

## Safeguarding Children & Adults at Risk Policy

<b>Designated Safeguarding Lead:</b>	Danni Sleet
<b>Designated Safeguarding Lead Contact details:</b>	15 Worship Street, London, EC2A 2DT <a href="mailto:danni@prosperogrp.com">danni@prosperogrp.com</a> 020 7404 6383 07464 548985
<b>Designated Safeguarding Officers:</b>	See Appendix A
<b>Date:</b>	25 <sup>th</sup> November 2021
<b>Review Date:</b>	25 <sup>th</sup> November 2022
<b>Author:</b>	Danni Sleet – Head of Compliance & Safeguarding
<b>Approved by:</b>	Rob Grays – Chief Executive Officer

### Introduction

Safeguarding is everyone's responsibility. Prospero Group acknowledge our duty to safeguard and promote the welfare of Children and Adults at Risk; and is committed to ensuring safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements. All Children and Adults at Risk, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.

This policy is mandatory for all Prospero Group Internal Employees and Temporary Workers, and will be widely promoted across the company. Failure to comply with this policy and Prospero Group's safeguarding procedures may result in disciplinary action, including termination of employment, contract and/or Work-Finding Services.

All Temporary Workers placed by Prospero Group are expected to familiarise themselves with arrangements for safeguarding Children and Adults at Risk at the Client/organisation where they are placed, and must have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report.

Prospero Group expect all Internal Employees and Temporary Workers to follow and promote good practice in safeguarding. In order to meet this requirement, individuals should:

- Read, understand, accept and act in accordance with this policy.
- Be vigilant and follow professional codes of conduct to maintain professional boundaries and safe working practices.
- Report any concerns or disclosures related to the protection and safety of Children and Adults at Risk.
- Undertake mandatory safeguarding training and awareness sessions where provided.

- Help educate learners/service users in placements regarding matters of keeping safe, including acting as a good role model.

## Definitions

**Adult at Risk** – any person aged 18 years and over, who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

**Child or Children** - any person under the age of 18.

**Client** – an organisation, which engages with Prospero Group to purchase Work-Finding Services. This includes, amongst others: Schools, Local Authorities, Care Homes, Universities, Parents/Carers and Private Sector organisations.

**Company** – is defined to mean Prospero Group.

**Internal Employee** – is defined to mean a full or part-time employee of Prospero Group.

**Prospero Group** – is comprised of three entities: Prospero Teaching, Prospero Health & Social and Prospero Integrated.

**Temporary Worker** – an individual receiving Work-Finding Services, delivered by Prospero Group. This includes, amongst others: Teachers, Tutors, Teaching Assistants, Care Assistants, Support Workers and Nurses.

**Work-Finding Services** – taken to mean recruitment activity, advertising of roles and provision of work-related training, provided by Prospero Group.

## Prospero Group’s commitment to safeguarding

This policy is designed to meet the above principles by ensuring:

- Prospero Group robust safer recruitment processes to ensures individuals who are known to be a risk to Children or Adults at Risk, do not gain access to them.; individuals whose actions suggest that they are a risk to Children or Adults at Risk, are detected at the earliest stage and prevented from continuing to work with Children and/or Adults at Risk; and individuals who intend to do harm are prevented at every possible stage from entering the workforce.
- Internal Employees and Temporary Workers understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to Children and Adults at Risk.
- There is an open and transparent culture which enables Internal Employees and Temporary Workers to raise concerns around Children/Adults at Risk, those that work with Children/Adults at Risk, and processes within Prospero Group.
- It is as simple as possible for an individual to report concerns about harm or risk, and that clear procedures are implemented where a safeguarding and/or Child/Adult or Risk protection issues arise. Where concerns are reported Prospero Group will ensure individuals are supported.
- Prospero Group has robust policies and procedures in place, which are reviewed and updated at least every 12 months.
- Prospero Group stays up to date with developments on safeguarding best practice, reporting and auditing safeguarding activities annually and addressing any areas for improvement.
- Prospero Group will report any concerns regarding any individual, or any potential safeguarding situation that it becomes aware of as soon as practicable to the appropriate authority and will co-operate in any ongoing investigations or assessments.
- Prospero Group will work in partnership with other services (including local authority children’s and adult social care) to ensure that those who are identified as being at risk of abuse are protected.
- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

## Relevant legislation and guidance

The principal legislation and guidance governing this policy is:

- Working Together to Safeguard Children 2018 (HM Government)
- Keeping Children Safe in Education 2021 (Department for Education)
- The Children Act 1989
- The Children Act 2004
- The Care Act 2014
- Care and Support Statutory Guidance 2020
- Information Sharing: Guidance for practitioners and managers. HM Government (2018)
- Rehabilitation of Offenders Act 1974
- Disqualification under the Childcare Act 2006 (2015)
- Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')
- The Prevent Duty, Departmental, Advice for Schools and Child Care Providers (2015).
- Modern Slavery Act 2015
- Human Rights Act 1998
- Local Safeguarding Partners/Arrangements/Local Safeguarding Adult Board
- Guidance for Safer Working Practice for Adults Who Work with Children and Young People (2019)

This policy should be read in conjunction with our other relevant safeguarding policies, including:

- Allegations and Misconduct Policy
- Complaints Policy
- Online Safety Policy
- Safer Recruitment Policy
- Temporary Worker Code of Conduct

## **Prospero Group's Designated Safeguarding Lead/Officers (DSL/DSO)**

The role of Prospero Group's DSL/DSO includes:

- Ensuring that all relevant Internal Employees and Temporary Workers have received safeguarding training appropriate to their role and continue receiving training to enable the development of skills and good practice when working with Children/Adults at Risk.
- Receiving and responding appropriately to all reports of safeguarding issues or abuse which are raised by Clients, Internal Employees, partner agencies/organisations or Temporary Workers.
- Ensuring that confidential, detailed and accurate records are kept of any concerns, reports or referrals related to Temporary Workers or Children/Adults at Risk that they work with.
- Liaising with Designated Safeguarding Leads/Officers in partner agencies/organisations.
- Acting as a source of support, advice and expertise for Internal Employees and Temporary Workers subject to concerns and liaising with other agencies, Clients, organisations and professionals.
- Supporting Internal Employees and Temporary Workers involved in safeguarding incidents and assisting them in challenging or reporting poor or unsafe practice.
- Referring any allegations of abuse or safeguarding concerns to the relevant Children or Adult social care department and if relevant, the police and/or the Local Authority's Designated Officer (LADO). In order to do this, the DSL/DSO will consult the Local Safeguarding Partnership Arrangements/Local Safeguarding Adult Board for the area in which the organisation is located. If the DSL/DSO requires further details or guidance on referral routes, these are located in Working Together to Safeguard Children (2018), Care and Support Statutory Guidance 2020, and in Keeping Children Safe in Education (2021).
- Reporting concerns to the Disclosure and Barring Service (DBS), including when an Internal Employee and Temporary Worker has been dismissed or left, where serious concerns have been raised about their conduct or behaviour, and the company believes they pose a risk to children/vulnerable adults. The DSL/DSO will complete the necessary referral

documents to the DBS and liaise with them thereafter if they have any further questions regarding the Internal Employee and Temporary Worker.

- Keeping senior management apprised of any safeguarding incidents and their outcome.
- Liaising with Prospero Group's Compliance Managers/Officers/Administrators and senior management regarding training and skill development programmes available to Internal Employees and Temporary Workers.
- Policy development (or overseeing this, including ensuring that all policies are updated as and when needed, but in any event on an annual basis).

## Categories of abuse

### Children

Child abuse can be one of four different categories as set out in Working Together to Safeguard Children (2018):

**Physical Abuse:** Physical abuse is a form of abuse which 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 or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional Abuse:** The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual Abuse:** 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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, 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.

**Neglect:** 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. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer 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); or
- ensure access to appropriate medical care or treatment.

This may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For detailed guidance on the signs, which may indicate abuse and neglect, please refer to the Department for Education's guidance "[What to do if you're worried your child is being abused \(2015\)](#)".

### Adults at Risk

The categories of adult abuse are set out in the Care Act 2014 and are as follows:

**Physical Abuse:** including assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.  
**Domestic Violence:** including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence.

**Sexual Abuse:** including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

**Psychological Abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

**Financial or Material Abuse:** including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**Modern Slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Discriminatory Abuse:** including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

**Organisational Abuse:** including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

**Neglect and Acts of Omission:** including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

**Self-neglect:** this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

For further information, please refer to the Department of Health and Social Care's "[Statement of Government Policy on Adult Safeguarding](#)".

## Recruitment and selection process

Prospero Group is committed to protecting Children and Adults at Risk through a careful recruitment and selection process (Safer Recruitment), a Whistleblowing Policy and guidance on appropriate behaviour (Code of Conduct). These policies should be read alongside this policy.

Prospero Group's rigorous procedures, following ASPCo's Compliance+ process ensures that any Temporary Workers found to have a history of unacceptable conduct or practice, will not be placed.

## Responding to safeguarding concerns

All Prospero Group Internal Employees have a responsibility to protect Children/Adults at Risk. This includes:

- Observing Prospero Group policies and processes.
- Attending recommended training and keeping their skills and knowledge concerning safeguarding and safer recruitment up to date.
- Reporting any concerns arising from meeting Temporary Workers or carrying out pre-placement checks to the DSL/DSO without delay and keeping a clear written record of all relevant information to be passed to the DSL/DSO.
- Reporting any concerns arising from Client/organisation visits placements to the DSL/DSO at the relevant Client/organisation and confirming, in writing, to Prospero Group's DSL/DSO that this has been done.
- Taking action, such as following the process detailed in the Whistleblowing Policy where there are concerns about practice.

All Temporary Workers working through Prospero Group are expected to keep Children and Adults at Risk safe by:

- Following Prospero Group policies including our Temporary Worker Code of Conduct.
- Following the Safeguarding Policy of each Client/organisation when on placement, including any Code of Conduct.
- Making the DSL/DSO at the placement Client/organisation aware of any concerns regarding any Children/Adults at Risk or any adults caring for or working with those individuals.
- Seeking advice and support from Prospero Group's DSL/DSO if there reason to believe that concerns have not been responded to appropriately or they have concerns about practice in the placement.

## **Dealing with allegations of abuse made against Temporary Workers**

All Temporary Workers placed on assignment are responsible for supporting safe behaviour and have responsibility to follow the guidance laid out in this policy and any related policies, such as Prospero Group's Temporary Worker Code of Conduct.

In accordance with the Care Act (2014), Working Together (2018) and Keeping Children Safe in Education (2021), where an organisation has received an allegation that a volunteer, supply staff or member of staff who works with Children/Adults at Risk has:

- Behaved in a way that has harmed a child/adult, or may have harmed a child/adult.
- Possibly committed a criminal offence against or related to a child/adult.
- Behaved towards a child/adult in a way that indicates he or she may pose a risk of harm to children/vulnerable adults or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/vulnerable adults.

a referral should be sent to the LADO within one working day, giving as much detail as possible.

Details regarding allegations that meet the harms threshold and concerns that do not meet the allegations threshold (referred to as 'low level concerns'), including who will take responsibility for this once a candidate is placed, are set out in Prospero Group's Allegations and Misconduct Policy which should be read alongside this policy.

## **Duty to make a referral to the DBS**

Where there is evidence that an individual has harmed, or poses a risk of harm, to a Child or Adult at Risk, Prospero Group have a legal duty to report that individual to the Disclosure and Barring Service. The DBS has statutory authority to bar an individual from working in regulated activity with Children and/or Adults at Risk in the UK.

A referral to the DBS will also be made if the individual resigns prior to an investigation being carried out or reaching its conclusion. If the accused individual resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

Prospero Group will not make any compromise/settlement agreement in the case of an individual deemed unsuitable to work with Children/Adults at Risk. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.

Anyone who is concerned about a Child's or Adult at Risk's welfare or who believe that a Child or Adult at Risk may be at risk of abuse should pass any information to the DBS or other appropriate authority as soon as possible and no longer than 24 hours after the initial concern.

## **Whistleblowing**

Individuals may find it difficult to raise concerns about colleagues, managers, individuals in placement or how safeguarding concerns are responded to within a setting. Prospero Group has a stand-alone Whistleblowing Policy which encourages individuals to raise concerns and provides details of outside organisations who can provide support and advice. Prospero Group aims to have an open and honest culture where safeguarding is responded to effectively, and both Internal Employees and Temporary Workers feel safe, supported and able to voice any concerns that they have in the knowledge that they will be responded to.

## Summary

Prospero Group will make this policy available to Clients and Temporary Workers by hosting it on our website.

Prospero Group will make this policy available to Internal Employees by hosting it on our shared drive, in the policies folder.

All Prospero Group Internal Employees and Temporary Workers must be aware of their professional duty to share information with other recruitment firms/organisations in order to safeguard Children/Adults at Risk. The public interest in safeguarding Children/Adults at Risk may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by Prospero Group.

## Appendix A – Designated Safeguarding Lead/Officers

<b>Designated Safeguarding Lead:</b>	Danni Sleet
<b>Designated Safeguarding Lead Contact details:</b>	15 Worship Street, London, EC2A 2DT <a href="mailto:danni@prosperogrp.com">danni@prosperogrp.com</a> 020 7404 6383 07464 548985
<b>Designated Safeguarding Officer:</b>	Josh Tipping
<b>Designated Safeguarding Lead Contact details:</b>	15 Worship Street, London, EC2A 2DT <a href="mailto:josht@prosperogrp.com">josht@prosperogrp.com</a> 020 3757 1000
<b>Designated Safeguarding Officer:</b>	Kate Marriott
<b>Designated Safeguarding Lead Contact details:</b>	15 Worship Street, London, EC2A 2DT <a href="mailto:KateM@prosperorecruitment.com">KateM@prosperorecruitment.com</a> 020 3757 1000
<b>Designated Safeguarding Officer:</b>	Simone Fawdon
<b>Designated Safeguarding Lead Contact details:</b>	15 Worship Street, London, EC2A 2DT <a href="mailto:simone@prosperoteaching.com">simone@prosperoteaching.com</a> 020 7404 6383
<b>Designated Safeguarding Officer:</b>	Haley Holman
<b>Designated Safeguarding Lead Contact details:</b>	Athol House, 65A Duke St, Chelmsford, Essex, CM1 1JE <a href="mailto:HaleyH@prosperoteaching.com">HaleyH@prosperoteaching.com</a> 01245 207280



**Designated Safeguarding Officer:**

Danusca Janowski

**Designated Safeguarding Lead Contact details:**

1 Quay St, Manchester, M3 3JE

danusca@prosperoteaching.com

0161 393 6725

**Designated Safeguarding Officer:**

Heather Brotherton

**Designated Safeguarding Lead Contact details:**

1 Quay St, Manchester, M3 3JE

heatherb@prosperohealthandsocial.com

0161 470 0999