

Safeguarding policy and procedure

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Section 1: Overview

1.1 Purpose

1.1.1 Frontline recruits and develops outstanding individuals to be social workers and leaders to transform the lives of the most vulnerable children and families. As such, safeguarding is at the heart of what we do. And not just for vulnerable children and their families, but also for our staff, our participants, our partners and all those that come into contact with the charity. We act to protect everyone who encounters Frontline from harm and strive to make every encounter with Frontline a positive one.

1.1.2 Frontline has a specific duty to protect children and adults at risk and this policy primarily sets out how Frontline keeps them safe and responds to any safeguarding concerns. However, most of the principles are relevant for application more widely, beyond just children and adults who meet the statutory definition of being at risk, to everyone the charity works with.

1.1.3 Whilst this policy covers safeguarding in relation to both children and adults at risk, Frontline recognises that the procedures required for managing safeguarding in relation to children differ to those in relation to adults at risk. Frontline places equal importance on safeguarding both groups, and the key differences in approach are highlighted in section 2.1.

1.2 Scope

1.2.1 This policy applies to all Frontline staff (including contractors and volunteers), trustees, participants on any of Frontline’s programmes, fellows and partner organisations. These are collectively referred to as “stakeholders” for the duration of this policy. It will be implemented when a safeguarding concern arises in connection with Frontline activity. Concerns that are unconnected to Frontline are outside the scope of this policy.

1.2.2 When a participant has a safeguarding concern in relation to a case they are handling as part of their practice learning experience or subsequent employment by the local authority, they should follow their local authority's policies and procedures instead of Frontline's policies and procedures.

1.2.3 When a safeguarding concern has been raised in a Local Authority context that involves a participant, the Local Authority will follow their own statutory safeguarding procedures and will notify Frontline.

1.2.4 The policy is available to staff on Frontline's document management platform and is also available to all other parties on Frontline's website.

1.3 Responsibilities

1.3.1 The delivery director is responsible for ensuring the implementation of this policy across the organisation.

1.3.2 The designated safeguarding lead is responsible for convening and chairing a meeting of the safeguarding decision group whenever a safeguarding concern involving children or adults at risk is raised, undertaking the duties outlined in section 2.4 and maintaining appropriate records.

1.3.3 The designated safeguarding officers are responsible for considering safeguarding concerns related to those not categorised as children or adults at risk and consulting with the designated safeguarding lead. See section 2.5 for further detail.

1.3.4 The Chief Executive Officer is responsible for maintaining communication with and making recommendations to the lead trustee for safeguarding and the board's safeguarding, policies and complaints committee.

1.3.5 The Chair of the board is responsible for making the final decision on whether to report any safeguarding incidents to the relevant regulators.

1.3.6 All the groups listed in 1.2.1 are responsible for knowing their safeguarding duties, including how to protect children and adults at risk, following the procedures outlined in this policy and adhering to the code of conduct.

1.3.7 Staff members and participants who require an enhanced DBS check to undertake their role must notify a member of the HR team if they are the subject of an investigation by the police or other safeguarding agency into an allegation of abuse of a child or adult at risk and disclose any relevant police cautions or convictions for criminal offences.

1.4 Definitions

1.4.1

Adult at risk	A person aged 18 or above with care and support needs who is experiencing, or is at risk of, abuse or neglect and, as a result of their care and support needs, is unable to protect themselves from this.
Child	A person under the age of 18.
Frontline stakeholders	Frontline staff (including contractors and volunteers), trustees, participants on any of Frontline's programmes, fellows and partner organisations.
Safeguarding	Protecting people from harm, including abuse and neglect.
Safeguarding concern	A worry about the safety or wellbeing of an individual; suspecting someone may be experiencing or at risk of abuse or neglect.

Section 2: Policy and procedures

2.1 Preventing harm

2.1.1 Frontline has put appropriate safeguards and procedures in place to prevent those it works with from coming to harm. These include:

- annually reviewing this policy and procedure;
- having a culture of freedom and responsibility where feedback is encouraged and welcomed;
- providing a framework of support, monitoring and assessment for participants on the Frontline programme;
- assessing the suitability of all job applicants, staff, volunteers and trustees through rigorous recruitment procedures;
- obtaining DBS checks at the highest level a role is eligible for;
- training staff, volunteers and participants on safeguarding matters and policies;

- having a named lead trustee for safeguarding and a safeguarding, policies and complaints board committee;
- operating appropriate health and safety policies and procedures;
- ensuring partner organisations and sub-contractors have appropriate safeguarding policies and procedures in place where the service they provide to Frontline includes work with children and/or adults at risk;
- having a whistleblowing policy for staff and participants that references safeguarding concerns; and
- maintaining an ISO27001 accreditation for information security management and GDPR compliance to ensure the safe handling of personal data; and

2.2 Safeguarding children and adults at risk

2.2.1 The following sections 2.3 and 2.4 relate to the safeguarding of children and adults at risk.

2.2.2 Children and adults at risk may face different sets of issues and there is different legislation for both groups. Some aspects of the process for managing safeguarding in relation to children therefore differ to those in relation to adults at risk. The key differences are as follows:

Safeguarding children

2.2.3 Safety is the primary concern. Whilst a child's views are important, they are not considered to be responsible for protecting themselves.

2.2.4 Abuse should be reported to the local children's social care team.

Safeguarding adults

2.2.5 Adults have a right to self-determination. The law mostly intervenes only when an adult is assessed to lack capacity in making choices about their protection or where the concern also extends to children.

2.2.6 Safeguarding adults is not just about having systems and processes in place. Frontline will engage, consult and inform regarding all decisions affecting them.

2.2.7 Financial abuse and organisational abuse are more likely to be relevant with respect to adults than children.

2.2.8 Abuse should be reported to the local adult social care team.

2.3 Recognising and responding to concerns about abuse

Recognising

2.3.1 A safeguarding concern could be raised as a result of someone:

- directly disclosing they have been abused;
- displaying behaviour or making verbal statements that signal something is wrong;
- trying to communicate non-verbally; or
- exhibiting signs that could be indicators of abuse.

2.3.2 The different categories and signs of abuse are detailed in Annex 4.2. All stakeholders should be familiar with these.

2.3.3 Stakeholders should respond to a disclosure of abuse in a way that shows that the person making the disclosure is being listened to and supported - by giving their full attention, not rushing the disclosure and reflecting back what's been said.

2.3.4 Stakeholders should *never promise confidentiality* to someone who makes a disclosure *nor attempt to investigate the allegation* - they should explain they need to share what they've been told with someone who will be able to help.

2.3.5 It may however be helpful to ask a few clarifying questions, either where someone makes a disclosure or displays signs or behaviours that suggest concerns about their safety. Interpreting behaviours and verbal comments can be subjective and gaining a fuller understanding could be helpful.

2.3.6 Stakeholders should, however, maintain a duty of confidentiality and only share information in accordance with this policy.

2.3.7 Stakeholders shouldn't wait for someone to directly disclose abuse before they take action.

Gathering consent

- 2.3.8** Stakeholders should seek consent to share information externally about children and adults. Where a child does not have the required competency to make their own decisions, their parent or carer should be asked, unless the parent or carer are involved in the concern.
- 2.3.9** Stakeholders should make a written record of any consent given verbally.
- 2.3.10** If consent is refused or cannot be sought, the stakeholder can and should still share information with relevant professionals if this is in the public interest, including to protect the individual from significant harm, the information indicates a serious crime has been or will be committed or there is a possible terrorist threat, or you think the person lacks the mental capacity to decide and it would be in the individual's best interests. If there is uncertainty as to how to proceed, they should consult with the designated safeguarding lead.
- 2.3.11** Adults have a right to self-determination that children do not have. Adults may choose not to act at all to protect themselves, and the law often only intervenes when an adult is assessed to lack capacity in that area, or where the concerns may extend to children, such as when they are living in the same household.

Responding

- 2.3.12** If a stakeholder believes that an individual is in immediate danger, they should call the police on 999 as well as following the procedure detailed below.
- 2.3.13** Stakeholders should keep accurate and detailed notes on any safeguarding concerns they have, including:
- the person's name and details
 - what they said or did that gave cause for concern (if they made a verbal disclosure then record their exact words)
 - any information given about the alleged abuser
- 2.3.14** They should inform the designated safeguarding lead of their concerns by completing the safeguarding incident or concern reporting form as soon as possible, so that they can decide what the next steps are. See Annex 4.3 for contact details. The only exception to this is where a participant has a concern that has arisen from their practice learning

experience or employment, in which case they should follow their local authority's safeguarding procedures.

2.3.15 The designated safeguarding lead will then follow the procedures outlined in section 2.3 below.

2.3.16 If the person reporting a concern has reason to believe the designated safeguarding lead has not responded appropriately to their report, they should refer the matter to the Chief Executive Officer. If they still have concerns about Frontline's response having referred the matter to the Chief Executive Officer, they should raise the matter under Frontline's whistleblowing policy.

2.4 Designated safeguarding lead: responding to, reporting and closing a case

Record keeping

2.4.1 The designated safeguarding lead will maintain:

- a case file for each case, to include, but not be limited to, the reporting form and safeguarding concern assessment and management form; and
- a concerns log

2.4.2 Records will be stored in a secure location and access will be limited to relevant staff.

Responding

2.4.2 When notified of a safeguarding concern, the designated safeguarding lead will speak to the individual who raised the concern and make an immediate initial assessment of the concern, referring to Annex A of the safeguarding concern assessment and management form for guidance (page 29). The assessment should be recorded in section one of the form within 24 hours.

2.4.3 The immediate initial assessment will include determining whether the individual concerned is in immediate danger or there is a current risk of harm. Where this is the case, the designated safeguarding lead will notify the police (if this has not already been done) and the relevant local authority safeguarding team.

- 2.4.4 If the designated safeguarding lead is not available, the deputy safeguarding lead will assume their role.
- 2.4.5 They will then notify the Chief Executive Officer (considering the guidance given in Annex 4.4 on 'Keeping others informed') and decide together whether the concern meets the threshold for initiation of the incident management plan. The designated safeguarding lead will also convene a meeting of the safeguarding decision group within 24 hours, to consist of:
- themselves (the designated safeguarding lead);
 - the team director or head responsible for the business area from which the concern has arisen; and
 - the governance and compliance (GC) manager
- 2.4.6 The safeguarding decision group will review the initial assessment of the concern and agree on the next steps to be taken and by whom. If one of the decisions taken is to notify the board safeguarding lead, the board safeguarding lead may request to ratify any further decisions.
- 2.4.7 The designated safeguarding lead is responsible for completing sections two and three of the safeguarding concern assessment and management form, in discussion with the safeguarding decision group (section two) and Chief Executive Officer (section three). This will include ensuring any necessary referral is made to relevant regulatory and/or professional bodies.

Reporting

- 2.4.8 When it is identified that a referral needs to be made to the local authority safeguarding team, the designated safeguarding lead will identify the correct local safeguarding board and follow their guidance for reporting. The correct team to contact will depend on which local authority the concern relates to. For concerns relating to children and young people, this can be identified using the government's postcode tool [here](#). The relevant local authority website will also explain what steps to take. For concerns relating to adults at risk, consult the relevant council's website.
- 2.4.9 They will then agree their continuing role with the local authority safeguarding team.

2.4.10 The designated safeguarding lead will also consider whether a report needs to be made to the Disclosure and Barring Service, the Charity Commission and/or Social Work England or other bodies and make a recommendation to the Chief Executive, who will make a recommendation to the board's safeguarding, policy and complaints committee and then the Chair of the board. It may be appropriate to consult the relevant body for advice before making a report.

2.4.11 Wherever possible they will seek consent from the person(s) involved in the concern and be clear about why, what, how and with whom their information will be shared, following the principles outlined in section 2.3.8 to 2.3.11.

Closing a case

2.4.12 The designated safeguarding lead will close a case when it is agreed that they no longer have any ongoing role or actions to complete. They will notify anyone involved and complete section four of the safeguarding concern assessment and management form.

2.5 Safeguarding procedures for those not categorised as children or adults at risk

2.5.1 If a stakeholder has a safeguarding concern in relation to someone who is neither a child nor adult at risk, e.g. a staff member or participant, the guidelines set out in section 2.3.1 to 2.3.13 are still relevant.

2.5.2 The stakeholder should notify the relevant designated safeguarding officer as detailed in Annex 4.3.

2.5.3 The designated safeguarding officer will consider the concern and consult with the designated safeguarding lead to determine the appropriate response. Depending on the nature of the concern, the designated safeguarding lead may choose to follow the procedures outlined in section 2.4.

2.6 Responding to allegations made against staff or volunteers

2.6.1 Any safeguarding allegations or concerns made about staff or volunteers will be taken seriously and dealt with sensitively and promptly, whilst maintaining confidentiality.

2.6.2 This safeguarding policy and procedures will be followed, and in addition, Frontline's Head of People will be notified. The Head of People will determine whether it is appropriate to also instigate disciplinary procedures. In accordance with the disciplinary policy, the decision may be taken to suspend the employee pending the completion of any investigation.

2.6.3 The allegation will be followed up even if someone resigns from their post.

2.7 Responding to allegations made against participants

2.7.1 Any safeguarding allegations or concerns made about Frontline participants will be taken seriously and dealt with sensitively and promptly, whilst maintaining confidentiality.

2.7.2 This safeguarding policy and procedures will be followed, and in addition, the participant's Head of Region will be notified. The Head of Region will determine whether it is appropriate to also instigate fitness to practise procedures. This may be either Frontline or the local authority's procedures depending on which year of the programme the participant is in. In accordance with the fitness to practise procedures, the participant may be suspended pending the completion of any investigation.

2.7.3 The allegation will be followed up even if someone withdraws from the programme.

2.8 Prevent (radicalisation)

2.8.1 Radicalisation can result in a person becoming drawn into terrorism and is in itself a form of harm. Please refer to Frontline's policy on modern slavery and radicalisation for further guidance.

Section 3: Relevant references

3.1 Laws and regulations

3.1.1 Safeguarding Vulnerable Groups Act 2006

3.1.2 Safeguarding children

Working together to safeguard children 2018

[Gillick competency and Fraser guidelines](#)

3.1.3 Safeguarding adults

The Care Act 2014

Mental Capacity Act 2005..

3.2 Further guidance and policies

3.2.1 The following guidance and resources have been consulted in developing this policy and procedure:

- <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>
- <https://knowhow.ncvo.org.uk/safeguarding>
- <https://learning.nspcc.org.uk/safeguarding-child-protection/>
- <https://www.anncrafttrust.org/resources/>

Section 4: Annexes

4.1 Code of conduct for Frontline staff (including volunteers and contractors) and trustees¹

4.1.1 In your role with Frontline you are acting in a position of trust and authority and have a duty of care towards the people we work with. You are likely to be seen as a role model and are expected to act appropriately. In accordance with Frontline’s culture of freedom and responsibility we trust you to act responsibly and have set out below a broad code of conduct that is not expected to be of surprise.

4.1.2 Participants on the Frontline programme are expected to adhere to SWE’s professional standards, Frontline’s code of conduct and misconduct policy (2019 cohort) and the guidance in the Fitness to Practise policy (2020 cohorts and beyond), and to any guidelines issued by their local authorities.

4.1.3 Responsibility

You are responsible for:

- prioritising the welfare of children, young people and adults at risk;
- providing a safe environment for others by ensuring equipment is used safely and for its intended purpose and having good awareness of issues to do with safeguarding and child protection and taking action when appropriate;
- following Frontline’s values, policies and procedures;
- staying within the law at all times;
- modelling good behaviour for others to follow;
- challenging all unacceptable behaviour and reporting any breaches of the behaviour code to a designated safeguarding officer; and
- reporting all concerns about abusive behaviour, following Frontline’s safeguarding procedures.

4.1.3 Rights

You should:

- treat others fairly and without prejudice or discrimination;
- understand that everyone is an individual, with individual needs;

¹ This code of conduct has been adapted from the NSPCC [example behaviour code](#).

- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the organisation;
- challenge discrimination and prejudice; and
- encourage others to speak out about attitudes or behaviour that makes them uncomfortable.

4.1.4 Relationships

You should:

- promote relationships that are based on openness, honesty, trust and respect;
- avoid favouritism;
- be patient with others;
- exercise caution when you are discussing sensitive issues with children or young people;
- ensure your contact with children and young people 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 and young people - if a situation arises where you are alone with a child or young person, ensure that you are within sight or hearing of other adults (except in the case of a Frontline participant working within their professional boundaries as a social worker);
- keep other Frontline stakeholders informed of where you are and what you are doing; and
- only provide personal care in an emergency and make sure there is more than one adult present if possible.

4.1.5 Respect

You should:

- listen to and respect others at all times;
- value and take everyone's contributions seriously; and
- respect people's rights to personal privacy as far as possible - if you need to break confidentiality in order to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity.

4.1.6 Unacceptable behaviour

You must not:

- allow concerns or allegations to go unreported;
- trivialise abuse;
- take unnecessary risks;
- smoke or consume alcohol in the course of performing your duties for Frontline², or use illegal substances;
- develop inappropriate relationships;
- make inappropriate promises;
- engage in behaviour that is in any way abusive, including having any form of sexual contact with a child, young person or adult at risk;
- let children and young people have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account;
- act in a way that can be perceived as threatening or intrusive;
- take photos of people without their permission;
- patronise or belittle children and young people;
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people.

² Alcohol may be responsibly consumed when provided at Frontline events

4.2 Categories and signs of abuse

- 4.2.1 There are many different forms of abuse. This annex is intended to provide a short summary and has been taken in most part from the NSPCC's factsheet on the definitions and signs of child abuse and Care Act statutory guidance. For more detailed information please refer to the NSPCC factsheet [here](#) and the Care Act guidance [here](#) (chapter 14).
- 4.2.2 **Physical abuse** happens when someone is deliberately hurt, causing injuries such as cuts, bruises, burns and broken bones.
- 4.2.3 **Neglect** is persistently failing to meet basic physical and/or psychological needs, usually resulting in serious damage to their health and development. In adults this can include **self-neglect**.
- 4.2.4 **Sexual abuse** is forcing someone (or enticing a vulnerable person) to take part in sexual activities. It doesn't necessarily involve violence and the person may not be aware that what is happening is abuse. **Child sexual exploitation** is a type of sexual abuse when young people in exploitative situations and relationships receive things such as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities.
- 4.2.5 **Harmful sexual behaviour** can develop in children and young people and can cause harm to themselves and others. It may include using sexually explicit words and phrases, inappropriate touching or using sexual violence or threats.
- 4.2.6 **Emotional abuse** is any type of abuse that involves the continual emotional mistreatment of a person. It's sometimes called psychological abuse and can include humiliation, constant criticism, manipulation and failure to praise.
- 4.2.7 **Domestic abuse** is any type of controlling, bullying, threatening or violent behaviour between people who are or were in an intimate relationship.
- 4.2.8 **Bullying** is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. **Cyberbullying** is bullying that takes place online, for example via social networks, gaming and mobile phones.
- 4.2.9 **Modern slavery** is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other

means for the purpose of exploitation. It may include criminal or commercial exploitation. **Human trafficking** is included within modern slavery.

4.2.10 Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons.

4.2.11 Discriminatory abuse is abuse because of race, gender and gender identity, age, disability, sexual orientation or religion and takes the form of harassment, slurs or similar treatment.

4.2.12 Financial or material abuse includes theft, fraud, exploitation or coercion in relation to an adult's financial affairs or arrangements.

4.2.13 Organisational abuse includes neglect and poor care practice in relation to an adult within an institution or specific care setting such as a hospital or care home.

4.2.14 Human rights abuses such as forced marriage, which is marriage where one or both people do not, or cannot, consent to the marriage and where duress is used to enforce the marriage.

4.2.15 There is no one sign of abuse but many of the signs someone is being abused are the same regardless of the type of abuse. In addition, people may experience multiple types of abuse at once e.g. sexual abuse and emotional abuse. Anyone working with children or adults at risk should look out for:

- regular flinching in response to sudden but harmless actions
- showing an inexplicable fear of particular places or making excuses to avoid particular people
- children having knowledge of adult issues
- angry outbursts or behaving aggressively
- becoming withdrawn or appearing anxious, clingy or depressed
- self-harming or thoughts about suicide
- changes in eating habits or developing eating disorders
- regularly experiencing nightmares or sleep problems
- children running away or regularly going missing from home or care
- not receiving adequate medical attention after injuries

4.2.16 These signs do not necessarily mean someone is being abused and should be considered in the context of the situation.

4.3 Contact details for key staff

Policy role	Allocated to	Named person at July 2020	Contact details
Designated safeguarding lead	Delivery Director	Lisa Hackett	safeguarding@thefrontline.org.uk