

# Career Connect POLICY DOCUMENT Safeguarding Policy

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## VERSION HISTORY

Ver	Date	Inits	Reason for change
3	Nov 12	DB	Protection of Freedoms Act, 2012
4	Apr 14	FSN	Into ISO9001 Format; Working Together 2013
5	Aug 14	FSN	To format v6, accepted subcontractor changes.
6	Sep 14	FSN	To format v7; Change GMCP to Career Connect
7	Jan 15	FSN	<ul style="list-style-type: none"> <li>Added e-safety officer to Responsibilities</li> <li>Added CSE and e-safety to policy statement</li> </ul>
8	Feb 15	FSN	Reviewed: No changes
9	Jul 16	FSN	Added Counter Terrorism & Security act 2015. Changed lead from FCSD to EPSD
10	13/11/17	VC	Reviewed and updated by consultant
11	07/08/18	FSN	Moved statement to be first item; added requirement for director to sign off safeguarding reports.
12	22/08/18	FSN	Updated as per ToR (15/08/18)
13	04/09/18	FSN	Added Regional Managing Direct (ANWC) as strategic lead. .

## STATEMENT OF POLICY

Safeguarding is everyone's business at Career Connect. Everyone has a duty to safeguard and promote the welfare of clients and practitioners. It is intrinsic to both promoting welfare and to the quality of the service provided.

Career Connect will endeavour to ensure that clients who directly or indirectly use the services provided by Career Connect are protected from harm. In pursuit of the commitment and in implementing the policy Career Connect will:

### **Policy and procedure**

- Create a safeguarding culture whereby any opportunities for abuse are identified and responded to timely
- Respond to any signs of abuse or neglect taking all allegations, suspicions and disclosures seriously

- Take appropriate action to ensure clients are kept safe and all disclosures are reported appropriately and in a timely manner
- Have systems and processes to respond to and monitor all safeguarding concerns

### **Practitioners**

- Follow safer recruitment guidelines when recruiting practitioners or engaging contractors.
- Ensure Career Connect's practitioners working with young people or with offenders in custody have enhanced DBS Clearance
- Ensure subcontractor practitioners working with adults have basic DBS Clearance
- Ensure all practitioners have the correct documents and training to work with Career Connect clients.
- Ensure all practitioners have access to safeguarding advice and guidance
- Provide appropriate guidance for practitioners, ensuring they are familiar with the signs and indicators of abuse and neglect in both children and adults, including specifically Child Sexual Exploitation (CSE)
- Recognise that practitioners could be at risk of harm from clients and the public

### **Avoiding Accidents**

- Ensure a safe environment for clients and practitioners
- Take all reasonable steps to ensure the health, safety and welfare of any client in contact with Career Connect
- Take all reasonable steps to prevent any staff member, persons working for us or member of the public from putting any vulnerable adult in a situation in which there is an unreasonable risk to their health and safety

### **Working with clients**

- Not abusing any client in contact with Career Connect
- Take all reasonable steps to prevent any staff member, persons working for us or member of the public from physically, emotionally or sexually abusing any client
- In respect of safeguarding individuals from radicalisation, we will work to the Prevent element of the government's Counter Terrorism Strategy, and where deemed appropriate seek external support for clients through referrals to the Channel Programme
- Promote e-safety to clients.
- Recognise that peer on peer abuse may take place and doing all we can to prevent this through education and appropriate behaviour management

### **Record keeping**

- Ensure that all incidents, including witnessed incidents, those arising from a disclosure or third-party allegation, concerns involving

practitioners and instances of suspected harm are recorded on the Career Connect Safeguarding Log.

### **Working with other agencies**

- Work in a multidisciplinary group to better support individuals and families
- Contribute to the work of safeguarding boards where applicable

This policy refers to all clients regardless of age, gender, ethnicity, disability, sexuality or religion

## **POLICY OWNER**

Leadership Safeguarding Committee

## **PURPOSE**

Career Connect, with its partners and subsidiaries (hereafter collectively called Career Connect), safeguarding policy has an overriding purpose to prevent harm to children and adults at risk. The policy is to cooperate with the local authority in responding to and/or causing any enquiries to be made regarding any reasonable concern of abuse or neglect. Career Connect policy is to participate in agreed plans that protect children and adults who have been harmed or may be at risk of harm.

The policy is integral to the charity's general duty of care towards clients, staff, volunteers and the public. To this end, the procedures and practice of Career Connect (including those governing recruitment, training, supervision, whistle blowing and other aspects of workforce management) will be consistent with relevant national and local guidance.

Within Career Connect this policy is supported by guidance and the procedures following:

- *General Safeguarding Procedure*
- *Safeguarding Serious Case Review/Serious Adults Review*
- *Safeguarding Log Policy and Procedure*

Procedures will be regularly reviewed, and practice monitored. The findings of such reviews and monitoring will be reported annually to the Trustees/Directors and to the Trustee Board. In addition to identifying any necessary changes to procedure, they will inform the Career Connect Staff Training and Development Plan.

## **SCOPE**

This policy applies to all aspects of the work of Career Connect. Its supporting procedures apply to all staff including permanent and temporary employees and all agency staff, casual workers, work experience students on placement, voluntary workers, contractors and consultants who work under a contract for services. For this policy the term 'Practitioner' will be used in place of all the

above staff descriptions, the term 'Career Connect' will be used in place of all organisational descriptions and 'Client' will be used to define all service users inclusive of children, young people and adults.

*Safeguarding policy and procedures come into effect when a Practitioner becomes aware of persons causing harm, risk of harm or engaging in relevant conduct<sup>1</sup>.*

*Practitioners are people in a position of trust (PIPOT) and as such are subject to the guidance in the Care Act 2014 in respect of any allegations (current or historical) regarding their own conduct in or out of work or that of their immediate family or social circle.*

## **AUTHORITY**

The legal imperative for this policy comes from:

### Human Rights Act, 1998

Schedule 1 of the Human Rights Act, 1998, defines human rights, including the right to life, prohibition of torture, prohibition of slavery and forced labour, and the right to liberty and security.

### Children

For full legislation see <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/england/legislation-policy-guidance/>

The primary statutory guidance is Working Together to Safeguard Children 2015

### Adults

The Care 2014 statutory guidance chapter 14 is primary  
<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1>

### Female Genital Mutilation Act 2003

### Safeguarding Vulnerable Groups Act 2006

Defines "regulated activities" when dealing with children & adults, and describes vetting & barring processes.

### Protection of Freedoms Act, 2012

Amends the Safeguarding Vulnerable Groups Act 2006 by redefining the regulated activities and vetting & barring processes. The aim is to reduce the number of Vetting and Barring referrals required to "common sense" situations. The new definition of regulated activity relating to adults no longer labels adults as 'vulnerable'. Instead, the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time.

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<sup>1</sup> *Relevant Conduct' as defined by the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012*

## Counter Terrorism and Security Act 2015

Schedule 3, Section 21 places a duty “to have due regard to the need to prevent people from being drawn into terrorism” (The Prevent Duty)

The Government has defined extremism in the *Prevent* strategy as: “vocal or active opposition to fundamental British values, including:

- democracy,
- the rule of law,
- individual liberty and
- Mutual respect and tolerance of different faiths and beliefs.”

Serious Crimes Act 2015 regarding controlling and coercive behaviour – modern slavery

<https://www.gov.uk/government/publications/statutory-guidance-framework-controlling-or-coercive-behaviour-in-an-intimate-or-family-relationship>

## **RESPONSIBILITIES**

### ***Trustees***

Career Connect trustees are responsible for ensuring that those benefiting from, or working with, their charity, are not harmed in any way through contact with it. They have a legal duty to act prudently and this means that they must take all reasonable steps within their power to ensure that this does not happen. It is particularly important where beneficiaries are vulnerable persons or children in the community. The Charity Commission<sup>2</sup> expects trustees to find out what the relevant law is, how it applies to their organisation, and to comply with it where appropriate. Charity Commission guidance can be found at <https://www.gov.uk/government/publications/safeguarding-children-and-young-people/safeguarding-children-and-young-people>

The website offers several sources of knowledgeable advice. All organisations, including charities, are expected to comply with the government inter-agency statutory guidance Working together to safeguard children, ‘unless exceptional circumstances arise’.

### ***The Audit & Risk Committee of the Career Connect Board***

A&R satisfies itself of the effectiveness of the safeguarding policy, procedures and process, instigates and agrees the actions required and reports to the Board.

The Audit Committee receives updates at every meeting of the Committee.

### ***The Chief Executive***

The Chief Executive has ultimate responsibility for Safeguarding within the Company.

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<sup>2</sup> <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

### ***Director***

Directors have a specific responsibility for reviewing and signing off any Serious Case Review, Individual Management Reviews, and Safeguarding Reports.

### ***Regional Managing Director – Achieve North West Connect***

The day to day Strategic Responsibility for safeguarding rests with the ANWC Regional Managing Director.

### ***E-Safety Officer***

The Assistant Director (Workforce) has the role of e-safety officer. In this regard they are responsible for the promotion of safety of Practitioners and clients whilst using electronic communications methods such as the internet, social media and e-mail.

### ***Compliance Officers***

Compliance Officers within the Career Connect are responsible for ensuring that the policies and procedures of sub-contractor organisations are consistent with their own organisations safeguarding policies and procedures and the relevant elements of this policy and its supporting procedures.

### ***Line managers***

Line managers within the Company are responsible for the day to day operational compliance with this policy and its supporting procedures. Subcontract managers are responsible for the application and compliance with their own safeguarding policy and supporting procedures.

### ***Business Development***

When new contracts are secured, these will be reviewed from a safeguarding viewpoint and any necessary adjustments made to policies and procedures.

### ***All Practitioners***

Everybody at all levels within Career Connect, its partners, subcontractors and subsidiaries have an obligation to apply this policy and its supporting procedures in their day to day work wherever appropriate.