

CN4C Safeguarding Policies and Procedures

Name of policy	Safeguarding Policy and Procedures
Name of person responsible	Emma Wooderson Designated Safeguarding Lead Barbara Ellenbroeck Designated Trustee
Approved by	Board of Trustees
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SAFEGUARDING POLICY

1. Scope

1.1. The Policy and Procedures set out in this document and the various appendices apply to all sites and activities that form part of CN4C, including work-based learning, all off site activity including CN4C-led trips and off-site events organised and/or led by staff, sessional workers or volunteers.

1.2. Our policy and procedures apply to all service users, staff/governors, visitors, contractors, volunteers, advisory board members, staff from partner organisations working on our sites and those organisations using or hiring CN4C sites or facilities for use whilst the CN4C has service users also using those premises.

2. Statutory Obligations

2.1. CN4C places the highest importance on safeguarding; the safety and well-being of service users and staff are paramount in all activities. Furthermore, CN4C recognises that members of staff and service users themselves have an important role to play in being vigilant to safeguard the welfare of children, young people and adults and prevent abuse.

2.2. CN4C has a statutory duty under Section 175 of the Education Act, 2002 to have in place arrangements for carrying out its functions with a view to safeguarding and promoting the welfare of children, young people and adults who may be vulnerable in line with the definition set out in The Care Act, 2014. This policy sets out a framework for those arrangements and should be read in conjunction with the web links provided and various appendices attached including our Safeguarding Procedures.

2.3. This policy takes into account, amongst others, the following publications, including recent/relevant guidance and legislation in this area:

- Working Together to Safeguard Children, 2026
[Working together to safeguard children 2026](#)
- 'Keeping Children Safe in Education' which is the key statutory document for safeguarding in schools and colleges. (Department for Education, September 2026)
[Keeping children safe in education - GOV.UK](#)

In addition to the full guidance document, the Department for Education have published part one of this as a separate document 'Keeping children safe in education: information for schools and college staff' addressed to all staff working in schools and colleges. [Keeping children safe in education 2025](#)

Other relevant Guidance includes:

- Section 11 'Children Act', 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014 (safeguarding adults)

- The Counter-Terrorism and Security Act 2015 [Counter-Terrorism and Security Act](#)
- Statutory FGM Police reporting requirements for those working with under 18s in education (effective from 31/10/15) [Mandatory Reporting of Female Genital Mutilation – procedural information](#)

2.4. Our policy and procedures are in accordance with those set out on the South West Child Protection website and the guidance issued by the local Children's and Adults' Safeguarding Boards in Cornwall, Devon and Bristol.

2.5. Our policy and procedures, together with further reference information documents, are disseminated and made accessible to all staff (as well as service users and parents/carers). This information is supported by regular face to face and online training inputs by our trained safeguarding leads.

2.6. Our Designated Safeguarding Lead has undertaken Level 4 Designated Safeguarding Officer training.

2.7 Our Safeguarding Leads have all completed the Level 3 Safeguarding training within the required timeframe and have also attended regular CPD on specialist safeguarding areas such as Child Sexual Exploitation, Domestic Abuse, FGM, Prevent etc.

2.8. Key staff role abbreviations:

DSL –Designated Safeguarding Lead – Emma Wooderson for the organisation/
 Sarah Spargo for Young People

SLs – Safeguarding Leads –Rhisiart Talebot, Rachel Elford, Emma Lankford,
 Amber Hindmarch, Simon Centofani, Benigale Richards, Naomi Smith, Tazmin
 Hook, Matt Durham, Emma Waters, Emma Carlyon, Roxy Durran, John
 Willoughby, Emily Wootton, Mel Harvey.

SMG – Safeguarding Management Group – Tarn Lamb

LADO – Local Authority Designated Officer

Contact details for the above can be found in Appendix B

3. Definitions

3.1. A child is defined as any young person under the age of 18 years.

3.2. An adult who may have safeguarding needs is defined in The Care Act, 2014 as an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and
- is experiencing or at risk of abuse or neglect and
- a result of those care and support needs, is unable to protect themselves from either the risk of or the experience of abuse or neglect

This provides a very broad definition of adults who may need safeguarding support (e.g. individuals who may have mental health needs, be in a harmful or controlling relationship, live in a domestic abuse environment, suffer from self-harm or self-neglect, or have a physical, learning or mental health disability etc.)

4. Key Principles

CN4C will ensure that:

- the safety and well-being of children, young people and adults are paramount in all areas of its operations, including safeguarding our staff/service users and raising their awareness to safeguard themselves and others.
- all children and adults, regardless of age, culture, disability, gender, language, racial origin, religious belief and or sexual identity can exercise their right to protection from harm or abuse when engaged in CN4C-related activity or settings and CN4C support where they may disclose concerns about their broader lives in the community or at home.
- all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately, with due regard to appropriate levels of privacy and the dignity of those concerned.
- all staff will be made aware of key safeguarding principles/practice through appropriate training and are required to report any disclosures, concerns or allegations in line with our procedures.
- “Safer Recruitment” best practice is used when recruiting staff/volunteers to ensure their suitability to work with children and adults who may be vulnerable and when dealing with others who visit/use our sites.
- we work in a proactive partnership with other key statutory and voluntary sector organisations to share information and good practice to improve safeguarding within our communities.
- We act in accordance with the statutory guidance “Working Together to Improve School Attendance.” Persistent or severe absence should be recognised as a potential safeguarding concern, triggering early help where appropriate.
- Children and young people who may benefit from early help are identified and supported as soon as possible.
- Staff are alert to circumstances that may indicate a need for additional help or raise safeguarding concerns, including persistent or prolonged absence from education and the needs of children in kinship care.
- Alternative Provision – Where a learner is placed in alternative provision, the DSL must obtain written assurance from the provider that the appropriate safeguarding checks are in place and that they will share any safeguarding concerns immediately. CN4C retains overall responsibility for the learner’s welfare while off-site.
- All staff and governors should reference the DfE’s “Data Protection: a Tool kit for Schools” when handling safeguarding information, ensuring that information sharing is lawful, necessary, and appropriate. [Data protection in schools - Guidance - GOV.UK](https://www.gov.uk/guidance/data-protection-in-schools)
- we adhere to any statutory responsibilities placed upon us, such as those outlined in the new Counter Terrorism and Security Act 2015.

5. Responsibilities

5.1 The Governing Body of CN4C is responsible for ensuring that:

- CN4C has safeguarding policy and procedures in place that are in accordance with statutory requirements and local authority guidance and that these are published and reviewed annually or where required due to changes in policy.
- Training is in place for all staff, appropriate to their roles.
- The Board receives and considers regular safeguarding update reports.
- CN4C operates 'safer recruitment procedures' in accordance with statutory requirements.
- CN4C has procedures for dealing with allegations of abuse against staff and volunteers that comply with the Local Safeguarding Children Board (LSCB) and Safeguarding Adults Board (SAB) guidance.
- A member of the Governors is nominated to take a lead on safeguarding matters and undertakes appropriate training in this. Currently this is Barbara Ellenbroek.
- The Chair liaises with the Local Authority and /or partner agencies in the event of allegations of abuse being made against the CEO.
- Any deficiencies or weaknesses regarding safeguarding arrangements are remedied without delay.
- A senior manager is designated to take the lead responsibility across CN4C for safeguarding – to be referred to as the Designated Safeguarding Lead (DSL). Currently this is Emma Wooderson

5.2 The Designated Safeguarding Lead, Emma Wooderson Adults, Sarah Spargo Young People is responsible for ensuring:

- Explicit oversight of attendance monitoring in collaboration with attendance leads, recognising persistent or severe absence as a safeguarding concern and triggering early help.
- Publication and correct implementation of the policy and procedures and reviewing the effectiveness of them.
- Provision of regular reports to Governors on safeguarding matters – staff training, volume and types of referrals, trends, allegations related to staff etc.
- Safeguarding training, appropriate to role, is in place for all staff and is delivered in a timely fashion, in line with national and local guidance.
- Completion of external and internal audits related to the effectiveness of safeguarding.
- Oversight of the recording and passing on to external agencies, where appropriate, any disclosures received and liaising with the Local Authority Designated Officer (LADO) on any staff related matters, where required.
- The appointment of Safeguarding Leads who are appropriately trained and supported.
- Logging and receipt of incoming safeguarding files and the passing on of these files/key information to relevant staff through the Safeguarding Leads.
- That safeguarding files are kept securely and in line with archiving requirements set out in national/local guidance.
- That the Safeguarding Management Group (SMG) receives appropriate safeguarding information and advice in all cases where allegations of abuse have been made against a member of staff (The Chair of The Board if allegations concern the CEO).
- Effective liaison with the Local Safeguarding Children's Boards and the Safeguarding Adults Boards (Cornwall, Devon and Bristol).

- That a robust risk assessment process is in place for those service users/applicants who may pose a risk to other service users and staff in respect of unspent criminal convictions or other indications of potential risk.
- The undertaking of their own regular update training to inform policy, procedure and practice and completing statutory refresher training every 2 years.
- Good practice and “learning lessons” information is shared amongst the safeguarding leads and with the wider group of staff.
- Policy and Procedures are updated and disseminated to staff/service users as appropriate.
- Those who use our premises or provide site-based service to our service users are aware of our safeguarding policy and procedures and agree to abide by these via a Letter of Assurance that will be held with our Single Central Record.

5.3 Safeguarding Leads (SLs) are responsible for:

- Awareness of the new online safety threats such as misinformation, disinformation, conspiracy theories , and generative AI content.
- Receiving, recording and passing on to external agencies, where appropriate, disclosures concerning abuse, in accordance with procedures.
- Liaising with the DSL, as appropriate.
- Carrying out risk assessments in line with our Admissions and Safeguarding Policy and Procedures, ensuring the implementation of risk control measures.
- Contributing to safeguarding training for all staff.
- Working with colleagues to raise the awareness of safeguarding amongst participants and encouraging concerns to be reported.
- Attending Tier 3 Safeguarding training every 2 years and other safeguarding related continuous professional development to keep up to date with policy and best practice developments.
- Supporting and advising colleagues with potential safeguarding concerns about service users.
- Effective and secure record keeping in respect of participant files, allegations and referrals.
- Providing management information on safeguarding incidents and trend analysis for service development and reporting to senior managers and governors.

5.4. The Safeguarding Management Group (SMG)

Where an allegation of abuse is reported that implicates a member of staff, governor or volunteer, the Safeguarding Management Group will be convened and is responsible for:

Responding quickly and appropriately to allegations of abuse made against staff/volunteers in line with the guidance set out below and overseeing any investigation or external reporting related to this.

The SMG will comprise of:

- The Designated Safeguarding Lead
- The Chief Executive Officer
- A Board Representative

5.5. All staff members/volunteers are responsible for:

- Familiarising themselves with Part One of 'Keeping children safe in education: information for all school and College staff' addressed to all staff working in schools and CN4C [Keeping children safe in education 2024: part one \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- Familiarising themselves with CN4C's Safeguarding Policy and Procedures
- Promoting awareness of safeguarding issues/support amongst service users and colleagues.
- Protecting themselves by being familiar with and adhering to the Staff Professional Code of Conduct and key Safeguarding Policy, Procedures and Guidance.
- Attending safeguarding training as required, in accordance with guidelines (on induction and as a refresher at least once every 3 years).
- Reporting to a Safeguarding Lead any suspicion, allegation or disclosure of abuse to a child, young person or adult who may have safeguarding needs. While we would encourage staff to report via Safeguarding Leads as they may already be aware of issues
- and/or liaising with other agencies in respect of these, ANY member of staff can make a referral in respect of safeguarding concerns to the Multi Agency Referral Units located within the relevant local authority. See Appendix for contact details and links to referral forms.
- Reporting to a Safeguarding Lead any welfare concerns that they may have or may need support with.
- Reporting to the DSL any potential criminal charges or personal issues that may have a bearing on their on-going 'suitability' to work in an educational environment with young people and vulnerable adults.
- Reporting to the relevant line manager or DSL any concerns they may have about the conduct of colleagues in relation to Safeguarding and our Staff Code of Conduct.

5.6. Service users are responsible for:

- Maintaining a vigilant approach to the safety and welfare of themselves, their peers and others on site.
- Reporting any concerns to either a safeguarding lead or any other member of staff with whom they feel comfortable discussing these.
- Abiding by CN4C Code of Conduct which is designed to safeguard all those on our sites or using our facilities, including out IT network.

6 Safer Recruitment and Selection

6.1 CN4C pays full regard to the guidance set out in Chapter 3 of 'Keeping children safe in education: information for all school and College staff' (Department for Education, September 2022) which details guidance around Safer Recruitment.

6.2 CN4C's recruitment policy and procedures ensure that all appropriate measures are applied in relation to everyone who works in CN4C, staff and volunteers, and staff employed by external partners/contractors, including:

- Verifying identity and academic or vocational qualifications.
- Obtaining professional and character references and checking previous employment history, specifically focussing on gaps in employment history.
- Obtaining an enhanced DBS disclosure for all new appointments to CN4C's workforce, who will be involved in working with young people and vulnerable adults or who will work on sites where these groups study.
- Applying additional checks to all new employees who are non- European Economic Area (E.E.A.) nationals.
- Keeping a single central record detailing the range of pre-employment checks carried out on staff.
- Ensuring that managers leading recruitment panels are trained in Safer Recruitment practice and kept up to date with any changes in guidance related to this.
- Recruitment panels will be aware of the updates in KCSIE 2026 relating to regulated activity and DBS checks.

7. Other individuals working on CN4C sites/provision

- Visitors to CN4C sites must be directed to sign in.
- Contractors operating on the premises are required to agree to and abide by safeguarding conditions set out by CN4C such as signing in as visitors.
- Other organisations working with service users on CN4C premises are required to sign a Letter of Assurance to agree to comply with CN4C Safeguarding Policy and Procedures. This also applies to any organisations renting or using space on CN4C premises.
- In the case of service users directly employing their own support worker, CN4C reserves the right to require a completed Application Form to carry out this role on any of our sites or within any of our provision and to have sight of the individual's DBS clearance certificate in order to safeguard service users and staff. These processes must be completed before any directly employed support worker comes on site to provide support.

8. Safeguarding Policy and Procedure updates

8.1. Our Policy will be reviewed, updated and approved by Governors on an annual basis or more frequently if there are changes to national or local guidance.

8.2. Our Procedures and supporting guidance will be reviewed on a regular basis, at least annually and as part of national/local case reviews and "learning lessons" data and in the light of feedback from staff or service users.

Appendix A – Safeguarding Procedures

Dealing with a disclosure (to be read in conjunction with Safeguarding guidance material – see below)

1. Context

- 1.1. All complaints, allegations or suspicions of abuse must be taken seriously, and staff must not adopt a “couldn’t happen here approach.”
- 1.2. Absolute promises of confidentiality must not be given as the matter may develop in such a way that these might not be able to be honoured. This must be made clear at the outset to the individual who is making a disclosing, with reassurance that they are doing the right thing and information will only be passed on to those who need to know this to safeguard them and others.
- 1.3. If the complaint/allegation comes directly from the child/young person/vulnerable adult, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must always be avoided.

2. Procedure

It is recognised that any member of staff may come in contact with service users who make a safeguarding disclosure or who exhibit a safeguarding ‘cause for concern’. No member of staff should take any independent action themselves but must observe the protocol set out below, unless the individual is in crisis, in which case action should be taken to stabilise the situation in consultation with relevant managers. Anyone has the right to make a referral to the Multi Agency Safeguarding Unit, based within the local authority but the advised route is through a Safeguarding Lead who are all safeguarding trained.

- 2.1 Any suspicion, allegation or incident of abuse must be reported to a SL or the DSL, as soon as possible.
- 2.2 If the suspicion or allegation of abuse is related to a member of staff or other person in a “position of power”, it must be reported to the DSL, as soon as possible.
- 2.3 Brief notes of the detail of anything said as part of the disclosure should be made with a full record of any disclosure conversations made immediately after any conversations with the child/young person/ adult and must include, if known:

The date and time of the alleged abuse

- The place where the alleged abuse happened
- The child/young person/ adult’s name
- The name of the person making the disclosure
- The nature of the alleged abuse
- A description of any injuries observed (N.B. do not ask to see)

- The account which has been given of the allegation (if disclosed directly by the child/young person/ adult, the account should be in their words)
- The age of the child/young person/adult
- If a vulnerable adult, is there anything to suggest that they may not have “capacity” – i.e. Mental capability?
- The address of the child/young person/ adult
- The date and time of the observation/disclosure
- SL name and the names of any other persons present.

The record should be, as far as possible, verbatim rather than summarised and it should be factual in terms of what the child/young person/e adult or person making the disclosure (where not a direct disclosure) has reported and should not be based on staff opinion or assumptions.

NOTE: Some children/young people/e adults with learning difficulties and/or disabilities may need additional support when making a disclosure. This may take the form of the child/young person/ adult’s nominated carer or tutor being present at any interview to act as a facilitator or in an advocacy role. It should NEVER be assumed that a child/young person/ adult with learning difficulties and/or disabilities is not capable of providing a credible account.

- 2.4 The SL/DSL will record details of the suspected/alleged abuse (as per 2.3) and should refer the matter to the Multi Agency Support and Safeguarding Hub (MASSH), where they feel that the child/young person/vulnerable adult may be in need and/or may be at risk of suffering significant harm or that others (e.g. siblings) may be at risk of harm. If in any doubt the MASSH should be contacted for advice if not a formal referral. Advice should be recorded including the name of the person providing this advice, date and time.
- 2.5 The SL/DSL will confirm any telephone referral in writing, using the appropriate referral form within 1 working day.
- 2.6 The advice received from the MASSH on what action, if any, is to be taken, should be noted, dated and kept on file, including the name of the member of staff spoken to.
- 2.7 Any further action to be taken by CN4C, agreed with the MASSH should be noted, dated and the SL/DSL needs to confirm that this action is being/has been taken. This should include any conversation with parents/carers which will not always be appropriate if allegations include family members and the wishes of the individual concerned, providing they have capacity.

4. Work Placements

- 4.1 Employers and training organisations will be required to co-operate with CN4C in putting in place and subscribing to appropriate safeguards. Failure to do this will result in CN4C not using them as a work experience placement provider.
- 4.2 Where a placement is long term or meets the criteria laid out in 'Safeguarding Children and Safer Recruitment in Education' (DofE, 2012), CN4C will ensure that additional safeguards are in place as set out in CN4C's Work Placement Policy, including carrying out of DBS checks on service users who will be working with children and adults in placements such as schools, nurseries, playgroups, leisure centres, care homes etc. DBS checks must be completed prior to the placement starting.

5. Allegations about a Member of Staff or Volunteer

- 5.1 Any suspicion, allegation or actual abuse of a child, young person or adult who may be deemed as "vulnerable" by a member of staff/volunteer must be reported to the DSL as soon as possible and in any case within 2 hours of the initial concern arising. If the DSL cannot be contacted another SL or another senior member of staff should be contacted.
- 5.2 The DSL will take such steps as s/he considers necessary to ensure the immediate safety of the child/young person/ adult in question or any other person who may be considered at risk (e.g., other service users).
- 5.3 The DSL will immediately notify the CEO and convene the Safeguarding Management Group (SMG). The SMG will rapidly consider the nature of the allegation and any evidence. The SMG will consider whether actions need to be taken to suspend or move the staff member or participant to safeguard them or any future investigations. Any suspension is viewed as a neutral act and does not assume guilt or innocence.
- 5.4 Written statements may be taken from anyone who may have witnessed anything relevant to the allegation. This should simply be an account, in the witnesses' own words as to what they may have observed. Care must be taken not to ask any leading questions or to "interrogate" any witness. Statements must be signed and dated by the witness.
- 5.5 Where it is clear to the SMG that a child/young person/vulnerable adult appears to have been harmed or is at risk of significant harm or a criminal act appears to have been committed:
 - An immediate referral will be made to the MASSH in respect of the alleged victim
 - The DSL will also inform the relevant Local Authority Designated Officer within 1 working day of receiving the report of an allegation and ensure that a report has been completed. The DSL will supply the staff member's

address, date of birth, post and length of time in employment with CN4C, together with any copies of notes/statements related to the allegation.

- CN4C will inform the alleged perpetrator or person about whom there is a concern of the allegation or concern as soon as possible AFTER consulting with the LADO and in accordance with any restrictions on information sharing that may be imposed by the police or social care. There may be circumstances where this would impede a police prosecution.
- The DSL/CEO will inform the alleged perpetrator/person against whom the concern has been raised how enquiries will be conducted and possible outcomes e.g., disciplinary action, dismissal etc. and inform them of sources of support e.g., professional organisations/trades union and the role of CN4C HR function in providing support. The DSL and CEO will ensure that CN4C operates within its Staff Disciplinary Procedure

- 5.6 Managers will not take any action that might undermine any future action or disciplinary procedure (e.g., interviewing the alleged victim, alleged perpetrator or possible witnesses) before this had been agreed with the LADO, who will liaise with the police and social care.
- 5.7 The DSL will seek advice from the LADO about how, when and by whom parents or carers should be informed unless there is an emergency situation, such as when a child/young person/vulnerable adult has been injured and needs medical attention.
- 5.8 Any investigation conducted by CN4C managers, after consultation with the LADO, will follow CN4C's procedures for investigations. Once the outcome is determined the relevant managers will take a view on how to proceed in line with its disciplinary policies.
- 5.9 Where a member of staff or a volunteer is dismissed from CN4C's employment or is the subject of an internal disciplinary linked to abusive conduct relating to a child/young person/ adult, CN4C will notify the Independent Safeguarding Authority (ISA), as appropriate for a decision regarding barring to be made by them.
- 5.10 Where it is subsequently found that an allegation was malicious or vexatious, CN4C may refer the matter to be dealt with in line with its disciplinary policies for staff and service users.
- 5.11 Where the allegation concerns the DSL another SL will be involved and the DSM will play no role.
- 5.12 Where the allegation concerns the CEO, the DSL will notify and involve the Chair of the Board of Governors.

6. Records of Safeguarding Disclosures or Referrals

The DSL/SL shall retain a copy of:

- The referral form (and report, where appropriate)

- Any notes, memoranda or other correspondence dealing with the matter
- Any other relevant material
- Notes and statements must always be signed and dated

6.2 Copies of reports etc. should be kept in line with LSCB Guidance, securely locked at all times and kept for a minimum period of seven years or until the alleged victim is 25 years old, whichever is the greater period of time.

6.3 Copies of reports regarding any safeguarding related allegations made against staff shall be kept securely for at least until the individual has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer. Where an individual has faced allegations of gross misconduct it is advisable to keep their HR record beyond their retirement age.

7. Confidentiality

7.1 All suspicions, allegations and investigations will be kept confidential and shared only with those who need to know.

7.2 Any note taker and/or witness to disclosure interviews must be agreed with the alleged victim and they should be encouraged, where appropriate, to have a friend or advocate present to support them.

7.3 Any discussions with an alleged victim must be carried out in a sensitive, supportive and empathetic manner, in a confidential and appropriate area, respecting their dignity and privacy.

7.4 Those under 18 years should be strongly encouraged to seek support from their parents/carers unless the allegations relate to their home or family situation. If the victim does not wish to involve their parent(s)/carer(s) this should be explicitly recorded in the notes taken.

Appendix B - CONTACTS

CN4C Key Internal Contacts

Safeguarding Leads	Location Responsibilities	Direct Dial Contacts
CEO Tarn Lamb	All sites	01209 310610 07837246205 tarn@cn4c.org.uk
Operation Director Designated Safeguarding Lead Emma Wooderson	All sites	01209 310 610 07971 184465 ewooderson@cn4c.org.uk
Strategy, Learning and Development Director Designated Safeguarding Lead Sarah Spargo	The Elms Children and Young People	01209 310 610 07761 097534 sspargo@cn4c.org.uk

Key External Contacts

Safeguarding referral arrangements differ depending on whether the concern relates to a child or young person, an adult with care and support needs, or an allegation about a person working with children or adults.

Where there is an immediate risk to life or someone is in immediate danger, call 999.

Children and Young People.

What is the Multi-Agency Support and Safeguarding Hub (MASSH).

The Multi-Agency Support and Safeguarding Hub (MASSH) is Cornwall's single point of access for safeguarding concerns, family help, advice and guidance relating to children and young people.

MASSH brings together professionals from children's social care, health, education and the police to respond to concerns and help children, young people and families access the right support. It incorporates the functions previously provided through the Multi-Agency Referral Unit (MARU) and Early Help Hub.

Practitioners should refer to the Cornwall and Isles of Scilly Multi-Agency Continuum of Needs when considering the level of need, risk and appropriate response for a child or family.

Advice and guidance for practitioners.

Where a practitioner is unsure about the appropriate level of support or whether a referral should be made, advice and guidance can be obtained from MASSH.

Where appropriate, CN4C staff should discuss safeguarding concerns with their line manager and/or a Safeguarding Lead. However, seeking internal advice must not delay action where there is a concern that a child or young person may be at risk of harm.

MASSH can provide advice about the appropriate response and whether a referral should be made or other support should be considered.

Making a referral.

If there are concerns about a child's welfare, or there is reason to believe that a child may be experiencing or at risk of abuse, neglect or other harm, a referral should be made to MASSH.

Written referrals should be made using Cornwall Council's online referral form.

Where there is uncertainty about whether a referral should be made, practitioners can seek advice from MASSH. However, concerns about immediate or significant risk should not be delayed while seeking internal advice or gathering further information.

Contact details.

Multi-Agency Support and Safeguarding Hub (MASSH)

Telephone: 0300 123 1116

Email: massh@cornwall.gov.uk

Online referrals and further information are available through the Cornwall Council website.

Out of Hours Social Work Service: 01208 251 300

The Out of Hours Service is available:

- weekdays from 5.15pm (4.45pm on Fridays) until 8.45am;
- weekends from 4.45pm on Friday until 8.45am on Monday; and
- all public holidays.

The Out of Hours Service is for urgent concerns. It does not deal with routine requests.

If there is an immediate risk to the safety of a child or young person, call 999.

Adult Safeguarding.

Concerns that an adult with care and support needs is experiencing, or is at risk of, abuse or neglect should be referred through Cornwall Council's Adult Safeguarding process.

Making an adult safeguarding referral.

Practitioners should make a safeguarding referral using Cornwall Council's online safeguarding referral form.

If you are a practitioner and need advice about an adult safeguarding concern, you can contact the Adult Safeguarding Team on:

Practitioner advice: 01872 326433

To report concerns about an adult experiencing abuse or neglect by telephone, contact Adult Social Care on:

Adult Social Care: 0300 1234 131

Out of hours emergencies: 0300 1234 131, option 1

If someone is injured or in immediate danger, call 999.

If you think a crime is being committed and there is no immediate danger, contact the police on 101.

Allegations about people who work with children – Local Authority Designated Officer (LADO).

The Local Authority Designated Officer (LADO) oversees allegations and concerns about people who work or volunteer with children and young people.

The LADO should be contacted where there is a concern that a person working with children may have:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against, or related to, a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

LADO contact details.

Telephone: 01872 326536

Email: lado@cornwall.gov.uk

Professional allegation referrals should be made using Cornwall Council's online LADO referral form.

Allegations about people who work with adults – Person in a Position of Trust (PiPoT).

A Person in a Position of Trust (PiPoT) referral should be made where there is a concern about a person who works with adults with care and support needs and who may have:

- behaved in a way that has harmed, or may have harmed, an adult or child;
- possibly committed a criminal offence against, or related to, an adult or child; or
- behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs.

PiPoT referrals should be made using Cornwall Council's online PiPoT referral form.

If you are a practitioner and are unsure whether a PiPoT referral should be made or need advice about a concern, contact the Adult Safeguarding Team on:

Practitioner advice: 01872 326433

Ofsted – Whistleblowing.

Ofsted can be contacted where there are concerns about safeguarding practices, standards or regulatory requirements relating to children and young people within an education setting that Ofsted inspects or regulates.

This may include concerns about:

- wider or systemic failures in safeguarding practice;
- a setting failing to meet regulatory requirements;
- concerns that have been raised with the setting but have not been adequately addressed; or
- concerns which a person does not feel able to raise directly with the setting.

Ofsted does not investigate individual child protection concerns. Where there is a concern that a child or young person is experiencing, or is at risk of, abuse or neglect, this should be referred through the appropriate safeguarding route, including MASSH or the police where appropriate.

Staff should follow CN4C's Safeguarding and Whistleblowing Policies when raising concerns about safeguarding practice within CN4C.

Ofsted Whistleblowing Hotline.

Telephone: 0300 123 3155

Monday to Friday, 9am to 5pm

Email: whistleblowing@ofsted.gov.uk

Post:

WBHL, Ofsted
Piccadilly Gate
Store Street
Manchester
M1 2WD

NSPCC Whistleblowing Advice Line.

The NSPCC Whistleblowing Advice Line provides support and advice to professionals who have concerns about how their organisation is working with children or how child protection issues are being handled.

The service can be contacted where a member of staff:

- has concerns about safeguarding or child protection practice within their organisation;
- believes that concerns they have raised have not been dealt with appropriately;
- does not feel able to raise their concerns within their organisation; or
- is unsure about whether or how to raise a child protection concern about their organisation.

Concerns can be raised anonymously.

NSPCC Whistleblowing Advice Line.

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

Appendix C – Forms of Abuse

Previous Government Guidance has identified a number of categories of abuse which are detailed below. More recent areas of particular concern appropriate to our age group include:

- Radicalisation of vulnerable individuals, often via internet chat rooms
- Child Trafficking
- Child/Vulnerable Adult Exploitation
- Sexting/inappropriate use of social media/on-line bullying
- Emotional abuse associated with being a victim of or witnessing domestic abuse
- Controlling relationships/abuse
- Neglect or self-neglect or self – harm
- Female Genital Mutilation
- Hate crime/incidents
- Online Safety

Safeguarding Leads have undertaken various training on the above and can provide support, together with contacts in specialist support agencies.

These types of abuse can relate to either a child/young person under the age 19 years or to an adult who is vulnerable under the Care Act definition

Physical Abuse

This may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, pushing, kicking, rough handling or unnecessary physical force either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions or other physical harm.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child / young person.

Emotional/Psychological Abuse

This is the persistent emotional ill-treatment of a vulnerable person such as to cause severe and persistent effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectation being imposed on them. These may include interactions which are beyond their capability/capacity as well as overprotection and limitation of exploration and learning or preventing the individual from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve bullying, coercion, harassment, verbal abuse, deprivation of contact, isolation, humiliation or withdrawal from services or supportive networks. These actions may cause vulnerable people to feel frightened or in danger and can include the exploitation or corruption of children/young people or adults who are vulnerable.

Sexual Abuse

This involves forcing or enticing a child/young person or adult who is vulnerable to take part in sexual activities, including prostitution whether or not the child/young person/adult is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape) or non-penetrative acts. They may include non-contact activities, such as involving

children/young people/adults in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging them to behave in sexually inappropriate ways.

In terms of an adult, this includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting. Sexual abuse can occur between people of the same sex, and it can also occur within a marriage or any long-term relationship.

A relationship of trust and a duty of care should exist between a member of staff or a volunteer and the person for whom they are teaching or caring for, it would be seen as a betrayal of trust, and therefore abusive, for that member of staff or volunteer to have a sexual relationship with the person they are teaching or caring for.

Neglect

This is the persistent failure to meet the child/young person/ adult (who is vulnerable) basic physical and/or psychological needs, likely to result in the serious impairment of the individual'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 and clothing, shelter including exclusion from home or abandonment, failure to protect a child/young person from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate caretakers or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child/young person's basic emotional needs.

With an adult this also includes ignoring or withholding 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, clothing and heating.

Self-Neglect/Harm

This is not a direct form of abuse, but staff need to be aware of it in the general context of risk assessment/risk management and to remember that they may owe a duty of care to a child/young person or vulnerable adult who places her/himself at risk in this way. A refusal to engage with services does not override a duty of care to support individuals and they should continue to be encouraged to access support.

Female Genital Mutilation (FGM)

This is an unacceptable and illegal (in the UK) form of abuse and violence towards girls and women involving female circumcision. FGM is practiced in at least 28 African countries and some in the Middle East and Asia. Research in the UK has identified three key communities in which FGM is more prevalent: Somalis, Kenyans and Nigerians. The practice is normally carried out girls between infancy and 15 years. Sometimes girls are taken abroad to have this carried out and return to the UK traumatised and in need of medical support or counselling. There have been incidences of FGM in the South West including Devon and Cornwall despite the fact that there are few people from these communities living in this area.

Forced Marriage

In some communities, such as those above marriages are arranged by family members for very young females, often to older men who the females have not even met. This is illegal in the UK,

so young people can sometimes be taken back to the country of their ethnic roots on the pretext of a “family holiday” to be married, often despite their resistance. Duress including emotional pressure and/or physical abuse can be a factor in this and again young people to whom this happens will often need emotional support or help from statutory agencies to resist being taken out of the country.

Domestic Abuse/Teenage Relationship Abuse

Abuse can be either in the form of being personally abused within a relationship or for a child or young person to witness this within their home, perhaps involving parents/carers. Witnessing domestic abuse has been proved to have an effect on the emotional development and well-being of a child or young person. This can be addressed by support through professional counselling.

Financial or Material Abuse

This includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

Discriminatory Abuse

This includes racist, sexist, or other forms of abuse that are based on a person’s protected characteristics and other forms of harassment, or similar treatment. This can be viewed by a victim as hate crime and the Police can prosecute on this basis.

“Revenge Porn”

New legislation came into force in April 2015 to prevent sexually explicit photographs or videos being shared or posted so as to cause harm or distress to the person subject of the material. The new law includes uploading to the internet, sending by text, email or messaging platforms, as well as simply showing someone a physical or electronic image. The penalty upon conviction is up to two years imprisonment and/or a fine and a criminal record.

Radicalisation

This is a process by which a person comes to support terrorism and/or forms of extremism leading to them committing acts of violence or the support of violence by others in a group. Young people and adults who may be vulnerable are often targeted by groups such as so called ISIL/ Islamic State or the English Defence League (EDL) or Animal Rights activists who may promote violent extremist activity. They may be drawn into association with these groups through internet chat rooms, possibly motivated by a wish to belong or to make a stand or a difference. Staff and service users should be made aware of the signs of radicalisation and raise any concerns with Safeguarding Leads who are trained in how to identify and report potential victims.

Online Safety

Online harm now explicitly includes exposure to disinformation, misinformation, and conspiracy theories, as well as risks arising from generating AI, such as AI-generated sexual or extremist content. Safeguarding Leads should ensure staff receive training on these emerging needs.

Appendix D – Signs of Potential Abuse

Signs of abuse can be many and varied but can also be innocent indications of a transition to adult life. However, they should always be considered as potential causes for concern and followed up/monitored in a sensitive way, with appropriate records dated and kept securely. Safeguarding Leads, Senior Learning Advisers and Participant Liaison Officers are trained and experienced in exploring such issues in a confidential and supportive way and can assist colleagues in this or provide guidance and support. They can also seek external, specialist advice and/or make referrals to statutory agencies.

Possible indicators of abuse

- Physical injuries, including bruises, particularly if reasons for these do not appear plausible or if injuries are repeated or self-harm is suspected
- Emotional distress, fear, unwillingness to go home
- Expressed fear of particular individuals: family members, fellow service users, neighbours, boy/girlfriend
- Sudden changes in behaviour, e.g., becoming very withdrawn or aggressive
- Changes in attendance patterns at CN4C
- Significant loss/increase of weight or poor hygiene or appearance
- Hungry at CN4C with no money to buy food or borrowing money to buy food
- Poorly dressed or equipped for CN4C
- Sudden changes of living circumstances, e.g., moving out of home to live elsewhere
- Sudden acquisition of jewellery, gifts from older girl/boyfriends
- Expression of radicalised views to others – racism, extreme political views, animal rights, religious ideology etc.
- Expression of Interest in weapons, explosives etc.
- Talking about travelling abroad to conflict zones such as Syria



Appendix E

CORNWALL AND ISLES OF SCILLY SAFEGUARDING CHILDREN BOARD (SCB)

Overview of the SCB

Key objectives: Key Priorities 2015/16: Scrutiny Function:

Key objectives

Section 14 of the Children Act 2004 sets out the objectives of LSCBs, which are:

- (a) to co-ordinate what is done by each person or body represented on the Board for the purposes of safeguarding and promoting the welfare of children in the area; and
- (b) to ensure the effectiveness of what is done by each such person or body for those purposes.

Key Priorities for 2015/16

- ❖ Multi-agency response to child sexual exploitation
- ❖ Multi-agency emphasis on understanding and hearing the 'voice of the child'
- ❖ Multi-agency response to neglected children
- ❖ Multi-agency response to children with emotional / mental health difficulties
- ❖ Multi-agency response to the risk of radicalisation

Scrutiny Function

There are a number of mechanisms that support the SCB to scrutinize the effectiveness of partner agencies. These include:

- ❖ An Independent SCB Chair
- ❖ SCB and subgroups, including a Quality Assurance and Scrutiny sub group which 'calls in' partner agencies to assess single agency audits and performance against Key Quality Assurance questions
- ❖ An 'intelligence led' Section 11 procedure that reflects key SCB priorities
- ❖ A robust Safeguarding Standards Unit (SSU)
- ❖ Multi agency case file audits
- ❖ SSU independent chairs for all Child Protection Conferences

Appendix F - FGM (Female Genital Mutilation) Guidance and Reporting requirements

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf



Home Office

Mandatory Reporting of Female Genital Mutilation – procedural information

Appendix G

PREVENT STRATEGY/ACTION PLAN

1. Context:

The Counter-Terrorism and Security Act 2019 came into force in 2019. The strategy CONTEST has four elements Pursue, Protect, Prepare and Prevent. The Prevent strand places a range of statutory duties on education providers, including colleges.

The Prevent Duty Guidance (1st April 2021) follows on from the Prevent Strategy published by the Government in 2011. This strategy had three specific objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- work with sectors and institutions where there are risks of radicalisation that we need to address.

The Prevent Duty Guidance (2015) requires effective leadership where the following is developed and acted on:

- establish or use existing mechanisms for understanding the risk of radicalisation;
- ensure staff understand the risk and build the capabilities to deal with it;
- communicate and promote the importance of the duty; and
- ensure staff implement the duty effectively.

Assessing the risk is going to be paramount. Organisations will need to:

- Carry out risk assessments to determine how service users / staff may be at risk of being drawn into terrorism and action plan based on this risk assessment
- Ensure that CN4C has a clear process for referring concerns to statutory organisations including specialist Police departments.
- Train leaders / Governors, Board members, staff and service users
- Exemplify British Values
- Ensure that staff understand what may draw a participant in to terrorism/radicalisation.

This is now an important aspect of an organisation's safeguarding policy and practice and therefore will be regulated by Ofsted and other regulatory bodies.

“Further Education provides service users with skills they will draw on for the rest of their lives. Since many people pass through Further Education at some point it is absolutely critical that institutions embody these values of openness, free debate and tolerance, and promote them through the way they operate”.

(David Lammy, Minister of State for Higher Education and Intellectual Property - The Role of Further Education colleges in Preventing Violent Extremism: Next Steps”).

2. The aim of CN4C Prevent Strategy is to:

- Develop an awareness of the Prevent agenda across CN4C's sites, staff and service users
- Develop a coordinated action plan to train Safeguarding Leads, other staff and service users
- Ensure that CN4C links into key local and national forums to develop and share good practice and intelligence
- Recognise current practice which contribute to the Prevent agenda
- Identify areas for improvement to meet statutory requirements and recognised good practice
- Ensure that staff and service users know how to report concerns related to Prevent

Note: while the main focus of Prevent is on potential Al Qaeda/ISIL-related terrorism, the approach is also used in respect of far right (e.g., EDL) and animal rights extremist activity.

3. Promotion of British values.

Education, like other key sectors, has a responsibility to promote values of openness, tolerance and facilitating free debate which is central to being a British citizen. This will be addressed through:

- Staff and participant awareness raising/training
- Sessions delivered through Personal and Professional Development for study programme service users
- Participant Code of Conduct and Disciplinary Procedure
- Events and campaigns
- Internal publicity such as Participant PDPs and Induction Records, and the work of Safeguarding Leads
- Parent/Carer information promoted through our website

With the current government alert at severe CN4C needs to be aware of risks and raise awareness within its community.

4. Local Partnerships

- CN4C has some well-established partnerships in place but further development to strengthen these partnerships is required to ensure the safeguarding of our CN4C community across our sites.
- CN4C has working partnerships with the local police
- CN4C works closely with a range of external agencies, including employers, work based and training providers.
- CN4C, led by our Safeguarding Leads team will continue to establish closer working links with communities which will enable the CN4C to understand local issues
- CN4C has good links with many of its local schools. This work is important to help understand tensions within our youth communities and support transition arrangements for some of the most vulnerable service users.

5. Prevent within overall Safeguarding Policy and Procedures

CN4C has been working on a range of initiatives which sit within the Prevent agenda. Prevent sits within Safeguarding within CN4C. The Safeguarding Leads team meet regularly, and Safeguarding concerns are discussed and actions minuted. This includes references to Prevent. Safeguarding Policy and procedures are well established and generally understood by

staff. Staff are required to attend Safeguarding face to face training and/or update via online packages at least annually.

Whilst Prevent sits within the CN4C Safeguarding Policy and Procedures other policies contribute to the agenda:

- Equality & Diversity
- Safeguarding Policy
- Bullying and Harassment Policy
- Social Media Policy
- Safer recruitment
- Prevent awareness embedded in Tutorial/PPD Programme/Scheme of Work
- Participant Engagement Strategy
- Parent Involvement Strategy

6. Staff

Currently knowledge and understanding of PREVENT agenda by staff is mixed across the organisation. However, staff are clear that it is every staff member's responsibility to respond appropriately to service users whose behaviours are challenging and inappropriate. It is recognised that some staff require support and encouragement to develop and use the skills required to challenge appropriately and general classroom management, together with the PREVENT contextual knowledge learned through online PREVENT training.

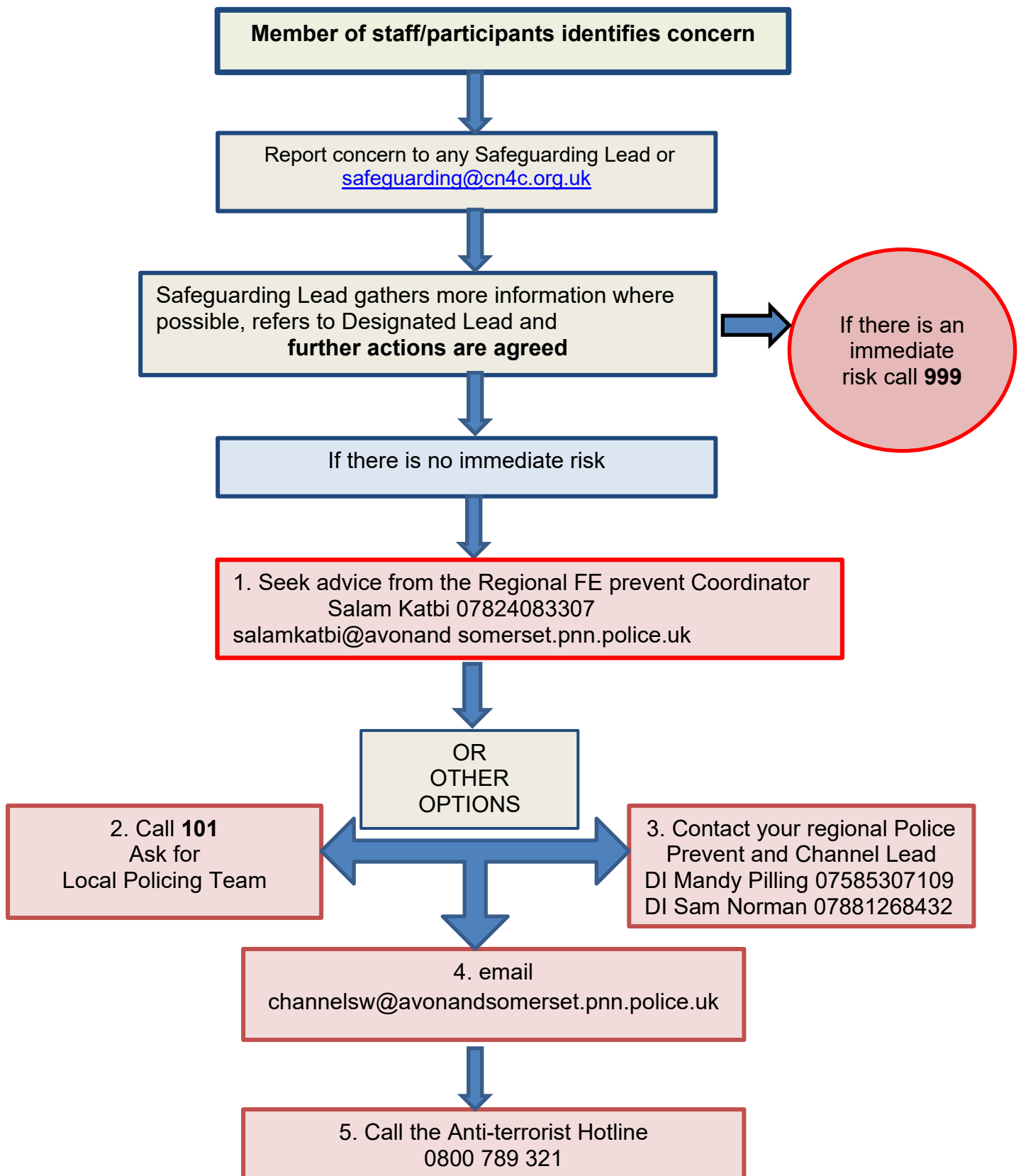
7. Participant Voice

Participants are able to report safeguarding concerns anonymously via our safeguarding@cn4c.org.uk email address. During induction, participants are made aware of this and again through the tutorial PDP programme and campaigns/events.

PREVENT and *Channel Reporting

It is important for staff/participants to know where to go with any concerns that someone may be on the route to or at risk of radicalisation. *Channel is the process used by statutory agencies to assess, support and monitor those showing signs of radicalisation.

Below is a flow chart which shows the process which you should follow to raise any concerns:



Appendix H - External Speakers Policy

1. Introduction

CN4C welcomes events and opportunities for individuals or organisations to speak to service users and staff. However, we also have to balance this with considerations of the safety and well-being of our service users, staff and site users, while also ensuring that we are compliant with relevant legislation, including the 2015 Counter Terrorism and Security legislation.

It is our responsibility to make sure that everyone attending an event based on one of our sites feels safe. This Policy provides the framework, guidance, advice and also reminders on the law in place to protect staff, service users, visitors and the reputation of CN4C.

In the context of this Policy, External Speakers are defined as anyone, an individual or organisation wishing to use a CN4C site for events, and individuals or organisations wishing to hire or use the any CN4C sites or buildings **beyond normal activity-related speakers such as local employers or industry experts.**

(If unclear as to whether this policy applies to planned events or speakers, staff are expected to check with the senior management of CN4C to ensure compliance where required).

2. Freedom of Expression

Freedom of expression and speech are basic human rights that are protected by British law. Service user safety and welfare are at the heart of CN4C's policies and practices. The freedom to express views need to be balanced with the need to secure freedom from harm for service users, staff and local communities. CN4C expects all activities to be safe, without risk to the reputation of CN4C and within the law. In allowing speakers to attend events or CN4C buildings to be used for events they will be approved based on the understanding that they act within the law and regulations set by the CN4C.

Staff and service users of CN4C and all other persons attending meetings held on the premises must behave in a lawful manner and avoid taking any action or using any language which is offensive or provocative. Our objective to promote freedom of speech is limited by legislation which protects individuals and groups of individuals from abuse. This includes communication which is hateful, threatening, illegal, abusive or insulting and is intended to harass, alarm or distress.

Communication which targets a person based on their Protected Characteristics including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation is forbidden on CN4C sites. All speakers, as well as event attendees, must be respectful of the beliefs and opinions of others. CN4C also reserves the right to refuse an external or internal event or speaker where it is felt the content is inappropriate for CN4C's service users under 18 or that a connection with it would impact on CN4C's reputation as a CN4C providing education/training for 16- 18-year-old service users.

3. Assessing and Managing Risk

Risks around events will be considered and where they include but are not limited to; reputational damage; security of premises; safety of persons attending or in the vicinity; interruption of the work of service users and staff not directly involved; welfare of service users and staff and the ability to ensure good conduct of speakers and participants.

With regards to the need to manage and mitigate risks to protect CN4C staff and service users there may be occasions where conditions are attached to the approval of external speakers. These conditions may include:

- Requesting submission of speeches, presentations, discussion topics or questions in advance of the meeting.
- Limitation on attendees, either by number or participant status.
- Limitations on promotion and advertising of the event by requirement for approval of any advertising material, restriction of where material can be placed, or limitation of what types of material can be used.
- Declaration of attendees in advance of the meeting.
- Stewards to be provided by the organization running the event.
- Presence of CN4C staff to ensure good order.
- Limitation on what attendees may bring to the event.
- Not allowing banners, flags or place cards or similar items into the building or onto relevant parts of the site.
- Closing down of the event if there is reasonable need, even if the event is already underway.
- Limiting the presence of press/media or media production equipment.
- Liaison with Police and other statutory agencies to seek specialist advice

An event may also be cancelled if there are reasonable concerns that the event may risk safety, violation of health & safety requirements or if the event risks violating legislation regards hatred, discrimination or incitement.

Organisers are also not permitted to raise or gather funds without express permission in advance from the CN4C's management team.

4. Procedure

CN4C staff members must notify the CN4C building manager of any "in scope" events that involve external speakers. No event involving any external speakers may be publicised or considered confirmed until the speaker has been cleared through the procedure detailed in the Policy below.

CN4C reserves the right to cancel, prohibit or delay any event with an external speaker if the Policy has not been followed.

If there is cause for concern, details should be shared with a Senior Postholder for further investigation and guidance. Reasons for a referral include any of the following:

- Any person or group on/or linked to the UK Government list of proscribed terrorist organisations.
- A speaker tour.
- Talks or representatives by organisations generally considered to be "extremist".
- A speaker who is known to have spoken previously at another institution on a topic that has caused fear or intimidation of service users or staff.
- A speaker accepted in mainstream as being highly controversial;
- A speaker known to/or likely to cause harm to a specific group of service users.
- A link/or links to any person or group that has been connected with any

controversy of a negative or positive nature.

- A speaker who has significant profile and attracts a following that could create crowd control and health & safety issues.
- A speaker from a political party during an election period.

5. Speaker Validation

In most cases the CN4C CEO will ratify a speaker but in cases where a referral is needed the following will apply.

The relevant Senior Postholder will conduct a short investigation into the speaker and the event. They may take one of the following decisions:

- To not permit the event with the external speaker to go ahead.
- To fully permit the event with the external speaker to go ahead unrestricted.
- To permit the event with the external speaker to go ahead on the basis of regulatory steps designed to reduce any risks. This decision will be communicated in writing to the event organiser and CN4C reserves the right to terminate the event with no notice if the decision is not adhered to.

6. Review of Policy

This Policy has been prepared to protect CN4C, its staff and service users but it is not intended to restrict the freedom **within the law** to question and test, put forward new ideas, controversial or unpopular opinions.

Any queries with regards to the contents of this Policy should be raised with a member of the Senior Leadership Team.

The Policy will be regularly considered with regards to changes in legislation and updated following a review in July 2017.

Equality Impact Assessment Tool

Name of Policy: **External Speakers Policy**

		Yes/No	Comments
1	Does the policy/guidance affect one group less or more favorably than another on the basis of:		
	Race or ethnicity	N	
	Disability	N	
	Gender	N	
	Religion or belief	N	
	Sexual orientation	N	
	Age	N	
	Marriage and Civil Partnership	N	
	Maternity and Pregnancy	N	
	Gender Reassignment	N	

2	Is there any evidence that some groups are affected differently?	Y	Depending on the requests. Some groups may feel they are being treated differently and therefore it will be important to show how decisions are reached and to be consistent in the application of
3	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	Y	The CN4C has a Duty of Care to protect service users and staff and its reputation.
4	Is the impact of the policy/guidance likely to be negative?	N	
5	If so, can the impact be avoided?		
6	What alternatives are there to achieving the policy/guidance without the impact?	N	No viable alternatives as need an appropriate Policy in place to manage risks.
7	Can we reduce the impact by taking different action?	N	

APPENDIX I – Supplementary Guide for Residential/Outdoor Learning Settings

- When young people/vulnerable adults are changing and showering staff need to ensure that they do not allow themselves to be compromised
- If a young person or vulnerable adult requires assistance with personal care, this should always be observed by another member of staff and the individual should be encouraged to do as much of this as possible independently
- Staff must always ask for permission to enter the bedroom of a young person or vulnerable adult and must ensure that they do not enter a bedroom or private space if this means they will be alone with a young person or vulnerable adult
- Conversations should be conducted from the open doorway
- Many outdoor learning activities encourage and necessitate physical contact. Staff need to be aware of anyone taking advantage of these activities or anyone being overtly uncomfortable with what they are being asked to participate in
- Staff must be aware of not compromising themselves when assisting service users with activities such as adjustments to specialist equipment or clothing
- In residential or outdoor learning settings the atmosphere is often more relaxed and informal and staff must be aware themselves and ensure that service users are also aware of their professional boundaries
- These settings can create an atmosphere of trust where an individual feels comfortable to make a safeguarding disclosure. Staff must be alert to this and follow our Policy and Procedures whether on a CN4C site or elsewhere

Participant Residential Visits – Safeguarding Requirements.

It is the responsibility of the CN4C Leader to ensure that staff participating in the trip/visit have read and fully understood the 'Staff Professional Code of Conduct', Safeguarding Policy and Procedures. The CN4C Leader must ensure that staff or other adults accompanying CN4C are appropriately informed about their responsibilities prior to the trip leaving CN4C and supported in carrying these out while the trip is underway. All staff accompanying trips must ensure that as well as safeguarding service users involved on the trip, they safeguard themselves against any allegations of inappropriate behaviour or lack of "duty of care" for service users. All adults leading or accompanying service users on trips are expected to demonstrate best practice in line with this Guidance, the Staff Code of Conduct and Off Site Activities and Educational Visits Guidance.

Staff Professional Code of Conduct

Staff involved in trips and off-site educational visits should meet the same high standards of behaviour which are expected on-site. Staff accompanying trips, whether they are 'on duty' or 'off duty', must realise that they have additional responsibilities and must not engage in any behaviour likely to endanger themselves or the service users or to bring CN4C into disrepute. It is expected that staff maintain professional boundaries and make professional judgements, with participant safety and welfare in mind at all times. All service users have the right to be in a safe and caring environment

Off-Site Participant Activities and Educational Visits

SAFEGUARDING CONSIDERATIONS

1. Safeguarding concerns and arrangements must extend to all CN4C activities regardless of where the activity takes place. Visit leaders must ensure wherever possible that the gender mix of staff reflects that of the participant group and take into account the needs of any

vulnerable service users. This is a necessary consideration in the event of a participant having personal difficulties and where close supervision may be necessary. It is a compulsory requirement during residential visits.

- An individual support plan/risk assessment should be completed with any vulnerable participant indicating the level of support and supervision required. Parents/carers of service users under 18 should be invited to contribute to this.
 - Good Practice: a meeting should be held with staff and service users prior to a residential visit to give information and address any concerns. Parents/carers of Under 19s should be invited to the meeting
 - Good practice: A guide to the trip, including responses to 'Frequently Asked Questions' should be produced in advance of the trip and shared with service users and parents/carers of under 19s.
2. Visit leaders and supervising staff will need to be aware and take account of any participant with particular behavioural, health or medical concerns during the visit.
 - An individual support plans/risk assessment should be completed with any participant with a behavioural, health or medical concern, indicating the level of support and supervision required. Parents/carers of Under 18s should be invited to contribute to this.
 3. Only persons who have been subject to the appropriate DBS checks are permitted to have 1:1 or close contact with service users during visits. Non CN4C employees (e.g. staff employed at an activity centre) are not permitted to have unsupervised 1:1 contact with service users less than 19 years of age or adult service users who may be vulnerable, unless they have been subject to the relevant DBS checks.
 - Arrangements for the supervision of service users must be agreed in advance. There must be members of staff 'on duty' at all times. It must be clear to service users which member of staff is on duty and how to contact them. Staff should use CN4C mobile phones (not personal mobile phones) to keep in contact with service users.
 - A staff duty timetable for the duration of the trip should be produced and shared with the service users.
 - Clear guidance should be given to service users when they have 'free time'. A meeting point and return time should be agreed and service users should be given a staff contact number. Service users who are under 19 years old should stay in pairs/groups at all times.
 4. CN4C employees are not permitted to transport service users under 19s or adult service users who may be vulnerable in a vehicle without an accompanying member of staff, unless in an emergency.
 5. Service users must be informed of standards of behaviour with regard to alcohol, smoking and personal contact, particularly during residential visits. This should be communicated through a written code of conduct issued to service users and signed and reasonable measures taken to enforce it.
 - Parents of under 18s should be given a copy of the signed Code of Conduct
 - Clear guidance must be given re alcohol and smoking. In particular, over 18s must not purchase or supply alcohol or tobacco to under 19s. Under no circumstances should staff 'on duty' consume any alcohol.

- The existing Participant Code of Conduct can be adapted for trips and residential visits
 - Examples of Residential trip Codes of Conduct: Level 2 Diploma in Agriculture (mixed under and over 18s) and Tournament Golf CN4C (over 18s)
6. Visit leaders must consider any additional risks and apply any necessary precautions during residential visits, where a participant group comprises adults (defined as persons aged 18 or over) and young persons (defined as persons aged under 18). Factors to consider include sleeping arrangements, bullying and harassment, peer pressure and potential negative influences, particularly on younger, more easily influenced service users.
- Service users (over 18s and under 19s) should be reminded that they are on a CN4C trip, and as such there are expectations of them, specified in the code of conduct.
 - Staff should check that service users have signed a 'model release' permission form to allow photographs to be used in CN4C publications and on CN4C social networks.
 - Staff should never:
 - ignore or subvert agreed guidelines and codes of practice
 - use personal social networking sites/personal mobile phones to communicate with service users. Personal social network sites must be fully 'locked down'.
 - engage in sexually provocative behaviour or rough physical games.
 - use inappropriate language (e.g. swearing, racist, sexist or homophobic comments).
 - allow service users to use inappropriate language unchallenged (e.g. racist, sexist or homophobic comments).
 - make sexually suggestive comments in front of, about or to a participant.
 - ignore service users who express concerns or make allegations or disclosures.
 - engage in 'banter' which could be misinterpreted.
 - show undue favouritism to certain service users.
 - have unnecessary physical contact with service users.
 - meet with service users outside organised activities or spend time alone with service users, especially away from others.
 - allow bullying or discrimination to take place unchallenged.
 - take any actions likely to put others at risk or beyond their capability.
7. Visit leaders should consult with CN4C Safeguarding Leads should they require further guidance or have any concerns regarding safeguarding arrangements either prior to the trip or as soon as any concerns come to light. The emergency contact for Safeguarding Concerns related to trips is Sue Jones, Designated Safeguarding Lead, 0172 226406.

Group Leader Name:

I confirm that I have read and will comply with this Guidance and the associated documents referenced within it

Signature:----- Date:-----

Group Member Accompanying:

I confirm that I have read and will comply with this Guidance and the associated documents referenced within it

Signature:----- Date:-----

Group Member Accompanying:

I confirm that I have read and will comply with this Guidance and the associated documents referenced within it

Signature:----- Date:-----

Group Member Accompanying:

I confirm that I have read and will comply with this Guidance and the associated documents referenced within it

Signature:----- Date:-----

APPENDIX J – External Agencies Procedures

Police Single Safeguarding Process

Implementation of the Devon and Cornwall Police Single Safeguarding Process

Introduction

This paper updates the progress towards the forcewide implementation of the Devon and Cornwall Police Single Safeguarding Process (SSP). This process was proposed by the Force's Safeguarding Vulnerable People Review which reported in 2013 following extensive partnership consultation. The process was subject to a pilot in Torbay which commenced in May 2014 and is now being implemented across the Force. The implementation is led by Detective Superintendent Steve Parker as part of the Investigation Management Model Project.

Salient Points

The Single Safeguarding process seeks to provide a coherent and consistent process for operation Police Officers and Staff that feeds into local multi-agency processes. The process depends on the implementation of a new Vulnerability Screening Tool (ViST) that works across different aspects of vulnerability.

The ViST is then assessed by a new Central Safeguarding Team (CST) that feeds into local processes. The CST represents a significant realignment of resources to safeguarding and provides a much more effective and consistent service than the current Central referral Unit. The planned timelines for implementation see ViST being implemented in Cornwall in October, Plymouth in November and Devon in December.

Central Safeguarding Team

The Central Safeguarding Team will be based in Exeter, Launceston and Torquay within existing buildings within the Force estate. The only site requiring significant development is Launceston. Engagement has been ongoing with Buildings and Estates and plans have been developed for the new offices with a timeline for building works to be completed by 9 October 2015.

The team consists of Police Officers and Staff. Interviews have been completed and successful candidates identified with training commencing on 5 October 2015. The current CRU external number will be retained and marketing material is being prepared for partner agencies to communicate the new contact details and working practices.

ViST

The new Vulnerability Screening Tool has been developed following the successful pilot in Torbay. A new ViST training package, focusing on the identification of vulnerability has been developed and is being delivered across the Force to all operation officers and staff. Forcewide communications and marketing are being developed and will be included as part of the launch of the SSP.

Partnership

Work is ongoing to try and standardise the Police process as far as possible while allowing local flexibility to feed into local partnership arrangements. External marketing material is also being prepared to assist in launching the new process to partner agencies. Local partnership groups have been formed and work is ongoing to ensure the CST feeds into local processes and meets the needs of partners.

Work continues together with partner agencies to implement the process over the next three months. It is anticipated that the changes will commence from October 2015 starting in Cornwall and the Isles of Scilly followed by Plymouth and then Devon.

D/Supt Northcott.

Head of PPU

29/09/15

Domestic Abuse Procedure

1. TITLE

Domestic Abuse Procedure

2. POLICY STATEMENT

The Domestic Abuse Policy of CN4C seeks to raise awareness of domestic abuse and develop a workplace culture where domestic abuse is recognised as being unacceptable. CN4C does not tolerate any form of domestic abuse irrespective of whether the activity takes place in the workplace or outside the workplace. CN4C encourages any employee/participant who is experiencing domestic abuse to tell us so that appropriate help and support can be offered. The policy sets out how CN4C will recognise, respond, support and refer issues of domestic abuse and what action to take in the following circumstances:

- The victim* or witness is an employee or participant of CN4C
- The perpetrator is an employee or participant of The Cornwall CN4C Group
- Both victim and perpetrator are employees or service users of CN4C

* CN4C recognises that survivors of domestic abuse may not identify with the term “victim” and prefer the word “person who endures” but for the purposes of consistency with other agencies, referral processes and associated paperwork, the word victim will be used.

3. CONTEXT

A detailed infrastructure has been put in place to support employee and participant disclosures. A group of CN4C employees have been trained in the Domestic Abuse, Stalking and Harassment and “Honour” Based Violence Assessment training programme (DASH training). A disclosure pathway has been set up to ensure that disclosures are referred to the appropriate agencies to maximise employee safety planning.

4. SCOPE

This policy is relevant to all members of CN4C community including staff and service users.

5. OBJECTIVE

- Fulfil our duty of care under health and safety legislation to provide a safe working environment where potential risks to health safety and wellbeing are identified and reduced
- Reduce the numbers of employees and service users enduring domestic abuse by encouraging disclosure
- Reduce employee and participant absences for those who are affected by domestic abuse
- Improve the safety of children, young people and adults who may also be affected by employee perpetrators by early signposting to relevant agencies
- Improve communication links with Police, Independent Domestic Abuse Advisory Service and the Multi Agency Referral Unit to ensure relevant information is shared according to information sharing protocol.

WHAT IS DOMESTIC ABUSE?

“Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality”. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, stalking, financial, emotional, so-called “honour” violence, female genital mutilation (FGM) and forced marriage.

Family members are defined as mother, father, son, daughter, brother, sister aunt, uncle and grandparents, whether directly or indirectly related, in-laws or step-family. This will include same sex relationships, heterosexual relationships, members of an extended family, and from children to parents. Domestic abuse relates to married, civil partnerships and cohabiting partners. Domestic abuse is also experienced by partners who have never lived together or co-habited with their abuser. It often continues after a relationship has ended.

SEXUAL ASSAULT

If an employee or participant discloses that they have been sexually assaulted please refer them to your Safeguarding Lead who will inform the Cornwall and Isles of Scilly Sexual Assault Referral Centre (SARC) also known as The Willow Centre which is based in Truro. In an emergency, please contact the Police direct by calling 999 and inform your Safeguarding Lead. The SARC can offer medical care and support while also offering the opportunity to assist any Police investigation (if the person chooses to report the crime). Sexual assault includes: rape, sexual assault, childhood sexual abuse, rape within marriage, female genital mutilation, trafficking, sexual exploitation and ritual sexual abuse.

CONFIDENTIALITY WHEN MAKING A DISCLOSURE

- The employee/participant’s personal circumstances will be treated as strictly confidential. The record of the disclosure will be securely stored in line with data protection principles.
- There may be a need to breach the confidentiality agreement if it is believed that the personal safety, wellbeing or welfare (or that of others) is at risk. The individual’s permission will usually be sought first of all, prior to any breach of confidentiality and disclosure to other authorities, but in some cases immediate contact will need to be made to prevent harm to others if it is believed that the individual or colleagues are at risk of serious injury or death or if it is believed that there is a substantial risk of harm to any children who are witnessing the violence or abuse.
- Professional guidance will be sought in specific cases, especially and relating to child protection and safety, and if the person’s life, or that of a child or co-worker or the public at large is in danger, then the police will be called.

- Ethical and statutory codes concerned with confidentiality and Data Protection are not intended to prevent the exchange of information between different professional staff who have a responsibility for ensuring the protection of adults and children.

6. ROLES & RESPONSIBILITIES

What to do if an employee discloses that they are a victim of domestic abuse.

- CN4C strongly encourages victims of domestic abuse to disclose the abuse in a confidential manner with a DASH assessor, Safeguarding Lead or anyone at work they feel comfortable disclosing to.
- CN4C cannot require a victim to take action if they do not want to but telling us will allow the individual to gain access to support and still be in control of how the situation is managed (barring any confidentiality exemptions).
- Irrespective of who takes the initial disclosure, all disclosures will be signposted to who can report it to the DASH assessor or Safeguarding Lead to ensure that the referral is made as quickly as possible and in the safest way possible. See Domestic Abuse Referral process below.
- CN4C will provide information, support and guidance to any individuals experiencing domestic abuse and will make reasonable adjustments at CN4C if the abuse is affecting their ability to perform or where their safety and welfare and that of their fellow employees is under threat.

What to do if an employee is a perpetrator of abuse

- If there is an allegation that one of the CN4C's employees is a perpetrator of domestic abuse, advice should be sought from HR. It may be necessary to suspend the employee pending a disciplinary investigation and to assess if there are any safeguarding concerns linked to the alleged perpetrator's employment role.
- Any individual who is alleged to have displayed abusive behaviour on CN4C grounds will be investigated under the CN4C's disciplinary and capability procedure. Breaches of this policy will lead to disciplinary action up to and including dismissal and may include the involvement of appropriate authorities. It is the CN4C's duty to report potential or actual criminal conduct to the Police.

If both victim and perpetrator are employees

- Contact HR and your Safeguarding Lead. It is essential that there is an assessment of all the facts and that a DASH risk assessment is undertaken before any action is taken, i.e., before speaking to the alleged perpetrator.
- Once the initial facts are known and a DASH Risk Assessment has been completed, the next steps will depend on the associated level of risk to the victim (standard, medium or high risk). Advice must be sought from the Risk Evaluation and Co-ordination Hub (REACH) before speaking to or suspending any individual in order that

relevant safety planning is in place for the alleged victim. The REACH number is 0300 7774777. Your DASH accreditor will lead on this investigation and contact all relevant agencies.

- If it is considered that there is a breach of the Employee Code of Conduct, Participant Code of Conduct or breach of the Domestic Abuse policy, it may be necessary to suspend the alleged perpetrator whilst a disciplinary investigation is completed.
- In cases where both the victim and the perpetrator of domestic abuse work/study in the same location, action may need to be taken to ensure that the victim and perpetrator do not come into contact on CN4C grounds.
- In all cases the safety of the alleged victim is paramount.

Domestic Abuse Referral Process:

1. If an individual or witness discloses: Listen carefully and sensitively to what the individual would like to do. Check if the individual wishes to proceed with having help and support from a trained individual/agency.
2. Your Safeguarding Lead will arrange for a Domestic Abuse, Stalking and Harassment (DASH) Risk Assessment to be undertaken, once consent has been given by the individual and the confidentiality agreement has been explained.
3. A DASH Risk Assessment is undertaken by one of the CN4C's trained Assessors.
4. The DASH Risk Assessment is uploaded onto the MODUS system and securely sent to the Risk Evaluation and Coordination Hub (REACH) in order that level of risk of serious harm is verified by a domestic abuse safety planning expert.
5. Where agreed with the individual, an Independent Domestic Violence Advisor (IDVA) will contact the employee using safe contact details. Once the referral has taken place, the Independent Domestic Violence Advisor (IDVA) is the primary point of contact for the victim. If there is a standard level of risk of serious harm, the individual will be referred to Victim Support.
6. If the manager is aware that their employee is enduring domestic abuse, they are advised to regularly check their welfare and review if any changes need to be made to safety arrangements or if any other reasonable adjustments need to be made.

7. SAFEGUARDING

If any reported behaviour gives rise to concerns that children, young people or adults may be at risk such information must also be referred to the relevant Cornwall Council central safeguarding referral unit by your Safeguarding Lead (0300 1231 116 for concerns about children, or 0300 1234 131 for concerns about vulnerable adults).

If there are any allegations or concerns relating to individuals in connection with children, young people or vulnerable adults – these will be dealt with under Cornwall CN4C's Safeguarding Policy. This may be in addition to any disciplinary action taken regarding offensive behaviour towards colleague

Mental Capacity Act Procedure

Introduction

Since 2005 the Mental Capacity Act has provided a statutory framework to empower and protect vulnerable people who may not be able to make their own decisions. The Act states that a person cannot make a decision if they cannot do any of the following four things:

- Understand information given to them relevant to the decision
- Retain that information long enough to be able to make the decision
- Use or weigh up the information available to make the decision as part of the decision-making process
- Communicate their decision

Lack of capacity can be due to (the list is not exhaustive)

- A stroke or brain injury
- A mental health problem
- Dementia
- A learning disability
- Confusion, drowsiness or unconsciousness because of an illness or the treatment of it
- A neurological disorder
- Substance misuse

If an individual has capacity then the 'substitute decision' provisions of the MCA do not apply (although having capacity does not preclude other legislative mechanisms, such as the Mental Health Act).

The five guiding principles of the CN4C's mental capacity policy are:

- Everyone is assumed to have capacity unless it is proved otherwise
- Staff must give all appropriate help before concluding that a participant cannot make their own decisions
- Staff must accept that people have the right to make what might be seen as eccentric or unwise decisions
- Any actions taken on behalf of a person who is deemed to lack capacity must always act in that person's best interests
- Any decisions taken should be the least restrictive of the person's basic rights and freedoms

1. Staff to conform to.

1.1. This policy is to ensure that staff at CN4C conform to the requirements of current legislation and directives which relate to service users mental capacity, liberty, human rights and the imposition of restrictions – Deprivation of Liberties Safeguards

1.2. Therefore, staff conformance to such legislation is important when dealing with service users in the areas of:-

- 1.2.1. Their mental capacity.
- 1.2.2. Their presumption of capacity.
- 1.2.3. Deprivation of liberty safeguards.
- 1.2.4. Physical intervention and restrictive practices.
- 1.2.5. Their human rights.

2. Supporting legislation.

2.1. Legislation which supports these areas include the:-

- 2.1.1. Mental Capacity Act 2005.
- 2.1.2. Health and Social Care Act 2008.
- 2.1.3. Data Protection Act 1998.
- 2.1.4. Disability Discrimination Act 1995.
- 2.1.5. Human Rights Act 1998.
- 2.1.6. Mental Health Act 1983.
- 2.1.7 Care Act 2014

3. Mental capacity.

The Mental Capacity Act 2005 (MCA) provides the legal framework for others to act and make decisions on behalf of individuals who lack the mental capacity to make informed decisions for themselves.

3.1. Every participant has the right to make their own decisions, including the right to make unwise decisions. Therefore, CN4C staff are to assume that a participant has the capacity to make such decisions unless it has been established that they do not have such capacity.

3.2. CN4C staff either working with or caring for service users who may or may not lack capacity to make specific decisions, must comply with this policy. Conformance to the requirements applies whether the decisions being made are of a significant nature or a routine matter.

3.3. A participant's capacity must not be judged simply on the basis of their age, appearance, condition or an aspect of their behaviour.

3.4. Furthermore, in order to conform to the requirements of legislation and this policy, CN4C staff are to ensure that any decision made, or actions taken, on behalf of service users who lack the capacity to make informed choices or act for themselves are made in the participant's best interests and that they are protected from harm.

3.5. Where appropriate, CN4C staff will support service users to make their own choices and to maximise their participation in any decision making process.

3.6. When service users are not able to understand the concepts or consequences involved in decision making for specific issues e.g., nominating an appointee, decisions regarding their future education and finances, etc. a formal mental capacity assessment will need to be conducted by a social worker, community LD nurse, psychologist or other authorised person.

3.7. CN4C staff should be aware that service users have the right to make decisions which others may consider to be unwise and this should not automatically be regarded as a lack of capacity.

3.8. CN4C staff should refer to their safeguarding lead if they are unsure if a participant has capacity to make a specific decision or choice. Individual service users may have been formally assessed to lack capacity in some specific situations but are able to make decisions in everyday living.

3.9. If a participant has been formally assessed to lack capacity for a specific issue (eg consent for medical treatment) then a 'best interests' decision will be made. This may involve the input of relevant people who know the participant well or who have expertise in the issue e.g. health professionals, social workers, parents/carers, psychologists, CN4C staff

4. Deprivation of liberty safeguards.

4.1. CN4C staff should be mindful that to restrict choice, movement, access to amenities, facilities and services is a deprivation of a participant's liberty. If the participant is at risk and has been formally assessed as lacking capacity the principles of the Deprivation of Liberty Safeguards need to be implemented.

The Deprivation of Liberty Safeguards are an amendment to the Mental Capacity Act 2005. They apply in England and Wales only.

The Mental Capacity Act allows restraint and restrictions to be used – but only if they are in a person's best interests.

Extra safeguards are needed if the restrictions and restraint used will deprive a person of their liberty. These are called the Deprivation of Liberty Safeguards.

4.2. What is a deprivation of liberty?

The Mental Capacity Act allows restrictions and restraint to be used, but only if they are in the best interests of a person who lacks capacity to make the decision themselves. Restrictions and restraint in CN4C can include:

Requiring a person to be supervised when out

Stopping a person from doing something which could cause them harm

Removing items from a person which could cause them harm

5. Restraint, physical intervention and restrictive practice.

5.1. Restraint can only be implemented following a Deprivation of Liberty Safeguards assessment. Restraint is not an accepted practice at CN4C therefore staff are not permitted to use restraint to deal with challenging situations. However, staff have a duty of care and if there is a real and imminent danger that a participant will be harmed without immediate physical intervention (e.g. if a participant is being assaulted, about to run into the road in front of traffic, close to dangerous machinery, fire or hot pans) then they should do all that they can to prevent injury using the minimum amount of force possible. Service users should never be forcibly held in the prone position. Mechanical restraints and devices, including ties should never be used and service users must never be locked in or confined in any way.

5.2. Physical intervention involves the application of a minimum degree of force and restriction necessary under our duty of care to prevent injury to the participant or

others if there is a real and immediate danger of serious harm. Under exceptional circumstances this may include serious damage to property.

5.3. The CN4C admission process aims to identify and decline an offer of a course to potential service users who are known to have physically challenging behavioural problems. Therefore, physical intervention or the use of force to restrict movement or mobility is extremely unlikely at CN4C.

5.4. However, it is accepted that some enrolled service users may subsequently exhibit behaviour that challenges. In these circumstances an Incident Report form should be completed in accordance with the procedure detailed on the form. This process is designed to discover exactly what occurred and not to apportion blame. The service users Individual Risk Assessment may need to be amended following any serious incident.

5.5. CN4C staff are to record any service users minor adverse behavioural incidents on case conferencing.

5.6. CN4C staff should not adopt restrictive or controlling practice when working with and supporting service users. Any identified instances of colleagues adopting such a stance are to be reported to the safeguarding lead.

5.7. Service users and their parents/carers are informed of the boundaries and systems in place to support them to learn independence skills. Clear staff guidance exists for risk assessments/support planning.

6. Human Rights.

6.1. During their attendance at CN4C, service users remain entitled to their core human rights. These include the right :-

6.1.1. To liberty and security.

6.1.2. Not to be subjected to inhuman or degrading treatment.

6.1.3. To respect and a private life.

6.1.4. Not to suffer any form of discrimination.

6.2. Therefore, CN4C staff have legal responsibilities to ensure that the above are enforced and that all service users are safeguarded from harm.