

## REPORT OF DISCOVERY TEAM

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### **SUBJECT: PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY SAFEGUARDING STATEMENT**

#### Purpose of Report

To introduce the revised National Park Authority Safeguarding Statement for consideration and approval by members.

#### Introduction/Background

Pembrokeshire Coast National Park Authority's Safeguarding Statement and guidance has been revised to take account of changes to legislation (Social Services and Well-being (Wales) Act 2014) and in the way these changes have been interpreted and delivered at a local level in West Wales. The new policy includes additional guidance and provides updates regarding processes and procedures.

#### Comparisons

Pembrokeshire County Council, the lead agency in managing safeguarding locally, has provided support in updating the National Park Authority's statement and guidance.

#### Financial considerations

Current cost to the Authority is largely limited to the staff time required to oversee the delivery of its safeguarding work (as outlined in the statement), this includes an internal working group which has oversight of our work in this area and the management of the DBS checking process which is overseen by the HR team.

#### Risk considerations

There are significant risks attached to not having a robust statement and policy which is delivered and adhered to by the Authority's workforce. The revised policy presented here is designed mitigate against any potential risks.

#### Compliance

Both the Social Services and Well-being Act (2014) and Childrens Act (2004) impose a clear duty on public bodies to ensure that the safeguarding of children and vulnerable adults is a consideration in the planning and delivery of all its activity.

#### Human Rights/Equality issues

The statement and guidance contribute to the wider themes of equality and the Authority's work in this area.

#### Welsh Language statement

The statement and guidance will be presented bilingually.

Recommendation

Approve the Safeguarding Statement for Pembrokeshire Coast National Park Authority.

*Author: Graham Peake (Discovery Team Leader)*



# SAFEGUARDING STATEMENT

## Policy Statement

### Who does this policy apply to?

This policy applies to Pembrokeshire Coast National Park Authority Members, staff and volunteers, but especially to those employees whose duties and roles bring them into regular contact with children, young people and vulnerable adults.

The Authority provides a range of activities and events for a wide range of audiences which include children<sup>1</sup>, young people and vulnerable adults<sup>2</sup>. The Authority employs staff, and works with volunteers, whose jobs involve work with these groups.

Children, young people and vulnerable adults are particularly defenceless to abuse or mistreatment. Abusers are often in positions of trust or power (most often, the abuser is known to the child, rather than a stranger). Vulnerable people do not expect adults to harm them and they can often be easily persuaded that there is nothing wrong and that they should not tell. Abuse can be physical, emotional/psychological, sexual, financial or neglect.<sup>3</sup>

**This policy aims to ensure that sound working practices are in place that put safeguarding as a priority and which are effective in managing risk for these vulnerable groups, but which will also protect staff and volunteers against wrongful or malicious allegations. To achieve this the Authority will:**

- Ensure that Members, staff and volunteers have an awareness of the issues which may lead to children, young people and vulnerable adults being harmed.
- Ensure careful recruitment, selection and management procedures. These procedures will include regular support to, and supervision of, staff and volunteers.
- Keep safeguarding policies under regular review.
- Have safeguarding guidelines, and communicate them to staff, volunteers and Members in appropriate ways.
- Ensure that all staff and volunteers are following good and safe working practices.
- Have procedures in place relating specifically to transport, work placements, use of photography, residential visits and E-safety.
- Be involved in training made available through various agencies and strengthen links with these agencies.
- Foster a culture of openness, which encourages individuals to share concerns or suspicions.
- Ensure that there is an effective process for managing complaints, grievances and disciplinary procedures.

***Signed by the Chair of the Authority .....***

# **Pembrokeshire Coast National Park Authority Safeguarding Policy: Supporting Materials**

## **Contents**

- 1. Introduction**
- 2. Your responsibilities**
- 3. About abuse**
- 4. Employment processes**
- 5. Working safely**
- 6. Volunteers**
- 7. Work experience and placements**
- 8. If you suspect abuse or mistreatment**
- 9. If you have concerns about colleagues**
- 10. Making and dealing with allegations**

***The Discovery Team Leader, Graham Peake, is the Safeguarding Lead for the Authority and is the first point of contact in relation to incidents and issues. In his absence, contact either the Ranger Service Manager, Libby Taylor, or the Chief Executive, Tegryn Jones.***

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## 1. Introduction

The Authority (PCNPA) works with a wide range of audiences which include children<sup>4</sup>, young people and vulnerable adults<sup>5</sup>. The Authority employs staff and works with volunteers whose roles involve work with these groups.

This policy aims to ensure that sound working practices are in place that put safeguarding as a priority and which are effective in managing risk for these vulnerable groups, but which will also protect staff and volunteers against wrongful or malicious allegations.

The Authority wants children, young people and vulnerable adults to enjoy their involvement with us, and to inform and enthuse them about the National Park and what we do. Their lives can be enriched by participating in a variety of activities: they learn and have a good time. The Authority will take all reasonable steps to ensure that they do this safely. They have the right to be protected from harm.

This policy sets out how the Authority will recruit staff and volunteers, how it will ensure that those persons have the appropriate checks, and how it will train staff and volunteers in relation to safeguarding. It will set out how the Authority will monitor and support staff and volunteers.

This document gives guidance for staff who may suspect that a child or vulnerable adult they have contact with is being abused or mistreated. It outlines what will happen if there is an allegation involving Members, staff or volunteers.

This policy applies across the Authority, although in practice, it has most relevance to ranger teams and centre-based staff together with volunteers involved in supporting this work.

## 2. Your Responsibilities

All individuals in contact with or working with children, young people, vulnerable adults and their families; or with adults who may pose a risk to children; or responsible for arranging services for children and/or adults, should: <sup>6</sup>

- Understand their role and responsibilities to safeguard and promote the welfare of children, young people and vulnerable adults;
- Know and follow their organisation's procedures and protocols for safeguarding and promoting the welfare of children, young people and vulnerable adults and know who to contact in their organisation to express concerns about an individual's welfare;
- Be alert to indicators of abuse and neglect;
- Have received child protection training to a level commensurate with their role and responsibilities;
- Know when and how to refer any concerns about a child, young person or vulnerable adult.

As part of the Authority's procedures for safeguarding and promoting the welfare of children, young people and vulnerable adults it may be necessary to carry out a check on an individual. These checks are part of the Disclosure and Barring Service.

A Disclosure and Barring Service check provides information about an individual's criminal record. It can only be undertaken with the agreement of the individual, and the certificate issued is sent only to the individual and not the Authority.

There are clear guidelines about what roles are eligible for a check, and in most cases no check will be required.

**A check can only be made for the purposes of safeguarding children, young people or vulnerable adults.**

### **3. About abuse**

A child or vulnerable adult is abused or neglected when somebody inflicts harm, or fails to act to prevent harm. Victims may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. The type of abuse is generally classified under the following five headings: <sup>7</sup>

#### **Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or vulnerable adult. Physical harm may also be caused when a parent or caregiver fabricates or induces illness in a child/vulnerable person whom they are looking after.

#### **Emotional/psychological abuse**

Emotional/ psychological abuse is the persistent emotional ill treatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to a child or vulnerable adult that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on an individual. It may involve causing victims frequently to feel frightened or in danger, for example by witnessing domestic abuse within the home or being bullied, or, the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child or vulnerable adult, though it may occur alone.

#### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the victim is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

#### **Financial abuse**

Financial or material abuse is any theft or misuse of a person's money, property or resources by a person in a position of, or expectation of, trust to a vulnerable person or child.

#### **Neglect**

Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of the child or vulnerable adult's health or development. It may involve a parent or caregiver failing to provide adequate food, shelter and clothing, failing to protect from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, an individual's basic emotional needs.

In addition, neglect may occur during pregnancy as a result of maternal substance misuse.

## 4. Employment Processes

### 4.1. Recruitment and Selection:

Careful recruitment and selection of staff reduces the opportunity for people who present a risk of harm to children, young people or vulnerable adults from using a post with the Authority to access children.

**Careful recruitment will include all applicants, including volunteers;**

- 1. Completing an application form**
- 2. Providing two references**
- 3. Having an interview**
- 4. Having a DBS check where eligible**

An application form must be completed by anyone applying for employment within the Authority. It may also apply to volunteers where the role applied for involves working with children, young people and vulnerable adults. See the Authority's Volunteering Handbook for more information. The application form must include a full employment history.

Two referees must be supplied as part of the application process. Where the post holder may be in regular contact with children, young people or vulnerable adults the Authority will try to ensure that at least one of these referees can provide information about the applicants experiences working or volunteering with children, young people and/or vulnerable adults

At the interview, at least one member of the selection panel will have specialist understanding of effective recruitment within this safeguarding policy.

A Disclosure and Barring Check will take place if the role applied for fulfils the criteria for such checks as shown below. This includes, where appropriate, a check for criminal records, in line with the Disclosure and Barring Service (DBS) processes and code of practice.<sup>8</sup>

Posts identified as requiring 'disclosure' include ranger teams, both Discovery Rangers and Delivery Rangers, and other staff whose role involves regular unsupervised activity with children, young people and/or vulnerable adults. This includes staff involved in projects, and those at National Park centres, who carry out similar duties, and volunteers carrying out similar duties. Until all relevant checks have been completed satisfactorily, individuals will not work in an unsupervised capacity and it is the manager's responsibility to monitor this.<sup>9</sup>

**However, a police check will not necessarily reveal an offender, as not all people who abuse children are known to the police. Therefore the recruitment and selection procedures must be followed and must be robust.**

The Authority is committed to equality of opportunity and therefore having a criminal record will not necessarily bar someone from working with us. An objective assessment of risk will be undertaken by the relevant Team Leader, the Safeguarding Lead and the HR Manager (refer to the Authority's policy statement on the recruitment of ex-offenders for more detail).

**Pembrokeshire Coast National Park Authority – roles of staff/volunteers in relation to safeguarding**



## **Role 1 - Discovery/Area Rangers/education leaders**

*As part of their work Rangers/leaders deliver a programme of activities and events with a view to engaging with a range of audiences:*

### Education programme:

Focus on working with primary & secondary school children and teachers, delivering half-day and full-day sessions in the National Park, undertaking a range of 'hands-on' practical activity. Rangers plan and lead sessions for whole classes and sometimes have responsibility for smaller groups as and when an activity demands (these could sometimes be undertaken out of visual contact with teachers). Various locations, including NP run centres. Groups include Reception and KS1 through to 16+, including children and young people with a range of special needs. They may work with 3-4 schools a week and may work with the same group on more than one occasion.

Eligible for enhanced DBS check only

### Social Inclusion programme:

Often working with vulnerable adults and young people on a range of practical/hands on activity. May take responsibility for small groups on specific activities. Can work with the same group on several occasions. On occasions rangers work with groups who are outside their normal 'care setting' e.g. on residential visits with youth clubs.

Regulated activity, enhanced DBS and barring lists checks

### Activities and Events:

Delivering activities and events for families and other groups. Parents usually present, but group can spread out over a large area, on a beach for example. Some activities involve leading groups of vulnerable adults on (for example) a guided walk, these groups can be accompanied or unaccompanied

Not eligible for check

### Youth Rangers/Duke of Edinburgh

Running sessions (usually practical work) for groups of young people (16+) on a regular basis – often the same individuals. No parents/guardians present

If frequency criteria met, regulated activity, enhanced DBS check and barring list check

### Placements

Takes responsibility for individual placements at a specific location or series of locations.

Placements agreed with school and can be under 16. A range of activity carried out over a single week/two weeks.

If intensity criteria met, regulated activity, enhanced DBS check and barring list check

## **Role 2 - Centre based education leaders**

### Education programme:

Centre based staff work with primary and secondary school children and teachers, delivering half-day and full-day sessions at their own centre, undertaking a range of 'hands-on' practical activity.

Leaders deliver sessions for whole classes and sometimes have responsibility for smaller groups as and when an activity demands (these could sometimes be undertaken out of visual contact with teachers). Groups include Reception and KS1 through to 16+, including children and young people with a range of special needs. They may work with 3-4 schools a week and may work with the same group on more than one occasion.

Eligible for enhanced DBS check only

### Social Inclusion programme:

Occasionally working with vulnerable adults and young people on a range of practical/hands on activity. May take responsibility for small groups on specific activities.

Eligible for enhanced DBS check only, if not meeting frequency criteria

Activities and Events:

Delivering activities and events for families and other groups. Parents usually present, but group can spread out over a large area.

Not eligible for check

Placements

Takes responsibility for individual placements at a specific location. Placements agreed with school and can be under 16. A range of activity carried out over a single week/two weeks.

If intensity criteria met, regulated activity, enhanced DBS check and barring list check

**Role 3 - National Park staff responsible for placement students:**

Takes responsibility for individual placements at a specific location. Placements agreed with school and can be under 16. A range of activity carried out over a single week/two weeks.

If intensity criteria met, regulated activity, enhanced DBS check and barring list check

**Role 4 – Volunteer Walk Leader**

Leading guided walks at various locations across the National Park for various groups. Groups are adults, but can include some vulnerable adults (with carers).

Not eligible for check

## 4.2. Renewing Checks<sup>10</sup>

There is no legal requirement for the Authority to carry out periodic Disclosure Barring Checks (DBS). Where checks take place, they do so with the permission of the individual and the certificate issued is sent to the individual, and not to the Authority. The Authority requires that appropriate staff and volunteers register with the Update Service; an instant online method that checks an individual's status. The service is updated weekly to show any changes to an individual's criminal convictions and barring service. The costs of joining the service will be met by the Authority. Checks for volunteers are free.

The Authority can ask staff and volunteers permission to apply for a new check whenever they think one might be necessary.

The decision to apply for a new check should be made by the Safeguarding Lead and Team Leader responsible for an individual staff member or volunteer, in consultation with the HR Manager. The decision to check should be made if an individual's role or circumstances are believed to have changed and should be proportionate to risks.

Status Checks will confirm that the current certificate held by a member of staff or volunteer;

- Did not reveal any information and remains current
- Remains the same. No new information has been identified and the certificate remains current
- Is no longer current. Information has changed and a new certificate should be applied for that is up to date

Where a new certificate is needed the Authority must seek the permission of the individual before an application to the DBS is made.

New certificates will only be sent to the staff member or volunteer. The Authority requires the individual to present the new certificate to the HR Manager within the required timeframe. However, a new certificate may be obtained from the DBS if the individual refuses to show their certificate, and if all criteria are met.

### **4.3. Induction, Training and Support**

#### **Induction:**

Team Leaders will ensure that formal induction processes are followed for new staff and volunteers, to include guidance relating to children, young people and vulnerable adults. Seasonal staff must be re-briefed at the start of each season.<sup>11</sup> If further training needs are identified, these should be followed up.

#### **Training:**

All staff that work with, or who manage staff who work with, vulnerable groups will undergo the Pembrokeshire Local Operational Group (LOG) Safeguarding Board Tier 1 Training.<sup>12</sup> Team leaders should keep records of which staff have undertaken training, and when, and report this to the HR Manager.

The Safeguarding Lead and the Ranger Service Manager will undergo appropriate child protection/adult protection Tier 2 Training.

General briefings for all the Authority's managers, including Committee Members will be held as necessary.

All Members and relevant staff must be made aware of this policy and guidance and of procedures for dealing with safeguarding incidents.

#### **Support and Monitoring:**

Team Leaders should provide ongoing support to staff and volunteers; safeguarding should be kept as a visible, priority issue and included in staff appraisals and other 1 to 1 meetings, team meetings etc

Staff and volunteers working directly with children, young people and vulnerable adults are part of a regular monitoring programme where staff are 'assessed' in the field, measuring various elements of the work, including safeguarding measures and health and safety

## 5. Working Safely

The Authority implements safeguarding across all activities by

- Ensuring that all activities involving children, young people and vulnerable adults are subject to the appropriate risk assessment which aims to manage risk of all kinds. Risk assessment will be in line with current Authority guidance and health and safety policy and will be carried out by people with a good understanding of safeguarding issues appropriate to the activity and/or setting. This should ensure that staff and volunteers feel confident in their work and to have an opportunity to share any concerns about child protection or adults at risk.
- Providing adequate training and supervision in order to manage the risk to children, young people and vulnerable adults.
- Ensuring that Team Leaders have a good understanding of safeguarding issues and ensure that job procedures within their services take account of this policy and include processes for dealing with relevant incidents

Many staff will not, in their day to day roles, work with children, young people and vulnerable adults. Even so, there may be occasions where their duties do bring them into contact with these groups, albeit briefly, such as working with work experience placements or through support services.

**The following sections on transport, photography, data management and E-Safety therefore apply to all staff and volunteers working for the Authority.**

## 5.1 Guidance on First Aid

Generally, first aid treatment should be carried out by the staff from the organisation with which the Authority is working, eg, a class teacher. However, there are occasions when an Authority staff member or volunteer may be called upon to assist with or to give first aid treatment. This may be because the Authority's staff or volunteers are directly responsible for the group, the organisation's staff need to manage the rest of the group or because of the severity of the injury more than one first aider needs to be involved. When giving first aid treatment it is advised that staff and volunteers remember the following guidance.

- Try not to give first aid alone. Where possible have another member of staff with you.
- Consider where treatment is taking place. Think about your safety, but also about the patient. They may be embarrassed or distressed by what has happened.
- Consider where the injury is that you need to treat. Explain to the patient exactly what you are going to do, and make sure that they understand and agree.
- If an injury requires treatment where possible ask the patient to administer their own treatment, under your guidance. This will depend on the age and understanding of the patient, and also on the severity of the injury and potential distress of the patient.
- A record should be made via the Authority's incident reporting process as soon as possible after the event, but not later than 24 hours, recording the details of the incident, any resulting injuries, and any treatment given or advised. It should also be noted if treatment is declined.

## 5.2 Guidance on transporting children, young people and vulnerable adults <sup>13</sup>

While in most instances there will be no need for Authority staff to transport children, young people and vulnerable adults in their own or Authority vehicles, there are occasions when such a need occurs. When that happens, the following guidance should be followed.

- Journeys should be agreed between the Authority staff member and their line manager, and should be with the consent of the organisation, school or parent/guardian of the person being transported.
- The reason for the journey, and length of journey should be clear.
- It is the responsibility of the driver to have the correct documentation (current MOT certificate, insurance, driving licence) to prove that the vehicle is roadworthy.
- Vehicles must have the correct restraints, appropriate to the age and size of the student.
- The child, young person or vulnerable adult must not be left unattended in the vehicle.
- Ideally journeys should not be made without an additional adult in the vehicle. This significantly reduces the risk of distraction, accident and injury and allegation of misconduct or abuse. If this is not practically possible the risks must be assessed and measures put in place to ensure that the risks are reduced to the lowest level.

### **5.3. Guidance on the taking of photographs and moving images for work purposes <sup>14</sup>**

Photographs of children, young people and vulnerable adults help staff to demonstrate the breadth of their work, and are used for publicity purposes when promoting the work of the Authority.

- Photographs should only be taken with the consent of the organisation, school or parent/guardian, and the purpose for which the pictures have been taken is understood. A consent form for taking photographs is available from the Authority.
- Photographs should only be taken to demonstrate work in which the children, young people and vulnerable adults are involved or have completed. They should focus on the activity, and not on individuals. Care should be taken that all participants are appropriately dressed.
- Care should be taken when supplying information with photographs. Do not supply full names or other personal information.
- Do not use images of children or young people who are considered vulnerable, or whose identity may require protection.
- Images should be carefully stored, with consent attached or cross referenced.
- Images should only be passed to third parties for their use where this has been agreed as part of the consent process.

The Child Trafficking and Pornography Acts 1998/2004 contain specific provisions on the exploitation of children. Photographs or recorded visual material where children and young adults are identifiable are regarded as personal data under the Data Protection Act 2018 and their creation, storage and use must comply with the requirements of this Act. Please see Section 5.4 - Data Management and Protection.



## 5.4 Data Management and Safeguarding

The Authority's staff and volunteers need to ensure when handling sensitive personal data that they comply with the Data Protection Act 2018<sup>15</sup>. Personal data is defined as data relating to a living individual who can be identified from the data or from the data in conjunction with other information in the possession of the data controller. It must be obtained fairly, accurately, kept up to date and should be kept and used only for one or more specified lawful purpose. The Authority must have a valid lawful basis in order to process personal data.

### Children, vulnerable adults and data protection

Under the Data Protection Act children and adults at risk are identified as "*vulnerable individuals*" and deserving of "*specific protection*". Where the personal details of children and adults at risk are collected the nature of the records should be included on the Authority's data register with the relevant legal basis for processing listed.

Privacy notices for children and vulnerable adults should be in place so that they are able to understand what will happen to their personal data, and what rights they have. Privacy notices should be clear, and written in plain, age-appropriate language.

Children and adults at risk have the same rights as others over their personal data. These include the rights to access their personal data; to request rectification; object to processing and to ask that their personal data is erased.

### Sharing Information and Safeguarding

Whenever possible, consent should be obtained before sharing personal information with third parties. However, in some circumstances, consent may not be possible or appropriate as the safety and welfare of a child or vulnerable person may dictate that the information must be shared.

**One of the exceptional circumstances is in order to prevent abuse or serious harm to others. The most important consideration is whether sharing information is likely to safeguard and protect a child or vulnerable adult.**

You should seek advice from the National Park Authority's Safeguarding Lead (details can be found at the end of this policy document) before sharing information in the circumstances indicated above.

## 5.5 E-Safety <sup>16</sup>

E-Safety encompasses not only Internet technologies but also electronic communications via mobile phones, games consoles, wireless technology and all forms of on-line social media. It highlights the need to educate children and young people about the benefits, risks and responsibilities of using information technology. E-Safety concerns safeguarding children and young people in the digital world, and supporting them to develop safer online behaviours both in and out of school. Authority staff should.

- Work within the boundaries of professional behaviour.
- Should not use NPA equipment for inappropriate reasons, and be guided by the Authority's ICT and associated policy.
- Be aware of safety concerns when preparing, and include this in the risk assessment process.
- Where appropriate, communicate with organisations, schools and parents about the purpose of e-communications.
- Should avoid exposing children and young adults to inappropriate and harmful material, or harmful interaction with other users.

### **Remember**

Emails, tweets, Facebook messages and texts. The Communications Act of 2003 (section 127) describes what constitutes an offence. But it is worth being aware that an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

Researchers have found that pupils with special educational needs are 16 per cent more likely to be victims of online abuse.

**5.6 Good practice cards are issued to staff working with children, young people and vulnerable adults as prompts. See below:**

**Safeguarding Checklist – keeping you safe**

- Ensure that you are familiar with the Risk Assessment appropriate to the activity.
- Avoid physical contact with participants - it can be misinterpreted. It is the responsibility of a group's or organisation's staff to intervene and manage behaviour amongst a participating group.
- Avoid one-to-one situations, particularly in an enclosed or isolated space. Should this happen inadvertently, send the child, young person or vulnerable adult to join the main group.
- Respect the wishes of a child, young person or vulnerable adult.
- Do not take inappropriate photographs of participants.
- Communicate with children, young people and vulnerable adults in a way that is appropriate to their age and understanding.
- Recognise that children/young people see adults as role models and that your standard of behaviour is important at all times.
- Ensure that other adults attending a group, such as volunteers and parents, recognise the need for appropriate behaviour at all times.
- Don't make suggestive (sexual or lewd) remarks in the presence of children, young people, vulnerable adults or any other National Park users.
- If you suspect that a young person is becoming inappropriately attracted/attached to you, ensure that you raise your concerns with your manager.
- If you feel that you are at risk of behaving unprofessionally (for instance because you are under stress or have inappropriate feelings towards a child, young person or vulnerable adult) you should discuss this with your manager or the HR Manager

**Remember**

**Know of and follow all procedures and instructions; do not rely on 'your good name' to protect you.**

## 5.7 Residential Placements <sup>17</sup>

There are a number of occasions where Authority staff are involved in residential or overnight stays with children, young people and vulnerable adults. Staff have a 'duty of care' to ensure all visits are conducted in a suitably supervised and safe environment for participants and so far as is "reasonably practicable" to minimise any risk which the activity may entail.

Staff should approach these activities in the same way that they would activities which take place over a shorter period. They should

- Prepare a risk assessment relating to all aspects of the stay and keep this on file. This should include reference to instances that are unique to residential visit. For example, if the participant is camping, what should they do if they need the toilet during the night. It is not enough to assume that participants will know. For many, this may be their first experience of being away from home and family.
- Inform the organisation, school or parent/guardian responsible for the child, young person or vulnerable adult exactly what the residential involves; what they will do, where they will stay, what they will need etc.
- Ensure that the trip has appropriate ratios of staff to participants. Remember, ratios change depending on the age and ability of the participants, but also depending on where they are going and what they will be doing.
- Residential visits may include the following activities, which have been categorised as high risk: camping, transport by minibus, mountain walking, swimming outdoors and other water based activities, cycling.

## 5.8 Guidance on safe and effective intervention

**The use of force should only be a last resort.** The focus of any session should be on creating a calm, orderly and supportive climate where children, young people and vulnerable adults can discover the National Park safely and in a way that enables them to grow and mature.

Very rarely an incident will occur that requires the need for force of any kind. Before intervening in any situation remember;

- The Authority asks schools and organisations bringing children, young people or vulnerable adults out to experience the National Park to agree terms and conditions. These state that organisational staff have responsibility for the behaviour and management of those in their care. Legally, only individuals to whom the senior member of staff eg, a head teacher, has designated responsibility can intervene.
- It is better to distract than to intervene.
- If intervention becomes necessary staff need to be aware of sensitivities associated with any form of physical contact.

Authority staff should, where possible, allow those professionals accompanying children, young people and vulnerable adults to manage their groups. These people know those in their care better than Authority staff. Intervention should only take place to prevent someone from:

- Committing an offence
- Causing personal injury to, or damage to the property of, any person, including themselves.
- Prejudicing the maintenance of good order and discipline among any pupils receiving education.<sup>18</sup>

## **6. Volunteers**

The Authority will treat volunteers in the same way that it treats employees in regard to safeguarding.

Volunteers whose role will bring them into regular contact with children, young people and vulnerable adults will follow similar checks to those put in place for recruiting staff. This will include an interview, the seeking of referees and such checks as are appropriate to their role.

However, most volunteers currently do not work alone with children, young people or vulnerable adults and so DBS checks are inappropriate. Even so, good recruitment practice suggests that these volunteers should be assessed/recruited with their suitability for working with these groups in mind.

## **7. Work experience/placements involving children, young people and/or vulnerable adults**

Work experience placements differ from other types of contact as they tend to involve single students working with a range of Authority staff over a period of time.

In line with good practice the Authority recognises that the duty of care for work placement students lies with the school, college or body that arranged the placement. As such it is their responsibility to ensure that all necessary risk assessments and checks have taken place.

However, as part of good practice the Authority will

- Ensure that a risk assessment is in place for all work experience placements.
- Minimise as far as possible the time spent by the student working one to one with staff, in isolated environments or travelling in Authority vehicles.
- Seek, where appropriate from the school or parent/guardian, information relating to vulnerable students that may impact on Authority employees or volunteers.

No employee should agree a work placement without informing the HR Manager. This should form part of the risk assessment process.<sup>19</sup>

## **8. If you suspect abuse or mistreatment.....**

If you do have concerns about the well-being of a child, young person or vulnerable adult, you should

- Show that you have heard what the child, young person or vulnerable adult is saying, and that you take their allegations seriously;
- Encourage the individual to talk, but do not prompt or ask leading questions; Don't interrupt when the individual is recalling significant events. Don't make them repeat their account;
- Explain what actions you must take, in a way that is appropriate to the age and understanding of the child, young person or vulnerable adult;
- Do not promise to keep what you have been told secret or confidential, as you have a responsibility to disclose information to those who need to know. Reporting concerns is not a betrayal of trust;
- Write down as soon as you can and no later than 24 hours after what you have been told, using the exact words if possible. Include details of the date, time, place and any other people who were present;
- Report your concerns to your Line Manager or Safeguarding Lead as soon as possible, and not more than 24 hours after. Where appropriate you may wish to inform a member of staff from the school or organisation of what has been said.
- Do not confront the alleged abuser;
- Do not worry that you may be mistaken. You will always be taken seriously by safe guarding agencies. It is better to have discussed it with somebody with the experience and responsibility to make an assessment

**In all cases, you should keep a written record of what was said and done.**



## **9. What to do if you are concerned about a member of staff**

It is often difficult to accept that a colleague may have harmed a child, young person or vulnerable adult. Often suspicion may take the form of concerns rather than known facts. It is important that if the behaviour of an adult or colleague gives you cause for concern, **either in the work place or in their private life**, that you:

- **Do not dismiss or ignore your concerns**
- **Do not confront the person about whom you have concerns**
- **Raise your concern with your Line Manager or the Safeguarding Lead.**

Concerns may not trigger an investigation, but they help to build up a picture, along with concerns from other sources, of a person. Remember that The All Wales Child Protection Procedures 2008 ensure that the adult is protected as well as the child.

When you raise a concern you will be asked

- The nature of those concerns
- How and why those concerns have arisen
- Any relevant details relating to those concerns
- Any information affecting the safety of children, young people, and vulnerable adults, or other members of staff

Just as when making a referral on behalf of a child, young person or vulnerable adult, the referral process cannot maintain the anonymity of the person making the referral.

## **10. Making and Dealing With Allegations of Abuse Against Staff and Volunteers<sup>20</sup>**

It is essential that any allegation of abuse made against a member of staff or volunteer is dealt with fairly, quickly and consistently, in a way that provides effective protection for the child, young person or vulnerable adult, and at the same time supports the person who is subject of the allegation.

An allegation may relate to a person who has:

- Behaved in a way that has harmed a child, young person or vulnerable adult.
- Possibly committed a criminal offence against or related to a child, young person or vulnerable adult.
- Behaved towards a child, young person or vulnerable adult in a way that indicates that they are unsuitable to work with children.

### **What will happen if an allegation is made?**

Any allegation involving PCNPA staff or volunteers must be passed immediately to the appropriate Line Manager and then the Authority Safeguarding Lead.

The Line Manager must ensure that they have all appropriate details relating to the allegation. Details might include:

- When and where the alleged incident took place
- The details of those involved
- The nature of the allegation
- How the allegation was followed up and resolved (This part of the record may be added at a later date, and not when collecting initial details)

### **What is the process for dealing with an allegation?**

Allegations may be dealt with in two ways

- Internally.(Only for allegations that present no clear evidence of abuse)
- Through referral to the multi-agency Local Operational Group (LOG)

If the allegation is referred the process can be summarised in 5 key points

1. Initial discussion between PCNPA lead and local assessment team.
2. Telling the staff member(s) concerned
3. Managing staff/considering suspension if appropriate
4. Strategy discussion
5. Investigation and Outcome

If the matter is serious it will become the subject of a Child/Adult Practice Review. At this point the employee will be suspended on pay pending the conclusion of the investigation. An employee will be suspended if there is a risk of further misconduct and the Authority needs to safeguard children, or where the employee's presence at work compromises the investigation.

**Suspension is not an indication that the Authority has concluded that the employee is guilty.**

An employee will not be suspended if the allegation is not serious or where the employee can carry out a large part of their work whilst ensuring no further contact with children, young people or vulnerable adults.

The Authority will carry out its own investigation as part of a Disciplinary Procedure, whilst ensuring that it does not jeopardise any Practice Review. **The Authority is entitled to treat the matter as a disciplinary matter regardless of the outcome of any external investigation.**

The Practice Review is a multi-agency process which can lead to criminal action or a range of other actions decided upon on a case by case basis. Where a case is not referred to a Practice Review the LOG can still request at Multi Agency Professional Forum (MAPF), with the aim of learning from the case from a safeguarding perspective.

**Every effort should be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.**

#### **How long might an investigation last?**

It is reasonable to expect that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

Any record relating to an allegation should be retained until the staff member has reached normal retirement age or for a period of ten years from the date of the allegation if that is longer.

#### **If an allegation is proved to be false**

If an allegation is proved to be false, the Authority in consultation with relevant professionals should undertake a review to determine the reasons for the original accusation and to minimise the negative impact of the accusation on the individual concerned.

## **Whistleblowing Policy<sup>21</sup>**

“Whistleblowing” is the term used to describe a situation in which an employee discloses, internally or externally, any malpractice or wrong-doing that they observe or are aware of, as well as illegal acts or omissions at work.

Pembrokeshire Coast National Park Authority has a whistleblowing policy which seeks to encourage the highest possible standards of openness and accountability, whilst reassuring employees to feel confident in raising their concerns without fear of victimisation, subsequent discrimination or disadvantage.

“Whistleblowing” has shown itself to be an essential tool in combatting the abuse of children and vulnerable adults, as such the Authority’s whistleblowing policy encourages employees to raise concerns in any circumstance where they genuinely and in good faith believe that there is a risk that abuse is taking place.

## CONTACT INFORMATION

### Pembrokeshire Coast National Park Authority Safeguarding Leads

The Discovery Team Leader, Graham Peake, is the safeguarding lead for the Authority and is the first point of contact in relation to incidents and issues.

In his absence, contact either the Ranger Service Manager, Libby Taylor, or the Chief Executive, Tegryn Jones.

At least one of these PCNPA representatives should be available outside normal office hours.

#### **Graham Peake**

Mob 07452 350871

Email. [grahamp@pembrokeshirecoast.org.uk](mailto:grahamp@pembrokeshirecoast.org.uk)

#### **Libby Taylor**

**Mob. 07967 360689**

Email. [libbyt@pembrokeshirecoast.org.uk](mailto:libbyt@pembrokeshirecoast.org.uk)

#### **Tegryn Jones**

Mob. 07581 196240

Email. : [tegrynj@pembrokeshirecoast.org.uk](mailto:tegrynj@pembrokeshirecoast.org.uk)

### **Direct contacts for the local authority safeguarding teams in Pembrokeshire**

*\* Please note all initial disclosures or other concerns should be reported through one of the Safeguarding representatives listed above.*

#### **Children**

During Office Hours: Assessment Team – Tel: 01437 776444

Email: [ccat@pembrokeshire.gov.uk](mailto:ccat@pembrokeshire.gov.uk)

Outside of Office Hours: Emergency Duty Team – Tel: 0300 333 2222

#### **Adult**

During Office Hours: Duty Team – Tel: 01437 776056

Email: [adult.protection.team@pembrokeshire.gov.uk](mailto:adult.protection.team@pembrokeshire.gov.uk)

Outside of Office Hours: Emergency Duty Team – Tel: 0300 333 2222

#### **Other Useful Telephone Numbers:-**

NSPCC: 0808 8005000

Childline: 0800 1111

Domestic Abuse Helpline: 0808 8010800

## Footnotes

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<sup>1</sup> Children are defined as “persons aged under 18”.

<sup>2</sup> Vulnerable adults are defined as “persons aged 18 or over who has a “substantial learning or physical disability; a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs or a significant reduction in physical or mental capacity”. (Department of Health 2002)

<sup>3</sup> Wales Interim Policy and Procedures for the Protection of Vulnerable Adults From Abuse (January 2013) provides a comprehensive list of behaviour that is categorised as abuse.

<sup>4</sup> Children are defined as “persons aged under 18”.

<sup>5</sup> Vulnerable adults are defined as “persons aged 18 or over who has a “substantial learning or physical disability; a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs or a significant reduction in physical or mental capacity”. (Department of Health 2002)

<sup>6</sup> All Wales Child Protection Procedures 2008

<sup>7</sup> All Wales Child Protection Procedures 2008

<sup>8</sup> Guidance taken from the WCVA Criminal Records Unit and Safeguarding Service, January 2014.  
And From The Disclosure and Barring Service, November 2013

<sup>9</sup> The information was prepared following consultation with the Wales Council for Voluntary Action in January 2014

<sup>10</sup> Disclosure Barring Service October 2013, Updated January 2014

<sup>11</sup> Re-briefing for all seasonal staff is included in Pre-Season briefing.

<sup>12</sup> Safeguarding Tier 1 training currently provided by Pembrokeshire County Council.

<sup>13</sup> Transporting Children and Young People Safely (use of staff/volunteer vehicles) Warwickshire County Council

<sup>14</sup> Using photographs of children for publication (NSPCC)  
Information and Advice: Taking Photographs in Schools (Information Commissioners Office)

<sup>15</sup> Information Commissioner’s Office, Guide to the General Data Protection Regulation (GDPR), Children:  
<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/applications/children/>

<sup>16</sup> E-Safety: A Practical Guide for Schools. RM Education 2013

<sup>17</sup> Planning and Leading Visits and Adventurous Activities. RoSPA. 2013

<sup>18</sup> Education and Inspections Act 2006

<sup>19</sup> Safeguarding Young People on Work-Related Learning including Work Experience (DFCS 2010)

<sup>20</sup> Procedures based on Pembrokeshire Local Operational Group (LOG) Safeguarding Board guidance

<sup>21</sup> PCNPA Whistleblowing Policy 2002