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| GROUNDWORK  GREATER MANCHESTER | |  |  |
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|  | Safeguarding Policy |  |
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**1. POLICY STATEMENT**

This policy applies to all staff, including senior managers and the Board of Trustees and Associate Members; part time and full time staff; contracted and sessional workers; students and volunteers or anyone working on behalf of Groundwork Greater Manchester, as well as young people, adults at risk and learners engaging with our services and activities. Groundwork employees and volunteers - primarily through our employment, skills, education, youth, communities and Energy Works programmes - are likely to be involved in working in some capacity with adults at risk, children and young people, some of whom may be marginalised, disaffected and vulnerable.

Our work with children involves contact with children in a wide range of settings including our own centres, schools, colleges, youth and community centres, in childrens’ homes and the external environment, and can involve day trips and leading residential events. Our work with adults at risk could include directly employing vulnerable adults or engaging them as volunteers; delivery of training, employment support or job brokerage programmes where vulnerable adults are clients or learners, including in custody; holding community events or consultations where vulnerable adults are present; providing energy advice in people’s homes or delivering specific projects or using office accommodation in a setting where vulnerable adults are present. We also recognise that we have safeguarding responsibilities for adults, particularly young adults, who are not legally defined as vulnerable but due to specific set of circumstances require additional consideration in the planning and delivery of services e.g. organisation of work placements and residentials.

The purpose of this policy is to:

* Protect adults, children and young people who participate in the activities and services that we provide. This includes the children of adults who use our services;
* Provide staff and volunteers with the principles and good practise guidelines to enable them to understand and meet their safeguarding responsibilities.

Groundwork Greater Manchester believes that an adult at risk, child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all adults at risk, children and young people and to keep them safe. We are committed to practice in a way that protects them.

We recognise that:

* + - Every adult has the right to be treated with dignity, have their choices respected and be happy and secure in their activities with Groundwork
    - The welfare of the child is paramount, as enshrined in the Children Act 1989;
    - All people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse;
    - Some children, young people and adults at risk are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues;
    - Working in partnership with children, young people, adults at risk, their parents and carers, and other agencies is essential in promoting their welfare.

We will seek to keep adults, children and young people safe by ensuring we:

* + - Provide a safe environment for adults, children and young people to take part in any activity or access any service organised by Groundwork;
    - Support children and young people to be aware of their own safety and to keep themselves safe;
    - Promote an environment where children and young people feel secure, are enabled to talk and are listened to;
    - Make decisions based on the needs of adults at risk, children and young people;
    - Have clear safeguarding policies and procedures which are in line with the Local Safeguarding Partnership or Adult Safeguarding Board in the areas in which we operate;
    - Appoint a Safeguarding Team who will take lead responsibility for dealing with safeguarding issues;
    - Provide the appropriate level of support to adults at risk, children and young people who have suffered significant harm and for staff involved in any safeguarding issue;
    - Create a culture of safer staff recruitment and adopt recruitment procedures that help deter, reject or identify people who might abuse adults at risk, children and young people;
    - Promote a culture of transparency where all staff feel able to challenge and raise concerns about poor or unsafe practice, and address these concerns sensitively and effectively;
    - Ensure all members of staff receive safeguarding training appropriate to their roles;
    - Ensure all members of staff who work with adults at risk, children and young people have regular supervision and can access support when needed;
    - Understand our duty of care to adults at risk, children and young people and staff who undertake our activities;
    - Ensure that adults at risk, children and young people are kept safe when we work in partnership with other agencies;
    - Carry out an annual review of the Safeguarding Policy and procedures, and make changes as soon as possible if any gaps or weaknesses are identified;
    - Make the policy and procedures available to adults, children and young people and their parents or carers on request.

Trust activity falls within the operational areas of the following Safeguarding Partnership and Adult Safeguarding Boards:

* + - Bolton
    - Bury
    - Manchester
    - Oldham
    - Rochdale
    - Salford
    - Stockport
    - Tameside
    - Trafford
    - Lancashire CC
    - Blackburn with Darwen

**2.0 SCOPE & LEGAL FRAMEWORK**

This policy and supporting procedures are underpinned by the following legislation and guidance:

* + - Children Act 1989
    - United Convention of the Rights of the Child 1991
    - Data Protection Act 1998
    - Sexual Offences Act 2003
    - Children Act 2004
    - The Equality Act 2010
    - Protection of Freedoms Act 2012
    - The Care Act 2014
    - Government Statement of Policy on Adult Safeguarding 2013
    - Safeguarding Vulnerable Groups Act 2006
    - The Mental Capacity Act 2005
    - Children and Social Work Act 2017
    - The Human Rights Act 1998
    - Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015
    - Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015
    - What to do if you are worried a child is being abused: Advice for Practitioners; HM Government 2015
    - Keeping Children Safe in Education 2022
    - Understanding and identifying radicalisation risk in your education setting 2022

For additional information concerning legal framework please see **Appendix 8**: **Summary of Main Legislation.**

The policy should be read in conjunction with other Trust policies as detailed in **Section 20.**

**3.0 COMMUNICATION**

This policy and procedures will be communicated to all staff at the start of their employment or volunteering with Groundwork Greater Manchester. The current version of the policy and procedures will be available to staff on the intranet at G:\Policies and Forms\Safeguarding and staff will be informed of any updates to the policy. Information about the Safeguarding Team and how to contact them will be displayed in all Groundwork Greater Manchester offices, training centres and youth clubs

The Trust has prepared a **Safeguarding Statement (Appendix 2)** with the support of a group of service-user representatives, which summarises our approach and arrangements for safeguarding staff, volunteers, visitors, learners and other service users within our service delivery. The Safeguarding Statement will be displayed in all Groundwork Greater Manchester offices, training centres and youth clubs. The Safeguarding Statement and Information about the Safeguarding Team will also be available on our website.

The Safeguarding Statement, policy and procedures will also be shared with relevant third parties including agencies we are working in partnership with, consultants and contractors. Groundwork Greater Manchester will only work in partnership with agencies that have appropriate Safeguarding policies and procedures. When working in partnership staff will ensure that a written agreement is in place as to which agency will take the lead on safeguarding.

Adults at risk, children and young people and their parents or carers if necessary, will be given information about the policy and procedures in an appropriate way when they join any activities or services, including sharing of our Safeguarding Statement. Key points to be shared include our commitment to safeguarding; staff are here to listen; who to tell if you are worried about anything; and who we will tell if we are worried about your safety.

**4.0 REVIEW ARRANGEMENTS**

The Safeguarding Management Group is responsible for the annual review of this policy. The Board of Trustees will review the revised policy on an annual basis.

**5.0 DEFINITIONS**

**5.1 Child or Young Person**

The protection of children and young people according to the terms of the Children Act 1989 defines a child/young person as someone under the age of 18. In this policy, the terms child and young person are used interchangeably.

### 5.2 Adult at Risk

An adult at risk is someone aged 18 years or over and at risk of abuse or neglect because of their needs for care and support.

The Care Act 2014 introduced statutory safeguarding duties. The safeguarding duties apply to an adult who:

* Has needs for care and support (whether or not the local authority is meeting any of those needs)
* Is experiencing, or is at risk of, abuse or neglect, and
* As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

Groundwork also includes in this definition adults we work with who may not have care or support needs but are at risk of abuse due to their circumstances.

### 5.3 Participants

### This includes all adults, children and young people that engage in our projects, programmes and activities.

### 5.4 Safeguarding Children

Safeguarding - defined in Working Together to Safeguard Children 2015 as:

* + - protecting children from maltreatment;
    - preventing impairment of children's health or development;
    - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
    - taking action to enable all children to have the best life chances

Safeguarding, and promoting the welfare of children, represents a significantly broader term than child protection. Child protection is merely part of safeguarding and refers to activities undertaken to prevent children suffering, or likely to suffer, significant harm.

### 5.5 Safeguarding Adults at Risk

Safeguarding Adults at Risk is defined in the Care Act 2014 as working with adults with care and support needs to keep them safe from abuse or neglect. In practice this includes:

* Preventing harm and reducing the risk of abuse or neglect to adults with care and support needs
* Making Safeguarding Personal by supporting adults at risk to make choices and have control in how they choose to live their lives
* Promoting an approach that results in the outcomes the person wants
* Raising awareness so that staff, participants, other professionals and communities as a whole play their part in preventing, identifying and responding to abuse and neglect.

### 5.6 Designated Safeguarding Lead (DSL)

Reference in this policy to the term ‘Designated Safeguarding Lead’ or ‘DSL’ means the Strategic and Designated Safeguarding Leads, who are senior members of staff allocated as leads for safeguarding responsibilities within Groundwork Greater Manchester and members of the Safeguarding Management Team.

### 5.7 Allegation

Reference in this policy to the term allegation means any information that suggests a member of staff, volunteer or anyone working in, or on behalf of, the Trust in a paid or unpaid capacity has:

* + - behaved in a way that has harmed, or may have harmed, a child or adult at risk
    - possibly committed a criminal offence against or related to a child or adult at risk
    - behaved towards a child or children in a way that indicates they may pose a risk of harm to children
    - behaved towards vulnerable groups in a way that indicates they may pose a risk of harm to adults at risk

### 5.8 Abuse

A form of maltreatment of an adult at risk or child, including neglect, child sexual exploitation (CSE) including forced marriage, female genital mutilation (FGM) and radicalisation. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or a child or children. Further information about the different types of abuse and signs that might indicate abuse are found in **Sections 6 and 7.**

### 5.9 Radicalisation and Prevent Duty

Under the Prevent Duty defined within the Counter-Terrorism and Security Act 2015 a wide range of agencies including local authorities, schools and colleges are required to have due regard to the need to prevent people from being radicalised and drawn into terrorism. As a provider of services for vulnerable people within local communities, including young people, Groundwork Greater Manchester recognises that we have a duty to ensure that staff are aware of and know how to contribute to Prevent-related activity in our operational areas.

More information about Prevent is found in **section 15.**

### 5.10 Disclosure and Barring Service (DBS)

The Disclosure and Barring Service (DBS) is a non-departmental public body of the Home Office. The DBS enables organisations in the public, private and voluntary sectors to make safer recruitment decisions by identifying candidates who may be unsuitable for certain work, especially that involve children or vulnerable adults. It also provides wider access to criminal record information through its disclosure service for England and Wales. Key regulations that Groundwork Greater Manchester must adhere to include:

* + - We must ensure that we do not allow a person who is barred from working with children or adults at risk, to work or volunteer with these groups. If we knowingly employ someone who is barred to work with those groups, we will be breaking the law.
    - If we dismiss a member of staff or volunteer because they have harmed a child or adult at risk, or we thought they would have done so if they had not left, we must tell the DBS.
    - It is a legal requirement for us to refer safeguarding concerns to the DBS.

**6.0 TYPES OF ABUSE AND HOW TO RECOGNISE THEM: CHILDREN AND YOUNG PEOPLE**

**6.1 Abuse of children and young people**

The following notes are taken from *What to do if you are worried a child is being abused, Advice for Practitioners; HM Government 2015*. Further detailed information on types and signs of abuse can be found on the NSPCC website <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

Abuse and neglect are forms of maltreatment – a person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Child welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. Children may be abused in a family or in an institutional or community setting, by those known to them or by a stranger, including, via the internet. In the case of female genital mutilation, children may be taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period of time, but can also be a one-off event. Child abuse and neglect can have major long-term impacts on all aspects of a child's health, development and well-being.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Disabled children may be especially vulnerable to abuse, including because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs, which may make it difficult to tell others what is happening. Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so you should also be alert to parent-child interactions that are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health. By understanding the warning signs, you can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.

There are a number of warning indicators that might suggest that a child may be being abused or neglected. Some of the following signs might be indicators of abuse or neglect:

* + - Children whose behaviour changes – they may become aggressive, challenging,
    - Disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
    - Children with clothes which are ill-fitting and/or dirty;
    - Children with consistently poor hygiene;
    - Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
    - Children who don’t want to change clothes in front of others or participate in physical activities;
    - Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
    - Children who talk about being left home alone, with inappropriate carers or with strangers;
    - Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
    - Children who are regularly missing from school or education;
    - Children who are reluctant to go home after school;
    - Children with poor school attendance and punctuality, or who are consistently late being picked up;
    - Parents who are dismissive and non-responsive to practitioners’ concerns;
    - Parents who collect their children from school when drunk, or under the influence of drugs;
    - Children who drink alcohol regularly from an early age;
    - Children who are concerned for younger siblings without explaining why;
    - Children who talk about running away;
    - Children who shy away from being touched or flinch at sudden movements.

### 6.2 Four main categories of abuse and neglect

There are four main categories of abuse and neglect: physical abuse, emotional abuse, sexual abuse including child sexual exploitation, and neglect. Each has its own specific warning indicators, which you should be alert to.

### 6.2.1 Physical abuse

Physical abuse is deliberately physically hurting a child. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment. Some of the following signs may be indicators of physical abuse:

* + - Children with frequent injuries;
    - Children with unexplained or unusual fractures or broken bones;
    - Children with unexplained bruises or cuts; burns or scalds; or bite marks;
    - An explanation which is inconsistent with an injury;
    - Several different explanations provided for an injury;
    - Unexplained delay in seeking treatment;
    - Parties connected with the individual are uninterested or undisturbed by the injury;
    - Repeated presentation of injuries;
    - Family use of different doctors and A&E departments;
    - Reluctance to give information or mention previous injuries.

### 6.2.2 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child’s emotional development.

Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child. Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child’s peers. Repeated swearing at or around children can also have a negative impact. Some of the following signs may be indicators of emotional abuse:

* + - Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
    - Parents or carers who withdraw their attention from their child, giving the child the ‘cold shoulder’;
    - Parents or carers blaming their problems on their child;
    - Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

### 6.2.3 Sexual abuse

Sexual abuse is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health.

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children. Some of the following signs may be indicators of sexual abuse:

* + - Children who display knowledge or interest in sexual acts inappropriate to their age;
    - Children who use sexual language or have sexual knowledge that you wouldn’t expect them to have;
    - Children who ask others to behave sexually or play sexual games;
    - Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

### 6.2.4 Child Sexual Exploitation

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

* + - Children who appear with unexplained gifts or new possessions;
    - Children who associate with other young people involved in exploitation;
    - Children who have older boyfriends or girlfriends;
    - Children who suffer from sexually transmitted infections or become pregnant;
    - Children who suffer from changes in emotional well-being;
    - Children who misuse drugs and alcohol;
    - Children who go missing for periods of time or regularly come home late;
    - Children who regularly miss school or education or do not take part in education.

### 6.3 Neglect

Neglect is a pattern of failing to provide for a child’s basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child’s health or development.

Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action. However, while you may be concerned about a child, neglect is not always straightforward to identify. Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse. Some of the following signs may be indicators of neglect:

* + - Children who are living in a home that is indisputably dirty or unsafe;
    - Children who are left hungry or dirty;
    - Children who are left without adequate clothing, e.g. not having a winter coat;
    - Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
    - Children who are often angry, aggressive or self-harm;
    - Children who fail to receive basic health care;
    - Parents who fail to seek medical treatment when their children are ill or are injured.

### 6.4 Specific Safeguarding Issues

There are also specific safeguarding issues detailed below and for which some further information is provided. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on these issues and should be consulted should the need arise:

**6.4.1 Bullying Including Cyber-bullying** - behaviour by an individual or group, repeated over time that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance cyber-bullying via internet, text message) and is often motivated by prejudice against particular groups. It can result in the intimidation of a person or persons through threat of violence or by isolating them either physically or online.

**6.4.2 Child on child abuse -** All staff should be aware that children can abuse other children (child-on-child abuse), and that it can happen both inside and outside of school, colleges or within Groundwork provisions and online. Groundwork expects all youth and education staff in particular to be aware of these issues and understand the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports within Groundwork education provision it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to a DSL, and they should challenge inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse can include (but is not limited to) bullying (including cyberbullying, prejudice-based and discriminatory bullying); sexual violence and sexual harassment; physical abuse; upskirting, sexting and initiating / hazing type violence and rituals.

**6.4.3 Children with family members in prison:** approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

**6.4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):** Both CSE and CCE are forms of abuse that occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/ or for the financial advantage or increased status of the perpetrator or facilitator and / or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening / committing serious violence to others. County lines can be a geographically widespread form of harm : drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

**6.4.5 Domestic Abuse** - any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 and over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial or emotional. There are additional concerns for children living in homes where domestic abuse and / or violence has taken place as exposure to it can have a serious long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

**6.4.6 Drugs** - including alcohol, tobacco, illegal drugs, medicines, new psychoactive substances or NPS (previously known as legal highs) and volatile substances. This includes use or misuse by the participant or the impact of use or misuse by others on a participant.

**6.4.7 Fabricated or Induced Illness** - there are three main ways for a carer to fabricate or induce an illness. These are not mutually exclusive and include fabrication of signs and symptoms and may include fabrication of past history; fabrication of signs and symptoms and falsification of hospital records and specimens of bodily fluids; induction of an illness by a variety of means.

**6.4.8 Faith Abuse** - this includes; belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray; ritual murders; use of belief in witchcraft or magic to create fear to make children more compliant when they are being trafficked to domestic slavery or sexual exploitation.

**6.4.9 Female Genital Mutilation** (FGM) - a procedure where the female genitals are deliberately cut, injured or changed, but where there is no medical reason for this to be done. There is a range of indicators that a child or young person may be at risk of FGM, which individually may not indicate risk, but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice, or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. There is a specific legal duty on teachers to report to the police if they discover that an act of FGM appears to have been carried out on a girl under the age of 18.

**6.4.10 Forced Marriage** - A young person, male or female, may raise concerns that they fear they are going to be forced into marriage. This is quite different from an arranged marriage and is a marriage where the young person does not consent. In such cases, staff should refer the matter to the DSL and must not talk to the parents. Guidance is available from the Foreign and Commonwealth Publication, Forced Marriage Guidelines on [www.fco.gov.uk](http://www.fco.gov.uk/)

**6.4.11 Gangs and youth violence -** ‘Street gangs’ for whom crime and violence are a core part of their identity. Staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime including involvement with county lines networks. Signs include increased absence from school, a change in friendship or relationships with older individuals or groups, a significant decline in performance at school or college, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

**6.4.12 Sex and Gender based violence/violence against women and girls (VAWG)** - violence, physical, sexual or otherwise, stalking and harassment and female genital mutilation. Includes transgender violence.

**6.4.13 Grooming -** when someone builds an emotional connection with a child or young person to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking**.** Grooming can take place face- to-face or online. Groomers will often gain the trust of family members, carers or colleagues to enable them to spend time alone with the individual.

**6.4.14 Hate crime** - any crimes that are targeted at a person because of hostility or prejudice towards that person’s disability, race or ethnicity, religion or belief, sexual orientation, or transgender identity.

**6.4.15 Homelessness –** being homeless or being at risk of homeless presents a real risk to a child’s welfare. For children homelessness will generally be considered in the context of the child’s family circumstances. It should also be recognised in some cases 16 and 17 year olds could be living independently from their parent or guardians, and will require different level of intervention and support.

**6.4.16 Mental health** - a mental health problem may make someone more vulnerable to abuse or may make it harder for them to take the first step in seeking help.

**6.4.17 Radicalisation** - the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for violence. Further information can be found in Section 15 Prevent Duty Procedure.

**6.4.18 Sexting (also known as youth produced sexual imagery)** – consensual and non-consensual sharing of nude and semi-nude images and / or videos through mobile picture messages, webcams or over the internet.

**6.4.19 Teenage Relationship Abuse** – can include emotional abuse, physical abuse, sexual abuse or financial abuse (taking control of money and/or forcing a teenager to buy things or work/not work).

**6.4.20 Trafficking and modern slavery** – people are recruited, moved or transported and then exploited, forced to work or sold. Someone is in slavery if they are forced to work through coercion, or mental or physical threat; owned or controlled by an ’employer’, through mental or physical abuse or the threat of abuse; dehumanised, treated as a commodity or bought and sold as ‘property’; physically constrained or have restrictions placed on their freedom of movement.

**6.4.21 Upskirting –**this typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

**6.4.22 Young people who are sexually active** - under most circumstances where staff have knowledge of a young person's sexual relationships this should be considered to be a normal part of a young person's development. The age of the young people involved should only be an issue where there is concern about a young person's ability to give genuine consent or where there appears to be an imbalance of power within that relationship. If staff become aware that a young person aged under 13 has been involved in penetrative sex or other intimate sexual activity, action must be taken.

**6.4.23 Young people who are themselves parents** - staff may work with young people who are themselves parents. If there are concerns about a young person's care of their child, it is important to be open and honest about these concerns and about action that needs to be taken to address them. In most situations, staff should discuss the concerns with the young person (parent). If staff have any concerns that doing so will place the child, the young person or the staff member at risk they should discuss the situation with the Designated Safeguarding Lead first.

For further information and access to other relevant guidance, staff should refer to:

<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf>

**7.0 TYPES OF ABUSE AND HOW TO RECOGNISE THEM: ADULTS**

The Care Act 2014 defines the following areas of abuse and neglect; they are not exhaustive but are a guide to behaviour that may lead to a safeguarding enquiry. This includes:

|  |
| --- |
| **7.1 Physical Abuse**  The physical mistreatment of one person by another which may or may not result in physical injury, this may include slapping, burning, punching, unreasonable confinement, and pinching, force-feeding, misuse of medication, shaking, inappropriate moving and handling. |
| **Signs and indicators**  Over or under use of medication, burns in unusual places; hands, soles of feet, sudden incontinence, bruising at various healing stages, bite marks, disclosure, bruising in the shape of objects, unexplained injuries or those that go untreated, reluctance to uncover parts of the body. |
| **7.2 Sexual abuse**  Any form of sexual activity that the adult does not want and / or have not considered, a sexual relationship instigated by those in a position of trust, rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. |
| **Signs and indicators**  Signs of being abused may include recoiling from physical contact, genital discharge, fear of males or females, inappropriate sexual behaviour in presence of others, bruising to thighs, disclosure, and pregnancy. Abusers may take longer with personal care tasks, use offensive language, work alone with clients, or show favouritism to clients. |
| **7.3 Financial or material abuse**  Including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits |
| **Signs and indicators**  This may includenot allowing a person access to their money, not spending allocated allowance on the individual, denying access to their money, theft from the individual, theft of property, misuse of benefits. There may be an over protection of money, money not available, forged signatures, disclosure, inability to pay bills, lack of money after payments of benefits or other, unexplained withdrawals. An abuser may be evasive when discussing finances, goods purchased may be in the possession of the abuser, there may be an over keenness in participating in activities involving individuals money |
| **7.4 Psychological and/or Emotional abuse**  This abuse may involve the use of intimidation, indifference, hostility, rejection, threats of harm or abandonment, humiliation, verbal abuse such as shouting, swearing or the use of discriminatory and or oppressive language. A deprivation of contact, blaming, controlling, coercion, harassment, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks. There may be a restriction of freedom, access to personal hygiene restricted, name calling, threat to withdraw care or support, threat of institutional care, use of bribes or threats or choice being neglected |
| **Signs and indicators**  Stress and / or anxiety in response to certain people, disclosure, compulsive behaviour, reduction in skills and concentration, lack of trust, lack of self-esteem, someone may be frightened of other individuals, there may be changes in sleep patterns |
| **7.5 Neglect and acts of omission**  Behaviour by carers that results in the persistent or severe failure to meet the physical and or psychological needs of an individual in their care. This may include ignoring medical, emotional or physical care needs, failure to provide access to appropriate health-care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating,wilful failure to intervene or failing to consider the implications of non-intervention in behaviours which are dangerous to them or others, failure to use agreed risk management procedures, inadequate care in residential setting, withholding affection or communication, denying access to services. |
| **Signs and indicators**  There may be disclosure. Someone being abused may have low self-esteem, deterioration, depression, isolation, continence problems, sleep disturbances, pressure ulcers. There may be seemingly uncertain attitude and cold detachment from a carer, denying individuals request, lack of consideration to the individuals request, denying others access to the individual health care professionals. |
| **7.6 Self-neglect**  This covers a wide range of behaviour neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding. |
| **7.7 Discriminatory Abuse**  This includes forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation, and religion or health status and may be the motivating factor in other forms of abuse. It can be personal, a hate crime or institutional |
| **Signs and indicators**  There may be a withdrawal or rejection of culturally inappropriate services e.g. food, mixed gender groups or activities. Individual may simply agree with the abuser for an easier life, there may be disclosure, or someone may display low self-esteem. An abuser may react by saying “ I treat everyone the same”, have inappropriate nick names, be uncooperative, use derogatory language, or deny someone social and cultural contact. |
| **7.8 Institutional or Organisational Abuse**  Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one’s own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. |
| **Signs and indicators**  This may include a system that condones poor practice, deprived environment, lack of procedures for staff, one commode used for a number of people, no or little evidence of training, lack of staff support/supervision, lack of privacy or personal care, repeated unaddressed incidents of poor practice, lack of homely environment, manager implicated in poor practice. There may be a lack of personal clothing, no support plan, lack of stimulation, repeated falls, repeated infections, unexplained bruises/burns, pressure ulcers, unauthorised deprivation of liberty. Abusers may have a lack of understanding of a person’s disability, misuse medication, use illegal controls and restraints, display undue/inappropriate physical intervention, and inappropriately use power/control. |
| **7.9 Domestic abuse**  The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:   * Psychological * Sexual * Financial * Emotional   A new offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence will impose a maximum 5 years imprisonment, a fine or both. |
| **Signs and indicators**  May include many of those indicators listed under previous categories in this document, including unexplained bruising, withdrawal from activities, work or volunteering, not being in control of finances, or decision making. |
| **7.10 Modern slavery**  Encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. |
| **Signs and indicators**  There may be signs of physical or psychological abuse, victims may look malnourished or unkempt, or appear withdrawn. Victims may rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. They may be living in dirty, cramped or overcrowded accommodation, and / or living and working at the same address. Victims may have no identification documents, have few personal possessions and always wear the same clothes day in day out. What clothes they do wear may not be suitable for their work. People may have little opportunity to move freely and may have had their travel documents retained, e.g. passports. They may be dropped off / collected for work on a regular basis either very early or late at night. Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family. |
| **7.11 Radicalisation to terrorism**  The Government through its PREVENT programme has highlighted how some adults may be vulnerable to radicalisation and involvement in terrorism. This can include the exploitation of vulnerable people and involve them in extremist activity**.** Radicalisation can be described as a process, by which a person to an increasing extent accepts the use of undemocratic or violent means, including terrorism, in an attempt to reach a specific political/ideological objective. Vulnerable individuals being targeted for radicalisation/recruitment into violent extremism is viewed as a safeguarding issue**.** |
| **Signs and indicators**  May include being in contact with extremist recruiters. Articulating support for violent extremist causes or leaders. Accessing violent extremist websites, especially those with a social networking element. Possessing violent extremist literature. Using extremist narratives to explain personal disadvantage. Justifying the use of violence to solve societal issues. Joining extremist organisations. Significant changes to appearance and/or behaviour. |

**7.12 Who might abuse adults?**

Abuse of adults at risk, may be perpetrated by a wide range of people including relatives, family members, professional staff, paid care workers, volunteers, other service users, neighbours, friends and associates, people who deliberately exploit vulnerable people and strangers.

Incidents of abuse may be one-off or multiple, and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm.

Patterns of abuse vary and include:

* + - Serial abusing in which the perpetrator seeks out and ‘grooms’ individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse;
    - Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse;
    - Opportunistic abuse such as theft occurring because money or jewellery has been left lying around.

# 8.0 ORGANISATION AND STAFF RESPONSIBILITIES

### 8.1 Board of Trustees

The Trustees are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the Trust’s ethos and that these are reflected in the day-to-day safeguarding practices. The Trustees will be responsible for establishing that the Trust has effective policies and procedures in place in accordance with this policy and through monitoring compliance with them.

The Associate Board Member for Safeguarding is: Susan Southworth

The **Associate Board Member for Safeguarding** will support the management and staff team to effectively meet its responsibilities by championing Safeguarding at the Groundwork Greater Manchester Board, and by providing a point of escalation should serious concerns arise, or where Whistleblowing procedures are implemented. They will:

• support the Safeguarding Team, management and staff teams to effectively meet their safeguarding responsibilities;

• provide a point of escalation for matters relating to staff and/ or whistleblowing;

• promote a culture of safeguarding within the organisation;

• understand and manage the risks arising from safeguarding, including an understanding of the contexts in which the Trust operates and the associated risks;

• ensure that policies and procedures are in place to support safeguarding in practice within the organisation;

• ensure that policies and procedures are in place to investigate complaints thoroughly, robustly, fairly and sensitively;

• ensure that the views of children, young people and adults at risk are listened to and taken into account when decisions are made;

• work to achieve transparency and accountability across the organisation in relation to safeguarding;

• ensure the Board of Trustees retains oversight of the Safeguarding policy and practice within the organisation, and ensure the Board are appraised of any significant safeguarding issues.

### 8.2 Executive Director and Strategic Safeguarding Lead

The Executive Director will specifically ensure that:

* + - The policies and procedures approved by the Board are fully implemented and followed by all staff and that these policies and procedures reflect the Groundwork Federation Quality Standards for Safeguarding;
    - Sufficient resources and time are allocated to enable the DSLs to discharge their responsibilities, including taking part in strategy discussions and inter-agency meetings, undertaking training and development and managing internal procedures and reports;
    - All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and that such concerns are addressed sensitively and effectively in a timely manner.

The implementation of these responsibilities has been designated to the Strategic Safeguarding Lead, a member of the Strategic Safeguarding Team.

**8.3 Role and Responsibilities of Designated Safeguarding Leads (DSL) and Safeguarding Management Group**

Within the Trust there are four designated members of staff who take on the role of Strategic and Designated Safeguarding Lead (DSL). Along with the Associate Board Member for Safeguarding, the DSL’s form the Trust Safeguarding Group. The terms of reference for the group are included as **Appendix 3**. The group jointly direct and support other staff in managing safeguarding concerns, including ensuring that all staff and volunteers working with children or vulnerable adults are aware of signs which may indicate possible abuse or harm and what action they should take where abuse or harm is suspected. The DSL Role Description is included as **Appendix 4.**

All staff will be made aware of who the DSL’s are and how to contact them, with DSL staff photographs and contact details displayed on Safeguarding posters in Trust premises and within relevant materials provided at outreach settings. Staff should ensure they have the contact details available at all times for the Safeguarding Team when working with children, young people or adults at risk.

The duties of the DSL’s will include:

* + - Ensuring there is a structured procedure applicable across the organisation to be followed by all members of staff and volunteers in cases of suspected abuse;
    - Acting as first point of contact for staff in raising a safeguarding concern and seeking advice, logging all concerns in a central record;
    - Referring cases of suspected abuse or allegations of abuse to the relevant investigating agencies;
    - Liaising and co-operating with the Local Safeguarding Partnership and Children’s Social Care Team, in each area in which the Trust operates, ensuring that local guidance on thresholds, reporting and recording procedures are followed;
    - Liaising with Designated Safeguarding Leads responsible for delivering activities on our behalf, to ensure that concerns are addressed in a satisfactory and timely way;
    - Liaising and co-operating with the Local Safeguarding Adults Board and Adult Social Care Teams in each area in which the Trust operates, ensuring that local guidance on reporting and recording procedures are followed;
    - Working closely with staff to support children, young people and adults at risk where abuse is suspected or disclosed;
    - Providing advice and support to staff on issues relating to safeguarding;
    - Leading on the development and maintenance of organisational policies and procedures around Safeguarding;
    - Ensuring overall appropriate vetting procedures are in place and followed, in liaison with all Trust staff involved in recruitment or appointment of sub-contractors or partners delivering services on behalf of the Trust;
    - Inducting all new staff and volunteers on safeguarding procedures;
    - Ensuring that staff have read, understood and are able to carry out this policy;
    - Coordinating awareness-raising and training for Groundwork staff, including maintaining an up to date record of staff training and awareness sessions;
    - Establishing and maintaining the Trust’s Child and Adult Protection Files in accordance with organisational policy, including confidentiality;
    - Informing the Executive Director of any significant issues and ongoing investigations;
    - Briefing the Safeguarding lead Board Member where appropriate;
    - Supporting the CAP board in ensuring there is trustee oversight of the delivery of this policy.

Staff should be aware that they can discuss any concerns regarding vulnerable adults, children, young people or their families with a DSL to enable guidance to be provided including in situations where the DSL decides no further action is required in line with this policy.

As a member of the Groundwork Federation the Safeguarding Management Group have access to best practise support and advice through the national Safeguarding group of Groundwork senior safeguarding practitioners.

**8.3.1 Arrangements for Management of Safeguarding Procedures**

* + - The DSL’s will receive regular training and development to ensure that they keep up to date with changes in legislation, local authority safeguarding procedures and development of good practice. This will include as a minimum external DSL training every 2 years.
    - The role of the DSL will be included within each member of staff’s job description and time will be allocated to ensure effective completion of these duties. The DSL Role Description is included as **Appendix 4**.
    - The DSLs will meet on at least a quarterly basis to review safeguarding reports and actions, policies and procedures and agree any changes in procedures or staff training needs. Additional meetings will be convened to review specific child protection cases or allegations as required.
    - The Safeguarding Management Team will reflect on instances where safeguarding procedures have been implemented both within the Trust and on a local or national basis, ensuring that lessons are applied to practice across the Trust.
    - The DSLs will produce a quarterly report in consultation with the Associate Board Member for Safeguarding, for inclusion within Board papers.

**8.3.2 Arrangements for Contacting DSLs and Duty Safeguarding Lead**

The contact details for the current members of the safeguarding team are detailed below. A rota is in place for one member of the team to act as the Duty Safeguarding Lead at all times, and staff should always seek to contact the Duty Safeguarding Lead in the first instance to seek advice or report any concerns. A dedicated DSL mobile phone will be provided and the number will be shared with all staff, Trustees and Associate Board Members.

**The Duty Safeguarding Contact details are as follows:**

**Tel: 07788 714099**

**E: GM.safeguarding@groundwork.org.uk**

The contact details for the DSL’s are:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Name** | Venetia Knight | Jill Eckersley | Liane Kirk | James O’Farrell |
| **Job Title** | Head of Employment & Enterprise | Prince’s Trust Manager | Youth Employment Programme Manager | Youth Work Manager |
| **Safeguarding Role** | Strategic Safeguarding Lead | Designated Safeguarding Lead | Designated Safeguarding Lead | Designated Safeguarding Lead |
| **Mobile No.** | 07790 800989 | 07739 978794 | 07867 354442 | 07800849705 |
| **Email** | [Venetia.knight@groundwork.org.uk](mailto:Venetia.knight@groundwork.org.uk) | Jill.eckersley@groundwork.org.uk | Liane.kirk@groundwork.org.uk | [james.ofarrell@groundwork.org.uk](mailto:james.ofarrell@groundwork.org.uk) |
| **Main Office** | Birchcroft | Birchcroft | Birchcroft | Birchcroft |

### 8.4 Team Managers

Individual team managers will be responsible for:

* + - Monitoring compliance of safeguarding procedures by all staff and volunteers in their teams, ensuring sufficient time and resources are included within project planning
    - Ensuring all staff and volunteers are able to attend relevant safeguarding training identified by DSLs
    - Ensuring compliance with safe recruitment practices for all staff, volunteers and individuals engaged to deliver services relating to adults at risk or children and young people on behalf of the Trust.

### 8.5 Staff Responsibilities

* + - All staff must attend prescribed safeguarding training and briefings identified by DSLs and familiarise themselves with additional written reports or briefings.
    - All staff are advised to maintain an attitude that ‘it could happen here’ where safeguarding is concerned and be alert to the potential abuse of children or adults in different settings.
    - All staff should know how to recognise and act upon indicators of abuse or potential abuse involving children or adults. There is a responsibility for all staff members working with children and young people to respond to any suspected or actual abuse of a child in accordance with Trust procedures and similarly relating to adults at risk.
    - All staff should understand how to address other concerns about an adult or child’s welfare that do not relate to actual or suspected harm or abuse.
    - All staff should have due regard to the need to prevent adults, children and young people from being drawn into terrorism under the Prevent Duty (July 2015). They should always act in the best interests of the child in these circumstances.

**9.0 STAFF AND TRUSTEE TRAINING**

### 9.1 Induction

All staff and volunteers within Groundwork will receive a safeguarding training session delivered by a DSL, covering the Safeguarding Policy, child protection procedures and related policies as part of their induction programme.

This training session will include:

* + - Ensuring staff are aware of and conversant with the Safeguarding Policy and child protection procedures, and their own responsibilities in this area
    - Understanding what constitutes abuse
    - How to prevent situations in which abuse may occur
    - What to do when abuse is alleged or suspected
    - Arrangements for working with partners and sharing information, relevant to their job role.
    - Overview of Prevent Duty
    - Overview of E:Safety and Social Media Policies

### 9.2 Certificated Introductory Training

All staff working with children, young people and families will be required to attend a suitable certificated introduction to safeguarding course every 3 years, organised through a Local Safeguarding Children Board, or an approved partner. Training for new staff, who do not have a recent certificate, will be booked as soon as possible during their probationary period.

All staff working with adults at risk will be required to attend a suitable introduction to safeguarding course every 3 years, organised through an Adult Safeguarding Board, an approved partner or appropriate online training.

All staff working with children, young people, families and or delivering adult training or community-based provision will be required to at attend a suitable Prevent Duty training course delivered by GM Police, other approved provider or approved online training every 3 years, or within their initial 6-month probationary period.

### 9.3 Special Interest Training and Briefings

The DSL’s, in consultation with relevant Team Managers will co-ordinate additional safeguarding training across the organisation for each year in response to identified training needs and opportunities, policy changes, new project work or serious case reviews.

Training may involve

* + - Courses or e:learning modules for individuals, or small groups of staff requiring additional or specialist knowledge
    - Mandatory briefing sessions for all relevant staff and volunteers, which may include staff from other partner agencies
    - DSL’s will ensure all staff working with children and families complete relevant sexual harassment / child on child abuse training and online safety training.

All staff identified as required to attend training organised by DSLs must attend; and will be personally liable for payment of any fees issued by external training providers for non-attendance unless a valid sick note is provided.

A record of all safeguarding training completed will be recorded on central training database, incorporating course evaluation feedback, and on individual training records.

**9.4 Making Safeguarding Personal: Adults**

Through our staff training, we will ensure that we support service users by making safeguarding personal, which means it should be person-led and outcome-focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety.

We aim to empower our service users and provide them with the information they need to make decisions into how to be safe from abuse and reduce risks.

We recognise that adults may make decisions that might be perceived as risky or unwise.

Adults must be assumed to have capacity to make their own decisions and be given all practicable help before anyone treats them as not being able to make their own decisions. Where an adult is found to lack capacity to make a decision then any action taken, or any decision made for, or on their behalf, must be made in their best interests.

We need to understand and always work in line with the Mental Capacity Act 2005 (MCA) and seek support and guidance when we have concerns regarding an adult’s capacity.

**9.5 Trustee Training**

All Trustees will receive a Safeguarding Training Induction provided by a DSL to introduce them to the Trust’s Safeguarding Policies and Procedures and understand their safeguarding responsibilities as a Trustee. We will provide regular training focused on safeguarding and the Prevent Duty to ensure Trustees have sufficient knowledge to ensure that the Trust policies and procedures are effective.

**10.0** **DEALING WITH DISCLOUSRES OR CONCERNS ABOUT A CHILD OR YOUNG PERSON**

Groundwork staff have regular contact face to face or online with children and young people primarily through youth, education, community, skills and employment programmes and are likely to be involved in working closely with these groups, some of whom may be marginalised, disaffected and vulnerable. Working in this close proximity means that Groundwork staff may become aware of a situation where a child or young person is at risk of suffering significant harm.

The following procedure aims to support staff to respond effectively to a safeguarding disclosure or concern. The same procedure should be followed if a participant makes a disclosure of historical abuse, even if they are no longer in contact with the alleged abuser.

### 10.1 Ways abuse might be brought to your attention:

* + - A participant might make a direct disclosure about themselves, or about another participant;
    - A participant might offer information that is worrying but is not a direct disclosure;
    - A member of staff might be concerned about a participants’ appearance or behaviour or about the behaviour of a parent or carer towards a participant;
    - A parent, carer or third party might make a direct disclosure about a participant or offer information that is worrying but is not a direct disclosure.

### 10.2 Talking to a participant who has told you that he/she or another participant is being abused:

* + - Reassure the participant that telling someone was the right thing to do;
    - Tell the participant that you now have to do what you can to keep them (or another participant) safe;
    - Tell the participant what you are going to do next and who else needs to know about it;
    - Let the participant tell their whole story - don’t try to investigate or question the participant but do make sure that you are clear about what they are saying;
    - Ask the participant what they would like to happen as a result of what they have said, but do not make or infer promises that you cannot keep.
    - Give them the Childline phone number: 0800 1111

### 10.3 Action to be taken by staff if concerns are raised or a disclosure is made:

* + - Contact The Duty Safeguarding Lead , or another member of the Safeguarding Team if required, as soon as possible and inform them of the disclosure or concerns;
    - Make a written recording using the **Safeguarding Report Form (Appendix 1);**
    - Pass any written information to the Designated Safeguarding Lead safely and securely and do not keep any records for yourself.

On receiving a disclosure or concern, the Designated Safeguarding Lead will decide on the best course of action, which may include:

* liaising with the Designated Safeguarding Lead for the delivery partner responsible for delivery of services on behalf of Groundwork, to ensure that the matter is being addressed in line with this policy;
  + - Seeking advice from the Child Social Care department or the NSPCC helpline;
    - Making a referral to the Child Social Care department - if a referral is made the Designated Safeguarding Lead will follow this up in writing within 48 hours;
    - completing an Early Help Assessment or liaising with other agencies to ensure that an Early Help Assessment is completed with children or young people where necessary. For more guidance see section;
    - Making decisions about who else needs to know and how this will be done;
    - Making a referral to another agency for specialist support and advice

The Designated Safeguarding Lead will add information to the Safeguarding Report Form that has been submitted by the person receiving the disclosure or raising the concern, and will keep and maintain any written records in line with the Recording and Information Sharing Guidelines.

### 10.4 Helping a participant in immediate danger or in need of emergency medical attention:

* + - If the participant is with you, remain with them and call the police;
    - If the participant is elsewhere, contact the police and explain the situation to them;
    - If the participant needs emergency medical attention, call an ambulance and while you are waiting for it to arrive, provide first aid help;
    - Contact the Designated Safeguarding Lead as soon as possible to let them know what is happening.

A decision will need to be made about informing the participants’ family and the Child Social Care department, when they should be informed, and who should do this. This should be done together with the police and/or health services.

Once the immediate danger or emergency medical need has been dealt with, staff should follow the guidelines on dealing with disclosures and concerns.

### 10.5 When to talk to parents or carers

Staff should discuss with the Designated Safeguarding Lead before deciding whether parents or carers should be informed of a disclosure or any concerns. Always consider the welfare of the participant in your decision making. The issues that will need to be taken into account are the participants’ wishes and feelings; the parent or carers’ right to know – unless this would place the participant or someone else in danger, or would interfere with a criminal investigation; the impact of telling or not telling the parent or carer; the current assessment of risk to the participant and the source of that risk; and any risk management plans that currently exist.

### 10.6 External contacts

Groundwork Greater Manchester recognise that on rare occasions when staff are working on evenings and at weekends that they may be unable to contact a Designated Safeguarding Lead. In these cases, if a disclosure or concern is raised staff may contact the relevant Child Social Care Team or the NSPCC helpline directly. Staff must make sure that they contact the Duty Safeguarding Lead as soon as possible, and complete all actions as outlined above. External contact details can be found in section 10.8 below.

### 10.7 Contracted and partnership work

When working in partnership, disclosures, concerns or allegations of abuse must be reported in line with these procedures, but may also need to be reported to the Designated Safeguarding Lead within the partner organisation. Staff should agree reporting procedures in advance and in writing with the partner organisation, including within Service Level Agreement where appropriate. For work organised by Groundwork Greater Manchester staff should use the **Partner Agreement Form (Appendix 6),** and for contracted work staff should use paperwork provided by the partner or contract manager.

**10.8 External Contact Details**

NSPCC helpline: 0808 800 5000

Childline 0800 1111

|  |  |  |
| --- | --- | --- |
| **Local Authority Area** | **Children and Young People Social Care Team** | |
| **Office Hours** | **Out of Hours** |
| Bury (MASH Team) | 0161 253 5678 | 0161 253 6606 |
| Bolton | **01204 331500** | **01204 337777** |
| Manchester | 0161 234 5001 | 0161 234 5001 |
| Oldham (MASH Team) | 0161 770 7777 | 0161 770 6936 |
| Rochdale | 0300 303 0440 | 0300 303 8875 |
| Salford | 0161 603 4500 | 0161 794 8888 |
| Stockport | 0161 217 6028 | 0161 718 2118 |
| Tameside | **0161 342 4477** | 0161 342 2222 |
| Trafford | 0161 912 5125 | 0161 912 2020 |
| Lancashire County Council | 0300 123 6720 | 0300 123 6722 |
| Blackburn with Darwen | 01254 666 400 | 01254 587 547 |

**10.9 Procedures for Early Help**

Early help or early intervention is support that is given as soon as a problem emerges. Early help aims to improve outcomes for children and young people, and can be delivered to children and young people themselves, parents or whole families.

Some children or young people are more likely to need early help than others. This includes children or young people who have been excluded from school, have special educational needs, are disabled, are in care, are leaving or preparing to leave care, are young carers, are young parents (or about to become young parents), are experiencing housing issues.

Staff should be aware of the signs that a child or young person may benefit from early help. These are wide ranging but may include:

* displaying disruptive or anti-social behaviour
* being bullied or bullying others
* having poor attendance at school
* being involved in, or at risk of, offending
* having poor general health
* having anxiety, depression or other mental health issues
* misusing drugs or alcohol
* having a particularly challenging relationship with parents or appearing to be unusually independent from their parents
* experiencing difficulties at home, such as domestic abuse, parental substance abuse or parental mental health problems

If staff think that a child or young person is in need of early help, they should complete a Safeguarding Report Form and discuss their concerns with the Designated Safeguarding Lead. The Designated Safeguarding Lead should refer to the relevant Local Safeguarding Partners Threshold Guidance and decide whether an Early Help Assessment is needed.

If an Early Help Assessment is needed the Designated Safeguarding Lead will follow the assessment and reporting processes provided by the Local Safeguarding Partners, ensuring that an appropriately trained member of staff completes the assessment. An early help assessment will only be completed with the consent of the child or young person and their parent or carer if necessary.

The Designated Safeguarding Lead may decide that Groundwork is not best placed to complete an Early Help Assessment. This may be the case if staff working with the child or young person are not appropriately trained. In this instance the Designated Safeguarding Lead will work with the relevant Child Social Care Team and other agencies that are also in contact with the child, young person or family to ensure that an appropriate professional completes the assessment.

**11.0 PROCEDURES FOR SUSPECTED OR REPORTED ABUSE OF ADULTS**

The following procedure refers to abuse or suspicion of abuse that staff or volunteers become aware of during their work with the Trust or partners.

The concern may have arisen as a result of:

* + - A direct disclosure from the vulnerable adult concerned;
    - Observation of behaviour; or
    - An adult at risk’s relative, friend, carer or another member of Trust staff making a disclosure.

**11.1 – Step 1**

Concerns or allegations should be reported immediately and given priority over other areas of work. Staff should contact the Duty Safeguarding Manager and complete a Safeguarding Report Form. All discussions between a staff member and the DSL should be fully recorded and signed by both parties as an accurate record of their discussion.

Early sharing of information is the key to providing an effective response where there are emerging concerns. To ensure effective safeguarding arrangements no member of staff or volunteer should assume that someone else would pass on information that they think may be critical to the safety or wellbeing of an adult.

In most situations, there will not be an immediate threat and the decision about protecting the person with safeguarding needs will be taken in consultation with themselves and / or social services. However, there are some cases that require an urgent response:

* + - If you suspect a serious criminal act has taken place, telephone the police on 999. Tell them if you think it might be adult abuse.
    - If the individual is injured, seek immediate medical treatment. Tell the ambulance personnel or A&E staff that this is a potential adult abuse situation.

**11.2 – Step 2**

Following discussion with the DSL a course of action will be agreed which may involve making a referral to social services, or other agency. We will:

* + - Inform the adult of the action we propose to take
    - Seek their agreement for any referral
    - Ensure they are kept informed about what will happen next, so they can be reassured about what to expect
    - Endeavour to ensure they are safe and supported before proceeding with any action
    - Inform the adult if we are planning to seek advice from or report concerns to an external agency

**11.3 – Step 3**

Where it is decided that a referral should be made to the relevant social services department the DSL will make the referral and hand over responsibility for investigating the matter to social services. The DSL should provide assistance to social services if requested to do so, but the DSL should never take the lead role in investigating an allegation.

The DSL should follow up a telephone referral to social services with a written referral within 3 working days.

The process is summarised in the flow chart detailed below.

**11.4 Record Keeping**

It is vital that a written record of any incident or allegation of abuse is made by the staff member raising the concern, with a copy held in the Adult Safeguarding Files. This must include the details of any discussion between the staff member and the DSL and the action taken. All notes must be signed and dated in case they are needed as evidence at a later date. **A Safeguarding Report Form (Annex 1)** should be used. Pass any written information to the Designated Safeguarding Lead safely and securely and do not keep any records for yourself.

When making a referral to social services, the DSL should make a note of the name of the person they spoke to and the date and time that the referral was made.

People have a right to confidentiality, and all information relating to an allegation of abuse must be kept strictly confidential. Records should be kept secure and separate from other Trust documents.

**11.5 Reporting Abuse Procedures: Key Points**

If you suspect that a vulnerable adult is being abused, you should:

* + - Discuss your concerns with the DSL, completing a Safeguarding Report Form (Appendix 1), with the details of your concern. A full record of your discussion and concerns must be signed and dated by both members of staff.
    - Referrals of concern must be made by the DSL to the relevant Local Authority Adult Social Care Team, by telephone.
    - The DSL must follow up a telephone report with a written report within 3 working days.
    - If there is a real emergency and an immediate risk of significant harm to the vulnerable adult concerned and a DSL or Duty Manager are not available to discuss the matter with, you should make a referral to the relevant adult social care team. You should then ensure that the DSL has a full update to pick up the matter at the earliest opportunity.

**11.6 Emergency Contact Details**

|  |  |  |  |
| --- | --- | --- | --- |
| **Local Authority Area** | **Reporting concerns to Adult Social Care Teams** | | |
| **Office Hours** | **Out of Hours** | **Email** |
| Bury | **0161 253 5151** | **0161 253 6606** |  |
| Bolton | [01204 337000](tel:01204337000) | 01204 337777 | Make online referral |
| Manchester | 0161 234 5001 | 0161 234 5001 | mcsreply@manchester.gov.uk |
| Oldham | 0161 770 7777 | 0161 770 6936 |  |
| Rochdale | 0300 303 8886 | 0300 303 8875 | [adult.care@rochdale.gov.uk](mailto:adult.care@rochdale.gov.uk) |
| Salford | 0161 631 4777 | 0161 631 4777 | Online form |
| Stockport | 0161 217 6029. | 0161 718 2118 | adult.social.care@stockport.gov.uk |
| Tameside | 0161 922 4888 | 0161 342 2222 |  |
| Trafford |  |  | AdultSafeguardinghub@trafford.gov.uk |
| Lancashire County Council | 0300 123 6720 | 0300 123 6721 |  |
| Blackburn with Darwen | 01254 585949 | 01254 587547 |  |

**11.7 Preventative measures for adults at risk**

The Designated Safeguarding Lead should give careful consideration to whether a safeguarding response is appropriate for an adult at risk. Such a response is only appropriate if the adult is, as a result of their care and support needs, unable to protect themselves. If a safeguarding response is not appropriate, staff can provide the adult with advice, guidance and support, and work with them to reduce the risk of abuse.

Preventative approaches may include:

* supporting adults to have more control over their lives, and to make decisions about how they live their life;
* providing a person-centred service;
* helping adults to recognise abusive situations and know how to keep themselves safe;
* supporting adults to be independent and resilient;
* helping adults to develop their own support networks and have positive relationships and friendships;
* providing information to adults about their rights and where to get help.

Groundwork also supports adults who do not fit the definition of an adult at risk but because of their circumstances may be at increased risk of abuse. Where this is the case Groundwork will seek to provide support, implement preventative measures and refer to specialist agencies if necessary.

**SAFEGUARDING FLOWCHART**

Actions for staff members

Actions for Designated Safeguarding Lead

Review safeguarding incidents and procedures at quarterly Safeguarding Meeting

Add information to the Safeguarding Report Form completed by the staff member and store securely

If no, decide on other appropriate actions e.g. specialist support

If yes, contact the Police or Child or Adult Social Care Team and follow up in writing within 48 hours

Decide if a referral is required to Child Protection or Adult Safeguarding Authorities

Complete a Safeguarding Report Form and pass securely to the Designated Safeguarding Lead

Disclosure made or concern raised about a child or young person or vulnerable adult

Contact the Designated Safeguarding Lead without delay

**12.0 MANAGING ALLEGATIONS AGAINST STAFF AND VOLUNTEERS**

Allegations against staff must be taken seriously and the following process will enable Groundwork Greater Manchester to approach any allegation in a consistent way and without prejudice.

This procedure aims to:

* + - Ensure that participants are protected following an allegation of abuse by a member of staff;
    - Ensure that there is a fair, consistent and robust response to any allegations made so that any risk posed to participants is managed effectively;
    - Facilitate an appropriate level of investigation into allegations;
    - Ensure that Groundwork Greater Manchester continues to fulfil its responsibilities towards members of staff;
    - Ensure that individuals are able to continue in their role if they have been subject to an allegation that is unfounded or malicious.

### Action to be taken if an allegation is made or concerns are raised:

The person to whom the allegation has been made or who has a concern should:

* + - Contact a Designated Safeguarding Lead as soon as possible and inform them of the allegation or concerns;
    - Make a written recording using the **Safeguarding Report Form (Appendix 1)**;
    - Pass any written information to a Designated Safeguarding Lead safely and securely and not keep any records for themselves.

On receiving an allegation or concern, the Designated Safeguarding Lead will:

* + - Inform the staff member’s line manager and Executive Director;
    - Inform the staff member and suspend them from work whilst an investigation is carried out – it should be noted that this is not an assumption of guilt;
    - Lead on the investigation with support from the Safeguarding Team;
    - Keep the Board safeguarding lead informed;
    - Keep and maintain any written records in line with the Recording and Information Sharing Guidelines.

The investigation may include:

* + - Informing the police if a criminal offence is alleged;
    - Informing the Local Authority Designated Officer (LADO);
    - Conducting an internal investigation and possible disciplinary action in line with the Disciplinary Policy.

The LADO will be contacted within 1 working day if:

* + - A staff member has behaved in a way that has harmed or may have harmed a child;
    - A staff member has committed a criminal offence in relation to a child;
    - A staff member has behaved towards children in a way that indicates they are unsuitable to work with children.

The Designated Safeguarding Lead will co-operate fully with the Police or LADO and take advice from them on the course of action to be taken in relation to the staff member’s employment and informing them of the details of the investigation. Advice will also be sought on how to inform the participants’ parents or carers, and who should do this.

### Once investigations are complete

If a staff member is found to have harmed a child or vulnerable adult or poses a risk of harm to a child or vulnerable adult; the Designated Safeguarding Lead will inform the Disclosure and Barring Service and the member of staff will be disciplined using Groundwork Greater Manchester disciplinary policies and this may result in dismissal.

If allegations are unfounded and it is appropriate for the member of staff to return to work, it is the responsibility of the individual’s line manager, with support from the Designated Safeguarding Lead as required, to ensure that they are properly integrated back into work.

Where an investigation establishes poor practice rather than abuse then the line manager will consider appropriate training and supervision and the Designated Safeguarding Lead will review general practice in relation to safeguarding.

The Designated Safeguarding Lead should feel empowered to speak to the Board Safeguarding Lead directly with any organisational safeguarding concerns, in particular, regarding any behaviours of senior managers within the organisation.

**13.0 CODE OF CONDUCT FOR STAFF**

Groundwork Greater Manchester delivers its work with participants in a variety of ways including drop-in sessions, project work, group work, training sessions, 1-1 mentoring and coaching. Our activities include a combination of face-to-face and remote delivery methods. This code of conduct is intended to provide guidance for staff on careful and thoughtful conduct, and is not intended to detract from the enriching experiences, which come from positive interaction within our activities and services. The code applies to all staff and volunteers, and those working on behalf of the Trust.

Safeguarding is everyone’s responsibility and has a twofold purpose of safeguarding participants from abuse and also protecting staff and volunteers from false allegations of abuse; if we protect participants we also protect ourselves.

### Staff should:

* + - Always be aware of the needs of participants, and be vigilant for any possible signs of abuse;
    - Never promise confidentiality. There are circumstances in which information may need to be passed on to others in order to safeguard a participant. Staff should refer to Section 14 Recording and information sharing guidelines for further information;
    - Always wear their ID badge when working on behalf of Groundwork Greater Manchester;
    - Ensure that contact with individual participants takes place as openly as possible. When working with young people, if privacy is needed, the door should be left partly open if possible and other staff present are informed of the reason and location of the individual contact;
    - Avoid accidental 1:1 situations when working with young people, for example, not using toilets specifically allocated for children;
    - If they have specific responsibility for working on a 1:1 basis (as outlined in their job description), ensure that their line manager is fully aware of their work programme and that appropriate support is available if required.;
    - If they are a line manager of those staff who have specific responsibility for working on a 1:1 basis; ensure that risk assessments are carried out for project activities and work locations and individual risk assessments completed for identified young people where appropriate, and that the staff member is fully supported through regular supervision.;
    - If they are trained to administer first aid, ensure whenever possible that when administering first aid for a young person this is done in the presence of another adult. However, in an emergency situation staff should not hesitate to administer first aid simply because another adult is not present;
    - Not have unnecessary physical contact with participants. There may be occasions where physical contact is unavoidable, such as providing reassurance, or for physical support. In these cases, physical contact should only take place with the consent of the participant and should be avoided if it would likely be misinterpreted by the participant, their parent or carer if a young person, or a casual observer;
    - Avoid transporting young people on their own or in their own vehicles if possible. Where this is judged to be the best or only form of transport available in the circumstances, it should only be carried out with the full knowledge and consent of the line manager, the participant and the parent or carer;
    - Not contact or meet with participants outside an organised activity;
    - Ensure that their personal relationships do not affect the participants around them if they are engaged in relationships with co-workers or other adults present;
    - Not give out their personal details to participants. Participants should be asked to contact the staff member through the office or the mobile phone or email address supplied to the staff member by Groundwork Greater Manchester
    - Not communicate with participants on social networking sites using the staff member’s personal pages. Social networking may be used if a project or group page is set up. Further guidelines can be found in the E-Safety Policy and Social Media Policy;
    - Follow best practice in terms of remote and digital engagement activities, ensuring professional boundaries and safe practice are maintained at all times (see E-Safety Policy and Guide to Remote Engagement Guidance for more information);
    - Report to their line manager immediately if they find that they are the subject of a participants’ affections or attentions;
    - Adopt and enforce a zero tolerance approach to harmful sexual behaviour, sexual harassment, and online sexual abuse;
    - Identify risks and agree how to handle everyday interactions with their line manager if they live and work in the same location. This is particularly important in the case of volunteers and apprentices who may have been recruited from within the communities they will be working in, and may require support to separate their personal lives from their professional responsibilities;
    - Remember that on rare occasions children and young people themselves can be responsible for abusing their peers, ensure that this risk is assessed during the planning of an activity, and that group ground rules are established in line with Acceptable Behaviour standards.

### Staff should never:

* + - Engage in sexually provocative or rough physical games with participants;
    - Threaten participants with serious sanctions or physical punishment;
    - Take participants to their home or the home of a relative or friend;
    - Share a room with a participant whilst on a trip or residential;
    - Allow participants to use inappropriate language unchallenged (e.g. racist, sexist or homophobic comments);
    - Make sexually suggestive comments in front of, about, or to a participant, even in fun;
    - Engage in a sexual relationship with a participant under the age of 18, as such sexual activity is an abuse of the position of trust as defined in the Sexual Offences Act;
    - Engage in a sexual relationship with an adult participant of Groundwork employment, education or training services;
    - Let allegations made by a participant go without being addressed and recorded;
    - Deter participants from making allegations through fear of not being believed;
    - Do things of a personal nature for a participant that they can do for themselves;
    - Rely on their good name to protect them i.e. everyone regardless of position should adhere to these guidelines.

These guidelines are not exhaustive and staff are encouraged to use their professional judgement in all circumstances in conjunction with this code. If staff are concerned about any situation in which they interact with participants, they should speak immediately to their line manager who will seek additional guidance from the Safeguarding Management Group if necessary.

Breaches of this code should be reported in the same way as an allegation made against a staff member as outlined in **Section 12**, and will be investigated in line with these procedures. If staff are concerned that breaches have not been dealt with appropriately by following these procedures, they should follow the Whistleblowing Procedure.

**Organisation culture: Zero tolerance on sexual harassment**

A 2021 Ofsted review concluded that sexual harassment, including online sexual abuse, has

become ‘normalised’ for children and young people although staff are not always aware. The report recommended that providers act on the assumption that sexual harassment is affecting their learners/ participants, and take a whole-provider approach to addressing these issues, creating a culture where sexual harassment is not tolerated.

We will create this culture by:

• Providing staff training and learning opportunities, to ensure staff awareness of current and emerging issues

• Ensuring that learners/ participants are supported to report concerns about sexual harassment and violence and online sexual abuse

* Ensuring that concerns are taken seriously and dealt with swiftly and appropriately, and learners/ participants are confident that this is the case

**14.0 RECORDING AND INFORMATION SHARING GUIDELINES**

Groundwork Greater Manchester recognises that information sharing is vital to safeguarding and promoting the welfare of participants. The following guidelines seek to support staff to record information, share it, understand its significance and then take appropriate action, in line with our Data Protection and Information Security Policies.

These guidelines are based on the seven golden rules about information sharing which are taken from Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015. This also contains a useful flowchart to assist staff when making decisions around information sharing.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

1. Remember that the Data Protection Act and human rights law are not barriers to information sharing.
2. Be open and honest.
3. Seek advice from other practitioners.
4. Share with informed consent.
5. Consider safety and well-being.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure.
7. Keep a record of your decision and the reasons for it.

### 14.1 Records

Groundwork Greater Manchester makes and keeps records relating to its work with participants to support us to comply with health and safety, contractual and funding requirements. Staff will inform participants when they start accessing our services that records will be kept. This may include personal information e.g. registration forms, consent forms; as well as records of their participation as an individual or member of a group e.g. 1-1 record, session record.

Records are also kept when there is a safeguarding concern or disclosure, using a Safeguarding Report Form. Records are clearly marked and kept securely by the Designated Safeguarding Lead in a confidential file. The records are reviewed annually by the Safeguarding Team and checked to be chronological, tidy, legible and factual in content. Records may be withdrawn from the organisation in compliance with requests made by the Local Authority Designated Team, NSPCC or Police Teams. Any withdrawal will be noted and signed for.

Where there is a concern that a participant may be in need, at risk of abuse, or pose a risk to other participants or staff, a note may be placed on other records along with details of how the concerns have been or are being dealt with. Programme managers should decide on how best to arrange this depending on the specific reporting requirements for that programme. This could include a separate note on file or a flagging system that alerts staff members to further information held in a specific location that must be checked prior to any contact with the participant.

When creating records, staff should make it clear if any part of the record is based on fact, hearsay or opinion. If opinion is expressed, this should be relevant to the situation, and respectful and appropriate in tone.

### 14.2 Storage of records

Staff will ensure that all records that contain personal information about participants will be kept securely. Written and portable electronic information will be stored in lockable cabinets, and information stored on hard disks and networks will be secured using passwords or other appropriate security measures. Information will not be left lying around on desks and will be secured out of office hours. Records relating to individuals will be kept separately from records relating to the work that is delivered. This is to ensure that confidentiality is maintained where information may have been recorded about an individuals’ circumstances.

Records will not be kept for longer than is necessary in accordance with the Data Protection Act and General Data Protection Regulations 2018. We will keep records for as long as a participant is accessing our services and until all requirements of our health & safety, contractual and funding obligations have been met. Records containing personal information about a participant will be destroyed securely.

### 14.3 Sharing Information

Groundwork Greater Manchester recognise that participants, and for young people their parents or carers, have a right to know the information they share with us will be regarded as confidential, as well as to be informed about the circumstances when and the reasons why we are obliged to share information.

We are obliged to share confidential information without authorisation from the person who provided it, or to whom it relates, if it is in the public interest. That is when:

* + - It is to prevent a crime from being committed or to intervene where one may have been, or to prevent harm to a child or adult; or
    - Not sharing it could be worse than the outcome of having shared it.

The decision to share information without consent should never be made as an individual, but with the back up of the Safeguarding team. The three critical criteria are:

* + - Where there is evidence that a participant is suffering, or at risk of suffering, significant harm.
    - Where there is reasonable cause to believe that a participant may be suffering, or is at risk of suffering significant harm.
    - To prevent significant harm arising to children and young people or adults, including the prevention, detection and prosecution of serious crime.

Staff will never promise confidentiality or to keep secrets, however, when we share information this will be done on a ‘need to know’ basis.

Staff will not discuss personal information given by participants, or if young people their parents or carers, with other members of staff, except where it affects planning for the participants’ needs.

Staff will seek consent to share information from participants and their parents or carers if young people in most cases (see exceptions above). Staff will do this in the following ways:

* + - Cover this verbally when the participant starts or include this in the information provided;
    - Participants and/or their parents or carers sign a Registration Form at registration to say they understand this;
    - Ask participants and/or their parents or carers to give written consent to share information about any additional needs they, their child or the person they care for may have;
    - Give copies to participants and/or their parents or carers of the forms they sign.

Staff will consider the following questions when they need to share information:

* + - Is there legitimate purpose to sharing the information?
    - Does the information enable the person to be identified?
    - Is the information confidential?
    - If the information is confidential, do we have consent to share?
    - Is there a statutory duty or court order requiring us to share the information?
    - If consent is refused, or there are good reasons not to seek consent, or is there sufficient public interest for us to share information?
    - If the decision is to share, are we sharing the right information in the right way?
    - Have we properly recorded our decision?

All of the undertakings above are subject to our paramount commitment to the safety and well-being of the child or young person or vulnerable adult.

Where information is shared, staff will record the reasons for doing so in the relevant file; where it is decided that information is not be to be shared staff will record this too.

### 14.4 Access to records

Participants have a right of access to records that are held about them by Groundwork Greater Manchester. Full access to records will be provided unless staff consider the participant to be of insufficient age and understanding or is deemed not to be competent (see notes below on rights and competency). Where another agency requests access to information about a participant this will only be provided with the full knowledge and consent of the participant (see exceptions above).

### 14.5 Policy breaches

Staff will support participants throughout any proceedings that follow the disclosure of confidential information, taking on board any requests made by the participant. Staff will give clear information to the participant and their parent or carer where necessary, about the reasons for and consequences of disclosing confidential information. Where confidential information is disclosed for reasons that are not covered in these procedures, disciplinary action may be considered.

### 14.6 Rights and Competency

### Children and Young People - The Gillick Principle

The Gillick case involved the provision of contraceptive treatment for girls under the age of 16. The House of Lords ruling (1985 3A 11 ER 402) had the effect of permitting doctors to provide medical treatment to children under the age of 16, without parental consent, where they were found by the doctor to be competent (Gillick competent). The decision as to whether or not a child is competent depends on a number of factors, including maturity of the child; the child’s understanding of the consequences of his/her actions etc.

Competence must be defined by the staff member involved on a case-by-case basis; it is not acceptable to have a general policy that defines the age at which children will be deemed competent. Where a child is not of sufficient understanding the consent of the parent (or person with parental responsibility) is required. Even if a child is considered to be Gillick competent, staff need to keep the issue of competence under constant review.

**Adults at Risk**

Adults have a general right to independence, choice and self-determination including control over information about themselves. In the context of adult safeguarding these rights can be overridden in certain circumstances which include emergency or life-threatening situations, if there is a safeguarding concern, or where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented.

An individual staff member cannot give a personal assurance of confidentiality. Staff should always report safeguarding concerns in line with the Safeguarding Policy.

It is good practice to try to gain the person’s consent to share information. As long as it does not increase risk, staff should inform the person if they need to share their information without consent.

**15.0 PREVENT DUTY**

As a provider of services to children, young people and adults, Groundwork Greater Manchester has a vital role to play in protecting them from the risks of extremism and radicalisation. This is a role which is underpinned by the Counter-Terrorism and Security Act 2015 ‘to have due regard to the need to prevent people from being drawn into terrorism’.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is defined by the Government in the Prevent Strategy as ‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas’.

Prevent is an integral part of Groundwork Greater Manchester commitment to safeguarding. We seek to protect children, young people and vulnerable adults against the messages of all violent extremism.

### 15.1 Recognising radicalisation and extremism

Children, young people and vulnerable adults are known to be at risk of others attempting to radicalise them. There are many reasons why a person might be drawn to extremism. These may include:

* + - Searching for answers to questions about their identity, faith and belonging;
    - Being drawn to a group or individual who can offer answers to these questions or provide a social network and support;
    - A lack of self-esteem;
    - A desire for adventure and excitement;
    - A need to promote their ‘street cred’;
    - Being influenced by world events by feeling a sense of grievance and wanting to make a difference.

Often it is vulnerable people who are targeted for radicalisation and can include those that:

* + - Have low self-esteem;
    - Feel isolated;
    - Experience pressure from peers;
    - Have a lack of direction or purpose;
    - Feel guilt, loss, isolation, anger or fear;
    - Have suffered a family breakdown.

Signs of radicalisation may include:

* + - Out of character changes in behaviour, peer interactions and dress;
    - Secretive behaviour;
    - Losing interest in peer groups and activities;
    - Showing sympathy for extremist causes;
    - Possessing extremist literature;
    - Glorifying violence;
    - Verbally expressing opinions different to generally accepted views or publicly supporting messages similar to those of illegal organisations.

There is no stereotype for people holding extremist views and the above are only examples or circumstances that can drive someone to terrorism but often the lead is a sense of injustice, which can be on a personal or more far reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda, through face-to-face interactions or online through the internet, social media and mobile phone applications.

More information about understanding and identifying radicalisation risks can be found here:

<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/understanding-and-identifying-radicalisation-risk-in-your-education-setting>

### 15.2 Risk Reduction

The Management Team, Board of Directors and the Safeguarding Management Group will undertake an annual self-assessment concerning the level of risk within the organisation and update the Prevent risk register and action plan to reduce any identified risks.

### 15.3 Procedure

Keeping children, young people and adults safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding from other risks, as outlined in Sections 10 and 11.

When any member of staff has concerns that anyone may be at risk of radicalisation or involvement in terrorism, they should report this to the Designated Safeguarding Lead and complete a **Safeguarding Report Form (Appendix 1).**

The Designated Safeguarding Lead will have responsibility for assessing whether the participant may be at risk of radicalisation, and where relevant, for referring the participant to the Police Prevent Team.

If a member of staff is verbalising views that are considered extremist and that have potential to influence participants and other staff or is displaying behaviour associated with radicalisation, a safeguarding concern should be raised without delay to the Designated Safeguarding Lead and a **Safeguarding Report Form (Appendix 1**) completed.

### 15.4 Promoting British Values

In addition to being alert to radicalisation and extremism, Groundwork Greater Manchester recognises that it has a role to play in promoting British Values. These values are:

* + - Democracy
    - The Rule of Law
    - Individual Liberty
    - Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith

We will do this by supporting the people we work with to:

* + - Understand themselves and develop self-esteem and self-confidence;
    - Respect one another;
    - Distinguish right from wrong and respect the law;
    - Accept responsibility for their behaviour;
    - Make a positive contribution to their community;
    - Understand and respect their own and others’ cultures;
    - Understand and respect the rights and responsibilities of freedom of speech;
    - Respect and participate in democracy.

**16.0 WORKING WITH DELIVERY PARTNERS**

### 16.1 Groundwork Greater Manchester Role as Lead Provider

In some areas of service delivery Groundwork Greater Manchester will undertake the role of supply chain manager for programmes or contracts. In these circumstances, the ongoing assurance of the activities of our delivery partners is a key priority in achieving our commitment to safeguarding children, young people or vulnerable adults.

### 16.2 Delivery partner management

Groundwork Greater Manchester will undertake the following key activities when engaging with delivery partners:

### 16.2.1 Due Diligence

Groundwork Greater Manchester requires any potential delivery partner wishing to deliver services for children, young people or vulnerable adults on our behalf to complete a Due Diligence assessment.

Key requirements outlined in the due diligence assessment include the following:

* + - Having an appropriate Safeguarding Policy and procedures for work with children and young people or vulnerable adults, which include procedures for responding to concerns or disclosures of abuse, and managing allegations of abuse, and which have been subject to recent review (within the previous 12 months)
    - Having organisational policies and procedures that cover the following core requirements:
  + Safe recruitment
  + Anti-Bullying
  + Codes of conduct/behaviour
  + E-safety
  + Whistleblowing
  + Health and Safety, and guidelines which cover safe delivery of services
  + Prevent
    - A named Safeguarding lead (along with contact details)
    - Confirmation of appropriate training and awareness-raising activities to ensure staff are competent and compliant

Delivery partners will not be awarded a contract or grant for delivering services for children and young people or vulnerable adults on behalf of Groundwork Greater Manchester until these requirements have been satisfied.

### 16.2.2 Policy and procedure spot checks

Delivery partners delivering services for participants on behalf of Groundwork Greater Manchester are subject to policy and procedure spot checks to ensure that these continue to meet the standards outlined above. The frequency of spot checks will depend on the type and duration of the activity and will be established by Groundwork Greater Manchester at the outset of each programme.

### 16.2.3 Performance review

As part of regular performance or progress reviews with delivery partners Groundwork Greater Manchester requires ongoing assurance that safeguarding policies and procedures are being followed and are translated into good practice. Performance reviews will take the form of written feedback and/or face-to-face meetings, and generally take place quarterly or twice-yearly dependant on the type and duration of activity. Actions for addressing any safeguarding concerns raised by the delivery partner or Groundwork Greater Manchester should be agreed by all parties.

### 16.2.4 Dealing with safeguarding concerns

If staff are made aware of any safeguarding concerns relating to a delivery partner, they should follow the procedures outlined in **Sections 10 and 11**, contact a Designated Safeguarding Lead and complete a **Safeguarding Report Form (Appendix 1**). The Designated Safeguarding Lead will contact the named Safeguarding Lead for the delivery partner to ensure that the appropriate agencies are contacted and the matter is dealt with to the satisfaction of Groundwork Greater Manchester in line with its Safeguarding policy and procedures.

**16.3 Groundwork as provider for another organisation**

Groundwork often provides services for young people, such as coaching and mentoring or training, for pupils or students of schools, colleges or other training providers. Services may have been commissioned by the educational establishment directly or indirectly through externally funded programmes; services may be delivered on or off the premises of the education establishment.

The relevant manager at Groundwork must agree the protocol for reporting safeguarding concerns and sharing information concerning pupils or students on school / college roll as an integral element of the partnership or funding agreement for the service. Groundwork would expect that the education establishment would assume the role of lead professional for any safeguarding concerns identified by Groundwork staff or volunteers and that Groundwork staff would report concerns directly to their identified DSL.

Within each agreement, Groundwork should ensure that the school / college safeguarding procedures are understood and name (s) and contact details for the DSL (s) are identified in the agreement and communicated to relevant Groundwork staff.

Groundwork staff will

* + - Ensure children and young people supported understand agreed safeguarding procedures as part of their activity induction
    - Report any safeguarding concerns to the named DSL and comply with relevant reporting and follow on procedures identified by the school / college DSL
    - Complete a safeguarding report for Groundwork DSL central record detailing actions taken to support future reference e.g. in serious case review

### 16.4 Groundwork Role in Child and Family Assessment (CAF)

Identified Groundwork staff may from time to time have a role to play within a CAF for individual children; however, it is not appropriate for Groundwork staff to fulfil the role of leading a CAF.

**17.0 RECRUITMENT OF STAFF & VOLUNTEERS**

### Safe Staff and Volunteer Recruitment Procedures

The Safeguarding Team will ensure that the Trust Safer Recruitment procedures are adhered to by all managers of staff and volunteers who will be working with children, young people or adults at risk, or who have access to confidential records relating to participants. All staff with responsibility for recruitment will receive training concerning Safer Recruitment Procedures.

1. For each new role to be recruited the senior manager leading the recruitment will be required to use the **Safer Recruitment Checklist (Appendix 5**) to plan and manage all stages of recruitment, with the completed checklist placed in personnel file for all new starters.
2. For each new role the Line Manager and DSL will agree whether a DBS check is required, as defined within the Policy on Recruitment of People with Criminal Convictions. These vetting requirements will be identified within the person specification and application form.
3. All new youth work and education roles must be recruited using a full application form, a CV is not sufficient on its own.
4. New staff will be recruited following open and transparent practises as defined in the Trust Recruitment and Selection Policy and Safer Recruitment Procedures
5. Relevant DBS check to be made prior to appointment or at induction. Full details of DBS process is detailed within the Policy on Recruitment of People with Criminal Convictions. All staff requiring an Enhanced DBS check will also be required to sign up to the update service.
6. Prior to appointment two references will be taken up, which include requesting information regarding safe practises and experience. Written references will routinely be furthered verified through follow up telephone calls.
7. A new recruit will not be confirmed in post until a satisfactory DBS check has been completed, and two satisfactory references have been received.
8. Where a DBS check has not been finalised prior to agreed start date, an individual will be able to commence employment with Groundwork following completion of a risk assessment specifying appropriate restrictions and supervision until consent received from DBS. If DBS check identifies prior conviction or concerns that prevents the individual from continuing with agreed job role their contract will be terminated with immediate effect.
9. All returned DBS will be checked by the DSL and they will inform individual’s line manager when a satisfactory DBS check has been received for them, to enable any restrictions or additional supervisory measures to be lifted. The Line Manager will formally confirm this in a documented 1:1 supervision meeting.
10. If a member of staff is recruited overseas, a DBS check may not provide a complete picture of any criminal record they may or may not hold. Applicants from overseas will be asked to get a criminal records check, or ‘Certificate of Good Character’, from their country of origin. We may also be able to get such a check through the relevant embassy in the UK but the applicant must give their permission. Processes for getting criminal records checks abroad vary between countries. For guidance on checking an individual’s criminal record please refer to the guidance detailed in the DBS overseas information service **(see Appendix 7)**.
11. Where a member of staff is engaged through an agency the Trust will need to ensure that all vetting procedures are in line with Groundwork practise.
12. All new staff have a standard probationary period as part of their contract of employment with the Trust, which in part will provide an opportunity for the Trust to ensure that a new recruit works according to the Trust’s safeguarding policy and procedure.
13. All essential records relating to staff recruited will be maintained on a Staff Single Register.

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**Employing Adults at Risk**

Where the Trust employs an adult at risk under a salaried contractual basis, either the standard recruitment practise/procedures should be adhered to or specific requirements of a funded / subsidised employment programme followed. It is the responsibility of the Trust to take extra care to ensure that an adult at risk, particularly someone with a learning disability, fully understands the requirements of the job and that when asked to sign a contract of employment they fully understand the implications of the document they are signing in terms of what is expected of them and the financial implications e.g. impact on any benefits they currently receive. If someone does not understand the document they are signing then they are unlikely to be bound by its contents. If appropriate, a carer or referrer should be asked to be present during any meeting to sign a contract.

**18.0 SAFE DELIVERY GUIDELINES: WORKING WITH CHILDREN AND YOUNG PEOPLE**

Groundwork Greater Manchester is committed to providing safe engagement, activities, visits and residentials for children and young people (participants). This commitment stems from our safeguarding responsibilities as well as our legal responsibilities. We recognise that participants may lack experience and awareness of risks, and may be immature.

Under the Children Act 1989, we have a duty of care to children taking part in our services. This has been interpreted as a duty to act as a careful parent would. This means that staff are under a duty to exercise adequate supervision, taking into account the age and maturity of the participants, and any disability they have.

Health and Safety law places us under a duty to provide a healthy and safe workplace for employees, and to make an assessment of the risks to the health and safety of persons who are not in our employment, but who take part in activities that we run. We are also under a duty to take reasonable care to ensure that a participant will be reasonably safe in any premises used for an activity that we deliver. The law makes it clear that any person responsible for children and young people must be prepared for them to be less careful than adults.

In order to meet these duties staff should follow these guidelines to ensure that they deliver safe engagement, activities and visits, whether these are provided as a one-off or on a regular basis.

### 18.1 Staffing

Groundwork Greater Manchester will ensure that all members of staff and volunteers who work with children and young people (participants) as their principle role have a job or task description that clearly sets out their level of responsibility in relation to those participants. The level of responsibility that a staff member or volunteer is given will be dependent on their qualifications, skills and experience.

Where the job description does not identify working with children and young people (participants) as their principle role, but where the member of staff has developed a project where they will have regular supervisory responsibility for participants, for example a community or practical conservation project, the decision for the project to go ahead should be taken by the Line Manager in consultation with the Safeguarding Team. The decision will be based upon competency, the nature of the work and most importantly the ability to safeguard the participants.

### 18.2 Registration

All participants who join our services will be required to complete a project specific registration form. Personal information including name, contact details, date of birth and an emergency contact name and number will be required at registration as a minimum, and staff should also collect additional information as required by the specific project or funder.

Some participants may be referred to us by another agency. In these cases, staff should ensure that a relevant referral form is completed and that the information provided is used to assist them in being able to meet the needs of the participant, inform the risk assessment process, and to establish from the outset who is responsible for a participant during their engagement with our services.

Information should be given to participants, and their parents or carers if necessary, at registration about safeguarding, information sharing, acceptable behaviour, and who to contact if they have any concerns about the service being provided.

### 18.3 Appointed person

In line with government guidance, all work undertaken with children and young people will have an appointed person. In the case of 1:1 coaching and mentoring this will be the member of staff assigned to the individual; for group activities, the appointed person is the group leader; and for all other events where vulnerable participants may attend, the appointed person will be the person in charge of organising the event. The appointed person will have overall responsibility for the ensuring that safe delivery guidelines are followed; the health, safety and welfare of the individual or group; ensuring that a copy of the Adventure Activities Licence is obtained if an activity is licensed and will be the main point of contact for staff members, participants, parents and carers.

When planning a trip the Appointed Person leading the group should ask themselves 10 basic questions:

1. What are the main objectives of the visit?
2. What is the “Plan B” if the main objectives cannot be achieved?
3. What could go wrong? Does the risk assessment cover the main activity; “Plan B” travel arrangements; emergency procedures; staff numbers, gender and skill mixes; generic and site specific hazards and risks (including for Plan B); variable hazards (including environmental and participants’ personal abilities and the “cut off” points)?
4. What information will be provided for parents?
5. What consents will be sought?
6. What opportunities will parents have to ask questions (including any arrangements for a parents’ meeting)?
7. What assurances are there of the leader(s) competencies?
8. What are the communication arrangements?
9. What are the arrangements for supervision, both during activities and ‘free time’ – is there a Code of Conduct?
10. What are the arrangements for monitoring and reviewing the visit?

More information can be found in the *DfE Good Practice Guide: Health and Safety on Educational Visits.* This is supplemented by further documents: *Standards for Adventure, A Handbook for Group Leaders and Group Safety at Water Margins*. All of these documents can be found on the DfE website and www.hse.gov.uk/services/education/school-trips.htm.

### 18.4 Insurance

Groundwork Greater Manchester will ensure that it holds appropriate insurance for all activities in which participants are engaged. The insurance policies are thoroughly checked to ensure that they cover all eventualities that may arise in an activity and our insurers are informed of all our activities.

The property of volunteers or clients are not covered by Groundwork’s property insurance. Staff should make volunteers and clients aware of this and draw their attention to the possible existence of cover in respect of their personal belongings as part of their own or their family’s household comprehensive contents insurance.

### 18.5 Risk assessment

A risk assessment should be carried out well in advance of any project, activity or visit. Its purpose is to assess possible risks that may arise and make plans to reduce them. Further information on risk assessments can be obtained from the Health and Safety Policy.

Staff should consider the following factors when assessing risk for group work, activities and events:

* + - The type of activity and the level at which it is being undertaken;
    - The location, routes and modes of transport;
    - The competence, experience and qualifications of supervisory staff;
    - The participants’ ages, competence, fitness and temperament as well as the suitability of the activity;
    - The ratio of competent and qualified staff to participants;
    - Individual behaviours and triggers, and their impact on other participants;
    - The quality and suitability of the equipment and whether it meets any national standards;
    - Seasonal weather conditions and timing;
    - The special educational or medical needs of the participants;
    - Emergency procedures;
    - How to cope when a participant becomes unable or unwilling to continue;
    - The need to monitor risks throughout.

If a residential activity is being planned, staff should follow agreed checklist to ensure that all aspects of the residential are planned safely. A project specific individual risk assessment should be completed for any identified participants who will be receiving 1:1 support through a coaching or mentoring service, or where additional risks have been highlighted for any participant taking part in a group activity. Assessment must take account of any risks to the individual, other participants or staff members, or any specific risks relating to the background of the participant. All sections of the Individual Risk Assessment should be completed including those where no additional risk has been identified.

### 18.6 Activity providers

When any part of an activity will be provided by an outside agency staff should always inquire of an activity provider whether they have a licence or are part of an Assured Member Scheme, prior to arranging the activity. Copies of licences, insurance details and risk assessments should also be obtained from the provider in advance of the activity, and should be used to inform the risk assessment process.

Commercial activity centres generally need by law to be licensed under the Activity Centres (Young Persons’ Safety) Act 1994 and the Adventure Activities Licensing Scheme 2004. Most centres offering outdoor activities will fall under this law. Staff should check <http://www.hse.gov.uk/aala/> for further information. The Learning Outside the Classroom quality mark and School Travel Forum are schemes that have been developed for providers of non-adventurous activities and educational visits, and their websites contain details of the schemes and lists of assured members. All licensed activity centres and tour operators who are part of an Assured Member scheme must demonstrate that they meet certain standards, and can operate in a manner that protects children from harm.

### 18.7 Staff to participant ratios

The NSPCC recommends the following minimum supervisory ratios for work with children and young people:

* + - 1 adult to 3 children aged under 5 years
    - 1 adult to 6 children aged 5 – 8 years
    - 1 adult to 8 children aged 9 - 12 years
    - 1 adult to 10 children aged 13 – 18 years

The minimum requirement is two members of staff for all work with groups of children and young people where staff are taking supervisory responsibility. These are guidelines for minimum requirements; however, the risk assessment may indicate that additional staff members are required to ensure safety and to meet the identified needs of the participants.

If parents are present, they must take responsibility for supervising their own children. Where a parent is present, that child will not be counted in determining how many staff are needed for supervisory duties.

Where staff are delivering open access or drop-in sessions, where children are free to come and go as they please, and where parental consent is not required, supervisory ratios can be modified. This should be as near as possible to the above ratios and agreed in advance with the Line Manager once risk assessment has taken place.

If staff are providing activities for schools and other organisations, those organisations must provide suitably qualified adults e.g. teachers, youth workers and play workers, who will take supervisory responsibility for the children and young people. Staff should ensure that a **Partner Agreement Form (Appendix 6)** is completed in advance of these activities.

### 18.8 Work with under 8’s

Staff should not take direct supervisory responsibility for under 8’s unless it is specified within their agreed job description and they have the relevant qualifications to allow them to work with under 8’s. If work is being carried out by these qualified workers they should adhere to the Department for Education National Standards for Under 8’s Day Care and Childminding.

If staff do not hold the relevant qualifications, the following guidelines apply:

Work with under 8’s should only take place if the parent or guardian of the child is present or where a partner agency takes responsibility for the under 8’s.

All publicity for activities and events must make it clear that under 8’s must be accompanied by a parent or guardian. Publicity should include the following statement: “Groundwork Greater Manchester cannot accept any supervisory responsibility for children under 8. Under 8’s must be accompanied by a parent or guardian who is over 18.”

On rare occasions, the letter of the law is impossible to apply and we have exceptionally agreed the following: If a child who is under 8 years old arrives at an event, staff may accept the child into the activity if they have attempted to contact the parent or guardian, they have been unsuccessful and have judged that it would be better for the welfare and safety of that child to remain at the event than to leave.

In this case, staff must -

* + - Attempt to catch the attention of the parent or guardian if staff see them leaving the site;
    - Ask the child if their parent or guardian knows where they are;
    - Take the child’s details;
    - Phone the parent or guardian if the child knows the number.

If staff are able to contact the parent or guardian, they should ask them to accompany the child for the duration of the activity or to come and collect the child immediately. If staff are unable to contact the parent or guardian, they can include the child in the activity that must be suitable for his or her age and ability. If staff have any concerns about the safety or welfare of the child, they should follow Safeguarding Procedures.

Staff should follow the Accident / Incident / Near Miss Report Procedure for all situations involving unaccompanied under 8’s. Where staff find that they are dealing with incidents of unaccompanied under 8’s on a regular basis they should seek to work with a partner agency who is able to take supervisory responsibility for under 8’s for all future events.

### 18.9 Acceptable Behaviour

Groundwork Greater Manchester sets out the following acceptable behaviour standards for participants and guidelines for staff on dealing with issues:

**18.9.1 Bullying** – bullying will not be tolerated and will always be challenged by staff. The Anti-Bullying Policy and Procedure provides further details on preventing and dealing with bullying.

**18.9.2 Fighting** – fighting is unacceptable and staff will always ensure the safety of vulnerable participants when a fight has occurred. Staff may call the Police if a serious physical assault has taken place.

**18.9.3 Alcohol** – alcohol should not be consumed by anyone under the age of 18 during our activities. If staff know or suspect that a participant has been drinking before turning up to an activity, they will prevent them from taking part if they assess that it is not safe for the person to participate. Where an agreement is made with participants that alcohol must not be brought on an activity, staff may confiscate alcohol and dispose of it if it is found.

**18.9.4 Drugs** – illegal drugs including new psychoactive substances (NPS) must not be used or supplied on our premises or during our activities. If staff know or suspect that a participant is under the influence of any substance, including prescribed drugs, they will prevent them from taking part if they assess that it is not safe for the person to participate. If illegal drugs are found during an activity, staff may confiscate them, will seek advice from drug agencies on the most appropriate method of disposal, and the Police may be informed.

**18.9.5 Smoking** – smoking or vaping is not permitted in our buildings orvehicles.. Staff will agree with participants when and where they can smoke / vape during activities. Participants will also be expected to follow any rules at any buildings or sites that they visit during an activity.

**18.9.6 Weapons** – weapons must not be brought to any of our buildings, sites or activities. Staff will always ask a participant to leave if they are known or suspected to be carrying a weapon, or if a participant uses an item of equipment as a weapon during an activity. If a participant refuses to leave staff may call the Police.

**18.9.7 Information Technology and Online Behaviour –** participants will be supported and encouraged to keep themselves safe and respect others when using ICT or spending time online. This applies whether they are using their own, Groundwork Greater Manchester, or third party equipment or internet access.

**18.9.8 Sexual activity** – it is not part of staff members’ responsibilities to intervene if participants are engaged in sexual relationships. However, the age of consent is 16, and staff will report to the Designated Safeguarding Lead if they are concerned that someone has not given genuine consent to sexual activity, or is under 13.

**18.9.9 Criminal offences** – if a participant has committed and been charged with a criminal offence staff will always ensure the safety of other participants in deciding whether it is safe for the participant to continue accessing our services.

**18.9.10 Absconding** – if a participant leaves an activity early or without telling a member of staff, staff will always contact the parent or carer, and may contact the Police if they are concerned for the participant’s safety and welfare.

These are the minimum that should apply to all work with participants and should be discussed with the participants, along with any additional rules required for the specific project, activity or trip, and what action will be taken if rules are broken. Staff should also let parents or carers know the rules that will apply. If rules are not made clear, staff, participants and their parents or carers may have very different expectations that can lead to disputes and potentially to participants being exposed to a risk of harm.

Staff should not use force or restrain a participant, and must not search a participant or their belongings. Further information on dealing with difficult situations and conflict can be found in Staff Guidelines for Dealing with Conflict.

If acceptable behaviour standards are not followed, and there are any concerns about safeguarding, staff should follow the Safeguarding Policy and Procedures. Where bullying occurs, staff should follow the Anti-Bullying Policy and Procedure. Where any other rules are broken, staff should inform the appointed person, who should talk to all those involved in the incident individually. Having heard all the evidence a decision should be made by the appointed person about what, if any action should be taken, and whether to inform parents or carers and/or the Police. Staff should use their professional judgement in all cases and make an informed decision based on the circumstances, guidelines relating to safeguarding and information sharing, the needs and wishes of the participants, and whether informing parents or carers has been agreed as a sanction prior to the activity. Participants should only be sent home where there is a clear breach of the rules that places that participant or another at risk of harm.

Where a participant is asked to leave an activity or event, the appointed person should notify their parent or carer. If it is not possible to contact the parent or carer, and the participant is aged 16 or over, he or she can be asked to leave immediately, provided that the appointed person is satisfied that the participant is able to get home safely. Those aged under 16 will need to remain with staff until their parent comes to collect them or arrangements are made and agreed with the parent for them to get home safely.

Where a participant is asked to leave an activity away from base, the appointed person will need to be sure that there is adequate transport, that the participant is safe to travel on his or her own on such transport and, if the activity has been a residential trip, that there is somebody at home to receive the participant. It may be that a staff member will need to accompany the participant home. The appointed person should contact the team/project leader to discuss the situation prior to sending the participant home.

Staff should follow the Accident / Incident / Near Miss Report Procedure in all cases where a participant has been sent home.

### 18.10 Pre-activity briefing

Participants and their parents or carers should be given written details before an activity, trip or a residential trip where Groundwork staff are taking direct supervisory responsibility. The information provided may include:

* + - Dates, times and location of the visit (including address and telephone number);
    - The programme including any ‘free-time’;
    - Travel and accommodation arrangements;
    - Staffing;
    - Behaviour expected of participants;
    - Procedures for participants who become ill;
    - Special clothing or equipment and money to be taken;
    - Insurance;
    - Details of the ‘buddy’ system;
    - Contact numbers for the appointed person, other staff involved and the buddy staff member at base.

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### 18.11 Consent

Staff should obtain written consent from a parent or guardian for anyone under the age of 18 to participate in an organised activity, trip or residential. A consent form must be completed for each young person and received by the appointed person in advance. The appointed person should ensure that he or she has all the consent forms with them for the duration of the activity.

The parent or guardian is asked to provide:

* + - The home telephone number and address;
    - An alternative telephone number and address for emergencies;
    - The name and contact address of the young person’s GP;
    - Consent to medical treatment in emergencies, where it has not been possible to contact them;
    - Information on whether their child requires any extra help to participate, has any health conditions, suffers from allergies, is taking medication, any special dietary requirements, or has any behavioural issues that staff need to be aware of.

Depending on the nature of the activity, the parent or guardian should also be asked to provide information on whether their child:

* + - Has had, or been in contact with any contagious or infectious diseases within the previous four weeks;
    - Has had any other recent illnesses or suffer from any other medical problems;
    - Have any toileting difficulties;
    - Have any sleep difficulties (e.g. sleepwalking);
    - Suffers from travel sickness;
    - Can swim and the level of swimming ability;
    - May not participate in certain activities;
    - Have any special religious or cultural requirements.

Staff should add sections to the Consent Form if any additional information is required.

Staff should ensure that the following wording is used where consent is given to participate in general group activities over a period of time; where over 18’s are participating in adventurous activities; or where staff are required to sign disclaimers on arrival at activities.

***Consent for general activities -*** where participants are members of groups which meet regularly, a general consent form may be used which covers a period of no more than 6 months. The following information should be added at the top of the consent form in place of activity, location and date details:

This form covers the period from *\*insert date* to *\*insert date* (inclusive). Activities covered by this form are: Bowling, Cinema, Theatre, Eating-out, Ice-skating, Laser Quest, Meetings (e.g. at Groundwork offices, community centres, youth centres), Visits to places of interest (e.g. museums, outdoor artwork), Workshops (e.g. issue based, art), and Football games (indoor and outdoor).

***Consent for over 18’s -*** where participants are aged 18 or over the following paragraph should be used in place of the standard consent wording:

I confirm that I am aged 18 or over and can sign for myself to participate in the activities listed above with Groundwork Greater Manchester at the above location and on the above date. I give my full permission to Groundwork Greater Manchester to consent to any necessary medical treatment for myself in the event of an emergency.

I have read the rules supplied by Groundwork Greater Manchester. I agree to the rules and recognise that in the event that I break the rules, I may be asked to leave the activity or trip. In the event that I am asked to leave, any payment made for the activity or trip will not be refunded.

I give my consent for photographs and video images to be taken of me whilst engaged in the listed activities with Groundwork Greater Manchester and for these to be used for publicity purposes, including on the internet.

***Consent where activity providers need a disclaimer need to be signed -*** where staff will need to sign a disclaimer for under 18’s on arrival at an activity venue the following paragraph should be inserted at the top of the form in addition to the activity, location and date details: **Please note that this activity will require Groundwork Greater Manchester staff to sign a disclaimer on your behalf at the activity venue to enable your son/daughter to take part in the activity.**

The following paragraph should be used in place of the standard consent wording:

I, ......................................................., the parent / guardian / carer of ……………………………. give my consent to his/her participation in the above-named activity with Groundwork Greater Manchester at the above location on the above date. I give my permission for Groundwork Greater Manchester staff to sign a disclaimer on my behalf at the activity venue to enable the above-named participant to take part in this activity. I give my full permission to Groundwork Greater Manchester to consent to any necessary medical treatment for the above-named participant in the event of an emergency.

I have read the rules supplied by Groundwork Greater Manchester and have discussed these with the above-named participant. We both agree to the rules and recognise that in the event that he/she breaks the rules, he/she may be asked to leave the activity or trip. In the event that he/she is asked to leave, any payment made for the activity or trip will not be refunded. I have spoken to the above-named participant and we both give consent for photographs and video images to be taken of them whilst engaged in the listed activities with Groundwork Greater Manchester and for these to be used for publicity purposes, including on the internet.

***Consent for residential trips -*** where participants will be taking part in a residential trip, all activities that are part of the residential experience should be listed at the top of the consent form.

The following exceptional circumstances apply when seeking consent:

* + - A young person aged 16 is able to decide where they should live, can obtain their own passport, travel abroad without parental consent, and give consent to their own medical treatment. If the young person is living independently then he or she should sign the consent form. Staff should ensure that the young person is fully aware of the activity and understands the risks associated with taking part in the activity. Where the young person is still living with his or her parents, staff should seek parental consent.
    - If the young person is living with a carer or a friend, their consent will be accepted.
    - Where a child or young person splits his or her time between two parents, the consent of either one will be sufficient.
    - Where a child or young person arrives at an activity or pick up point without a completed consent form having been received in advance, staff must attempt to contact the parent or guardian. If contact is made staff should ask the parent or guardian to come to their location and complete a consent form. If this is not practical, staff may take the details required on the consent form, and gain verbal consent from the parent or guardian over the phone. Staff must state on the consent form that verbal consent was given, then sign and date the form. Following the activity, staff should arrange for the parent or guardian to sign the consent form. Verbal consent must only be taken in exceptional circumstances and must not be used on a regular basis. If staff are unable to contact the parent or guardian they may decide to include the child in the activity, if they have judged that it would be better for the welfare and safety of that child to remain at the activity than to leave, and the activity is suitable for his or her age and ability. Staff should follow the Incident Report Procedure for all situations regarding children without consent.

When running regular drop-in activities with children and young people aged under-18, in buildings and on public open spaces, staff should obtain the name and emergency contact details for all participants using a drop in registration form**.**

When running one-off open-access events there is no requirement to register participants or gain consent, unless information is required for monitoring purposes. However, staff should decide through the risk assessment process if there are any activities being provided which pose a risk to vulnerable participants. If this is the case, vulnerable participants should only be allowed to participate in those activities if they are supervised by a parent, guardian or carer. On-site publicity for these events should make it clear that staff will not take supervisory responsibility.

When working with vulnerable adults’ staff must satisfy themselves that the individual is fully aware of the activity and understands the risks associated with taking part in the activity. If this is not the case, staff should seek to discuss the activity with the carer.

Where participants aged over 18 attend activities and bring their child with them, staff must not take supervisory responsibility for the child. Staff must make it clear to the participant that the activity is not suitable for children and that the participant must take responsibility for their child at all times.

### 18.12 Safe handling and administering of medication

Staff should not hand out non-prescribed medication to participants. This includes but is not limited to paracetamol, ibuprofen, aspirin and allergy tablets. Participants and their parents or carers should be advised that they would need to bring and look after their own, non-prescribed medication when engaging in our services or activities.

Where participants need to take prescribed medication whilst engaging in our services or activities the following guidelines apply:

Participants should be responsible for looking after and administering their own prescribed medication whilst attending activities. If the participant is unable to self-administer, staff should make arrangements with the parent or carer to attend at the appropriate times to administer the medication. Staff should not take responsibility for or administer medication. Participants should be advised to carry prescribed medication in its original packaging.

Where participants need to take emergency medication whilst engaging in our services or activities the following guidelines apply:

Where staff are aware that a participant may require medication in an emergency such as an allergic reaction or a seizure, they should inform the appointed person. The appointed person should meet with the parent or carer in advance to obtain further details and instructions, and complete a medication form. If participants carry such medication, this must be carried on their person at all times. All staff who will be working with the participant must be made aware of what medication is carried, where it is carried, and be given instructions on how to administer it in an emergency.

Where participants have an allergy, the following guidelines apply:

Where staff are aware that a participant has an allergy, they should inform the appointed person. The appointed person should arrange to meet with the parent or carer in advance to obtain further details and instructions, and complete an allergy assessment and medication form.The completed forms should be used to inform the risk assessment for the activity and any precautions required communicated to staff, other participants and activity, accommodation or catering providers. Participants, parents and carers should be informed that Groundwork Greater Manchester could not guarantee that a participant will not encounter an allergen during an activity.

In all cases, if staff are concerned about a participant who has taken medication, who has missed a dose of medication, or they suspect that a participant may have exceeded the stated dose of medication, they should contact emergency services immediately.

### 18.13 Personal Care

Staff should not provide support to participants for personal care needs. If staff are made aware in advance of an activity, arrangements should be made with the parent or carer for personal care to be provided for the duration of the activity. Where staff are made aware that a participant requires support during an activity that was not highlighted in advance, they should contact the parent or carer and ask them to attend to provide the personal care. If this is not possible, staff may need to assist in order to preserve the dignity and welfare of the participant. Where this occurs, staff should follow the Accident Incident Report Procedure.

### 18.14 Duty Manager System for off-site activities and events

The appointed person should liaise with the relevant Duty Manager to act as the home contact during off-site activities and events. The home contact should be given full details of the activity or event and the staff members involved. Where staff are taking direct supervisory responsibility for vulnerable participants, the home contact should also be given emergency contact details for all staff and participants involved in the activity. The home contact must remain available for the duration of the activity or event in case of an emergency or if additional support is required. The appointed person should inform the home contact when the activity or event is completed safely.

Where staff are taking direct supervisory responsibility for vulnerable participants they should also pair each participant with a buddy and remind participants at appropriate points to check that their buddy is present.

If a participant goes missing from an activity staff should follow these guidelines:

* + - Inform the appointed person that a participant has gone missing;
    - Ensure that the remainder of the group are adequately supervised and remain in one location;
    - Organise and conduct a search of the venue;
    - If the participant has not been found during the search of the venue, the appointed person should contact the parent or guardian to check if the participant has returned home, or been in contact with them;
    - If the participant is still missing staff should conduct a search of the area around the venue;
    - If the participant has not been found, staff should contact the Police, and inform the home contact who should follow the guidelines below on dealing with incidents.
    - If a participant is seen running away from an activity, staff should generally not pursue the participant. In this case staff should note where they last saw the participant and in which direction the participant was heading, and should inform the appointed person immediately. The appointed person should then contact the parent or guardian and if necessary, the Police. If staff are concerned that the participant is particularly vulnerable, they may decide to follow them but should not run after the participant or behave in a way that the participant might perceive as being threatening.
    - If a participant is known to be liable to run away from activities, a plan should be agreed as part of the risk assessment process to limit the likelihood of this happening.

In all cases where a participant has gone missing from an activity, staff should follow the accident / incident / near miss report procedure.

### 18.15 First Aid

Staff should make an assessment of first aid needs taking into account the activities to be carried out. The law requires that first aid provision should be adequate and appropriate in the circumstances. If the activities taking place are such that a qualified first aider is not necessary, the minimum requirement is that a person should be appointed to take charge of the first aid arrangements, look after the equipment and facilities and calling emergency services when needed. For off-site activities, events and residential activities, at least one member of staff should be competent in first aid, holding a valid first aid certificate.

For all activities, the appointed person should make sure:

* + - a first aid box is available and it has been checked to ensure it contains the correct items;
    - all staff know how to contact the emergency services;
    - all staff know where the nearest accident and emergency unit is situated.

Staff should only administer first aid in the presence of an adult witness, however in an emergency the absence of an adult witness should not prevent first aid being given. If first aid is administered, staff should follow the Accident Incident Report Procedure.

### 18.6 Transport

Staff should ensure that transport arrangements are considered when planning for safe delivery. Where possible participants should be encouraged to make their own way to venues. If transport is being provided by Groundwork, staff should arrange an agreed location for pick up and drop off of participants, and ensure that parents and carers have full details of the location and times. Parents and carers should be made aware that it is their responsibility to ensure that the participant arrives at or is picked up from the agreed location on time.

Staff should avoid transporting participants on their own or in their own vehicles. Other transport options such as public transport and taxis should always be considered first. Where this is judged to be the only option staff should only transport vulnerable participants with the full knowledge and consent of their line manager, the participant, and their parent or carer.

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**18.16 Accidents, incidents and near misses**

**18.16.1 Reporting accidents, incidents and near misses**

Staff must record all accidents, incidents and near misses using the Accident or Near Miss Report Forms. Further information can be found in the Health and Safety Policy.

### 18.16.2 Responding to accidents, incidents and near misses

In the event of an accident happening, and a participant or staff member being injured or requiring medical treatment at a hospital, the following procedure should be followed:

* + - Ensure that all participants and staff are safe from further danger;
    - Contact the emergency services to provide rescue, medical care and/or hospitalisation for those who are injured or missing;
    - Provide the medical facility with the consent form. The parents should be contacted if possible before medical treatment is given, despite the fact that they have signed a consent form. In an emergency, medical treatment can be provided without consent;
    - Decide if further action needs to be taken;
    - Check that everyone is ok, participants may be feeling scared, upset or concerned for their own safety;
    - Inform your home contact as soon as possible;
    - Complete an Accident / Incident / Near Miss Report Form.

The home contact, if phoned with news of an incident or accident, should listen carefully and write down:

* + - The name, telephone number and location of the caller;
    - The location, time and nature of the incident;
    - The names of the individuals involved and the condition and location of any injured;
    - The details of any assistance required.

Then contact the senior manager, explaining the situation, and if unavailable contact the Executive Director.

In the event of a serious incident, accident, or in the case of a fatality, staff should follow the Crisis Management Plan and not try to deal with this without support.

* + - Contact the Executive Director;
    - Retain all equipment involved in an unaltered state;
    - Ensure that any participant who is interviewed by the police is appropriately supported and accompanied;
    - Make a written record of your recollection of what happened.

### 18.17 Closing sessions in an emergency

In exceptional circumstances, engagement, activities or visits may need to be cancelled at very short notice due to an unexpected emergency. Such incidents may include, but are not limited to, serious weather conditions, fire or bomb scare, serious accident or illness.

In such circumstances, staff will ensure that all steps are taken to keep both the participants and themselves safe. All staff and participants should assemble at a pre-arranged venue, where a register will be taken. The staff member should contact their line manager and make a decision as to whether the session should be closed early. Staff should then take steps to inform parents or carers and to take the necessary actions in relation to the cause of the closure. All vulnerable participants should be supervised until they are safely collected, or arrangements made and agreed with parents or carers for them to get home safely.

Staff should follow the Near Miss report form in all cases where sessions have been closed in an emergency.

### 18.18 Photographs

Staff should ensure that those participating in activities are made aware of when photographs or videos will be taken, what these may be used for, and when they may be used. Participants have the right to decline having their photograph taken or their image recorded on video.

At public events staff should ensure that the following information is displayed with names and numbers for participants to contact should they require further information. “Photographs and video images may be taken at this event for publicity purposes. If you do not wish your photograph or image to be taken please contact a member of Groundwork Greater Manchester staff on site”.

Staff members and any third party authorised to take photographs or video images should also ask individuals if they are happy for their image to be recorded prior to taking images where individuals can be easily identified.

Camera equipment and computer equipment is provided for staff where needed. Staff should not use their own cameras, mobile phones or other mobile technology to take photographs or videos and should not download images on to personal computer equipment.

Staff should obtain written consent from a participant, and where appropriate their parent or carer, to use photographs of vulnerable participants for any promotional or external purposes using standard photographic / video consent form... The written consent should be held for as long as the image is in circulation.

Participants aged 14 or over may give their own written consent for the use of photographs and images, but staff should ensure that the participant understands the implications of giving this consent. If staff have any doubts, the parent or carer should be asked to give their written consent in addition.

Staff should ensure that photographs and video images of participants are kept in a secure location.

Staff should aim to ensure that these procedures are followed when photographs or video images are used in the media. However, participants and their parent or carer should be made aware that we cannot prevent media companies from contravening these procedures. Staff should check the identity of anyone taking photographs or carrying out interviews at events prior to giving them permission to do so, and should be present when members of the media are interviewing and/or taking photographs or video images of participants engaged in our activities.

Photographs of participants should only be distributed to external persons/agencies after consideration has been given to the suitability of the person/agency, and once written consent has been obtained as detailed above. Specific requests for and any distribution of photographs involving participants by external persons/agencies should be noted on the project file.

If staff suspect that photographs of participants are being misused by another member of staff or by a person who is not employed by the Trust, they should report this to the Designated Safeguarding Lead who will deal with this in line with the Safeguarding Policy.

### 18.19 Evaluation, de-brief and supervision

Work with children and young people can be demanding as well as rewarding. Staff should ensure that they keep records of their work with participants using project specific recording methods. This information should be used to evaluate work regularly to ensure that it is being delivered safely.

All members of staff who work with children and young people will have access to regular 1-1 supervision with their line manager. Supervision is essential in ensuring that staff are supported in implementing safeguarding guidelines within their day-to-day work. Staff should also participate in team meetings where they can de-brief, share experiences, learn from others and get support.

**19.0 SAFE DELIVERY GUIDELINES: ADULTS**

**19.1 Risk Assessment**

A risk assessment should always be undertaken where a project is going to be working with or alongside vulnerable adults, in line with standard Trust risk assessment procedures detailed in the Health and Safety Policy. This should be undertaken in consultation with staff that directly support groups of service users, as they have the most relevant knowledge.

Some service users may have specific needs or disabilities that require special consideration or adaptations and in some cases an individual risk assessment may need to be completed. Where tasks involve use of tools or machinery any risk assessment needs to take particular consideration of the level of skill and competence of the adults involved in any activity and the style of training provided.

**19.2 Awareness of needs**

It is important that all staff within the Trust have a sound knowledge of the needs of any vulnerable adults they are working with. Where possible staff should use a formal referral process for engaging new clients, including asking the referrer to complete a referral form that provides information to ensure Groundwork staff understand an individual’s particular needs.

Sharing of information concerning the needs of a particular individual with other staff or volunteers should be addressed on a ‘need to know’ basis and must be done without breaching the service user’s right to confidentiality.

**19.3 Supervision Arrangements**

* + - Careful consideration needs to be made when planning activities and events targeted at specific groups of vulnerable adults of the level of supervision and support to be offered. This will include making an assessment of whether the activity must involve a minimum of two members of staff to ensure that an activity is delivered safely and effectively.
    - If a carer accompanies a vulnerable adult for a project or activity, it should be agreed that the carer shall take responsibility for supervising the adult they are accompanying.
    - If a vulnerable adult is brought to a one-off fun-day or event by a carer, parent or social worker, the adult should not be left in the care of Trust staff unless staff have formally agreed to this arrangement.
    - If other organisations are working with Groundwork staff to deliver a specific activity targeted at adults at risk, they must provide adults who are suitably trained and DBS-registered to supervise the activity.
    - Ensure that meeting places are safe and that times for the start and finish of an activity are clear to participants and their parents / carers.

**19.4 Consideration of group dynamics**

In deciding whether to accept a referral for a particular activity or course, consideration will have to be given to the dynamics of the group and how a service user with particular needs will fit into this group. If, for example, a referral is made in relation to an adult who exhibits inappropriate sexualised behaviour, the Trust will have to consider whether it will be wise, and indeed safe, to have such an individual involved in a project.

**19.5 Administering medication**

If a service user requires assistance in taking any medication throughout the day, unless staff have been appropriately trained and are able to administer medication, then the individual’s carer must accompany them for the activity, or be able to drop in during the day to administer the medication. If it is agreed that nominated staff can support an individual to administer medication, full instruction and written consent must be produced, signed, and held by Groundwork for ongoing reference.

**19.6 Codes of Behaviour**

All individual service users will be required to follow common boundaries and rules of behaviour on any Groundwork projects and activities, and the same sanctions will apply for any breaches of the policy so far as this does not breach anti-discrimination legislation.

Groundwork staff leading any activities or events must ensure that all participants fully understand the rules and codes of behaviour that are expected of them. Staff must adapt induction sessions and guidance material as appropriate to enable full understanding to be achieved, and reinforce information provided appropriately.

**19.7 Appropriate Staff Conduct**

All staff must ensure the boundaries of a professional caring relationship are clearly understood and maintained at all times.

It is not appropriate for staff to socialise with service users they are supporting; if a member of staff sees someone in their own time they must be careful to retain a professional boundary. We do however recognise that, for example through family connections, there may be incidences where a member of staff knows the person in a social capacity. In these circumstances you would need to make it clear to the service user that whilst you are in work mode they would have to interact with you as a professional in the same manner as other service users. You must also advise your line manager of circumstances where you are working with service users that you know in a social capacity, using ‘Service User – Prior Contact’ form.

Staff must never interact with service users on social media through their own profile; interaction on social media e.g. Facebook or Twitter between Groundwork and service users to support service delivery should only be through approved Groundwork group social media accounts. If a service user makes a ‘friend’ or ‘follower’ request to a member of staff through social media this must be declined and notified to their line manager.

Staff must consider how they compose messages sent to service users through text, email etc. through the normal course of their work. Messages must be accessible, appropriate and professional at all times and not provide potential for allegations to be made if taken out of context.

For more information concerning use of social media please refer to Groundwork E: Safety and Social Media Policies.

In the majority of cases, staff should avoid physical contact with service users they are supporting. We do however recognise that there will be incidences where a policy of non-contact is not practical. To ensure that any action carried out is not seen as inappropriate, or interpreted as sexual contact, all workers must consider the following aspects carefully:

* + - Their relationship with the group
    - Their relationship with the individual
    - The particular circumstances
    - Non-verbal messages (e.g. body language) they are receiving in response to actions
    - Whether there are other people present, particularly other adults

Similarly, any physical contact that a service user may initiate towards staff will be carefully judged for appropriateness and where needed the service user will be reminded of boundaries.

**19.8 Anti Bullying Procedures**

It is the policy of Groundwork that any form of bullying or aggressive behaviour will not be tolerated and workers must challenge this behaviour immediately. If workers encounter problems where bullying behaviour continues they should take steps to suspend or exclude an individual from participating in sessions, in line with individual project procedures. Groundwork’s policy relating to preventing bullying and harassment must be clearly communicated when setting project ground rules.

Some examples of where bullying or aggressive behaviour should be tackled are:

* + - Name calling – either directly, about another person or their family must be challenged immediately by workers
    - Derogatory behaviour must be challenged immediately by workers - with particular awareness of any sexist or racist undertones
    - Any sign of physical aggression must be stopped immediately by workers, even play fighting as this can be a bullying tactic or may escalate rapidly into a more serious incident. Workers should initially try to address unacceptable physical contact verbally. If the individuals do not respond workers should use blocking tactics to separate people, always vocalising their actions before intervening to prevent any interpretation of aggression.

**19.9 Delivering services for young adults with additional vulnerability**

Groundwork provide services for some young adults, particularly within employment, enterprise, skills and training provision who, although not vulnerable adults, have additional vulnerability due to inexperience or current circumstances such as involvement with the criminal justice system, impact of childhood trauma, experience of homelessness or time spent in local authority care.

Staff should provide due consideration in the planning and delivery of services to ensure that appropriate measures are taken to safeguard individuals whilst taking part in Groundwork activities and for the services they refer participant’s to. Key considerations are:

* + - Ensuring that organisations, such as Leaving Care Team’s or probation services make referrals using a fully completed referral form to support proper risk assessment. Follow up referrals directly with referrer to assess whether additional information is required for Groundwork to plan and prepare provision. For example, if our provision involves group work to understand any potential conflict between participant’s or behaviour triggers; specific mental wellbeing concerns and access to mental health services; patterns of alcohol or substance misuse issues.
    - Ensuring that participant’s complete initial registration form supported by initial assessment of needs, including clarification concerning mental wellbeing, prescribed medication and potential side effects, current support services accessing and history of alcohol or substance misuse.
    - For participants currently supervised by probation services, verify information provided concerning licence conditions that could impact on services offered by Groundwork e.g. curfew, electronic tag, exclusion zones, conditions of community order and any restrictions relating to associates.
    - Ensuring that an individual risk assessment is produced for participants where additional risks or needs are identified and use to plan activities and additional support.
    - Plan regular 121 support sessions with participants to assess and monitor their progress and adapt support as required.
    - Consider appropriateness of support or progression opportunities that we refer to. Complete work placement assessment form, for any placement we make referral to, ensuring that employer is able to provide both a safe working environment and appropriate support to meet needs of younger, inexperienced workers.
    - Staff should ensure that they keep records of their work with participants using project specific recording methods. This information should be used to evaluate work regularly to ensure that it is being delivered safely. All members of staff who work with adults with additional vulnerability will have access to regular 1-1 supervision with their line manager. Supervision is essential in ensuring that staff are supported in implementing safeguarding guidelines within their day-to-day work. Staff should also participate in team meetings where they can de-brief, share experiences, learn from others and get support.

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# 20.0 OTHER POLICIES AND PROCEDURES

This policy should be considered in conjunction with other Trust policies regarding the safety and welfare of participants, which may include some or all of the following:

### Whistle Blowing Policy

Groundwork Greater Manchester has a Whistle Blowing Policy, which details how a member of staff can express major concerns over apparent wrong doing by GGM, without fear of detrimental treatment or dismissal. The policy provides specific details in relation to reporting suspicions or concerns about colleagues in relation to child protection.

### Health and Safety Policy

Additional health and safety information including risk assessment procedures for all Groundwork activities involving young people or vulnerable groups, including specific assessments for individual young people are detailed in the Health and Safety Policy.

### Recruitment and Selection Policy

### Safer Recruitment Procedure

### Recruitment of People with Criminal Convictions

### Disciplinary Policy

### Complaints Policy

### Grievance Policy

### E: Safety Policy

### Social Media Policy

### Social Media Code of Conduct

### Equality, Diversity and Inclusion Policy

### Volunteer Policy

### Data Protection and Information Security Policies

Additional Information: Summary of Appendices

*Appendix 1: Safeguarding Report Form*

*Appendix 2: Safeguarding Statement*

*Appendix 3: Groundwork GM Safeguarding Management Group Terms of Reference*

*Appendix 4: Designated Safeguarding Lead Role Description*

*Appendix 5: Safer Recruitment Checklist and Procedure*

*Appendix 6: Partner Agreement Form*

*Appendix 7: Useful Contacts*

*Appendix 8: Advice on allocation of additional costs relating to safeguarding*

*Appendix 9: Summary of Main Legislation*

*Appendix 10: Glossary of Terms*