

Safeguarding Policy and Procedure

This document outlines Norpro Training's policy on responding to concerns regarding the safeguarding and protection of children and young people aged under 18 years. This policy, combined with the associated procedures, provides guidance to all staff who may come across concerns of this nature within the context of their work for Norpro Training.

Part 1. Safeguarding children and young people policy

1. Norpro Training's aim is to ensure, through effective inspection and regulation, that outcomes for children and young people are improved by the receipt of better care, services and education. Improved outcomes can only be achieved if children are safe from harm. Therefore, safeguarding the welfare of children is part of our core business.

Purpose of this document

2. The purpose of this document is to outline Norpro Training's policy on responding to concerns regarding the safeguarding and protection of children and young people aged under 18 years. This policy, combined with the associated procedures, provides guidance to all staff who may come across concerns of this nature within the context of their work for Norpro Training. This includes:
 - all members of Norpro Training's workforce,
 - Individuals, consultants and agencies contracted by Norpro Training.

The policy seeks to promote effective multi-agency working in light of the Children Act 2004 and *Working together to safeguard children* (DCSF, (now DfE) 2010).

The definition of safeguarding

3. Norpro Training adopts the definition used in the Children Act 2004 and the Department for Education (DCSF (now DfE)) guidance document *Working together to safeguard children* (2010, paragraph 1.20), which focuses on safeguarding and promoting children and young people's welfare and can be summarised as:
 - protecting children from maltreatment
 - preventing impairment of children's health or development
 - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
 - Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

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Aims and objectives of the policy

4. Norpro Training will ensure that, as well as responding to immediate concerns, we will ensure that appropriate measures and practice to safeguard and promote the welfare of children are in place and bring matters requiring attention to the relevant authorities.
5. All Norpro Training staff are required to complete an online basic safeguarding training and assessment programme, supplemented by a refresher module after three years. Staff are therefore expected to have a good understanding of safeguarding concerns, including potential abuse and neglect of children and young people, which may come to light in the workplace. At whatever level we identify risks we will highlight them and seek to ensure that appropriate steps are taken to safeguard the children concerned.
6. We will ensure that all Norpro Training's employees and those who undertake work on our behalf maintain a proper focus on safeguarding children and young people and that this is reflected both in sound individual practice and our internal policies and guidance. All permanent and contracted staff working with children and young people must:
 - give highest priority to children's welfare
 - recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people
 - respond appropriately to disclosure by a child, or young person, of abuse
 - respond appropriately to allegations against staff, other adults, and against themselves
 - act appropriately during inspection and understand safe practice in carrying out their duties
 - be alert to the risks which abusers, or potential abusers, may pose
 - be aware of the importance of the role of inspected services in promoting the welfare of children and
 - Contribute as necessary to all stages of Norpro Training's safeguarding and protection processes.

Norpro Training's responsibilities

7. Norpro Training does not investigate individual child protection cases or referrals. Norpro Training is not the statutory authority for the conduct of enquiries into specific child protection concerns; therefore all staff need to follow the procedures to ensure that all allegations or suspicions of abuse or significant harm to any child are reported to the children's services department of the relevant local authority. We will share all relevant information with the respective statutory child protection agencies (children's services and/or police) without delay and within agreed protocols.

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8. Norpro Training will ensure that it fulfils its responsibilities to work jointly with others to safeguard and promote the welfare of children and young people and, where necessary, to help bring to justice the perpetrators of crimes against children.
9. Norpro Training will also fulfil its own responsibilities and powers and take whatever enforcement action is deemed necessary to protect children.
10. In all joint inspections it is the expectation that the policy and procedures of the lead inspectorate will be followed when reporting a matter of concern. Despite this it is recognised that individual inspectorates, including Norpro Training, will need to fulfil their own statutory responsibilities and comply with their own internal procedures.

Part 2. Procedures for responding to specific child protection concerns about children at risk of significant harm

Section 1. Scope of the procedure

11. Norpro Training staff (that is, those employed directly by Norpro Training, or working under contract) may encounter child protection concerns. Such concerns could emerge from Norpro Training's regular work, from a member of the public contacting Norpro Training or by a parental complaint.
12. The concern may be brought to our attention by the child or young person themselves, alleged by others or through direct delivery activity and observation.
13. The concerns may therefore be about the behaviour of a:
 - member of staff (for instance a tutor)
 - provider of a service (for instance a childminder, foster parent or volunteer)
 - peer (for instance another young person in a children's home)
 - child or young person or adult in the community (for instance a relative or family friend)
14. The concern may be about a current situation or past events and may be about allegations or disclosures of physical abuse, sexual abuse, emotional abuse or neglect, or a combination of one or more of these categories.
15. Norpro Training staff may receive this information by one or more means, such as a telephone call, a letter, an email, through observation, discussion and the examination of documents.

Any member of Norpro Training staff could receive such information. In all circumstances they must respond in accordance with the following procedure.

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16. The procedures apply both to situations where staff are acting as members of a team and where they are working individually.
17. Staff receiving a parental complaint need to decide whether any matters need to be dealt with under the child protection procedures as well. This may be particularly relevant when considering complaints about bullying. If in doubt contact the Manager at Norpro Training Ltd
18. These procedures give guidance on necessary actions up to the point at which referral is made to the Manager of Norpro Training Ltd.

Section 2. Immediate action to take if, as a member of Norpro Training staff, you observe abuse while it is taking place

19. This could take a number of forms, for instance seeing an adult hit a child, observing a member of staff using inappropriate restraint on a young person or witnessing the neglect of basic care needs of a disabled child.
20. First, do all you can to stop the abuse immediately without putting the child or young person, or yourself, at undue risk. Inform the perpetrator of your concerns. Advise them to stop the action immediately. Ask them to move themselves to an area where there is no contact with children and young people. Advise them that you will immediately be informing the senior manager on site or elsewhere within the organisation.

Then:

- **if the perpetrator fails to desist** – take appropriate action to stop the abuse and call for assistance
- **if the perpetrator does desist**, and even if they leave the scene as requested, it is essential that you stay with the child until you can transfer them to the care of another responsible adult.

Then:

report the incident immediately to your line manager

And:

inform the Norpro Training Manager of the incident. It will almost always be appropriate to inform the senior person on site.

21. **Take notes of what has been said, what you have heard or seen** – if it is not possible to take notes at the time, do so immediately afterwards. Keep the notes taken at the time, without amendment, omission or addition, whatever subsequent reports may be written. The notes should be dated and signed. The notes should cover what you saw, who said what, what action you took, and the details of date, time and location and names of child and perpetrator.
22. Then follow the steps in Section 5.

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Section 3. Immediate action to take if you receive an allegation of possible significant harm to a child or young person

If you are in direct contact with the person raising the concern, for instance through a telephone call, or receipt of a complaint.

- **Stop other activity and focus on what you are being told, or have just seen.** Responding to suspicion of abuse takes immediate priority.
 - **Do not promise confidentiality** or agree to 'keep it a secret'. Explain clearly to the person raising the concern about what you expect will happen next. You can assure them that you will only tell those you have to tell to try to get the matter dealt with. You can and should express support and reassurance to the person giving you the information, particularly if it is a child or young person, that the matter will be dealt with quickly and appropriately.
 - **It is absolutely vital that you avoid any action that could jeopardise subsequent investigations, including legal proceedings. In particular, avoid asking leading questions** like 'Did he do X to you?' or 'How did he hurt the young person' but confine yourself to open questions like '**Can you tell me what happened?**' and '**What happened next?**' or '**Who said that?**'
23. **Ask only what you need to know** to come to a judgement about whether abuse may have taken place and to gather factual details. You do not need full details but do need sufficient information for an informed referral:
- details of the concern or allegation
 - name, date of birth and address of the child or young person
 - details of where the abuse took place
 - if possible, additional relevant information regarding the child, for example ethnicity and details of other agencies involved.
24. If talking with a child then work at their pace – do not rush them. Avoid expressing opinions.
- **Consider whether immediate action is needed to secure the protection of any children or young people who may be at risk.** Think about the child or young person who is the immediate subject of the concerns, **and any other child or young person** who may be at risk, in light of what you have been told or suspect.
 - **If you are onsite** with any children or young people, who may be at immediate risk, consider what action may be necessary to secure their safety. You will need to stay with those you think are at immediate risk until you can transfer them to the care of another responsible adult. Then you will need to contact the senior staff member on site.

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- **If you are not onsite** with a child or young person, discuss how they may make themselves safe. Take into account the child's or young person's wishes about any immediate protection. Check whether any other children may be at risk and consider what action is necessary to secure their immediate safety.
- **Take notes of what has been said, what you have heard or seen and what you did** – if it is not possible to take notes at the time, do so immediately afterwards. Keep the notes taken at the time, **without amendment, omission or addition**, whatever subsequent reports may be written. Wherever possible, try to write down what was said verbatim, and make it clear (for example, by using quotation marks) where your notes record somebody's actual words. **Notes should be dated and signed.**
- **Follow the steps in Section 4 below.**

If you are not in direct contact with the person raising the concern, for instance if you have received a letter or email.

- **Stop other activity and focus on what you are being told.** Responding to suspicion of abuse takes immediate priority.
- **Retain any written records including emails and letters.**
- **Follow the steps in Section 4.**

Section 4. Identification of level of concern and next steps

25. In all cases:

- **Do not, at this stage, tell the person who is the subject of an allegation or suspicion** what you have been told or what you suspect – that may put a child or young person at further risk and/or jeopardise any subsequent enquiry.
- **Do not investigate the case yourself.** While professionals should seek, in general, to discuss any concerns with the child and family and, where possible, seek their agreement to making referrals to local authority children's social care, **this should only be done where such discussion and agreement-seeking will not place a child at increased risk of suffering significant harm.**
- **Decide whether the allegation or suspicion indicates that a child or young person may be suffering, or is at risk of suffering, significant harm** ('significant harm' is the trigger for children's social care services and/or subsequent police enquiries. the allegation or suspicion would constitute a child or young person suffering, or being at risk of, significant harm
 - the actual or likely harm is of a sexual, physical, emotional or neglect nature, or involves witnessing domestic violence, sufficient to affect the

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child's or young person's normal physical, sexual, emotional, educational or social development.

- **Remember**, whether or not you personally believe what is said, the benefit of the doubt must always be in favour of making the report. You do not personally have to believe the concern to be true to make a referral. This assessment is for children's services and/or the police to make. False allegations, even anonymous ones, are relatively rare.
- If the concerns are identified outside of normal office hours and the line manager is unavailable, decide whether there is an immediate risk to the child. If so, contact the relevant Emergency Duty Team of the children's social care services. This will usually be via the main switchboard number of the local authority. If this presents a problem, contact the police.

26. Follow the steps in Section 5 below

Section 5. Allegations about a member of Norpro Training staff

Decide whether any immediate action needs to be taken in line with Sections 2 and 3 of the procedure and then contact the principal officer.

- Where concerns are reported about any company staff member, they should always be passed to the Manager in line with *Working together to safeguard children*.
- These colleagues are the senior managers to whom all allegations or concerns that a member of staff, or someone working on behalf of Norpro Training, may have abused a child should be reported. If no senior manager is available, then the Chair of Norpro Training's is to be contacted, details of which can be sought through reception at both North Prospect Garage Project and Bladon's Boat yard.
- The Manager will coordinate decisions and any actions to be taken, including any referral to children's social care services/police and any subsequent actions by Norpro Training.
- If allegations or concerns are raised with regards to the Manager then the staff should contact the Chair of Norpro Training.

Part 3. Safeguarding vulnerable adults

Policy and procedures

27. The legal and policy basis for responding to concerns regarding the safeguarding and welfare of vulnerable adults is entirely different from that for children and young people. *Working together to safeguard children* only applies to children and young people up to when they reach the age of 18. Any incident or concerns relating to a young person or adult of 18 years and over, even if still at school, are not covered by Local Safeguarding Children's Boards or their

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procedures. Government guidance in relation to adults is contained in the document 'No Secrets' and the previous Protection of Vulnerable Adults guidance (now Adult's List guidance). Good practice guidance is also available through the Association of Directors of Social Services publication *Safeguarding Adults: A national framework of standards for good practice and outcomes in adult protection work*.

28. Norpro Training is committed to working with other agencies to ensure that people in settings that we deliver services are safeguarded. People who use services have a right to live and work in environments free from abuse, neglect and discrimination.
29. Norpro Training does not investigate issues of concern in relation to vulnerable adults. Local councils and the police hold the lead responsibilities for responding to allegations of abuse in relation to adults and in coordinating the local interagency framework for safeguarding adults.
30. Norpro Training will bring to the attention of the social services and police any concerns or allegations identified through any part of its work.
31. Abuse is a violation of an individual's human and civil rights by other person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.
32. A vulnerable adult is defined by the Safeguarding Vulnerable Groups Act 2006 as a person who is aged 18 years or over and who:
 - is living in residential accommodation, such as a care home or a residential special school
 - is living in sheltered housing
 - is receiving domiciliary care in their own home
 - is receiving any form of healthcare
 - is detained in lawful custody (in a prison, remand centre, young offender institution, secure training centre or attendance centre, or under the powers of the Immigration and Asylum Act 1999)
 - is under the supervision of the probation services
 - is receiving a welfare service defined as the provision of support, assistance or advice by any person, the purpose of which is to develop an individual's capacity to live independently in accommodation or support their capacity to do so
 - is receiving a service or participating in an activity for people who have particular needs because of their age or who have any form of disability

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- is an expectant or nursing mother living in residential care, or
- is receiving direct payments from a local authority or health and social care trust in lieu of social care services.

33. Within this context abuse can take the form of:

- physical abuse – including hitting, pushing, kicking, misuse of restraint or inappropriate sanctions
- sexual abuse – including sexual assault or acts to which the adult did not, or could not consent
- psychological abuse – including emotional abuse, threats, deprivation of contact, humiliation, intimidation, coercion, verbal abuse, isolation or withdrawal from services
- financial or material abuse – including exploitation and pressure in connection to wills, property, inheritance or financial transactions
- neglect or acts of omission – including ignoring medical or physical care needs, withholding of medication or adequate nutrition and failure to provide access to appropriate health, social care or educational services
- discriminatory abuse – including racist, sexist and other forms of harassment.

Procedure for responding to safeguarding concerns relating to vulnerable adults

34. The principles for staff in identifying and responding to incidents of concern in relation to adults are the same as those for children and young people. In most cases exactly the same process and guidance outlined in **Part 2 – Sections 1 to 5** will need to be followed by the staff member.

35. **In summary** if an act of abuse or neglect of a vulnerable adult is identified or suspected then Norpro Training staff member should:

- stop everything else and concentrate on what you are observing or being told
- ensure the immediate safety of the vulnerable adult (and any other persons)
- do not promise confidentiality or agree to keep something secret
- do not investigate yourself and avoid asking leading questions
- obtain the necessary information to make an informed referral
- contact the manager to discuss next steps and appropriate action
- advise the senior manager within the setting – or an external manager if appropriate
- make and keep a record of the incident and actions taken.

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Annex 1. Definitions

Abuse and neglect

The following definitions are taken from *Working together to safeguard children* (DCSF (now DFE): March 2010).

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The concept of significant harm

Some children are in need because they are suffering or likely to suffer significant harm. 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, and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or is likely to suffer significant harm.

A court may make a care order (committing the child to the care of the local authority) or supervision order (putting the child under the supervision of a social worker, or a probation officer) in respect of a child if it is satisfied that:

- the child is suffering, or is likely to suffer, significant harm, (including impairment suffered from seeing or hearing the ill-treatment of another); and
- the harm or likelihood of harm is attributable to a lack of adequate parental care or control (section 31 of the Act).

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. Each of these elements has been associated with more severe effects on the child, and/or relatively greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm, for example, a violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the child's own assessment of his or her safety and welfare, the family's strengths and support services, as well as an

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assessment of the likelihood and capacity for change and improvements in parenting and the care of children and young people.

Protection of vulnerable adults

Alongside Norpro Training's responsibility to safeguarding children and young people, it has equal regard and concern for safeguarding vulnerable adults who are not covered by child protection legislation.

Norpro Training staff should be aware of their responsibility towards vulnerable adults and to contribute to preventing further abuse if they are made aware of it.

The basis for the following is Department of Health guidance detailed in *No Secrets* (2000) and the Protection of Vulnerable Adults (2004) and reflected in the 'Adult List' requirements of the Safeguarding Vulnerable Groups Act 2006.

A vulnerable adult is defined by the Safeguarding Vulnerable Groups Act 2006 as a person who is aged 18 years or over and who:

- is living in residential accommodation, such as a care home or a residential special school
- is living in sheltered housing
- is receiving domiciliary care in their own home
- is receiving any form of healthcare
- is detained in lawful custody (in a prison, remand centre, young offender institution, secure training centre or attendance centre, or under the powers of the Immigration and Asylum Act 1999)
- is under the supervision of the probation services
- is receiving a welfare service defined as the provision of support, assistance or advice by any person, the purpose of which is to develop an individual's capacity to live independently in accommodation or support their capacity to do so
- is receiving a service or participating in an activity for people who have particular needs because of their age or who have any form of disability
- is an expectant or nursing mother living in residential care
- is receiving direct payments from a local authority or health and social care trust in lieu of social care services.

Note, however, that people are not vulnerable adults just because of any learning difficulty or learning disability. They will be defined as vulnerable adults when they receive health, social care or other services, or activities specifically for those with learning difficulties and/or disabilities.

Adults considered to be vulnerable in the above definition may have a range of learning difficulties and/or disabilities, including: mental health difficulties, significant behavioural and emotional difficulties; cognitive learning difficulties, including severe and complex learning disability; sensory disability; and speech and language

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disability and communication disorders, including autistic spectrum difficulties and Asperger's Syndrome.

This is not a complete list nor does it imply that all learners who have such learning difficulties and/or disabilities should be considered to be a vulnerable adult. All incidents and concerns must be reported initially to the Manager.

What is meant by abuse in the context of vulnerable adults?

In addition to definitions provided above, in the context of vulnerable adults the following outlines the main forms of abuse:

- **physical abuse**, including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions
- **sexual abuse**, including rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting
- **psychological abuse**, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks
- **financial or material abuse**, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
- **neglect and acts of omission**, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
- **discriminatory abuse**, based on disability, gender, race, age, religion or belief, gender reassignment and sexual orientation and other forms of harassment, slurs or similar treatment.

Incidents of abuse may be **multiple**, either to one person in a continuing relationship or service context – or to more than one person at a time. Patterns of abuse and abusing vary and reflect very different circumstances. These include:

- serial abusing in which the perpetrator seeks out and 'grooms' vulnerable individuals. Sexual abuse usually falls into this pattern as do forms of financial abuse
- long-term abuse in the context of an ongoing family relationship such as domestic violence
- opportunistic abuse such as theft
- situational abuse which arises because pressures have built up and/or because of difficult or challenging behaviour

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- neglect of a person's needs because those around him or her are not able to be responsible for their care, for example, if the carer has difficulties attributable to such issues as debt, alcohol or mental health problems
- institutional abuse which features poor care standards, lack of positive responses to complex needs, rigid routines, inadequate staffing and insufficient knowledge base within the provider or service
- unacceptable 'treatments' or programmes with sanctions or punishments such as withholding food and drink, seclusion, unnecessary and unauthorised use of control and restraint, or over-medication
- failure to ensure staff receive appropriate guidance on anti-racist and anti-discriminatory practice
- failure to access key services such as health care and dentistry
- misappropriation of benefits and/or use of the person's money by other members of the household
- fraud or intimidation in connection with wills, property or other assets.

Some instances of abuse will constitute a criminal offence. In this respect vulnerable adults are entitled to the protection of the law in the same way as any other members of the public. In addition, statutory offences have been created which specifically protect those who may be incapacitated in various ways. Examples of actions which may constitute criminal offences are assault, whether physical or psychological, sexual assault and rape, theft, fraud, and other forms of financial exploitation, and certain forms of discrimination, whether on racial or gender grounds.

Alleged criminal offences differ from all other non-criminal forms of abuse in that the responsibility for initiating action invariably rests with the state in the form of the police and Crown Prosecution Service. While private prosecutions are theoretically possible, they are exceptional in practice. Accordingly, when complaints about alleged abuse suggest that a criminal offence may have been committed it is imperative that reference should be made to the police as a matter of urgency. Criminal investigation by the police takes priority over all other lines of enquiry.

Non-criminal forms of abuse must be also treated with the highest priority. These should be brought to the attention of the senior management and governing body/trustees/proprietors. Such instances may also require referral to other statutory agencies, including local social service departments, Norpro Training and the Care and Social Services Inspectorate Wales as appropriate.

Company staff should ensure that education and training settings follow recent guidance from the Department of Health. This guidance on the Adults List (previously the Protection of Vulnerable Adults) requires providers who provide services for vulnerable adults to carry out stringent pre-employment checks on all staff.

The procedure to be followed by all Norpro Training staff are identical to suspected abuse involving children or young adults.

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Forced marriage

Forced marriage and honour-based violence are human rights abuses and fall within the Government's definition of domestic violence. Forced marriage is defined as a marriage conducted without the full consent of both parties and where duress is a factor. There is a clear distinction between forced marriage and an arranged marriage. In arranged marriages, the families may take a leading role in arranging the marriage, but the choice of whether or not to accept remains with the prospective spouses. In a forced marriage, one or both spouses do not consent to the marriage. The young person could be facing physical, psychological, sexual, financial or emotional abuse to pressure them into accepting the marriage.

Many of these acts are committed against children. The Government's Forced Marriage Unit has produced guidelines, in conjunction with the DCSF (now DfE), on how to identify and support young people threatened by forced marriage.

Procedure

Again, the procedure to be followed by all Norpro Training staff is similar to that when other types of abuse involving children or young adults is suspected. However, if a child appears to be at immediate risk, refer to section 3 this policy for further advice on action to be taken.

Annex 2. Complaints or concerns about our staff

Norpro Training will seek to ensure that children and young people, parents and carers, members of the public and service providers and our employees have ready access to us if they have concerns about the conduct of our staff or those undertaking work on our behalf.

We have rigorous procedures in place to ensure that the individuals who are recruited into Norpro Training posts are fit and suitable for those posts and we have robust policies which enable us to follow up quickly any allegations about the conduct of our own staff.

The responsible manager in Norpro Training's team works closely together with the directors to ensure that any safeguarding concern relating to a Company employee is dealt with quickly and appropriately.

Pre-employment

Recruitment and pre-appointment checks

During the recruitment process, Norpro Training routinely checks an individual's suitability for working in Norpro Training in various ways.

At sift stage, we analyse application forms and CVs to assess that the individual has the appropriate skills, knowledge and background to undertake the duties of the post they are applying for. We also look for any gaps in employment and will challenge these with the individual if necessary. During interviews we will ask specific questions around the protection of children to ascertain whether the individual is suitably aware of potential risks to children, young people or vulnerable adults.

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When an offer of employment is made, we routinely check the individual's suitability for the post through occupational reference checking. Individuals have to provide two referees, one of whom must be their last employer. Where any information is falsely submitted or where information is provided which gives cause for concern we may withdraw any conditional offer of employment if considered necessary.

Disclosure & Barring Service (DBS)

Refer to Norpro Training DBS Policy.

During employment

Complaints

A complaint about the conduct of a company employee may come through various routes. These include:

- through ISA referrals or notifications
- through our formal complaints procedure
- through other correspondence from the public
- through one of Norpro Training employees making a complaint about the conduct of another of Norpro Training employees. This may be made through Norpro Training's **whistleblowing policy** but any subsequent investigation and action would be carried out according to the safeguarding procedure and the disciplinary policy.

However we receive the complaint, Norpro Training will ensure that all complaints are treated with due care and attention, considering the expectations of the public and also the fair treatment of our employees. Where the complaint involves a safeguarding issue, this should immediately be referred to the Manager.

Norpro Training's external complaints procedure

Norpro Training has a formal complaints policy in place. This policy provides details of how to make a complaint and to whom it should be addressed, depending on the type of complaint.

Disciplinary process

This escalated disciplinary process will apply where an employee is suspected and/or accused of, or deemed to have acted in contravention of the safeguarding policy. This applies where there is a child protection issue because of an employee's action or as a result of their inaction, whether wilful or because of negligence. Depending on the circumstances, this may also include a capability review. Additionally, the policy may apply where a family member or an acquaintance of an Norpro Training employee is implicated in, suspected and/or accused of a matter related to abuse of a child or children where there is evidence that the employee had knowledge of the activity and did nothing.

Legal proceedings

Norpro Training may be able to support employees who are the subject of legal proceedings, whether related to their work or in their private life, where this is appropriate and provided this does not put Norpro Training's reputation at risk, such

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as where the allegation is related to a failure to safeguard the welfare of children or young people.

Trade Unions

If any allegation is made against them, employees are advised to contact their trade union officer who will be able to provide support and representation at any disciplinary hearing.

Post-employment

Recruitment and pre-appointment checks

Norpro Training reserves the right to disclose information about an ex-employee where they have been disciplined and/or dismissed for misconduct, including where that is related to a safeguarding issue. Referrals to the ISA of Norpro Training staff who have been dismissed or left our employment because of a safeguarding issue is also a statutory requirement since 12 October 2009.