



Safeguarding Policy

May 2024

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Policy Governance

Responsible	Head of HR & Organisational Development
Accountable	PSPS Board and Chief Executive
Consulted	Senior Leadership Team/Trade Union - Unison
Informed	PSPS Employees

Scope

Safeguarding children and adults at risk is a priority for PSPS. The activities carried out by PSPS may mean that there are a range of employees who may come into contact with people who are at risk of harm.

It is the responsibility of everyone within PSPS to help promote the welfare of children and adults at risk and report any safeguarding concerns to the relevant person.

This policy, and associated procedures, upholds PSPS's duties and reinforces our values and responsibilities in ensuring we provide a safe and responsive environment which safeguards children and adults at risk.

It demonstrates compliance with UK legislation, policy guidance, research and good practice.

This policy applies to all employees' agency staff and contractors, including the Board of Directors or anyone working on behalf of PSPS.

Key Points

PSPS has a responsibility to safeguard the welfare of all children and adults at risk who are involved in, or affected by, our work.

This policy sets out our approach to reducing and managing risks, and the action employees are asked to take when dealing with safeguarding concerns.

The purpose of this policy is to ensure:

- The safety needs and interests of children and vulnerable adults who receive PSPS services are upheld.
- Appropriate response is made to protect all children and vulnerable adults who may be experiencing abuse.
- Employees are provided with the overarching principles that guide our approach to safeguarding.

This policy provides clear procedures on what to do if you have a safeguarding concern, how to manage, respond and refer those concerns, and where to go for help and support.

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1. Our Approach to Safeguarding

Safeguarding Group, Roles & Responsibilities

1.1 A Safeguarding Group, led by the Designated Safeguarding Lead, has been formed to provide advice and support in relation to this policy.

The Safeguarding Group includes –

Designated Safeguarding Officer (DSO)

Lewis Duckett, Chief Executive

E-mail: safeguarding@pspsl.co.uk

Deputy Safeguarding Officer (DDSO)

Aileen Whatmore, Head of HR & Organisational Development

E-mail: safeguarding@pspsl.co.uk

Safeguarding Officer Lead (SOL)

Anna Waddell, HR Operational Lead

E-mail: safeguarding@pspsl.co.uk

- 1.2** The Safeguarding Group will provide advice and support to employees and the organisation about all elements of safeguarding and ensure compliance with policies and procedures.
- 1.3** The Safeguarding Group will liaise with and seek advice from external agencies, as required and oversee investigations into allegations and concerns of abuse,
- 1.4** The Deputy Safeguarding Lead is responsible for consultation and advice in relation to the implication of safeguarding issues in safer employment, disciplinary, or grievance procedures.

2. Recruitment

- 2.1** PSPS has rigorous and robust recruitment procedures in place to ensure that we appoint employees that are appropriately qualified and have the skills and knowledge to deliver a quality service.
- 2.2** The law in the UK makes it clear that, under certain circumstances, criminal background checks can be used as part of recruiting paid staff and volunteers, criminal background checks are carried out by the Disclosure and Barring service (DBS)
- 2.3** PSPS has a legal duty to carry out full criminal background checks for roles that involve very specific tasks that are considered regulated activity or regulated work.
- 2.4** PSPS is entitled to carry out full criminal background checks for roles that involve substantial, unsupervised contact with children or adults at risk, but do not involve carrying out tasks that constitute regulated activity or regulated work.
- 2.5** PSPS is not eligible to ask for full criminal background checks for any other roles. Requesting a full criminal background check for a role that is not eligible is unlawful.
- 2.6** PSPS will only carry out the appropriate level of criminal background checks on successful applicants, for employee roles, where it can be clearly demonstrated that such a check is justified under the relevant national law.
- 2.7** Where a role requires a DBS check then PSPS will ensure that the Recruitment Policy is followed in relation to DBS and recruiting Ex-Offenders.

3. Learning & Development

- 3.1** All employees will be made aware of their role in supporting PSPS's safeguarding responsibilities.
- 3.2** There are different levels of training provided which are relevant to different roles and responsibilities within PSPS.

4. Definitions

- 4.1 Child** - Any person under the age of 18 years (Children Act, 1989).
- 4.2 Adult at Risk** - is a vulnerable adult who is over the age of 18 who is, or may be for any reason, unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
- 4.3 Safeguarding** - In its simplest terms safeguarding can be defined as 'keeping children and adults at risk safe from harm'. It is a broad term that can refer to things such as road safety and playground safety, as well as specific abuse.
- 4.4 Child Protection** - Is part of safeguarding and refers to the activity undertaken to protect young people. It focuses on specific types of abuse and our response to its occurrence.
- 4.5 Local Authority Designated Officer** - Working Together to Safeguard children, 2018 says that local authorities should have designated a particular officer (a qualified social worker), or team of officers (either as part of multi-agency arrangements or otherwise), to be involved in the management and oversight of allegations against people that work with children.

Local authorities in England should identify designated officers (referred to as the LADO) to be involved in the management and oversight of individual cases of allegations of abuse made against those who work with children as set out in the Local Authorities duties under section 11 of the Childrens Act 2004.

Local authorities will also have procedures for dealing with allegations against people who work with adults at risk.

5. Types of Abuse

- 5.1** The commonly held definition of abuse, is *"a pattern of behavior used by one person to gain and maintain power and control over another."*
- 5.2** These behaviors can take on a number of different forms. Below are the different types of abuse:
- Physical
 - Sexual
 - Verbal/Emotional
 - Domestic Abuse

- Neglect
- Child Sexual Exploitation
- Mental/Psychological
- Finance/Economic
- Cultural/Identity
- Modern Slavery & Human Trafficking

5.3 Physical

This is the type of abuse that many people think of when they hear the word 'abuse.' It can include punching, hitting, slapping, kicking, strangling, or physically restraining a partner against their will. It can also include driving recklessly or invading someone's physical space, and in any other way making someone feel physically unsafe.

It can include the misuse of medication. Physical harm may include a parent or carer fabricating the symptoms of, or deliberately causing ill health to a child or young person they are looking after.

Physical abuse can result from a deliberate act, but can also be caused by omission, neglect or failure to protect a child or young person or adult at risk.

5.4 Sexual

Sexual abuse involves forcing or enticing a child or adult at risk to take part in sexual activities, whether or not they are aware of or consent to what is happening. This may involve physical contact, including penetrative acts such as rape, buggery or oral sex or non-penetrative acts such as fondling, inappropriate touching and indecent exposure. It can include sexual harassment, sexual teasing or innuendo.

It can also include involving children (with or without consent) or adults at risk (without consent) in the production of or looking at, pornographic material or watching sexual activities, exposure to on-line images or any other use of ICT to carry out or promote child abuse. Further activities of concern include encouraging children or young people to behave in sexually inappropriate ways, including prostitution.

5.5 Verbal/Emotional

Emotional abuse is the persistent emotional ill treatment of a child or adult at risk which causes adverse effects on their emotional development. This can take the form of humiliation, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, verbal abuse, stalking, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

It may involve making an individual feel or believe that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. In the case of children, it may feature age or developmentally inappropriate expectations being imposed on children or young people. It may involve causing children or young people to feel frightened or in danger, or the exploitation or corruption of a child or young person.

Emotional abuse can also include seeing or hearing the ill-treatment of others, for example through instances of domestic abuse. Further instances of concern could include the over-protection and limitation of exploration and learning or preventing a child from participating in normal social interaction.

5.6 Domestic Abuse

This is defined as any incident or pattern of incidents of controlling, coercive, threatening degrading and violent behavior, in the majority of cases by a partner or ex-partner but also by a family member or carer.

Controlling behavior is defined as acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behavior.

Coercive behavior is defined as an act or a pattern of assault, threats humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim. Threatening behavior includes threats of violence, threats of suicide or threats to take the children from the abused parent. It also includes any kind of physical abuse.

5.7 Neglect

Neglect is the persistent failure to meet a child's or adult at risk's basic physical and/or psychological needs, likely to cause the impairment of their health or development. It may involve a parent or carer ignoring medical, emotional or physical care needs by failing to provide adequate food, shelter or clothing, failing to ensure that the home is safe, leaving a young child alone or without appropriate childcare, or failing to secure appropriate medical treatment.

It may also include neglect of, or unresponsiveness to, their basic emotional needs. Neglect may occur pre-birth as a result of maternal substance abuse or self-harm.

5.8 Child Sexual Exploitation

The sexual exploitation of children and young people involve exploitative situations, and relationships where a child receives 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing, and/or others performing on them, sexual activities. Child sexual exploitation can occur through use of technology without the child's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones.

In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships is usually linked to the child or young person's poor economic, social or emotional situation.

5.9 Mental/Psychological

Mental or psychological abuse happens when one person, through a series of actions or words, wears away at the other's sense of mental wellbeing and health.

It often involves making the victim doubt their own sanity. The result of this, especially over a sustained period of time – and often with the isolation that abusers also tend to use – is that the victim depends on the abuser more and more because they don't trust their own judgment.

They often hesitate to tell anyone about the abuse they're experiencing, for fear they won't be believed.

5.10 Financial/Economic

Includes theft, fraud, internet scams, coercion regarding an adult's finances. Financial abuse can occur in isolation but is often present alongside other forms of abuse. Potential indicators include:

- Changes in living conditions.
- Lack of heating, clothes or food.
- Inability to pay bills, unexplained loss or misplacement of financial documents.
- Sudden unexpected changes in a will or other financial documents.

Financial abuse can seriously threaten an adult's health and wellbeing, is theft or fraud, and needs a police investigation. If the abuse is by someone who has legal authority to manage the adult's money, the Office of the Public Guardian for deputies and Department for Work and pensions (DWP) should be contacted with the adult's name, address and national Insurance number.

5.11 Cultural/Identity

Cultural abuse happens when abusers use aspects of a victim's particular cultural identity to inflict suffering, or as a means of control. Not letting someone observe the dietary or dress customs of their faith, using racial slurs, threatening or isolating someone who doesn't speak the dominant language where they live – all of these are examples of cultural abuse.

5.12 Modern Slavery & Human Trafficking

Human trafficking is the movement of a person from one place to another for the purposes of exploitation, coercion, abuse of power or abuse of someone's vulnerability.

It is possible to be a victim of trafficking, even if the individual has given their consent to be moved.

Modern slavery, as defined in the Modern Slavery Act 2015, is holding a person in a position of slavery, servitude and forced or compulsory labor.

6. Prevent & Channel

- 6.1** Prevent is one strand of the governments counter-terrorism strategy. The prevent channel in Lincolnshire aims to help local authorities, police, community safety partnerships and others to develop and implement effective actions, which will make their community safer to reduce the risk of terrorism and violent extremism.
- 6.2** Its aim is to disrupt those who promote violent extremism, working with communities to identify those who may be susceptible to being drawn towards a path of violent extremism, and offer them support to divert them away before they commit criminal acts.
- 6.3** Channel uses existing collaboration between local agencies to identify individuals at risk of being drawn into terrorism and develop an appropriate support plan for those concerned. Channel is about early intervention to safeguard children and adults from being drawn into committing a terrorist-related activity.
- 6.4** Signs that an individual may at risk of being involved in violent extremism include:
- Possession of literature regarding military training, skills and techniques.
 - Possession of violent extremist literature.
 - The expression of extremist views advocating violent actions and means.
 - Association with known extremists, seeking to recruit others to an extremist ideology or claims of involvement with organisations espousing extreme violence.
 - Exposure to an ideology that appears to sanction, legitimize or require violence.
 - A range of perceived grievances, real and some imagined, to which there seems to be no credible and effective non-violent response.

If you have a concern that someone you have had contact with is being drawn into committing a terrorist-related activity you should inform the Safeguarding Group.

7. Recording & Reporting Concerns

- 7.1** Employees are asked to report concerns about the welfare of people they come into contact with.
- 7.2** Individuals must never investigate an allegation of abuse unless appointed to do so by a Designated Safeguarding Lead.
- 7.3** In all circumstances, employees should take the following action:
- Ensure their own safety – leave the situation if they are at risk of harm.
 - Where there is clear evidence of harm, or an imminent danger call the emergency services immediately.
 - Treat all allegations of abuse seriously.
 - Report concerns via the SharePoint safeguarding area as soon as possible to inform a member of the Safeguarding Group. [Safeguarding \(sharepoint.com\)](#)

7.4 Responding to a Child/Adult at Risk Concern

If a safeguarding concern comes to your attention, the following actions must be taken by the person receiving the information – the safeguarding form has been designed to prompt you for this information.

- I. If in person, always offer reassurance, listen to and take seriously what is being said. Never promise to keep secrets or be persuaded by the individual or the family not to take action if you are worried that the individual is being harmed or is at risk of harm.
- II. Submit your safeguarding concern via the SharePoint safeguarding page as soon as possible after receiving information. Include -
 - Date and time.
 - words spoken.
 - injuries noticed/disclosed.
 - and a brief outline of the concern or incident.

It may be necessary to undertake some enquiries, including full name, age, mobile number, email address, and any involvement with the client Council's or PSPS's work.

It is not your job to investigate or verify what is being said, or to examine the child/adult; this is the statutory responsibility of the local authority/child protection services and/or the police.

- III. If the child/adult is at immediate risk of harm, (unless doing so would put you or others at risk):
 - 1) Refer immediately to the police by calling 999, or NSPCC on 0800 800 5000.
 - 2) Contact a member of the PSPS Safeguarding Group via safeguarding@pspsl.co.uk to inform them that you are making a safeguarding report.
- IV. Explain the process (where possible) to the child/adult; that you will need to pass this information on, to whom you'll pass it on to, the reasons why, and any possible actions.
- V. Report the concern to a member of the Safeguarding Group, by submitting your safeguarding concern via the safeguarding area of SharePoint.

The Safeguarding Group will review all details of the case and make a clear assessment of whether the information received is deemed to be a child/adult protection referral, and/or a situation in which further action must be taken.

They may also contact external agencies for further information and advice.

- VI. The Safeguarding group will be responsible for agreeing any necessary further action. If a referral is needed to a child/adult protection agency, this will be

completed by a member of the Safeguarding Group as quickly as possible and normally within 24 hours.

- VII. The Safeguarding Group will also complete necessary sections on the respective Safeguarding Record Form to provide details of further people contacted, together with any outcome known at that stage.
- VIII. If, at any point, the situation escalates and it seems that the person is at increased risk, the Safeguarding Group Designated Safeguarding Lead and/or the Deputy Safeguarding Lead must immediately contact the police.
- IX. The Safeguarding Group will attempt to establish the outcome of the referral. If adult/child protection services do not make further contact with PSPS within three days, they will contact them for an update.
- X. The Designated Safeguarding Lead and/or Deputy Safeguarding Lead will inform the individual who raised the concern of the outcome in as much detail as possible, respecting confidentiality.

In many cases this is likely to be an acknowledgement of receipt of the concern, and confirmation that action has been taken.

The person reporting the concern can request an update on the outcome from the Safeguarding Group.

7.5 Out of Hours

If the child/adult is at immediate risk of harm, (unless doing so would put you or others at risk) refer immediately to the police by calling 999, or NSPCC on 0800 800 5000.

Contact the PSPS Safeguarding Group by completing the 'Submit Safeguarding Concern' under the Safeguarding section of SharePoint with all details of the incident and actions taken.

7.6 Where required the Safeguarding Group may refer a safeguarding report or concern to the relevant Client Council's Safeguarding Lead.

PSPS will support its Client Councils through cooperation and information sharing where appropriate to meet their statutory responsibility with regards to Safeguarding.

8 Investigating Allegations of Abuse

- 8.1 Where the individual within the Safeguarding Group decides that the allegations need to be investigated, the issue will be notified to the appropriate local authority, health and social care trust and/or the police.
- 8.2 All enquiries will be managed within the local authority, trust or police procedures, in line with legal and statutory guidance.
- 8.3 The main aim of any enquiries is to prevent or stop harm to children or adults at risk.

- 8.4** PSPS employees may be asked to cooperate as required with any external protection agencies, enquiries or investigations.

9 Allegations of Abuse Made Against PSPS Employees

- 9.1** PSPS must investigate where a PSPS colleague is alleged to have abused someone. The respective people manager, Designated Safeguarding Lead and/or Deputy Safeguarding Lead will discuss the allegation with HR and will make a decision about whether the allegation needs to be reported to the police and/or Local Authority Designated Officer (LADO).
- 9.2** A decision must be made as to whether the colleague is able to continue in their normal duties, or whether adjustments should be made to their work to protect them and/or others. This is in order to allow an investigation to be carried out as quickly as possible, while minimising risk.
- 9.3** The Designated Safeguarding Lead and/or Deputy Safeguarding Lead will advise on the investigative process and an appropriate person to carry out any investigation.
- 9.4** Any adjustment and/or investigation will be carried out under the "PSPS Disciplinary Policy". All employees who are alleged to have abused someone will be signposted to agencies that can provide support until any investigation is concluded.

10 Support for Employees

- 10.1** Certain roles within PSPS may increase the risk of physical, psychological, and emotional harm, such as roles where employees deal with sensitive and challenging situations and issues. PSPS has a duty to ensure that all employees in such roles have access to regular supervision and the opportunity to discuss their own wellbeing.
- 10.2** Our Health and Safety Policy ensures we have arrangements in place to prevent, where possible, violence and aggression occurring whilst working or volunteering, and to take action where necessary to deal with any incidents.
- 10.3** All roles must be assessed carefully by the people in conjunction with the Safeguarding Group, to ensure that signposting for support and provision of training are put in place, as necessary.

All employees have access to the Employment Assistance Programme (EAP). This is a 24-hour specialist service designed to offer confidential information and support across a number of topics.

11 Employee Commitments:

Lone Working

PSPS has a Lone Working Procedure, which provides guidance and information about issues relating to lone working and any individuals working alone must adhere to safer working practice within the Lone Working policy for their own protection.

Code of Conduct

All employees are asked to follow the guidelines set out within the PSPS Code of Conduct, to help protect the integrity of themselves and the organisation.

Training

Complete all training offered related to Safeguarding.

All employees are required to complete the Safeguarding E learning Module within the first 6 months of employment and then refreshed every 2 years thereafter.

People managers and some teams/roles will be invited to a more in-depth training developed and delivered by a member of the Safeguarding Group.

12 Confidentiality

- 12.1 All documentation relating to incidents or allegations of people being harmed, or placed at risk of harm, will be kept and treated confidentially and in accordance with the GDPR Regulations.
- 12.2 This includes information from Safeguarding referrals, individual details, and outcomes of all investigations.
- 12.3 Only those people who need to know about an incident will be kept informed. The minimum relevant information will be stored within a restricted access folder on the server and managed by the Safeguarding Group.

13 Complaints about Safeguarding Actions

- 13.1 If for any reason, a colleague feels that following an investigation into a Safeguarding matter that there is continued concern then this should be raised with the Safeguarding Lead and/or Deputy Safeguarding Lead.
- 13.2 Should a colleague feel, they cannot raise a concern with regards to an investigation with the Safeguarding Lead and/or Deputy Safeguarding Lead then a concern can be raised through the companies Whistleblowing Policy.
- 13.3 All reports will be treated seriously, fairly and impartially.

- 13.4** Any external complaints about the way PSPS have handled a safeguarding issue will be logged through our complaints procedure and addressed by the relevant team in accordance with this.

14 Advice, Support & Links

SELCP	Service Manager, Wellbeing Lincs and Strategic Partnership Safeguarding Lead Email: David.postle@e-lindsey.gov.uk Tel: 01507 613124
ELDC	Service Manager, Housing and Support Solutions and Safeguarding Lead Email: jason.oxby@e-lindsey.gov.uk Tel: 01507 613120
BBC	Community Safety Manager and Safeguarding Lead Email: peter.hunn@boston.gov.uk Tel: 01205 314245

SHDC	Community Safety and Enforcement Manager and Safeguarding Lead Email: dbedford@sholland.gov.uk Tel: 01775 764457
Lincolnshire County Council Children Services Safeguarding	During office hours - 8am to 6pm Tel: 01522 782 111 Outside office hours (including weekends or Bank Holidays) Tel: 01522 782 333 https://www.lincolnshire.gov.uk/safeguarding/report-concern
Lincolnshire County Council Adult Services Safeguarding	During office hours - 8am to 6pm Tel: 01522 782 155 Outside office hours (including weekends or Bank Holidays) Tel: 01522 782 333 www.lincolnshire.gov.uk/adult-care
Lincolnshire Police	IN AN EMERGENCY SAFEGUARDING SITUATION CALL 999 Non-emergency call 101 Lincolnshire Police Central Referral Unit for safeguarding concerns. Tel: 01522 947590 Out of hours Tel: 0300 111 0300
LADO – Local Authority Designated Officer	During Office Hours – 01522 554674 Deals with allegations against staff working with children and young people