

Safeguarding Policy- March 2022



**DEAL
ME
OUT**

Foreword

PURPOSE

Deal Me Out CIC are a not-for-profit organisation who is proud to deliver education, prevention and support surrounding gambling harms. We aim to raise awareness and provide education of gambling harms through workshops delivered to schools, businesses, public services, community, and faith groups.

We believe that all children and adults at risk regardless of age, gender, race, religion, disability, sexuality, culture of language should never experience abuse of any kind. We have a responsibility to promote the welfare of all children to keep them safe and to practise in a way that protects them.

The purpose of this policy statement is:

- To protect children and adults at risk, who receive Deal Me Out's services from harm. This includes the children of adults who use our services.
- To provide staff and volunteers, as well as children and their families, with the overarching principles that guide our approach to child protection.
- To protect adults at risk and their right to live in safety, free from abuse and neglect.
- To have a clear, well-publicised policy of zero-tolerance of abuse within the organisation.
- To ensure that our employees and volunteers respond to any safeguarding concerns and/or raise concerns with the appropriate local authority safeguarding team in an appropriate and timely manner.

SCOPE

The policy and procedures outlined do not form part of the contract of employment; however they do apply to all full and part time employees, including those employed on temporary and fixed term contracts. All staff are asked to make reading and understanding the policy a priority. This policy is publicly available on our website and will be reviewed annually. It will be amended as required; this may be before the annual review date however all staff members receive safeguarding and child protection updates via email and staff meetings as required.

All those under 18 years old are deemed to be children within the scope of safeguarding. For those older than 18 years, an adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (The Care Act, 2014).

We will seek to keep children, young people and adults at risk safe by:

- Valuing, listening to and respecting them
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- Making sure that children, young people and their families know where to go for help if they have a concern
- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Ensuring that we have effective complaints and whistleblowing measures in place

What is abuse and how do we recognise it?

Abuse is a form of maltreatment of a child or an adult at risk. Anybody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Types of abuse may overlap.

The following categories are based on the Working Together 2018 mandatory guidance published by the UK government and include the types of abuse that are directed towards children. They are neglect, physical abuse, sexual abuse and emotional abuse.

i. Neglect

Neglect is the persistent failure to meet a child's physical and/ or psychological needs which is likely to result in the impairment of the child's health or development. Neglect can occur in pregnancy however once a child is born neglect can involve a parent or carer failing to:

- a. provide adequate food, clothing and shelter
 - b. protect a child from physical and emotional harm or danger
 - c. ensure adequate supervision (including the use of inadequate caregivers)
 - d. ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

ii. Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

iii. Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

- The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

iv. Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.
- Serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Domestic Abuse

Domestic violence and abuse is Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are or have intimate partners or family members regardless of gender or sexuality.

This is not limited to, but can be; Psychological, Physical, Sexual, Financial, Emotional

Exposure to domestic abuse and/or violence can have a serious and long lasting emotional and psychological impact on children and young people.

Indicators of Abuse and Neglect

Our staff will look out for any of the following indicators and take the appropriate action. The child may:

- Show unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- Have an injury for which the explanation seems inconsistent
- Describe what appears to be an abusive act in which they were involved – verbally or in written form such as an essay or drawing
- Show unexplained changes in behaviour - e.g. becoming very quiet, withdrawn, or displaying sudden outbursts of temper or hysteria. Academic work may suddenly deteriorate
- Demonstrate age-inappropriate sexual awareness
- Engage in sexually explicit behaviour in games/PE or other areas
- Be distrustful of adults
- Have difficulty in making friends or be prevented from socialising with other children
- Showing signs of depression, self-injury, suicidal tendencies
- Not being taken to medical appointments
- Lose weight for no apparent reason
- Become increasingly dirty or unkempt, with inadequate or damaged clothing

Types of Abuse for Adults at risk

The following list is not intended to be exhaustive. It is important to remember that the following types of abuse may occur as a single or repeated act.

The Care Act 2014 recognises 10 categories of abuse in relation to adults at risk:

Physical Abuse - Including hitting, slapping, pushing, kicking, and deliberate misuse of medications, restraint or inappropriate sanctions.

Psychological or emotional abuse - Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, verbal abuse, isolation or withdrawal from supportive networks.

Sexual abuse - including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Neglect and acts of omission - Ignoring medical and/or physical care needs, failure to provide access to health, social care or educational services, withholding necessities of life, e.g. medication, adequate nutrition and heating.

Modern slavery - Modern Slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude.

Self-neglect - Self-neglect covers a wide range of behaviour, neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Financial or material abuse - Including theft, fraud, and exploitation – Wills, property, inheritance, possessions or benefits.

Discriminatory abuse - Unacceptable behaviour directed towards an adult at risk including harassment, slurs or similar treatment or because of race, gender and gender identity, age, disability, sexual orientation, religion.

Organisational abuse - Including neglect and poor care practice within an institution or specific care setting. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. Organisational abuse is the mistreatment, abuse or neglect of an adult by a regime or individuals in a setting or service where the adult lives or that they use.

Domestic violence and abuse - are any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial or emotional and includes the more recent offence of coercive and controlling behaviour in intimate and familial relationships closes a gap in the law around patterns of coercive and controlling behaviour during a relationship between intimate partners, former partners who still live together.

Financial or material abuse - includes having money or other property stolen, being defrauded, being put under pressure in relation to money or other property and having money or other property misused.

Other types of abuse

Not included in the Care Act 2014 but also best practice principles:

Forced Marriage - forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

Honour Based Abuse - The concept of 'honour' is for some communities deemed to be extremely important. To compromise a family's 'honour' is to bring dishonour and shame and this can have severe consequences. The punishment for bringing dishonour can be emotional abuse, physical abuse, family disownment and in some cases even murder.

Female Genital Mutilation - is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done.

Cyber Bullying - cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it

Mate Crime/Cuckooing - a 'mate crime or cuckooing as it is often referred is defined by the Safety Net Project as 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been a number of Serious Case Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Radicalisation - can be defined as the process by which people come to support terrorism and violent extremism, and in some cases participate in terrorist groups and activities. Violent extremists often use a persuasive rationale and charismatic individuals to attract people to their cause. The aim is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media. There is no clear profile of a person who is more likely to become radicalised. The process of radicalisation varies from person to person, as does the timescale of the radicalisation process. However, there are some factors that may make an individual susceptible to exploitation by violent extremists, for example identity or personal crisis, unemployment or underemployment, family or friends involved in extremism and relevant mental health issues. None of these factors should be considered in isolation but in conjunction with the particular circumstances of the individual.

The PREVENT strategy was launched by the Home Office in 2011. Prevent is part of the Government's counterterrorism strategy CONTEST and aims to provide support and re-direction to adults at risk of being groomed into terrorist activity before any crimes are committed. Disrupting terrorist activity, preventing radicalisation and supporting those vulnerable to becoming involved in violent extremism is a shared responsibility under Prevent and its related safeguarding element known as Channel. Since 1 July 2015 the Counterterrorism and Security Act 2015 places a duty on certain bodies to have 'due regard to the need to prevent people from being drawn into terrorism'.

Responding to a disclosure

In the instance that an individual makes a disclosure to a member of staff, our staff are required to:

- Listen to the individual and allow them to freely recall significant events, without asking leading questions.
- Reassure the individual but tell them that a record of the information given will be made and do this. Include times, settings and others present. Record the presentation of the child as well as what is said.
- Explain that they cannot promise to keep confidential anything that is said if the matter is related to child protection or abuse.
- Explain that help may be required to keep them safe, but do not ask the child to repeat their account of events to anyone else.
- Recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so they may not be able to recall all details or timeline of abuse.
- Keep in mind that certain individuals may face additional barriers to telling someone because of their disability, gender, ethnicity and/or sexual orientation.
- Reflect back, using the individual's language, when hearing a report.

Key principles for safeguarding adults at risk

Under the Care Act there are six key principles which define how we deal with safeguarding in relation to adults at risk. Deal Me Out CIC will always use these to inform practice:

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** – It is better to take action before harm occurs.
- **Proportionality** – The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

Capacity and Consent

It is important to be alert to issues of cognitive capacity which can increase the vulnerability of people where they have a reduced ability to make informed decisions in the moment. This may be transient (e.g. due to fear, shock, injury, illness) or long term (e.g. due to learning differences, disability, mental health issues).

Whilst this is a complex issue, it should not get in the way of staff and volunteers genuinely seeking to ensure that all individuals are respectfully consulted in relation to participation in activities and/or sharing of information about them.

A young person aged 16 or older is presumed in law to have capacity to consent, unless there is evidence to the contrary. Capacity to consent is not simply based on age however, particularly where learning and communication difficulties and disabilities are identified. You should also consider a person's capacity to understand the consequences of giving or withholding their consent. They should not be treated as unable to make a decision until all practicable steps to help them have been taken.

When assessing a person's understanding you should seek to explain the issues using their preferred mode of communication and language. This should be done in a way that is suitable for them, considering all you know about them from your contact with them, particularly their age, language and likely understanding.

It is important to try and ensure that they really understand the issues and are not just agreeing to what is proposed. If you are unsure whether they have the capacity to consent, then you should seek advice from your line manager or the NSPCC Helpline staff (0808 800 5000), The person's friends, carer, another professional working with them, or an advocate, where available, may be able to provide relevant information or advice where consulting these people does not increase potential risks.

The following criteria should be considered when assessing whether a person has sufficient understanding at any time to consent, or to refuse consent, to sharing of information about them or participating in specific activities:

- Can the person understand the question being asked of them?
- Are they taking an active part in the discussion?
- Can they rephrase the question in their own words?
- How would they explain it to someone else?
- Do they have a reasonable understanding of what the risks or benefits of giving their consent or saying no?
- What do they say they think would happen if they agree the action being suggested?

Reporting Safeguarding Concerns

A safeguarding concern is brought to the attention of a staff member

If there is an immediate risk of harm the Police should be called on 999 or Local Authority Social Care Duty Team

Where staff are visitors at another organisation. Alert the designated safeguarding lead for that establishment.

Where Deal Me Out CIC are the host. i.e online sessions, the Head of Community Development and Engagement (HOCDE) must be notified. Where the HOCDE is not available, staff must notify their line manager.

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Mandatory Reporting

Female genital mutilation (FGM)

It is illegal to carry out FGM in the UK. It is also a criminal offence for UK nationals or permanent UK residents to perform FGM overseas or take their child abroad to have FGM carried out.

In England and Wales, regulated health and social care professionals and teachers must make a report to the police, if, in the course of their duties:

- they are informed by a child under the age of 18 that they have undergone an act of FGM
- they observe physical signs that an act of FGM may have been carried out on a child under the age of 18.

In Wales, professionals who identify cases of FGM need to make a report to both the police and the local authority.

Duty to report in Wales

"Relevant partners" are required to inform the local authority if they have reasonable cause to suspect a child within the local authority's area is at risk of experiencing abuse, neglect or other types of harm. This includes people who work for the local authority such as teachers and social work practitioners, health practitioners, the police, probation services and others.

Reporting Concerns about a member of staff

Concerns arise about behaviour or conduct of a staff member

The concern must be brought to the attention of HOCDE. If the concern is about the HOCDE, staff must report to the CEO

Decision made that it is poor practice or a Breach of Code of Conduct

Possible abuse of a child/ criminal offense

Outcome of disciplinary decided- no further action, training, dismissal, warning, sanctions

HOCDE makes a call to Police or Social Care

In association with LADO, HR procedures commence and suspension is considered

Transferable Risk

Where a member of staff or volunteer is involved in an incident outside of work which did not involve children but could have an impact on their suitability to work with children, we will consider the risk involved with their daily responsibilities.

Safer Recruitment

Deal Me Out CIC will prevent people who pose a risk of harm by adhering to statutory responsibilities and checking our staff using the Disclosure and Barring Service. We take proportionate decisions on whether to ask for any checks beyond what is required and ensure volunteers are appropriately supervised. At least one member of the interview panel will be safer recruitment trained. In addition, an induction will be completed with all staff which will include familiarisation with this policy and their individual safeguarding responsibility.

Photography and Consent

Deal Me Out CIC are committed to providing a safe environment for vulnerable groups to participate in our workshops. Our failure to identify children who are looked after, adopted or fleeing domestic violence at risk of harm could result in them having to move to keep them safe. Essential to this commitment, is to ensure that all necessary steps are taken to protect them from the inappropriate use of photographic images

Deal Me Out CIC will not accept from staff:

- The inappropriate use, adaptation or copying of images for use on child abuse websites on the internet;
- The identification of children when a photograph is accompanied by significant personal information that will assist a third party in identifying the child
- The identification and location of children in inappropriate circumstances.
- Using personal mobile phones during sessions to take photographs
- Pictures taken during sessions on their own personal social media sites, photographs must only be used on the official Deal Me Out site or social media pages

Deal Me Out CIC will ensure they are always following good practice guidelines:

- Using a Consent Form, we will ask for the permission of young people and their carers to take and use their image;
- If a photograph is used, we will avoid naming the person or just use a first name;
- We will never publish personal details (email addresses, telephone numbers, addresses, etc.) of a vulnerable person;
- Include the following statement on our websites:” Further use of any of the images on this site is forbidden”;
- We will be clear about how and for how long images will be securely stored.