



## Children and Young Adult Safeguarding Policy – July 2022

**Date of Policy: 07 July 2022**

**Policy Approved By: BoT**

**Overall Responsibility for Policy:** Board of Trustees

**Person for the Responsibility for Implementation of the Policy:** Katie Eccles, Clinical Director

**Policy Applies to:** All Trustees, Staff, Contractors, Partners and Volunteers of COMPASS-Ghana

**Date of next review:** July 2023

Cross Reference to other policies:

### Section One: Aim of this Policy

1. **COMPASS-Ghana's** approach to the protection of children and vulnerable young adults is based on the principles recognised in the Children Act 1989, the United Nations Declaration on the Rights of the Child, the No Secrets Guidance (2000), and 'Working together to safeguarding children' (HM Government 2015).
2. We recognise the welfare of any person is paramount and all children and vulnerable young adults, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from all types of harm and abuse. *(As defined in Appendix 1)*

### Section Two: Commitment

3. **COMPASS-Ghana will therefore:**
  - a. Raise awareness of the need to protect children and vulnerable young adults and reduce risks to them
  - b. Work in partnership with all stakeholders and other agencies to promote and safeguard welfare
  - c. Ensure that staff in contact with children and vulnerable young adults will have the requisite knowledge, skill and qualifications to carry out their jobs safely and effectively
  - d. Ensure safe practice when working in partnership with other organisations
  - e. Maintain an organisation that is safe for staff and children and vulnerable young adults and an environment where poor practice is challenged
  - f. Make Line-managers responsible for assuring this happens
  - g. Ensure that all staff, delivery partners, associates, volunteers, young people and directors who will be working with children and vulnerable young adults' consent to and complete an enhanced Disclosure and Barring Service (**EDBS**) check
  - h. Ensure that when abuse is suspected or disclosed, that clear and appropriate action is taken as outlined in this Safeguarding Framework
  - i. Ensure that the Directors and members of the Management Team are accountable for the effective implementation of this policy and framework
  - j. Ensure that all staff receive a copy of this protection policy and safeguarding framework, are trained in their meaning and application and understand their responsibilities.



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- k. Ensure self-audit activities identify where the application of safeguarding procedures and good practice are being applied

### Section Three: Purpose of the framework

4. The Purpose and Objectives of **COMPASS-Ghana** clearly state a responsibility for children and young adults, within the context of End of Life and Palliative Care. Either at the end of their lives or as a member of the family, extended family or as a care giver of an end-of-life patient. **COMPASS-Ghana** is committed to:
  - a. To provide protection for the children and vulnerable young adults with whom **COMPASS - Ghana works** with
  - b. To ensure that all employees and others covered by this policy understand the context and relevance within which DBS checking and registration with the Independent Safeguarding Authority takes place
  - c. To provide all employees with guidance on how they should behave if they suspect that a child and or vulnerable young adult may be experiencing, or be at risk from some form of abuse
  - d. To guide employees on how to respond to and report protection concerns.

### Section Four: To whom the Framework applies

5. This policy applies to all Trustees, Staff, Contractors, Partners and Volunteers of **COMPASS-Ghana** working on behalf of COMPASS-Ghana in any capacity and in any setting.

### Section Five: Recruiting and supporting staff

6. Staff have a responsibility to ensure the safety of children and vulnerable young adults with whom they work. It is the responsibility of staff to promote good practice and minimise and manage potential risks. All staff, including contract staff and associates, must be aware of the requirements within these procedures.
7. It is the responsibility of managers to ensure that the staff they line-manage are aware of and understand the procedures and have levels of knowledge and skills commensurate to the level and nature of their direct involvement with children and vulnerable young adults.
8. Therefore:
  - a. All staff are supervised and supported in their work
  - b. Frontline staff have access to specialist supervision from a qualified, external supervisor
  - c. All staff work to **COMPASS - Ghana's** policies and procedures which are reviewed and updated as necessary
  - d. All staff receive appropriate training in child and vulnerable young adult protection at a level appropriate to their work situation

### Section Six: Code of practice for staff

9. The role of managers include:
  - ✿ Being the first point of contact for reports of concerns
  - ✿ Ensuring that all employees and volunteers in regulated roles are subject to EDBS
  - ✿ Providing advice and support to employees reporting disclosures or concerns



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10. It is important that all staff work to a high standard of professional conduct and act with integrity at all times, in order to minimise the risk of abuse from within **COMPASS-Ghana**. It is important to create a work environment where the risk of abuse is minimised.

11. Staff should make sure that they have a working knowledge of the different forms of abuse and possible indicators.

### Section Seven: Procedures for handling disclosures and allegations

12. **COMPASS-Ghana role in protection of children and vulnerable:** **COMPASS-Ghana's** staff have no powers to investigate abuse. Nonetheless **COMPASS-Ghana's** staff and volunteers have a duty to safeguard and promote the welfare of children and vulnerable young adults and a responsibility to work closely and co-operatively with other agencies in order to achieve this. Staff may have a role as referrers, witnesses or supporters of people involved in child and vulnerable young adult protection processes.

13. **Partnerships:** All overseas partners are referred to this policy and will comply within the spirit of its content, will report back quarterly to **COMPASS-Ghana**.

14. **Confidentiality and the possible impact on the person:** In any work with children and vulnerable young adults it is important to be clear about confidentiality. Personal information held by **COMPASS-Ghana** is subject to a legal duty of confidence and should not normally be disclosed without the subject's consent. However, when there are concerns that the child or vulnerable young adult is or may be at risk of significant harm, then the over-riding objective must be to safeguard that person and disclosure of information is imperative. This principle is accepted within the Data Protection Act 2018.

14. **Do not promise to keep secrets:** Should it become necessary to pass on personal information to another party, this decision should always be discussed with the subject and where possible their cooperation sought beforehand. Explanations of the reasons; the processes; the likely sequence of events; who to contact for information or for support should also be provided.

15. **Confidential record-keeping:** All concerns and any discussions about a subject's welfare should be recorded in writing whether or not further action is taken. It is important that concerns raised are recorded accurately and in detail. All discussions should end with clear and explicit recorded agreement about who will be taking what action. Where no further action is the outcome the reason for this should be clearly recorded. Records are sent to the Lead Safeguarding Officer (Clinical Director) and kept separately and securely in a secure location to which access is restricted for at least 10 years.

16. When disclosures and details are sent electronically, information should not be recorded directly into the body of an email – rather it should be on a document that is attached, and password protected.

17. Lead and Deputy Safeguarding Officers. The contact details for the lead and deputy are:

Role	Name	Title	Work No	e-mail
Lead	Katie Eccles	Clinical Director	07510 707445	Katie.eccles@compass-gh.org
Deputy	John Davies	Chief Operating Officer	07874 663434	John.davies@compass-gh.org

18. The responsibilities of the Lead and Deputy Safeguarding Officers include, but not limited to:



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- a. Developing COMPASS-Ghana's approach to Safeguarding, reviewing the policy and procedures on a regular basis
- b. Monitoring and auditing referrals/cases reported and working with the Management Team to ensure resolution, referring concerns to Social Services when appropriate
- c. Auditing the operation of the policy and procedures
- d. Arranging training for staff to ensure that the policy and procedures are implemented throughout the organisation
- e. Liaising with other agencies
- f. Retaining all records of referrals/cases for at least 10 years.

### Section Eight: What to do if someone discloses an abusive act or experience

19. If a child or vulnerable young adult confides to a member of staff that they are being, or have been, abused, the staff member should:

- ✿ React calmly and tell the person they were right to tell
- ✿ Take what is said seriously. Be clear that they cannot keep secrets and that they have to pass on information if they think the person has been or is being harmed in some way
- ✿ Only ask questions if they need to clarify what they are being told – they should not ask about explicit details
- ✿ Not ask leading questions
- ✿ Make a full written record of what is being said, heard and seen as soon as possible, including information in relation to the date, the time, the place where the alleged abuse happened, the name of the person receiving the information or who has the concern and the names of others present, the name of the complainant and, where different, the name of the child or vulnerable young adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation. If there is immediate danger, seek further advice from the Designated Safeguarding Lead with the partner organisation or charity or NGO or at COMPASS-Ghana before recording a written record, or call the police yourself immediately if warranted.
- ✿ Immediately pass the information onto the Ghana-Compass's Lead or Deputy Safeguarding Officer

20. **Process, recording and referral:** Where concerns relate to someone below their 18th birthday, any suspicion, allegation or incident of abuse must be reported to the COMPASS-Ghana's Lead or Deputy Safeguarding Officer and a written report filed. If the Lead or Deputy Safeguarding Officer is not available, they should report the matter to another member of the Management Team. If the COMPASS-Ghana key partner contact point is not available, they should report the matter to another member of the Senior Management Team at the anchor, advising the lead or Deputy Safeguarding officer as soon as possible.

21. **Responding to allegations of abuse or inappropriate or dangerous behaviour by a member of staff:** Regardless of the age of the person in question, if an allegation of abuse or inappropriate conduct is made against a member of staff, or person in a position of trust, then this must be reported to the Lead Safeguarding Officer immediately.



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### Section Nine: Child and vulnerable adult protection and safeguarding arrangements when working with another organisation

22. It is important that all staff and associates recognise the importance of working co-operatively with other agencies in managing situations where children and vulnerable young adults may be at risk.
23. When COMPASS-Ghana is working in partnership with another organisation, in whatever capacity, it must be determined beforehand which organisation and member of staff will be responsible for leading on child and vulnerable young adult protection issues. Once that has been determined, the process described above in 'What to do if someone discloses an abusive act or experience' should be followed, with the COMPASS-Ghana's key contact at the anchor being informed immediately so as to follow the anchor's Safeguarding policy as well as this framework.
24. **Ensuring partner organisations have arrangements in place:** When COMPASS-Ghana works with another organisation, we will ensure that the partner organisation has appropriate safeguarding policies in place, which will include child and vulnerable young adult protection policies and procedures, sound recruitment and selection practices and formal complaints procedures for users.
25. Procedures for addressing child and vulnerable young adult protection and any other poor practice concerns are detailed in contracts and service level agreements. COMPASS-Ghana will have a standard statement to this effect in all contracts.
26. If a member of staff becomes aware of allegations of abuse relating to a partner organisation, this should be discussed in the first instance with the Lead or Deputy Safeguarding Officer.

### Section Ten: Media and publications

27. Permission from children and vulnerable young adults must be given before anything is published concerning them. Similar permission should be sought if Photographs or Video is taken of them.

### Section Eleven: Policy review

28. COMPASS-Ghana undertakes to review this safeguarding policy and related policies and procedures annually and update them on the basis of developing practice, learning and experience and when there are changes in relevant Government legislation and guidance.

### Section Twelve: Other significant aspects of Safeguarding

29. **PREVENT:** The current threat from Terrorism and Extremism in the United Kingdom is real and severe and can involve the exploitation of vulnerable people, including children and young people.

- ✿ **Radicalisation** is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.
- ✿ **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We
- ✿ also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).



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30. **PREVENT** is a key part of the Government’s strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation.

31. All staff should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately. Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the young person supports terrorism and/or extremism, must be reported to the named designated safeguarding professional immediately and no later than the end of the working day.

32. **Violence Against Women and Girls (VAWG):** The term “Violence Against Women and Girls (VAWG)” defines the range of serious violent crime types which are predominantly, but not exclusively, experienced by women and girls which include:

- ✿ domestic violence and abuse (including coercive control)
- ✿ sexual violence including rape
- ✿ sexual exploitation
- ✿ sexual harassment
- ✿ stalking ‘honour’-based violence (HBV)
- ✿ forced marriage
- ✿ faith-based abuse
- ✿ female genital mutilation (FGM) or cutting
- ✿ prostitution and human trafficking

33. **COMPASS-Ghana** recognises the significance of this strategy and ensures that staff are aware of and will understand its principles.

### Section Thirteen: Contextual Safeguarding

34. Safeguarding incidents and/or behaviours can be associated with factors outside the school or anchor organisation and/or can occur between children. All delivery staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare.

End July 2022



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### APPENDIX 1

### DEFINITIONS AND CONCEPTS IN CHILD AND VULNERABLE ADULT PROTECTION

#### CHILDREN

1. As per Children Act 1989 and Children Act 2004, a child is anyone who has not yet reached his or her 18th birthday.

#### VULNERABLE ADULT

2. An adult at risk could be a person who is 18 years or older and who has a dependency on others, or a requirement for assistance from others, in the performance of basic physical functions or is in need of community care services by reason of mental or other disability, age or illness; has a severe impairment in their ability to communicate with others or has an impairment in their ability to protect themselves from assault, abuse, neglect, harm or exploitation. This may include a person who:

-  is a substance misuser
-  is homeless
-  is isolated with minimal interaction with friends and family

#### SIGNIFICANT HARM

3. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes a single traumatic event may cause significant harm e.g. violent assault, suffocation, poisoning. More often however, it is the cumulative effect of incidents and/or behaviours which over time significantly impair the child's or young adult's physical and psychological development.

#### TYPES OF ABUSE

##### Abuse

4. A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

##### Physical abuse

5. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child.

##### Emotional abuse

6. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:



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- ✿ Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- ✿ Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- ✿ Seeing or hearing the ill-treatment of another e.g. where there is domestic violence and abuse;
- ✿ Serious bullying, causing children frequently to feel frightened or in danger;
- ✿ Exploiting and corrupting children.

7. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### **Sexual abuse**

8. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

9. Sexual abuse includes non-contact activities, such as involving children in looking at, including online and with mobile phones, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

10. In addition; Sexual abuse includes abuse of children through sexual exploitation. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under s5 Sexual Offences Act 2003. See Part B1, Practice Guidance.

### **Peer on Peer Abuse**

11. Peer-on-peer abuse includes bullying, physical abuse, sexual violence and sexual harassment, sexting, and so-called initiation ceremonies. This abuse should always be treated seriously, and never just as banter or part of growing up.

### **Neglect**

12. Neglect is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development.

13. Neglect may occur during pregnancy as a result of maternal substance misuse, maternal mental ill health or learning difficulties or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected.





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14. Once a child is born, neglect may involve a parent failing to:
- ✿ Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
  - ✿ Protect a child from physical and emotional harm or danger;
  - ✿ Ensure adequate supervision (including the use of inadequate caregivers);
  - ✿ Ensure access to appropriate medical care or treatment.
15. It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs.
16. Included in the four categories of child abuse and neglect above, are a number of factors relating to the behaviour of the parents and carers which have significant impact on children such as domestic violence. Research analysing Serious Case Reviews has demonstrated a significant prevalence of domestic abuse in the history of families with children who are subject of Child Protection Plans. Children can be affected by seeing, hearing and living with domestic violence and abuse as well as being caught up in any incidents directly, whether to protect someone or as a target. It should also be noted that the age group of 16 and 17-year-olds have been found in recent studies to be increasingly affected by domestic violence in their peer relationships.
17. The Home Office definition of Domestic violence and abuse was updated in March 2013 as: "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence and abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender and sexuality.
18. This can encompass, but is not limited to, the following types of abuse:
- ✿ Psychological;
  - ✿ Physical;
  - ✿ Sexual;
  - ✿ Financial;
  - ✿ Emotional.

### **Controlling Behaviour**

19. Controlling behaviour is defined as a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

### **Coercive Behaviour:**

20. Coercive Behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

*All definitions of abuse above taken from London Child Protection Procedures  
([http://www.londoncp.co.uk/chapters/responding\\_concerns.html#def](http://www.londoncp.co.uk/chapters/responding_concerns.html#def))*

End