



My Life Safeguarding Policy

RECOGNISE RESPOND RECORD REFER

Table of Contents

1. Introduction	2
2. Purpose and Legal Context	3
3. Aims and Objectives.....	4
4. Roles and Responsibilities	5
5. Policy	7
6. Procedures	9
7. Further Resources	14
8. Associated My Life Policy links.....	15



1. Introduction

My Life Legacy is committed to safeguarding and promoting the welfare of all our members, both children and adults. Our members have the right to be safe from harm and should be able to live free from fear of abuse, neglect and exploitation.

Safeguarding and promoting the welfare of children (any person who has not reached their 18th birthday) is defined for the purposes of this policy as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- Taking action to enable all children to have the best outcomes.

Working Together to Safeguard Children (2018) page 6

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard_Children.pdf

The legal definition of an 'adult at risk' is anyone aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and
- is experiencing, or is at risk of abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk, or the experience of abuse or neglect.

Care Act 2014 Section 42 (1)

<http://www.legislation.gov.uk/ukpga/2014/23/part/1/crossheading/safeguarding-adults-at-risk-of-abuse-or-neglect/enacted>



2. Purpose and Legal Context

My Life Legacy fully recognises the contribution it can make to protect its members from harm.

RECOGNISE RESPOND RECORD REFER

The purpose of this policy is to outline the duties and responsibilities of staff, volunteers and trustees working on behalf of My Life Legacy in relation to;

- the protection of children within the context of *Keeping Children Safe in Education 2016*, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf,
- *Working Together to Safeguard Children 2018* (see link on page 1) and
- *What to do if you are worried a child is being abused – Advice for practitioners 2015*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf
- the protection of adults at risk of harm within the context of the *Care Act 2014* (see link on page 1) and
- *The Making Safeguarding Personal Toolkit 2020*. <https://www.local.gov.uk/msp-toolkit>
- The Human Rights Act 1998 <https://www.equalityhumanrights.com/en/human-rights/human-rights-act>
- The Data protection Act 2018 (GDPR) <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
- The Equality Act 2010 <http://www.gov.uk/equality-act-2010-guidance>

It is important to remember that adults at risk can also abuse and that any such incidents also fall into the remit of this policy.



3. Aims and Objectives

My Life Legacy is committed to the development of good practice, sound internal procedures and establishing a culture of vigilance;

RECOGNISE RESPOND RECORD REFER

The aim of this policy is to safeguard and promote members' welfare, safety, health and guidance by fostering an honest, open, caring and supportive climate. This ensures that child and adult protection concerns and referrals may be handled sensitively, professionally and in ways which place the best interests of the member at the centre of all we do.

Our policy for adults at risk of harm is designed to promote practice which:

- a) achieves or exceeds the Care Quality Commission (CQC) fundamental standards below which care should never fall; Regulation 13: Safeguarding service users from abuse and improper treatment.
<https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-13-safeguarding-service-users-abuse-improper>
- b) Upholds the six key principles which inform the way in which all staff should work with adults,
<https://www.highspeedtraining.co.uk/hub/principles-of-the-care-act-2014/> and,
- c) provides clear procedures to be followed should adult protection issues arise.

Our objectives are to;

- Always act in the interests of the member and respect confidentiality in all cases
- Contribute to inter-agency working in line with statutory guidance, ensuring our safeguarding arrangements align with local Safeguarding Board procedures
- Ensure the safe recruitment of all staff working with members across the organisation
- Provide Safeguarding training ensuring all staff are aware of their duties and responsibilities
- Ensure that the DSL and Deputies complete updated Safeguarding training in line with local Safeguarding Board guidance
- Give all business leads responsibility for proactive management of risk through the REMM process, overseen by the DSL
- Teach our members about safeguarding and promote ways they can access help and support
- Ensure that there is a transparent system to manage allegations against staff members involving LADO/PIPOT/DBS
- Ensure that the CEO / Safeguarding Lead Trustee liaise with the local authority and/or partner agencies on Safeguarding matters and if any allegations are made against the DSL
- Ensure that we promote the education and achievement of Looked After Children (LAC)



4. Roles and Responsibilities

My Life Legacy Chief Executive Officer

The Chief Executive Officer (CEO) will take the lead responsibility for safeguarding if any concerns are raised in respect of the Designated Safeguarding Lead.

Chief Executive Officer Caroline Tomlinson

Designated/Deputy Designated Safeguarding Lead.

The Designated Safeguarding Lead (DSL) and the Deputy DSLs are most likely to have the complete picture and be the most appropriate person to advise on responses to safeguarding concerns. The DSL should take lead responsibility for safeguarding and ensure that My Life Legacy's Safeguarding policy is fully implemented. Together with Deputy DSLs, the DSL has responsibility for the day-to-day operational implementation of safeguarding practice. This includes:

- Ensuring all My Life Legacy staff receive safeguarding training upon commencement of post and annually thereafter.
- Receiving information from any of the staff, members and associates who have a safeguarding concern and ensuring this is recorded accurately on CPOMS. (See pages 9 and 10).
- Providing advice on action to be taken or consulting statutory safeguarding agency (e.g., relevant Council Safeguarding Team, individual social worker) to test any doubts.
- Managing the proactive Safeguarding discussions for the most complex cases - REMM (Risk Evaluation, Management and Monitoring – see pages 11 and 12).
- Co-ordinating referrals to the Safeguarding Team and any other bodies as appropriate e.g. Ofsted, CQC.
- Collating Board reports for My Life Board of Trustees detailing safeguarding activity, interventions and outcomes.

Designated Safeguarding Lead: Gareth Hughes

Deputy Designated Safeguarding Leads: Sue Cadman
Nigel Lyons
Tracey Tolley
Pam Hicken

Safeguarding Lead Trustee

The Board of Trustees has a duty to ensure that My Life Legacy meets its statutory safeguarding responsibilities and that all the members supported by My Life are safe. The DSL provides quarterly reports to the Board to support their execution of this function. In addition to this there is a designated Lead Trustee for safeguarding who carries out regular safeguarding review with the DSL.

Lead Trustee for Safeguarding: Helen Gaskell



Staff

“What if I’m right?”

All staff, volunteers and trustees working on behalf of My Life Legacy have a duty to promote the welfare and safety of all our child and adult members. Staff may receive disclosures of abuse, observe or have suspicions of abuse. Any such concerns (whether or witnessed or otherwise) should be reported immediately to the DSL or the most senior member of staff on duty in their absence.

“Safeguarding and promoting the welfare of children is everyone’s responsibility, everyone who comes into contact with children and their families has a role to play”

Keeping Children Safe in Education (2018) P.5

“If someone knows that abuse or neglect is happening, they must act upon that knowledge, not wait to be asked for information.”

Care & Support Statutory Guidance DOH (2014) para. 14.185 <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1>

Staff working with our members are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a member, staff should always act in the interests of that member. Staff should always share their concerns with a colleague, not thinking “What if I’m wrong?” but thinking *“What if I’m right?”*

Staff should not assume a colleague or other professional will act and share information that might be critical in keeping children safe. Early information sharing is vital for effective identification, assessment and identifying the best response (see Procedures on page 8).

“Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children”

Keeping Children Safe in Education DfE (2018) P.12

If a child is at immediate risk of harm, a referral should be made to children’s social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in My Life’s Safeguarding practice. They should feel able to raise concerns with the Senior Leadership Team. Staff can also utilise the Whistleblowing policy where appropriate.

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/469.%20Whistleblowing%20Policy.pdf>



5. Policy

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Abuse is a form of maltreatment - somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. Children and adults at risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sexting put children and adults at risk of danger. Safeguarding issues can also manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), physical abuse, sexual violence/sexual harassment and sexting (also known as youth produced sexual imagery) and initiation/hazing type violence and rituals. Such incidents should not be passed off as 'banter' and will be treated as a safeguarding concern in the same way as any other issue through My Life Legacy's Safeguarding procedures.

Contextual safeguarding: safeguarding incidents and/or behaviours can be associated with factors outside My Life. All staff should be considering the context within which such incidents and /or behaviour occur. Assessments of members should consider whether wider environmental factors are present in their lives that are a threat to their safety and/or welfare. Special Educational Needs (SEN) and disability should be considered as part of the contextual safeguarding agenda; therefore, the members of My Life are particularly vulnerable.

Being alert to abuse means:

- Thinking about what we see and asking if it is acceptable behaviour.
- Taking a member-centred approach and being mindful of discriminatory behaviour.
- Always taking seriously what we are told.
- Being mindful of any signs/signals/non-verbal communication that could suggest abuse or neglect.
- Being mindful that adults may be targeted by organisations or persons associated with terrorism, trafficking, slavery and forced marriage.



The following are categories of child abuse but the core element that ties them together is **the emotional effect on the child:**

- Physical abuse including Female Genital Mutilation (FGM)
https://greatermanchesterscb.proceduresonline.com/chapters/p_fgm.html
- Emotional abuse
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/emotional-abuse/>
- Sexual abuse including child sexual exploitation and child on child sexual violence and sexual harassment
<http://www.wiganlscb.com/Professionals/Keeping-children-safe/Child-sexual-exploitation.aspx>
- Neglect
<https://www.gov.uk/government/publications/indicators-of-neglect-missed-opportunities>
- Criminal Exploitation <https://www.stopthetraffik.org/criminal-exploitation/>

These categories are considered for abuse of 'adults at risk'; the Care and Support Statutory Guidance (issued under the Care Act 2014; link on page 5) outlines how abuse takes many forms and how individual circumstances should be considered. **Exploitation is a theme in these categories:**

- Physical
- Psychological
- Sexual
- Financial or material
- Neglect and acts of omission
- Domestic abuse (including 'honour' based violence)
- Modern slavery
- Self-Neglect
- Organisational
- Discriminatory / Hate Crime

Further detail can be accessed via this link; <http://wigansafeguardingadults.org/Public/What-is-abuse/Types-of-abuse.aspx>

Finally, these categories cover both children and adults at risk;

- Prevent – Radicalisation for the purposes of terrorism activity
<https://www.wigan.gov.uk/Docs/PDF/WSCB/PVE-Policy.pdf>
- Forced Marriage - <https://www.gov.uk/stop-forced-marriage>



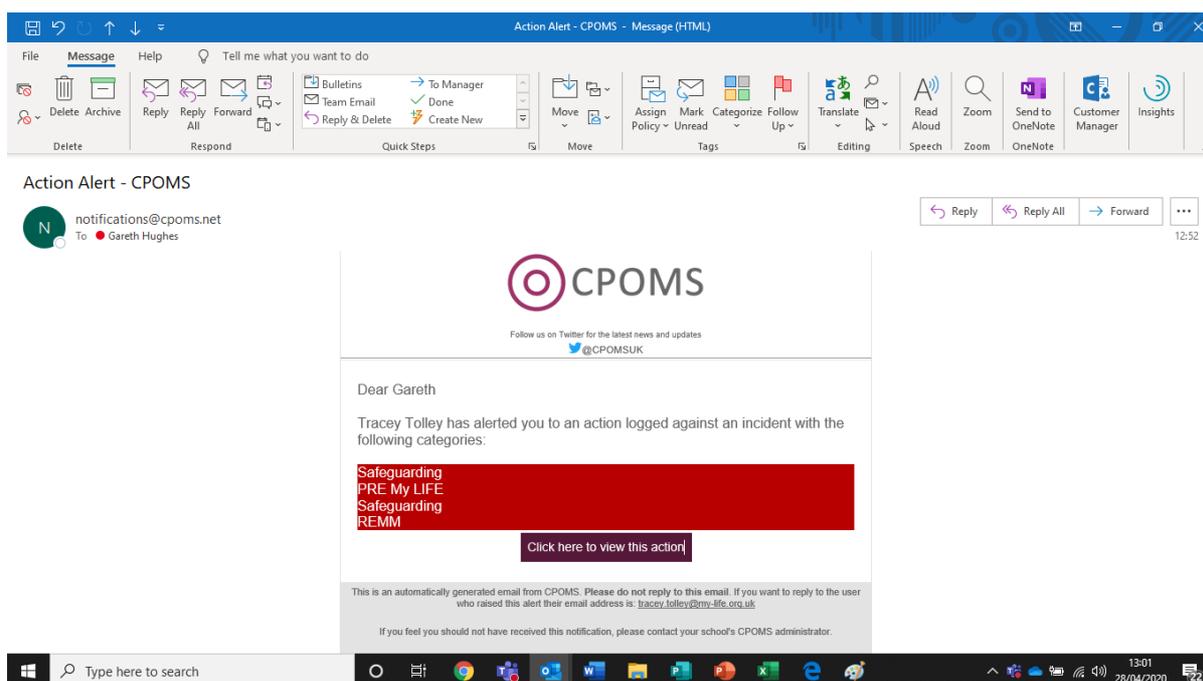
CPOMS

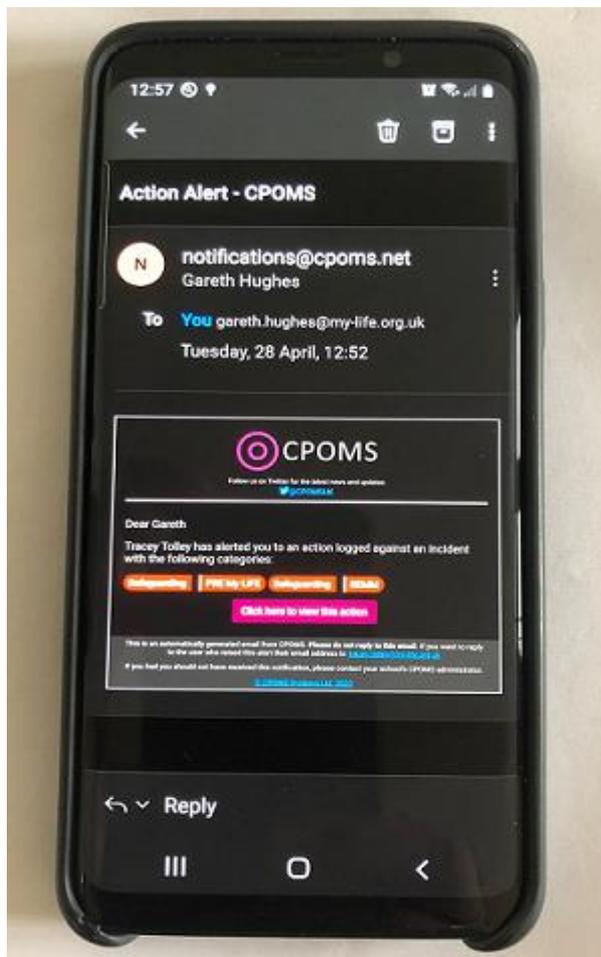
CPOMS is My Life Legacy's chosen software solution for monitoring Safeguarding across the organisation. CPOMS is a secure, web-based solution that allows staff to feel confident in the knowledge that the information they report is shared instantly with the relevant people, immediately and securely. All our staff can log on to CPOMS and create information on any member they have concerns about. They cannot, however, access member information without the required permissions (managed by DSL);

The screenshot shows the CPOMS web interface. At the top, there are navigation links: CPOMS Website, CPOMS User Guide, Contact Support, and CPOMS FAQ. Below this is a dark purple header with 'My Life' and a dropdown menu, followed by 'Dashboard', 'Reporting', 'Planner', 'Library', 'Admin', and 'Account Settings'. On the right side of the header are 'Add Incident', a notification bell, and 'LOGOUT'. The main content area is a form with the following fields:

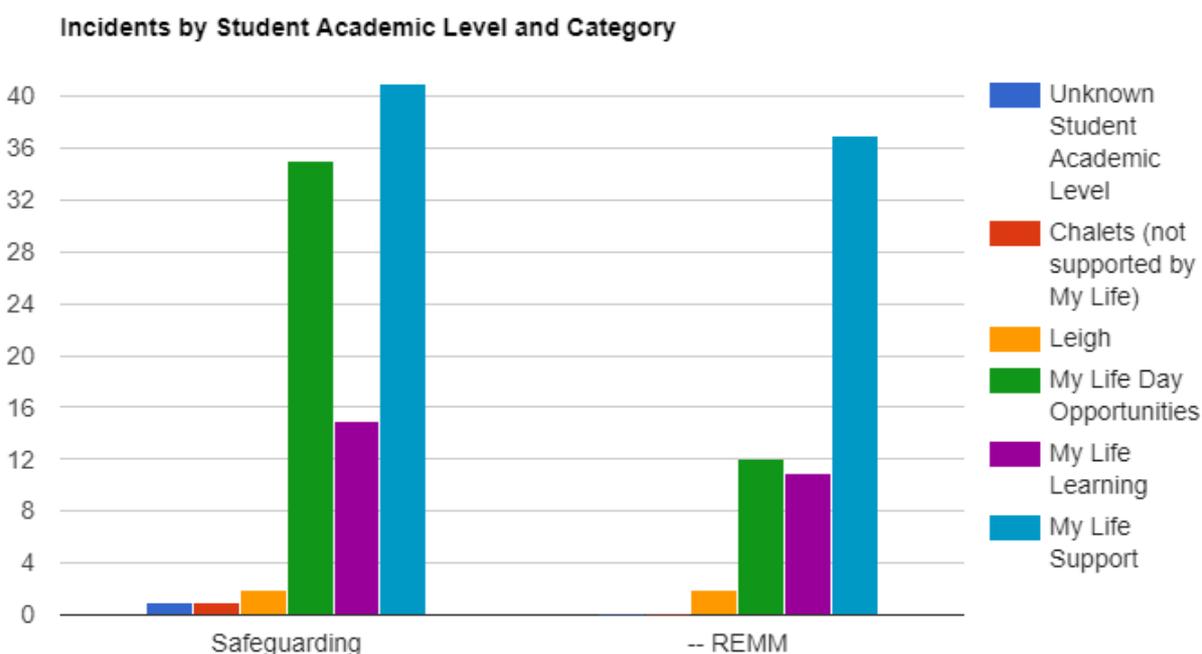
- Student:** A text input field with the placeholder 'Begin typing a student's name' and a dropdown arrow.
- Incident:** A large text area for describing the incident.
- Categories:** A list of checkboxes for selecting incident categories: Attainment, Attendance, Behaviour Related Log, Bullying/ Friendship Related Issues, Cause for Concern, Child Contact, Child Protection, Communication, Contact with External Agency, Health and Safety, Home Issues/ Parenting Issues, Medical Issues, Parental Contact, Safeguarding, SEND, and Team Teach Incident.
- Linked student(s):** A text input field with the placeholder 'Begin typing a student's name' and a dropdown arrow, with a note 'Type a student's name to link them to this incident.'
- Body map:** A dropdown menu.
- Date/Time:** Two input fields for date and time, showing 'Tue 28 April 2020' and '12:09PM'.

When information is created, CPOMS then alerts the DSL, both via desktop / laptop options and mobile phone, allowing the DSL to be updated in real time to issues being raised;





The DSL can swiftly assess the information and take any necessary action required. CPOMS can also easily create reports and management information for a range of different uses.





REMM – Risk Evaluation, Management and Monitoring

REMM is the process by which My Life Legacy works together across the different business areas on the management of complex risks presented by individual members who access our services.

The whole purpose of identifying and managing complex cases aims to allow effective information sharing between the staff who regularly support those members. This allows for greater understanding of individual need and a more consistent response where necessary, leading to a greater organisational ability to recognise when a member is either in or approaching crisis. The process is managed and monitored holistically by My Life Legacy, rather than responsibility for those tasks remaining within a particular business area.

This process ensures that;

- we have both the capacity and the capability to provide the level of support needed by a member in advance of any agreement to provide services,
- allows us to monitor and respond to variability once services are being provided and,
- if necessary, enables us to refer back, with a detailed evidence base, to the commissioner for a review of support requirements should difficulties be encountered.

It also enables us to develop individual 'exit' strategies from My Life when the member moves on, incorporating an 'after care' / follow up element to aid transition.

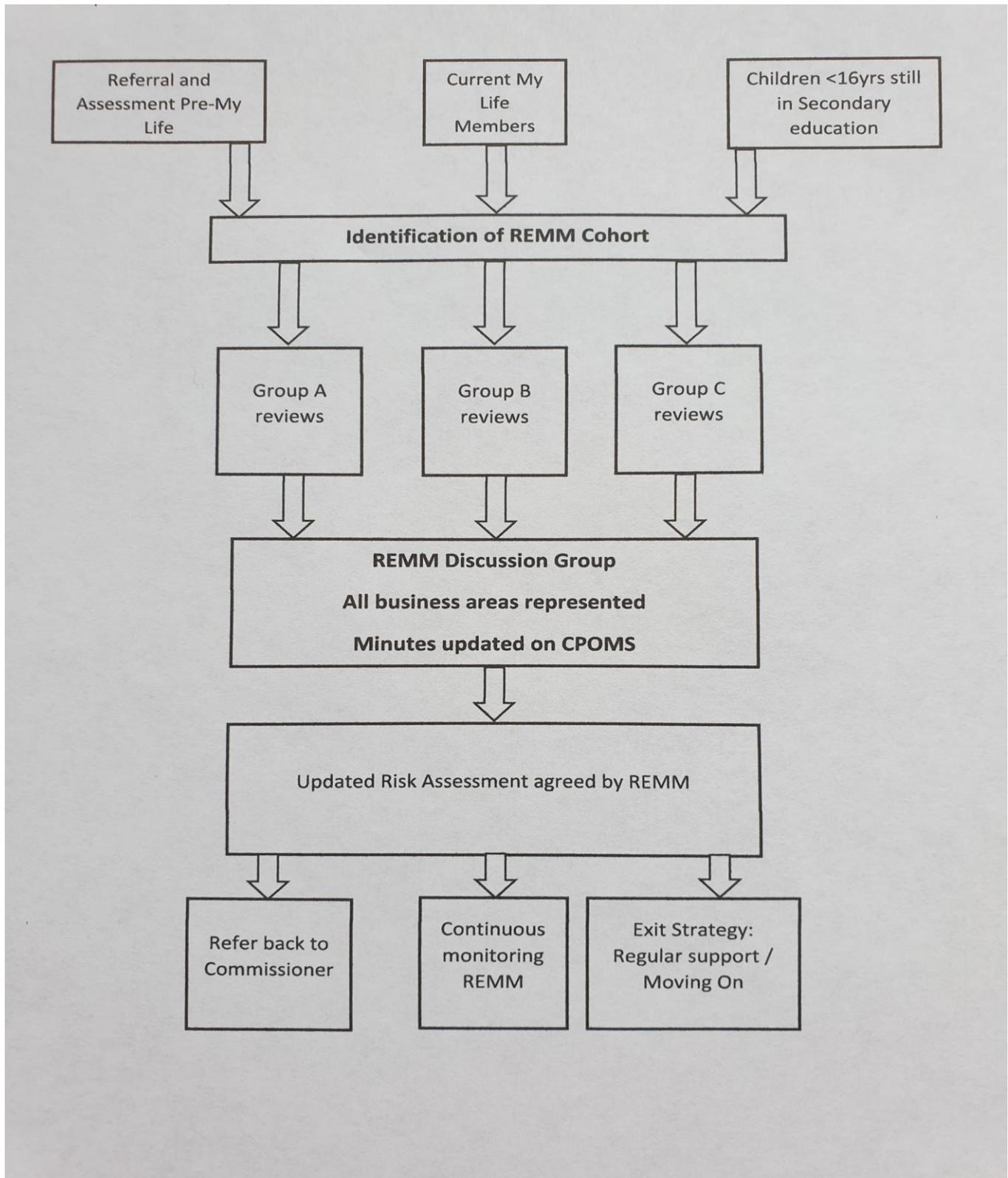
Our aim is that this process increases confidence in My Life and enhances its reputation among members' parents and carers.

The REMM discussion group is made up of Heads of Services, i.e., Day Opportunities at both Standish and Leigh, My Life Support, My Life Learning, Referrals and Membership Pastoral Care/Support, plus the members of staff who have been identified as key workers and owners of the individual member's Risk Assessment. A fundamental part of the discussion groups is to update and approve those risk assessments.

The members who have been referred into REMM are placed into one of three cohorts: the My Life Support (MLS) cohort is reviewed fortnightly while the Day Opportunities and My Life Learning cohorts are discussed monthly. The discussions are recorded and updated on each member's CPOMS record.

The length of time spent as part of REMM is dependent on the individual member's specific circumstances, but the ultimate aim is for My Life Legacy to have been able to mitigate risks of concern to the point where the member is discharged from REMM and returns to regular support levels consistent with their individual support plans.

The process can be presented as follows;





7. Further Resources

<http://www.itsnotokay.co.uk/> Child sexual exploitation campaign providing advice, guidance and resources for children, parents and professionals

<https://www.thinkuknow.co.uk/professionals/> Providing support and education to raise awareness of online child exploitation and abuse

<https://learning.nspcc.org.uk/> Tools, training and resources to keep children safe.

<https://www.scie.org.uk/safeguarding/adults> Social Care Institute for Excellence resources for Safeguarding adults

<https://realsafeguardingstories.com/> Real safeguarding Stories is a video resource for safeguarding professionals and the wider community where survivors' stories are central to tackling abuse in society.



8. Associated My Life Policy links

This policy should be read in conjunction with the following policies:

Safeguarding Policy Covid 19 appendix

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/My%20Life%20Safeguarding%20Policy%20Appendix%20COVID-19.pdf>

The Prevent Duty

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/215.%20Anti%20Radicalisati on%20and%20Extremism%20Policy.pdf>

Recruitment & Selection of Staff

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/499.%20Recruitment%20Pol icy.pdf>

Challenging Behaviour Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/305.%20Challenging%20Beh aviour%20Policy.pdf>

Anti-Bullying Policy Statement

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/441.%20Anti- Bullying%20Policy.pdf>

Harassment Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/437.%20Harassment%20Pol icy.pdf>

Health & Safety

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/200.%20Health%20&%20Saf ety%20Policy.pdf>

Lone Workers Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/472.%20Lone%20Working% 20Policy.pdf>

Sexual Health & Relationships Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/602.%20Sexual%20Health% 20and%20Relationships%20Policy.pdf>

Mobile Phones Policy - referred to in Code of Conduct Policy

Discipline policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/483.%20Discipline%20Policy .pdf>



Staff Grievances Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/484.%20Grievances%20Policy.pdf>

DBS Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/493.%20DBS%20Disclosure%20Policy.pdf>

Equal Opportunities Statement & Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/471.%20My%20Life%20Equal%20Opportunities%20Policy.pdf>

Equality and Diversity Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/439.%20Equality%20and%20Diversity%20Policy.pdf>

Code of Conduct

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/003.%20Code%20of%20Conduct.pdf>

Standards of conduct, performance and ethics

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/491.%20Standards%20of%20Conduct,%20Performance%20and%20Ethics.pdf>

Code of conduct for staff working with vulnerable adults

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/464.%20Code%20of%20Conduct%20for%20Staff%20working%20with%20Vulnerable%20Adults.pdf>

Training and competency on Medication

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/146.%20Training%20and%20Competency%20on%20Medications%20Policy.pdf>

Complaints and Comments Procedure

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/041.%20Complaints%20and%20Comments%20Procedure.pdf>

Overarching GDPR Policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/801.%20Overarching%20GDPR%20Policy.pdf>

Data security and data retention policy

<https://mylifelegacy.sharepoint.com/sites/mylife/Policies%20%20Procedures/803.%20Data%20Security%20and%20Data%20Retention%20Policy.pdf>