

Safeguarding Vulnerable Groups Policy

CONTENTS

- 1. REVISION/REVIEW SHEET**
- 2. PURPOSE**
- 3. SCOPE**
- 4. POLICY DETAIL**
- 5. REVIEW OF DECISION**
- 6. EQUALITY AND DIVERSITY**
- 7. DEFINITIONS AND ACRONYMS**
- 8. REFERENCES**
- 9. RECORDS**
- 10. REVIEW**

1. REVISION/REVIEW SHEET

Issue	Brief Description of Reason for Change	Document Owner	Date Issued
2	GDPR, and to comply with Welsh Government Guidance	Enid Roberts	September 2018

1. PURPOSE

- 1.1. Safeguarding is about protecting children and adults from abuse or neglect and educating those around them to recognise the signs and dangers.
- 1.2. The purpose of this policy is:
 - to set out how Cartrefi Cymunedol Gwynedd (CCG) deals with Safeguarding Vulnerable Groups which includes children and vulnerable adults at risk.
 - give a clear definition of the term vulnerable groups, abuse and neglect.
 - ensure consistency in recognising, reporting and responding to issues of safeguarding.
- 1.3. CCG recognizes its responsibility to safeguard vulnerable groups from harm. The overall aim of this policy is to protect and promote the welfare of all vulnerable groups.
- 1.4. This policy supports and reinforces CCG policies listed in section 8 and existing legislation and government guidance as embodied in the Safeguarding Vulnerable Groups Act 2006, the All Wales Child Protection Procedures 2008, the All Wales Interim Policy, Procedures for the Protection of Vulnerable Adults from Abuse 2010, the Social Services and Well-being (Wales) Act 2014, and the Modern Slavery Act 2015. CCG also works with local partners to seek consistency with locally agreed frameworks and protocols.

2. SCOPE (outline extent of the policy)

- 2.1. This policy applies to all tenants, prospective tenants, and residents of properties owned by CCG or other persons reasonably suspected of being at risk. It also applies to CCG staff.
- 2.2. The policy will support CCG staff in safeguarding the welfare of vulnerable groups which include, children, young people and adults they have contact with through their work and related activities and will also provide guidance and support to safeguard themselves against allegations.

3. RESPONSIBILITIES

- 3.1. It is the responsibility of the Director of Customer and Communities and the Assistant Director – People to ensure that this policy is applied effectively, and that CCG staff are trained appropriately in the procedures associated with this policy.
- 3.2. Specific responsibilities and risk management arrangements are set out as a matrix in Appendix A. A list of supporting documents can be found in section 8 of this policy.

4. POLICY DETAIL

- 4.1. One of the most important principles of safeguarding is that it is everyone's responsibility. The Welsh Government expects each professional and

organisation to do everything it can to ensure that children and adults at risk of abuse are protected from abuse.

- 4.2. CCG recognises that vulnerable groups to whom we provide services have a right to protection from abuse or neglect, and the highest possible standard of care.
- 4.3. CCG is committed to protecting vulnerable groups and dealing with allegations, concerns or disclosures of abuse or neglect effectively.
- 4.4. Abuse may take many different forms including:
 - Physical
 - Sexual
 - Emotional / Psychological
 - Economic and financial
 - Neglect
 - Discriminatory and/or hate crime
 - Domestic violence
 - Forced marriage
 - Modern Slavery, including human trafficking, slavery, child slavery, debt bondage, servitude and forced or compulsory labour

Definitions of abuse are set out in section 7 of this policy.

- 4.5. **Duty to report** - If CCG has reasonable cause to suspect that a child or adult:
 - is experiencing or is at risk of abuse or neglect or other kinds of harm
 - has needs for care and support (whether or not the local authority is meeting these needs), and
 - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

CCG will inform the relevant local authority of that fact.

- 4.6. CCG will identify a Designated Safeguarding Vulnerable Groups (SVG) manager who has responsibility for making decisions relating to Safeguarding. Designated SVG co-ordinators will support the role of the SVG Manager.

Designated SVG Manager	Designated SVG Co-ordinator
Assistant Director of Customers and Communities	Neighbourhood Services Assistant Manager
Assistant Director People – for staff matters	

-
- 4.7. Each case will be assessed on its individual merits, as a person's vulnerability will depend on their circumstances and environment. Regard will be given to the:
- frailty or vulnerability of the person at risk;
 - extent of abuse or neglect;
 - length of time and frequency of the occurrence;
 - impact on the individual;
 - risk of repeated or escalating acts involving this or other groups at risk.
- 4.8. CCG will make its staff aware of their duty to report and the requirement that they report any concerns they have according to H&Sp54 – Process for Reporting Suspected Abuse of Vulnerable Groups.
- 4.9. Indicators of abuse and neglect are set out in paragraph 8 of this policy. CCG acknowledges that the indicators of abuse might not definitely mean that abuse has taken/is taking place. However, CCG requires its staff, if they have reasonable cause to suspect that a child or adult is at risk, to report their concerns.
- 4.10. **Guidance about children and adults at risk** - CCG will give regard to any relevant guidance and protocols provided by Welsh Government, Safeguarding Boards, and relevant local authorities.
- 4.11. **Confidentiality** - CCG will maintain confidentiality when dealing with issues of safeguarding but may share information with partner agencies in accordance with relevant legislation and agreed protocols. Effective sharing and exchange of relevant information between professionals is essential in order to safeguard vulnerable groups.
- 4.12. Normally, CCG will not share personal information without the consent of the person or their guardian as appropriate. A record will be kept of all personal information shared for safeguarding purposes. This record will include how the consent to share information was given, with who the information is shared, and how the information has been shared,
- 4.13. There may be some circumstances in which sharing confidential information without consent will be justified in the public interest. For example, where there is reasonable cause to believe a child or adult is at risk of suffering significant harm, or to prevent significant harm.
- 4.14. **Supply of information requested by Safeguarding Boards** - CCG will comply with a request made by a Safeguarding Board to supply specified information unless doing so would:
- Be incompatible with the duties of CCG, or
 - Otherwise have an adverse effect on the exercise of the functions of CCG

If CCG decides not to comply with a request for information, it will give the Safeguarding Board written reason(s) for the decision.

- 4.15. CCG will co-operate fully with other agencies and partners in dealing with safeguarding issues
- 4.16. CCG is represented at monthly MARAC (Multi Agency Risk Assessment Conference) meetings and attend Social Services case conferences and meetings when required.
- 4.17. **Recruitment** – Full details on recruitment are included in CCG’s Recruiting and Selection policy.
- 4.18. Any appointment to a post who has regular contact, legally defined as ‘regulated activity’, with vulnerable groups will be subject to a Disclosure Barring Service (DBS) enhanced disclosure. These posts include:
 - Sheltered Housing Officers
 - Community Wardens Housing Officers
 - Support Officers
 - Occupational Therapists
 - Site Warden
- 4.19. If a prospective employee has a criminal record, CCG will adopt a risk-based approach when deciding whether to appoint the individual. The seriousness of the offence and the length of time that has passed since the offence was committed will be considered
- 4.20. Once appointed, CCG will update an employee’s DBS check every 3 years
- 4.21. **Training** - Staff dealing with vulnerable groups will receive regular training updates on dealing with allegations of abuse. All training will be in accordance with national guidance and training requirement for staff in relation to Safeguarding Vulnerable Groups at the identified training levels.
- 4.22. Further awareness training will be carried out by SVG co-ordinators through forums such as toolbox talks, team briefs etc.
- 4.23. **Staff** - CCG has procedures for dealing with allegations against staff, and to protect staff who raise serious concerns about practice (whistle blowing).
- 4.24. **Suppliers** - All procurement projects will be assessed for safeguarding risks, and CCG will encourage safeguarding standards in our suppliers to ensure the protection of vulnerable groups.
- 4.25. Where services are provided by third parties, CCG expects these third parties to comply with our internal policies and all relevant legislation in relation to safeguarding vulnerable groups and according to this policy. Basic safeguarding contract clauses will be included in contracts where appropriate.

-
- 4.26. Where relevant, suppliers will be required to have in place appropriate safeguarding policies, procedures (including staff and sub-contractor recruitment, selection and vetting procedures) and systems prior to awarding a contract to them.
- 4.27. Where, through the provision of services to CCG, a supplier's employee has serious concerns in relation to the protection of vulnerable groups, they must raise their concern in accordance with any internal procedures put in place by their company. If no such procedures exists, the service provider is expected to notify the relevant Local Authority.

5. REVIEW OF DECISION

- 5.1. CCG recognises the right to request a review of any decision relating to this policy. Any such review will be dealt with as a complaint under the CCpol01 – Complaints and Concerns Policy
- 5.2. CCG will ensure that any decisions relevant to this policy are reasonable and comply with relevant policy and legislation.

6. EQUALITY AND DIVERSITY

- 6.1. In applying this policy, CCG will be committed to treating all persons fairly and with regard to its Equality and Diversity policy.
- 6.2. We aim to respond promptly and sensitively to the needs and rights of an individual, taking account of his/her racial and cultural background, gender, religious belief, sexuality, age and disability

7. DEFINITIONS AND ACRONYMS

- 7.1. CCG provides the following as definitions of persons that are considered to be within **vulnerable groups**:
- A **vulnerable adult** is defined as someone who is aged 18 or over who is or may be in need of community care services by reason of mental health problems, learning difficulties or other disability, age or illness; and who is or may be unable to take care of themselves or unable to protect themselves against harm or exploitation.
 - A **child or young person** is used to refer to anyone under 18 years of age
- 7.2. The term '**staff**' applies to all full time and part time, permanent or temporary CCG employees and also covers agency staff, and those on placement with CCG.
- 7.3. "**abuse**" means physical, sexual, psychological, emotional or financial abuse (and includes abuse taking place in any setting, whether in a private dwelling, an institution or any other place), and "financial abuse" includes:
- having money or other property stolen;
 - being defrauded;
 - being put under pressure in relation to money or other property;

- having money or other property misused.

7.4. “**neglect**” means a failure to meet a person’s basic physical, emotional, social or psychological needs, which is likely to result in an impairment of the person’s well-being (for example, an impairment of the person’s health or, in the case of a child, an impairment of the child’s development).

7.5. **CATEGORIES OF ABUSE:**

Physical abuse – includes slapping, punching, kicking, biting, hair pulling and assaults with objects. Injuries that may be evident include bruising, cuts and fractures. Other injuries that are not evident could include internal injuries and miscarriages.

Physical abuse is any physical pain, suffering or injury wilfully inflicted by a person who has responsibility, charge, care, or custody of, or who stands in a position of or expectation of trust to a child, young person or adult. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a young person or adult whom they are looking after. This situation may be described as fabricated or induced illness by the carer.

Sexual abuse - includes rape and non-consensual sexual acts. Sexual abuse involves forcing or enticing a young person or adult to take part in direct or indirect sexual activities to which they are unwilling or unable to give informed consent, or which they do not fully comprehend, or which violates the social taboos of family roles, for example, incest. The activities may involve physical contact, including penetrative or non-penetrative acts.

Emotional and/or psychological abuse - this form of abuse may include intimidation, verbal abuse, humiliation and degradation. Any behaviour which causes fear is also included and may include shouting, staring, threats, gestures, property destruction, prolonged silences and harassment. Also, controlling behaviour such as isolating victims from friends and family and sources of support and regulating their everyday life.

Emotional or psychological abuse is the wilful, and sometimes persistent, ill treatment of a young person or adult resulting in mental suffering. It may involve conveying to a young person or adult that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on them. It may involve causing them frequently to feel frightened or in danger, for example by witnessing domestic abuse within the home, or being bullied, or the exploitation or corruption of young person or adults. Some level of emotional abuse is involved in all types of ill treatment of a child or adult, though it may occur alone.

Economic and financial abuse - this form of abuse may include controlling or withholding money or access to finances, demanding receipts for everything spent or providing an allowance knowing it to be insufficient and then using

overspending as a reason to punish. Financial or economic abuse is any theft or misuse of a person's money, property or resources, by a person in a position of, or expectation of trust to a child, young person or adult.

Neglect is the persistent failure to meet a young person or adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect them from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, their basic emotional needs. In addition, neglect may occur during pregnancy as a result of maternal substance misuse.

Discrimination and Hate Crime - This may be a feature of any form of abuse of a child, young person or adult but can also be motivated because of their age, gender reassignment, sex, race (including ethnic or national origin, colour or nationality), disability, pregnancy and maternity, sexual orientation, religion or belief (including lack of belief.)

Domestic Violence – is normally defined as any incident or pattern of incidents of controlling, coercive, 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 - This is defined as a marriage conducted without the valid consent of both parties to the marriage and duress is involved.

Modern Slavery - forced to work – through coercion, or mental or physical threat; owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse; dehumanised, treated as a commodity or bought and sold as 'property'; physically constrained or have restrictions placed on their freedom of movement

7.6. EXAMPLES AND INDICATORS OF ABUSE AND NEGLECT

- Typical examples of **physical abuse** include: hitting, pushing, unreasonable physical restraint, slapping, physical intimidation, punching, dragging, and physically forcing someone to do something against their will.
- Possible indicators of **physical abuse** include: an injury incompatible with its explanation, an injury which has not been properly cared for; cuts, scratches, lacerations, bruises, fingertip and pinching marks, burns and scalds, flinching.
- Typical examples of **sexual abuse** include: rape, actual or threatened sexual assault, abuse of power to gain sexual satisfaction, inappropriate use of explicit sexual language which causes offence, non-contact abuse, (for example, looking, photography, indecent exposure, harassment), sexual teasing or innuendo.

- Possible indicators of **sexual abuse** include: difficulty in walking or sitting, mood changes, over-affectionate displays, a change in usual behaviour, withdrawal, love bites.
- Typical examples of **emotional or psychological abuse** include: verbal assault (for example, shouting, screaming), humiliation, threats, depriving a person of due respect, denial of dignity and affection, bullying, name calling, ridiculing, conditional 'love', denial of access to cultural or religious observances.
- Possible indicators of **emotional or psychological abuse** include: high levels of anxiety/stress especially in response to certain individuals or circumstances; self-harm; agitation, fear, signs of depression (such as suicidal thoughts), excessive and inappropriate craving for affection, an anxiousness to please, running away or not wanting to go home.
- Typical examples of **financial or economic abuse** include: theft of a child, young person's or adult's money or possessions; misuse of a child, young person's or adult's money or possessions; gaining money or possessions by threat, persuasion or exploitation, extortion.
- Possible indicators of **financial or economic abuse** include: a lack of amenities (for example a lack of appropriate clothing, school materials) that the child, young person or adult should reasonably be able to afford, 'missing' personal items such as jewellery, mobile phone etc.
- Typical examples of **neglect** include: a failure to assist or provide a child, young person, or v adult with food, shelter or clothing, a failure to protect from health and safety hazards, confining a child, young person or adult to a room on their own, restricting or preventing social contact with friends or relatives.
- Possible indicators of **neglect** include: general deterioration of health, unsuitable clothing for the weather conditions, untreated medical condition, rashes, sores, lice, a consistent lack of supervision, either at home or during activities which hold danger for them.

7.7. MARAC – Multi Agency Risk Assessment Conference

8. REFERENCES

- 8.1. The following publications and legislation have been referenced during the drafting of this policy:
- 8.2. Public Interest Disclosure Act 1998
- 8.3. Safeguarding Vulnerable Groups Act 2006
- 8.4. All Wales Child Protection Procedures 2008
- 8.5. All Wales Interim Policy and Procedures for the Protection of Vulnerable Adults from Abuse 2010
- 8.6. <http://www.northwalessafeguardingboard.wales/policies-and-procedures/>

-
- 8.7. Equalities act 2010
 - 8.8. Protection of Freedoms Act 2012
 - 8.9. Social Services and Well-being (Wales) Act 2014
 - 8.10. The Modern Slavery Act 2015
 - 8.11. Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015
 - 8.12. Working Together to Safeguard People Volume 1 – Introduction and overview
 - 8.13. TSpol01 - Domestic Abuse Policy
 - 8.14. NSpol01 - Anti-social behaviour policy
 - 8.15. HRp04 - Recruitment Management
 - 8.16. L&Dpol01 - Learning and Development Policy
 - 8.17. HRp07 – Disciplinary and Grievance Procedure
 - 8.18. HRpol11 -Code of Conduct
 - 8.19. HRpol18 – Whistle Blowing Policy
 - 8.20. CCpol01 – Complaints and Concerns Policy.
 - 8.21. E&Dpol01 – Equalities and Diversity Policy
 - 8.22. HSI02 – Safeguarding Vulnerable Groups Fact Sheet
 - 8.23. HSf43 Safeguarding Vulnerable Groups Referral Form
 - 8.24. HSp54 – Process Map for Reporting Suspected Abuse of Vulnerable Groups

9. RECORDS

- 9.1. It is important that records relating to allegations of abuse is stored securely. Electronic records will be saved in our housing management system.

10. REVIEW

- 10.1. This procedure will be reviewed every 3 years, or in response to changes in legislation, regulatory guidance, good practice or changes in other relevant CCG Cyf. Policy.

APPENDIX A - RESPONSIBILITIES AND ARRANGEMENTS

Key:

- R** = **Responsible:** Persons who carry a responsibility to ensure risk management arrangements as detailed below are actioned within their teams
- A** = **Accountable:** Accountable person for all actions detailed within the matrix
- C** = **Consulted:** Individuals /Teams that are consulted on the risk management arrangements as detailed below
- I** = **Informed:** Individuals /Teams informed via training, briefings, toolbox talks or by familiarizing themselves with processes, procedures & guidance available on Clic

RISK MANAGEMENT ARRANGEMENTS	Chief Executive	Director of Customers and Communities	Assistant Director – People Services	Safeguarding Manager (Assistant Director Customer and Communities)	Safeguarding Co-ordinators (Neighbourhood Services Assistant Manager)	Neighbourhood Services Manager	Procurement Manager	Customer Services Manager	Head of ICT	HSE Manager	All staff
Ensure our commitment to achieving our HSQE assurance strategy and requirements, by ensuring that documents and processes are developed to address Safeguarding issues and reporting where there is reasonable cause to suspect abuse	A	R	I	I	I	I	I	I	I	I	I
Ensure that this policy is applied effectively	I	R	R	I	I	I	I	I	I	I	I
All new staff identified as undertaking regulated activity have applied for an “enhanced disclosure” and a “barred list check” in accordance with the Disclosure and Barring Service (DBS) procedures	I	I	R	I	I	R	I	I	I	I	I
Existing staff, changing roles within CCG who were not originally subject to an ‘enhanced disclosure’ to apply for one in accordance with the DBS procedures	I	I	R	I	I	R	I	I	I	I	I
Staff requiring an “enhanced disclosure” to have their check reviewed on a 3 year rolling cycle	I	I	R	I	I	R	I	I	I	I	I

Relevant staff prohibited from working with vulnerable groups until the checks have been processed and cleared by HR.	I	I	R	I	I	R	I	I	I	I	I
Pre-employment checks carried out and cleared by HR (e.g. references etc)	I	I	R	I	I	C	I	I	I	I	I
A risk assessment to be completed to mitigate any one to one unsupervised contact from staff involving apprentices and work experience placements	I	I	C	I	C	R	I	I	I	I	I
Visitors and individuals undertaking work shadowing to be supervised at all times and not have one to one unsupervised access to vulnerable individuals	I	I	C	C	I	R	I	I	I	I	I
Contractors and Sub-contractors to have SVG policies and procedures in place including disclosure checks where it is deemed appropriate	I	I	C	I	C	R	R	I	I	I	I
Designated SVG Manager and deputies identified	I	I	R	C	C	I	I	I	I	I	I
Ensure that procedures and processes are in place to enable staff to act upon information which implies abuse/neglect is taking place or there's a risk of abuse/neglect taking place	I	R	R	R	R	C	I	I	I	C	I
Identify and report any concerns regarding risk of harm to any vulnerable person or groups according to procedures and processes	I	C	C	R	R	I	I	I	I	C	R
Designated SVG Co-ordinators make referrals based on information received from staff	I	I	I	C	R	I	I	I	I	I	I
Designated SVG Co-ordinators to liaise with Social Services	I	I	I	C	R	I	I	I	I	I	I
Ensure that a Code of Conduct is in place, communicated to staff and reviewed regularly	I	R	R	R	R	R	I	I	I	I	I
Ensure that a Data Protection Policy is in place, communicated	I	I	R	C	C	C	I	I	I	I	I

to staff and customers, and reviewed regularly												
Ensure that a Whistle-blowing Policy is in place, communicated to staff and reviewed regularly	I	I	R	C	C	C	I	I	I	I	I	I
Ensure that all staff receive basic SVG awareness training as part of their induction programme	I	R	R	R	C	C	I	I	I	I	I	I
Ensure that all staff who are expected to have unsupervised contact with young people and adults to receive level 2 awareness, recognition and referral training.	I	I	R	C	C	C	I	I	I	I	I	I
Ensure that Level 2 training is undertaken at intervals of no more than 3 years	I	R	R	C	C	R	I	I	I	I	I	I
Ensure that a confidential electronic recording system is established and maintained to store information on all referrals and supporting documents	I	C	C	R	R	I	I	I	R	C	I	I
Bring to the attention of the HSE Manager (where necessary) the need for additional support packages to be made available to enable duties to be fully discharged	I	R	R	R	R	R	R	R	R	C	I	I
Requests for a review of any decision relating to this policy to be dealt with as a complaint under the CCpol01 – Complaints and Concerns Policy	I	C	C	C	C	C	C	R	I	I	I	I
Report any concern for safety or risk of harm to any vulnerable person or groups in accordance with H&Sp54 – Process for Reporting Suspected Abuse of Vulnerable Groups.	I	R	R	R	R	R	R	R	R	R	R	R