

Safeguarding Policy

Intended users	All staff members
Overall responsibility for implementation	Lisa Gardner Director of Finance & Operations
Responsibility for maintenance	Ian Preston Director of Home Energy Services
Next review date	February 2023

The Centre for Sustainable Energy (CSE) recognises that all vulnerable adults and children have a right to be safe and protected from harm. We are committed to safeguarding vulnerable adults and children who participate in our services or programmes.

CSE's safeguarding policy is based on the six elements of the Safe Network Standards, produced by the National Safeguarding Unit for the Third Sector:

- **Staff and volunteers**
- **Child protection**
- **Dealing with bullying**
- **Avoiding accidents**
- **Recording and storing**
- **Working with others**

This policy applies to all CSE staff, volunteers, trustees, student placements, agency workers and sub-contractors when delivering CSE activities.

This policy is overseen by the Director of Finance & Operations. It is reviewed annually and forms part of the staff handbook, which is available to staff on the shared server and forms part of staff inductions. Staff are alerted to any revisions by email and through staff meetings.

Definitions

A **child** is recognised in UK law as any person under the age of 18. A **vulnerable adult** is a person aged 18 or over requiring community care services by reason of disability, age or illness and who is unable to take care of themselves or protect themselves against significant harm or exploitation¹.

Abuse is defined as the mistreatment by any other person or persons that violates a person's human and civil rights¹. Guidance issued by the NSPCC² and the Social Care Institute for Excellence (SCIE)³ recognises the following types of abuse in children and vulnerable adults:

- **Physical abuse** – unreasonable physical force resulting in pain, injury or impairment
- **Sexual abuse** – direct or indirect involvement in sexual activity that the person does not want, has been coerced into or has not consented to, taking account of the age of consent in the UK (16 years old), rising to 18 with adults in a position of responsibility for the child
- **Neglect** – failure of a person with responsibility for the charge, care or custody of a vulnerable adult or child to provide reasonable care (intentionally or unintentionally)
- **Emotional abuse** – actions or behaviour that have a harmful effect on emotional health or development, including threats, deprivation of contact, shouting, ignoring, cruelty, bullying (including online abuse), humiliation, coercion and undermining self-esteem
- **Financial abuse** – use of a person's assets without their informed consent or authorisation
- **Discriminatory abuse** – misuse of power that denies opportunity to some groups or individuals based on values, beliefs or culture
- **Institutional abuse** – mistreatment, abuse or neglect occurring when the routines, systems and regimes of an institution result in inadequate standards of care and poor practice.

¹ <http://www.safeguardingmatters.co.uk/the-new-disclosure-and-vetting-service/in-the-news/recent-cases-relating-to-vulnerable-adults/>

² [Spotting the signs of child abuse | NSPCC](#)

³ http://www.scie.org.uk/publications/elearning/adultsafeguarding/resource/2_study_area_3_4.html

Staff and volunteers

- Staff recruitment includes a face-to-face interview, uptake of references and ID checks.
- Volunteer recruitment (including trustees) includes a face-to-face interview and references.
- Subcontractors delivering relevant activities must demonstrate adequate procedures.
- Disclosure and Barring Service (DBS) checks are undertaken for staff and volunteers to comply with requirements for regulated activities under the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012:
 - DBS checks can only be legally made by an employer under certain conditions.
 - DBS checks are required for some areas of CSE's work, including the regular provision of advice or guidance to the same vulnerable adult, training, online forum management and overnight accommodation supervision for under 18s.
- Induction and training are provided for all new staff on CSE's policies and relevant knowledge for their role. Volunteers also receive appropriate induction and training for their tasks.
- All new staff are subject to a probationary period to ensure their suitability for their role.
- All staff are provided with regular supervision (formal and informal) that gives them an opportunity to raise concerns or issues with their line manager.
- CSE has an Equality, Diversity & Inclusion policy which addresses discriminatory abuse.

Child and vulnerable adult protection

- CSE has procedures in place for dealing with suspected abuse, and for dealing with accusations of abuse against staff or volunteers (see Annex). This includes procedures for referring concerns to the DBS or local authority.
- CSE staff and volunteers can confidentially report concerns to their line manager or volunteer supervisor, the Director of Finance & Operations or the Chief Executive.
- All staff and volunteers working with children or vulnerable adults are provided with adequate training and support in safeguarding during the course of their activities.

Dealing with bullying

- CSE's Equality, Diversity & Inclusion Policy outlines expected behaviours and our policy towards harassment. These standards of respect are also expected of our volunteers and participants of all ages in our supported programmes, and digression may result in the removal of opportunities to volunteer with or otherwise participate in CSE's programmes of activity.
- Our staff handbook outlines our policy on appropriate use of online facilities.
- CSE's Complaints Policy outlines how to report incidents of inappropriate behaviour by our staff, volunteers or subcontractors, and how these complaints will be handled.

Avoiding accidents

- CSE's Health and Safety Policy outlines our approach to risk, first aid and accident reporting.
- Written parental or guardian consent, medical/dietary needs and emergency contact details are obtained before children participate in our programmes where CSE has the lead responsibility for their welfare (e.g. outside of a school or similar setting).

Recording and storing

- CSE manages data in line with our Information Security and Data Protection Policy.
- We keep a record of face-to-face contact between our staff or volunteers and children or vulnerable adults, e.g. home visits, training sessions.
- Information that may be needed in an emergency (e.g. medical, emergency contact) is kept to hand during activities with children where CSE has the lead responsibility for their welfare.

Working with others

- CSE actively builds links with relevant partner agencies and is able to refer vulnerable people for further support if a need becomes apparent.

Annex: Safeguarding procedures

CSE's safeguarding procedures should be read alongside our Safeguarding policy. They comprise five parts:

1. Procedures for working with vulnerable adults
2. Procedures for working with children
3. Procedures for handling reported or suspected abuse
4. Procedures for handling accusations of abuse by CSE staff, volunteers or other affiliates
5. Provisions for supporting staff and volunteers

If the child or vulnerable adult is at risk of immediate and serious harm, you should contact the police. In all other circumstances you should follow the guidelines below.

Part 1: Procedures for working with vulnerable adults

CSE regularly gives advice to vulnerable adults, but the nature of our work with vulnerable adults does not automatically fall under the requirements for DBS checks under the Protection of Freedoms Act 2012. Where a project may require staff members to have regular contact with a vulnerable adult for provision of assistance, advice or guidance then a DBS check will be required.

When working directly with vulnerable adults without the presence of carers, CSE staff should ensure that they are working in pairs and have kept a record of their contact with the vulnerable person. At public outreach events that are not directly targeted at vulnerable people, and where staff are not liaising with vulnerable adults in private, a record of contact with individual vulnerable adults is not required.

Remaining procedures for work with vulnerable adults are to ensure CSE staff are not engaging with regulated activities which are not appropriate to their role (for example, as a result of situations arising during a home visit):

- You should not provide any direct healthcare assistance or counselling that extends beyond your role in understanding and empathising with a person's situation for the purposes of providing energy advice.
- You should not provide personal care to anyone, such as assistance with eating, drinking, washing, getting dressed, going to the toilet or caring for skin, hair or nails.
- You should not have any direct role in managing or handling a person's money, including paying bills or shopping for them.
- You should not provide transport for a vulnerable person (e.g. driving them somewhere).
- Any help that the vulnerable person requires that is outside the remit of your role should be referred to an appropriate service provider where appropriate.

The only exception is when a vulnerable adult is in immediate danger. In this type of situation, you should call 999 for ambulance or police assistance.

CSE's Director of Finance & Operations is responsible for ensuring that CSE's policy on working with vulnerable adults remains compliant with current legislation.

Part 2: Procedures for working with children

Indirect supervision

This is where CSE is responsible for leading an activity with children, but under the direct supervision of a teacher, youth worker, carer, other relevant professional, parent or guardian.

- The legally responsible organisation must have adequate safeguarding in place and must provide sufficient supervisors for the discipline and welfare of the group.
- When parents are involved with a group, the responsibility for the behaviour and discipline of the children or young people lies with them. This must be made clear before any activity starts.
- CSE staff should not be left in sole charge of children, but should at all times be accompanied by an appropriate representative of the legally responsible organisation.
- If you are placed in a position that falls below these requirements, you should:
 - Make clear to the host organisation that this is unacceptable and ask them to rectify this
 - If the issue continues, complete the activity as quickly as possible
 - Inform your line manager who will inform CSE's Director of Finance & Operations, who will write to the organisation concerned to formally report the incident and reiterate the safeguarding conditions under which CSE is able to work with the organisation.
- If the practice is repeated, CSE will suspend involvement with the organisation until they can meet the required standard. CSE will communicate this in writing to the organisation concerned.

If, on a regular CSE organised activity, CSE staff might come into contact with children or other vulnerable people, then these CSE staff must be briefed on any relevant procedures.

Direct supervision

This is where CSE has lead responsibility for the discipline, behaviour, safety and welfare of children.

- CSE staff should avoid taking direct supervisory responsibility for children except where absolutely necessary, or as part of a programme of work with young people which has been designed and managed to comply fully with safeguarding.
- In a school setting, CSE staff should only take sole responsibility for children if they are remaining on school premises, have appropriate teacher training qualifications, teaching experience and a DfES number, and have the permission of the Head Teacher.
- In other settings, CSE should ensure that appropriate actions have been taken to secure safety:
 - Written parental or guardian consent, medical/dietary needs and emergency contact details are obtained beforehand.
 - Information that may be needed in an emergency (e.g. medical, emergency contact) is kept to hand during activities with children.
 - Adequate supervision for under-18s is provided: for 13-18 year olds, this is 10 children to one adult; for 9-12 year olds, this is 8 children to one adult⁴.
 - Appropriate risk assessments are taken and followed for the activities involved, taking into account the age and maturity of the children involved.

In all settings, staff should:

- Be aware of the need to be vigilant in identifying cases of suspected abuse.
- If working in partnership with another organisation (e.g. a school), liaise with the relevant staff from the partner organisation(s) to ensure information on suspected abuse is passed to the relevant agencies.
- Make notes of any concerns and/or disclosures and store these in accordance with CSE policy and that of any partner organisation involved (e.g. school).

⁴ http://www.safenetwork.org.uk/help_and_advice/best_safeguarding_practice/pages/adult_children_ratios.aspx

Part 3: Procedures for handling reported or suspected abuse

CSE staff and volunteers are not responsible for diagnosing abuse. However, you have a responsibility to be aware of and alert to signs of abuse. It is important to keep an open mind and consider what you know about the vulnerable person and their circumstances. Any concerns should be noted and passed to the designated CSE staff member. Assessment for safeguarding purposes is not the same as an assessment for criminality.

CSE's Director of Finance & Operations and the Director of Household Energy Services are the designated staff members for supporting other CSE staff and volunteers in handling cases of reported or suspected abuse.

Signs of abuse

Signs of abuse in children⁵ may include:

- Young child talks of being left home alone or with strangers
- Appear not to have a close relationship with their parent
- Overly affectionate towards strangers or people they haven't known for very long
- Acts out excessive violence or aggression with other children or animals
- Lacks social skills
- Parents show little interest in child's performance or behaviour, or are dismissive and non-responsive to professional concerns
- Poor attendance or punctuality, or late being picked up
- Drinks alcohol regularly at a young age
- Talks of running away
- Shows challenging and disruptive behaviour
- Evasive or reluctant to share information
- Shows sexual behaviour that is inappropriate for their age
- Poor appearance and hygiene
- Physical injuries or untreated medical problems

Signs of abuse in adults⁶ may include:

- Physical injuries such as multiple bruising, fractures or burns
- Fear, depression or anxiety
- Unexplained weight loss
- Unexpected or unexplained change in behaviour
- Unexplained shortage of money
- Reluctance on the part of a person with responsibility for a vulnerable person's funds to provide basic food, clothes, etc.
- Lack of personal hygiene or disregard to surroundings (may be regarded as self-abuse)
- Evidence of controlling, coercive or threatening behaviour by another person who is in regular contact with the vulnerable adult.

⁵ <http://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

⁶ <http://www.tameside.gov.uk/socialcare/adultabuse/signs>

Disclosure

Where a disclosure is made by the individual, you should adhere to these guidelines:

Receive

- Don't promise confidentiality; recognise that you will have to tell someone.
- Listen to the person who wants to share the information with you, without displaying shock and disbelief. Accept what is being said.
- Reassure the individual, but be honest. Don't make promises you will be unable to keep.
- Ensure that what you say is appropriate to the age and stage of development of the child or young person or the mental capacity of the vulnerable adult.

React

- Only question the person to confirm what they have told you, and not to investigate any further. Leave that to the relevant agencies.
- Do not ask leading questions.
- Do not criticise the person(s) the individual is talking about.
- Do not ask them to repeat the disclosure to another worker.
- Explain to the vulnerable person what you are going to do next, and why.

Record

- Make brief notes as soon as possible, including the date, time, place, any noticeable non-verbal behaviour, and the words used by the child or vulnerable adult. In cases of physical abuse you should record on a diagram the position and appearance of any bruises or marks, if visible without removal/alteration of clothing. These notes should be stored by designated staff member.
- On indirectly supervised projects, both the legally responsible organisation and the employing organisation of any person involved must be informed.
- If you have reason to suspect that a school pupil is suffering or is likely to suffer significant harm, you should immediately inform the Head Teacher or Officer in Charge so that the school's own procedures for child protection may be implemented. The CSE designated member of staff should also be informed of this action.
- If you are unsure whether a concern is a safeguarding matter, you should talk to the CSE designated support member of staff who will seek advice from the appropriate authorities.
- It is important to record all discussion, any advice given and the action agreed. This includes decisions where the social worker does not intend to visit or regards the concern as a child welfare matter rather than a child protection matter. All records, notes and reports will be confidential, and stored by the designated CSE member of staff.
- Inform the CSE designated member of staff about the disclosure within 24 hours.
- Referrals made to a statutory agency about concerns for a child should be confirmed in writing within 48 hours. The designated member of staff is responsible for following this up.
- Any records will be kept for six years after the last contact with the client or for 10 years if allegations concern a member of CSE staff or volunteer.

Remember that the welfare of the vulnerable person is paramount, and must take precedence over any concerns about the loss of relationship which might ensue with a service user who has made allegations or who is suspected of abusing a child or vulnerable adult.

Historical abuse

A person may disclose abuse (either sexual or physical) which occurred in the past, such as during their childhood. This information needs to be treated in exactly the same way as a disclosure or suspicion of current child abuse. The reason for this is that the abuser may still represent a risk to children or vulnerable adults now. This information should be reported to Social Services.

Part 4: Procedures for handling accusations of abuse

All recruitment of staff will follow CSE recruitment procedures. Keeping to CSE procedures should ensure that CSE staff are safe. However, in the case of an allegation the following procedure should be followed:

- If a member of staff has an allegation made against them then they must be removed from the activity immediately.
- CSE's designated member of staff will inform Social Services and/or other appropriate authorities, which may result in advice to CSE on further action to be taken.
- CSE's disciplinary procedures may be started. The member of staff should be reassured that this does not imply any guilt, but is to protect them as much as the individual making the allegation.
- CSE staff should be aware that if they are involved, any subsequent investigation may extend to that individual's family.
- CSE staff should have access to counselling.
- Notification to the DBS (The Disclosure and Barring Service) may be required.

Part 5: Support to Staff and Volunteers

Staff training on safeguarding issues will take place:

- During induction as part of procedures for home visits or for working in schools
- During team meetings
- As part of case work reviews
- Ad hoc as required.

CSE's Director of Finance & Operations and the Director of Household Energy Services are the designated staff members for supporting CSE staff and volunteers in handling reported or suspected abuse, and will liaise with the appropriate authorities.

Abuse of children and vulnerable adults may cause distress to staff and volunteers, both because of the nature of the abuse and because of the potential response of families involved, who will be made aware through processing of the case of CSE's role in informing Social Services or the police of suspected abuse.

- CSE members of staff should have access to support and counselling. CSE will encourage and facilitate peer-to-peer support, support from line managers and will make arrangements for formal counselling when needed.
- Staff should be reminded of security arrangements for staff and premises if there is any reason to believe that CSE may be approached as a result of any reporting.