



Safeguarding Policy

Application of Policy

1. This policy sets out the Police and Crime Commissioner's approach to safeguarding and promoting the welfare of children and vulnerable adults. It applies to all aspects of our work and to everyone working for the OPCC including permanent and temporary employees, contractors, self-employed contractors and anyone working on behalf of or undertaking work or volunteering for the OPCC. The OPCC expects all staff, contractors and volunteers to co-operate fully in the achievement of this policy. The policy includes particular references to the activities of the projects and people working with the Violence Reduction Unit (VRU).

Introduction to the VRU

2. The VRU is a partnership organisation that aims to reduce violence and exploitation across the West Midlands Metropolitan Region. It benefits from the expertise of partners in Public Health, Local Authorities, Criminal Justice, Sports, Education and Policing.
3. The VRU directly deliver and commission a range of interventions across the region. Our intention is to influence and improve whole system responses across organisations, understanding the way in which processes and approaches to serious violence can be improved and risks reduced. The 5 strands to the VRU's work include supporting:
 - Communities and professionals to work together
 - Interventions to prevent violence
 - The use of evidence to inform decisions
 - Leaders to connect around a shared long-term ambition
 - Production of guidance, advice and toolkits
4. We are fully committed to safeguarding the welfare of children and vulnerable adults and recognise our responsibility to take all reasonable steps to promote safe practice and to protect children and vulnerable adults from significant harm. We recognise our duty to respond appropriately to any allegations, reports or suspicions of abuse.
5. The welfare of children and vulnerable adults is paramount and as part of our responsibilities, we will ensure that any safeguarding issues that are encountered as part of the VRU's work and the work we commission, are handled in accordance with the policy.

Purpose of the Policy

6. This policy sets out the Commissioner's approach to safeguarding and promoting the welfare of children and vulnerable adults. It applies to all aspects of our work and to everyone working for us including seconded, temporary and permanent staff, contracts, self-employed contractors and anyone working on behalf of or undertaking work or volunteering. All parts of this policy apply to the entire Office of the Police and Crime Commissioner (OPCC). We expect all staff, contractors and volunteers to co-operate fully with this policy as well as their own/host organisational policies and procedures where appropriate.
7. Children and vulnerable adults have the right to be protected from harm. We believe that no child, young person or vulnerable adult should experience abuse or harm and we are committed to robust safeguarding practices. Both the OPCC and the VRU directly deliver and commission services to a



range of communities and this policy is intended to provide guidance and overarching principles to those who represent them, and also sets out our expectations of those services we commission via grants and/or contracts.

8. Commissioned providers will be required to have effective policies and procedures to deal with the safeguarding of children and vulnerable adults. There will be a requirement to notify the OPCC and VRU immediately of any incidents in which any beneficiaries or service users of the project are harmed or placed at risk of harm in addition to their local safeguarding reporting/notification requirements. In addition, providers must notify the OPCC and VRU of any safety incidents in relation to VRU funded provision; any adverse findings, warning notices, interventions or other regulatory action from any regulator; any loss of consent, approval or licence that has a material adverse impact on the provider's ability to deliver the project/service; and/or any incident or event of any kind that might bring the provider and/or OPCC/VRU by virtue of its relationship with the provider, into disrepute.

Examples of VRU or OPCC business which could be impacted by safeguarding Commissioning

9. As a commissioner of services, the VRU and OPCC will ensure that any services we commission from third parties are compliant with the legal duty to safeguard and promote the welfare of children and adults according to Government Guidance: [Working Together to Safeguard Children 2018](#), [Keeping Children Safe in Education 2021](#) and the [Care Act 2014](#). All delivery partners will be expected to have in place a robust safeguarding policy which will specifically but not exclusively include:
 - A senior lead with the required knowledge, skills and expertise or sufficiently qualified and experienced to take leadership responsibility for the organisation's safeguarding arrangements
 - A culture of listening to children and vulnerable adults and taking account of their wishes and feelings, both in individual decisions and the development of services
 - Clear whistleblowing procedures which are clearly referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children and vulnerable adults to be addressed
 - Clear escalation policies for staff to follow when their safeguarding concerns are not being addressed within their organisation or by other agencies
 - Arrangements which set out clearly the processes for sharing information, with other professionals and with safeguarding partners
 - Safe recruitment practices for individuals whom the organisation will permit to work regularly with children and vulnerable adults, including policies on when to obtain Disclosure and Barring Service (DBS) checks
 - Appropriate supervision and support for staff, including mandatory safeguarding training and agreed intervals for refresher training
10. **Direct Work** – we will take all reasonable steps to ensure concerns raised through our involvement in direct work are dealt with in accordance with child and vulnerable adult safeguarding procedures. In the first instance all concerns will be discussed with the appropriate Designated Safeguarding Lead (details set out at the end of this policy). If appropriate, a referral to the relevant child/adult safeguarding service will be made and where appropriate the police will be notified.



11. **Volunteers/Work Experience** – where concerns arise as a result of issues raised by volunteers or work experience students, they will be responded to in line with this policy.

The Risks to Children

12. While employees, contractors and self-employed contractors and volunteers are likely to have varied levels of contact or exposure to potential safeguarding issues including contacts and correspondence with children, young people and vulnerable adults as part of their duties and responsibilities for the OPCC or VRU, everyone should be aware of the potential indicators of abuse and neglect and be clear about what to do if they have concerns. There are situations where children and vulnerable adults need protection including but not limited to:
- Sexual abuse
 - Grooming
 - Physical and emotional abuse and neglect
 - Domestic abuse
 - Inappropriate supervision by staff or volunteers
 - Bullying, cyber bullying, acts of violence and aggression in public spaces
 - Victimisation
 - Self-harm
 - Unsafe environments and activities
 - Crime
 - Exploitation

Equalities and Universality of Protection

13. The OPCC and VRU are committed to the principles of equality and diversity. No member of the public, member of staff, contractor, volunteer or job applicant shall be discriminated against on the grounds of age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; or sexual orientation.
14. The OPCC and VRU recognise that:
- the welfare of children, young people and vulnerable adults is paramount;
 - all children, young people and vulnerable adults regardless of race, gender, religious belief, disability, age, sexual orientation or identity have a right to equal protection from harm;
 - some children, young people and vulnerable adults are more vulnerable to harm as a result of their circumstances, prior experiences, communication needs or level of dependency; and
 - working with children, young people and vulnerable adults, families or other agencies is essential to protecting their wellbeing.

Legislation

15. This policy has been written in line with and is fully compliant with all relevant safeguarding legislation including:
- Children Act 1989
 - United Nations Convention on the Rights of the Child
 - Children Act 2004
 - Care Act 2014
 - Working Together to Safeguarding Children 2018
 - Mental Capacity Act
 - General Data Protection Regulations
 - Data Protection Act 20



Definitions

16. We use definitions of the term 'safeguarding' from statutory guidance. Safeguarding children is defined in [Working together to safeguard children 2018](#) as:
- Protecting children from maltreatment
 - Preventing impairment of children's health or development
 - Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes
17. Safeguarding vulnerable adults is defined in the [Care and support statutory guidance](#) issued under the Care Act 2014 as:
- Protecting the rights of adults to live in safety, free from abuse and neglect
 - People and organisations working together to prevent and stop both the risks and experience of abuse or neglect
 - People and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
 - Recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing

Confidentiality/Consent

18. All information shared relating to safeguarding will remain confidential unless there is a need to inform safeguarding agencies who will need to act on the information. Consent to share should be requested unless there is a compelling reason for not doing so. Information can be shared without consent if it is justified in the public interest or required by law. Do not delay disclosing information to obtain consent if that might put children or young people at risk of significant harm. Get advice from the OPCC or VRU Designated Safeguarding Leads (details set out at the end of this policy) if you are not sure what information to share, who to share it with or how to best manage any risks associated with sharing information.

Responsibilities

19. The Senior Management Teams (SMT) of the OPCC and the VRU are responsible for ensuring that this policy is implemented, monitored and consistently reviewed.
20. The VRU Director is responsible for informing the Home Office of any critical incidents or matters arising the outcome or consequence of which is likely to result in
- a. Serious harm to any individual or group; or
 - b. Significant community impact; or
 - c. Significant impact on public confidence
21. A report must be made within one calendar day. In addition, a follow up report within three Calendar Days must be provided re. how the matter has been resolved or whether the Home Office will need to intervene.
22. All OPCC and VRU staff (seconded, co-located and employed) have responsibility to follow the guidance laid out in this policy and related policies and to pass on any welfare concerns using the



required procedures. Individuals will also have a responsibility to understand and comply with their host/own organisational policies and procedures.

23. We expect all staff (seconded/employed) representing the OPCC or VRU to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.
24. All staff are expected to comply with this policy and failure to do so may be deemed as misconduct and managed through the established performance management and capability processes.

SMT has responsibilities to:

- Ensure the policy is in place and appropriate and accessible
- Ensure the policy is implemented, monitored and reviewed
- Ensure sufficient resources (time and money) are allocated to ensure that the policy can be effectively implemented
- Promote the welfare of children, young people and vulnerable adults
- Ensure staff have access to appropriate training and information
- Receive staff concerns about safeguarding and respond to all seriously, swiftly and appropriately

Individuals representing the OPCC or VRU are responsible for:

- Reading the policy and regularly reflecting on how it informs practice
- Contributing to regular review and improvement of the policy
- Ensuring a sound understanding and application of the policy
- Consulting with the Designated Safeguarding Lead if they are in a position where they are unsure what to do
- Complete mandatory safeguarding training and ensure participation in available refresher safeguarding training
- Alerting their line manager as quickly as possible if they've concerns about the behaviour of a colleague

Designated safeguarding leads will

- Provide a point of contact for serious safeguarding concerns that need to be escalated
- Maintain a log of escalated incidents so that we can tell how many and what type of safeguarding incidents we encounter
- Provide advice to staff when required

Contracts and grant aid agreements will include clear minimum requirements for and evidence of robust safeguarding practices and procedures.

Individuals/Organisations working on behalf of the OPCC or VRU via contracts or grants will:

- Confirm that they hold robust safeguarding policies and procedures and provide evidence if requested to do so
- Conduct systematic checking of safeguarding arrangements
- Immediately alert the OPCC and VRU to safeguarding risks or relevant and significant safeguarding reports
- Report on any safeguarding notifications/issues in quarterly monitoring meetings



Recruitment

25. We are committed to safer recruitment procedures. All recruitment adverts or application details will include the following statement – ‘recruitment is done in line with ‘safe recruitment practices’
26. As vacancies occur we will work towards ensuring that all job or role descriptions and person specifications for all roles will contain reference to safeguarding responsibilities.
27. DBS and Police checks will be carried out for all roles and no formal job offers will be made until after checks for suitability have been completed.
28. A 3 year rolling programme will be in place for re-checking DBS’s.

Communications, Training and Support for Staff

29. We commit resources for induction, training of staff, effective communication of relevant policies and support mechanisms in relation to safeguarding. Mandatory safeguarding training will be a key part of the induction process and a variety of mechanisms will be used to facilitate discussion of safeguarding issues including 1:1s, team meetings, etc. All staff in the OPCC and VRU who hold frontline positions will be required to complete annual refresher training. For OPCC staff not deemed to be in frontline positions, refresher training will be once every three years.
30. Staff support mechanisms include opportunities to debrief so that they can reflect on issues they may have dealt with, seeking further support as appropriate, etc

Allegations against staff or contractors

31. As a public funded body, we expect high standards from all of employees and aspires to the highest standards of excellence and professionalism from the people representing the OPCC or VRU.
32. Concern may be raised if a member of staff is behaving in a way which demonstrates unsuitability for working with children or vulnerable adults in their present position, or in any capacity.
33. Allegations or concerns may arise either in their work or private life. Examples include but are not limited to:
 - Commitment of a criminal offence against or related to children or vulnerable adult
 - Behaving towards children or vulnerable adults in a manner that indicates they are unsuitable to work with them
 - Where an allegation or concern arises about a member of staff from their private life such as perpetration of domestic abuse or where inadequate steps have been taken to protect vulnerable individuals from the impact of violence or abuse
 - Where an allegation of abuse is made against someone closely associated with a member of staff such as a partner, member of the family or other household member.
34. In such cases the safety of the child and vulnerable adult at risk is of paramount importance. Immediate action may be required to safeguard them.
35. Any concern that the child or vulnerable adult may be at risk of harm or abuse must be immediately reported.



36. Within VRU the concern will be reported to the VRU Director and the VRU Designated Safeguarding Lead (details set out at the end of this policy) who in the first instance will take advice from the relevant Local Authority Designated Officer (LADO). A police investigation of a possible criminal offence may be required and if appropriate, disciplinary action/suspension pending investigation will be considered.
37. Within the OPCC the concern will be reported to the designated safeguarding lead (details at the end of this document).

Acting on Safeguarding Concerns

38. No one working for the OPCC or VRU should investigate concerns about individual children or vulnerable adults who are or may be being abused or who are at risk. However, we all have a responsibility to make sure that concerns about children and vulnerable adults are passed to the agency that can help them without delay.
39. If anyone is concerned that a child or vulnerable adult is at risk of being abused or neglected, they should not ignore their suspicions and should not assume that someone else will take action to protect that person. Concerns about children should be referred to the relevant Children's Multi-Agency Safeguarding Hub in the local authority area where the child lives. Similarly, concerns about vulnerable adults should be referred to the relevant local authority adult social care safeguarding service. Although the police have a role in an emergency situation, they should not be the first route for reporting.
40. If anyone finds themselves in a position where they are unsure what to do, they should consult with the Designated Safeguarding Lead and in their absence, the VRU Director or the Deputy Chief Executive of the OPCC.
41. Anyone who has concerns about the behaviour of a colleague must always raise this with their line manager as quickly as possible.

Dealing with Disclosures

42. If a child/vulnerable adult tells you they are being abused you should:
- Show them you have heard what they have said and that you take the allegation seriously
 - Encourage them to talk but not ask leading questions as this could be seen as corruption of evidence
 - Not interrupt when they are recalling events and not ask them to repeat their account
 - Explain to them what you will need to do with this information
 - Not promise to keep what has been disclosed a secret as you have a duty to report it
 - Record everything they tell us as accurately as possible using the exact words if possible and send it to your Designated Safeguarding Lead
 - Follow the local safeguarding partnership procedures for the local authority area where the child lives
 - Inform the LADO in cases of professional misconduct
 - In an emergency call the Police
43. You should not:



- Confront the alleged abuser
- Ask leading questions or try to investigate
- Discuss with the parent if the allegation relates to them
- Promise to keep it a secret
- Assume somebody else is dealing with it

Safeguarding procedure

44. If someone mentions a risk to themselves or someone else (including a vulnerable adult or child) you should:
- I. Identify where the person lives, get address of current location and circumstances of risk, giving the advice that you will be getting support. Try to gain consent if you are able but you also have the duty to refer even if consent is not given.
 - II. If there is an immediate risk to life call 999 and arrange for the force to complete a safe and welfare check.
 - III. This should be followed up by a referral either to adult/child safeguarding, referrals are made to the local authority in which the person resides and should be made immediately.
 - IV. Speak to the DSL so this can be logged and any follow up actions discussed.

Process for Review

45. This policy will be reviewed every 2 years to ensure it is up to date with good practice and relevant guidance and legislation.

VRU Designated Safeguarding Lead:

Nadyia Hussain – n.hussain@west-midlands.pnn.police.uk

OPCC Designated Safeguarding Lead (external):

Jennifer Alder – j.alder@west-midlands.pnn.police.uk

OPCC Designated Safeguarding Lead (staff):

Lucy Naylor – lucy.naylor@west-midlands.police.uk

SMT leads

VRU Director

Clare Gollop – c.gollop@west-midlands.pnn.police.uk

OPCC Head of Business Services

Andrea Gabbitas – andrea.gabbitas@west-midlands.police.uk

OPCC Deputy Chief Executive

Alethea Fuller – a.fuller@west-midlands.pnn.police.uk