

Sub-Sahara
Advisory Panel



SSAP

Safeguarding Policy & Procedure

Revision Date: 28/10/2025
Revision Version: 02
Author- HR Manager
Next review Date: 01/09/2028

Approved By:
Approval Date:

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1. Introduction & Background

1.1 Purpose and Commitment

Sub-Sahara Advisory Panel (SSAP) was formed in 2009 when a number of African diaspora groups in Wales met to consider how they might collectively advance their common interest in local issues affecting African communities in Wales as well as those in Africa. We apply our lived experience, skills, capacity and knowledge found within Welsh African diaspora communities.

We are a membership organisation of individuals and groups who work in sub-Sahara countries. We also work as a partner with African organisations, supporting them with funding applications and technical expertise and advice. Partners are required to have the capacity to address safeguarding in their local areas. SSAP uses a checklist which includes safeguarding, for the partnership to proceed. Where safeguarding practice is not up to international standards, SSAP will refer to the partner for support to improve practice until the standards are met. When a project is funded, we will work through a memorandum of understanding which will detail both partners' commitments to Safeguarding, and if there is a funding relationship, expectations about standards, communication and reporting. We will also discuss and decide how we will work together and communicate about Safeguarding best practice during our partnership.

We are committed to the wellbeing and safeguarding of children and adults. We believe that abuse is unacceptable and are determined to ensure all necessary steps are taken to protect children and adults at risk from harm and to prevent any form of abuse and neglect. We recognize that safeguarding is everyone's responsibility. All safeguarding concerns will be taken seriously and responded to appropriately and in line with these procedures. We work in partnerships with other agencies to apply safeguarding and where we share information with other agencies about children and adults at risk, we will do so in a way that takes into account its personal and sensitive nature and our legal obligations.

These initiatives relate to work with children aged under 18 years as well as adults. We recognise the importance of thinking broadly about how safeguarding concerns may become apparent. This includes for example the 'think family' approach which considers safeguarding concerns for the children and adults who receive services and participate in programmes and the adult family members of children who receive services. We also recognize the importance of safeguarding our own staff, volunteers, and contractors.

We have a board of trustees and the CEO who leads our organisation. This policy and procedure are approved by the board of trustees. It describes how we strive to meet our safeguarding responsibilities to provide systems and processes to manage safeguarding in line with our legal obligations. It is designed to ensure that trustees, staff and volunteers understand their responsibilities in protecting children and adults and in creating a safe working environment. It identifies the steps to take if there are any safeguarding concerns.

SSAP commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response. SSAP recognises that it has a safeguarding duty of care to project participants, staff and volunteers.

We will review and update this safeguarding policy and procedure annually or more frequently in light of learning from experience or significant changes in law, guidance or practice requirements. The policy and procedure will be approved by the Trustees.

We will make this policy and procedure available to staff and volunteers and ensure that children, adults and their families are informed of the policy and procedures and make it available to them and others who have an interest in our programmes.

1.2 Scope

This policy and procedure apply to everyone working for or with SSAP, including trustees, staff, volunteers and contractors. Hereafter all will be called 'staff' in this policy and procedure.

1.3 Equality and Diversity

The welfare of all our service users /project participants and staff is paramount and all have a right to equal protection from harm or abuse, regardless of gender, ethnicity, disability, sexuality, marital status, gender reassignment, age, pregnancy (maternity), beliefs or any other difference.

1.4 What is Safeguarding?

In Wales, safeguarding means preventing and protecting children and adults at risk from abuse or neglect and educating those around them to recognise the signs and dangers (Social Services and Well-being (Wales) Act 2014).

In the UK, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect.

In the international development sector, we understand it to mean protecting people, particularly women, girls, boys and adults at risk, from harm that arises from coming into contact with our staff or programmes.

1.5 Legislation and Guidance

This safeguarding policy and procedure are underpinned by law and statutory guidance which includes:

- Human Rights Act 1998
- Social Services and Wellbeing (Wales) Act 2014
- Working Together to Safeguard People 2021 (Wales) Wales Safeguarding Procedures 2019
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006 Protection of Freedoms Act 2012
- Sexual Offences Act 2003 Modern Slavery 2015
- Female Genital Mutilation Act 2003 Domestic Abuse Act 2021
- Counter Terrorism and Security Act 2015 Serious Crime Act 2015
- Data Protection Act 2018 (UK GDPR)
- Charity Commission Safeguarding Guidance 2019
- Equality Act 2010
- The United Nations Principles of Older Persons 1991
- The United Nations Convention on the Rights of the Child 1992

For programmes outside of the UK, the following standards and legislation apply, as well as relevant national legislation:

- United National Secretary-General's Bulletin on Preventing Sexual Abuse and Exploitation
- Inter-agency Standing Committee 6 Principles of PSEA and Minimum Operating Standards
- African Charter on Human and Peoples' rights
- African Charter on the Rights and Welfare of the Child
- Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa
- Protocol to the African Charter on Human and Peoples' Rights on the Rights of Older Persons

1.6 Relationship to other Policies and Procedures

This policy and procedure relates to and works alongside other SSAP policies and procedures to safeguard the organisation. They should be read in conjunction with this policy and procedure and include:

- Staff & Volunteers Code of Conduct
- Confidentiality Policy
- Staff Disciplinary Procedure
- Equality & Diversity & Inclusion Policy
- Harassment at work Policy
- Health & Safety Policy
- Data Protection Policies
- Personal Safety Policy
- Lone working policy
- Whistleblowing Policy
- Recruitment and Selection Policy and Procedure
- Anti-Social Behaviour Policy
- Sub-Sahara Advisory Panel – Mission, Visions & Values
- Domestic Abuse Policy
- Wellbeing Policy Autonomy & Independence Policy
- Complaints Policy
- Computer System, Email and Internet Policy
- Communications policy or guidance

2 Identifying Safeguarding risks and indicators:

2.1. Identifying Abuse and Neglect

SSAP recognises that there is a duty of care to all people who work, volunteer, or are contracted by our organisation, and that all people who come into contact with our organisation and programmes have a right to be safe.

However, there are two groups of people who are recognised to be at higher risk of safeguarding concerns, and these are defined as follows:

2.1.1. Defining ‘adult at risk’

‘Adults at risk’ are recognised to be at higher risk of harm and neglect. An adult at risk is defined in law in Wales as someone who is aged 18 years and over who:

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

An adult may be in need of care and support and unable to protect themselves from harm for reasons such as learning or physical disability, mental health difficulties, trauma, addiction, age, and infirmity.

An adult at risk/vulnerable adult in an international development context is an individual aged 18 years or over who is at greater risk of significant harm due to factors such as gender, age, mental or physical health, or as a result of poverty, inequality or experience of displacement or crisis.

SSAP does not run programmes specifically targeting adults at risk. However, adults at risk may participate in SSAP programmes, and in this case SSAP will work with project participants to understand their needs and work within the guidance and principles [‘Working Together to Safeguard People: Vol 6 Handling Individual Cases to Protect Adults at Risk’](#). This includes putting their needs first to ensure that they receive appropriate care, and where relevant, working collaboratively, and sharing appropriate information in a timely way with other professionals,

2.1.2. Who Abuses and Neglects Adults?

Anyone can perpetrate abuse or neglect, including:

- Family members including parents, brothers, sisters, spouses/partners and children
- neighbours, friends, acquaintances
- local residents, community service users, strangers
- paid staff, professionals and volunteers, carers

Abuse can be perpetrated by one person or by several people. It is more likely that the abuser is known and may be in a position of trust and power, than for the abuser to be a stranger.

Abuse can happen anywhere, for example, in someone’s own home, in a public place, in a care setting, a community setting or on the streets. It can take place when an adult lives alone or with others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

In an international development context, adults can be at risk of abuse and harm through

potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes. Where SSAP works with partners they will work together to ensure a shared understanding of risk within the context of the work and ensure measures are in place to mitigate these risks.

See Appendix 8: Categories and Indicators of Abuse and Neglect.

2.1.3. Definition of a Child at Risk

The Social Services and Well-being (Wales) Act 2014 defines a child at risk as a child who is a person under the age of 18 years who:

- is experiencing or is at risk of abuse, neglect or other kinds of harm, and
- has needs for care and support (whether or not the authority is meeting any of those needs)

In an International Development context, the risks to children will vary according to the context of the project, however all children are at risk of harm and abuse through potential, actual or attempted abuse of power or trust. All children have equal rights to protection from harm.

2.2. A child centred approach

This principle recognizes that the rights of the child, and their best interests are paramount, and we must work to promote and respect the dignity of the child. We will have regard to the characteristics, culture and beliefs of the child and their family. It is important that as far as possible, we will try to understand and take into account the child's views, wishes and feelings and support them to participate in decisions that affect them.

SSAP does not work directly with unaccompanied children in any activity. However, children may be present at events along with caregivers. In this case, if a staff member has a concern about the wellbeing of any of the children present, through witnessing abuse, or seeing signs, or if a child discloses an issue to them they will report this in line with the [Wales Safeguarding Procedures Volume 5](#), by voicing this concern to the DSP for that activity. See Roles and Responsibilities at SSAP

In all information gathering and any response, SSAP will follow the best practice principles of working with children, in putting the needs and wellbeing of the child first, and using professional judgement to ensure the right solution is found for them. The staff concerned would follow the procedures in Roles and Responsibilities at SSAP, and the resulting response would seek to understand the trusted relationships of the child and will share appropriate information and seek advice from Social Services and any agency involved in the care of the child in regards to taking any action.

Please see Appendix 8: Categories and Indicators of Abuse and Neglect.

2.3. How Safeguarding Concerns May Arise at SSAP

We may encounter Safeguarding concerns through our programme of work in Wales. Our members may also encounter Safeguarding concerns and where necessary we would refer them for support to Hub Cymru Africa or to WCVA and CVCs. Our implementing partners in Africa may also encounter Safeguarding concerns and we are responsible to work with them to ensure they meet international minimum standards for Safeguarding.

SSAP has developed a risk register which considers Safeguarding risk within all aspects of the programme. This includes all aspects of the organisations activities, both in person and online, including events, training, communications, and fundraising. This risk register is maintained by the DSP, who are responsible for updating it regularly with input from the staff team.

A separate risk register considers risks to staff during the course of carrying out their work.

For some examples of how safeguarding concerns may come up see [Appendix 7: How might Safeguarding concerns arise at SSAP](#)

3 Prevention

SSAP will implement policies and procedures to minimize the risk of safeguarding concerns from occurring as follows:

3.1. Ensure safer recruitment

- Include SSAP safeguarding commitments in job adverts, job descriptions and terms of reference as applicable.
- Seek to recruit all paid staff and volunteers using appropriate procedures, safeguards and checks. SSAP will follow guidance on roles that require DBS checks. <https://www.gov.uk/government/collections/dbs-eligibility-guidance>. Any staff that are likely to visit SSAP projects overseas and meet with project participants will be required to have a basic check. This information will be included in job adverts and job descriptions.
- Assess any criminal record information that is disclosed in line with our Data Protection and Equality and Diversity policy and based on whether the offences revealed are serious enough to prohibit recruitment for that particular role. People with prior conviction for any crime against children, or sexual exploitation or abuse against an adult will not be hired by SSAP. SSAP requires re-checks every three years
- Discuss the content of any disclosure with the applicant before withdrawing any offer of employment
- Ask appropriate screening questions during selection/interview processes for relevant roles.
- Take up references for all SSAP posts, volunteer roles and trustees which includes a question on safeguarding.
- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and uphold the SSAP's Code of Conduct.
- Set a probationary period of (at least) six months for all staff.

3.2. Staff training and induction

All staff should receive training and development to help them fulfil their role. SSAP offer the safeguarding learning opportunities listed below offered through training, briefings, online, reading

etc. Records will be kept of attendance.

Each role within SSAP will be risk assessed according to the [Social Care Wales National Safeguarding Training Learning and Development Standards](#). We will determine which staff fall into the relevant groups and make arrangements for them to work up through the hierarchy to meet the safeguarding learning that best fits their role. These are defined as:

Group A: Basic awareness: All staff working in the voluntary sector.

Group B: Intermediary: All staff having regular contact with adults, children and members of the public in their roles.

Group C: Advanced: Staff with an assessing, planning, evaluating role in Safeguarding.

At a minimum all staff will undertake training at group A at induction.

See <https://socialcare.wales/learning-modules/group-a-safeguarding>

Dates when induction and refresher training has been completed will be logged and monitored.

Everyone will receive, within 6 months of joining the organisation, safeguarding learning and development which will help them to identify abuse and neglect and report it using this policy and procedure and statutory guidance. Everyone will be expected to attend. All Staff that have received the safeguarding induction will sign a self-declaration form Appendix 13: Confirmation of having read and agreement to apply SSAP safeguarding policy and procedure.

Safeguarding matters and any updates to law, policy and procedures will be discussed at team meetings regularly.

Additional learning opportunities will be made available to staff who have routine contact with children and adults at risk to help them fulfil their roles and as identified in supervision and appraisal. Staff with specific safeguarding roles will have training appropriate to their role, including Africa portfolio staff having training relevant to that context, which can be accessed through Hub Cymru Africa.

3.3. Safeguarding training for Designated Safeguarding Staff

The DSP's and the DSL will receive training within 6 months of their role commencing and then refresher/update briefings every two years. This will focus on managing safeguarding including making decisions, making referrals and reports, contributing to the inter-agency process, consent, confidentiality and information sharing and staff support.

3.4. Specialist Safeguarding Training for Designated Safeguarding Leads & Trustees

Those roles that undertake recruitment will need to have undertaken 'safer recruitment' training. In addition, those senior staff and Trustees who may be required to undertake inquiries and manage allegations against staff will be required to have training in this area.

3.5. Safeguarding Governance briefings

Trustees will receive training to be able to fulfil their safeguarding governance responsibilities. This should take place for all Trustees and be updated every two years.

3.6. Code of conduct and behavioural standards

All staff will be required to sign a code of conduct on joining the organisation. This will be available publicly so that all project participants/service users are aware of the standards of behaviour that they can expect from SSAP staff. Where we hold in- person events we will have a copy of our Code of Conduct and reporting procedure visible to attendees.

Behavioural standards will also be shared at the start of all online events so that all participants are aware of what is expected. This protects staff as well as participants from abuse. This will include information on how to report concerns, and the consequences of breaching the standards (removal from the event, blocking from future events).

3.7. Images and informed consent, digital media

SSAP will adhere to the Communications guidelines in always ensuring dignity and respect in taking images. Informed consent will be gained and recorded before any images are used publicly. No image will be shared in public, including on website and social media, without consent. No identifying information will be shared without the consent of the people in the images.

3.8. Staff wellbeing and protection

Risk mitigation for harm to staff will include staff training and code of conduct, and measures in the Harassment at work Policy, Personal Safety policy, Anti-social behaviour policy. A supportive and open culture will encourage speaking out on issues of concern.

4 Roles and Responsibilities at SSAP

4.1. Everybody's Responsibilities

- Everyone working at or for SSAP is responsible for safeguarding and managers will support their teams to undertake these responsibilities and agenda safeguarding regularly at team meetings. Non-compliance with this policy and procedure will be dealt with as a performance issue. Everyone should:
 - Be familiar with and follow this policy and procedure.
 - Be vigilant in the course of their work to signs and indicators of abuse and neglect.
 - Act in a timely way to address any safeguarding concerns in line with this policy and procedure.
 - Treat everyone with whom they come into contact with respect and apply SSAP's code of conduct.
 - Attend safeguarding learning and development opportunities.
 - Seek advice and support to help them address any safeguarding concerns.

4.2. Responsibility of the Organisation

SSAP is required to comply with safeguarding legislation, the multi-agency safeguarding procedures, the regulations set out by the Charity Commission, and the contractual requirements of funding bodies. We also work with sub-Saharan partner organisations and, where there is a funding relationship, we work together to ensure the partnerships are operating safely. We are responsible for providing a safe

and welcoming environment for people we support and for those who work for us, including making sure our staff and volunteers are recruited safely and equipped with training and support. We have a responsibility to act on information provided to us in order to safeguard children and adults at risk.

The people with delegated responsibility for Safeguarding in SSAP are as follows:

Designated Safeguarding Person (DSP) – International Projects			
Name:	Carol Adams	Tel:	07708 586777
Job Title:	Africa Portfolio Lead	Email:	Carol.adams@ssap.org.uk
Designated Safeguarding Person (DSP)			
Name:	Sarra Ibrahim	Tel:	07494 8799614
Job Title:	Jamii 2 – Project Lead	Email:	Sarra.ibrahim@ssap.org.uk
Designated Safeguarding Person (DSP)			
Name:	Lara Griffiths	Tel:	07881 224376
Job Title:	Administrator	Email:	lara.griffiths@ssap.org.uk
Designated Safeguarding Person (DSP) Hub Cymru Africa			
Name:	Julian Rosser	Tel:	07504109155
Job Title:	Acting Head of Partnership/Senior DSM	Email:	julian.rosser@hubcymruafrica.wales
Safeguarding Lead (DSL)			
Name:	Fadhili Maghiya	Tel:	078283 29923
Job Title:	CEO	Email:	Fadhili.Maghiya@ssap.org.uk
Lead Trustee for Safeguarding			
Name:	Dr Donals Mlewa	Tel:	077807 40916
Title:	Trustee	Email:	mlewa8@sky.com
Chair of Trustees			
Name:	Loyce Eades	Tel:	07905 040537
Title:	Co-Chair	Email:	loycegsb@icloud.com

4.3. Trustees

The Trustees are responsible for the governance of safeguarding at SSAP, ensuring that the organisation works safely. Their responsibilities include ensuring:

- A culture of safeguarding is promoted, and staff and service users can raise concerns.

- There are policies and systems in place, including code of conduct, whistleblowing and safer recruitment policies.
- A safeguarding policy is in place and is understood by staff; it is reviewed annually.
- safeguarding concerns are managed effectively; systems are in place for its management; there is sufficient resourcing of safeguarding including for training.
- a Designated Safeguarding Lead and Designated Safeguarding Persons are appointed.
- a Lead Safeguarding Trustee is nominated who maintains regular contact with the DSL.
- They monitor performance including by receiving and reviewing regular feedback on safeguarding activity (such as gaps, threats, risks), oversee a risk register and ensure remedial actions are taken.
- Trustee Chair makes enquiries in the event of an allegation being made against the CEO.
- compliance with the Charity Commission serious incident notification requirements, and other relevant bodies such as regulators, commissioners, grant-makers, insurance companies.

4.4. Designated Safeguarding Lead (DSL)

The DSL is the Chief Executive Officer who has strategic responsibilities for safeguarding at SSAP. The DSL role includes the following and the CEO will be supported by the Leadership Team in these duties:

- Promoting a safeguarding culture and keeping up to date with safeguarding matters.
- Setting the safeguarding policy and procedure direction in line with statutory guidance, ensuring annual reviews are undertaken, communicating the policy and taking responsibility for its implementation.
- Monitoring the effectiveness of and compliance with safeguarding policy and procedures as well as the code of conduct, safer recruitment, disciplinary and whistleblowing policies.
- Ensuring effective safeguarding systems and processes are in place, including secure recording, appointing DSPs, safeguarding training so that everyone is aware of their safeguarding responsibilities and provide accessible information to service users and members about safeguarding.
- Assisting and overseeing the work of the DSPs and quality assuring management of safeguarding cases, including decisions made.
- Overseeing the management of safeguarding allegations against staff.
- Briefing Trustees about safeguarding activity (data, gaps, themes and risks), maintaining a risk register.

4.5. Designated Safeguarding Persons (DSP)

The DSPs have operational responsibilities for safeguarding at SSAP. Their responsibilities include:

- Keeping up to date with safeguarding including the local multi-agency arrangements.

- Providing safeguarding training to staff.
- Being available to staff and providing advice and support on safeguarding to them
- Managing individual safeguarding cases including gathering information, assessing information, making decisions and taking actions, seeking specialist advice, liaising with children and adults at risk and/or their families, referring to police or social services if necessary, working with other agencies, escalating concerns if required and managing record keeping.
- Alerting the Designated Safeguarding Lead (DSL) to any safeguarding concerns relating to allegations against staff; poor practice concerns, staff training needs or any other matters related to the management of safeguarding.

4.6. Working in Partnership

Where SSAP works in partnership with other organisations to implement projects, they will ensure that a DSP is identified within those organisations and agree how they will communicate and work together on Safeguarding in their work in partnership, including reference to Safeguarding in any project agreements or MOU.

In the case of a report to a partner organisation, the DSP of the partner would be responsible for responding to the report in accordance with the partner organisation's Safeguarding policy and procedures. The process would be in line with the laws and statutes of the area of operations and taking all risks into account. Communication with the SSAP DSP will be agreed during the contractual arrangements, as above.

In the case where an SSAP staff member is travelling to a partner organisation for a project visit in Africa, both policies will apply. The SSAP policy will apply to that staff member in relation to incidents affecting the staff member. If any incident is witnessed, or reported involving project participants or partner staff, the partner policy will be followed.

5. Managing Safeguarding Concerns Procedure

5.1 Overview

See Appendix 4 for a Flowchart of this process in Wales.

For any safeguarding concerns, however small they may appear, staff must speak with the DSP, and if the DSP is unavailable, speak with the DSL. Don't worry about being mistaken or that speaking out will make things worse, usually an initial conversation with the DSP is helpful to clarify matters and put in plans for support - not every concern will result in referrals to social services or police. It is important that the DSP is responsible for making any decisions about safeguarding.

If following discussion with the DSP it is considered that the threshold for referring to social services or police has not been met, additional support can be provided by SSAP or other agencies. This should be offered to the child or adult, including signposting or offers made to refer them to an external agency.

SSAP will ensure that responses are survivor (victim) focused, keeping the needs of the survivor (victim) at the forefront of the response process; An up to date list of local organisations and contacts offering support will be made available to survivors (victims) (or, in the case of children, to their parent or guardian) including, but not be limited to, information about legal, counselling, medical and psychosocial support. Decisions regarding support will be led by the survivor (victim); See [Appendix 2: Key External Contacts](#).

5.1.1 Africa projects:

If an incident is reported to a staff member of SSAP during a visit and this involves a partner staff member, there is a mandatory duty to report this to the partner DSP in line with the partners Safeguarding policy. If the incident involves a partner staff or community member, then the partner Safeguarding policy and procedure will be followed and the response determined on a case-by-case basis in consultation with the DSL of each organisation.

If a partner organisation in Sub Saharan Africa is required to investigate an allegation of abuse against one of their own staff, they will be responsible for risk assessing and carrying out the investigation in line with their Safeguarding policy, and the legal and statutory requirements of their country. We will document in our MOU the process and expectation of reporting this incident confidentially to us in line with Charity Commission requirements, and any support we would offer to this process, if requested. If the incident involves an SSAP staff member as perpetrator and a project participant, then this will be reported to both organisations and both organisations policy and procedures followed.

5.1.2 Staff working based overseas for extended periods:

If a staff member is the victim/survivor of a Safeguarding incident, then they should report the incident to the DSP as the Safeguarding Policy. They should also report to the authorities according to the legislation and procedures for the country they are working in. If an incident is reported where the staff member is the subject of concern, SSAP will respond according to this policy and will investigate, refer and support any survivor.

5.2 Barriers to Speaking Out for Service Users

Many people are reluctant to disclose their experiences of abuse and neglect. See [Appendix 6: Barriers to Speaking Out for Service Users](#) to understand what may prevent service users from speaking. It is essential that we provide opportunities for people to report to us that are as accessible as possible, and that people know the standards of behaviour they should expect from us so that they know when these have been breached. It is also essential that we do not allow these barriers to influence us and that we take action, seek advice, and contribute to SSAP being a safe and listening organisation.

Often a child or adult at risk will approach someone that they trust or because they are available and supportive. It is important to be clear about our boundaries if someone tells us about abuse or neglect: the matter may need to be reported to another agency and there may be criminal or safeguarding inquiries that commence. This process is detailed below.

See Appendix 9: Reporting Do's and Don'ts + survivor centred approach for ways of managing and things to avoid when a person first talks to us about their experience of abuse or neglect, including providing space, time and a supportive environment for that person.

5.3 Whistleblowing

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by SSAP's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

5.4 Responding to a Safeguarding Emergency

In an emergency where a child or an adult at risk has been seriously hurt, is at immediate risk of abuse and delay could increase this risk, is in danger or a criminal offence against them has occurred, you should:

- Take any immediate action to protect the person from abuse and prevent harm to them or others.

This should be done without putting yourself in danger.

- Contact the emergency services - police and/or ambulance and inform a DSP. Thereafter follow the procedure set out in Appendix 4.

5.5 Duty to Report

It is not staff responsibility to decide whether anyone has been abused, or to undertake investigations, but everyone at SSAP is responsible for responding to and reporting concerns in line with this procedure. Concerns about abuse and neglect must be reported by staff to the DSP who will respond further in accordance with this procedure – this is not a matter of personal choice. Don't confront the alleged abuser or begin to make enquiries that are more appropriate to the role of the DSP to carry out in liaison with social services or police. Do not inform or involve parents, carers or others without first reporting and discussing thoroughly with the DSP.

The Social Services and Well-being Act 2014 sets out a 'statutory duty to report' for relevant partner agencies such as education authorities, police, and health services. SSAP is not under the legal statutory duty to report a suspected adult at risk, or child at risk through any contractual obligations. However, all agencies are expected to report any safeguarding concerns in the same way including both paid and non-paid practitioners in third sector organisations. This means that if any person has knowledge, concerns or suspicions that a child, including an unborn child or adult is suffering, has suffered or is likely to be at risk of abuse, it is their responsibility to ensure that the concerns are referred to the DSP who will then act according to the procedure in working with social services or the police who have powers to make enquiries and intervene when necessary. If a staff member has concerns it is good practice to contact a DSP to discuss the concern and seek advice and complete the [Appendix 3: SSAP Safeguarding Incident Report Form](#). The DSP will make the decisions on behalf of SSAP about the action to take. However, the staff member should take action without referring to the DSP in these circumstances:

- It is an emergency situation and contacting the DSP will result in undue delay
- There is no DSP, DSL or other manager available
- The DSP and DSL have not made a report that the staff member thinks are necessary.

Reports must be made immediately or as soon as possible after the concern comes to light and within 24 hours. The referral must be made by the DSP or where it is made by a staff member, the DSP must oversee the decision making and process. Staff at SSAP cannot remain anonymous when making a referral. It should not be assumed that someone else will make the report or that other agencies are already aware and will deal with the issue.

Safeguarding reports for adults and children must be made to the local authority social services where the safeguarding concern is thought to have occurred. If it is not clear which local authority to report, the local social services should be contacted for advice. Outside of office hours, the local authority emergency duty team should be contacted if a child or adult is at risk.

Information must be shared only with relevant staff at SSAP and with known, named individuals in external agencies on a need-to-know basis and observing data protection and confidentiality at all times. See [Appendix 1 Key contacts at SSAP](#), [Appendix 2: Key External Contacts](#).

Children and adults at risk must be supported through any safeguarding process. This may include supporting them to access an advocate, either informal or professional, acting as their advocate were agreed with SSAP, maintaining contact and relaying appropriate information, monitoring safety and refreshing safeguarding reports to other agencies, accordingly, supporting access to other specialist agencies.

5.6 Responding to Safeguarding Concerns about a Child or Adult, including Adults at Risk

For all safeguarding concerns, follow these steps:

- **Stage 1:** Speak to a DSP immediately and on the same day and within 24 hours of identifying the concern. Do not delay.
- **Stage 2:** Ensure that any non-emergency medical needs are met, and any medical treatment is provided to the child or adult at risk. This may involve discussing with parents/carers that they are addressing any medical needs of the person.
- **Stage 3:** Record details on the Safeguarding Concerns Form (Appendix 3) and pass to the DSP. The DSP will seek clarification and ensure all subsequent actions and decisions are recorded.
- **Stage 4:** The DSP will make decisions about the next steps, without delay and:
 - Consider if advice is needed from others at SSAP or externally e.g. social services.
 - If it does not create further risk, ensure that the safeguarding concern has been discussed with the service user or their parent/carer, their views and wishes obtained, that they have been told of our duty to pass on our concerns (if appropriate) and matters regarding consent to share information have been addressed properly. See 5.7 Confidentiality and consent.
 - For reporting purposes, ascertain that the individual meets the criteria as a person at risk.
 - Establish if others are affected for whom safeguarding should also be considered, e.g. children in the family, other adults at risk, other service users or staff at SSAP.
 - The DSP may make any of the decisions listed in [Appendix 12 Management of a safeguarding allegation against staff](#) and if the DSP is not sure, they can seek advice from social services:
 - There is no further action to take because there are no safeguarding concerns.

There may be concerns but they are of a degree and nature that do not meet the need for a referral to police or social services, or the individual (or their parent/carer) does not give consent to report and their right to confidentiality cannot be breached. SSAP can continue to provide support to the service user and/or signpost or refer them to other sources of help with their consent or encourage the person or their parent/carer to self-refer.

5.6.1 Africa projects

If a partner organisation in Sub Saharan Africa is required to investigate an allegation of abuse, they will be responsible for risk assessing and carrying out the investigation in line with their Safeguarding policy, and the legal and statutory requirements of their country. We will document in our MOU the process and expectation of reporting this incident confidentially to us in line with Charity Commission requirements.

If the investigation involves a concern about an SSAP staff member during a project visit, SSAP will follow their own Safeguarding procedure in Wales, and will work with the partner to organize the fact finding and investigation in the relevant country in line with CHS alliance standards. Funding for the investigation should also be provided in this instance.

5.7 Confidentiality, Information Sharing and Consent

When sharing information about service users with external agencies, the law on confidentiality and information sharing must be applied. Service users have a right to expect that their personal information is not shared with other agencies and that their consent is obtained beforehand.

We should aim to seek consent from the adult, the child if they are of an age and understanding to be able to consent or the child's parent where possible. Doing this is more likely to lead to engagement and promote an effective working relationship with the individual.

However, if it is at all possible that discussing consent with the parents/carers will raise the likelihood of threat towards a child, they must not be approached.

It is possible to make a report without consent in circumstances such as:

- There is a need for a 999 call, for immediate police protection, to report a crime, or to call for emergency medical attention
- It is in the public interest, e.g. a serious crime has been or may be committed
- The individual has experienced serious abuse and the level of risk to them is high
- The individual would be put at further risk, be threatened or otherwise coerced into silence
- Other people are at risk, including children or other adults at risk
- The person at risk lacks capacity (see 'Mental Capacity' below) to consent or make decisions
- The alleged abuser is an adult at risk, or a child, and needs support
- The risk has been posed by paid carers or professionals
- The concerns relate to a failure in care, breach of regulation or professional code of conduct.

The safety and welfare of the child or adult at risk is the paramount consideration in making any decisions whether to seek consent prior to making a report. The DSP must be involved in any decision about the appropriateness of seeking consent from the adult, child or their parent.

In Wales the DSP can seek advice from Social Services without disclosing the identity of the person.

Social Services should be informed when making a referral:

- Whether consent has been given or withheld
- Who was contacted to obtain consent, their response, wishes and desired outcomes
- If consent was refused, that the adult at risk and child and parent/s have still been informed of the report.
- If no attempts have made to seek consent, why.

For further information see Appendix 10 Best practice in consent and information sharing, including mental capacity

5.8 Recording

Recording is a key task in safeguarding, and it includes recording concerns, decisions, actions and reasoning. Records may be used in future legal proceedings and be accessed by other parties as well as the individual concerned. Record keeping and storage must be in accordance with Data Protection Policy and in line with good practice tips in recording, including using the persons own words and phrases, documenting as soon as possible and within 24 hours, be clear and concise, accurate and dated.

See [Appendix 11: Good Practice Tips in Recording](#):

Records must be retained securely on the file of the child or adult at risk for a minimum of 7 years (although requirements may vary under contracts from different partners, and there may be legal reasons for keeping certain records for longer). Records will be retained securely and be stored in a passworded digital file and can only be accessed by DSL and DSP.

5.9 Making a safeguarding referral

See 5.5., and 5.6.

A safeguarding referral is made to social services to request an assessment of potential care and support needs for the service user. A referral will be made by the DSP in consultation with the DSL if there is reasonable cause to suspect that the person has experienced or is at risk of abuse or neglect or are serious concerns about their wellbeing. Parents and carers should not be informed of a referral where it is suspected they have caused the harm. The DSP will not investigate the concerns.

Appendix 3, the Safeguarding Reporting Form may be forwarded to social services or police in addition to

the social services referral form. Consent to make the referral will have been sought and given unless the exceptions noted in section 5.7 have been met.

The referral must be made immediately by the DSP using the multi-agency procedures and telephone reports must be followed up in writing within 24 hours. The referral is made to the local authority social services where the safeguarding concern has occurred, and the referrer should ensure that it has been received. [Appendix 2: Key External Contacts](#) lists the contact details of social services. Social Services should acknowledge within 7 working days that the report has been received and of their decision. If this is not done, the DSP must follow this up with social services.

The Referral should be clear and thorough and include:

- The full name, address and date of birth of the child or adult at risk
- Additional needs arising from health needs or disability, language needs, ethnicity, race, religion or other needs
- The names, addresses and dates of birth of family members, carers and relevant others
- Details of relevant professionals (e.g. GP, CPN, school)
- The nature of the concerns, how concerns have arisen
- Relevant background history or context, risks
- Your views and assessment and what you consider needs to happen next
- If there is consent to share information, or if the person has been informed the referral is being made
- Your identifying details and contact details.

The DSP or staff may need to provide reports or attend meetings, contributing to and assisting with safeguarding enquiries in line with the multi-agency procedures.

If a referral is not accepted by social services or there are delays that impact on the safety of the individual, social services should give reasons and information to the DSP. If the DSP remains concerned, they should actively pursue further discussions including escalating via line management or using the Regional Safeguarding Board's Protocol for Resolving Professional Differences to ensure that the safeguarding concerns have been addressed thoroughly.

Refer to the police or other emergency services if there is an emergency situation requiring immediate action.

At any time, the DSP can seek advice from internal staff at SSAP, social services, police or any of the specialist services (see agencies listed in Appendix 2).

Stage 5: Records must be kept of all conversations, actions and reasons for decisions. A decision to take no further action is as serious as a decision to take action and must be recorded.

Stage 6: The DSP has a role at SSAP to debrief staff and to offer support and supervision during and after any safeguarding incidents and to update the DSL. The DSL will debrief and support the DSP in their role. Staff involved in safeguarding matters including referrals to social services or police should have an opportunity to debrief and receive supervision and support to help with any personal impact or organisational learning.

6 Procedure for Managing Allegations against Staff

See [Appendix 5: Flowchart for Managing Allegations Against Staff](#). This procedure should be used if there are safeguarding concerns against staff (which includes volunteers and trustees). There may be concerns due to staff behaviour which may be causing harm to service users, adults or children in their private life, the public or staff in our organisation. This procedure also applies to behaviour that seems to be

well-intentioned, but which breaches safe working practices or our Code of Conduct.

All staff should apply safer working practices so there is no misunderstanding about well-intentioned behaviour. Staff should be familiar with our Code of Conduct and are required to sign this as a condition of working or volunteering with SSAP.

In the same way we have a duty to report safeguarding concerns about service users, we also have a duty to report concerns about any colleague of SSAP. It is each person's responsibility to ensure that SSAP is a safe organisation, and we must not ignore or dismiss suspicions about a colleague who may be abusing, neglecting or causing harm to a child or adult at risk. These concerns may be about the colleague's behaviour at work or in their life outside of work. They may be clear and serious concerns about a staff member, or they may be low level concerns.

Safeguarding concerns can include where a member of staff may have:

- Behaved in a way that has – or may have - harmed an adult or a child or behaved in a way that could lead to an adult or child being harmed
- Possibly committed, or is planning to commit a criminal act to an adult or a child
- Behaved toward an adult or a child in such a way that it indicates that they could pose a risk of harm to service users or be unsuitable to work with service users or in any capacity whether this has occurred whilst working at SSAP or elsewhere, including online.

These concerns about staff may arise in various circumstances, for example:

- Someone makes an allegation against them
- There are concerns about their working practices, they have breached the Safeguarding Policy and Procedure or the Code of Conduct.
- There are concerns about their behaviour outside of work e.g. they have harmed a child or an adult at home or in another organisation or they have accessed illegal online material.
- They no longer work at SSAP, and allegations come to light about them (historical concerns).
- Their child is subject to child protection procedures, or they have care responsibilities for an adult at risk who has been harmed in their care
- They are subject to criminal procedures that indicate they could be a risk to others
- New information is contained in a Disclosure and Barring Service (DBS) renewal check.

These concerns may be unfounded, or allegations may be false or malicious, but they may also be founded. The outcome cannot be known until a proper enquiry has been undertaken using this procedure. It is important that allegations are taken seriously and not ignored. They must be dealt with fairly, consistently and in a timely way.

6.1 Responding to a safeguarding concern about staff

If anyone needs immediate emergency support, call 999 straightaway. Where there are safeguarding concerns about staff, follow the steps below.

Speak to the DSL about your concern. If the concern is about the DSL the Chair of Trustees must be notified, or another Trustee if the Chair is not available or the concern is about them. The subject of the allegation should not be notified by you, but will be informed in a timely way once decisions have been made by the DSL and DSP about the severity of the allegation and the response. The report from you to the DSP or DSL should be made immediately and on the same day that the concern is identified. Record details on the [Appendix 3: SSAP Safeguarding Incident Report Form](#). If you are not satisfied about your concerns being taken seriously or addressed by the DSL or trustees, you can contact social services directly or use the whistleblowing procedure.

6.1.1 Enquiries by the DSL

The DSL (or Trustee if the allegation is about the DSL) will be the lead in the management of the allegation, dealing with matters quickly, fairly and consistently so that individuals are safeguarded, evidence is secured, and the staff member is supported. This will involve working with others, both internally at SSAP as well as external agencies including police, local authority and the Designated Officer for Safeguarding (DOS). The DOS is the nominated person in the local authority who is responsible for managing and monitoring safeguarding allegations about paid and unpaid staff who work with children and adults at risk; the DOS will provide advice, information and guidance to employers about safeguarding allegations.

SSAP will follow the strands of enquiry detailed in the Wales Safeguarding Procedures section 5, details of this process are in [Appendix 12 Management of a safeguarding allegation against staff](#)

SSAP has a duty to refer to DBS any person engaged to work in regulated activity where the allegation has been substantiated or where there has been harm caused. DBS will consider whether the person should be barred from working with children or adults at risk.

Failure to report to DBS in these circumstances is an offence. The referral process is outlined on the DBS website, and they can be contacted for advice if there is uncertainty as to what to do.

6.2 Other Considerations

6.2.1 Lack of co-operation

In all cases, recording the allegation, identifying any evidence and making a judgement as to whether it is substantiated should continue as far as possible. Full opportunity will be given to the person to respond to the allegation. Every effort will be made to conclude all cases where allegations are made, even where:

- The person concerned refuses to cooperate, resigns or otherwise stops providing their services.
- It is difficult to reach a conclusion.
- The person is deceased.

6.2.2 Compromise Agreements, Settlement Agreements or Non-Disclosure Agreements

These are agreements whereby a person agrees to resign with the agreement that the employer will not pursue disciplinary action, and where both parties agree a form of words to be used in any future reference. These types of agreement must never be used in these cases nor can SSAP duty to report to DBS, where the criteria is met, be overridden.

6.2.3 References

Where allegations are considered to be false, unsubstantiated or malicious, these should not be included in employer references. If the allegations are upheld and the employee is dismissed, SSAP should consider joining the Misconduct Disclosure Scheme in case the employee applies for employment overseas, particularly if their work is likely to be directly with at-risk groups.

6.2.4 Record Keeping

Details of allegations that are found to have been malicious should be removed from personnel records.

Thorough records must be kept of other allegations, including the allegation, how it was managed, actions taken and decisions reached. This should be kept on the confidential personnel file of the

subject of the allegation. The record should be kept at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. If references are sought for future employment and the claims have been substantiated, this should be stated in the reference.

7 Staff Supervision and Support

SSAP is committed to supervising and supporting staff when there have been safeguarding concerns, and we recognise that this work can be challenging in many ways.

All staff receive supervision, and safeguarding will be a key part of supervision. Staff are encouraged to discuss any safeguarding concerns with their supervisors, whether that is formal supervisory meetings or ad-hoc. Supervision notes in relation to a case will be transferred to the individual's case file. Notes will be kept in the staff members' personnel file but will be recorded in such a way as to prevent identification of the individual child or adult at risk.

This is to ensure that everyone is kept informed about safeguarding issues, that learning needs are identified, that we remain vigilant about concerns and workplace practices, that the impact of safeguarding work, including possible distress is managed and that we collectively work to create a safeguarding culture in our organisation.

Staff can also approach the DSP and DSL in relation to safeguarding matters.

Supervision and debriefing are available and will be provided after safeguarding incidents or events, including attendance at multi-agency meetings.

Any staff member or volunteer who has been involved in reporting a concern should be offered the opportunity to talk over their experience with their supervisor. The DSL will ensure that if there have been allegations against staff, that colleagues who have been involved in the issues surrounding the allegation are supported, supervised and effectively de-briefed.

A learning review may take place after a safeguarding concern, to learn lessons and improve practices, amend policies and procedures or lead to staff training. This policy and procedure, or other policies may need to be reviewed in relation to the learning.

8 Appendices

8.1 Appendix 1: Key contacts at SSAP

Designated Safeguarding Person (DSP) – Hub Cymru Africa			
Name:	Julian Rosser	Tel:	07504 109155
Title:	Head of Partnership	Email:	julianrosser@hubcymruafrika.wales
Designated Safeguarding Person (DSP) – International Projects			
Name:	Carol Adams	Tel: Mobile:	07708 586777
Job Title:	Grants and Research Officer	Email:	Carol.adams@ssap.org.uk
Designated Safeguarding Person (DSP)			
Name:	Sarra Ibrahim	Tel:	07494 8799614
Job Title:	Volunteer Coordinator	Email:	Sarra.ibrahim@ssap.org.uk
Designated Safeguarding Person (DSP)			
Name:	Lara Griffiths	Tel:	07881 224376
Job Title:	Administrator	Email:	Lara Griffiths lara.griffiths@ssap.org.uk
Safeguarding Lead (DSL)			
Name:	Fadhili Maghiya	Tel:	078283 29923
Job Title:	CEO	Email:	Fadhili.Maghiya@ssap.org.uk
Lead Trustee for Safeguarding Designated			
Name:	Dr Donald Mlewa	Tel:	077807 40916
Title:	Co-Chair	Email:	mlewa8@sky.com
Chair of Trustee's			
Name:	Donald Mutake	Tel:	07913 172852
Title:	Co-Chair	Email:	donaldmutale@gmail.com

8.2 Appendix 2: Key External Contacts

Emergency Services	
Police (non-emergency)	Tel: 101
Emergency Services	Tel: 999
Police Public Protection Unit	Tel: 02920 527410
Police Anti-terrorism Hotline	Tel: 0800 789 321
Police Prevent Team	Tel: 101
Local Authority	
Local Authority Adults Social Services	Tel: 02920 234234 Email: EmergencyDutyTeam@cardiff.gov.uk Emergency Out of Hours: 02920788570
Local Authority Children's Social Services	Tel: 02920 536490 Email: EmergencyDutyTeam@cardiff.gov.uk Emergency Out of Hours: 02920234234
Wales Local Authority and their social media links	https://www.cardiff.gov.uk https://twitter.com/
Regional Safeguarding Boards	<ul style="list-style-type: none"> • Cardiff & Vale - www.cardiffandvalersb.co.uk • Cwm Taf Morgannwg - www.cwmtafsafeguarding.org • Gwent - www.gwentsafeguarding.org.uk • Mid & West Wales - cysur.wales • North Wales www.northwalessafeguardingboard.wales • Western Bay - www.wbsb.co.uk
Radicalisation	
HM Govt Report radicalisation concerns online	https://act.campaign.gov.uk/
Home Office Radicalisation e-learning module	https://www.elearning.prevent.homeoffice.gov.uk
Adult Safeguarding	
Wales Safeguarding Procedures adult and child	www.safeguarding.wales
Ann Craft Trust Resources and support for safeguarding adults	Tel 0115 951 5400 Website: http://www.anncrafttrust.org/safeguarding-adults-sport-activity/
NAPAC (National Association for People Abused in Childhood) Helpline and online support	Tel 0808 801 0331 Email support@napac.org.uk
Mencap Direct Helpline and support	Tel: 0808 808 1111 E-mail help@mencap.org.uk www.mencap.org.uk
MIND Helpline and support	Tel 0300 123 3393 Text 86463 E-mail info@mind.org.uk www.mind.org.uk
National Autistic Society Helpline and support	Tel 0808 800 4104 Website www.autism.org.uk
Children's Safeguarding	

NSPCC Helpline For anyone concerned about a child	Tel 0808 800 5000 Email help@nspcc.org.uk
Childline For children to use	Tel 0800 1111
NSPCC Whistleblowing Helpline	Tel 0800 028 0285 Email help@nspcc.org.uk .
NSPCC FGM Helpline	Tel 0800 028 3550 Email fgmhelp@nspcc.org.uk
Triangle Support and advocacy re disabled children	Tel 01273 305 888 https://triangle.org.uk/
Family Lives	Tel 0808 800 2222
Child Trafficking Advice Centre	0808 800 5000.
Child Exploitation and Online Protection Centre (CEOP)	0870 000 3344
Other National Services	
Victim Support	Tel 0808 168 9111 www.victimsupport.org.uk
National Domestic Violence Helpline	Tel 0808 2000 247
Live Fear Free Providing help and advice about violence against women, domestic abuse and sexual violence	https://www.gov.wales/live-fear-free 0808 80 10 800 24 hours call, text, live chat, email.
FGM FORWARD Training and Support	Tel 020 8960 4000 Email forward@forwarduk.org.uk
Forced Marriage Helpline	Tel 0800 599 9247
Forced Marriage Unit	Tel 0207 008 0151 Out of office hours contact: 0207 008 1500 (ask for Global Response Centre).
UNSEEN Modern Slavery	Telephone: 0303 040 2888 Helpline: 08000 121 700 Website: https://www.unseenuk.org/
British Institute of Learning Difficulties Training and Resources	Tel 0121 415 6960 www.bild.org.uk
The UK Safer Internet Centre	0844 381 4772
Disclosure & Barring Scheme	https://www.gov.uk/government/organisations/disclosure-and-barring-service

8.3 Appendix 3: SSAP Safeguarding Incident Report Form

Safeguarding Concern/Incident Form

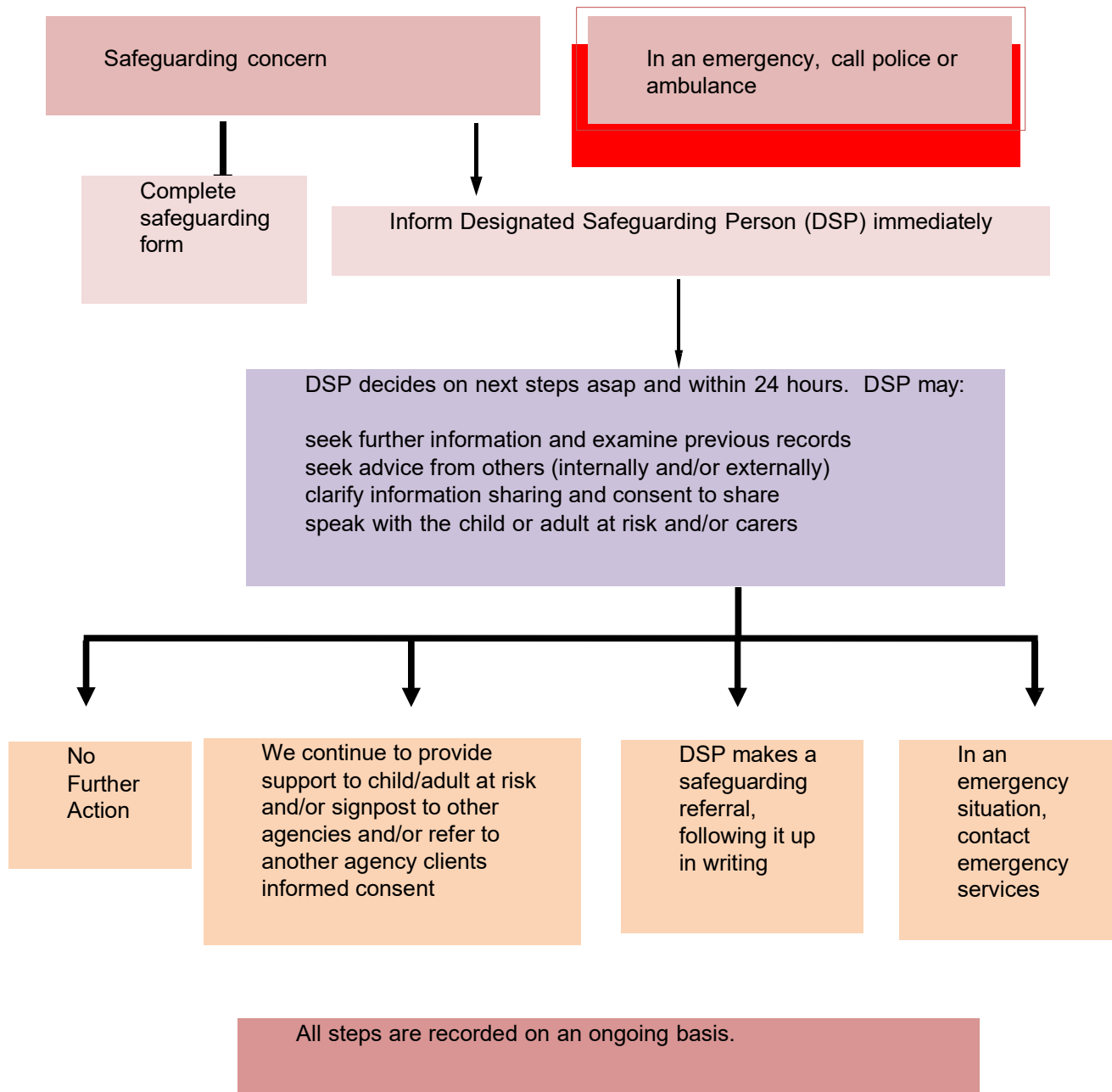
To be completed as soon as possible following the safeguarding incident and within 24 hours

Details of the Child/Adult at Risk		
Name of Child/Adult at Risk		
Age	Date of Birth	Gender
Religion	Ethnicity	Language
Home address and telephone number of adult at risk:		
Any additional needs (e.g. disability, interpreter needed)		
Parent/Carer's name(s):		
Any other family member names:		
Details of a safeguarding concern		
Describe the safeguarding concerns. Include: <ul style="list-style-type: none">• How did the concern come to light?• Dates/times of incidents, dates/times of actions taken etc.• Details of specific incidents.• Physical signs or behaviours that were noted		
Have you spoken to the child/adult at risk? If so, what was said or agreed?		
Have you spoken to the parent/carers? If so, what was said or agreed?		
Details of the person/s that the concern or allegation is against:		
Full Name		
Role or Relationship to the alleged victim Age/Date of Birth		
Address Telephone Number		

<p>Consent to Share Information</p> <p>Have you asked for consent from the child or their parent or the adult at risk to pass on information? YES/NO</p> <p>Has consent to pass on information to other agencies been given? YES/NO</p> <p>Are you passing on concerns without consent or after consent has not been given because you consider this is required? YES/NO If yes, please give your reasons. Please explain if there are any issues or concerns about consent.</p>			
<p>Have you sought advice from anyone? Give details of who (full name and contact details), when and the advice they gave.</p>			
<p>Details of Partner Agencies</p> <p>Please list names and contact details of any partner agencies that you know are involved.</p>			
Name of Partner Agency	Name of Person in agency	Contact details	How are they known to the child/adult at risk?
<p>Your Details</p>			
Your Name:	Your Position:	Your contact details	
<p>Report</p>			
<p>Are you reporting your own concerns or responding to concerns raised by someone else?</p> <p>If responding to concerns raised by someone else, please provide their name, role and contact details (if known):</p>			
Name of Designated Safeguarding Officer/Lead you are reporting this concern to			
Date and Time reported to the Designated Safeguarding Officer/Lead			
Your Signature			
Signature of Designated Safeguarding Officer/Lead			

8.4 Appendix 4: Flowchart for Managing Safeguarding Concerns

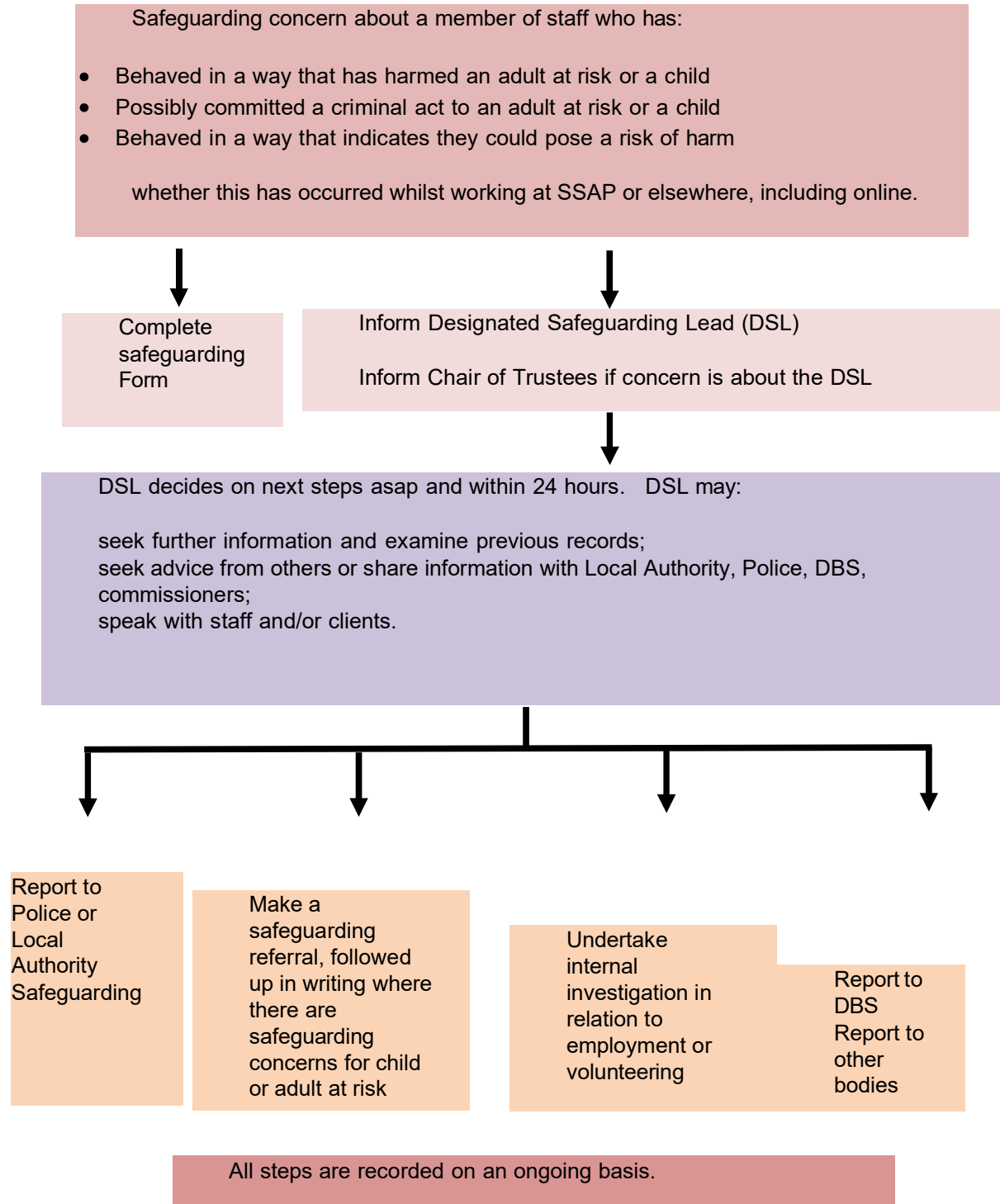
Flowchart for Managing Safeguarding Concerns (see policy and procedure for detailed guidance).



8.5 Appendix 5: Flowchart for Managing Allegations Against Staff

Flowchart for Managing Allegations Against Staff (includes Volunteers)

(see policy and procedure for detailed guidance).



8.6 Appendix 6: Barriers to Speaking Out for Service Users

Barriers to Speaking Out for Service Users

Many adults at risk and children are reluctant to disclose their experiences of abuse and neglect because they:

- feel shame, guilt or responsibility for the abuse.
- feel embarrassed about talking to someone about what happened.
- do not have anyone that they can turn to or that they can trust.
- may have sought help before but felt let down.
- fear not being believed or being taken seriously.
- fear the consequences of telling, fear the situation could become worse.
- believe they are protecting others (e.g. the abuser, family service users).
- are frightened because they have been threatened.
- have been groomed not to tell.
- believe things would get worse for them if they were found to have told.
- lack language skills e.g. have communication impairment, don't speak English or Welsh fluently.
- the abuse or neglect is all they have known, and they have accepted it as a norm.
- there are physical barriers to accessing reporting mechanisms (e.g. phone credit, internet access), or physical impairment prevents reporting
- They don't know who to report to, or understand the expected standards of behaviour
- They fear losing access to the service if they report
- The abuse is taking place in a context where there are high levels of violence and abuse, and so it feels 'normal'
- Cultural attitudes to sexuality, masculinity and gender increase the risk of reporting

Barriers to Hearing

Staff may feel reluctant to hear and act upon accounts of abuse, this may be because we:

- don't understand or recognise the signs and indicators.

- think that it is acceptable.
- are over-optimistic about the concern, thinking it will resolve itself or that it is a one-off.
- don't know how to react.
- want to manage the situation alone.
- fear actual or perceived threats from the abuser.
- feel overwhelmed.
- don't know who to tell.
- have loyalty to the person who is accused and justify the harmful behaviour.
- don't believe the abuse or neglect has happened or that a person we know could have abused.
- are persuaded by the abuser that it won't happen again.
- fear getting it wrong or making it worse.
- are worried about breaching the person's confidentiality.
- are concerned that the report will not be taken seriously or that no help will be given.
- lack knowledge or trust in the multi-agency safeguarding system.
- don't want to be involved.

It is essential that we do not allow these barriers to influence us and that we take action, seek advice and contribute to SSAP being a safe and listening organisation.

8.7 Appendix 7: How might Safeguarding concerns arise at SSAP

- A project participant tells you they are currently experiencing abuse.
- A project participant tells you of previous abuse they experienced and say that they have never told anyone else before.
- Someone else tells you that a project participant has experienced abuse.
- An adult project participant tells you they were abused when they were a child, you find out that the abuser currently has access to children.
- You notice a project participant seems low in mood and has some bruising.
- A project participant has children, and is struggling to cope (e.g. mental health difficulties) and you worry about how they may care for the child.
- A young adult tells you that their mum is subject to serious forms of domestic abuse. You understand that their mum also lives with a small child.
- An adult tells you they have harmed a child or another adult.
- A project participant tells you that a staff member is making them feel uncomfortable, for example they are connecting on social media with them, giving them lifts, taking them out outside of work hours.
- You observe a project participant bullying another project participant.
- You are concerned that a colleague's partner is behaving in a way that leaves you with concerns about your colleague's well-being.
- You observe that the behaviour of staff to the project participant is harsh.
- A member of staff tells you they borrowed money from a project participant.
- Partner staff receive reports of abuse and harm, or observe this in the course of their work either about other staff or volunteers, about visiting staff from SSAP, or about community members
- A photo is displayed on your or a partner's social media that identifies the person and location, or is not dignified in its portrayal of the person.
- Informed consent is not given for images or quotes to be shared publicly by SSAP or partners.
- A person uses abusive and offensive language at an online event, or exposes genitals which are visible to participants and staff.

8.8 Appendix 8: Categories and Indicators of Abuse and Neglect

The Statutory Guidance [Working Together to Safeguard People](#) sets out these categories of abuse and neglect that children and adults at risk may experience: physical abuse, sexual abuse, psychological abuse, financial abuse and neglect. The Wales Safeguarding Procedures additionally refer to the categories of domestic abuse (including 'honour' based violence, forced marriage and female genital mutilation) modern slavery and self-neglect.

These, plus additional categories, along with their definitions and signs and indicators are expanded in the links below. The signs and indicators listed are not an exhaustive list. Any one sign cannot be taken on its own as proof that abuse is occurring but should alert us to make further assessments. People may show signs as a result of distress and trauma not related to abuse, some people may not show any signs, for some people signs of abuse may be misinterpreted due to medications or disability.

Multiple forms of abuse may occur, making it important to look beyond single incidents or types of abuse. Any or all of these types of abuse may be perpetrated deliberately or through negligence or ignorance, it is the welfare of the adult or child at risk that is of paramount concern however and not the motivation of the abuser.

See following links for further information:

[Signs and Indicators of Possible Abuse and Neglect in an Adult at risk](#)

[Key definitions relevant to safeguarding children](#)

[Signs and indicators of possible abuse, neglect or harm in children](#)

8.9 Appendix 9: Reporting Do's and Don'ts + survivor centred approach

DO...

- Make time and space to listen carefully and understand what is being said.
- Actively listen without interruption and allow the person to say what they recall.
- Through your language and body language, show you take the matter seriously and are calm.
- Respond naturally, with compassion and empathy. Reassure the person they are right to tell you/someone.
- Be aware that the person is likely to be anxious and they may have been threatened or bribed not to tell.
- If you need to ask questions, use open questions, such as those starting 'who', 'when', 'where', 'how'. Avoid asking 'why' questions. Questions such as 'tell me more about that' are open questions which help people to speak using their own words.
- Ask the person what they would like to happen.
- Adapt your language so you communicate with the person effectively. Summarise using the person's own words.
- When you have enough information to know what action is needed, you can close the conversation. Explain what will happen next, including that you will have to tell someone.
- Consult immediately with the Designated Safeguarding Person.
- Record the conversation immediately on the Safeguarding Concern Form (Appendix 3).

DON'T...

- Push the person to tell you more than they want or keep on questioning them if they are reluctant. Let them know that you will be available when they are ready to talk with you further.
- Interrupt the person when they are talking freely.
- Ask leading questions (these are questions that presume an answer).
- Show strong reactions or feelings such as shock, denial.
- Speculate or blame anyone.
- Ask to look at injuries, especially if it entails them lifting/removing clothing.
- Ask them to repeat their account.
- Promise confidentiality or make other promises such as 'it will all be okay now'.
- Say you know how they feel, you know people who have been through similar etc.
- Give advice about what they should do.
- It is important to:
 - Secure and preserve anything you believe might be evidence.
 - Keep an open mind about what you see and hear.
 - Take the matter seriously. It is not for staff to judge the reliability of a safeguarding allegation, that is for the relevant authorities to decide after investigation.
- Remember that reporting concerns is not a betrayal of trust. We have a duty to report.

8.10 Appendix 10: Best practice in consent and information sharing

When wanting to share information, the best practice is to speak with the adult at risk or child and their parents to:

- explain why information needs to be shared and with whom
- check that factual information is accurate and up to date
- ensure the information is proportionate for the purpose
- clarify how the information will be used
- specify what information will be passed on
- specify how it will be shared and how it will be stored securely
- outline the implications of not giving consent
- explain next steps.

Where information is shared – with or without consent - what is shared must be only that which is necessary, proportionate, relevant, adequate, accurate, timely and then it must be shared securely.

If information is not shared because consent has not been given and it is judged that it cannot be shared, advice, signposting and guidance can be offered to support the service user. Further opportunities to discuss matters, including concerns about safeguarding and to share information in future should be given.

A record of the decision about sharing information must be kept which includes the reasons for the decision. If information has been shared, record what has been shared, with whom and for what purpose. If a service users consent to share information is overridden, this must be thoroughly recorded.

Mental capacity is a legal concept set out in The Mental Capacity Act 2005 and relates to a person aged over 16 years. It refers to the ability of person at a point in time to understand, retain, use and communicate information to make an informed decision on a specific issue and understand the consequences. Mental capacity relates to the ability to make a specific decision at a particular time. A person may have capacity to make some decisions but not others or can make decisions on some occasions but not others. In order to make a decision some adults at risk may need additional support such as advocacy, simplified explanations, visual aids and additional time. They are entitled in law to receive this support.

Adults are presumed to have mental capacity until it has been assessed that they do not. All practicable steps must be taken to help the person make the decision. Presumption of mental capacity also means that adults can make what may be seen as unwise decisions (everyone has the right to make their own decisions even if others think they are the 'wrong' decisions). Anything done for, or on behalf of, a person who lacks mental capacity must be in their 'best interests' and the 'least restrictive' of their rights and freedoms.

8.11 Appendix 11: Good Practice Tips in Recording:

Records:

- of discussion with the person or observations must be made immediately and within 24 hours.
- as far as possible, use the person's own words and phrases.
- must include what the person has said, your responses, dates, times, what prompted the conversation and what was happening at the time.
- should be objective and differentiate between fact, professional opinion, observations, hearsay and third-party information.
- must be legible, in plain language and free from jargon. Acronyms or initials should not be used unless they are properly explained.
- should be clear, accurate, concise and up to date.
- must state the date, time, place and who was present.
- must state the reasons for the decisions made, including decisions to take no further action.
- state what actions are to be taken, and by whom.
- be made only on SSAP systems and be held by SSAP. Records should never be kept at home or in places outside of SSAP, or be made on personal equipment such as phones or records.
- be accessed only by those who are authorised and, on a need,-to-know basis.
- must never be amended. Additional information or corrections of fact must be written as a separate record and explaining why the additional note is being made.
- Handwritten notes must be retained even if these have been typed at a later time.

8.12 Appendix 12 Management of a safeguarding allegation against staff

[Following Wales Safeguarding Procedures Section 5](#)

Four strands of enquiry

There may be up to four strands in the management of a safeguarding allegation and any or all of them may be required depending on the circumstances.

1. Enquiries by social care about safeguarding a child or adult at risk.
2. A police investigation if a criminal offence may have been committed
3. SSAP internal inquiry including considerations about disciplinary action
4. Referral to the Disclosure & Barring Service and/or referral to a professional registration body for professional misconduct.

An initial plan for the enquiry with proposed actions and timescales must be confirmed by the DSL within one working day. This should consider at least these areas:

- Which of the four stands of inquiry are required (this may change as the enquiry progresses).
- Making a referral to the local authority Designated Officer for Safeguarding (DOS). The DOS must be contacted within 24 hours of the incident occurring or becoming known. The DOS will advise and if the threshold for their involvement is met, will convene a meeting to ensure all the relevant reports and lines of inquiry are undertaken.
- If any immediate action is required to safeguard service users, other staff, the building or services
- If advice or information is needed from others e.g. other agencies, trustees, staff
- Securing any records or removing equipment or devices from the subject of the allegation or their access to parts of the building or shared drives etc.
- What information to share with the subject of the allegation and with any other known employer (if they work elsewhere)
- Arrangements to support the subject of the allegation, decisions about suspension or altering their duties
- What information to share with other staff or service users
- How to manage media interest if it should arise
- If the criteria is met for a serious incident report being made to the Charity Commission.

Strand 1: Enquiries by social care about safeguarding a child or adult at risk. Children and adults who have been harmed as a result of staff behaviour must be protected from further harm and provided with support. Their immediate safety as well as the safety needs of all other service users (current or historical) must be addressed. This will involve making referrals to social services as per the above 'Managing Safeguarding Concerns Procedure' above.

Strand 2: A police investigation if a criminal offence may have been committed

A report must be made to the Police and a crime reference number obtained where:

- there has been a crime, or a crime is suspected
- allegations about staff/volunteers who are no longer working for SSAP must also be reported to the Police.

Strand 3: SSAP internal inquiry including considerations about disciplinary action

Internal investigations must be taken without delay using SSAP policies and with HR advice, but they are secondary to reports being made to police or social services. Internal enquiries should be informed by these areas:

- the subject of the allegation has a right to confidentiality during the investigation and a right to having their case dealt with fairly, quickly and consistently and to be kept informed of its progress (advice may be sought from police and DOS about what information can be disclosed to them). They should have a named contact at SSAP and be signposted to external support, e.g. union or counselling services.
- decisions about suspension or allocating alternative duties during the investigation period may need to be made. Suspension should not be the default option and alternatives to suspension will always be considered. However, whilst inquiries are ongoing, the worker in question should preferably not be in contact with service users and must be safeguarded from further allegations being made against them or from the potential they interfere with inquiries. Where suspension takes place, it is viewed as a neutral act which does not imply guilt. Suspension should be considered where:
 - police are investigating allegations.
 - the allegation is so serious that if it is substantiated, it would be grounds for dismissal.
 - the subject of the allegation may put pressure on others who are witnesses.
 - the subject of the allegation may pose ongoing risk which cannot be managed satisfactorily without suspension.

Once a referral to the DOS is accepted, a professional strategy discussion will take place involving the DOS, police and any other appropriate agencies including SSAP. The strategy discussion will consider the background, risks and current safeguards, information sharing and next steps required.

A strategy meeting will be convened by the DOS when safeguarding allegations are made about a person in a position of trust. This meeting will manage the safeguarding inquiry, co-ordinating safeguarding, criminal and employment procedures, sharing information, considering risks, planning further enquiries, deciding on actions and making referrals.

Outcomes of the investigation may fall into these areas, based on the balance of probabilities:

- **Substantiated:** there is sufficient evidence to say that the allegation is substantiated and there has been harm to the service user. Where the concerns are substantiated, the Disclosure and Barring Service (DBS) and other relevant professional bodies must be contacted about the requirement for a referral to be made to them.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation and neither guilt nor innocence is implied.

- **Unfounded:** there is no evidence or proper basis which supports the allegation being made, e.g. due to a misinterpretation or being unaware of all the circumstances. The inquiry must have evidence to disprove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and say it is malicious, invented and made to deceive. Malicious allegations made by another member of staff may result in disciplinary procedure against them. Where police are involved, this may lead to charges of 'wasting police time'.
- **False:** there is sufficient evidence to disprove the allegation.

The range of options open will depend on the circumstances of the case and take into account the result of any police investigation or criminal trial, any safeguarding enquiries about the child or adult at risk as well as the organisation's duty to safeguard the charity, its staff and service users. Options include:

- reintegrating the member of staff into the job role
- changes to the job description, working patterns or location
- invoking the disciplinary process
- dismissal
- alerting other known employers of the individual concerned
- referring to the DBS
- alerting the Charity Commission as well as commissioners, insurance company or professional regulating bodies of the subject of the allegation
- consequences for staff who have made malicious allegations. (There should be no consequence for staff who make allegations in good faith even if the allegations are not substantiated).

Decisions must be implemented as soon as possible and in three working days of the decision by SSAP. The subject of the investigation must receive a letter within five working days of the conclusion of the investigation clarifying its outcome and any implications for their employment.

Strand 4: Referral to the Disclosure & Barring Service and/or referral to a professional registration body for professional misconduct

SSAP has a duty to refer to DBS any person engaged to work in regulated activity where the allegation has been substantiated or where there has been harm caused. DBS will consider whether the person should be barred from working with children or adults at risk.

Referrals to DBS will be made where we withdraw permission for a person to work in regulated activity with adults at risk, including moving them to do work that is not regulated activity. We will also refer to DBS where we would have taken this action, but the person was re-deployed, dismissed, resigned, retired or left. The DBS referral can take place at any time during the allegations process and at the earliest stage possible.

8.13 Appendix 13: Confirmation of agreement to apply SSAP safeguarding policy and procedure

TO BE COMPLETED DURING INDUCTION AND WITHIN TWO WEEKS OF NEW POLICY AND PROCEDURE BEING ISSUED ANNUALLY

Name:

Date of Appointment:

Date Policy and Procedure Discussed in Supervision:

I have read and I understand the Safeguarding Adults Policy and Procedure. I agree to adhere to its requirements during my work at SSAP.

YES/NO (circle as applicable)

I have had the opportunity to discuss the Safeguarding Adults Policy and Procedure with my line manager.

YES/NO (circle as applicable)

NAME OF WORKER:

SIGNATURE OF WORKER:

DATE:

NAME OF MANAGER:

SIGNATURE OF MANAGER:

DATE: