



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. The OPCC workforce includes permanent and temporary employees, secondments, self-employed contractors and volunteers. The OPCC expects all staff, self-employed contractors and volunteers to co-operate fully in the achievement of this policy.
2. It contains the relevant information and training guidance available to support all staff, self-employed contractors and volunteers to understand their roles and responsibilities regarding safeguarding, and includes particular reference to the commissioning of services and activities of projects and people working in community settings.
3. The policy includes particular references to the activities of the projects and people working with the West Midlands Violence Reduction Partnership (VRP); funded by the Home Office, the VRP is an organisation hosted within the OPCC, that focuses directly on tackling serious violence across the region.

Introduction to the VRP

4. The VRP 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.
5. They directly deliver and commission a range of interventions across the region, with the intention 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. In addition to the implementation of the Serious Violence Duty across the West Midlands, as outlined in the WMVRP Response Strategy 23-26, the VRP has five strategic priorities:
 - i. Influence systems to deliver prevention across the life course
 - ii. Development of a sustainable, community and youth led approach to violence reduction
 - iii. Building regional and local partnerships that enhance collaboration and innovation
 - iv. Development of a West Midlands wide movement that aims for a violence free region
 - v. Influence delivery of evidence based programmes in education settings
6. The VRP 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.
7. 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 VRP's work and the work we commission, are handled in accordance with the policy.



Purpose of the Policy

8. 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, 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), which includes the VRP. 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.
9. 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 VRP directly deliver and commission services to a range of communities, and this policy is intended to provide guidance and outline overarching principles to those who represent them (i.e. contracted staff, volunteers etc), and also sets out our expectations of those services we commission via grants and/or contracts.
10. 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 VRP 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.
11. In addition, providers must notify the OPCC and VRP of any safety incidents in relation to VRP 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/VRP by virtue of its relationship with the provider, into disrepute.

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

12. As a commissioner of services, the VRP 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 vulnerable 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 are expected to have in place a robust safeguarding policy for both children and vulnerable adults 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.
 - Recording and storing and using information professionally and securely, in line with the [Information Governance Policy](#) Clear whistleblowing [policy](#) and 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.

Direct Work

13. 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.

Volunteers/Work Experience

14. 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

15. While employees, 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 VRP, 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 - Victimization
- Self-harm
- Unsafe environments and activities
- Crime
- Exploitation

Working together/Care Act

- Physical abuse
- Sexual abuse



- Psychological (emotional) abuse
- Financial abuse
- Domestic abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational abuse
- Neglects and acts of omission
- Self-neglect

WMP Vulnerabilities thematics

- Exploitation including sexual exploitation and criminal exploitation
- Child abuse
- Domestic abuse
- Stalking and harassment
- Rape and other sexual offences
- Modern Slavery/Human Trafficking
- So-called Honour based abuse
- Forced Marriage
- Female Genital Mutilation
- Grooming and radicalisation
- Sex work
- Missing people
- Mental health
- Hate Crime

Further links to case studies which can support teams to understand the complexity of abuse and interactions between different abuse types and how they can impact an individual can be found via [Annex A](#).

Equalities and Universality of Protection

16. The OPCC and VRP 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.

17. The OPCC and VRP 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

18. 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](#)
- [Working Together updated guidance – 2024 eta.](#)
- [Mental Capacity Act 2005](#)
- [Mental Health Act 1983](#)
- [Human Rights Act 1998](#)
- [General Data Protection Regulations](#)
- [Data Protection Act 2018](#)
- [Children and Social Work Act 2017](#)

Definitions

19. 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

20. 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

21. 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 VRP 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

22. The Senior Management/Leadership Teams (SMT/SLT) of the OPCC and the VRP are responsible for ensuring that this policy is implemented, monitored and consistently reviewed.
23. The VRP 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
- Serious harm to any individual or group; or
 - Significant community impact; or
 - Significant impact on public confidence
24. A report ([Annex B](#)) 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.
25. All OPCC and VRP 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.
26. We expect all staff (seconded/employed) representing the OPCC or VRP to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.
27. 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. ([See Annex C](#))

SMT/SLT 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
- Ensure evaluation of Safeguarding processes and practice take place annually

Individuals representing the OPCC or VRP 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 or the HR 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
- Meet bi monthly for the purposes of shared learning and reflection

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 VRP 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 VRP to safeguarding risks or relevant and significant safeguarding reports
- Report on any safeguarding notifications/issues in quarterly monitoring meetings

Recruitment

28. 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'***

29. 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.

30. 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.



31. A 3 year rolling programme will be in place for re-checking DBS's.

Communications, Training and Support for Staff

32. 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 VRP will be required to complete annual refresher training.

33. 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

34. As a public funded body, we expect high standards from all of employees and aspire to the highest standards of excellence and professionalism from the people representing the OPCC or VRP.

35. Concern may be raised if a member/s of staff, self-employed contractors or volunteers behave in a way which demonstrates unsuitability for working with children or vulnerable adults in their present position, or in any capacity.

36. 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/s of staff such as a colleague, partner, member of the family or other household member.

37. 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.

38. Any concern that the child or vulnerable adult may be at risk of harm or abuse must be immediately reported.

39. Concerns will be reported to the Designated Safeguarding Lead (details set out at the end of this policy) who in the first instance, where necessary 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.



40. Within the OPCC the concern will be reported to the Designated Safeguarding Lead (details at the end of this document).

Acting on Safeguarding Concerns

41. No one working for the OPCC or VRP 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.

42. 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.

43. 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 VRP Director or the Deputy Chief Executive of the OPCC.

44. Anyone who has concerns about the behaviour of a colleague must always raise this with their line manager or the HR Manager as quickly as possible.

Dealing with Disclosures

45. 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

46. 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

47. 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 police to complete a safe and welfare check.
- III. This should be followed up by a referral either to adult/child safeguarding services; referrals are made to the local authority in which the person resides, and should be made immediately
- IV. Speak to the relevant OPCC/VRP DSL so this can be logged and any follow up actions discussed.

Process for Review

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

Designated Safeguarding Leads

Senior Management Team Leads

OPCC Deputy Chief Executive:

Alethea Fuller – alethea.fuller@westmidlands.police.uk

VRP Director:

Sara Roach – sara.roach1@westmidlands.police.uk

OPCC Head of Business Services:

Andrea Gabbitas – andrea.gabbitas@westmidlands.police.uk

VRU Designated Safeguarding Lead:

Charlotte Lomas - charlotte.lomas@westmidlands.police.uk

OPCC Designated Safeguarding Lead (external):

Amber Hunt - amberlily.hunt@westmidlands.police.uk

OPCC Designated Safeguarding Lead (volunteers):

Jenson Bloomer – jenson.bloomer1@westmidlands.police.uk



OPCC Designated Safeguarding Lead (staff):

Lucy Naylor – lucy.naylor@westmidlands.police.uk

Where to report concerns, find help, advice and support:

- Immediate risk of harm – always 999
- **Abuse or neglect – follow local guidance**, e.g. referral to MASH or LA safeguarding team
- **High risk domestic violence (including HBV and stalking)** – MARAC
- **Crime** – Police
- **Modern Slavery Guidance:** [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK \(www.gov.uk\)](#)
- **Forced Marriage Guidance:** [Forced marriage - GOV.UK \(www.gov.uk\)](#)
FGM Guidance: [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](#)

Annex A – Resources relating to the complexity of abuse

Further links to case studies which can support teams to understand the complexity of abuse and interactions between different abuse types and how they can impact an individual can be found via the Operation Sentinel homepage - [Sentinel - Home \(sharepoint.com\)](#)

Annex B – VRP Safeguarding Incident Form

[Safeguarding - Critical Incident Template - Final \(Updated April 2024\).docx \(wmpad.local\)](#)

Annex C – Table of Responsibilities (please see below).



OPCC/VRP SAFEGUARDING - STAFF RESPONSIBILITIES

All Staff Representing the OPCC	SMT/SLT	Safeguarding Leads	Individuals/organisations working on behalf of the OPCC/VRP via contracts or grants
Read the policy regularly and reflect how this informs practice.	Ensure all staff are following correct Safeguarding procedures	Act as the main contact for concerns that need to be escalated	Confirm that they hold robust safeguarding policies and procedures, as highlighted in our contracts and within the conditions of grant agreements
Act as First Responders - demonstrate safe practice; recognise and report signs of abuse and neglect appropriately.	·Ensure the policy is implemented, monitored and reviewed. SMT are accountable for evaluating the OPCC/VRP safeguarding process annually.	Provide advice on referrals and partnership working	Conduct systematic checking of safeguarding arrangements
Draft Risk Assessments	Receive staff concerns about safeguarding and respond to all seriously, swiftly and appropriately	Sign off Risk Assessments	Immediately alert the OPCC and VRP to safeguarding risks or relevant and significant safeguarding reports
Consult with the relevant Designated Safeguarding Lead if they are aware of a young person or adult at risk, and in a position where they are unsure what to do	·Ensure sufficient resources (time and money) are allocated to ensure that the policy can be effectively implemented	Source of advice and support when required	Report any safeguarding notifications/issues in quarterly monitoring meetings
Understand expectations for reporting and recording concerns	·Ensure staff have access to appropriate training and information	Ensure concise, timely record keeping	
Complete mandatory training and ensure participation in refresher training	Ensure the policy is in place, appropriate and accessible	Raise awareness of Safeguarding and the importance of effective practice	
Alert their line manager or the HR Manager as quickly as possible if they've concerns about the behaviour of a colleague.		Meet quarterly to review the OPCC/VRP Safeguarding Log and reflect on actions taken	
		To produce an annual report for SMT reflecting on OPCC/VRP Safeguarding incidents	

Escalating Concerns in Practice

If anyone is concerned that a child of vulnerable adult is at risk of being harmed, abused or neglected, they should not ignore their suspicions. 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.

