

Safeguarding Policy & Procedure (excl. MSVCC Services)

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1. PURPOSE

- 1.1. To safeguard and promote the wellbeing of the vulnerable adults and children who Causeway Charitable Services works with;
- 1.2. To ensure that all employees and others covered by this policy understand the context within which checking with the Disclosure and Barring Service takes place;
- 1.3. To provide all employees with guidance on how they should behave if they suspect that a child or adult at risk (formerly referred to as vulnerable adults) may be experiencing, or be at risk from abuse or harm;
- 1.4. To guide employees on how to respond to - and report – safeguarding concerns and safeguarding related incidents;
- 1.5. To ensure compatibility with other Causeway policies (see Section 20).

2. SCOPE

2.1. This policy applies to all employees, seconded staff, trustees, volunteers, and students working for Causeway as well as service users (both young people and vulnerable adults) receiving support through the following services:

2.1.1. LifeNavigate

- 2.1.1.1. Plan B
- 2.1.1.2. Merseyside Deferred Prosecution Scheme (MDPS)
- 2.1.1.3. ReFocus
- 2.1.1.4. Immediate Justice

2.1.2. Integration Support

- 2.1.2.1. Bright Future
- 2.1.2.2. LifeLink¹ (non-MSVCC service users)
- 2.1.2.3. LifeLine
- 2.1.2.4. Ingredients for Life

2.2. The safeguarding of service users (both children and adults at risk) within The Modern Slavery Victim Care Contract (MSVCC) services - Accommodation, Outreach and Reach-In, are covered through the MSVCC Safeguarding Policy and Procedure.

3. MANAGEMENT SYSTEM FRAMEWORK

- 3.1. This policy should be read in conjunction with the following Causeway policies and procedures:
 - 3.1.1. Dependant Minors in Service Policy & Procedure
 - 3.1.2. Code of Conduct Policy & Procedure
 - 3.1.3. Complaints and Whistleblowing Policy & Procedure (Service Users)
 - 3.1.4. Confidentiality and Access to Personal Files Policy & Procedure

¹ LifeLink staff are to follow both Safeguarding Policies and Procedures (MSVCC and Non-MSVCC) dependant on which service their Service user falls under.

- 3.1.5. Data Protection and Retention Policy & Procedure
- 3.1.6. Document Security Policy & Procedure
- 3.1.7. Duty of Care Policy & Procedure
- 3.1.8. Equality and Diversity Policy & Procedure
- 3.1.9. Grievance Policy & Procedure
- 3.1.10. Incident Reporting Policy & Procedure
- 3.1.11. Information and Communication Technology (ICT) Policy & Procedure
- 3.1.12. Lone Working Policy & Procedure
- 3.1.13. MSVCC Safeguarding Policy & Procedure for service users and Dependents (Accommodation, Outreach and Reach-In)
- 3.1.14. Recruitment and Selection Policy & Procedure
- 3.1.15. Safety Management System
- 3.1.16. Whistleblowing Policy & Procedure (Staff)

3.2. The following legislation is relevant to this policy, either because it has influenced its introduction and/or its content:

- 3.2.1. Care Act 2014
- 3.2.2. Children and Families Act 2014
- 3.2.3. Children Act 1989, 2004
- 3.2.4. Counter-Terrorism and Security Act 2015
- 3.2.5. Data Protection Act 2018
- 3.2.6. Domestic Abuse Act 2021
- 3.2.7. Equality Act 2010
- 3.2.8. Female Genital Mutilation Act 2003
- 3.2.9. Health and Safety at Work Act 1974
- 3.2.10. Human Rights Act 1998
- 3.2.11. Human Rights at Home: Guidance for Social Housing Provider
- 3.2.12. Human Trafficking Car Standards 2018
- 3.2.13. Management of Health and Safety at Work Regulations 1999
- 3.2.14. Modern Slavery Act 2015
- 3.2.15. Mental Capacity Act 2005
- 3.2.16. Protection of Children Act 1999
- 3.2.17. Protection of Freedoms Act 2012
- 3.2.18. Rehabilitation of Offenders Act 1974
- 3.2.19. Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- 3.2.20. Safeguarding Vulnerable Groups Act 2006 Sexual Offences Act 2003
- 3.2.21. The Police Act 1997
- 3.2.22. The United Nations Convention on the Rights of the Child 1992
- 3.2.23. Working Together to Safeguard Children 2018

3.3. This policy will be reviewed annually as a minimum, and will also be reviewed following any updates or changes in legislation or following a major incident.

3.4. Legal framework

3.4.1. Everyone has a right to be safeguarded from abuse or neglect. There is a legislative framework in place to safeguard children and adults at risk through The Children Act 1989 (as amended by section 53 of the Children Act 2004) and the Safeguarding Vulnerable Groups Act 2006. Further guidance that sets out the requirements and expectations on professionals to work together to effectively safeguard children include Working Together to Safeguard Children (2015), Safeguarding Disabled Children: Practice Guidance (2009) and What to do if you're worried a child is being abused (2015) (Department for Education 2015). Causeway does not have a statutory duty to comply with the key arrangements listed in Working Together, however it should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children, as well as adults at risk.

3.4.2. Female Genital Mutilation (FGM) is illegal in England and Wales under the Female Genital Mutilation Act 2003. It is a form of child abuse and violence against women. While the duties under the Act are limited to regulated health & social care professional and teachers, non-regulated practitioners also have a responsibility to take appropriate safeguarding action in relation to any identified or suspected case of FGM. Due to the nature of the work carried out in Causeway, FGM can be a more common occurrence than in other sectors and the reporting protocols to statutory agencies must be followed.

3.4.3. The Counter-Terrorism and Security Act 2015 sets out the "need to prevent people from being drawn into terrorism". The PREVENT strategy is part of CONTEST, the United Kingdom's overall counterterrorism strategy, and aims to reduce the threat to the UK from terrorism by stopping people becoming radicalised, becoming terrorists or supporting terrorism. Causeway does not have a duty to adhere to the Prevent duty but do still have a responsibility to safeguard and promote the welfare of the children and young people it works with.

4. STATEMENT OF INTENT

4.1. This policy is written in accordance with Causeway's vision and mission to ensure that every adult and child in our care provision is safe, secure and supported to achieve their potential in life. Causeway works directly with adults at risk and children in a range of its projects and programmes and we have a responsibility to promote the wellbeing and safety of all people it comes into contact with. We believe that it is always unacceptable for a person to experience abuse or neglect of any kind. Causeway is committed to practices that protects children and adults at risk from harm and recognises its duty to ensure that appropriate action is taken where a child or adult at risk is experiencing harm or is at risk of harm.

5. DEFINITIONS

5.1. As per the definitions set out in the Children Act 1989, a 'child' is anyone who has not yet reached their 18th birthday. It also includes unborn children.

5.2. Adults aged 18 and over have the potential to be vulnerable (either temporarily or permanently) for a variety of reasons and in different situations. An adult may be vulnerable if he/she:

- 5.2.1. Has a learning or physical disability;
- 5.2.2. Has a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs;
- 5.2.3. Has a reduction in physical or mental capacity;
- 5.2.4. Is in the receipt of any form of healthcare;
- 5.2.5. Is detained in custody;
- 5.2.6. Is receiving community services because of age, health or disability;
- 5.2.7. Is living in sheltered or residential care home;

- 5.2.8. Is unable, for any other reason, to protect himself/herself against significant harm or exploitation.
- 5.3. Therefore, any adults that access the service of Causeway falls into the category of “Adult at Risk”.
- 5.4. We will avoid use of term Vulnerable Adult in our reference to adults at risk.

6. POLICY

6.1. General principles

6.1.1. Safeguarding relates to the action taken to promote the welfare of children & young people and adults at risk and to protect them from harm. All staff should have a basic awareness of safeguarding issues and be fully trained with knowledge on how to deal with safeguarding issues and how to report them.

6.1.2. This includes:

- 6.1.2.1. Being alert to the possibility of abuse and neglect;
- 6.1.2.2. Having enough knowledge to recognise an abusive or potentially abusive event or set of circumstances;
- 6.1.2.3. Knowing who in Causeway to raise concerns with;
- 6.1.2.4. Being competent to take the appropriate immediate or emergency action.

6.1.3. If any member of staff or volunteer has concerns about a young person or adult at risk, they must alert their line manager or the Causeway Safeguarding Lead. See Section 12 for contact details of the Causeway Safeguarding Lead. If at any point the Safeguarding Lead is unavailable, please contact the Head of Services.

6.1.4. Should the Safeguarding Lead believe there are grounds for concern, they will advise upon appropriate action in order to safeguard the child or adult at risk. This may include contacting the relevant local authority social care service or the local police. If a child or adult at risk is in immediate danger the member of staff who first becomes aware of the danger should dial 999 for the police.

6.1.5. The above may include concerns about a member of staff, a suspicion that a child or adult at risk is being abused or neglected, or a suspicion that an activity is taking place that could place a person at risk. If the concern relates to a member of staff, Causeway Safeguarding Lead should contact the local authority designated officer (LADO) responsible for providing advice and liaison in such cases.

6.1.6. In any situation where there is a suspicion of abuse, the welfare needs of the child or adult at risk must come first even where there may be a conflict of interest (e.g., where the suspected perpetrator may be a member of staff or volunteer).

6.1.7. In the safeguarding of children and young people, Causeway recognise the importance of contextualised safeguarding, and will take in to account the specific circumstances and environment of the individual when putting any measures in place, rather than adopting a uniform approach.

6.2. Principles of The Care Act 2014

6.2.1. The following six key principles from The Care Act 2014 underpin all adult safeguarding work:

- 6.2.1.1. **Empowerment:** service users should be supported and encouraged to make their own decisions, underpinned by informed consent.
- 6.2.1.2. **Prevention:** Each service should proactively seek to reduce the risk of harm prior to it occurring.
- 6.2.1.3. **Proportionality:** Responses and interventions should be proportionate to the level of risk.
- 6.2.1.4. **Protection:** Each service should seek to provide support for those in greatest need.

6.2.1.5. **Partnership:** Services should take a community-based approach to safeguarding adults, with strong partnerships between services and local partners.

6.2.1.6. **Accountability:** Personnel should take ownership of their role in safeguarding adults, will be held accountable for their actions, and must act in a transparent manner.

6.3. Principles of The Children Act 1989

6.3.1. The following three key principles from The Children Act 1989 underpin all child safeguarding work:

6.3.1.1. The welfare of the child is paramount;

6.3.1.2. Delay is likely to prejudice the welfare of the child;

6.3.1.3. The court shall not make an order unless to do so would be better for the child than making no order (the 'no order' principle).

6.4. Capacity

6.4.1. Capacity is a guiding principle in safeguarding adults in England and Wales and it must be assumed that an adult has capacity unless proven otherwise. Service users will not be deprived of their liberties; staff will not be making decisions on behalf of service user(s). Where there are concerns about a service user's capacity, staff will assist in making referrals to local authorities.

6.4.2. The principles underpinning work with adults who may lack mental capacity outlined in the Mental Capacity Act are:

6.4.2.1. Must be assumed to have capacity unless it is established that they lack capacity;

6.4.2.2. Is not to be treated as unable to make a decision unless all practicable steps to help them to do so have been taken without success;

6.4.2.3. Is not to be treated as unable to make a decision merely because they make an unwise decision;

6.4.2.4. Any act done or decision taken must be in their best interests;

6.4.2.5. Consideration must be made of whether the outcome could be achieved in a way that is less restrictive of the person's rights and freedom of action.

6.5. What constitutes abuse?

6.5.1. Abuse is a deliberate act of ill-treatment that can harm or is likely to harm a person's safety, wellbeing and development. Abuse can be physical, sexual or emotional. However, abuse may not fall easily into these categories, and staff/associates are not expected to be experts in the field. Neglect also constitutes abuse but can be defined as failing to provide or secure a child or adult at risk with the basic needs required for physical safety and wellbeing.

6.5.2. Causeway recognises that a person's welfare is paramount and that all children and adults at risk, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity, have the right to protection from all types of harm and abuse.

6.5.3. Categories of abuse

6.5.3.1. Children and adults at risk can experience abuse in a number of ways.

6.5.3.2. Forms of abuse that may affect children and adults at risk include:

6.5.3.2.1. **Abuse of trust** occurs where the person in a position of trust or responsibility betrays said trust of an individual or individuals and uses their relationship to abuse them.

6.5.3.2.2. **Child criminal exploitation** occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18.

6.5.3.2.3. **Child sexual exploitation** involves situations, contexts or relationships in which a person under 18 is given something, such as food, accommodation, drugs, alcohol, cigarettes, affection, gifts or money in return for performing sexual activities or having sexual activities performed on them.

6.5.3.2.4. **Child Trafficking** involves the recruitment or movement of people under the age of 18 years for exploitation by the use of threat, force, fraud, or the abuse of vulnerability. Trafficking is a crime that can occur across international borders or within a country.

6.5.3.2.5. **Discriminatory abuse** is the unequal treatment of an individual based on protected characteristics (age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation).

6.5.3.2.6. **Domestic violence or abuse** is an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer.

6.5.3.2.7. **Female Genital Mutilation (FGM)** comprises of any procedure involving partial or total removal of the external female genital organs or any other injury to the female genital organs for non-medical reasons.

6.5.3.2.8. **Financial or material abuse** is the mistreatment of someone in terms of their money or assets, such as their property. Financial abuse often occurs alongside other forms of abuse. It can include money being stolen or misused, fraud or putting someone under pressure in regards to their money or property.

6.5.3.2.9. **Grooming** occurs when a person builds a relationship with a child, young person or an adult at risk so they may abuse them and manipulate them into undertaking tasks. The abuse is usually sexual or financial, but it can also include other illegal acts.

6.5.3.2.10. **Harmful sexual behaviour** is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive.

6.5.3.2.11. **Honour based abuse** is a crime or incident which has, or may have been, committed to protect or defend the honour of the family and / or community. This includes forced marriage.

6.5.3.2.12. **Modern slavery** is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

6.5.3.2.13. **Neglect** is the persistent failure to meet a child or adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

6.5.3.2.14. **Acts of omission** are a failure to provide access to appropriate health, care and support or educational services or the withholding of the necessities of life, such as medication, adequate nutrition and heating.

6.5.3.2.15. **Online abuse** is any type of abuse that happens across the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including social media, text messages and messaging apps.

6.5.3.2.16. **Organisational or institutional abuse** is the mistreatment of people typically in their workplace brought about by poor or inadequate care or support, or systematic poor practice.

6.5.3.2.17. **Physical abuse** occurs whenever a person hurts or harms another on purpose. This includes punching, kicking & slapping. Hitting with an object or projectile. Shaking. Throwing. Scalding and burning. Scratching & biting. Breaking bones. Causing physical disfigurement. Drowning. Physical abuse is an intentional act. It also includes fabricating the symptoms of an illness or causing a child or adult at risk to become unwell.

6.5.3.2.18. **Psychological or emotional abuse** is any type of abuse that involves the continual emotional mistreatment of an individual. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore an individual.

6.5.3.2.19. **Radicalisation of children or vulnerable adults** means someone is being encouraged to develop extreme views or beliefs in support of terrorist groups and activities.

6.5.3.2.20. **Ritual & Spiritual Abuse** takes place when an individual or group engages in coercive and controlling behaviour of others in a faith context. It means using religious beliefs and practices to justify behaviour and actions that are harmful to others.

6.5.3.2.21. **Self-neglect** describes a wide range of behaviours that are neglecting to care for one's personal hygiene, health or surroundings. This includes the behaviour of hoarding.

6.5.3.2.22. **Wilful-neglect** means conscious, intentional failure or reckless indifference to meeting the essential needs of an individual one holds a duty of care to.

6.5.3.2.23. **Sexual Abuse** is sexual behaviour or a sexual act forced upon a woman, man or child without their consent. Sexual abuse includes abuse of a woman, man or child by a man, woman or child. This can occur both physically and online.

6.5.3.2.24. **Hate crime** is any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice based on a protected characteristic ((age, disability, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation).

6.5.3.2.25. **Peer on Peer Abuse** is a term used to describe children abusing other children. Peer-on-peer child abuse can include: bullying (including online bullying and bullying because of someone's race, religion, sexuality, disability or trans status) abuse by one's partner.

6.5.3.2.26. **Mate Crime** is a form of crime in which a perpetrator befriends a vulnerable person with the intention of then exploiting the person financially, physically or sexually.

6.5.3.3. These categories can overlap and an abused child or adult often suffers more than one type of abuse. Disabled children and young people are particularly vulnerable to abuse in any form. Safeguards for disabled children are essentially the same as for non-disabled children. Staff must maintain high standards of practice, remain vigilant to the possibility of a child being abused and minimise situations of risk. All staff must ensure that the children they work with know how to raise concerns, and have access to interpreters/specialist workers/child advocates and other aids to communication if required. Where there are concerns about the welfare of a disabled child, they should be acted upon in accordance with the procedures set out in this policy. The same thresholds for action apply.

6.5.3.4. Where concerns are raised about a child who has communication difficulties, appropriate support, interpreting services and communication aids must be secured.

6.5.3.5. For the procedure to report to police, please see Section 7.1.9 below.

6.6. Staff behaviour

- 6.6.1. At all times, staff, volunteers or students must **NOT**:
- 6.6.1.1. Disregard the lone working policy when meeting with service users on their own;
 - 6.6.1.2. Ask overly personal questions, including those regarding service user age or appearance (unless specifically related to a task, in which case it must be documented);
 - 6.6.1.3. Send/give out material that could be considered offensive, which includes material on social media sites;
 - 6.6.1.4. Initiate or suggest a personal relationship;
 - 6.6.1.5. Take an aggressive or bullying tone;
 - 6.6.1.6. Have physical contact;
 - 6.6.1.7. Have personal contact online and by phone;
 - 6.6.1.8. It is discouraged to accept gifts from service users, however for respect of the service user and them offering you a gift then staff should not accept anything over the value of £5. Such gifts would be a drink, a card, simple box of chocolates;
 - 6.6.1.9. Accept a friend request or other such linking request from a service user on any social media platform.
 - 6.6.1.10. Provide any personal contact details such as personal telephone numbers; email addresses, physical addresses etc.

6.7. Confidentiality and sharing information

6.7.1. When working with children and/or adults at risk, it is important to be clear about confidentiality and consider the possible impact on the child or adult at risk. Confidentiality and safeguarding should be discussed with children and/or adults at risk at the beginning of any piece of work and reminders with information given from time to time, to ensure that they understand the processes and what responsibilities members of staff have. It is absolutely essential to be clear about the limits of confidentiality well before any such matters arise.

6.7.2. While personal information held by professionals and agencies is subject to a legal duty of confidence and should not normally be disclosed without the subject's consent, it is essential that staff respond quickly where they have concerns or suspicions of abuse. Any concerns about confidentiality should not override the rights of children and/or adults at risk of, or suffering, harm.

6.7.3. Causeway's responsibility for protecting children and adults means that, where necessary to protect welfare, it will breach confidentiality to raise concerns. Information sharing must be done in a way that is compliant with the General Data Protection Regulation and Data Protection Act 2018, the Human Rights Act 1998 and the common law duty of confidentiality. However, a concern for confidentiality must never be used as a justification for withholding information when it would be in the child or adult at risk's best interests to share information. Please read further in our Data Protection and Retention Policy and Procedure and Information Security Policy and Procedure.

6.7.4. Causeway recognise that there are occasions where it is necessary to share intelligence with the police where this has a role in the wider safeguarding of children & adults at risk and in the interests of the prevention of crime. If a navigator is unsure if information should be shared in this way, they must consult their line manager or the Causeway Safeguarding Lead at safeguarding@wearecauseway.org.uk.

6.7.5. Do not promise to keep secrets

6.7.5.1. Should it become necessary to pass on information shared by another party this decision should always be discussed with the person in question and where possible their cooperation sought beforehand.

6.7.5.2. Explanations of the reasons; processes; likely sequence of events; and who to contact for information or for support should also be provided.

6.7.5.3. When a child or adult at risk makes an allegation of abuse, they may hope that the abuse will stop without further enquiries. They may fear the effect this will have on their family and may fear retribution from the abuser. They should be helped to understand why the referral (to the Designated Safeguarding Lead) must be made and what is likely to happen as a result.

6.7.5.4. It is important to reassure the child or adult at risk but he/she/they must not be told that their allegation will be treated in a particular way or that the information will be kept a secret.

6.7.5.5. A record should be kept of any decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

6.7.6. Confidential record-keeping

6.7.6.1. Even if a concern has been discussed with a Line Manager/Safeguarding Lead, it is important that all concerns are properly recorded in writing whether or not further action is taken.

6.7.6.2. Causeway has a standard Issue Report Form for recording. This must be submitted to safeguarding@wearecauseway.org.uk within 24 hours of the suspected abuse reported, to help people record relevant information in line with the Incident Reporting Policy and Procedure. Reports that are non-abuse related must be sent to safeguarding@wearecauseway.org.uk within 48 hours. This form must be used for all concerns and passed via email to the Safeguarding Lead as soon as possible. It is important that concerns raised are recorded accurately and in detail. All discussions should end with clear and explicit recorded agreement about who will be taking what action. Where no further action is the outcome the reason for this should be clearly recorded as closed.

6.7.6.3. Some of the information requested by the issue report form may not be available. Staff should not pursue the questioning of the child or adult at risk for this information if it is not given freely. There should be no delay in reporting the matter by waiting for all the information.

6.7.6.4. In completing the form, it is important not to write unknown facts but to stick to the known facts. Staff's opinion may be crucial, but it should be recorded as an opinion and any evidence stated to support these opinions. Records pertaining to issues of child protection may be accessible to third parties such as Children's Services, Police, the Courts and Solicitors.

6.7.6.5. Physical records are kept securely in a locked place (ideally filing cabinet) and digital records are saved to files with restricted access. Managers have a particular responsibility in maintaining the confidentiality of these records and must ensure that the records, or any information they contain, are made available only to relevant parties. The transfer of information - verbally, through the mail, electronically, etc. - should be done in such a way that confidentiality is maintained in line with existing policies.

6.7.7. Sharing information

6.7.7.1. Service users may not give their consent to the sharing of safeguarding information for several reasons. In some cases, such as domestic abuse or hate crime, it is possible that sharing information could increase the risk to the service user. Causeway staff should try to build trust to enable the service user to better protect themselves.

6.7.7.2. Full data storage and sharing policies can be found on Causeways HiBob intranet under section 05. Information Security Management System

6.7.7.3. Staff should:

6.7.7.3.1. Explore why they object to information being shared;

6.7.7.3.2. Explain the concern and why you think it is important to share the information;

- 6.7.7.3.3. Tell the service user who you will be sharing the information with, and your reasons;
- 6.7.7.3.4. Explain the benefits of sharing information – e.g., to acquire better help and support for themselves or for others;
- 6.7.7.3.5. Discuss the consequences of not sharing the information and whether someone may come to harm;
- 6.7.7.3.6. Provide reassurance that the information will only be shared on a need-to-know basis;
- 6.7.7.3.7. Provide reassurance that support is available.

6.7.7.4. Following this, the service user may refuse support with a safeguarding concern or may request that information about them is not shared with other safeguarding partners. In such cases, their decision should be respected.

6.7.7.5. However, there are circumstances where staff can reasonably override such a decision, including:

- 6.7.7.5.1. Where other people are, or may be, at risk, including children;
- 6.7.7.5.2. Where sharing the information could prevent a serious crime;
- 6.7.7.5.3. Where a serious crime has been committed;
- 6.7.7.5.4. Where the risk is unreasonably high and meets the criteria for a multi-agency risk assessment conference referral;
- 6.7.7.5.5. Where staff or volunteers are implicated;
- 6.7.7.5.6. In emergency or life-threatening situations, this may warrant the sharing of relevant information with the emergency services without consent. Consent for this will be acquired at move-in stage;
- 6.7.7.5.7. Where an adult appears to lack the mental capacity to make a decision, this must be properly explored according to the principles of adult safeguarding (see Section 6) and recorded. Services cannot determine that a service user lacks capacity but where personnel have concerns, they should make referrals to local authority for capacity assessments and until that assessment is conducted the request of the service user must be observed.

6.8. Handling disclosures

- 6.8.1. All disclosures should be handled according to the principles of trauma informed practice.
- 6.8.2. Personnel handling disclosures should:
 - 6.8.2.1. Stay calm and try not to show shock;
 - 6.8.2.2. Adopt relaxed and open body language;
 - 6.8.2.3. Listen carefully;
 - 6.8.2.4. Show sympathy;
 - 6.8.2.5. Tell the person that they did a good/right thing in telling you;
 - 6.8.2.6. Tell them you are treating the information seriously;
 - 6.8.2.7. Record facts and note verbatim what the person actually said, using their own words and phrases;
 - 6.8.2.8. As service users may have low English proficiency, you should not correct grammar or vocabulary, and you should not offer your own opinions;
 - 6.8.2.9. Note the setting and anyone else who was there at the time;

- 6.8.2.10. Use black ink and write clearly if recording on a paper form so that the report can be photocopied;
- 6.8.2.11. Sign and date the report, noting time and location;
- 6.8.2.12. Remember that a report may be needed later as part of a legal action or disciplinary procedure.
- 6.8.3. Staff should not:
 - 6.8.3.1. Rush the person due to time pressures;
 - 6.8.3.2. Promise confidentiality;
 - 6.8.3.3. Make promises which cannot be kept (e.g., "I won't let this happen to you again");
 - 6.8.3.4. Ask closed, leading questions (e.g., 'were you raped?');
 - 6.8.3.5. Contact or confront the accused;
 - 6.8.3.6. Be judgmental (for example, "Why didn't you run away?");
 - 6.8.3.7. Stop someone during a disclosure, as this may undermine the relationship of trust.
- 6.8.4. Following disclosures, any current safety risks must be risk assessed and factored into the service user's risk assessment and risk management plan.
- 6.8.5. Where a service user describes a harmful experience occurring currently, staff should be aware of the possibility that medical evidence might be needed. Any forensic evidence associated with a disclosure should be preserved (e.g., in cases of rape or sexual assault). In accommodation this may mean restricting service user and personnel access to the room.
- 6.8.6. Where the person making the disclosure is a child you must be accompanied by another member of staff and must not be alone in a closed room with the child making the disclosure.

7. PROCEDURE

7.1. Reporting safeguarding concerns/incidents

- 7.1.1. The Safeguarding Lead should be informed, unless they are implicated then the Head of Services should be contacted instead.
- 7.1.2. A safeguarding issue report must be completed and submitted as per the guidance below at the earliest opportune moment no later than 24 hours post the incident.
- 7.1.3. Depending on the local authority procedure, an alert may need to be raised via an approved incident form as per local requirements.
- 7.1.4. If there is an immediate risk to an individual, where there is suspicion that a crime has been committed, or where emergency medical treatment is required, emergency services should be contacted immediately on 999.
- 7.1.5. A log is kept in the form of Safeguarding Trackers showing details of all cases and outcomes as well as logging appropriate actions taken, and reporting of incidents to the appropriate authorities.
- 7.1.6. The information should not be shared with other colleagues who do not have a safeguarding role, or with family members or friends.
- 7.1.7. As capacity is an important principle in safeguarding adults, referrals to the police or social care should generally be made with the consent of the adult. Exceptions may be made where the individual is at immediate risk or does not have capacity.

7.1.8. Procedure for reporting A Safeguarding Concern/Incident:

- 7.1.8.1. Report the concern/incident to your Line Manager;

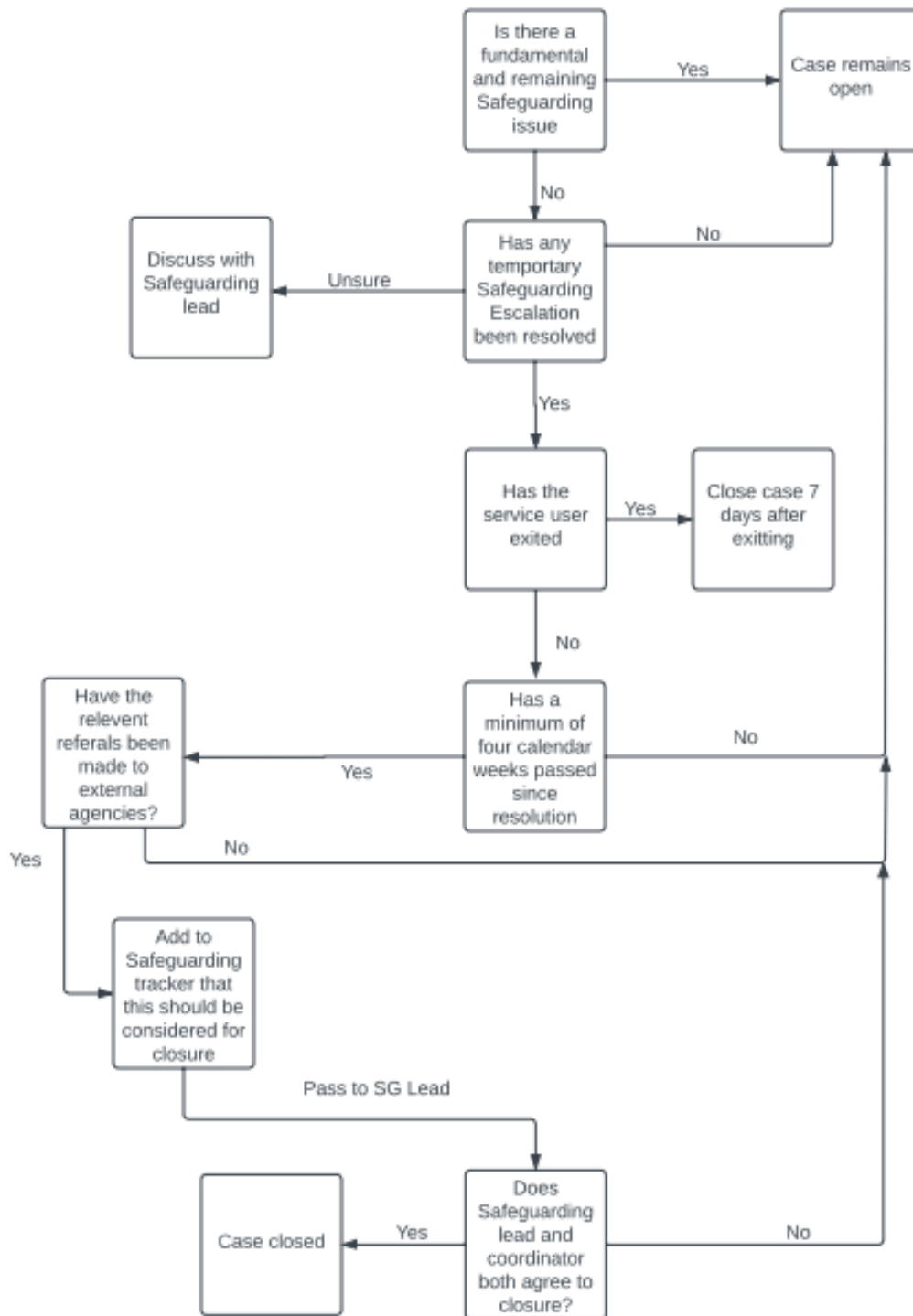
- 7.1.8.2. Put measures in place to immediately safeguard service user(s);
- 7.1.8.3. Complete an Issue Report Form selecting issue type '-09' for safeguarding, and ensure the form is checked by your line manager (coordinator);
- 7.1.8.4. Line manager to send completed Issue Report Form to Safeguarding Lead along with list of current actions and measures in place. See Section 12 below for contact details;
- 7.1.8.5. Safeguarding will email back with suggested actions;
- 7.1.8.6. Safeguarding tracker will be updated;
- 7.1.8.7. If required, a safeguarding strategy meeting and/or a training review will be put in place.
- 7.1.8.8. If a concern is raised out of hours this must be reported first to the relevant on call manager who will advise any further action that should be taken. An email must then be sent to safeguarding@wearecauseway.org.uk documenting what those concerns are and what has been done,

7.1.9. Procedure for reporting to the police:

- 7.1.9.1. Issues, circumstances or incidents of the following nature will be reported to the police and/or the local authority within a period of one calendar day:
 - 7.1.9.1.1. Antisocial behaviour, suspicious or criminal behaviour, threatening behaviour, harassment;
 - 7.1.9.1.2. Behaviour that may indicate that someone is involved in violent extremism, radicalisation or vulnerability to radicalisation;
 - 7.1.9.1.3. Neglect, sexual harassment or exploitation;
 - 7.1.9.1.4. Domestic abuse; or
 - 7.1.9.1.5. Relating to the safeguarding of children.

7.2. Closing safeguarding reports

- 7.2.1. Once a safeguarding concern has been alleviated or is no longer relevant (for example a client has exited) a case can be passed to the Safeguarding Lead for approval to close.
- 7.2.2. As a best practice rule we should allow four weeks after a safeguarding concern has been deemed alleviated before we close a case to ensure that we are not expending time reopening a new report if there is a swift relapse. We should allow a week after a client has exited the service before requesting closure in case they are returned back
- 7.2.3. Once passed to the Safeguarding Lead, they will make the decision if the case should be closed or not. This decision is passed back to the coordinator who will take the appropriate action.
- 7.2.4. Please see below flow chart when deciding whether to submit a safeguarding case to the Safeguarding Lead for closure.



7.3. Safe recruitment

7.3.1. Causeway has a Recruitment and Selection Policy and Procedure to ensure all staff and volunteers are able to work with adults and children.

7.3.2. All service user facing roles will be subject to an enhanced DBS check prior to their commencement . This must include a check against the Children’s Barred List for any staff member who will be working with minors.

7.3.3. Allegations against staff

7.3.3.1. Any suspicion, allegation or actual abuse of a child or adult at risk by an employee, trustee, volunteer, mentor, student, agency worker, contract, and unpaid staff must be reported to the Safeguarding Lead and to the Head of People and Culture immediately.

7.3.3.2. Concerns about staff must be treated with the same rigour as other concerns. If there are concerns that abuse has taken place the Safeguarding Lead will pass this information to the Local Authority Designated Officer (LADO) for investigation. The Safeguarding Lead and Head of People and Culture will work with the member of staff's line manager. The staff member should follow Causeway whistleblowing policy. If the Safeguarding Lead or Head of People and Culture is implicated, concerns should be referred directly to Causeway's Head of Services.

7.3.4. Reporting a serious safeguarding incident

7.3.4.1. If any member of staff is involved in an actual or suspected serious safeguarding incident, or if a serious safeguarding incident takes place within any of Causeway's workplaces or working context, in addition to following the protocols set out within this policy, it should also be reported to the Charity Commission. It is the responsibility of Trustees to ensure that this takes place. All suspected serious or actual serious safeguarding incidents should be reported by the Board of Trustees, to the Charity Commission by email at: RSI@charitycommission.gsi.gov.uk.

7.3.4.2. In addition, immediate action should be taken to:

7.3.4.2.1. Prevent or minimise any further harm;

7.3.4.2.2. Report it to the police, if it is suspected a crime has been committed, and to any other regulators or contractors Causeway is accountable to;

7.3.4.2.3. The Local Authority must be informed within three working days of a serious complaint being lodged;

7.3.4.2.4. A log is kept in the form of Safeguarding Trackers showing details of all cases and outcomes as well as logging appropriate actions taken, and reporting of incidents to the appropriate authorities;

7.3.4.2.5. Plan what to say to staff, volunteers, members, the public and the media;

7.3.4.2.6. The information should not be shared with other colleagues who do not have a safeguarding role, or with family members or friends;

7.3.4.2.7. Review what happened and prevent it from happening again - this may include strengthening internal controls and procedures, and/or seeking appropriate help from professional advisers.

7.3.4.3. Under no circumstances should any person cited in a safeguarding concern undertake the enquiry or interfere with due process.

7.3.4.4. If a staff member resigns, retires or changes role following a safeguarding incident, the enquiry must conclude with a decision on the action that would have been taken had the accused still been employed or volunteering. The case should be discussed with the MST and local authorities who will recommend any further action, which may include referring an individual to the Disclosure and Barring Service.

7.3.4.5. In situations where a crime may have been committed within Accommodation, staff should take steps to preserve evidence. In all other services staff should encourage service user to take steps to preserve evidence. Advice should be taken from police. This may involve locking doors to the room, taking care not to disturb the area. Any documentary evidence should be kept in secure storage.

7.3.4.6. If the allegation is found to be malicious or false, information regarding the allegation will not be included in the individual's personnel file. Information regarding the allegation may be retained in relation to the complainant.

7.3.4.7. Unsubstantiated or unfounded allegations should result in rights being reinstated on a managed timeframe.

7.3.4.8. Substantiated allegations must be passed on to the relevant organisations including the local authority, the Disclosure and Barring Service and the Police and the Authority. Records will be retained in line with Causeway's information retention guidelines.

7.3.4.9. Staff may receive current or historic allegations of abuse. All concerns or allegations of abuse must be taken seriously and respond to without delay, reporting to the police or statutory authorities as required and following Causeway's procedures. It is essential that service users and dependents are listened to, and it is understood that it is right to report concerns. Any delay in an individual reporting an incident should not cast doubt on its truthfulness.

7.3.4.10. Causeway will always be required to follow DBS referral guidance and in some circumstances have a legal duty to make a referral to the Disclosure & Barring Service. The power to refer can be used when an organisation thinks a current or dismissed member of staff has either;

7.3.4.11. harmed or poses a risk of harm to a child or adult at risk;

7.3.4.12. has satisfied the harm test; or

7.3.4.13. has received a caution or conviction for a relevant offence and;

7.3.4.14. the person they're referring is, has or might in future be working in regulated activity and;

7.3.4.15. the DBS may consider it appropriate for the person to be added to a barred list.

7.4. Training

7.4.1. On induction, all staff are trained on safe standards of lone working and safeguarding training in order to work with service users face to face.

7.4.2. Staff will complete safeguarding training as follows:

7.4.2.1. **Core Training** is delivered annually and covers:

7.4.2.1.1. Safeguarding Adults at risk;

7.4.2.1.2. Safeguarding Children;

7.4.2.1.3. Lone Working;

7.4.2.1.4. Vicarious Trauma;

7.4.2.1.5. Unconscious Bias;

7.4.2.1.6. Counter Terrorism.

7.4.2.2. **Refresher Training** is refreshed delivered annually and covers:

7.4.2.2.1. Modern Slavery;

7.4.2.2.2. Domestic Violence;

7.4.2.2.3. Hate Crime/Mate Crime;

7.4.2.2.4. Honour Based Violence;

7.4.2.2.5. Female Genital Mutilation;

7.4.2.2.6. Exploitation including Child Sexual Exploitation;

7.4.2.2.7. Radicalisation;

7.4.2.2.8. Internet Abuse;

7.4.2.2.9. Mental Capacity Act.

7.4.2.3. **Specialist Training** is service specific, delivered and refreshed to selected delegates and covers:

- 7.4.2.3.1. Paediatric First Aid (renewed every 3 years);
- 7.4.2.3.2. Basic First Aid (renewed every 3 years);
- 7.4.2.3.3. Drug and Alcohol Addiction (annual training);
- 7.4.2.3.4. Mental Health First Aid (renewed every 3 years).

8. CONTACT DETAILS

8.1. If you suspect that a child or adult at risk needs protection or is at risk of abuse, please contact Causeway’s Safeguarding Lead:

Name	Email address	Phone number
Paul Armstrong	safeguarding@wearecauseway.org.uk	+44 (0)7511 177 093

8.2. As stated in section 6.3, if the Safeguarding Lead is not available, staff should contact the Head of Services:

Name	Email address	Phone number
Louise Andala	louise.andala@wearecauseway.org.uk	+44 (0)7710 097 673

9. ROLES AND RESPONSIBILITIES

9.1. Organisation duties and responsibilities

- 9.1.1. Raise awareness of the need to protect children and adults at risk and reduce risks to them,
- 9.1.2. Ensure that staff in contact with children and adults at risk have the requisite knowledge, skill and qualifications to carry out their jobs safely and effectively;
- 9.1.3. Ensure safe practice when working in partnership with other organisations, in particular that they have in place adequate safeguarding arrangements, including appropriate policies and mechanisms to provide assurance on compliance;
- 9.1.4. Maintain an organisation that is safe for all staff, children and adults at risk and an environment where poor practice is challenged,
- 9.1.5. Ensure that all staff, trustees, volunteers and students who will be working with children and adults at risk' consent to vetting through the Disclosure and Barring Scheme where applicable;
- 9.1.6. Ensure that when abuse is suspected or disclosed, it is clear what action must be taken;
- 9.1.7. Ensure that the CEO, management board, Safeguarding Lead and trustees are accountable for the effective implementation of this policy;
- 9.1.8. Ensure that all staff receive a copy of the safeguarding policy, are trained and understand their responsibilities.

9.2. Responsibilities of the Safeguarding Lead

- 9.2.1. The Safeguarding Lead at Causeway is responsible for ensuring that safeguarding is given high priority.

9.2.2. The Safeguarding Lead has the relevant training to lead in this specific area. Causeway is also fully committed to providing advanced training.

9.2.3. Specific responsibilities include:

9.2.3.1. Providing support and advice to managers and all staff on safeguarding matters related to children and adults at risk;

9.2.3.2. Ensuring that all members of staff receive training on child protection and safeguarding as part of their induction, and on an ongoing basis where required;

9.2.3.3. Managing cases reported and working with Senior Management to ensure resolutions, ensuring that all are tracked and monitored;

9.2.3.4. Carrying out and directing referrals to the relevant local authority social care team where abuse of a child or adult at risk is reported or suspected;

9.2.3.5. Referring the matter to the local authority Designated Officer (LADO) where a member of staff is suspected of abuse;

9.2.3.6. Maintaining an overview of safeguarding issues and monitoring the implementation of this policy, in conjunction with Head of People and Culture;

9.2.3.7. Ensuring that all safeguarding issues are recorded and stored within the regulations of Data Protection Policy and Procedure.

9.2.4. The Safeguarding Lead has the responsibility for deciding whether to refer any reported matters onto the police or to the local authority social care service. Where possible, referrals should be made on the same working day and certainly within 24 hours. It is the responsibility of the Safeguarding Lead to decide whether the parents/carers (if applicable) of the child or young person should be informed of the referral. It is always best practice, unless unsafe for the child or young person that the parent is informed.

9.2.5. Causeway recognises the importance of safeguarding, in the event of the Safeguarding Lead leaving post, they will be immediately replaced and appointed by the Head of Services.

9.3. Responsibilities of the Head of People and Culture, and the Head of Services

9.3.1. Overseeing and line managing the Causeway Safeguarding Lead;

9.3.2. Supporting the Safeguarding Lead in their above responsibilities;

9.3.3. Auditing the operation of policies and procedures;

9.3.4. Implementing a training strategy for employees;

9.3.5. Ensuring that policies and procedures are implemented throughout Causeway;

9.3.6. Ensuring that the organisation's safeguarding policies are reviewed annually.

9.3.7. Oversight of safe recruitment ensuring that the appropriate checks and paperwork are in place as part of the staff and volunteer recruitment process.

9.4. Responsibilities of trustees

9.4.1. To comply with their legal duties, trustees must react responsibly to reports of safeguarding risks and incidents of abuse and take steps to make sure all staff know how to deal with these. Trustees should report a serious incident to the Charity Commission if:

9.4.1.1. Beneficiaries have been, or are alleged to have been, abused or mistreated while under the care of Causeway, or by someone connected with Causeway, for example a trustee, staff member or volunteer;

9.4.1.2. There has been an incident where someone has been abused or mistreated (alleged or actual) and this is connected with Causeway activities;

9.4.1.3. There has been a breach of procedures or policies at Causeway which has put beneficiaries at risk, including a failure to carry out checks which would have identified that a person is disqualified under safeguarding legislation, from working with children or adults;

- 9.4.1.4. There is loss of Causeway money or assets;
- 9.4.1.5. There is damage to Causeway property;
- 9.4.1.6. There is harm to Causeway work or reputation.

9.5. Responsibilities of all managers and coordinators

- 9.5.1. Individual line managers are responsible for ensuring staff comply with the expectations set out within this policy.
- 9.5.2. Specific responsibilities include:
 - 9.5.2.1. Being the first point of contact for reports of concerns;
 - 9.5.2.2. Escalating all concerns to the Safeguarding Lead;
 - 9.5.2.3. Providing an issue report with clear information regarding safeguarding concern;
 - 9.5.2.4. Providing advice and support to employees reporting disclosures or concerns;
 - 9.5.2.5. Working with the Safeguarding Lead to resolve issues.
 - 9.5.2.6. Attending regular meetings with Safeguarding Lead.

9.6. Employee responsibilities

- 9.6.1. All Causeway staff have a responsibility to ensure the safety of children and adults at risk with whom they work. It is the responsibility of staff to promote good practice and minimise and manage potential risks. All staff – including volunteers, freelance staff and students - must be aware of the requirements within these procedures.
- 9.6.2. Action to safeguard: Causeway) staff have no powers to investigate abuse. Nonetheless all staff have a duty to safeguard and promote the welfare of children and/or adults at risk and a responsibility to work closely and co-operatively with other agencies in order to achieve this.
- 9.6.3. Staff and volunteers may have a role as referrers, witnesses or supporters in safeguarding processes. If a member of staff or volunteer suspects that a child or adult at risk is being harmed by experiencing, or already has experienced abuse or neglect and/or is likely to suffer harm in the future, they must talk to the Safeguarding Lead. The Safeguarding Lead will agree next steps including making any necessary referrals. If anyone other than the Safeguarding Lead makes a referral, they should inform the Safeguarding Lead as soon as possible. It is not the responsibility of Causeway to decide whether or not abuse has taken place. It is the responsibility of staff at Causeway to act if there is cause for concern, in order that the appropriate agencies can investigate and take any action necessary to protect the young and/or adult at risk. If a member of staff is concerned that a child is in immediate danger, or requires immediate medical treatment, they should call the police and/or emergency medical services on 999 straight away.

9.7. External agencies

- 9.7.1. Causeway works together with other appropriate agencies to promote the safeguarding of adults and children, including but not restricted to:
 - 9.7.1.1. Local Authorities;
 - 9.7.1.2. Police;
 - 9.7.1.3. Probation;
 - 9.7.1.4. Interpol;
 - 9.7.1.5. Healthcare Providers;
 - 9.7.1.6. Department for Work and Pensions;
 - 9.7.1.7. Asylum Accommodation and Support Providers;

- 9.7.1.8. Safeguarding Children Partnerships;
- 9.7.1.9. Safeguarding Adults Boards;
- 9.7.1.10. Children's and Adults Social Care;
- 9.7.1.11. Mental Health teams;
- 9.7.1.12. Domestic Abuse and Honour Based Violence Agencies and Charities;
- 9.7.1.13. Local Care Advocacy;
- 9.7.1.14. Participation in local MARAC (Multi-Agency Risk Assessment Conference) arrangements, and MAPPA where necessary.

9.7.2. Service users at risk or with specific needs will be referred to local authority teams for care and support assessments, and relevant information will be provided to the local authority in line with guidance.

9.7.3. Children are the responsibility of the service user. Causeway does not provide registered childcare. However additional safeguards for children in service are in place based on the context of the service. While our service users are the focus of support work, support workers should check on dependents and assess their needs. Specific consideration is given to whether a dependent minor requires specialist support and referrals may need to be made to Local Authority Children's Services on assessment of the child's needs.

10. COMPLIANCE

10.1. It is essential that staff work to a high standard of professional conduct and act with integrity at all times, in order to minimise the risk of abuse from within Causeway. It is essential to create a work environment where the risk of abuse is minimised and children and adults at risk feel comfortable and safe. When incidents of abuse are raised or suspected, it is important that staff have the necessary information and support and follow the procedures appropriately.

10.2. Staff should make sure they have read Causeway safeguarding procedures in full. During induction Causeway will deliver two online e-learning modules; Safeguarding Adults, and Safeguarding Children. Causeway will also provide staff with and a pocket-sized quick reference tool called 'The Safeguarding Guide' for them to keep about their person, as well as safeguarding packs. Staff are encouraged to raise any issues requiring clarification; or queries regarding the training received, with their line manager. Staff should make sure that they have a working knowledge of the different forms of abuse and possible indicators and understand the training that has been provided to them on safeguarding.

10.3. All staff should ensure that, when working with children and/or adults at risk, all colleagues, volunteers and other staff from partnering organisations have the appropriate employee checks in place which must include a full career history, identity checks and references and adherence to Disclosure & Barring Service (DBS) where applicable.

10.4. A regulated activity is a term related to certain roles that involve working with children or adults at risk, including care work, teaching and/or coaching. Where Causeway undertake a regulated activity with a child, we must obtain signed consent from that child's parent or guardian before the undertaking of that activity commences.

APPENDIX ONE – LifeNavigate

1. PLAN B

- 1.1. All Causeway staff working within the Plan B Custody Navigator programme will at times be working in partnership with South Yorkshire Police and as such will also be working in a Police custody environment. While this is shared space grounded in partnership, all Causeway staff must always observe the policies and procedures set in place via South Yorkshire Police. These are available from a navigator's line manager.
- 1.2. Plan B Navigators must liaise with custody staff before walking down each custody wing, or approaching detainees in their cells.
- 1.3. Custody staff will inform Plan B Navigators of any safeguarding concerns or risks relating to a specific person in their cell to ensure they are not approached.
- 1.4. Blue alarm strips are located throughout custody suites in South Yorkshire and can be triggered by touch.
- 1.5. If a Navigator enters a cell to complete an initial assessment, doors are kept open and custody staff remain close by.
- 1.6. A Navigator must always be aware of exits and ensure they are stood by the door or closest exit when completing initial assessments in cells or interview rooms.

1.7. Intelligence and/or safeguarding issues

- 1.7.1. Navigators coming by way of intelligence or safeguarding disclosures through custody intervention/engagement, should:
 - 1.7.2. Report this to the Custody Sergeant who should assess whether the disclosure is in fact:
 - 1.7.2.1. **'Intelligence'** worthy of dissemination and if so either they or an SYP staff member should submit the intelligence report via Connect on the Navigators behalf; or
 - 1.7.2.2. **A safeguarding issue** worthy of dissemination and if so either they or an SYP staff member should update the risk assessment on Connect accordingly as per section 7.7.4. above.
 - 1.7.3. Record this on the custody log using the following Connect entry:
 - 1.7.3.1. Safeguarding concern reported to (INSERT NAME OF SERGEANT) – related to (INSERT AREA OF CONCERN e.g. drug use, self-harm etc.);
 - 1.7.3.2. Record the disclosure on the Custody Tracker and note who this was reported to;
 - 1.7.3.3. Record on Risk Assessment and Zoho if completing an Initial Assessment with the detainee;
 - Navigators coming by way of intelligence either in a custody setting or community setting, should complete a Partnership Intelligence Report and submit to Force.Intell@southyorks.pnn.police.uk.
- 1.8. When visiting a custody suite with a guest/stakeholder etc. who may not be fully vetted, staff must speak to the Inspector to gain approval to do so before the guest enters the suite.
 - 1.9. Where disclosures are made by a service user, the navigator should follow the standard disclosure process of altering their line manager in the first instance and following their guidance. If any disclosure or subsequent evidence indicates that the service user has been involved in sexual crime, arson or any other crime that does not fit with the Plan B criteria, the navigator must report this to their line manager and support for the service user will stop immediately.

1.10. Any service user under the age of 18 must be accompanied in the custody suite by an appropriate adult. The role of an appropriate adult is to ensure that a young person or adult at risks welfare is safeguarded, and their entitlements ensured whilst they are held, interviewed or processed in a custody situation, and to ensure that they understand what is happening and why.

1.11. In a community setting, if it is risk assessed that a service user is unsafe to be with on a one-to-one basis, a minimum of two navigators must be present. The service user must not be accompanied by an unauthorised third party. Community meetings must take place in a public area and not in the service user's home.

1.12. Signed consent must be obtained from the parent or guardian of any service user under the age of 18 years before working or meeting in the community.

1.13. Although an appropriate adult is not required in a community environment, a young person's parent or guardian should be permitted to attend with them.