



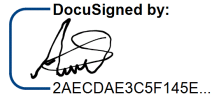
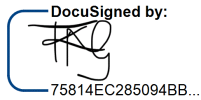

Safeguarding Policy

The Centre of African Entrepreneurship (The CAE) is committed to ensuring that people who use our services are offered a safe environment in which to meet and work with us, supported by vetted and suitably qualified staff, where they will be safeguarded from all forms of abuse, where working practices are upheld to minimise the risk of abuse.

The CAE is equally committed to ensuring the safety and well-being of all personnel, be they paid or unpaid, staff, trustees or volunteers and all those people who come into contact with the charity, for whatever reason and however fleeting the circumstances.

This policy applies to all Trustees, staff, volunteers, and all personnel representing, authorised by or contracted to The CAE on whatever term (temporary, sessional, part-time etc.) and also, where appropriate, beneficiaries of The CAE (meaning the organisation as a body of people).

Trustees, staff and volunteers are requested to read this policy and sign to say that they understand it and undertake to comply with it. Failure to do so may result in disciplinary procedures. The CAE will provide reasonable support to all personnel to ensure they understand the policy. Beneficiaries may be asked to sign up to and comply with related policies e.g. code of conduct for the Centre (meaning all the premises we may deliver our services from).

Policy	Safeguarding Policy	
Draft dated	February 2023	
Last reviewed	July 2024	
Chair of the Board	Agostinho Indequi	 2AECDAE3C5F145E...
Designated Safeguarding Officer	Kimberley Mamhende	 75814EC285094BB...
CEO	Franck Banza	 F3B759068FB1404...



The Board of Trustees is held ultimately responsible by the Charity Commission* for safeguarding in The CAE, to lead a culture which operates in line with the Charity Governance Code* which notes the “right to be safe”. The Board is also responsible for ensuring that a serious incident report is made to the Charity Commission in a timely manner, should there be a safeguarding incident that directly affects personnel or beneficiaries of The CAE. This includes anyone connected with The CAE even if overseas*.

Context

The Social Services and Well-Being (Wales) Act 2014 (the Act), Part 7 Safeguarding*, is the driver and legal framework for safeguarding in Wales. Introduced by the Act, a duty on local authorities to make enquiries regarding an adult at risk makes the safeguarding of adults statutory in Wales, placing it on the same legal footing as is children’s safeguarding.

All Part 7 Safeguarding guidance, known as the Wales Safeguarding Procedures, can be found on the app www.safeguarding.wales. Training materials to support understanding of the policies are available online and free to access*.

The CAE encourage all trustees, staff and volunteers to become familiar with the Wales Safeguarding Procedures by accessing www.safeguarding.wales and downloading the app to workplace equipment (computer, laptop or phone where supplied) for reference, support and common terms*: e.g. *practitioner – any person (paid or unpaid) who role brings them into regular contact with children or adults at risk.*

Responsibility to report

All Trustees, Staff and the Volunteers of The Centre of African Entrepreneurship have a responsibility to be alert to the possibility of abuse, to undertake all offered training, especially that which will inform them to identify abuse, and to report abuse, internally in the first stage, but also to be prepared to make a formal safeguarding report to Social Services or the Police.

Lead contacts for safeguarding

Role	Name	Contact details	Responsibilities
Designated safeguarding officer (DSO)	Kimberley Mamhende	Phone: 07878553369 Email: kim.m@caentr.org	To be the point of contact for all safeguarding issues, concerns
Alternative contacts and involved personnel			
Chair	Agostinho Indequi	Email: indequi@hotmail.com	Decision-making body and alternates should any named individual be involved in an allegation. Board of Trustees to make serious incident report to Charity Commission



A **duty to report** (make a safeguarding report) is placed on all relevant partners of the local authority, but this does not include the third sector, as a rule. The duty may be passed onto voluntary services and agencies through their contracts and service level agreements with other relevant partners e.g. health boards, schools, the local authority, the Police, probation and youth justice. It may then apply to specific projects rather than whole organisations.

The Act places an expectation of reporting on all agencies working with children or adults who may be at risk, where there is **reasonable cause to suspect** abuse, neglect or harm.

Definitions of those who “at risk”

Adult at risk - Describes anyone over 18 years of age who is experiencing or is at risk of abuse or neglect and has needs for care and support (whether or not the authority is meeting any of those needs), and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it. (S 126 of the Social Services and Well-being Act 2014). An appropriate report will trigger safeguarding enquiries led by the local authority.

The CAE works mainly with adults from a diverse range of ethnic backgrounds, many of whom are refugees and asylum seekers. Due to life circumstances predating their arrival in the UK, cases of mental ill-health, trauma and current stress and poverty are frequently seen in our beneficiaries, creating potential vulnerabilities to abuse, exploitation and harm.

Child at risk - This describes an individual under the age of 18 years who is experiencing or is at risk of abuse, neglect or other kinds of harm; and who has needs for care and support (whether or not the authority is meeting any of those needs). When a child has been reported under section 130 of the Social Services and Well-being Act 2014, the local authority shall make, or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child’s welfare under section 47 of the Children Act (1989).

Children and young people under the age of 18 are seen mostly through their family ties to our adult beneficiaries, and may visit our Centres where there are no suitable alternatives for childcare.

Regarding direct services for anyone under the age of 18 years, the section in Appendix 4 details considerations for this particular demographic.

Staff will remain alert to any sign of poor parental care, abuse, neglect or harm even when children remain the responsibility of their parents/guardians, and are expected to report this in line with our procedures.

The CAE has a duty of care to anyone who comes into contact with our organisation. Anyone placed in direct work with children through contractual arrangements with The CAE must be able to show an appropriate DBS check for their role (enhanced or enhanced with barring list if in regulated activity) and be obliged to abide by safeguarding policies at least equivalent to any in use by The CAE at the time.

Definition of abuse (Working Together to Safeguard People volume 1*)

The five main categories of abuse and neglect, all of which now apply equally to children and adults are listed below :



- physical abuse
- sexual abuse
- psychological abuse
- neglect
- financial

Other forms of harm may occur through domestic abuse, discrimination (or hate crime) deliberate targeting for exploitation (sometimes “mate crime”), sexual exploitation, labour exploitation and modern slavery, FGM and honour-based violence. Also, bullying, both in person and online, online trolling, harassment, sexting and grooming.

Abuse can take place in any setting, public or private, or through remote means online, using social media, etc, and can be perpetuated by anyone. It should be noted that abuse frequently occurs where there is an imbalance of power between the perpetrator and the victim. No-one in The CAE should seek to use their position, status or perceived power to abuse, exploit, harm, humiliate, bully or exclude another person.

Rights & Responsibilities

Responsibilities of The Centre of African Entrepreneurship Trustee Board:

- To designate a person responsible for safeguarding

This is:

Name: Kimberley Mamhende

Role: Executive Assistant to the CEO

Contact details: kim.m@caentr.org

They will be the central contact point for all safeguarding concerns.

- To ensure all staff and volunteers are offered training to be made aware of the reasons why an individual might be in need of safeguarding.
- To ensure that the appropriate agencies are notified if abuse is identified or suspected (based on reasonable cause).
- To ensure that support and where possible the means to secure the safety of individuals are put in place .
- To ensure that all referrals to services include the relevant information in relation to identified risk and vulnerability .
- To make use of all eligible Disclosure and Barring Service (DBS)* checks for roles where there is access to or work with Children or Adults at risk .
- To ensure a serious incident report is made to the Charity Commission in a timely manner where a) beneficiaries of The CAE have been harmed due to actions or inaction on the part of The CAE personnel or other beneficiaries b) a member (trustee, staff, volunteer etc.) of The CAE has directly harmed an individual using the services of The CAE c) where a partner agency member has harmed a beneficiary of the The CAE.



Responsibilities of The Centre of African Entrepreneurship Staff and Volunteers:

- To be understand and comply with the safeguarding policy
- To take appropriate action in line with the safeguarding policy of The Centre of African Entrepreneurship
- To ensure that their own behaviours do not cause harm, abuse or neglect of any person they meet in the course of their role in The CAE.
- To provide the necessary documentation that will allow access to eligible DBS checks, and to honestly declare any unspent convictions on recruitment, and any other convictions that occur during their relationship with The CAE.

IT is NOT the role of The CAE or any individual (trustee, staff or volunteer) to investigate a safeguarding incident. This is the remit of social services, the Police or the NSPCC, in certain situations. It is the role of The CAE to report a reasonable cause to suspect abuse to social services, an alleged victim should never be expected to make a report themselves.

Rights and Support for those who report abuse

All those making a complaint or allegation or expressing concern, whether they are staff, volunteers, service users, carers, or members of the general public should be reassured that:

- Their rights to be protected will be upheld
- Their views and concerns will be taken seriously
- Their comments will usually be treated confidentially, but their concerns may be shared with the appropriate authorities if they or others are at significant risk.
- Anyone making a complaint or allegation or expressing concern must be reassured that this will in no way impact on the quality of service or support that they receive from The CAE.

Employed personnel who “whistle-blow” must follow the correct procedure, and will be supported and protected in accordance with the PIDA*

Safe Recruitment of Staff and Volunteers

Where a staff member or volunteer is being recruited to work with children or with adults at risk, the recruitment panel should include at least one member who has been trained in Safer Recruitment Practice.

All staff and volunteers taking part in the activities organised by The Centre of African Entrepreneurship, will be required to complete a self-disclosure form equivalent to a basic check asking about unspent convictions only.

Staff and volunteers placed in roles which are regulated activity* with adults and children will be required to present a DBS certificate with the appropriate barring list check to the general secretary before undertaking their duties. This would include any role requiring the delivery of personal care to a child or adult. This check is mandatory for regulated activity roles. Regulated activity roles also mean that The CAE is under a duty to report* to the DBS (see Allegations page 11)



Roles which will entail regular and unsupervised contact with children (but do not meet the definition of regulated activity) will be eligible for enhanced DBS checks, the certificate for which must be presented to the general secretary within 3 months of appointment. During this period, the post-holder may not work unsupervised. This would include a role caring for supervising, teaching or training a child under the age of 18 years on a frequency of weekly or less.

Roles which will entail regular contact with adults deemed vulnerable or at risk due to age, illness or disability, with opportunity to develop a relationship of trust (but do not meet the definition of regulated activity) will be eligible for enhanced DBS checks, the certificate for which must be presented to the general secretary within 3 months of appointment. During this period, the post-holder may not work unsupervised. This would include a role delivering training regularly to the adult, in person or by remote means.

DBS certificates on the update service will be considered if they meet the appropriate standards for level, workforce and are not older than 6 months since the date of disclosure.

Recruitment methods:

- Interview
- Two references (at least one from previous employer/volunteer placement manager, “personal” character from a person with familial ties to the applicant will not be accepted, content may be discussed with the referee)
- Probation period of 6 months

Applicants who have recently arrived in the UK will not have records that the DBS can access. Some counties offer a certificate of good conduct*, but it is recognised that asylum seekers may be reluctant to be brought to the attention of the country they have left. In addition, some applicants may lack the appropriate documentation to prove their identity. In all roles which are not regulated activity, it will be considered whether the applicant can deliver the role under constant supervision. Supervision for DBS purposes means having constant oversight of the person’s delivery of their role to ensure that their conduct and demeanour remains consistent with the standards of The CAE and provides a service that upholds the safety and safeguarding of beneficiaries.

Induction and Training for Staff & Volunteers.

- Staff and volunteers must read and sign this policy before working with children or adults at risk
- All Staff and volunteers will attend a safeguarding course as part of their induction and further safeguarding courses as appropriate to their role and contact with children, families and adults at risk
- Staff and volunteers should have health and safety procedures explained to them as part of their induction

Staff Supervision

All staff working with children and families, adults at risk, whether employed directly or provided from another agency, must receive regular (at least 1 session every 4 weeks) 1-to-1 supervision with a suitably qualified and experienced senior member of staff or external consultant. This will



include their attitude and suitability for working with children, families, adults at risk (as appropriate) as well as performance in the delivery of their role, assessment and discussion of individual service user welfare and responding to possible safeguarding issues.

The supervisor will also sensitively enquire regarding the mental health and well-being of the staff member, in the understanding that enacting safeguarding is emotionally draining and in the approach that it is right and necessary to discuss “how a case makes you feel”, without discussing the actual case itself. The supervisor is expected to report to the Safeguarding officer any concerns that the staff member is suffering to allow accommodations to be discussed with the staff member, which may include professional support to be offered beyond the remit of supervision sessions.

DBS Requirements

- Staff, volunteers and any members of the organisation undertaking regulated activities under the safeguarding act will need to undertake an Enhanced DBS check.
- Upon recruitment, all staff/volunteers/trustees need to either present a valid DBS check or consent to undertaking one in the first month of their employment. We also advise individuals to sign up to the update service.
- On a yearly basis, individuals not working directly with service-users or vulnerable groups need to complete self-disclosure forms. Those working with vulnerable adults or undertaking regulated activity will need to undertake a new check to keep it up to date.

Safeguarding Procedures

Any staff member, trustee or volunteer, who has reason to believe that someone with The CAE organisation is at risk of abuse, neglect or harm, MUST

- Take all reasonable steps to secure the immediate safety of the individual – this may include making a 999 call for emergency care or police protection
- Report their concerns, and any actions they have taken to the designated safeguarding officer
- Write down an accurate report of any disclosure, information or the circumstances of their suspicions, including details of the victim(s) or witnesses with quotes in their own words
- Provide all known information to enable the safeguarding officer to decide on the next course of action, possibly in consultation with social services
- A conversation must be conducted with the individual, wherever possible, by the most appropriate person (if not the safeguarding officer) to discuss the views, wishes and feelings of the individual regarding their safeguarding, their consent, their rights and their personal outcomes. Consider the timing, environment, the personnel involved, who should, and should not be present to support the individual (an adult has the right to speak in private, a parent may not be the right person to support their child) and allow time for the individual to go at their own pace
- A first stage report to social services may be made by telephone, within 24 hours of the issue arising



- A formal written report will be supplied to social services within a further 24 hours from the safeguarding officer
- Social services are required to share feedback on your report 7 working days from the formal report being received. If this does not occur, the safeguarding officer may make enquiries for this feedback
- The safeguarding officer will consider how The CAE can continue to support and safeguard the individual who is the subject of a safeguarding report throughout ongoing procedures.
- The safeguarding officer will escalate the safeguarding concern to the Board where it appears that a serious incident report to the Charity Commission would be appropriate
- The safeguarding officer will escalate the safeguarding concern using the protocols of the regional safeguarding board where there occurs professional disagreement over addressing a safeguarding issue (<http://www.westernbay.org.uk/western-bay-safeguarding-boards/>)
- The safeguarding officer will report on safeguarding activity within The CAE to the Board on a periodic basis.

All documentation will be signed by each named individual involved, dated and securely stored with access available only to designated personnel.

Confidentiality

All staff should be aware that they must treat safeguarding information in confidence for these reasons:

- to prevent information being used or shared inappropriately,
- to protect all the people involved,
- but there is nothing in law (DP2018 or GDPR)* that prevents information being shared to prevent serious harm or report a crime (before or after the event).

Information should therefore be shared purely on a “need-to-know” basis, involving only the necessary individuals and agencies.

What is abuse*?

The following is a non-exhaustive list of examples for each of the categories of abuse and neglect, all of which now apply equally to children and adults:

- physical abuse - hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions;
- sexual abuse - rape and sexual assault or sexual acts to which the vulnerable adult has not or could not consent and/or was pressured into consenting;
- psychological abuse - threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks (coercive control is an act or pattern of acts of assault, threats, humiliation, intimidation or other abuse that is used to harm, punish or frighten the victim);
- neglect - failure to access medical care or services, negligence in the face of risk taking, failure to give prescribed medication, failure to assist in personal hygiene or the provision of food, shelter, clothing; emotional neglect



· financial - unexpected change to their will.; sudden sale or transfer of the home; unusual activity in a bank account; sudden inclusion of additional names on a bank account; signature does not resemble the person's normal signature; reluctance or anxiety by the person when discussing their financial affairs; giving a substantial gift to a carer or other third party; a sudden interest by a relative or other third party in the welfare of the person; bills remaining unpaid; complaints that personal property is missing; a decline in personal appearance that may indicate that diet and personal requirements are being ignored; deliberate isolation from friends and family giving another person total control of their decision-making.

Working with Adults

Some roles working with adults may be subject to enhanced DBS checks e.g. training and teaching, even if mainly online.

Consent – informed consent should be sought from any person about whom staff are considering making a safeguarding report. The mental capacity of the adult to make a decision about consent should be assumed unless the individual has been formally assessed to lack capacity. In which case, a “best interests” decision should be made.

NB Exceptions: consent is not required to report a crime or to call for emergency medical help – 999 Police or Ambulance

The duty to report, where applicable, in theory overrides any withheld consent, but the staff member should still seek consent from the adult at risk, and where this is withheld, should explain why they are duty-bound to make a report, which will also be based on the reasonable cause to suspect abuse. The staff member should seek to keep the individual informed of the process which will follow. In some cases, this may mean a different contact person.

Obtaining consent

An adult can choose to give or withhold consent to a safeguarding report being made about them, except when the situations below apply. Always try to gain consent from the adult about whom you wish to make a safeguarding report.

A report can be made without their consent when:

- Other people may be placed at risk by the situation (e.g. known perpetrator having access to similarly at risk individuals, or to a child)
- Undue influence of another person is suspected (coercion, threat or pressure applied)

Each adult at risk, with capacity, has the right to withhold consent and where they choose to do so, should be fully informed of any actions you may still take regarding their safeguarding.

Reports made without consent should state this and explain why consent was not obtained, or sought, if this is the case. This should not affect the process of enquiries made by the local authority social services.

The Act is rights based

Rights of an adult with capacity:

- Right to make decisions deemed “risky” by others
- Right to refuse consent to a safeguarding report



- Right to refuse to participate in a safeguarding investigation (unless police are involved)
- Right to change their mind!

Refusing to participate does not relieve the local authority of its duty to make enquiries /investigate, but may reduce the effectiveness of the process.

All refusals must be recorded and the ensuing decisions made.

Consent regarding a Child

Obtaining consent

Staff should be prepared to make a safeguarding report of suspected abuse and neglect - with or without the child's consent – but ALWAYS try to gain consent from the child.

Where a child appears to have the capacity and understanding, they should be consulted, and their consent obtained to ensure their wishes and feelings are known.

Parent about a child:

When deciding whether to obtain parental consent before making a safeguarding report about a child, the overriding consideration for staff should be to ask whether this places the child at (greater) risk of harm. Suspicions of the possibility of FGM, and honour-based violence, in particular, could pose a threat of greater harm to the child/young person from their family/community, and the specific guidance in the WSP should be adhered to: [Social care Wales \(safeguarding.wales\)](https://www.wales.nhs.uk/sites/default/files/2018/02/Social_care_Wales_safeguarding_wales.pdf)

In other circumstances, staff should try to obtain consent from the parent(s)/carer of the child, unless it would increase the risk of harm to the child. The aim is to work in partnership with the parent(s) to safeguard the child and protect them from harm.

Advocacy

Advocacy is defined as any action that supports and represents the voice of the child or adult at risk ensuring that their rights are upheld and the child or adult at risk's views and experiences are heard and respected. It is vital in safeguarding procedures if the individual concerned has any communication issues.

All individuals who are involved in safeguarding procedures and who might experience barriers in participating fully, including all children, are entitled to advocacy.

Practitioners must aim to enable them to overcome barriers by providing appropriate support/accommodations in the first instance. Their role might then be to ensure that more specialist support is accessed, and to promote access to appropriate advocacy.

An informal advocate might be a carer, friend or relative, as long as they are an 'appropriate individual', NOT allegedly involved in a safeguarding situation. If there is no appropriate individual available or willing, the local authority has a duty to appoint an independent professional advocate.

The role of The CAE should be to promote advocacy for anyone individual who would benefit from it whilst safeguarding procedures are taking place. This may be due to language barriers, barriers of understanding or communication, anxiety or other mental ill-health, stress or trauma.



APPENDIX 1: Standards for direct work with children

The abuse of children and young people (physically, emotionally, financially, sexually and neglect) is a reality that everybody should be aware of. Children and young people may be abused regardless of their age, gender, religious beliefs, race, sexual orientation, culture or ability. Most often abuse is perpetrated by a person known by the child.

All those working with children and young people in community groups provide an important link in identifying individuals who have been or are at risk of being harmed in this way.

The Centre of African Entrepreneurship is committed to the protection of children and the safeguarding of their welfare. We are totally committed to the right of all children to grow, develop and thrive in a safe, caring environment.

Protecting children from abuse is an integral part of the policy and practice of the entire organisation's work.

The Centre of African Entrepreneurship recognises that good safeguarding requires everyone to be clear about what the organisation is trying to achieve, and agree aims and policy statements for that purpose.

- All new paid staff and volunteers will receive induction into our policies and procedures for safeguarding and promoting the well-being of children and young people. Staff and volunteers will also be informed of any guidelines or training which will enable them to implement the policy statement.
- We will work in partnership with parents and carers of children wherever possible and encourage an open, honest and non-judgemental channel of communication by providing information that will help parents, carers and children exercise their rights*.
- We will ensure that all our services are provided in a manner that respects as far as possible the dignity, pride and identity of the children.
- We will ensure that all children are treated equally and will not be discriminated against on the basis of their culture, race, religion, language, gender or disability.
- Ensure that all members are aware of the procedures through which they may raise concerns and express their concerns about the welfare of children.
- Ensure that an effective, open and accountable complaints procedure is made available to the children, parents and carers and that any dissatisfaction of services is responded to and acted on in a speedy, effective and open manner.
- Monitor the appropriateness and quality of services including the views of partner agencies regarding our safeguarding and broader service offer

We will work, where possible, in co-operation with other agencies to ensure that the safety and welfare of the children comes first and is paramount to our aims and objectives. All organisations who work with The Centre of African Entrepreneurship must abide by this Child Protection Policy.



Code of Conduct

All staff and representatives must:

- a) report concerns that a child or adult at risk is a victim of abuse or sexual exploitation immediately in accordance with Wales Safeguarding Procedures as detailed in this policy.
- b) undertake induction and training on this policy which is relevant and appropriate to their position so that they can undertake their responsibilities effectively and with confidence.
- c) cooperate fully and confidentially in any investigation of concerns and allegations.
- d) respond to a child or adult at risk who may have been abused or exploited in accordance with the Reporting Guidelines and in accordance with their views whenever possible
- e) Identify, risk assess and minimise potential situations of risk for beneficiaries of The CAE.
- f) Be alert to and seek to avoid potential situations which may lead to staff behaviour being misinterpreted or viewed as inappropriate towards beneficiaries
- g) ensure, **before** making images of children or adults at risk, that specific permission is on record from the parent or carer. Any photographs or videos must depict all persons in a manner that is respectful, (e.g. ensure that they are adequately clothed, avoid sexually suggestive poses and any item in the image which would offend the individual or the viewer, that all geographic identifiers and “tags” are removed before publication of images) that all personnel depicted have an opportunity to remove their consent to the images being used before they are published, and are never published alongside the full name and further identifiers of the individuals.
- h) ensure that any image or recorded case history of a child or adult at risk does not place him/her at risk or render him/her vulnerable to any form of abuse.
- i) ensure that the Codes of behaviour is complied with if any child or adult at risk is to participate in any activity other than as a beneficiary, e.g. a campaigning event, awards ceremony, panel or any other event or in internet social networking;
- j) All staff, trustees or volunteers of The CAE who use electronic communications in the course of their duties to communicate with beneficiaries will do so in a manner that remains consistent with the code of conduct above; always professional (from your The CAE email address and from The CAE equipment wherever possible), during the usual hours of “business” for The CAE, written in a manner that could, and might be shared/viewed by your line manager/safeguarding officer, on every occasion.

The CAE staff, trustees, volunteers and representatives must never:

- a) hit or otherwise physically assault or physically abuse children or other adults;
- b) have sexual intercourse, or engage in any sexual activity, with anyone under 18 years of age, regardless of the age of consent locally, or any adult at risk whose ability to give consent may be compromised, or who is a service user/beneficiary of the services of The CAE. Mistaken belief in the age of the child is not a defence.
- c) develop relationships with children or adults which could in any way be deemed exploitative or abusive;
- d) act in ways that may be abusive or may place a child or adult at risk of abuse;



- e) use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- f) behave physically in a way that is inappropriate or sexually provocative;
- g) have a child/children or adult at risk with whom they are working to stay overnight at their home
- h) sleep in the same bed as a child/adult at risk with whom they are working;
- i) sleep in the same room as a child/adult at risk with whom they are working;
- j) do things of an intimate, personal nature for children or adults that they can do for themselves;
- k) condone, or participate in, behaviour of children or adults which is illegal, unsafe or abusive;
- l) act in ways intended to shame, humiliate, belittle or degrade children or adults, or otherwise perpetrate any form of emotional abuse;
- m) discriminate against, show unfair differential treatment to, or favour particular children or adults to the exclusion of others;
- n) act as negotiator in or assist the process of financial settlement between the family of a child/adult victim of sexual abuse or exploitation and the perpetrator;
- o) spend excessive time alone with a child or an adult at risk away from others (including in vehicles) or spend time in a child/adult's home unless exceptional circumstances apply and there is written, formal approval to do so from their line manager.

All staff and representatives should aim to:

- a) plan and organise their work, service delivery and the workplace so as to minimise risk of harm to themselves, and a risk of abuse, exploitation or harm coming to a child or an adult at risk, for whatever reason they are on the premises, or connected with The CAE;
- b) promote a culture of openness in relation to all safeguarding issues, where any issues or concerns can be raised and discussed;
- c) ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour can be challenged;
- d) talk to service users about their contact with staff or others and encourage them to raise any concerns;
- e) empower all beneficiaries and communicate to them their rights, what is acceptable and unacceptable, and what they can do if there is a problem, which will not affect the quality of service provided to them;
- f) communicate to all beneficiaries what standards of professional practice they can expect of The Centre of African Entrepreneurship staff and what to do if they feel that The Centre of African Entrepreneurship staff are falling short of these standards.;
- and g) proactively seek to safeguard all children and adults at risk known to The CAE, this may include the staff, volunteers and trustees themselves.

Allegations of abuse perpetrated against a child or adult at risk made against a staff member, trustee, or volunteer, or where it is considered that the practitioner is unsuitable for roles with regular contact with children or adults at risk

- it is essential that these are investigated in line with Wales Safeguarding Procedures in partnership with the Local Authority Designated officer (LADO) See [Social care Wales \(safeguarding.wales\)](https://www.wales.gov.uk/safeguarding.wales)
- The Chairman should also be notified of the allegation and will be the first point of contact for the Local Authority Designated Officer appointed by The Local Authority Safeguarding Board to investigate.

Tandem safeguarding procedures may also be necessary



- In order to protect them, the staff member will be given alternative duties or suspended for the duration of the investigation.

Any person placed in a regulated activity role (or likely to undertake regulated activity in future e.g. student teacher) will be reported to the DBS under the duty to report at the point at which they are permanently removed from regulated activity due to harm of a person in their care.

Provision of standard reporting form to include:

- Date and time of what has occurred and the time the disclosure was made /information was shared
- Names of all people who were involved and contact details where known
- What was said or done by whom
- Any action taken to enact immediate protection or emergency medical response

List of all agencies contacted, name and contact details of individuals in each agency, and what they have been told

- Any further action e.g. suspension of worker/volunteer
- Names of person reporting and to whom reporting

Informing parents

- The decision about whom and when to contact parents or carers should only be taken in consultation with social services. The timing of these contacts will also be decided at this point.
- The decision about who and when to contact other agencies beyond the Local Authority Social Services Department, e.g Police and School should only be taken in consultation. The timing of these contacts will also be decided at this point.



Appendix 2: General Practice which supports safeguarding

Premises

- Sign all visitors in and out of the premises. Supervise all visitors and guests around the building to ensure safety of all beneficiaries and staff.
- Ensure there are at least two adults per ten children of a gender mix which is appropriate to the age and gender of the children in the group.

Do not mix groups of children in a wide age range, e.g. 12 years olds with 3 years olds.

Children under the age of 16 years must not be left in a position where they are responsible for the well-being of other children (or adults), even family members, on our premises.

- Ensure health and safety procedures are adhered to.
- Written and signed consent forms are required from each family (a parents/carer/guardian who has parental responsibility for the child/ren) before any children are taken off site, for any reason other than for urgent medical attention or in the care of social services.

Procedure to be followed in the event of a child (or adult at risk usually accompanied by a carer/support worker) being found unattended in a Children's Centre

- It is important to ensure the safety of the child/adult. Inform the manager at the setting where you are working. Provide a safe place for the child/adult to wait (age appropriate). Ensure their comfort; a drink, biscuits, books...

Check the premises for the missing parent/carer, to ensure they are not actually on site.

- Help should be summoned immediately by contacting the local social services department or the local police station. This may depend on what is known, or not known about the child/adult in question and/or their circumstances.
- If the parent / carer returns, you need to discuss your concerns regarding the child being left unattended and explain the need to share your concerns with social services. Ensure that you are returning the child/adult to the right and appropriate parent/carer – ask for ID, check with the child/adult. If they are in any way unsure, try phoning the person you/they expect to see, and if this does not help the matter, consult with social services/the police.
- Discuss with your line manager and refer to Social Services as appropriate. Inform the manager. Record the incident.

Repeated incidents may mean that policies should be reviewed, information for parents/carers reviewed and re-distributed, or the services provided amended, or even closed.

Prevention



Safeguarding and promoting the welfare of children depends on effective joint working and integrated systems. The Centre of African Entrepreneurship will ensure that all staff work within the context of interagency plans rather than in isolation and all staff will use the Common Assessment Framework (CAF.)

Risk assessment

Risk assessment is an integral part of any activity and vital to ensuring the safety of beneficiaries and staff. All The Centre of African Entrepreneurship activities whether in a setting or outside must be risk assessed and a copy given to the Manager.

Safe Environment

All of the The Centre of African Entrepreneurship premises and capital project improvements will be designed and maintained to safeguard children and adults at risk, their carers, staff and other users from accidents and harm, and adhere to current legislation for Health and Safety. It is the responsibility of all staff to ensure a safe environment for all beneficiaries and their colleagues.

Information to Parents

Any The Centre of African Entrepreneurship's leaflets designed for users will reference and include a statement on safeguarding.

Procedure to be followed in the event of reported or anonymous allegations of abuse

- All allegations of abuse must be referred the same day to social services.
- Listen, clarify and record accurately the information given. - Request that the informant refer directly to social services. Even if they agree to do so, you still need to refer to social services. - Refer to social services.

NB The anonymous contact may remain anonymous, both in their contact with The CAE and with social services. Anyone contacting Social Services as a practitioner of The CAE or related agencies must give their full contact details to the report-taker in social services.

Insurance

The CAE holds Public Liability insurance for all activities.



Links and references

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

<https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity>

<https://www.gov.uk/guidance/reporting-serious-incidents-to-the-charity-commission-during-the-coronavirus-pandemic>

<https://www.charitygovernancecode.org/en/front-page>

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees#working-overseas>

[Overview of the Social services and well-being \(Wales\) Act 2014 | Information and Learning Hub \(socialcare.wales\)](#)

[Safeguarding procedures - training materials \(Adults\) | Information and Learning Hub \(socialcare.wales\)](#)

www.safeguarding.wales

[Social care Wales \(safeguarding.wales\) glossary](#)

[Statutory guidance | Information and Learning Hub \(socialcare.wales\)](#)

<https://www.gov.uk/dbs-check-applicant-criminal-record>

<https://protect-advice.org.uk/>

<https://protect-advice.org.uk/pida/>

[You searched for legal guide - Safeguarding Board Wales](#)

<https://gov.wales/sites/default/files/publications/2019-05/working-together-to-safeguard-people-volume-i-introduction-and-overview.pdf> page 7 para 24 abuse

<https://www.childcomwales.org.uk/uncrc-childrens-rights/>

[NSPCC Help for adults concerned about a child Call 0808 800 5000](#)

[Help for children and young people Call Childline on 0800 1111](#)

<https://www.gov.uk/government/publications/dbs-guidance-leaflets>

<https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>

<https://www.gov.uk/employers-checks-job-applicants>

<https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>



APPENDIX 3: DECLARATION FORM

THE CENTRE OF AFRICAN ENTREPRENEURSHIP SAFEGUARDING POLICY & PROCEDURE

I CONFIRM THAT I HAVE READ THE POLICY AND PROCEDURES ON THIS SUBJECT.

I UNDERSTAND THE CONTENTS AND I AGREE TO FOLLOW THESE PROCEDURES WHEN I AM WORKING OR VOLUNTEERING FOR:

Organisation :

Signed :

Name :

Date :

Address :

Email :

Telephone :

Date Implemented : February 2021

Date Last Reviewed : January 2023



Appendix 4 - Project Specifications

We (TheCAE) expect members of staff, volunteers and trustees to comply with the organisation's safeguarding policy. This Appendix addresses additional elements of specific projects, but is not a substitute for the main Safeguarding Policy. It is important for all members of the organisation to comply with procedures detailed in the main policy, as well as this Appendix.

The purpose of this Safeguarding Appendix is to ensure that all our services are safe for all personnel, including all paid and unpaid staff, volunteers, trustees and anyone that comes into contact with our services.

Community Transport Project (CTP)

Safe Recruitment of Staff and Volunteers

All staff and volunteers in roles with regulated activity* with adults and children will need to undertake an Enhanced Disclosure and Barring Service check.

*Regulated activities relating to adults are split into six different categories, based on the type of work they involve:

1. Providing healthcare.
2. Providing personal care.
3. Providing social work.
4. Assistance with general household matters.
5. Assisting with a person's own affairs.
6. Conveying a person to a place of social work or care.

As one of the activities undertaken under the CTP involves transporting service-users from their home to places of health care, the project is considered as having regulated activity and hence all staff and volunteers would need to undertake an Enhanced DBS.

Standard procedure in unexpected circumstances

Actions to take if service-user is unresponsive:

- If they do not respond to a knock on the door, then try ringing their mobile.
- If they are in sight and physically unresponsive, call emergency services then report to the CAE safeguarding team.
- If not in sight but unresponsive then contact the next of kin, then flag it with CAE safeguarding team.

Wellbeing Activities Under CTP

All project staff and volunteers need to comply with the organisation's Code of Conduct.



Remember, project staff and volunteers should keep themselves safe in all situations and be able to call for help when necessary.

Actions taken by service-users may be out of the staff but ensure you let them know of the implications of their actions.

If an unexpected incident were to occur whilst outdoors, always ensure there is means to call for help.

It is the Caseworker/Project Staff's responsibility to do research before undertaking any outdoor activity. Aspects to consider include but are not limited to;

- Mobile phone coverage
- Tide times
- Where the vehicle is parked

If immediate help is needed, contact emergency services whilst staying in a safe and secure place. Reassure the service-user that help is coming.

In a non-emergent situation, ensure communication is made to The CAE main offices.

Food Bank Delivery

Standard procedure in unexpected circumstances

In all situations, it is expected that the service-users will be responsive and present to take the food parcel. However, in a situation where they do not respond, despite maybe having confirmed they would like to receive the parcel, the following procedure should be followed;

Procedure for in case someone does not come to the door.

If you cannot raise them by knocking or calling their phones, it would be necessary to call next of kin or emergency contact.

Procedure:

Text or call service-user when on the way to delivery.

On arrival, knock the door or call them for them to collect the parcel from their doorstep.

If there is no answer, leave the parcel on the doorstep and send a follow up text message to confirm delivery. Include notice for service-users to confirm receipt of the parcel.

If previous text is unresponded, follow procedure: Either return and check address to check if parcel has been taken from door, or ring and text again.

If no communication, then contact next of kin to ensure they are aware of the service-users situation.