



# **Safeguarding and Prevent Policy Key Documents and Procedure**

**2023**

# Safeguarding Policy & Procedures

## 1. .

This policy aims to provide advice on dealing with potential Safeguarding issues, in order to meet the requirements of the Safeguarding Vulnerable Groups Act 2006, amendments and associated legislation.

This policy also provides guidance on dealing with potential extremism and radicalisation issues in order to meet the requirements of the Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance for England and Wales.

The policy encompasses all groups equally, is non-discriminatory and has open and transparent processes.

## 2. Scope

This policy applies to all employees including associates, visitors, customers, learners, suppliers and associates working in partnership with, or for the company. It applies to all our functions, services, and employment practices and activities.

Wale England Care will work with its prime providers to ensure safe working practices and compliance with relevant safeguarding and prevent legislation.

## 3. Key Documents

- 1.0 Safeguarding Implementation plan – How we implement safeguarding
- 2.0 Training CPD Matrix – Confirming all staff have completed Prevent and Safeguarding training
- 3.0 DBS Check – verifying individuals safeguarding status before learner contact
- 4.0 Learners Under the age of 18 Safeguarding policy -policy for U18 onboarding
- 5.0 Safeguarding information pack Learner and Employer – Onboarding info pack
- 6.0 Safeguarding Newsletters – Employers and Learners
- 7.0 Local Safeguarding contacts and updates – South-West of England and Midlands
- 8.0 Safeguarding Policy
- 9.0 Prevent Policy
- 10.0 Designated Safeguarding Officer Info
- 11.0 Safeguarding Action Plan
- 12.0 Prevent Risk register
- 13.0 Safeguarding Induction
- 14.0 Safeguarding Log

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## 4. Key Legislation

The key principles that underpin this Safeguarding policy and guidance are found in the Human Rights Act 1998, the Children Act 2004, the Children and Families Act 2014, Protection of Freedoms Act 2012, and the Safeguarding Vulnerable Groups Act 2006, Children and Social Work Act (England) 2017, Social Services and Well-being (Wales) Act 2014, Counter-Terrorism and Security Act 2015, Mental Health Act (revised) 2007, Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, Additional Learning Needs and Educational Tribunal (Wales) Act 2018. They are explained in the documents including Prevent Duty Guidance for England and Wales, 'Safeguarding Children: Working Together to Safeguard Children', 'Keeping Children Safe in Education' September 2018, Keeping Learners safe 'In Safe Hands: implementing Adult Protection Procedures in Wales', All Wales Child Protection Procedures, Deprivation of Liberty Standards and the 'UN Convention on the rights of the child', to which the United Kingdom is a signatory.

## 5. Policy Statement

The company is committed to practices that protect children, young people and adults who may be at risk from abuse, neglect and/or radicalisation. We also recognise their responsibilities in safeguarding learners and for the promotion of learner wellbeing; our safeguarding practices are an integral and fundamental part of these commitments.

The aim of the Safeguarding Policy is to create and maintain a safe, healthy and supportive learning and working environment for our learners, staff and visitors alike. In all aspects of work, the needs and interests of vulnerable/at risk people will be placed above the needs and interests of all others.

## 6. Responsibilities

### Board of Directors and Senior Managers

It is the responsibility of the Board of Directors and Senior Managers to:

- ensure The company has clear guidelines and policies in relation to safeguarding and prevent legislation in place and is acted on where appropriate,
- take appropriate measures to ensure this policy is fully and effectively implemented,
- ensure that all staff are trained and aware of this policy,
- ensure all staff are aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Officer,
- ensure that appropriate resource is applied to prevent & safeguarding procedures,
- monitor and evaluate the provision of safeguarding & prevent,
- provide advice and guidance as required.

### Designated Safeguarding Lead

It is the responsibility of Designated Safeguarding Lead to:

- ensure that safeguarding strategies are implemented across the Company
- contribute to the development of safeguarding policies and procedures,
- keep up to date knowledge on changes and developments in legislation,
- ensure policies and procedures on safeguarding/prevent are reviewed at least annually,
- support with training for relevant staff as required,
- ensure any concerns are shared with relevant external organisations, in order to minimise the risk of our learners becoming involved with terrorism and/or at risk of harm,
- make decisions on whether to refer to appropriate external organisations / authorities,
- cooperate with any external investigation resulting from a referral,

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- provide Directors, SMT and prime providers with updates on safeguarding/prevent as required.

### Designated Safeguarding Officer

It is the responsibility of Designated Safeguarding Officer to:

- act as the first point of contact for The company staff on safeguarding & prevent matters and disclosures,
- record actions in the Safeguarding log and maintain accurate records,
- contribute to the development of safeguarding policies and procedures,
- collect information regarding referrals and record the details in the safeguarding log,
- present information to the Designated Safeguarding Lead for the appropriate action to be taken,
- take direction and act on instructions given by the Designated Safeguarding Lead and
- promote and comply with all responsibilities as detailed in the all staff section below.
- Deputise for the Designated Safeguarding Lead in their absence

### All Staff

It is the responsibility of all The company staff to:

- create and support an ethos that upholds the Company's mission, vision and values including British Values, to create an environment of respect, equality and diversity and inclusion,
- adhere to the safeguarding policy and support the business in effectively implementing its key safeguarding and prevent procedures and strategies,
- undertake safeguarding and prevent training in order to have the skills to recognise those who may be vulnerable to harm, radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns,
- report any concerns around harm, abuse, extremism or radicalisation via safeguarding reporting channels,
- report and remove any literature displayed around the Company that could cause offense or promote extremist views,
- support the development of learner understanding of the issues around safeguarding, wellbeing, extremism and radicalisation through information advice and guidance as well as activities such as training and awareness sessions,
- participate in engagement with local communities, training providers, and external organisations as appropriate.

### Recruitment

It is the responsibility of the SMT to operate in line with the company's recruitment policy and Safeguarding and DBS Policies and as a minimum:

- Specify in advertisements that offers of employment are subject to reference checks, satisfactory DBS and EWC registration checks based on job role and
- Based on job requirements, process and complete the EWC registration checks, enhanced DBS disclosures and basic disclosures and obtain references as required.

## 7. Risk Definitions

**Child** – any person who has not yet reached their 18th birthday.

**At risk adult** - has needs for care and support; 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.

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**Risk to a vulnerable person** - intentional or non-intentional abuse which results (or could result) in 'significant harm' to the abused person.

### Harm:

- Ill treatment (includes sexual abuse, neglect, emotional abuse and psychological abuse)
- The impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill treatment).
- The impairment of physical, intellectual, emotional, social or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment).

Where the question of whether harm suffered by a vulnerable person is significant, the focus is on the vulnerable person's health or development, their health or development shall be compared with that which could reasonably be expected of a similar individual.

### Indications of Potential Vulnerability

Potential vulnerability could include the following, please note this is not an exhaustive list:

- Abuse
- Bullying including cyberbullying
- Children Missing Education
- Children Missing from Home or Care
- Child Sexual Exploitation (CSE)
- Criminal Exploitation of children and vulnerable adults & county lines
- Drugs
- Fabricated or Induced Illness
- Faith based abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and Youth Violence
- Gender based violence/violence against women and girls (VAWG)
- Hate (Hate)crime
- Mental Health
- Missing Children & Adults
- Peer on Peer Abuse
- Preventing Radicalisation
- Private Fostering
- Relationship Abuse
- Sexting
- Sexual violence and sexual harassment
- Trafficking & modern slavery

**Note:** 'Safeguarding children and young people in education from knife crime' was released by Ofsted in March 2019. We will continue to follow this guidance to identify and respond to persons at risk.

### Actions or omissions that constitute Abuse

Abuse may consist of a single act or repeated acts. It can be physical, verbal, psychological, financial or material. The abuse can be an act of neglect or an omission to act and the abuse may be the unintended consequences of a person's actions. It can and may occur, for example, when a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have

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not consented or cannot consent to. Abuse can occur in any relationship but commonly is an abuse of power.

These are some of the most common types of abuse in relation to vulnerable people.

### **Neglect**

The persistent or severe neglect of a vulnerable person, or the failure to protect them from exposure to any kind of danger, including cold, starvation, neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs, or extreme failure to carry out important aspects of care, resulting in the significant impairment of their health or development, including non-organic failure to thrive.

### **Physical Abuse**

The hitting, slapping, shaking, pushing, kicking, throwing, poisoning, misuse of medication, burning, scalding, drowning, suffocating, undue restraint, inappropriate sanctions or otherwise causing physical harm to a vulnerable person. Physical harm may also be caused when a parent or carer fabricates or induces illness in a vulnerable person who they are looking after.

### **Domestic Abuse**

An incident or a pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. It concerns people aged 16 or over who are or have been intimate partners or family members and it can happen regardless of a person's gender or sexuality". Domestic violence can include, but is not limited to, the following types of abuse: psychological, emotional, physical, sexual and financial. It also includes what is known as 'honour' based violence, female genital mutilation (FGM) and forced marriage.

Domestic violence affects people of every class, gender, wealth, geography, age, race, disability and sexuality. The violence can begin at any stage of the relationship and may continue after the relationship has ended. Domestic violence is a pattern of controlling and aggressive behaviour that is intentional and calculated to exercise power and control within a relationship.

### **Financial or Material Abuse**

Includes theft, fraud, identify theft, pressure around wills, property or inheritance, misuse or misappropriation of benefits/allowances, fraudulent seizure of someone's material assets via power of attorney or eviction

### **Emotional or Psychological Abuse**

The persistent emotional ill-treatment of a vulnerable/at risk person: such as to cause severe and persistent adverse effects, on the person's emotional, behavioural development or well-being. This includes threats of harm, abandonment and humiliation, verbal abuse, racial abuse, isolation and withdrawal from services or supportive networks. It may include not giving an individual opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may involve seeing or hearing the ill-treatment of another and include serious bullying (including cyber-bullying) causing individuals to feel frightened or in danger, or the exploitation or corruption of an individual.

### **Sexual Abuse**

Forced or unforced sexual acts with minors or vulnerable adults. Non-consensual sexual activity (physical contact or non-contact activities) with a vulnerable person whether or not the person is aware of what is happening, including

- Physical contact, including penetrative or non-penetrative acts.

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- Non-contact activities, such as involving vulnerable people in looking at, or in the production of, pornographic material or watching sexual activities.
- Grooming in preparation for abuse (including via the internet).
- Encouraging vulnerable/at risk people to behave in sexually inappropriate ways.

### Discriminatory Abuse

Discriminatory abuse may manifest itself as any of the other categories of abuse previously stated. What is distinctive, however, is that discriminatory abuse is motivated by oppressive and discriminatory attitudes. Examples of discriminatory abuse may include: disability - physical or learning disability, mental, ill-health or sensory impairment; race; gender; age; religion; cultural background; sexual orientation; political convictions; appearance. Examples of discriminatory abuse may take the form of any of those listed under any of the other categories of abuse. The difference lies in that the abuse is motivated by discriminatory attitudes, feelings or behaviour towards an individual.

### Institutional Abuse

Institutional abuse includes the practice of an abusive regime or culture which destroys the dignity and respect to which every person is entitled. It is the mistreatment of people brought about by inadequate care or support, and poor practice that affects the whole setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service or organisation.

### Modern Slavery

Encompassing any type of slavery and / or human trafficking, forced labour and/or 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. This can include: bonded labour, child slavery, early and forced marriage, forced labour, descent-based slavery, trafficking. Many forms of slavery involve more than one element, for example, trafficking often involves an advance payment for the trip and organising a promised job abroad which is borrowed from the traffickers. Once at the destination, the debt incurred serves as an element of controlling the victims as they are told they cannot leave the job until the debt is paid off.

## 8. Prevent Definitions

Prevent is one of 4 strands of the Government's counter terrorism strategy – CONTEST. The UK currently faces a range of terrorist threats. Terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. Therefore, early intervention is at the heart of Prevent which aims to divert people away from being drawn into terrorist activity.

Prevent happens before any criminal activity takes place by recognising, supporting and protecting people who might be susceptible to radicalisation. The national Prevent Duty confers mandatory duties and responsibilities on a range of public organisations, including Work Based Learning Providers, and seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provide practical help to prevent people from being drawn into terrorism and violent extremism and ensure they are given appropriate advice and support.
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, the internet and health

The following are commonly agreed definitions within the Prevent agenda:

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- **An ideology** is a set of beliefs.
- **Radicalisation** is the process by which a person comes to support terrorism and forms of extremism that may lead to terrorism.
- **Safeguarding** is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- **Terrorism** is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological purpose.
- **Vulnerability** describes factors and characteristics associated with being susceptible to radicalisation.
- **Extremism** is vocal or active opposition to fundamental British Values, including democracy, the rule of law, Individual and mutual respect and tolerance of different faiths and beliefs.
- **British Values** are detailed within the Prevent Duty and include democracy, the rule of law, Individual and mutual respect and tolerance of different faiths and beliefs.

### 9. Regulated Activities

A 'Regulated activity' refers to certain roles that involve working with children or vulnerable adults, such as teaching and providing care.

#### Regulated activities relating to Safeguarding Children include;

- 1) Unsupervised activities: teach, training, instruct, care for or supervise children, or provide advice / guidance on well-being, or drive a vehicle only for children;
- 2) Work for a limited range of establishments ('specified places'), with opportunity for contact; for example, schools, children's homes, childcare premises.
- 3) Relevant personal care, for example washing or dressing; or health care by or supervised by a professional;
- 4) Registered Child minding; and foster-carers

These activities are regulated when they are carried out by the same person frequently (such as once a week or more), 4 or more days in a 30-day period, or overnight (between 2am and 6am).

#### Regulated activity relating to Safeguarding Adults

Regulated activities relating to adults are split into six different categories, based on the type of work they involve:

1. Providing healthcare.
2. Providing personal care.
3. Providing social work.
4. Assistance with general household matters.
5. Assisting with a person's own affairs.
6. Conveying a person to a place of social work or care.

Unlike certain regulated activities involving children, these activities are regulated regardless of how many times and how often a person engages in them.



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### 10. Reporting Procedures

**Alleged or suspected abuse, harm or radicalisation of a vulnerable person where the disclosure is not against a member of staff**

**Member of staff taking the disclosure should:**

- Not promise confidentiality but explain that you are obliged to pass this information on;
- Listen carefully and sympathetically;
- Clarify what has happened but try to ask as few questions as possible
- Report on disclosure information to the Designated Safeguarding Officer
- Complete all actions above within an hour of notification

#### **Contact Details for Designated Safeguarding Officer**

Claire Pittaway – [claire.pittaway@walesenglandcare.co.uk](mailto:claire.pittaway@walesenglandcare.co.uk), 01633264121

Where the Designated Safeguarding Officer is unavailable, the duties of that person in relation to Safeguarding will be undertaken by the Designated Safeguarding Lead.

#### **Contact details for Designated Safeguarding Lead:**

Richard Elliott – [Richard.elliott@walesenglandcare.co.uk](mailto:Richard.elliott@walesenglandcare.co.uk), 07964885528

**Alleged or suspected abuse, harm or radicalisation of a vulnerable/at risk person by a member of The company staff:**

**Member of staff taking the allegation**

- Not promise confidentiality but explain that you are obliged to pass this information on;
- Listen carefully and sympathetically;
- Clarify what has happened but try to ask as few questions as possible
- Inform the Designated Safeguarding Officer of the disclosure immediately
- Complete all actions above within an hour of notification

Where the person taking the allegation is also the accused, they must immediately pass the allegation on to another member of staff or the Designated Safeguarding Officer to carry out the actions outlined above and then have no further contact with the person.

Where the Designated Safeguarding Officer (DSO) is the subject of the allegation or unavailable, the duties of that person in relation to Safeguarding will be undertaken by the Designated Safeguarding Lead (DSL).

Where the DSL is the subject of the allegation or unavailable, the duties of that person in relation to Safeguarding will be undertaken by the DSO or a Director.

**A member of the Board of Directors will;**

- Carry out an investigation, together with the person's line manager and the DSL or DSO and suspend the member of staff on full pay pending the outcome of the investigation
- Carry out a thorough, impartial and objective investigation as timely as possible (even if the employee leaves employment) in order to gather sufficient evidence to decide whether the criteria for making a referral has been met

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- Relevant parties will be notified of anticipated timescales for investigation and advised of any reasons for delay and anticipated dates. Processes will be dealt with in accordance with The company's Disciplinary Procedures
- Following investigation, submit a report to the Decision Maker
- If required make the referral to the DBS and/or EWC and liaise with DBS and/or EWC until a decision is made.
- Communicate DBS and/or EWC decisions to relevant parties, including Board of Directors.
- Where a member of staff is barred under the DBS, together with the person's line manager, instigate disciplinary procedures advising that it could result in the termination of employment.
- Ensure that a central record is kept of all communication and reporting occurrences in the Safeguarding file

Note. If an employee is employed in a regulated or controlled job role and becomes barred as a result of conduct inside or outside of their employment, this will be deemed as gross misconduct and dealt with in accordance with The company's Disciplinary Procedures

### 11. Policy Implementation

#### Leadership and Values

To create and maintain a company ethos that upholds core values of shared responsibility and wellbeing for all learners, staff and visitors whilst promoting respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, learner voice and participation.
- Building staff and learner understanding of safeguarding/prevent and confidence to deal with them through mandatory staff training, awareness campaigns and local community engagement activities.
- Actively working with the local safeguarding and prevent Groups.
- Review and amend the Safeguarding Policy annually or earlier in response to changes in legislation
- Operate safe recruitment practices.
- Recognising that if we fail to challenge extremist views, we are failing to protect our learners from potential harm.
- A commitment to creating and maintaining a safe, healthy and supportive learning and working environment for our learners, staff and visitors alike
- Sharing information with third parties so that effective decisions can be made and appropriate preventative action taken
- Ensuring positive action is taken to respond to disclosures or suspicions of any form of abuse

#### Raising Awareness

This will be achieved through:

- All new members of staff will receive safeguarding and prevent training as part of their induction programme, including training on the Safeguarding policy and procedures.
- All staff, including associates will be provided with appropriate training / updates regarding changes to safeguarding and prevent agendas.
- Providing updates and information to staff via appropriate communication channels.
- Providing information advice and guidance to employees and learners where appropriate.

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- Providing on-going adequate training to staff in relation to the safeguarding and prevent.
- Ensuring members of staff know the roles and responsibilities of the appointed people within the Safeguarding organisational structure
- Ensuring safeguarding procedures are in place and staff know where the procedures are located
- Ensuring staff awareness of the need for maintaining appropriate and professional boundaries in their relationships with vulnerable people, learner, parents, guardians and carers.

### Teaching and Learning

To provide a curriculum that promotes and develops knowledge and understanding of wellbeing, safeguarding, prevent and British Values. This will be achieved through:

- Encouraging active citizenship and learner voice.
- Promoting and reinforcing shared values, including British Values; creating space for free and open debate; and to listen and support the learner voice.
- Building the resilience of learners by undermining extremist ideology and supporting learner voice
- Embedding British Values, equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum.
- Promoting wider skills development such as social and emotional aspects of learning.
- Reviewing the curriculum and adapting to recognise local needs, challenge extremist narratives and promote universal rights.
- Teaching, learning and assessment strategies that explore controversial issues in a way that promotes critical analysis and pro-social values.
- Using external programmes or groups to support learning while ensuring that the input supports Company goals and values.
- Engaging all learners in playing a full and active role in wider engagement in society.

### Learner Support

To ensure that staff take preventative and responsive steps to provide a safe, secure and comfortable environment for learners to study and work

This will be achieved through:

- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Ensuring our learners are in a safe environment which is free from bullying, harassment and discrimination
- Developing community links and being aware of what is happening in the locality
- Recognising factors that may increase risk to a learner, i.e. vulnerability, disadvantage or hardship and implementing early risk management strategies
- Supporting 'at risk' learners through safeguarding processes
- Providing a safe space for learners
- Providing support for learners who may be at risk of radicalisation or harm, and appropriate sources of advice and guidance
- Establishing and maintaining an ethos where learners feel secure and are encouraged to talk, and are listened to
- Ensuring learners know that there are staff in the organisation that they can approach if they are worried or in difficulty

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## Managing Risks and Responding to Events

The Company will ensure that it monitors risks and is ready to deal appropriately with issues which arise through the following:

- Understanding the nature of threat from violent extremism and how this may impact directly and indirectly on the Company
- Identifying, understanding and managing potential risks within the Company from external influences
- Responding appropriately to events reported via local, national or international news that may impact on learners and communities
- Ensuring plans are in place to minimise the potential for acts of violent or non-violent extremism within the Company
- Ensuring measures are in place to respond appropriately to a threat or incident within the Company
- Continuously developing effective ICT security and responsible user controls and policies

## 12. Role of Safeguarding Partnerships/Boards

It is the duty of the local authority to make enquiries if it has reason to suspect that a child in its area is suffering, or likely to suffer significant harm, to enable it to decide whether it should take any action to safeguard or promote the child's welfare. This is referred to as the 'local authority's duty to investigate'. Each local authority has a Local Safeguarding Partnership or Board covering its area (refer to appendices 2 and 3), which brings together representatives of the main agencies and professionals responsible for helping to protect children from abuse.

### Local Safeguarding Partnerships/Boards - Children

Local Safeguarding Children's Partnerships/Boards are required to:

- Protect children from abuse and neglect
- Target policies and practice at those children who are suffering, or at risk of suffering significant harm
- Ensure that effective policies and working practices are in place to protect children and that they are properly co-ordinated
- Promote the welfare of all children

The objective of a Local Safeguarding Children's Partnership/Board is:

- To co-ordinate what is done by each person or body represented on the Partnership/Board for the purposes of Safeguarding and promoting the welfare of children in the area of the authority by which it is established
- To ensure the effectiveness of what is done by each such person or body for those purposes. (Section 32(1); Children Act 2004)

### Local Safeguarding Boards - Vulnerable Adults

The local authority also has a duty to develop and lead the implementation of multi-agency policies and procedures to protect vulnerable adults from abuse. They have robust procedures in place for dealing with incidents of abuse and to identify the next step forward in responding to the diversity of circumstances in which harm and exploitation occur to the at-risk group.

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### 13. Information Sharing and GDPR

The General Data Protection Regulations (GDPR) May 2018 does not prevent, or limit, the sharing of information for the purposes of safeguarding or keeping children and young people safe, whether internally or externally. Information sharing helps to ensure that an individual receives the right services at the right time and prevents a need from becoming more acute and difficult to meet.

HM Government, Information Sharing non-statutory guidance (July 2018), states that that neither the GDPR 2018 or the Data Protection Act 2018 prevents or limits the sharing of information to keep children safe. Paragraph 77 sets out the “Special Category Personal Data,” which allows sharing information even without consent, in some circumstances.

#### Responsibilities

- All staff have a duty to share information if there are concerns about a child’s safety or welfare, information should be shared with the Safeguarding team in line with the procedures outlined above.
- Safeguarding / Designated Persons will make decisions about how much information to share, with whom and when.

#### Sharing Information with third parties

GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or well-being of a child to be compromised. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns.

WE Care will follow the principles, as outlined in [HM Government Information Sharing non-statutory guidance \(July 2018\)](#) when making decisions in relation to sharing information with whom, how and when

#### Consent

Wherever possible, consent will be sought, and we will be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. Consent from the information subject is not necessarily needed to share their personal information. There may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person’s safety or well-being at risk.

Relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being. Where a decision to share information without consent is made, a record of what has been shared should be kept

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## 14. Associated Company Policies

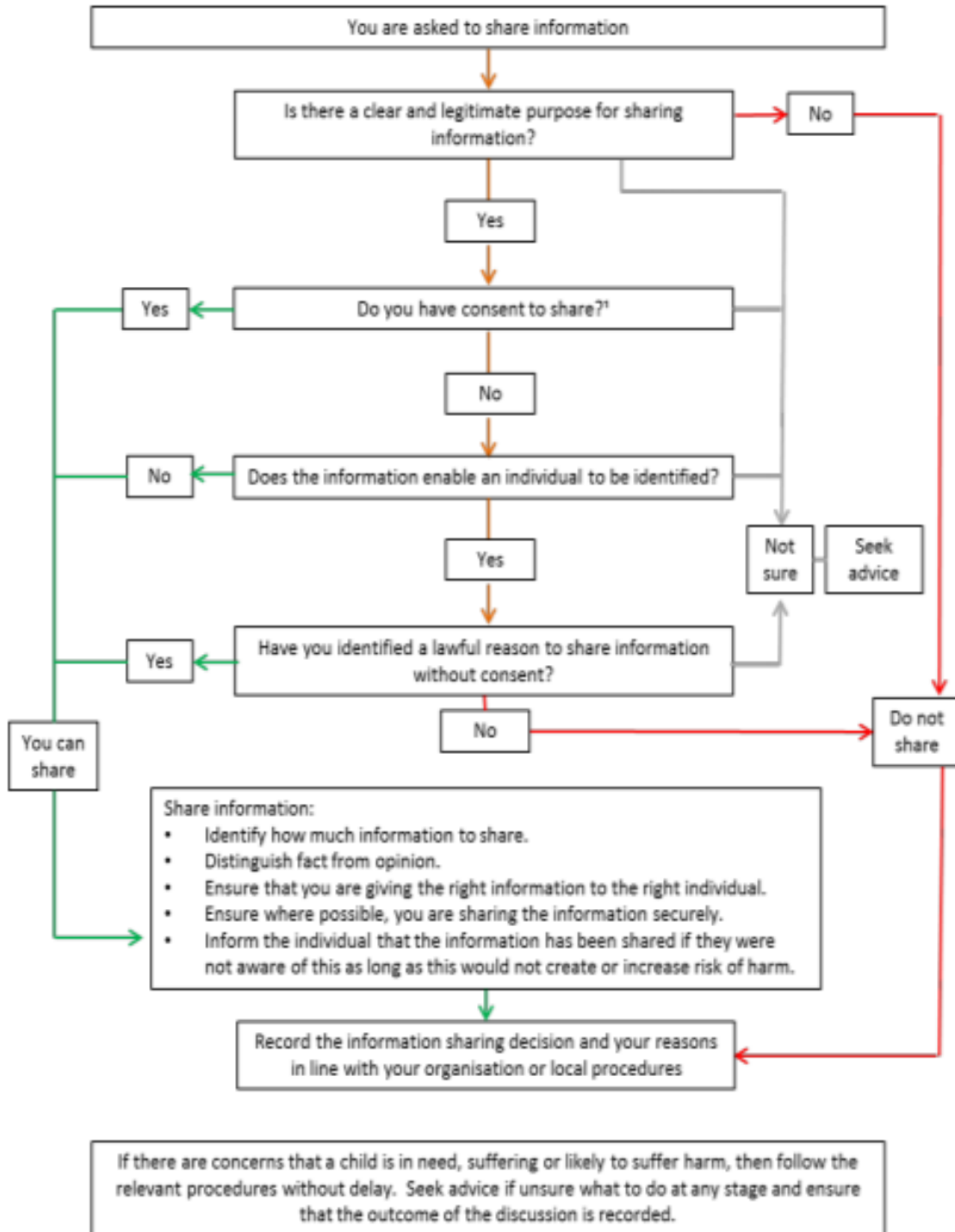
This policy should be used in conjunction with the following policies and procedures:

- Equality & Diversity Policy
- Health and Safety Policy;
- Whistleblowing Policy;
- Data Protection Policy;
- Internet Policy;
- Email Policy;
- Social Media Policy;
- Disciplinary Policy and Procedure
- Bullying, Harassment & Respect at Work Policy
- Grievance Procedure
- Recruitment Policy
- DBS Policy
- Critical Incident Management Policy
- U18 Onboarding Policy

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## 15. Appendix 1 Information Sharing Flow Chart

### Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

(Source: HM Government – Information Sharing July 2018)

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### 16. Appendix 2 Telephone contacts for safeguarding boards in Wales

<b>Cardiff and Vale of Glamorgan Safeguarding Board</b> Tel: 02922 330 880 / 02922 330 883 Email: CardiffandValeLSCB@cardiff.gov.uk Website: <a href="http://www.cardiffandvalersb.co.uk">www.cardiffandvalersb.co.uk</a>		
County	Child referrals	Adult referrals
Cardiff	Children's Access Point Tel 029 2053 6490 Out of Office Hours: Emergency Duty Team: 029 2078 8570	Cardiff Multi-Agency Safeguarding Hub (MASH): 02920 338439  Out of Hours: 02920 788570
Vale of Glamorgan	Intake and Family Support Team Tel 01446 725 202 Out of Office Hours: Emergency Duty Team 029 2078 8570	Vale of Glamorgan Adult Services: 01446 700111  Out of Hours: 02920 788570
<b>South East Wales Safeguarding Boards</b> Children Services: Website: <a href="http://www.sewsc.org.uk">www.sewsc.org.uk</a> Email: <a href="mailto:sewscb@caerphilly.gov.uk">sewscb@caerphilly.gov.uk</a> Adult Services: Website: <a href="http://www.gwasb.org.uk">www.gwasb.org.uk</a> Email: <a href="mailto:sewscbadmin@caerphilly.gov.uk">sewscbadmin@caerphilly.gov.uk</a>		
County	Child referrals	Adult referrals
Newport	Children and Family Services on 01633 656656 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Newport: Tel: 01633 656656 Outside of office hours Emergency Duty Team Tel: 0800 328 4432
Torfaen	Children and Family Service on 01495 762200 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Torfaen: Tel: 01495 762200 Outside of office hours Emergency Duty Team Tel: 0800 328 4432
Caerphilly	Children and Family Service on 0808 100 1727 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Tel: 0808 100 2500  Outside of office hours Emergency Duty Team Tel: 0800 328 4432
Blaenau Gwent	Children and Family Service on 01495 315700 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Tel: 01495 315700  Outside of office hours Emergency Duty Team Tel: 0800 328 4432
Monmouthshire	Children and Family Service on 01291 635669 After 5pm and on weekends and bank holidays contact Emergency Duty Team on 0800 328 4432.	Tel: 01291 638928  Outside of office hours Emergency Duty Team Tel: 0800 328 4432



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<b>CWM TAF Safeguarding Board</b> Tel: 01443 484 523 Email: <a href="mailto:cwmtafsafeguarding@rctcbc.gov.uk">cwmtafsafeguarding@rctcbc.gov.uk</a> Website: <a href="http://www.cwmtafsafeguarding.org">www.cwmtafsafeguarding.org</a>		
County	Child referrals	Adult referrals
Rhondda Cynon Taff	01443 425 006 Emergency Out of Hours: 01443 743 665	01443 425 003 Emergency Out of Hours: 01443 743 665
Merthyr Tydfil	01685 725 000 Emergency Out of Hours: 01443 743 665	01685 725 000 Emergency Out of Hours: 01443 743 665
<b>Western Bay Safeguarding Board</b> Tel: 01639 763021 Website: <a href="http://www.wbsb.co.uk">www.wbsb.co.uk</a>		
County	Child referrals	Adult referrals
Neath Port Talbot	Tel: 01639 686803 Out of Hours Emergency Duty Team : 01639 895455	Intake Team: 01639 686802
Swansea	01792 635700 Out of Hours Emergency Duty Team: 01792 775501	Intake Team: 01792 636519 Safeguarding Team 01792 636854
Bridgend	01656 642320 Out of Hours Emergency Duty Team: 01443 425012	Social Services: 01656 642279 Safeguarding Team 01656 642477
<b>Mid and West Wales Safeguarding Board</b> cysur@pembrokeshire.gov.uk for the Children Board cwmpas@pembrokeshire.gov.uk for the Adults Board Website: <a href="http://cysur.wales/home">http://cysur.wales/home</a>		
County	Child referrals	Adult referrals
Carmarthenshire	Central Referral Team: 01554 742322 Outside of Office Hours: Careline 01558 824283 & 0300 333 2222	IAA service on 0300 333 2222 Minicom on 01554 756741 SMS on 07892 345678
Ceredigion	Office Hours: Contact Centre Tel: 01545 574000 Outside of Office Hours Emergency Duty Team Tel: 0845 6015392	Office Hours: Contact Centre Tel: 01545 574000 Outside of Office Hours: Emergency Duty Team Tel: 0845 6015392
Pembrokeshire	Office Hours: Assessment Team Tel: 01437 776444 Outside of Office Hours: Emergency Duty Team Tel: 0300 333 2222	Office Hours: Duty Team Tel: 01437 776056 Outside of Office Hours: Emergency Duty Team Tel: 0300 333 2222
Powys	Tel: 01597 827666	Tel: 01597 827666
<b>North Wales Safeguarding Board</b> Regional Administration Officer to the Safeguarding Board Email: <a href="mailto:regionalsafeguarding@denbighshire.gov.uk">regionalsafeguarding@denbighshire.gov.uk</a> Tel: 01824 712903 Website: <a href="http://www.northwalessafeguardingboard.wales">www.northwalessafeguardingboard.wales</a>		

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County	Child referrals	Adult referrals
Anglesey	01248 752 722 01248 353 551 (Out of hours)	01248 752752 Out of Hours: 01286 675502 / 01248 384151
Gwynedd	01758 704 455 01248 353 551 (Out of hours)	Adults Department, Health and Wellbeing 01766 772577 Out of Hours 01248 353551
Conwy	Social Services: 0300 456 1111 Out of Hours: 01492 515777	0300 456 1111 Out of Hours 01492 515777
Denbighshire	01824 712200 Out of Hours: 0345 053 3116	0300 4561000 Out of Hours 0345 053 3116
Flintshire	01352 701 000 Out of Hours 0345 053 3116	01352 803444 Out of Hours 0845 053 3116
Wrexham	01978 292 039 Out of Hours 0345 053 3116	01978 292066 Out of Hours 0345 053 3116

### 17. Appendix 3 Telephone contacts for safeguarding boards/partnerships in England

West England Safeguarding Partnership/Board		
County	Child Referrals	Adult Referrals
Bristol	0117 9036444 Out of Hours: 01454 615165 Online: <a href="https://bristolsafeguarding.org/c/children-home/">https://bristolsafeguarding.org/c/children-home/</a>	0117 9222700 Out of Hours: 01454 615165 Online: <a href="https://bristolsafeguarding.org/adults/">https://bristolsafeguarding.org/adults/</a>
Bath & North Somerset	01225 396312/01225 396313 Out of hours: 01454 615165 Online: <a href="https://www.safeguarding-bathnes.org.uk/children">https://www.safeguarding-bathnes.org.uk/children</a>	0300 247 0201 Out of hours: 01454 615165 Online: <a href="https://www.safeguarding-bathnes.org.uk/adults">https://www.safeguarding-bathnes.org.uk/adults</a>
Birmingham	0121 303 1888 Out of hours: 0121 675 4806 Online: <a href="http://www.lscbbirmingham.org.uk/">http://www.lscbbirmingham.org.uk/</a>	0121 303 1234 Out of hours: 0121 675 4806 Online: <a href="https://www.bsab.org/">https://www.bsab.org/</a>
Gloucestershire	01452 426565 (Option 1) Out of hours: 01452 614194 Online: <a href="https://www.qscb.org.uk/">https://www.qscb.org.uk/</a>	01452 426868 Online: <a href="https://www.gloucestershire.gov.uk/gsab/">https://www.gloucestershire.gov.uk/gsab/</a>

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