing this policy All We Can has contracted Peninsula Group Limited, to provide HR services.

know' basis.

2.10 EXTERNAL CONCERNS

All We Can staff should be able to differentiate between internal and external concerns. **Internal concerns** are those where persons covered by the policy are the alleged perpetrators, i.e. AWC staff, volunteers, partners, stakeholders. **External concerns** are abuses, which would usually be considered criminal under local legislation, and perpetrated by persons not described in the scope of this policy. In situations where local legislation may be weaker than All We Can's policy and Safeguarding Code of Conduct, staff should be obliged to abide by the Safeguarding Code of Conduct, keeping in mind at all times the best interests of the child and/or vulnerable adult.

All We Can should not ignore any safeguarding concerns. However, abuse in the wider community is an external concern, and All We Can will do all that is reasonable and practicably possible to appropriately and efficiently refer cases on. If a child or vulnerable adult is in immediate need of attention then staff must act, but the employee must consider in advance how much support they are qualified or able to provide, and recognise when it is best to refer.

2.11 SUPPORTING PARTNERS AND COMMUNITIES

All We Can informs partners, children, adults at risk and communities on the conduct we expect of staff and others associated with the organisation. All We Can ensures the Safeguarding Code of Conduct is translated into all relevant languages, where possible, and that it is available in illustrative, low-literacy and/or a child-friendly format. We also ensure that in the information to the communities, names, e-mail addresses and phone numbers to access are correct and immediately updated when changes take place.

While providing a comprehensive framework, the intention is that those with responsibility for safeguarding should make the document relevant to their own context and circumstances. However, it is hoped that the principles that underpin these standards will be readily endorsed by all wherever they work.

2.12 RISK ASSESSMENTS

Risk assessments consider an individual's vulnerabilities and situations where staff and volunteers may be put in a position of trust, e.g. leading events with children or young people, visiting schools, or vulnerable communities on international trips, etc.

Members of staff and volunteers must make sure that they have seen and understand any relevant Risk Assessments before they have contact with groups of children, young people or adults-at-risk or individuals, and that they follow any guidelines which have been put in place.

Members of staff and volunteers must adhere to the Risk Assessment Policy (which one/ones – to be named? Eg Lone Working and Lone Working Checklist) and Procedures.

Members of staff and volunteers also have individual risk assessments in place that relate to their roles at All We Can (can we name them here to ensure the reader is aware of them and that they are readily accessible?).

2.13 MONITORING AND IMPLEMENTATION OF INTERNATIONAL PARTNERS

All We Can Partnership Managers and Local Coordinators will monitor partners' implementation of their safeguarding policies and procedures in the following ways:

- During visits, staff will meet with the partner organisation Director and/or the designated safeguarding officer (where applicable) to discuss how the policy is being used;
- Meet with different members of staff (especially those that work in programmatic roles) to discuss the policy and ensure that it is widely understood and followed by the organisation;
- All We Can have developed a quality assurance tool (See Annex E) to check that partners periodically review their safeguarding policies, and that they continue to develop and strengthen both the policies and the procedures in line with All We Can's Safeguarding Code of Conduct.

All We Can requires all partners without a safeguarding policy to sign up to their Safeguarding Code of Conduct. In addition to this, All We Can support these partners to develop and implement a safeguarding policy by:

- i. Providing training opportunities as appropriate, to develop and maintain the necessary skills and understanding among staff to safeguard children and adults-at-risk. This may include running training workshops or offering advice during a visit or linking the partner's appropriate external support.
- ii. Engaging with partners on how they can adapt some of the All We Can procedures to make them more suitable for local use.
- iii. Providing guidelines on monitoring its use.
- iv. Supporting partners to develop feedback mechanisms for community members to provide information anonymously or confidentially about all aspects of the programme, including possibly reporting suspected abuse by its staff. This system will be managed by specially trained staff members.

2.14 WHISTLEBLOWING

If a member of staff or volunteer knows or suspects that abuse is taking place that involves someone connected to All We Can, in any capacity, they must report it immediately, following the procedures shown above, and detailed in the Whistleblowing Policy and Procedures. (Cross reference note: Procedures are not set out in a separate document - consideration perhaps for a review of a more detailed Whistleblowing Policy and Procedures with reference links to the Safeguarding Policy and Procedures?)

Staff will be given support and afforded protection if necessary in line with the Public Interest Disclosure Act 1998.

If they feel unable to report abuse or suspected abuse to a member of staff (Cross reference note: the All We Can Whistleblowing Policy – which forms part of the Staff Handbook states that the Chair should be notified of any concerns in the first instance – at odds with this paragraph) , they should contact the Chair or Vice Chair of the Board of Trustees (whose details can be found in Annex D of this policy).

2.15 SUMMARY

- The employee or volunteer's primary responsibility is to protect the child, young person or adult-at-risk, if they are at risk;
- Each employee or volunteer has a duty to take action;
- Employees or volunteers should not have to cope alone.