

Safeguarding Policy	Version:	2.10
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1. Approval Record

Name	Role	Date
Rebecca Clarke	Head of People	1/8/20

2. Version History

Version	Date	Author	Description (nature of change/update)
0.1	1/6/2020	Rebecca Clarke	Initial Creation – Document design proposal
2.0	1/8/2020	Rebecca Clarke	Final version
2.1	15/1/2021	Rebecca Clarke	Annual review and version control update
2.2	20/9/2021	Rebecca Clarke	Added in safeguarding lead contact details
2.3	12/7/2022	Rebecca Clarke	Annual Review and version control update
2.4	6/12/2022	Anthony Melia	Updated to include introduction and purpose of the Safeguarding Working Group (SWG) and reference to the Prevent Action Plan (PAP)
2.5	15/3/2023	Anthony Melia	Full review, flow added, potential safeguarding risk sections added
2.6	15/09/2023	Anthony Melia	Role name changes and reference to Lone Working in Health and Safety Policy and SPaG check of the full policy.
2.7	17/01/2024	Anthony Melia	Rebranding and general updates
2.8	24/01/2024	Anthony Melia	SPaG review
2.9	09/05/2024	Anthony Melia	Roles and responsibilities changes
2.10	1/2/25	Rebecca Clarke	Annual Review and version control update, new salesforce guidance added

3 Introduction

This policy sets a framework for the expected standard of behaviour. We Are Group is committed to ensuring that a safe and suitable environment is provided for all users of our services, especially those who are considered adults at risk of harm, abuse, and neglect as well as children. We also look to protect our employees, customers, partners and supply chain.

Our safeguarding policy and associated policies are based on the following principles:

- The welfare of children, young people and vulnerable adults is the primary concern;
- All children, young people and vulnerable adults have the right to protection from abuse;
- It is the responsibility of experts to determine if abuse has taken place, but it is everyone's responsibility to report any concerns using the appropriate procedures outlined in this policy;

- All incidents of suspicious practice and allegations must be taken seriously and responded to swiftly and appropriately;
- Confidentiality must be upheld in line with all current legislation

3.1 Purpose

The aim of this policy is to:

- give a clear statement of We Are Group's approach to Safeguarding
- clarify the roles and responsibilities of all employees, partners, and supply chain
- provide the principle upon which our processes and procedures are built
- signpost to the associated policies and procedures which support this aim
- be clear about how We Are Group will embed the principles of Safeguarding through their associated policies and procedures
- outline the associated support that will be available

3.2 Scope

This policy applies to:

- Employees (individuals who work – or have applied to work for We Are Group either on a permanent, temporary, contractual, or voluntary basis).
- Supply chain and partners delivering who receive and/or are providing We Are Group services on our behalf.
- We Are Group service users or customers.
- External stakeholders and visitors who may have access to service users or data

Failure to adhere to this and associated policies will lead to disciplinary proceedings up to and including dismissal.

NB: When working on external sites/establishments all employees need to make themselves familiar with any policies relevant to the specific working location.

Some employee groups may have contractual requirements to undertake training or work to standards as stated within local Safeguarding Policies and Procedures. We Are Group will ensure that those employees who are subject to these additional requirements are aware of these responsibilities.

3.3 Monitoring

This policy provides an overarching framework, but it is recognised that specific service delivery may require additional guidelines and procedures. This policy will be reviewed annually, and all staff undergo mandatory annual training.

The policy will also be reviewed in the following circumstances:

- Changes in legislation and/or government guidance
- As a result of any other significant change or event.

4. Instruction

What is Safeguarding?

Safeguarding is the promotion of the well-being of children, young people and vulnerable adults and the detection, referral, and prevention of abuse.

What do we mean by “at risk” in Safeguarding terms?

A person becomes vulnerable to being harmed (whether it's someone who uses our services or an employee) if they are at risk of harm from others.

An Adult at risk is someone 18 or over who: An adult is defined as vulnerable when they are in receipt of a 'regulated activity'. This is defined by the following 6 broad categories:

1. Providing health care
2. Providing personal care
3. Providing social work
4. Assistance with cash, bills and/or shopping
5. Assistance in the conduct of a person's own affairs
6. Providing transportation of individuals where that transport is provided because of age, health, or disability

They are unable to look after their own well-being, property, rights, or other interests; and is at risk of harm (either from another person's behaviour or from their own behaviour); and have a disability, mental disorder, illness or physical or mental infirmity; these individuals are more vulnerable to being harmed than other adults.

All children and young people under the age of 18 are deemed to be at risk of harm or abuse, with some being more vulnerable than others.

We Are Group believe every child regardless of gender, ethnicity, disability, sexuality, or religion deserves to be comfortable and secure in their activities. Their carers, family or friends also need to feel sure that the people in charge of these activities are trustworthy, and responsible and will do everything they can to keep the child safe from harm.

For the context of this policy when we refer to a 'child' we are referring to any person under the age of 18, as defined by The Children Act 1989. When we refer to 'children' they may also be more commonly known to us as pupils, learners, customers, clients, attendees, participants, or carers; within this policy, we shall use the term 'customer' or 'child/children' to describe this group.

4.1 Our Duty of Care and 'Protection'

We Are Group have a duty of care to safeguard all children and adults at risk involved in our services and provisions from harm. All children have a right to protection, and the needs of children who may be particularly vulnerable must be considered. We Are Group will ensure the safety and protection of all children and adults at risk involved in We Are Group through adherence to this policy.

'Protection' is a central part of safeguarding and promoting welfare. It is the process of protecting individuals identified as either suffering or at risk of suffering significant harm as a result of abuse or neglect. In this sense, 'protection' refers to the procedures that come into force when there is a particular concern or incident. Protection is a statutory responsibility. Early help and intervention help to reduce the need for protection, but it is vital to have rigorous and clear procedures in place in case a problem arises. If a child or adult at risk suggests that they are being abused or if someone reports abuse or bad practices that could put a person's welfare at risk, these procedures must be understood and followed by everyone involved.

4.2 What is Abuse?

There are many different types of abuse, and they all result in behaviour towards a person that deliberately or unintentionally causes harm. It is a violation of an individual's human and civil rights and in the worst cases can result in death.

Types of abuse:

- Physical
- Neglect
- Institutional
- Sexual
- Discriminatory
- Psychological
- Financial

We believe that it is always unacceptable for any child or adult at risk to be subjected to harm, abuse, and neglect to experience abuse of any kind and we recognise our responsibility to safeguard the welfare of all children and adults at risk, by a commitment to practice which protects them.

Please see Appendix One: Safeguarding – Types of Abuse (in this policy) for further guidance

4.3 Our Commitment

To be considered trustworthy and responsible in keeping children and adults at risk of harm, safe from harm, abuse and neglect we will;

- avoid putting our employees, partners or supply chain in positions where abuse might be alleged and ensure they know exactly what to do should abuse be suspected.
- enable all our employees and those who work with us (including partners and supply chain) to make informed and confident decisions regarding safeguarding issues and take all suspicions and allegations of abuse seriously.
- recognise that anyone may become vulnerable at some stage in their life and that they may require extra support in the face of difficult situations such as ill health, bereavement, divorce, loss of income, or other challenges.
- ensure that all those involved in delivering our services and those receiving our services understand how to raise a concern and what to do
- We Are Group is committed to safeguarding and ensuring that all employee, partners and supply chain understand that when working with children or adults at risk they are operating in a position of trust. That brings a certain amount of responsibility.
- We Are Group ensure that all employees, partners and supply chain understand their role that keeps both the child and adult at risk and them safe.

4.4 Effective Safeguarding

Child Protection and the Safeguarding of Children and Vulnerable Adults is a statutory responsibility (more information is available in Appendix Two – Safeguarding – Relevant Legislation Explained)

Organisations should work together to safeguard children and at risk adults and be aware of the protective duties and responsibilities as outlined in all primary legislation (Children Act 1989 and Children Act 2004, Safeguarding of Vulnerable Groups Act 2006 etc.) and all other associated regulations and guidance as set out by the UK, Welsh, and Scottish Governments.

The key elements of effective safeguarding and child protection are:

- Ensuring we practice safe recruitment in checking the suitability of employees, partners and supply chain to work with children and at risk adults.
- Raising awareness of child-protection and abuse issues and equipping children and at risk adults with the skills needed to keep them safe.

- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting children who have been abused by their agreed child-protection plan.
- Establishing a safe environment in which individuals can learn and develop.

We recognise that because of the potential in-home contact with children and at risk adults, our employees, partners and supply chain are well-placed to observe the outward signs of abuse.

We Are Group will, therefore:

- Establish and maintain an environment where individuals feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in their school whom they can approach if they are worried.
- Ensure at risk adults know that there are support services available if they are worried.

Our organisation operates in England, Scotland and Wales and we will take account of guidance issued by the Department for Education (England), Welsh Government and Scottish Government accordingly to:

- Ensure we have a designated senior person for safeguarding who has received appropriate training and support for this role.
- Ensure we follow the guidelines of all relevant local children's or adults safeguarding boards and liaise with both them and any relevant Multi-Agency Safeguarding Hub (MASH) and any other relevant safeguarding authority or external agency, be they in England, Scotland, or Wales.
- Ensure every employee, partner, supply chain and the Executive Board knows the name of the designated senior person responsible for safeguarding and their role.
- Ensure all employees and subcontractors understand their responsibilities in being alert to the signs of abuse and responsibility for sharing any concerns with the designated senior person responsible for safeguarding.
- Keep written records of concerns about children or at risk adults, even where there is no need to refer the matter immediately.
- Develop and then follow procedures where an allegation is made against an employee, partner or supply chain.

We Are Group employees will endeavour to support customers through:

- The content of the learning and our general engagement with the customer.
- The ethos of our provision promotes a positive, supportive, and secure environment and gives individuals a sense of being valued.
- Liaison with other agencies that support the individual such as Children's Social Care, child and adult mental health services.

We recognise that:

- The welfare of our employees, Partners, supply chain, children, and adults at risk of harm, abuse and neglect is paramount.
- All children, and adults at risk of harm, abuse, and neglect, regardless of age, disability, gender, race, religious belief, sexual orientation, or identity, have the right to equal protection from all types of harm or abuse
- Working in partnership with our employees, partners, supply chain, adults, children, their parents, carers, and other agencies is essential in promoting their welfare.

4.5 Recruitment Procedures

We Are Group undertakes safe recruitment practices in all areas of the business. We adhere to the Disclosure and Barring Service Code of Practice and require all employees who will work in eligible roles to complete a DBS/Disclosure Scotland check. These practices are aligned with the specific legislative, statutory, and best practice guidelines for each business area.

4.6 Induction and Training

All new employees, partners and supply chain will receive an induction that covers their responsibilities and as part of their job roles, the company's responsibilities to them in respect of all aspects of their employment, training, development, equal treatment, health and safety and their responsibility to others, including safeguarding.

- Safeguarding training is mandatory for all staff and takes place annually. It forms part of We Are Group's formal training programme which is evaluated, monitored, and kept under review.
- Safeguarding training and acceptance of We Are Group's terms and conditions which lay out the expectation and requirements are mandatory for all partners and supply chain delivering on behalf of We Are Group.
- We Are Group employees, partners and supply chain will also have relevant health and safety procedures detailed to them as part of their induction.
- Some groups may have contractual requirements to undertake training or work to standards as stated within local Safeguarding Policies and Procedures. We Are Group will ensure that those employees, partners and supply chain who are subject to these additional requirements are aware of these responsibilities

4.7 Anti-Radicalisation and Extremism; Adhering to the Prevent Duty

At We Are Group we are committed to safeguarding the welfare of all our staff and customers. We recognise that as part of this process, safeguarding against radicalisation is important; we will work alongside other professional bodies and agencies to ensure that our staff and customers are safe from harm. Our policy regarding anti-radicalisation and commitment to the Prevent Duty can be found in the PREVENT Anti-Radicalisation and Extremism Policy.

4.8 Communication with Customers

We Are Group takes a whole organisation approach to safeguarding. This policy and associated documents are available to all service users on our website.

4.9 Ensuring a Safe Environment

We Are Group is committed to ensuring that a safe and suitable environment is provided for all users of our services, and employees, partners or supply chain working in those environments. We will ensure that a comprehensive risk assessment is undertaken by a competent person. We would ensure that individuals understand the need to conduct a dynamic risk assessment for all in-home appointments. The assessment will determine the potential risks to both customers, and the individual providing the service. Risk Assessments will be reviewed on an annual basis and in response to any incident.

Note: Please see the Lone Working section within We Are Group's Health and Safety Policy to ensure external working environments remain safe

4.10 Support for Employees

We Are Group recognises that working in situations that involve the abuse of a child or at risk adult can be very upsetting and stressful for employees. Employees may also feel their personal

safety may be put at risk or they have been placed under undue stress. Any concerns raised will be dealt with sensitively. Counselling outside the workplace is available through the Employee Assistance Programme (EAP).

4.11 Protection of Employees Who Report or Allege Abuse

Reporting abuse, whether or not it is found to be correct, is never an easy option. We Are Group's Whistleblowing Policy sets out support and protection for staff who report abuse in the workplace.

4.12 Dealing with Suspicions or Allegations of Abuse Made Against We Are Group Employees, Partners or Supply Chain

We Are Group is committed to investigating allegations made against employees, partners or supply chain. Any action taken will be in line with statutory guidance and with regard to the following internal guides and procedures:

- Disciplinary and Grievance Procedure
- Partner Services Agreement

If serious or suspected criminal offences appear to have been committed the allegation will be passed to the Senior Leadership Team for further action including the involvement of other organisations/adults responsible for the care of the child/vulnerable adult, including notification of the police.

We Are Group understands its obligations under the Safeguarding Vulnerable Groups Act (2006) and Protection of Freedoms Act (2012) to refer information to the DBS in cases where a person is dismissed or removed from working with children or adults at risk of harm, abuse, and neglect, (or would have been if the person had not left the business or resigned).

We Are Group is aware of the legislative and statutory guidance, local protocols, and best practices about managing allegations against employees, partners or supply chain, who work with children and adults at risk of harm, abuse, and neglect.

4.13 Managing Information and Confidentiality

All incidents or concerns will be handled sensitively; We Are Group will maintain confidentiality, with others informed on a "need to know" basis only. Safeguarding training will include guidelines for all employees, partners and supply chain when discussing the rights of confidentiality and safeguarding.

Any data, whether it be sensitive or otherwise will be handled in line with the General Data Protection Regulations (GDPR). See also the following Information Security Policies:

- IT Security and Social Media Policy
- Company Privacy Notice

Where the concern is appropriate to be disclosed to the client i.e., Housing Association; care and consideration will be given to protect confidentiality and contact will be made through the organisation's safeguarding team.

4.14 Photography, Videos and Other Creative Arts

Many activities of We Are Group will involve the taking of images which will often be used for publicity and/or to celebrate achievement. Employees need to be aware of the potential for these activities to be misused and should remain sensitive to any children who appear uncomfortable and should recognise the potential for misinterpretation.

Using images of children for publicity purposes will require the age-appropriate consent of the

individual concerned and their legal guardians. Images should not be displayed on websites, in publications or in a public place without such consent. It is recommended that when using a photograph, the following guidance should be followed:

- Ensure appropriate explicit consent has been granted (using a media consent form)
- If the photograph is used, avoid naming the child
- If the child is named, avoid using their photograph
- Establish whether the image needs to be retained for further use,
- Ensure appropriate measures are in place to securely store images and are only used by those authorised to do so

4.14 Responsibilities

Designated Safeguarding and Prevent Lead will be the individual holding the post of Head of People and Business Services.

This person:

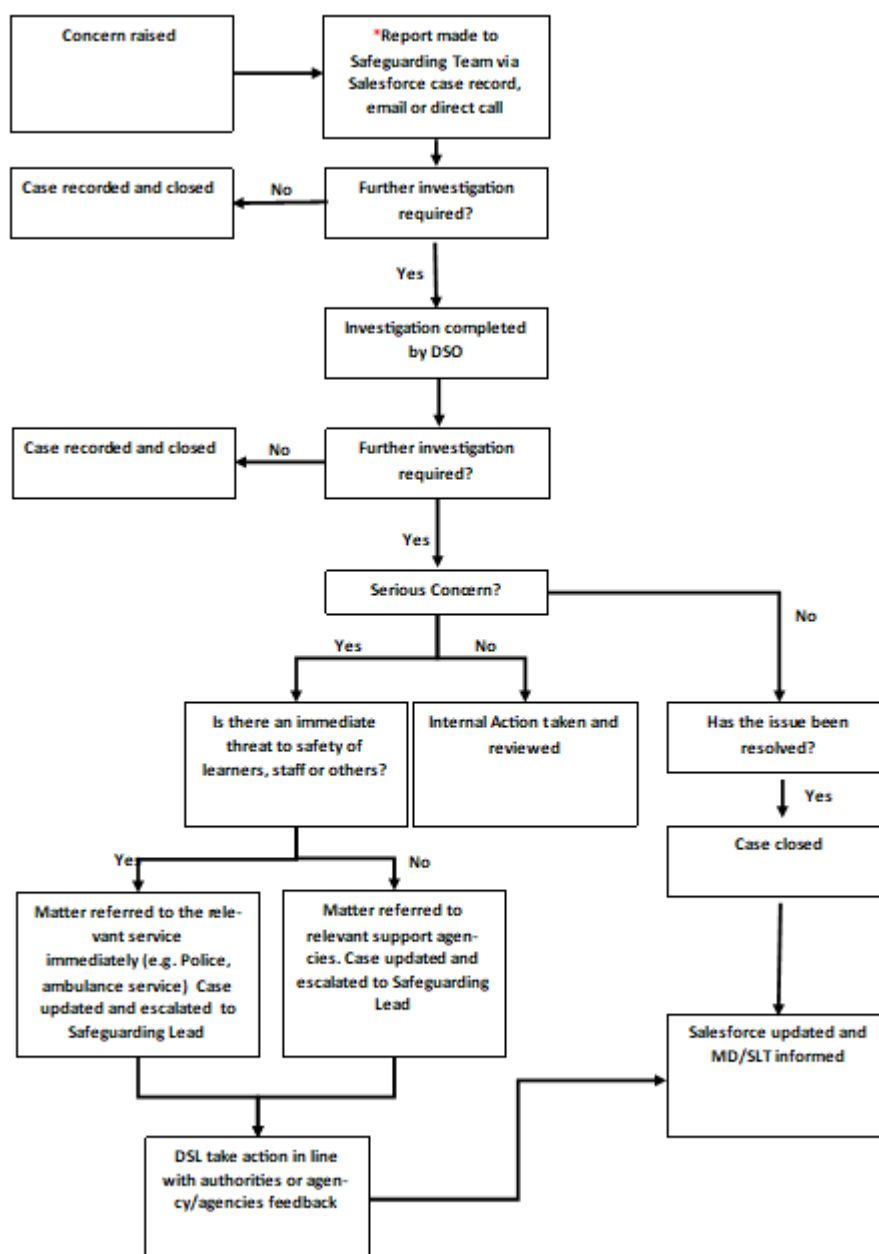
- is level 3 trained and they have a responsibility to keep updated on Safeguarding issues.
- has knowledge of reporting procedures for incidents should they occur.
- be the point of contact for advice and support if external reporting of a Safeguarding issue occurs.
- will look to form links to Local Authority Safeguarding Boards and ensure We Are Group's reporting procedures are aligned
- will support ongoing CPD training for Safeguarding and Prevent representatives

Contact details: Rebecca Clake, Head of People and Business Services is the Designated Safeguarding and Prevent Lead and be contacted at 03333 444019 Opt 7 is the main number for Safeguarding concerns and reporting incidents or safeguarding@wearegroup.com for emails.

It is not the role of the Designated Safeguarding and Prevent Lead, or We Are Group, to decide whether abuse (where applicable) has taken place or not. The responsibility of the Designated Safeguarding and Prevent Lead is to ensure that concerns are shared, and appropriate action taken.

5.0 Safeguarding Process Flow

All Safeguarding and Prevent referrals should be processed according to the below flow chart. All referrals should be sent to the safeguarding inbox: safeguarding@wearegroup.com or the DSL/DSO should be contacted on 03333 444019 Opt 7 (Rebecca Clarke)



6.0 Safeguarding and Mental Health Working Group

We Are Group has a Safeguarding and Mental Health Working Group that meets regularly to review the following:

- The number of Safeguarding Incidents and the overall nature of these – reviewed for patterns
- Policy updates
- Prevent Action Plan (quarterly)
- Staff Training and developments
- Local authority updates
- FE Prevent Coordinator updates

Appendix One: Safeguarding – Types of Abuse

This appendix aims to guide on the types of abuse, it is not an exhaustive list. Some of the content here is duplicated from the main body of the policy here for your information.

Discriminatory Abuse:

Discriminatory abuse includes psychological abuse, harassment and discrimination which is motivated

by a person's age, gender, disability, sexual orientation, race, cultural background, or religion.

Discrimination may be a motivating factor in other forms of abuse such as domestic violence or hate crime. Where the abuse or neglect is motivated by age, gender, sexual orientation, immigration status, race, religion, or disability; or occurs in a domestic violence situation; or is perceived as a Hate Crime: the abuse will be aggravated by these factors.

Discriminatory abuse can be in the form of personal or institutional discrimination. Personal discrimination is the prejudice of the individual, whereas Institutional discrimination is where systems and structures directly discriminate against potential or actual users of a service.

Signs and symptoms of Discriminatory Abuse can include:

- fearfulness expressed in the eyes, a person avoids looking at the potential abuser, flinching on approach
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- isolation / shunning by others
- threats or intimidation, bullying or shouting
- unexplained attacks on property or possessions
- continual favouritism to other people in preference to the individual
- internalising the discrimination to the extent that they express similar discriminatory views about others

Other types of Abuse which could be considered Discriminatory:

- **Hate Crimes:** any incident which constitutes a criminal offence which is perceived by the victim or any other person as being motivated by prejudice and hate.
- **Ageism:** discrimination based on age, especially against the elderly.

- **Gender Discrimination:** is a belief that one sex is superior to the other and that the superior sex has endowments, rights, prerogatives, and status greater than those of the inferior sex.
- **Homophobia:** discrimination against (fear or dislike of) homosexual people and homosexuality
- **Transgender Discrimination:** discrimination against people who are transgender
- **Religious Intolerance:** is either intolerance motivated by one's own religious beliefs or intolerance against another's religious beliefs or practices.
- **Racism:** the belief that all members of each race possess characteristics or abilities specific to that race, especially to distinguish it as inferior or superior to another race or races.
- **Disablism:** discriminatory, oppressive, or abusive behaviour arising from the belief that disabled people are inferior to others.

Physical Abuse

Physical Abuse is the physical mistreatment of one person by another which may or may not result in physical injury. Physical abuse includes assault, hitting, slapping, scratching, pushing, kicking, pinching, burning, force-feeding, misuse of medication or the withholding of medication or treatment, unwarranted or inappropriate restraint, forced isolation or inappropriate sanctions, unwarranted or unauthorised deprivation of liberty, false imprisonment or abduction, rough handling causing injury, or any injury not fully explained by the history given.

Signs and symptoms of Physical Abuse can include:

- unexplained bruises or welts on body, including face, lips, mouth, body, arms, back, buttocks, thighs
- bruises in various stages of healing, clusters forming regular patterns, reflecting the shape of an article or finger marks
- unexplained burns, especially on soles, palms and back, immersion burns, rope burns, electric appliance, or carpet burns
- unexplained fractures to any part of the body, especially if in various stages of healing, multiple or spinal injuries
- unexplained lacerations or abrasions to the mouth, lips, gums, eyes, external genitalia
- recoiling from physical contact or flinching
- malnutrition – rapid or continuous weight loss, insufficient supply of food on premises, dehydration, complaints of hunger
- lack of personal care, inadequate or inappropriate clothing, inadequate heating
- untreated medical problems
- unmanaged urinary/faecal incontinence
- signs of medication misuse such as drowsiness
- use of furniture and other equipment to restrict movement other types of Abuse which could be considered:
- **Domestic Violence:** any incident, or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been intimate partners, or family members regardless of gender or sexuality;
- **Forced Marriage:** a marriage conducted without the valid consent of one or both parties where duress is a factor. Forced Marriage is a violation of internationally recognised human rights and contrary to the Matrimonial Causes Act 1973;

- **‘Honour’ Based Violence:** is an incident or crime carried out to protect or defend the honour or ‘izzat’ of the family or community. This type of violence can be distinguished from other forms of violence as it is often committed with some degree and/or collusion from the family and/or community. Honour based violence includes acts of harassment, assault, imprisonment, unexplained death (suicide), forced pregnancy/abortion and in some cases murder. The family may perceive that the person has acted inappropriately and dishonoured the family and community. Consequently, the violence carried out is to punish them for this. For more information about honour-based violence visit Karma Nirvana’s website www.karmanirvana.org.uk
- **Environmental Abuse:** includes depriving someone of their liberty, sustained restrictions on a person’s freedom of movement as a result of the physical environment the person is in, culture of the environment or institution. It can also mean a child living without expressions of love, living in unsuitable/unclean accommodation.

Sexual Abuse

Sexual abuse is the involvement of individuals in sexual activities to which they have not had the freedom and capacity to give their informed consent, before and during the act, and/or may not fully comprehend. These acts include rape and attempted rape, sexual assault by penetration, sexual assault, abuser touching the victim’s body for their own gratification, indecent exposure, non-contact abuse (pornography), and sexual harassment, causing or inciting a person to engage in sexual activity without their consent. The use of social media and the internet has introduced ‘cyber’ sexual abuse such as ‘sexting’ and unauthorised sharing of sexual images.

Signs and symptoms of sexual abuse can include:

- Full or partial disclosure or hints of sexual abuse
- Signs of depression, stress
- Recoiling from physical contact
- Unusual difficulty in walking and sitting
- Sexually transmitted disease, urinary tract / vaginal infections
- Love bites, bruises or finger marks on thighs or arms
- Significant change in sexual behaviour, language, or outlook
- Fear of males or females
- Pregnancy in a person who is not able to consent
- Worries over social media content and sharing of personal content (see Cyber

Abuse) Other types of Abuse which could be considered Sexual:

- **Female Genital Mutilation:** FGM (more commonly known as female circumcision) is a practice with roots in religious communities in Asia, Africa, and the Middle East. It is against the law in the United Kingdom.
Victims of FGM are likely to come from a community that is known to practice it but the children or young persons at risk may not yet be aware of the practice or that it may be conducted on them – sensitivity should be shown towards the child or young person if you have to approach the subject. If any We Are Group staff encounter this practice, they should contact the Designated Safeguarding Lead immediately.
- **Sexual Exploitation:** Sexual exploitation of young people and vulnerable adults involves exploitative situations, contexts, and relationships where the vulnerable person receives ‘something’ (e.g., food, accommodation, drugs, alcohol, SIM cards and mobile phones, cigarettes, affection, gifts, money) or perceived friendship/boyfriend as a result of them

performing, and/or others performing on them, sexual activities.

Psychological / Emotional Abuse

Psychological or emotional abuse is an action or neglect by a person which impairs the psychological well-being of another person. This results from being repeatedly made to feel unhappy anxious afraid humiliated or devalued by the actions or inactions and/or attitudes of others and includes emotional abuse, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. People who use social media can be at risk of being humiliated or abused 'online'

Signs and symptoms of Psychological/Emotional abuse can include:

- Fearfulness expressed in the eyes, avoids looking at the caregiver, flinching on approach
- Ambivalence to carer
- Emotional withdrawal
- Sleep disturbance
- Low self-esteem
- Unexplained fear or defensiveness
- Threats or intimidation, bullying or shouting
- Significant pressure on a person to commit criminal acts
- Threat to abandon a person or put them "away"
- Promises which are not kept
- Few visitors, phone calls or outings
- Locking the person in at home, or in a car
- Significant community pressure for example anti-social behaviour
- Withdrawing from online or reality social groups (see Cyber Abuse)

Other types of Abuse which could be considered Psychological:

- **Anti-Social Behaviour:** acting in a manner that caused or was likely to cause harassment alarm or distress to one or more persons not of the same household as the defendant.
- **Discriminatory Abuse:** as described above
- **Online Abuse:** the use of technology and social networking sites to threaten, bully, harass, groom for exploitation, stalk, pose risks to personal safety and well-being or discriminate against an adult at risk. This could be through the use of a PC, laptop, tablet, mobile phone, gaming console or television with internet access. Threats can come through content, contact, and conduct. This includes text messages, phone calls, pictures, video clips, emails, chat room messages, instant messaging, and websites. Signs and symptoms can include spending long periods online, secrecy about a mobile phone and/or computer, withdrawal from social contact, depression, mood swings, unexplained gifts, sleep disturbance and self-harming.

Financial or Material Abuse

Financial abuse is the misappropriation of an individual's funds, benefits, savings, assets etc. or any other action that is against the person's best financial interests. This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, denying access to money, or the misuse or misappropriation of property, possessions, or benefits.

Signs and symptoms of Financial/Material Abuse can include:

- Unusual or inappropriate bank activity
- A power of Attorney is obtained when a person is unable to comprehend

- Recent change of deeds or title of the house
- A person lacks belongings or services which they can clearly afford
- Recent acquaintances expressing sudden or disproportionate affection for a person with money or property
- The carer asks only financial questions of the worker, does not ask questions about care; withholding money
- The person managing financial affairs is evasive or uncooperative.

Neglect and Acts of Omission

Neglect is the deliberate withholding OR unintentional failure to provide appropriate and adequate care and support. Section 44 Mental Capacity Act 2005 states “Anyone who has a duty of care to a person who lacks capacity is guilty of an offence if they deliberately or recklessly ill-treat that person or if they wilfully neglect that person.” It does not matter whether the behaviour was likely to cause, or caused, harm or danger to the victim's health. Wilful neglect usually means that a person has deliberately failed to carry out an act they knew they had a duty to do.

Signs and Symptoms of Neglect and Acts of Omission can include:

- The physical condition of the person is poor
- unexplained or untreated deterioration in health and well-being, including not seeking appropriate medical attention
- Inadequate heating or lighting
- Poor personal hygiene
- Malnutrition – loss of weight
- Dehydration
- Demanding food or drink
- Pressure sores
- Inconsistent or reluctant contact with health or social agencies
- Lack of social support and/or refusal to arrange access to callers/visitors
- Inappropriate, old, or shabby clothing, or being kept in night clothes during the day
- Sensory deprivation, not allowed to have hearing aid, glasses or other aids to daily living
- Accumulation of medication, or prescriptions not being collected from the pharmacy
- Increased number of incidents or accidents e.g., falls or physical altercations with others, which appear to have resulted from a lack of supervision both inside and outside of the home environment.

Other forms of abuse or safeguarding risks:

- **Substance abuse:** Substance abuse refers to the harmful or hazardous use of psychoactive substances such as alcohol, drugs, and other addictive substances that can lead to physical, mental, and social problems for the individual using them, as well as potentially causing harm to others.
- **Child trafficking:** Child trafficking is the recruitment, transportation, transfer, harbouring or receipt of children for the purpose of exploitation. This may involve the use of force, coercion, deception, or other forms of exploitation, such as sexual exploitation, forced labour, or removal of organs.
- **Cyber Bullying:** Cyberbullying refers to the use of technology, such as the internet, social media, or mobile phones, to harass, intimidate, or harm someone. This can take many forms, such as sending threatening or abusive messages, spreading rumours or lies online, posting embarrassing or sensitive information without permission, or impersonating someone online

to damage their reputation. Cyberbullying can have serious consequences for the victim, including emotional distress, social isolation, and even physical harm.

- **Online Grooming:** Online grooming refers to the process by which an adult builds a relationship of trust and emotional connection with a child or young person online, intending to sexually abuse them. Adults may use social media platforms, chat rooms, or online gaming to communicate with the child and gradually gain their trust, often by pretending to be someone else or by offering them attention, gifts, or other forms of positive reinforcement. The grooming process can involve the sharing of sexual images or explicit messages and may eventually lead to offline sexual contact. Online grooming is a serious form of child sexual exploitation and is considered a criminal offence in many countries, including the UK.
- **Sexting:** Sexting is the act of sending or receiving sexually explicit messages, images, or videos via digital devices, such as smartphones, computers, or tablets. Sexting can involve consensual exchanges between adults, but it can also involve minors who may not fully understand the potential consequences of sharing such content. Sexting involving minors can be a form of child sexual abuse and is considered a safeguarding issue, as it can expose young people to risks such as cyberbullying, harassment, exploitation, and online grooming. Moreover, sharing explicit images of minors is illegal and can result in criminal charges.
- **Mental Health:** Mental Health refers to the well-being of individuals with regard to their emotional and psychological state, and it is important to identify and address mental health issues to prevent harm or neglect.
- **Gang Violence:** Gang violence can pose significant risks to the safety and well-being of young people who are involved in or affected by it. Young people who are involved in gangs may be at risk of harm from rival gangs, as well as from their gang members who may use violence to maintain their power and control. Gang involvement can also lead to criminal activity, exploitation, and abuse, including sexual exploitation, drug trafficking, and human trafficking.
- **County Lines:** County lines is a term used to describe the involvement of gangs and criminal networks in the transportation and sale of illegal drugs from urban areas to smaller towns and rural areas in the UK. The term "county lines" refers to the dedicated mobile phone lines that are used by the gangs to facilitate drug trafficking and exploitation. Young people, including children and vulnerable adults, are often recruited and coerced into trafficking drugs across county lines, and they may also be subject to other forms of exploitation, such as sexual exploitation, modern slavery, or involvement in other criminal activities. County lines is a serious issue from a safeguarding perspective because it can expose young people to risks of harm and exploitation, including physical violence, emotional and psychological abuse, and neglect.
- **Modern Slavery:** Modern slavery refers to the exploitation of people for personal or commercial gain, using tactics such as coercion, deception, or force. It is a serious violation of human rights and can take many forms, such as forced labour, human trafficking, domestic servitude, and sexual exploitation. Modern slavery can occur in a variety of settings, including factories, farms, construction sites, domestic households, and sex industries.

Extremism and Radicalisation

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people, and families from violent extremism. There is a recognised threat from extremist groups attempting to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and

leaves them vulnerable to future radicalisation.

We Are Group values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Individuals have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm to others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. We Are Group is clear on its legislative and moral duty to view exploitation and radicalisation as a safeguarding concern and act accordingly.

Signs and Symptoms of Extremism or Radicalisation can include:

- being in contact with extremist recruiters;
- accessing violent extremist websites, especially those with a social networking element;
- possessing or accessing violent extremist literature;
- using extremist narratives and a global ideology to explain personal disadvantage;
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations; and
- significant changes to appearance and/or behaviour;
- experiencing a high level of social isolation, resulting in issues of identity crisis and/or personal crisis.

We Are Group tracks key developments internally and externally and uses an internal Prevent Action Plan to ensure that all training is delivered, systems are in place and policies reflect national, regional, local, and organisational priorities.

Appendix Two: Safeguarding – Relevant Legislation Explained

Safeguarding Vulnerable Groups Act 2006 & Protection of Freedoms Act 2012

In response to recommendation 19 of the Richard Inquiry Report into child protection procedures following the Soham murders, new arrangements for people whose jobs and voluntary work bring them into contact with children and vulnerable adults (previously referred to as the Vetting and Barring Scheme) was phased in from October 2009 under the Safeguarding Vulnerable Groups Act.

In 2011 the Vetting and Barring Scheme was reviewed and one of the key recommendations of the review was to abolish the registration scheme as recommended under the SVGA and to form a new body combining the criminal record checking services and the barring services together. Other key recommendations were to scale back eligibility-enhanced criminal records checks. Following on from that in 2012 the ISA and CRB merged under the provisions of the Protection of Freedoms Act (2012) to form a new body called the Disclosure and Barring Service (DBS).

The DBS are responsible for:

- processing requests for criminal records checks
- deciding whether it is appropriate for a person to be placed on or removed from a barred list
- placing or removing people from the DBS children's barred list and adults' barred list for England, Wales, and Northern Ireland

The Disclosure and Barring Service (DBS) issues criminal record certificates for specific positions,

professions, employment, offices, works, and licenses included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.

Types of DBS check available

- **Standard checks** – To be eligible for a standard-level DBS check, the position must be included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.
- **Enhanced checks** – To be eligible for an enhanced level DBS check, the position must be included in both the ROA Exceptions Order and in the Police Act 1997 (Criminal Records) Regulations.
- **Enhanced checks with children's and/or adult's barred list check(s)** – To be eligible to request a check of the children's or adult's barred lists, the position must be eligible for an enhanced level DBS check as above and be specifically listed in the Police Act 1997 (Criminal Records) Regulations as able to check the barred list(s).

The Rehabilitation of Offenders Act (1974)

Anyone who has been convicted of a criminal offence and received a sentence of not more than 2.5 years in prison benefits as a result of the Act if they are not convicted again during a specified period otherwise known as the 'rehabilitation period'. The length of this period depends on the sentence given for the original offence and runs from the date of the conviction. If the person does not re-offend during this rehabilitation period, they become a 'rehabilitated person', and their conviction becomes 'spent'.

Custodial sentences of more than 2.5 years never become 'spent'. There are exceptions to this Act. Occupations with duties involving "substantial, unsupervised access on a sustained or regular basis" to children and/ or vulnerable adults, are excepted from the Act. Application for work in such regulated positions requires a full declaration and a subsequent disclosure check to identify spent and unspent convictions. Full details of all excepted occupations are noted in:

- The Rehabilitation of Offenders Act 1974 (Exceptions Order) 1975)
- The Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) (No2) Order 2001

It must be stressed that We Are Group is committed to combating social exclusion and is in no way mandating or encouraging the exclusion of individuals purely because they have an unspent criminal conviction. While some individuals are likely to be unsuitable because of the nature and seriousness of their offences, there are no blanket bans. Rather, the best way to determine whether an individual is a risk is by discussing their offences and their attitudes to those offences with them. Decisions will not be made without giving individuals the opportunity to discuss their offences.

Protection of Vulnerable Groups (Scotland) Act 2007 (PVG)

A separate but aligned scheme has been set up in Scotland under the Protection of Vulnerable Groups (Scotland) Act 2007. Anyone included on a Barred List in Scotland will also be barred from working with children and vulnerable adults across the UK.

The Scottish scheme dovetails with the scheme established by the Safeguarding Vulnerable Groups Act 2006 for England, Wales, and Northern Ireland. The UK Government and Scottish Government are seeking to avoid cross-border loopholes but recognise the need for distinct provisions in each jurisdiction. <http://www.scotland.gov.uk/Publications/2007/11/01111737/2>

Implementation in Scotland is built on the experience of operating the Protection of Children (Scotland) Act 2003 ("the 2003 Act") and existing disclosure arrangements. A distinct Scottish

scheme also allows more flexibility in responding to Scottish circumstances and priorities and ensures appropriate accountability to the Scottish Parliament.

The Police Act 1997

This act contained the provision to set up the Criminal Records Bureau for England and Wales.

Under this act it is a criminal offence for an employer to:

- Not check an employee working with children or vulnerable adults.
- Give a job to someone inappropriate to work with children or vulnerable adults when they know this to be the case.

The Protection of Children Act 1999

Under this act, childcare organisations (defined as those that are ‘concerned with the provision of accommodation, social services or health care services to children or the supervision of children’) must make use of the Disclosure Service in their recruitment and reporting processes and urges other organisations working with children to also do so.

Criminal Justice and Court Services Act 2000

This act covers Disclosures and child protection issues. It contains the list of convictions that bar offenders from working with children in ‘regulated positions’.

These types of ‘regulated positions’ are defined in this act and include:

- Any employment in schools, children’s homes, or daycare premises where children are present.
- Caring for, training, supervising, or being in sole charge of children
- Unsupervised contact with children.
- Other positions which give the kind of access or influence which could put children at risk if held by a disqualified person (e.g., management committee members).

Care Standards Act 2000

A CRB disclosure is required for most roles in organisations providing care or health services regulated under this act. This act also sets out the Protection of Vulnerable Adults scheme. (NB: CRB has now been replaced by DS/DBS).

The POVA or Protection of Vulnerable Adults scheme was launched in 2004 by the Department of Health and the National Assembly for Wales.

The Children Act 1989

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

There are no absolute criteria on which to rely when judging what constitutes significant harm, but consideration should be given to the following:

- The severity of ill-treatment which may include the degree and extent of physical harm, including, for example, impairment suffered from seeing or hearing ill-treatment of another
- The duration and frequency of abuse and neglect.
- The extent of premeditation.

Child abuse and neglect is a generic term encompassing all ill-treatment of children including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child’s health or development. Children may be abused or neglected

through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting by those known to them or, more rarely, by a stranger.

To understand and establish significant harm, it is necessary to consider:

- the family context
- the child's development within the context of their family and wider social and cultural environment
- any special needs, such as a medical condition, communication difficulty or disability that may affect the child's development and care within the family
- the nature of harm, in terms of ill-treatment or failure to provide adequate care
- the impact on the child's health and development
- the adequacy of parental care

It is important always to take account of the child's reactions, and his or her perceptions, according to the child's age and understanding.

Children's Act 2004

The Children's Act 2004 aims to improve and integrate children's services, promote early intervention, safeguard, and promote children's well-being, provide strong leadership, and bring together different professionals in multi-disciplinary teams to achieve positive outcomes for children and their families. Local authorities are given a lead role in securing the co-operation of partners in setting up children's trust arrangements and the Act allows some flexibility in how these are structured and organised.

The Act takes a child-centred approach and includes universal as well as targeted and specialist services. Part of the aim of integration of services, plans and information is to enable children's needs to be identified early to allow timely and appropriate intervention before needs become more acute.

Local authorities are now specifically required to establish cooperative partnership working arrangements to improve the well-being of children. Partnerships will range from joint commissioning to single-service partnerships, to the full integration of social care, education, and some health services. County councils and single-tier authorities are the designated Children's Services Authority (CSA) with responsibility for ensuring that the Act is implemented locally. The main relevant measures of the Act include:

Section 10 - A duty to cooperate to improve the well-being of children

This Section of the Act gives local children's services authorities a lead role in securing the cooperation of partners in setting up arrangements to improve the well-being of children in the authority's area in relation to the five outcomes as indicated in the introduction.

The relevant partners specified in the Act have a duty to cooperate with the children's services authority in the making of any such arrangements to improve children's well-being. These partners include the police, strategic health authorities and PCTs for the area and district and borough councils. The concept of well-being covers physical and mental health and emotional well-being, protection from harm and neglect, education training and recreation, contribution to society and social and economic well-being. Arrangements for cooperation must consider the importance of parents and carers in improving the well-being of children.

Section 11 - A duty to safeguard and promote the welfare of children and young adults

This duty requires all agencies with responsibilities towards children and young adults and their functions with regard to the need to safeguard and promote the welfare of children. They must also ensure that anybody providing services on their behalf must do the same. The purpose of this duty is that agencies give appropriate priority to safeguarding children and share concerns at an early stage to encourage preventative action. The organisations are, in England: children's services authorities, district councils, Strategic Health Authorities, PCTs, NHS trusts, police, probation, youth offending teams, governors of prisons or secure training centres.

Working Together to Safeguard Children, 2015

This applies to England only Working Together sets out how organisations and individuals should work together to safeguard and promote the welfare of children in accordance with the Children Act 1989 and the Children Act 2004. All practitioners working to safeguard children must understand fully their responsibilities and duties as set out in primary legislation and associated regulations and guidance

Keeping Children Safe in Education, 2015

This guidance replaces Safeguarding Children and Safer Recruitment in Education (December 2006). This is statutory guidance from the Department for Education issued under Section 175, Education Act 2002, the Education (Independent School Standards) (England) Regulations 2010 as amended by SI 2012/2962 and the Education (Non-Maintained Special Schools) (England) Regulations 2011. Schools and colleges must have regard for it when carrying out their duties to safeguard and promote the welfare of children. The procedures for Managing Allegations against staff are also contained within this guidance.

Social Services and Well-being (Wales) Act 2014

This applies to Wales only. This Act came into force on 6th April 2016. The Act provides the legal framework for improving the well-being of people who need care and support, and carers who need support, and for transforming social services in Wales.
<https://socialcare.wales/hub/sswbact>

All Wales Child Protection Procedures Review Group

The All Wales Child Protection Procedures are an essential part of safeguarding children and promoting their welfare. The common standards they provide guide and inform child protection practice in each of the Local and Regional Safeguarding Children Boards across Wales. They outline the framework for determining how individual child protection referrals, actions and plans are made and carried out. <https://socialcare.wales/hub/sswbact>

The Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 makes public bodies listed in the Act think more long-term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach. The Act makes those bodies listed carry out their tasks in a sustainable way. The Act also establishes Public Services Boards (PSBs) for each local authority area in Wales. Each PSB must improve the economic, social, environmental, and cultural well-being of its area by working to achieve the well-being goals. Furthermore, the Act established a Future Generations Commissioner for Wales, whose role is to act as a guardian for the interests of future generations in Wales and to support the public bodies in the Act to work towards the well-being goals. <http://gov.wales/topics/people-and-communities/people/future-generations-act>

Prosperity for all – the National Strategy

The Welsh Government's well-being objectives (2017) This document sets out the aims of the Welsh government and provides clarity for partners about the changes the Welsh Government

wants to make in Wales. It also details how the Welsh Government wants the government and delivery partners to be part of a new approach to delivery priorities. There are twelve well-being objectives (these replace the initial objectives set out in November 2016). These objectives are integral to the Welsh Government's strategy, set out the areas where the Welsh Government can make the greatest contribution to the goals and provide the basis for strong partnerships with others. Prosperity for all – the national strategy <http://gov.wales/programmeforgovernment>

Appendix 3 – Behaviour Code for Adults Working with Children or Vulnerable Adults

When working with or for children, young people, and vulnerable adults, you are acting in a position of trust. You are likely to be seen as a role model and must act appropriately.

Responsibilities

You are responsible for:

- Prioritising the welfare of children, young people, and vulnerable adults
- Provide a safe environment for children, young people, and vulnerable adults.
- Having a good awareness of issues to do with safeguarding and child protection and acting when appropriate.
- Following We Are Group principles, policies, and procedures
- Staying within the law at all times
- Modelling good behaviour for children, young people, and vulnerable adults to follow
- Challenging all unacceptable behaviour and reporting any breaches of the behaviour code to the Designated Safeguarding and Prevent Lead
- Reporting all allegations/suspicions of abuse following our reporting procedures. This includes abusive behaviour being displayed by an adult or child and directed at anybody of any age.

Rights

You should:

- treat children, young people, and vulnerable adults fairly and without prejudice or discrimination
- understand that children, young people, and vulnerable adults are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems between yourself and others, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Relationships

You should:

- Promote relationships that are based on openness, honesty, trust, and respect
- Avoid favouritism
- Be patient with others
- Use special caution when you are discussing sensitive issues with children, young people, or vulnerable adults
- Ensure your contact with children, young people and vulnerable adults is appropriate and relevant to the work of the project you are involved in
- Ensure that whenever possible, there is more than one adult present during activities with children, young people, and vulnerable adults.

- If a child, young person, or vulnerable adult specifically asks for or needs some private time with you, ensure other staff or volunteers know where you and the individual are.

Respect

You should:

- Listen to and respect children, young people, and vulnerable adults at all times
- Seriously, actively involving them in planning activities wherever possible
- In some cases, it may be necessary to break confidentiality in order to follow child protection procedures; if this is the case it is important to explain this to the child or young person at the earliest opportunity.

Unacceptable Behaviour

When working with children, young people, and vulnerable adults, you must not:

- Allow concerns or allegations to go unreported
- Take unnecessary risks
- Develop inappropriate relationships with children, young people, and vulnerable adults
- Make inappropriate promises to children, young people, and vulnerable adults
- Engage in behaviour that is in any way abusive. This includes having any form of sexual contact with a child, young person, or vulnerable adult.
- Let children, young people and vulnerable adults have your personal contact details (mobile number, email, or address) or have contact with them via a personal social media account
- Act in a way that can be perceived as threatening or intrusive
- Patronise or belittle children, young people, and vulnerable adults
- Make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children, young people and vulnerable adults.