



Safeguarding Policy 2025

1. Policy Objectives

- 1.1 Azure's policy and obligation is to prevent and reduce the risk of harm to adults and children from
 - behaviour(s) that may be or have been harmful to a child
 - persons that have behaved towards a child in a way that may indicate they pose a risk of harm
 - persons that behaved towards a child in a way that indicates they may pose a risk of harm
 - persons that may have committed a criminal offence against children or related to a child
 - abuse or any other type of exploitation (see 6).
- 1.2 The Company is obliged to inform the Local Authority Safe-guarding teams and/or their Designated Officer (LADO) of any behaviours or incidents relating to the above (see Appendix 5).
- 1.3 In addition, the Company is also obliged to share (with the LADO) concerns relating to:
 - A person's behaviour in their personal life which may impact on the safety of children who they are responsible for;
 - A person's behaviour regarding their own children;
 - The behaviour in the private or community life of a partner, member of the family or other household member.
- 1.4 The prime purpose of this document is to set out Azure's processes in support of its policy relating to the safeguarding of adults and children at risk.



The detail of this procedure is concerned with protecting the rights of adults and children at risk to live in safety, free from abuse and neglect.

It defines the various forms of abuse and sets out a process for dealing with suspected abuse.

Throughout this document the term “at risk” is used – this being synonymous with the term “vulnerable” (which is also frequently used in the same context).

This procedure is also intended to assist staff to identify and support adults and children who may be vulnerable to abuse and/or mistreatment.

2. Scope

The procedure is applicable in the Education services in particular and applies to all staff and those supported by Azure.

Whilst the terms staff or employee are used throughout, this procedure applies equally to any person who may be engaged in a voluntary capacity.

For individuals within Azure who may work with or have contact with vulnerable people DBS checks are undertaken. There is a separate DBS Checks Procedure (COPP0041).

3. Principles

Azure will work within the principles of statutory guidance - **Working Together to Safeguard Children, Keeping Children Safe in Education 2023**.

Azure is committed to ensuring that promotion of:

- | | | |
|---------------|-------------------|------------------|
| ▪ Empowerment | ▪ Prevention | ▪ Partnership |
| ▪ Protection | ▪ Proportionality | ▪ Accountability |



Every learner or employee has the right to live, train or work in a safe environment free of any level/type of abuse.

Azure is committed to doing everything possible to protect learners from abuse and to investigate and act appropriately where abuse is suspected.

Azure will work with all relevant Local Authority Safeguarding Boards – in particular Newcastle SAB, North Tyneside and Northumberland SAB - and with other relevant individuals or bodies to prevent abuse and safeguard adults and children at risk so far as possible.

Azure will deal sensitively and effectively with any suspected or actual incidents of abuse.

The principles of “Making Safeguarding Personal” will be considered throughout this procedure which will ensure that any safeguarding matter is person centred and outcome focused.

Azure will provide information to learners in a format which they can recognise/understand.

As relevant advocacy services will be utilised.

4. Definitions

4.1 Abuse/mistreatment

Abuse/mistreatment is described as behaviour that may cause significant harm or results in the serious exploitation of adults and children at risk. Abuse is a violation of an individual’s human rights by any other person or persons.

Abuse is any suffering which is incurred as a result of action or inaction of any person involved in the supporting of adults and children at risk. The abuse may be intentional, unintentional or the result of neglect. It may cause harm immediately, or over a period of time and it may cause harm temporarily or permanently.



4.2 Adult “at risk” (alternatively “vulnerable” adult)

An adult at risk is someone who is;

- aged 18 or over; and
- has needs for care or support (whether or not those needs are being met) and;
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of these needs is unable to protect him or herself against the abuse or neglect or the risk of it.

4.3 Child

Azure considers anyone who has not attained the age of 18 a child for the purposes of this procedure.

Azure considers that a child as so defined is, by virtue of age, automatically at risk (regardless of their personal circumstances).

5. Protection

Protection is facilitated through a range of actions including, but not limited to:

- promoting the safety of adults and children at risk thereby reducing the likelihood of abuse
- ensuring appropriate training is provided for staff (according to their role in the company). All staff, regardless of role, will be made aware of the issue of safeguarding.
- ensuring good practice, based on open inter-disciplinary procedures and guidance to be followed
- providing support in the aftermath of abuse
- addressing the needs of vulnerable adults who are perpetrators.



6 Form/types of abuse

Any or all the types of abuse - at 6.1 through 6.11 below - may be perpetrated as a result of deliberate intent, negligence or ignorance.

Incidents of abuse may be to one or more people and can occur on a single occasion or be multiple incidents over a period of time.

It is important to note that many situations may involve a combination of the categories listed.

Azure is not limited in its view of what constitutes abuse or neglect (as they can take many forms). The specific circumstances of each individual case will always be considered.

The main forms of abuse have been defined as:

6.1 Discriminatory

Including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment; because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual or transgender. This includes racism, sexism, ageism, homophobia or any other form of hate incident or crime.

6.2 Domestic abuse or violence

Including an incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is, or has been, an intimate partner or family member regardless of gender or sexual orientation. This includes psychological/emotional, physical, sexual, financial abuse; so called 'honour' based violence, forced marriage or Female Genital Mutilation (FGM).



6.3 Financial or material

Including theft, fraud, internet scamming, exploitation, 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.

6.4 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.

6.5 Neglect and acts of omission

Including ignoring medical, emotional or physical care needs, failure to access appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

6.6 Organisational (sometimes referred to as institutional)

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 a person'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.



6.7 Physical

Including assault, hitting, slapping, pushing, burning, misuse of medication, restraint or inappropriate physical sanctions.

6.8 Psychological (sometimes referred to as emotional)

Including 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 support networks.

6.9 Sexual

Including rape, indecent exposure, sexual assault, sexual acts, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts to which the adult has not consented or was pressured into consenting. It also includes sexual exploitation which is exploitative situations, contexts and relationships where the person receives “something” (e.g. food, accommodation, drugs, alcohol, mobile phones, cigarettes, gifts, money) or perceived friendship/relationship as a result of them performing, and/or another or others performing sexual acts.

6.10 Self-neglect

Includes a person neglecting to care for their personal hygiene, health or surroundings; or an inability to provide essential food, clothing, shelter or medical care necessary to maintain their physical and mental health, emotional wellbeing and general safety. It includes behaviour such as hoarding.



6.11 Radicalisation

Includes the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party who have their own agenda. Such an agenda may include extreme, often violent, ideas based on political, social or religious beliefs.

Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts.

People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, staff members, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

7. Indicators of mistreatment/abuse

Indicators are the signs and symptoms that draw attention to the fact that something is wrong. Categories and indicators, like definitions, need to be used – with care - as tools to aid professional practice and judgment.

The presence or absence of particular indicators does not prove abuse. However, they do signal a need to know more about an at risk individual's circumstances. For example such indications may be the result of phenomena such as divorce, separation, death of a significant person or significant change in home dynamics.

Indicators must be assessed by professionals. The important thing is to know what the signs are and how to report matters if it is believed a person at risk might need protection.



7.1 General indicators

The following list is not exhaustive but illustrates the types of general signs that may indicate abuse is occurring or has occurred

- Poor/non attendance
- difficulty getting access to the adult or child at risk
- difficulty in interviewing the adult or child at risk alone or with appropriate representation (children)
- isolation of the adult or child at risk
- agency hopping
- repeated visits to a General Practitioner or Accident and Emergency Department for no obvious medical reason or where there is no change in medical condition
- reluctance to seek General Practitioner help
- refusal of support by a known or previous trusted carer
- one or more other agencies (Police or Welfare) reveal concerns

7.2 Specific indicators

There are specific indicators in relation to the various types of abuse (as defined at section 6.0 above).

The detail of such indicators will be dealt with in detail in staff training for those staff working closely with adults and children at risk.



8. Designated Named Persons for safeguarding

8.1 Designated Named Persons for safeguarding

Azure has nominated individuals who are responsible for leading safeguarding work within Education services and Care & Support Services (Refer **Appendix 2** for contact details).

Any allegation or concern relating to staff employed in Education Services or students shall be referred to Designated Named Person for this Service.

Any allegation or concern relating to staff employed in Care & Support Services or students shall be referred to Designated Named Person for this Service.

Should the named person be unavailable then; other managers, staff, volunteers, clients and carers should contact the appropriate local authority directly. See **Appendix 3** for details.

8.2 Roles and responsibilities of the Designated Named Persons

The roles and responsibilities of the designated named person are to:

- ensure that all staff and volunteers are aware of what they should do and who they should go to if they have concerns that an adult or child at risk may be experiencing, or has experienced abuse or neglect;
- ensure that concerns are acted on, clearly recorded and referred to the appropriate local authority contact (refer **Appendix 3**) or to the allocated social worker/care manager where necessary;
- follow up any safeguarding referrals and ensure the issues have been addressed;



- manage and have oversight over individual complex cases involving allegations against an employee, volunteer, or student, paid or unpaid;
- consider any recommendations from the safeguarding process;
- reinforce the utmost need for confidentiality and to ensure that staff and volunteers are adhering to good practice with regard to confidentiality and security.

Because it is around the time that a person starts to challenge abuse that the risks of increasing intensity of abuse are greatest;

- ensure that staff and volunteers working directly with adults or children who have experienced abuse, or who are experiencing abuse, are well supported and receive appropriate supervision;
- ensure staff and volunteers are given support and afforded protection, if necessary, under the Public Interest Disclosure Act 1998: they will be dealt with in a fair and equitable manner and they will be kept informed of any action that has been taken and its outcome.

The Designated Named Person will review the information provided and any action taken by the Alerter.

9. Procedure for dealing with suspected abuse

9.1 Alerting

The person disclosing the abuse may be the abused person or it may be another. When it is another, this person will be known as the “Alerter”.



An “alert” is regarded as an expression of concern regarding the safety and well-being of an adult or child at risk by a person in contact with, or who has knowledge of the adult or child at risk.

An alert may be made by a wide range of people including carers, social workers, health workers, Police, voluntary workers, friends, neighbours and relatives.

At the point of alerting it is vital not to investigate.

A useful phrase to remember is “TED” -

Tell Me

Explain

Describe

Refer to **Appendix 1** for guidance on do’s and don’ts relating to this process.

9.2 Third party alerts

Where the Alerter is not an Azure employee – for instance they are from an outside agency or may be a family member or friend of the adult or child at risk - it is preferable that the information is brought to the attention of management (taking care not to involve anyone who may be implicated).

9.3 Azure staff alerts

When information is brought to any Azure employee (or volunteer) he/she should speak to his/her line manager who will involve the appropriate manager, including senior management.



9.4 The “Responsible Person”

The “Responsible Person” is the Designated Named Person as per Section 8 and Appendix 2.

9.5 Informing the authorities

9.5.1 Education

The Director of Education or Associate Director of Education (at the Director’s instruction) will inform the relevant Local Authority Safeguarding Team and/or LADO.

A log of events will be made clearly setting out the action taken from alerting to this point. A log book is utilised to record that there has been an incident - with the detail recorded and tracked utilising Safeguarding Record form COCF0007 are utilised.

The documentation will be made available to the Safeguarding Team – with copies always retained by Azure should any documentation be loaned or passed to any external safeguarding authority.

9.5.2 Care & Support Services

The Director of Support Services or Associate Director (at the Director’s instruction) will inform the relevant Local Authority Safeguarding Team.

Where services are registered with CQC, the reporting Associate Director will make a notification to CQC.

Each Local Authority has a clearly defined Safeguarding Procedural Framework. Each Associate Director will have a copy of the relevant Framework for the authority they work within (and clearly, if associate director’s work across



authorities they will have copies of all the relevant frameworks).

The Director will follow the defined procedural framework.

The support services director/associate director will deal with the management of the safe-guarding process as set out within the relevant framework.

A log of events will be made clearly setting out the action taken from alerting to this point. A log book is utilised to record that there has been an incident - with the detail recorded and tracked utilising Safeguarding Record form COCF0007 are utilised.

The documentation will be made available to the Safeguarding Team – with copies always retained by Azure should any documentation be loaned or passed to any external safeguarding authority.

9.6 Allegations/suspension of staff

Where an allegation relates to a member of staff, it is the norm to suspend staff immediately in order to protect all parties (the adult or child at risk and the member of staff named as allegedly perpetrating the abuse).

Where a member of staff is suspended the Designated Named Person will follow Azure's personnel guidelines regarding the suspension.

The Chief Executive is made immediately aware of any suspension of staff.



9.7 Criminal act (considerations)

The Designated Named Person will assess if there has been a criminal offence and will report this accordingly.

The Police will be advised if it is thought a member of staff has committed a criminal offence or, immediately, if a crime has been witnessed.

According to the circumstances it may be necessary to treat the area as a crime scene – and any directions from the Police will be complied with.

This may be undertaken as part of the reporting to the Safeguarding team.

9.8 Disciplinary procedure (invocation)

Azure may invoke its Disciplinary Procedure either within the ongoing Safeguarding Procedural Framework and/ or any Police investigation. However, no action will be taken that could jeopardise Safeguarding or Police investigation(s) and liaison with Safeguarding and/or Police will be effected.

Where disciplinary action is taken this will be undertaken in accordance with the Disciplinary Procedure and documented accordingly.

10. Confidentiality/data security

10.1 General principle

Azure is committed to maintaining confidentiality wherever possible and information around safeguarding issues should only be shared with those who need to know and/or are a proper part of the processes.



10.2 Overriding obligation (precedence over confidentiality)

An individual's wishes cannot over rule an organisation's legal duty to act.

Informed consent to share information should be obtained, but if this is not possible and there are people at risk, it may be necessary to override the requirement to gain such consent.

10.3 Whistleblowing

Whistleblowing is a process to enable staff or volunteers to confidentially raise concerns and have those concerns taken seriously.

Azure has a formal Whistleblowing procedure (COPP0014) and this procedure is provided to all staff within their comprehensive staff handbook (and a copy of that staff handbook is also provided to the Charity's Board of Trustees).

Employees who "blow the whistle" in respect of a perceived or actual wrongdoing have special legal protection - however only if the disclosure was made in good faith (Public Interest Disclosure Act 1998).

Provision within the act makes it unlawful for the person making the disclosure to be penalised or suffer a detriment for disclosing the information.

Where staff disclose information by way of whistleblowing they should be aware that their identity can only be kept confidential if it is reasonably practicable to do so.

Whilst it is not easy for an employee to complain about a colleague's behaviour, the overriding priority is for the protection and safety of the adults and children at risk.



11. Requirement to forward details to the Disclosure and Barring Service

The Director of Educations or Director of Support Services (as appropriate), in consultation with the relevant outside and involved agencies will follow the current guidelines and practice regarding information being forwarded to the Disclosure and Barring Service.

12. Evaluation/continuous improvement

The management team will evaluate the circumstances / practice that lead to the Safeguarding Procedural Framework requiring to be invoked with the view of addressing any practice issues or areas where the service could be improved to try and minimise any re-occurrence of the situation that arose.

There is a commitment to continuously improve and to develop/ improve strategies to safeguard the vulnerable students within the education services

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13. Training and awareness raising

All levels of staff working directly with at risk persons, will receive accredited training (refreshed three yearly) in understanding what abuse is, how to alert and what happens when an alert is made.

Such staff will receive training relevant to their level to ensure that they understand their roles and responsibilities regarding dealing with any alleged abuse and any subsequent Safeguarding procedures that are to be invoked/ followed.

All such staff will receive annual in house refresher training.

General staff, not directly supporting or training adults and children at risk, will have been made aware of safeguarding issues.

Safeguarding responsibility is reflected in Azure job descriptions.



14. Boundaries

14.1 Families and other visitors

It is possible that staff may come into contact with children (not registered within Azure's education setting) when working. For example being during the course of a parents' evening or where Support Staff attend a client and they have a child with them -it will be the responsibility of the family to maintain the child care and not see Azure staff as taking this responsibility whilst they engage with their relative.

Staff must not allow themselves to be left alone with the child and if the family request that Azure staff stay with the child to enable them to engage with their relative, this must be declined.

It is appropriate to have proper communication with the child but that there should be no physical contact or engagement.

Whilst the child or children are not the responsibility of Azure, should the member of staff have any concerns regarding the child's/children's welfare they must report their concerns to their line manager who will deal with the matter in the context of safe-guarding.

14.2 Phones/photographs/social media

Members of staff who have mobile phones with the facility to take photographic images, must not, in any circumstances, take photographs or create images on their phones (or any camera), of learners they or others support.

If a learner requests their photograph to be taken, or that their image is electronically captured, this can only be done by the use of the learners own photographic/digital equipment or equipment belonging to the Education department.



Where the company is using photographs to promote the work of Azure, then consent and agreement should be sought and confirmed in a written agreement. This agreement will be undertaken in conjunction with the learner and their parent/carer.

The learner will be given information as to how the image is to be used and the limitations of the images.

Any member of staff found taking photographic images using their own digital equipment/camera facilities could be disciplined and potentially dismissed from the company.

Staff must not record any details relating to any learner, colleague or the company on any social media facility (unless sanctioned by management – and then only if there is good and proper reason).

15. Professional Disagreements

In general Azure has good working relationships with other agencies.

Where an occasion arises that there is a difference of professional views, Azure will refer to the relevant Local Authority Safeguarding Board procedures. This may include implementation of the Whistleblowing procedure.

Azure will ensure that the professional disagreement will not detract from ensuring that the adult or child at risk is safeguarded and that their welfare and safety is paramount throughout.

16. Review

This procedure will be reviewed at least annually – such review involving the Director of Education Services, Director of Support Services and the Chief Executive.



Any revisions will be properly communicated to all concerned – with copies of the revised procedure properly disseminated through staff meetings/training.

17. Useful contact information (Internal Only)

Refer to **Appendices 2 and 3**

18. Other relevant procedures and documents

18.1 Procedures

- Azure's Whistleblowing Procedure (in staff handbook)
- Azure's Grievance Procedure (in staff handbook)
- Disclosure and Barring Service Guidelines

18.2 Useful legislation

- Education Act 2002
- Education Regulations 2014
- Keeping Children safe in Education 2023
- Mental Health Act 1983 (amended 2007)
- Disability Discrimination Act 1995 (amended 2005)
- Family Law Act 1996
- Protection from Harassment Act 1997
- Crime and Disorder Act 1998
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003



- Protection of Vulnerable Adults Scheme 2004
- Domestic Violence Crime and Victims Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005 and 2009 DOL amendments
- Public Interest Disclosure Act 1998
- Equality Act 2010
- Children's Act 2004 (amended 2007)
- The Care Act 2014
- Children and Families Act 2014



Appendix 1 Guidance in relation to “TED”

Do:

Remember the role of the Alerter is to

- pass on information
- stay calm
- listen rather than ask questions
- believe the person and make them aware the information provided will be treated seriously
- be empathic
- reassure them that they are not to blame
- be aware that medical evidence may be needed
- write down everything that is said in the person’s own words as soon as possible, include the date and time.
- describe the circumstances in which the disclosure came about (noting
- the setting and anyone else who was there at the time)
- be aware that your report may be required later as part of legal action or disciplinary procedure.
- explain to the adult or child at risk what you are going to do. This could include seeking medical attention if necessary
- call an ambulance if required
- call the Police if it is an emergency or if a crime has been committed
- inform your line manager or the appropriate/available designated Named Person (or, exceptionally, with the relevant Local Authority contact)
- only share information with colleagues following discussion with management



Do not:

- appear shocked, horrified, disgusted or angry
- stop the person from speaking freely
- ask leading or investigative questions
- promise to keep secrets (you have a duty to pass this information on)
- make judgement
- offer the victim of a sexual and/or physical assault a bath, food or drink until after a medical examination
- contaminate or remove possible forensic evidence
- question or make contact with the alleged abuser
- alert the alleged abuser to the situation

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Appendix 2 Designated Named Person(s)



Appendix 3 Contact numbers

Azure HQ/main switchboard 01670 733966



Appendix 4

Designated Named Person(s)' responsibilities include:

- Advising the LADO as to whether Northumberland Children and Adult Safeguarding Partnership (NCASP) procedures are properly applied and implemented in the Company;
- Providing advice, information and guidance to all staff within the Company;
- Being the senior manager within the Company (Department/Service) to whom all allegations or concerns are reported;
- Referring allegations in accordance with the Company's and NCASP procedures;
- Gathering any additional information that may have a bearing on the allegation e.g. previous known concerns, care and control incidents, etc;
- Providing the subject of the allegation with information and advise them to inform their union or professional body;
- Should the allegation be unfounded, considering a referral to social care for support or to the police if the allegation is deemed to be deliberately malicious or invented;
- Attending meetings with the LADO, Police as and when required
- Liaising with the LADO;
- Liaising with Corporate Services where Company disciplinary action is required;
- Ensuring risk assessments are undertaken when required;
- Ensure that effective reporting and recoding systems are in place which allow for the tracking of allegations through to the outcome;
- Undertake appropriate checks with data the Company may hold;
- Providing reports and information as required;



- Raising the awareness of the need to empower children, young people and adults who are in vulnerable positions by ensuring all understand whistle-blowing and complaints procedures;
- Ensuring appropriate and relevant training programmes are in place for all and accessed by all staff;
- Ensuring relevant support programmes are in place, for staff, parents/families and young people.



Appendix 5

The Designated Named Person(s) will meet with the LADO to:

- Identity why the alleged or acknowledged behaviour raises concerns about suitability to work with children and young people;
- If relevant, review any previous concerns or allegations regarding the conduct of the person the allegation relates to;
- Ensure that arrangements are in place to protect the child(ren) involved and any other children affected;
- Consider what support should be provided to the person the allegation relates to and others who might have been affected;
- Consider what support should be provided all children who may have been affected directly and indirectly;
- Make recommendations where appropriate regarding suspension, or alternatives to suspension;
- Determine what information can be shared, with whom and when;
- Agree arrangements to inform the child's parents, and consider how to provide them with support and information during any enquiries;
- Ensure where necessary there has been a Child Protection Enquiry and/or police investigation and consider the implications;
- Ensure that investigations will be sufficiently independent;
- Consider the need to share statements and evidence with an employer