

SAFEGUARDING: PROTECTING CHILDREN AND VULNERABLE ADULTS POLICY

1 Purpose & Scope

In relation to children and young people, Credo Care adopts the definition used in the Children Act 2004 and the Department for Education (DfE) guidance document: Working Together to Safeguard 2015 (Introduction), which defines safeguarding and promoting children and young people's welfare as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

The above statutory guidance defines child protection as part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

This document adopts the two key principles from guidance, Working Together to Safeguard Children 2015:

- safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part; and
- a child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of children.

1.1 Safeguarding Children

The action we take to promote the welfare of children and protect them from harm is everyone's responsibility. Everyone who comes into contact with children, young people and vulnerable adults has a role to play. Everyone who works with children has a responsibility for keeping them safe. Safeguarding best protects people when professionals are clear about what is required of them individually, and how they need to work together. This policy aims to help all those who work for Credo Care to understand what they need to do, and what they can expect of one another in safeguarding. The child's needs are paramount and the needs and wishes of each child, be they a baby, infant or an older child, should be put first, so that every child receives the support they need before a problem escalates. All professionals who come into contact with children and families are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children. All professionals share appropriate information in a timely way and can discuss any concerns about an individual child with colleagues and local authority children's social care. Remember that the Data Protection Act 1998 and Human Rights Laws are not barriers to justify information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately. Share with informed consent where appropriate, and where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.

This policy also outlines the child protection principles and procedures in place at Credo Care and has been written in line with current Government guidance and requirements. It is expected that all foster carers and employees are aware of the policy and the procedures to follow in the event of suspected or actual abuse. All foster carers, employees and other professionals working on behalf of Credo Care will receive training in this area, as part of their induction to the organization. Failure to follow these procedures will become a disciplinary matter.

All Credo Care employees, and those who undertake work on Credo Care's behalf, must maintain a proper focus on safeguarding children, young people and vulnerable adults, and this must be reflected both in sound individual practice and in our internal policies and guidance. All permanent and contracted staff working with children and young people (including young people who are vulnerable adults) must:

- give highest priority to their safety and welfare
- recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people
- respond appropriately to disclosure by a child, or young person, of abuse
- respond appropriately to allegations against staff, other adults and against themselves
- understand and implement safe practice in carrying out their duties in inspection
- be alert to the risk which abusers, or potential abusers, may pose and vigorously pursue concerns to ensure that providers are able to demonstrate a similar level of commitment
- be aware of the importance of the role of inspected services in promoting the safety and welfare of children and young people
- contribute as necessary, to all stages of Ofsted's safeguarding and protection processes
- be aware of our policy on CSE, Missing Persons, E safety policy as they relate to this document.
- Be aware of the Sexual Offences Act 2003 and the possible abuse of power by persons in a position of trust.

Any allegations must be reported. All allegations will be treated seriously. The rights and welfare of the children and young people will be protected and respected at all times.

Children and young people need to know that they have a right to be protected from behaviour that is rough, hurtful, makes them unhappy or uncomfortable, or that is abusive. Where abuse is evident or suspected it is the procedures of the "Host Authority" which should be followed. That is the Local Authority in which the foster carers live and where the child is placed. The Local Authority, in conjunction with the placing Authority, will undertake any investigation in accordance with their procedures. These are laid down in The Children Act 1989.

1.2 Vulnerability of Some Disabled Children

All practitioners and agencies working with disabled children should have regard to Safeguarding Disabled Children: Practice Guidance (DCSF 2009). Evidence cited in this guidance, suggests disabled children are at increased risk of abuse and the presence of multiple disabilities increases the risk of both abuse and neglect. They are also found to be less likely to be consulted in routine assessments.

The disabled child may be especially vulnerable because of a number of reasons:

- Many disabled children are at an increased likelihood of being socially isolated with fewer outside contacts than non – disabled children
- Their dependency on parents and carers for practical assistance in daily living, including intimate personal care, increases their risk of exposure to abusive behaviour
- They have an impaired capacity to resist or avoid abuse
- They may have speech, language and communication needs which may make it difficult to tell others what is happening
- They often do not have access to someone they can trust to disclose that they have been abused
- They are especially vulnerable to bullying and intimidation
- Children may have multiple care placements

It should be remembered that disabled children are children first and foremost and have the same rights to protection as any other child. Disabled children must be responded to as individuals with their own specific needs, feelings, thoughts and opinions. Safeguards for disabled children are essentially the same as for all other children. Particular attention should be paid to promoting a high level of awareness of the risks of harm and high standards of practice, and strengthening the capacity of children and families to help themselves. Measures should include:

- Making it common practice to help disabled children make their wishes and feelings known in respect of their care and treatment
- Ensuring that disabled children receive appropriate personal, health, and social education (including sex education)
- Making sure that all disabled children know how to raise concerns, and giving them access to a range of adults with whom they can communicate. Those disabled children with communication impairments should have available to them at all times a means of being heard
- An explicit commitment to, and understanding of, disabled children's safety and welfare among providers of services used by disabled children
- Close contact with families, and a culture of openness on the part of services
- Guidelines and training for staff on good practice in intimate care, working with children of the opposite sex, handling difficult behaviour, consent to treatment, anti-bullying strategies, and sexuality and sexual behaviour among young people, especially those living away from home
- Guidelines and training for staff working with disabled children aged 16 and over to ensure that decisions about disabled children who lack capacity will be governed by the Mental Health Capacity Act 2005 once they reach the age of 16
- Children who receive overnight short breaks and residential schooling should have their care plan reviewed by an Independent Reviewing Officer (IRO)

In addition to the universal indicators of abuse / neglect mentioned (see Recognition of Significant Harm Procedure) the following abusive behaviours must be considered:

- Force feeding
- Unjustified or excessive physical restraint
- Rough handling
- Extreme behaviour modification including the deprivation of liquid, medication, food or clothing
- Misuse of medication, sedation, heavy tranquillisation
- Invasive procedures against the child's will
- Deliberate failure to follow medically recommended regimes

- Misapplication of programmes or regimes
- Ill-fitting equipment e.g. calipers which may cause injury or pain, or inappropriate splinting;
- Misappropriation/misuse of a child's finances
- Not allowing a child to develop and have social and educational opportunities
- Parents may fabricate and induce illness in their disabled children (see procedures on Fabricated and Induced Illness)

Some disabled children live, or receive short breaks away from home and this may increase their vulnerability. Where a child is unable to tell someone of the abuse they may convey anxiety or distress in some other way, e.g. behaviour or symptoms and carers and staff must be alert to this.

Safeguarding and promoting the welfare of all children has at its heart effective communication with children. This is no different for disabled children. There are a number of imperatives to maximise disabled children's opportunities to communicate. These are important for all disabled children and particularly for those with speech, language and communication needs, including deaf children and those who use non-verbal means of communication. Credo Care is a specialist service for children with disabilities including complex medical needs and therefore carer's and staff training incorporates general and specific training based on individual children's needs. Good training and programmes of continuing professional development are key to the effective safeguarding and promoting the welfare of disabled children.

1.3 Vulnerable Adults

The legal and policy basis for responding to concerns regarding the safeguarding and welfare of vulnerable adults is different from that of children and young people under 18. Working Together to Safeguard Children 2015 only applies to children and young people until they reach the age of 18. Any incidents or concerns relating to a young person of 18 years and over, even if still at school, are not covered by Local Safeguarding Children Boards or their procedures.

The definition of abuse of adults is contained in 'No Secrets' (para 2.5). Abuse is a violation of an individual's human and civil rights by another person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Credo Care operate supported lodgings / staying put programmes which are implemented in partnership with the relevant Local Authority. Credo Care adheres to the local adult safeguarding procedures for the area the young person is resident within. These policies / links are made available to host carers at the time of transition. All host carers are expected to report adult safeguarding issues to the relevant authority and notify Credo Care.

2. **Procedure**

2.1 Definitions of Abuse

The following definitions are used to assist foster carers and employees in deciding whether abuse may have occurred. They aid in defining the difference between allegations of harm and discussions over standards of care. They are broken down into five categories;

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Adult abuse / Financial abuse

Neglect: the persistent or severe neglect of a child, or the failure to protect a child from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development, including non-organic failure to thrive.

Physical Abuse: can include slapping with a hand, belt or other object, shaking, punching or throwing a child across the room. Physical abuse may also take the form of induced or fabricated illness.

Sexual Abuse: is the involvement of a child or young person in sexual activities to which they cannot give consent and which are not acceptable by our society. This includes touching, attempted or actual sexual intercourse. It also includes non-touching activities which expose a child to sexual matters inappropriately, for example indecent behaviour in front of a child. Involving a child in pornography or causing a child to view pornography is also included in this category. Some internet chat room activity may also fall into the category of sexual grooming or abuse.

Emotional Abuse: may include rejecting a child, ignoring or refusing to show a child affection, belittling, threatening or verbally abusing a child. A child may suffer or be at risk of suffering from one or more types of abuse. This may take place on a single occasion or may occur repeatedly over time.

Adult Abuse / Financial Abuse: when a vulnerable adult has been placed with a service, that service has an obligation to ensure that they are provided with support appropriate to their needs. Financial abuse involves the improper, illegal or unauthorized use of an adult's resources for the benefit of another. Signs and symptoms of financial abuse include:

- Unpaid bills
- No money for food, clothing, or medication
- Unexplained withdrawal of money from someone's bank account
- Family member or representative refuses to spend money on the adult's behalf
- Possessions disappear
- Family member or another person forces an adult to sign over Power of Attorney against their own will

2.2 Procedures to Safeguard Children Placed with Foster Carers

Credo Care has a clear policy on the recruitment, training and support of foster carers and employees. This follows the legal requirements set out in the Care Standards Act. All Foster carers, employees and contract workers are thoroughly vetted prior to the commencement of working with vulnerable children. Please refer to FP04 Foster Carer Recruitment and Selection Policy & SP20 Staff Recruitment Policy.

Foster Carers are expected to attend the core training modules within their first 18 months of fostering; this covers child protection issues, appropriate behaviour management, safe handling and

safe care, with particular attention to the needs of children and young people with ASD and communication difficulties.

All foster carers are supervised by an appropriately qualified and experienced social worker at least once a month. Unannounced visits also occur throughout the year. This allows for monitoring of the foster carers. Credo Care supports the need for children in placement to be seen alone by their own social worker so that they have an opportunity to talk freely about their care and any other matter. The child's social worker may also see the child's bedroom at any time in order to monitor standards.

2.3 Procedures Following a Disclosure, Allegation or Suspected Abuse

If a foster carer, employee or other person connected to Credo Care suspects that a person may have:

- Behaved in a way that has, or may have, harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in a way that indicates he or she is unsuitable to work with children

They must inform the fostering service, usually the Fostering Manager, who will ensure that proper protocols are followed in the reporting or investigation of any such suspicions or allegations. A child in their care may have been abused, or is making an allegation of abuse, and then this must be reported to their supervising social worker or their line manager immediately. The appropriate social services department will then be notified by the agency.

When an incident or allegation occurs which implicates one of our foster carers, or concerns around a person in a position of trust, then the following process should be completed.

On being informed of a potential safeguarding issue the individual should record information making reference to the following points:

- Date and time of contact
- Name and designation of person reporting the allegation
- Names of individuals involved
- Description of alleged incident

This information should then be passed to the following:

2.3.1 Registered Manager:

Greg Nicholls, g.nicholls@credocare.co.uk
Tel. 01797 322226 or Mobile 07793 582760

Responsible Individual:

Neil Annis, n.annis@credocare.co.uk Tel. 01797 322226 or 07775 927732

Practice Manager

Nikki Watton n.watton@credocare.co.uk Tel 01455 207975 or 07525 798755

The above named two individuals have been identified as Senior Officers in keeping with the Department for Education (DfE).

- 2.3.2 The relevant Safeguarding Authority should immediately be contacted to secure the services of a Local Authority Designated Officer (LADO) via the following contact details:

Contact Addresses Children's Safeguards Service: Host Children's Safeguarding Board website. Working in partnership with the Safeguarding Agency a nominated lead practitioner from the host authority will be nominated to 'lead' the investigation into the allegations. The lead investigator will arrange a strategy meeting between all relevant professionals and attempt to arrange this within a three day timescale.

- 2.3.3. Placing authority social workers should also be contacted and informed that an allegation has been made.

- 2.3.4 If there are other foster children living within the foster home then their placing social workers should be informed also.

The lead investigator nominated from the host authority will make arrangements with an officer from the Police Child Protection Unit if deemed appropriate to do so.

- 2.3.5 An Ofsted Notification, Regulation 36 needs to be completed and returned to: Provider Notifications, National Business Unit, Ofsted, Royal Exchange Buildings, St Ann's Square, Manchester M2 7LA and a copy placed on file.

The alleged incident must also be recorded in the Review of Quality of Care, (Regulation 36) for the month that the alleged incident occurred. The allegation should also be recorded in the Allegations or Suspicions of Abuse log in the Credo Care Ofsted Files.

- 2.3.6 Additional Actions and Guidance

On completion of the investigation into the allegation of abuse, an 'Outcomes Form' (available from the LADO) should be completed by the 'Senior Manager' (as identified earlier) and returned to the safeguarding authority and copies placed on file.

Local Authorities have indicated that all investigations should be completed within 4 weeks. A target of 90% of all investigations completed within 4 weeks has been set by the DfE.

The Child Protection Team in the foster carer's area and the child's local authority social worker will be notified of the allegation. They will take the lead in the investigation, keeping Credo Care informed.

Credo Care will notify Ofsted of the instigation and outcome of any child protection investigation. Clear records of the investigation will be kept in a separate file held by the Fostering Manager.

The host Local Authority will decide if an investigation is required. This normally follows a strategy meeting.

If an allegation is made against a foster carer or employee the same procedures will be followed.

2.4 Disclosure of Abuse

If a disclosure of abuse or allegation of abuse is made, the following steps must be taken:

- Listen to what is being said but do not ask questions.
- Reassure the child that you have listened and understood what has been said.
- Explain that you need to let a social worker from Credo Care know and that they will talk to their LA social worker.
- Write down in detail exactly what the child/young person has said and date this.
- Notify the supervising social worker/ line manager from Credo Care. If they are not available, ask to speak to the Fostering Manager or Responsible Individual. This telephone call should also be logged.
- If this disclosure or allegation occurs out of hours, the emergency number for the agency should be used.
- It is not for either the foster carer or the agency to decide whether the allegation is true or not. All allegations **must** be reported.
- If a child makes an allegation against a foster carer or member of Credo Care's staff, the information should not be shared with the foster carer or staff member at the outset – the local authority responsible for any investigation will determine what details, if any, may be shared with the foster carer or staff member and when.
- Any allegations about Credo Care staff should be reported to the Fostering Manager or, if not available, to the Responsible Individual.
- All actions of Credo Care staff and foster carers following an allegation should be managed and coordinated by the Fostering Manager.

For suspected abuse the same procedure must be followed. Due to their needs, many of the children placed within Credo Care may not be able to verbally disclose abuse, therefore foster carers and employees must be observant for signs of abuse. Please see CP02 Anti Bullying Policy for further information.

2.5 The Investigation

The following processes will be adopted to ensure a fair and thorough investigation is conducted;

- It is usual that, once an allegation has been reported to Social Services, the investigating authority convenes a strategy meeting.
- The purpose of a strategy meeting will be to agree roles, tasks and timescales.
- If a meeting is not convened, this discussion should occur through telephone calls.
- It would normally be the investigating workers from the Local Authority who will interview the foster carers, children and any other relevant parties.
- A decision may be made at any stage of an investigation that a child should be removed from the place of the alleged abuse. If this is the foster home, consideration will be given to the risks and needs of other children in the home.
- This will be judged on the assessed risk of significant harm.

2.5.1 Support for the Foster Carer / Employee Facing an Investigation

The Fostering Manager or Responsible Individual will liaise directly with the investigating authority as per the local child protection procedures. It will be decided by the authorities whether the allegation warrants suspension from fostering / employment duties, and the removal of children placed.

Credo Care believes it is good practice to continue support and supervision by the usual line manager / supervisor. However, for this to be achieved it is important that they are not directly involved with the investigation process. During supervision and support meetings with their line manager, the allegation cannot be discussed but the practical aspects of what happens in an investigation and the emotional impact can and will be addressed.

This may be through:

- Advising the carers/staff member of their rights.
- Providing information about other areas of help, for example legal services.
- All Credo Care foster carers are members of Fostering Network and carers should seek professional advice from them.
- Keeping foster carers / staff member informed about the process of an investigation.
- Ensuring the foster carers /staff member understand the process.
- Ensuring the foster carers / staff member are properly informed about the outcome of the investigation.

2.5.2 After the Investigation

The following processes will be implemented after the investigation:

- The foster carers / staff member will be notified in writing of the outcome of the investigation.
- The placing Social Services will be responsible for informing parents, foster children and other relevant parties of the outcomes, as appropriate.
- A copy of all appropriate minutes or notes relating to the investigation and outcome will be placed on the foster carers / staff members file and the child's file.
- Copies of minutes and notes will be kept centrally for Credo Care monitoring purposes.
- Appropriate information about the investigation and outcomes will be sent to Ofsted for their files.
- The foster carers' annual review will include a reference to the investigation and any action needed for the future.
- Where the outcome of the investigation results in concerns about the foster carer's capacity to care for children appropriately then Credo care will undertake a full review of the foster carer's approval and present it to the fostering panel for recommendation regarding further approval or termination of approval. Where the carer's approval is terminated the foster carer will be referred to Independent Safeguarding Authority. Foster carers have the right to appeal the termination via the Independent Review Mechanism.
- Where the outcome of the investigation results in concerns about a member of staff's capacity to work safely with children then the appropriate disciplinary procedures will be followed and the appropriate action taken. Where a member of staff is deemed unfit to work with children the staff member will be referred to the Independent Safeguarding Authority.
- Consideration will be given by Credo Care to offering further support to any foster family who have been under investigation.
- Foster carers or staff members may wish to complain about how an investigation was handled. Credo care will assess whether the complaint is about the actions of the local authority or other professional agencies or whether it relates to the direct actions of a member of Credo Care's staff. If the complaint relates to Credo Care's actions then the complaint will be considered under Credo Care's procedures for complaints. If the complaint relates to the actions of outside professionals then the foster carer/member of staff will be signposted to the relevant complaints body.

2.6 Safeguarding to Prevent Radicalisation and Extremism

The need to have safeguarding arrangements to promote children's welfare and prevent radicalisation and extremism is entirely consistent with childcare providers' existing responsibilities, and should not be burdensome. One of the key issues for us all is how to take account of the risks presented by extremism and radicalisation as part of safeguarding children and young people.

This advice complements the statutory guidance and refers to other relevant guidance and advice. It is intended our service will think about what they can do to protect children from the risk of radicalisation and suggests how we can access support to do this. It reflects actions that many staff, foster carers and schools will already be taking to protect children from this risk.

For early year's childcare providers, the statutory framework for the Early Years Foundation Stage sets standards for learning, development and care for children from 0-5, thereby assisting their personal, social and emotional development and understanding of the world. Schools and childcare providers will also be building children's' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff and foster carers should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. Foster carers and staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

2.6.1 Risk assessment & Radicalisation

Social workers and foster carers are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in our care and a specific understanding of how to identify individual children who may be at risk of radicalization, and what to do to support them. Protecting children from the risk of radicalisation should be seen as part of our wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. Foster carers should discuss any concerns with their supervising social worker in supervision or, in an emergency, follow the child protection procedures. As part of the supervision process foster carers can access specific training to identify and provide support for people who may be at risk of radicalisation. This can be arranged as part of your bespoke training through your supervision process.

2.6.2 Channel & Protect Agenda

Channel was first piloted in 2007 and rolled out across England and Wales in April 2012. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people. Staff and foster carers should understand when it is appropriate to make a referral to the Channel programme and discuss with the child's allocated social worker prior to any referral. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism to make referrals if there are concerns that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

The module is suitable for school staff and other front-line workers. It provides an introduction to the topics covered by this advice, including how to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types of intervention that may be appropriate, in addition to Channel.

Supplementary Guidance on Particular Safeguarding Issues

1. Safeguarding children and young people who may have been affected by gang activity
<https://www.gov.uk/government/publications>
2. Safeguarding children and young people from sexual exploitation
<https://www.gov.uk/government/publications>
3. Safeguarding Disabled Children: Practice guidance: <https://www.gov.uk/government/publications>
4. Risk assessments and Safe Care Plans, About Me Document (Credo Care)
5. Safeguarding Children policies and procedures including links to local CSGB are available and accessible to all staff.

3. Related Records & Forms

- FP04 Foster Carer Recruitment & Assessment Policy
- SP20 Staff Recruitment Policy
- CP02 Anti-Bullying Policy
- FP20 Electronic Safety Policy
- CP01 Absconson and Absence Policy
- FP21 Safe Guarding Children from Sexual Exploitation Policy
- FFC17 Child's Risk Assessment
- FFP35 Safe Care Plan
- FFC28 About Me Document

Safeguarding Vulnerable Adults:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/215591/dh_126770.pdf
[No Secrets: guidance on protecting vulnerable adults in care, Department of Health, 2010:](http://www.gov.uk/government/publications/no-secrets-guidance-on-protecting-vulnerable-adults-in-care)
www.gov.uk/government/publications/no-secrets-guidance-on-protecting-vulnerable-adults-in-care

The Counter-Terrorism and Security Act 2015, duty under section 26 this duty is known as the Prevent duty. Detail is available guidance on Channel. An online general awareness training module on Channel is available:-

http://course.ncalt.com/Channel_General_Awareness/01/index.html

	Review of Documents
Person Responsible	Fostering Manager
Date Last Updated	22/02/2017