



GRACE ENTERPRISES



Safeguarding Policy

1.0 Commitment to Safeguarding Statement

1.1 Grace Enterprises recognises the need to provide a safe and caring environment for children, young people and adults at risk. We acknowledge that children, young people and adults at risk can be the victims of physical, sexual and emotional abuse, and neglect.

1.2 Grace Enterprises accepts the UN Universal Declaration of Human Rights and the various International rights Conventions, which states that everyone is entitled to “all the rights and freedoms set forth therein, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. We also agree with the Convention on the Rights of the Child which states that children should be able to develop their full potential, free from hunger and want, neglect and abuse. They have a right to be protected from “all forms of physical or mental violence, injury or abuse, neglect or negligent treatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has care of the child.”

1.3 Grace Enterprises has therefore adopted the procedures set out in this safeguarding policy in accordance with statutory guidance.

1.4 The policy and appendices are based on the [ten safeguarding standards](#) published by the independent safeguarding charity *Thirtyone:eight*. Grace Enterprises undertakes to:

- Endorse and follow all national and local safeguarding legislation and procedures, in addition to the international conventions outlined above.
- Provide on-going safeguarding training for all its workers and regularly review our operational guidelines.
- Ensure that our premises meet the requirements of the Equality Act 2010 and all other relevant legislation, and that it is welcoming and inclusive.
- Support the Safeguarding Coordinator(s) in their work and in any action they may need to take in order to protect children and adults at risk.



2.0 Responsibilities

2.1 Overall responsibility for introducing, implementing, and maintaining this Safeguarding Policy and those associated with it rests with the Board of Directors for Grace Enterprises. Phil (John) Collinge, a Director of Grace Enterprises, has responsibility for the monitoring of safeguarding (07802 883700).

2.2 Responsibility for the protection of children and adults at risk is delegated to Samantha Parfitt, Employee Support Officer (07868 784980). Sam is Grace Enterprises' designated Safeguarding Coordinator. In her absence, the Deputy Safeguarding Coordinator is Roger Doxat-Pratt, Grace Enterprises Operations Lead (07912 177590).

2.3 Protecting people who come into contact with our services from abuse is everyone's responsibility. As such, all workers of Grace Enterprises and its associated businesses have a duty to raise concerns swiftly, without prejudice to their own position, about behaviour by colleagues, managers, trustees, volunteers, partners, stakeholders or others which may be harmful to those in their care, and will receive appropriate support when doing so.

3.0 Definitions

3.1 A **child** is anyone under the age of 18, regardless of their personal circumstances. Grace Enterprises currently employs only adults, but may employ or offer training to 16 and 17 year olds in the future. Grace Enterprises is also committed to the protection of any children who come into contact with our services, e.g. children of our workers or customers.

3.2 An **adult at risk** refers to any person aged 18 or over who "may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to protect him or herself against significant harm or serious exploitation" (*Who Decides*' Lord Chancellor's Office 1997). Grace Enterprises provides supportive employment through sustainable businesses to adults who may have multiple barriers to work, including adults at risk. We may also offer business services to customers who are adults at risk.



3.3 **Worker** refers to any employed staff member or volunteer in their capacity undertaking work for Grace Enterprises or one of its associated businesses.

3.4 The term **Safeguarding** covers the steps organisations take individually and in partnership to protect children and adults at risk from abuse. This includes policies and procedures adopted, training given, and protocols in place to ensure the safety of others.

3.5 **Abuse** is the violation of an individual's human and civil rights by another person or persons. Abuse may be a single or repeated act. Abuse may result in harm to, or exploitation of, the person subjected to it. There are several types of possible abuse:

- A. **Discriminatory abuse** can be on the grounds of any of the nine protected characteristics named in the Equality Act 2010: age, gender, race, disability, sexual orientation, marriage/civil partnership status, pregnancy/maternity, religion or belief and gender reassignment. Discriminatory abuse also incorporates hate crime and mate crime. Mate crime occurs when people at risk are befriended with the intention to abuse.
- B. **Emotional / Psychological Abuse** involves the persistent emotional ill treatment of a child or adult such as to cause a severe and adverse effect on their emotional development. As well as persistent lack of love and attention, this can include intimidation, humiliation, constant criticism, threats, taunting and words and action that demean the person. It may involve emotional blackmail, denial of basic human rights, conveying to the individual that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may involve causing an individual to feel frightened or in danger, or the exploitation or corruption of others. It may involve preventing someone from enjoying activities and/or meeting friends. There is some level of emotional abuse in all types of abuse, but it can also occur alone.
- C. **Physical Abuse** involves physical injuries where there is no satisfactory explanation or definite knowledge or where there is a reasonable suspicion that the injury was inflicted with intent, caused through lack of care by a person having custody, charge or care of the individual. It includes hitting, shaking, throwing, squeezing, burning and biting as well as giving inappropriate drugs or poisonous substances. It also includes attempted suffocation or drowning and fabricating the symptoms of an illness.



Reasonable physical restraint to prevent a vulnerable person from harming themselves, another person or from causing serious damage to property is not deemed to be abuse.

- D. **Sexual Abuse** involves forcing or enticing an individual to take part in sexual activities (whether or not the individual is aware of what is happening). If an individual is pressurised to do something sexual against their will, it is a form of sexual abuse. This could be direct sexual activity, penetrative or non-penetrative acts, unwanted touching, taking indecent photographs or videos, showing pornographic material or encouraging them to behave in sexually inappropriate ways. Sexual assault, incest, rape by a stranger or inside marriage, are all crimes and matters for the police. Sex without a person's consent due to drugs or alcohol or unconsciousness is abusive.
- E. **Domestic Abuse** is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between individuals aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexual orientation. Abuse may be psychological, physical, sexual, financial and/or emotional.
- F. **Financial / Material Abuse** can take the form of theft, fraud, exploitation, the misuse or misappropriation of property without the individual's permission. This could involve large sums of money or just small amounts from a pension or allowance each week.
- G. **Institutional Abuse** is different from other categories because it is about who abuses and how that comes to pass, rather than about types of harm. Abuse can occur in a relationship, family, service or institution and it can be perpetrated by an individual or more collectively, by a regime.
- H. **Neglect** involves failure to meet the physical and/or psychological needs of a child or adult at risk, and is likely to result in the serious impairment of their health or development. It may involve a failure to provide food, warmth, clothing, love, affection, attention and recognition, or a failure to protect an individual from physical harm or danger or a failure to ensure access to appropriate medical care or treatment.
- I. **Bullying** is deliberate, hurtful behaviour, usually repeated over a period of time where it is difficult for those being bullied to defend themselves. It



may be related to any personal characteristic of the person (whether perceived or real), or by association (i.e. related to the person's relationship or dealings with others who have that personal characteristic). Bullying can be verbal, written or physical and can take many forms, from relatively mild banter to actual physical violence.

- J. **Modern Slavery** is a term used to cover offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour, and human trafficking.
- K. **Child Sexual Exploitation** involves exploitative situations, contexts and relationships when children receive "something" (e.g. food, accommodation, drugs, alcohol, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the individual's immediate recognition, e.g. being persuaded to post or send sexual images on the internet/phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, and exploitative relationships are characterised in the main by the child's limited availability of choice resulting from their socio-economic and/or emotional vulnerability.

4.0 Recognising and Reporting Abuse

4.1 Workers should prioritise the safety and protection of children and adults at risk, and it is the responsibility of all workers to act on any suspicion or evidence of abuse.

4.2 Confidentiality is important, but in some circumstances it will be necessary to share what might normally be regarded as confidential information. An attempt should be made to gain consent to share information, but it will not be essential when there is a risk of harm. The following principles should be adhered to:

- Information will be shared on a need to know basis.
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- Information will be shared when it is in the best interests of the child or adult at risk.
- Confidentiality must not be confused with secrecy.

4.3 Grace Enterprises workers are required to cooperate with any investigation carried out by the local authority or other agencies (e.g. the police), in cases that we have reported or where Grace Enterprises has been involved in providing services.

4.4 **Procedure 1:** where a worker is concerned about abuse:

- A. Workers should discuss any concerns with the Safeguarding Coordinator or Deputy Safeguarding Coordinator. If those concerns relate to the Safeguarding Coordinator, workers are expected to discuss the matter with the Deputy Safeguarding Coordinator. If an individual feels that the Safeguarding Coordinator or the Deputy Safeguarding Coordinator have not responded appropriately, they should contact Phil Collinge, the responsible director.
- B. Every effort should be made to maintain confidentiality (see 4.2). Suspicions must not be discussed with anyone else in the organisation other than those nominated above. If the Safeguarding Coordinator or the Deputy Safeguarding Coordinator is absent, then individuals should not delay and should contact the responsible director.
- C. The Safeguarding Coordinator (or Deputy) has the responsibility to act on behalf of Grace Enterprises in dealing with allegations or suspicion of abuse or neglect. This will include collating details of the allegation of suspicion using a Safeguarding Concern Form (Appendix 1) and referring the matter to the relevant Local Authority Safeguarding Team (Appendix 3). It is the task of the local Children's or Adult's Social Care services to investigate the matter.
- D. Safeguarding is the individual responsibility of each person working with children or adults at risk. When any worker is concerned about a safeguarding issue, the concern must be reported.
- E. Under no circumstances should workers carry out their own investigation into suspicions of abuse, nor should they question a child or adult at risk closely, nor any person named in any allegations, as to do so may distort any investigation that may be carried out subsequently or by the relevant authorities.



4.5 **Procedure 2:** where a child or adult at risk says something or acts in such a way that abuse is suspected or disclosed:

A. Children and adults at risk will occasionally disclose abuse to someone they have come to feel they can trust. This happens for many reasons and they may even ask the worker not to do anything with the information.

B. The worker receiving the information should:

- Respond in a calm but concerned way – do not allow shock or distaste to show.
- Tell the individual that they are right to share what has happened and reassure them that they are not responsible for what happened and the abuse was not their fault.
- Accept what the individual is saying – do not get them to justify what they are saying.
- Keep questions to a minimum, only to clarify what the individual is saying, not to interrogate.
- Not interrupt the individual when they are recalling significant events.
- Not make assumptions or speculate nor make negative comments about the abuser.
- Reassure the individual that the problem can be dealt with.
- Repeat in summary what the individual has told them to ensure it has been fully understood.
- Not promise the individual that they will keep what is said as confidential or “secret”.
- Reassure the individual that the information will only be passed to those people who need to know.
- Tell the individual who needs to be informed, and where possible, gain their consent.

C. Following the conversation, a full accurate record should be made using the Safeguarding Concern Form (Appendix 1), though this should not result in a delay in reporting the issue. The report should include a verbatim record of the disclosure. This may be used later in a criminal trial and it is vital that what the individual discloses is recorded as accurately as possible. Therefore the record must be drafted in the individual’s words and should not include assumptions or opinions of others. The individual’s known details, including name, date of birth, address and contact numbers must be stated. It should also include the nature of the allegation including



dates, times, specific factors and any other relevant information such as witness details. Additionally there should be:

- A clear distinction between what is fact, opinion and hearsay
- Clarity whether or not the person making the report is expressing their own concerns or those of someone else
- A description of any visible physical injury (clothing should not be removed to inspect) or details of indirect signs such as behavioural changes.

- D. If the concern arises out of normal office hours and it is clear that abuse has occurred, contact should be made with the Local Authority Safeguarding Team (Appendix 3). Ensure that the Safeguarding Coordinator is notified at the earliest opportunity.
- E. In the event of the need to protect a child or young person immediately, dial 999. The Police are the only agency with statutory powers for the immediate protection of children.

4.6 **Procedure 3:** handling allegations / suspicion of abuse against a GE worker:

- A. It can be difficult to accept that a colleague may deliberately harm a child or adult at risk. It may also be that the behaviour that causes concern is poor practice rather than abuse. However, in these circumstances, the worker should still report their concerns to the Safeguarding Coordinator as outlined above in Procedure 1, using a Whistleblowing Form (Appendix 2).
- B. Following consideration, if it is clear that the concern is about poor practice rather than abuse, the Safeguarding Coordinator will take the necessary action to advise, manage and/or instigate disciplinary action against the worker about whom the allegation has been made.
- C. If appropriate, the Safeguarding Coordinator will report the concerns to the relevant local authority contact.
- D. Irrespective of the outcome of any external investigations, Grace Enterprises may consider suspension and/or disciplinary action.

4.7 Under the following circumstances, contact the Safeguarding Coordinator who will discuss the matter with you and advise whether a Safeguarding Concern Form (Appendix 1) should be completed:

- If you or another worker accidentally hurts someone



- If a child or adult at risk seems distressed in any manner
- If a child or adult at risk appears to be sexually aroused by your actions
- if you are concerned that a relationship is developing that could represent an abuse of trust
- If you are concerned that a child or adult at risk is becoming attracted to you
- If you are concerned that a colleague is becoming attracted to someone in their care
- If a child or adult at risk misunderstands or misinterprets something you have done
- If you have had to use reasonable physical restraint to prevent a child or adult at risk harming themselves or another or from causing significant damage to property
- If a person reports an allegation regarding a member of an external organisation

5.0 Minimising Risk

5.1 All workers at Grace Enterprises are encouraged to demonstrate exemplary behaviour when working with children or adults at risk in order to protect these groups from abuse and themselves from false allegations.

5.2 Our employees have a diverse range of backgrounds and personal histories. We encourage self-disclosure of any history of criminal activity or difficulties working alongside others. We carry out a basic check of information in the public domain and gain additional information from a person in support of their application. This enables us to allocate workers to specific jobs and in specific teams in order to minimise risk.

5.3 Operational decisions within Grace Enterprises businesses should factor in safeguarding risks, e.g. in allocating shifts or accepting contracts.

6.0 DBS Checks

6.1 Grace Enterprises will carry out appropriate DBS checks for those:

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- In positions of strategic influence and responsibility for children or adults at risk (e.g. Directors / CEO)
- Carrying out roles deemed to be similar to regulated activities (e.g. Employee Support workers)
- In a position of operational influence over our employees (e.g. Operations Managers)
- Volunteering as mentors to employees who are children or adults at risk

6.2 The Vetting & Barring Scheme Remodelling Review (Report and Recommendations February 2011) states that “for those individuals who do not work in regulated activity but nevertheless work, paid or unpaid, with vulnerable adults, their employers can, but will not be required to, obtain criminal records checks [Disclosure and Barring Service check].

7.0 Following the Policy

7.1 The Safeguarding Coordinator is responsible for keeping up to date with current legislation and best practice, for example through undertaking training activities.

7.2 Safeguarding issues will be addressed at staff induction and discussed on an ongoing basis.

7.3 Grace Enterprises will support and protect those workers who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions. Allegations that are found to have no grounds or substance have been raised with malicious intent will be managed in accordance with our Disciplinary Procedure.

7.4 All employees, workers and volunteers at Grace Enterprises will be made aware of this policy and a copy will be available in the office.

7.5 Failure to follow the guidelines in this policy is considered a serious offence and will be investigated thoroughly and dealt with through our Disciplinary Procedure. Serious breaches will be considered gross misconduct.



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GE Safeguarding Policy

8.0 Implementation and Review

8.1 This policy takes effect from May 2022 and replaces all previous policies.

8.2 The policy will be reviewed annually with relevant stakeholders, or sooner if there is a fundamental change of legislative or regulatory provisions.

8.3 Any queries or comments about this policy should be addressed to the Safeguarding Coordinator or the Deputy Safeguarding Coordinator.

Policy written by: Roger Doxat-Pratt, Operations Lead
Scope: Grace Enterprises and all associated businesses
Date of last review: December 2022



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Appendix 1: SAFEGUARDING CONCERN FORM

Details of child or adult at risk

Full name:

DOB (if known):

Social Care # (if applicable):

Brief description of support needs:

Address and Postcode:

Report details

Full name of reporter:

Role of reporter:

Date & time:

Location:

Reasons for concern:

Notes from conversations with the child / adult at risk (if relevant):

Sign: _____ Date: _____

Submit completed forms immediately to Samantha Parfitt (Safeguarding Coordinator).



Appendix 2: SAFEGUARDING WHISTLEBLOWING FORM

Details of child or adult at risk

Full name:

DOB (if known):

Social Care # (if applicable):

Brief description of support needs:

Address and Postcode:

Details of Grace Enterprises worker in question

Full name:

Job role :

Report details

Full name of reporter:

Role of reporter:

Date & time:

Location:

Witnesses:

Incident of concern:

Sign: _____ Date: _____



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Submit completed forms immediately to Samantha Parfitt (Safeguarding Coordinator).



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Appendix 3: Contact Details

Grace Enterprises Safeguarding Team:

Safeguarding Coordinator: Samantha Parfitt – 07868 784980, sam@graceenterprises.co.uk

Deputy Safeguarding Coordinator: Roger Doxat-Pratt – 07912 177590,
roger@graceenterprises.co.uk

Responsible Director: Phil (John) Collinge – 07802 883700

To contact the police:

In an emergency call 999. To report a crime call 101.

To make a safeguarding referral:

Nottingham City Council Health and Care Point – 0300 131 0300

Nottinghamshire County Council: complete the adults safeguarding online form
(www.nottinghamshire.gov.uk/care/safeguarding/mash)

Multi-Agency Safeguarding Hub (MASH) – 0300 500 80 90 (professionals only)

Nottinghamshire Customer Service Centre – 0300 500 80 80 (members of public)

Urgent Out of Hours referral:

Nottingham City Council on 0115 8761000

Nottinghamshire County Council on 0300 500 80 80

For advice regarding Modern Slavery:

Modern Slavery National Helpline: 08000 121 700



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National Referral Mechanism(NRM):

www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales

Nottingham City Council Health and Care Point – 0300 131 03 00

Salvation Army – 03003 038151

Gangmasters and Labour abuse Authority – 0800 4320804

Migrant Help – 01304 203977

If the suspected victim does not want to engage with the police or NRM then call British Red Cross – 07710 733051 (24h line)