

Safeguarding Policy

As a social enterprise which works primarily with vulnerable adults, Paperworks is committed to keeping safe the adults who use our service. We are also committed to ensuring the wellbeing of our staff, volunteers, and visitors. This policy outlines how we offer this support.

See also: Prevent Policy; Health and Safety Policy; Violence Against Employees Policy.

Paperworks acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

The Policy Statement and Procedure have been drawn up in order to enable Paperworks to:

- promote good practice and work in a way that can prevent harm, abuse and coercion occurring; and
- ensure that any allegations, disclosures of abuse or suspicions are dealt with appropriately and that the person experiencing abuse is supported.

It is acknowledged that a significant number of vulnerable adults are abused each year and it is important that Paperworks has a Safeguarding policy and procedure to follow in order to reduce such incidences occurring.

In order to implement the policy, Paperworks will work:

- to promote the freedom and dignity of the person who has experienced or is experiencing abuse;
- to promote the rights of all people to live free from abuse and coercion;
- to ensure the safety and well-being of people who do not have the capacity to decide how they want to respond to the abuse they are experiencing; and
- to manage services in a way which promotes safety and prevents abuse.

Paperworks will:

- ensure that all directors, staff, trainees and volunteers are familiar with this policy and understand what procedures they need to follow should a safeguarding incident occur;
- ensure that all staff have appropriate training and regular briefings regarding safeguarding policy and procedure. Training for all staff is mandatory at the level appropriate for their position at Paperworks and this will be refreshed every three years;

- conduct risk assessments and identify appropriate steps to minimise risk, this risk assessment will then be implemented across the team;
- work with other agencies within the framework of the Leeds Safeguarding Adults Partnership and Safeguarding Adults in North Yorkshire;
- make a referral to the Adult Social Care / Care Management Team as appropriate;
- act within its confidentiality policy and will gain permission from the vulnerable adult in question before sharing information about them with another agency, unless covered by the exemptions stated in the Safeguarding Adults Procedure;
- endeavour to keep up to date with national developments relating to preventing abuse and welfare of adults;
- ensure that the named persons in the Safeguarding Procedure understand their responsibility to refer incidents of adult abuse to the relevant statutory agencies (e.g. police / Adult Protection unit); and
- ensure Disclosure and Barring Service (DBS) enhanced checks are undertaken for all members of staff and volunteers.

The named people for Safeguarding Adults are:

- Joanne Forsey
- Susan Taylor

All staff and volunteers must be given a copy of and adhere to the safeguarding procedure. All staff and volunteers are expected to sign the policy document to acknowledge they have read and understood the policy and will adhere to the policy.

If you require support or advice on implementing this policy or accompanying procedure contact the named person for Safeguarding.

DEFINITIONS

Safeguarding adults is the multi-agency procedure used to protect someone from abuse or neglect. The procedures are specifically for those people who are over the age of 18 years of age, who:

- may need health and social care support to maintain their independence and wellbeing; and
- may be unable to take care of themselves; or
- may be unable to protect themselves against harm or exploitation.

In addition to this we have a duty of care to all staff, volunteers, and visitors to the organisation. This includes both protecting them from harm as well as equipping them to protect themselves from risk.

WHAT CONSTITUTES ABUSE

No Secrets (2000) is a document which gives guidance to local agencies that have a responsibility to investigate and take action when a vulnerable adult is believed to be suffering abuse. It offers structure and content for the development of local inter-agency policies, procedures and joint protocols which will draw on good practice nationally and locally.

Abuse is defined in broad terms by No Secrets as “a violation of an individual’s human and civil rights by any other person or persons” (p9).

“Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not consented, or cannot consent. Abuse can occur in any relationship and may result in... harm to, or exploitation of, the person subjected to it” (p9).

WHAT CONSTITUTES HARM

Harm is defined in No Secrets as follows:

“‘Harm’ should be taken to include not only ill treatment (including sexual abuse and forms of ill treatment which are not physical), but also the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social or behavioural development” (p9).

TYPES OF AND INDICATORS OF ABUSE

There are seven forms of abuse that should be used to describe the experience of adults at risk. These are listed below alongside possible indicators for each type of abuse.

Indicators are the suspicious signs and symptoms which draw attention to the fact that something is wrong. The presence of one or more indicators does not confirm abuse. However, a cluster of several indicators may indicate possible abuse and a need for further assessment. The lists of indicators are not exhaustive.

Any or all of these types of abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.

Physical Abuse: including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

Possible signs and symptoms include:

- any injury not fully explained by the history given;
- injuries inconsistent with the lifestyle of the adult at risk;
- bruises and / or welts on face, lips, mouth, torso, arms, back, buttocks, thighs;
- clusters of injuries forming regular patterns or reflecting the shape of an article;
- burns, especially on soles, palms or back; from immersion in hot water, friction burns, rope or electric appliance burns, cigarette burns;
- multiple fractures, lacerations or abrasions to mouth, lips, gums, eyes, external genitalia;
- marks on body, including slap marks, finger marks;
- oral injuries;
- injuries at different stages of healing;
- misuse of medication;
- forced marriage; and
- unauthorised deprivation of liberty.

Sexual Abuse: including rape, sexual assault, and sexual acts to which the adult at risk has not consented, could not consent, or was pressured into consenting.

Possible signs and symptoms include:

- significant change in sexual behaviour or attitude;
- pregnancy in an adult who is unable to consent to sexual intercourse;
- poor concentration;
- the adult at risk appears withdrawn, depressed, stressed;
- unusual difficulty or sensitivity in walking or sitting;
- torn, stained or bloody underclothing;
- bruises, bleeding, pain or itching in genital area;
- bruising to thighs or upper arms;
- oral injuries;
- self-harming behaviour; and
- sexually transmitted diseases, urinary tract or vaginal infection, 'love bites'.

Emotional / Psychological Abuse: including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming,

controlling, intimidation, coercion, harassment, verbal abuse, isolation, or withdrawal from services or supportive networks.

Possible signs and symptoms include:

- change in appetite;
- low self-esteem, deference, passivity, and resignation;
- unexplained fear, defensiveness, ambivalence;
- emotional withdrawal;
- sleep disturbance;
- self-harming behaviour;
- forced marriage; and
- unauthorised deprivation of liberty.

Financial Abuse: including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Possible signs and symptoms include:

- sudden unexplained inability to pay bills or maintain lifestyle;
- unusual or inappropriate bank account activity;

- lasting power of attorney or enduring power of attorney obtained when the adult at risk lacks the mental capacity to give consent;
- carer withholding money;
- recent change of deeds or title of property;
- unusual interest shown by family or others in the adult at risk's assets; and
- evasiveness from the person managing financial affairs.

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

Possible signs and symptoms include:

- physical condition of the adult at risk, for example, bedsores, unwashed, ulcers;
- clothing in poor condition, for example, unclean, wet, ragged;
- inadequate physical environment;
- inadequate diet;
- untreated injuries or medical problems;

- inconsistent or reluctant contact with health or social care agencies;
- failure to engage in social interaction;
- malnutrition when not living alone;
- inadequate heating;
- failure to give prescribed medication;
- poor personal hygiene; and
- failure to respond to an identified risk of harm.

Discriminatory Abuse: including abuse based on a person's (perceived or actual) race, sex, disability, faith, sexual orientation, or age; other forms of harassment, slurs or similar treatment or hate crime / hate incident.

Possible signs and symptoms include:

- lack of respect shown to an individual;
- signs of a sub-standard service offered to an individual;
- repeated exclusion from rights afforded to citizens such as health, education,
- employment, criminal justice and civic status; and
- failure to follow the agreed care plans for discriminatory reasons, which can result in the person being placed at risk.

Institutional Abuse: “Neglect and poor professional practice... may take the form of isolated incidents of poor or unsatisfactory practice, at the one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other. Repeated instances of poor care may be an indication of more serious problems and this is sometimes referred to as institutional abuse” (No Secrets p10).

The indicators for other forms of abuse will be relevant. However the service provision context of institutional abuse leads to additional signs and symptoms such as:

- inappropriate or poor care;
- misuse or inappropriate use of medication;
- neglect of service user(s);
- misuse of restraint or inappropriate restraint methods;
- sensory deprivation e.g. denial of use of spectacles, hearing aid, etc.;
- lack of respect shown to personal dignity;
- restricted access to toilet or bathing facilities;
- restricted access to appropriate medical or social care;

- lack of flexibility and choice, for example, mealtimes and bedtimes;
- lack of personal clothing or possessions;
- denial of visitors or phone calls;
- lack of privacy;
- lack of adequate procedures e.g. for medication, financial management;
- controlling relationships between staff and service users;
- poor professional practice;
- high number of complaints, accidents or incidents;
- an unauthorised Deprivation of Liberty; and
- non-adherence to the Mental Capacity Act.

Patterns of Abuse

Patterns of abuse vary and reflect very different dynamics.

These can include:

- serial abuse in which the perpetrator seeks out and 'grooms' vulnerable individuals (sexual abuse usually falls into this pattern as do some forms of financial abuse);

- long term abuse – may occur in the context of an ongoing family relationship such as domestic violence between spouses or generations;
- opportunistic abuse – such as theft occurring because money has been left around; other kinds of abuse taking place because of working 1:1 in an enclosed space with the door shut;
- situational abuse - arises because pressures have built up and / or because of difficult or challenging behaviour;
- neglect of a person’s needs because those around them are not able to be responsible for their care, for example if the carer has difficulties attributable to such issues as debt, alcohol or mental health problems;
- institutional abuse which features poor care standards, lack of positive responses to complex needs, rigid routines, inadequate staffing and an insufficient knowledge base within the service;
- unacceptable ‘treatments’ or programmes which include sanctions or punishment such as withholding of food and drink, seclusion, unnecessary and unauthorised use of control and restraint, over-medication, and the use of medically unsound ‘treatments’;
- failure of agencies to ensure staff receive appropriate guidance on anti-racist and anti-discriminatory practice;

- failure to access key services such as health care, dentistry, prostheses;
- misappropriation of benefits and / or use of the person's money by other members of the household; and
- fraud or intimidation in connection with a will or property or other assets.

Abuse can take place in any context. It may occur when an adult at risk lives alone or with a relative; it may also occur within the workplace, nursing, residential or day service settings, within hospitals or other places previously assumed safe, or in public places.

WHO MIGHT COMMIT ABUSE

These procedures are relevant to all incidents of abuse, regardless of who has committed them.

Anyone might commit abuse, including:

- a member of staff, a proprietor or service manager;
- a member of a recognised professional group;
- a service user, or other adult at risk;
- a volunteer;

- a member of a community group such as place of worship or social club;
- a spouse, relative or member of the person's social network a carer; i.e.: someone who is eligible for an assessment under the Carers (Recognition and Services) Act 1995;
- a neighbour, member of the public or stranger; or
- a person who deliberately targets adults at risk in order to exploit them.

Incidents between service users involving the abuses defined above are categorised as safeguarding incidents and must be handled as such.

RECRUITMENT AND EMPLOYMENT

All prospective employees will be provided with a clear outline of safeguarding expectations of the role prior to receiving a job offer. This includes clear direction of safeguarding requirements including internal training, external training and DBS checks which must be completed as part of the role.

Clear references must be received for volunteers and staff before commencing the role. All staff and volunteers must undergo a DBS

check. No member of staff or volunteers will work independently with a trainee until a clear DBS check is seen and recorded.

Staff will undergo an induction which will include safeguarding training and knowledge of relevant risk assessments. Specific risk assessment relating to individual service users will be shown to staff prior to working with the individual on a 1:1 basis. Staff will inform volunteers of how to support and protect individual service users in line with the confidentiality policy.

TRAINING

All staff will receive safeguarding training from a professional body. Quarterly safeguarding briefings will be delivered by the named safeguarding person for all staff. This will include how staff should manage and record incidents.

There will be opportunities to share information on a daily basis to observe changes in behaviour so appropriate steps can be taken to minimise risk.

Staff will respond to changes in best practice and this will be reflected in staff and volunteer training.

PROFESSIONAL BOUNDARIES

Staff and volunteers are made aware of their professional boundaries. Professional boundaries set the limits to the worker/service user relationship. This includes personal and material boundaries. If these boundaries are not respected then there is increased potential for abuse to occur. The observation of clear boundaries may also protect the staff member from unfounded allegations.

Training is given to all staff regarding what would constitute boundary crossing. Staff should clearly understand what the aim and objectives of the service are, and how their role fits within this. It should be clear what the limits of their job are and what is unacceptable. Unacceptable behaviours include:

- Meeting a service user outside working hours;
- Any sort of personal relationship;
- Accepting payment or gifts for services;
- Becoming a friend on Facebook;
- Sharing personal contact information; and

- Inappropriate physical contact.

RISK ASSESSMENTS

Risk Assessments should identify situations where abuse could occur and indicate what actions need to be taken to reduce the risks. This includes general risk assessments for vulnerable individuals during every day working practice in addition to risk assessments for specific requirements of the individual.

Risk assessments should show steps required to minimise risks which will then be briefed to all staff.

Following an incident as appropriate a risk assessment will be completed to inform future practice.

All training staff who will be responsible for writing risk assessments will receive risk assessment training.

A risk matrix is used to dictate appropriate resourcing levels and to inform support requirements. The risk matrix is updated monthly to reflect changes within the organisation and the needs of service users.

For example:

- Staff receiving additional training may move up to a higher level enabling them to support a trainee with higher support needs;
- New services users joining the organisation who were not previously covered will be given a risk level as part of their initial assessment; and
- Changes in an individual's behaviour or health may result in an increase or decrease in risk level.

PROTECTION OF STAFF AND VOLUNTEERS

It is important that all staff members and volunteers do not place themselves in a vulnerable position where they are susceptible to abuse or allegations of abuse. Always tell another person what you are doing and why.

Staff completing 1:1 work should be aware of their surroundings and avoid putting themselves at risk by working in an enclosed space out of view of other staff members. Staff should position themselves so they have access to and from any rooms with clear exits. In addition staff should inform colleagues of their whereabouts and any perceived risks.

Staff should not place themselves in a position where they are spending excessive amounts of time alone with one trainee away from other people.

Staff must not delivery any personal care. If an incident occurs in a high-risk area for example, toilets, a member of staff may assist while respecting the privacy of the individual. The member of staff must inform another member of staff about the incident and the actions they intend to follow.

Staff are to maintain appropriate personal boundaries at all times and support trainees to understand their own personal boundaries.

A risk assessment must be completed prior to making a home visit.

ROLES AND RESPONSIBILITIES

“No individual agency’s statutory responsibility can be delegated to another. Each agency must act in accordance with its duty when it is satisfied that action is appropriate” (No Secrets).

Everyone, both paid employees and volunteers, within Paperworks has a responsibility to:

- participate in appropriate safeguarding training and understand what abuse is;
- promote the safety of service users;
- listen carefully to vulnerable adults and their carers;
- prevent, recognise and act on abuse;
- be aware of and act in accordance with the organisation's safeguarding adults policy and procedures;
- understand their role in responding to and reporting suspected abuse and take appropriate action in line with this policy wherever abuse is suspected; and
- call on emergency services appropriately where there is immediate danger.

If you have any concerns or questions about safeguarding, contact the named safeguarding person stated above.

Individual Responsibilities

Process to be followed by **staff**:

1	Incident Occurs – an incident is anything that occurs which is out of the ordinary, out of character, or something which may escalate
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2	Make situation safe and remove any hazards. Do not put yourself in danger. In an emergency situation contact 999
3	Do not discuss the confidential aspects of the incident with any other member of staff, volunteers or trainees
4	Do not give advice or attempt to mediate following a safeguarding incident.
5	Staff not dealing directly with the incident should ensure other trainees are safe and manage any anxieties
6	Inform the named safeguarding person. If the named safeguarding person is not available inform the next most senior member of staff – Finance Manager, Business Development Manager who will escalate this as necessary
7	Complete an incident log as soon as possible and send this to the person who you informed verbally on the same day that the incident occurred. The incident log must contain only factual and accurate information. If you are not able to recall exactly what occurred, do not include any assumptions
8	The named person will decide if this is a safeguarding incident and will report this in line with local authority practice.
9	This form must be signed by the CEO and stored securely. A hardcopy

	should be kept in the incident log stored in the locked training cabinet
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If the **named safeguarding person** has been involved in an incident they should follow the above steps up to **step 6**. At this point they should follow the process for the **named safeguarding person** (below).

Process to be followed by **named safeguarding person**:

1	Named safeguarding person is informed that an incident has occurred
2	Check situation has been made safe and hazards have been removed
3	Do not discuss the confidential aspects of the incident with any other member of staff, volunteers or trainees
4	Do not give advice or attempt to mediate following a safeguarding incident
5	Staff not dealing directly with the incident should ensure other trainees are safe and manage any anxieties
6	Named safeguarding person would contact adult social care central point of access to make a safeguarding referral.

	<p>Leeds – Telephone: 0113 222 4401</p> <p>Harrogate – Telephone: 01609 534527</p> <p>For safeguarding advice in Leeds: 0113 224 3511</p> <p>To make this call the named person will require the individuals full name, address and date of birth. Safeguarding referrals must be made as soon as possible after the information has been received</p>
7	Complete incident form and print copy for CEO to sign. File hard copy in locked training filing cabinet
8	Ensure senior member of staff has been informed of incident the day which it occurs
9	A staff member will have a follow up meeting with the individuals involved after the incident to ensure they have appropriate support and discuss any additional actions that need to put in place to support them
10	Any implications which would mean an additional risk assessment would need to be put in place, complete risk assessment
11	If a safeguarding referral is not required, decided if signposting would be appropriate or any other measures need to be put in place. For example, arranging a meeting with the individuals social

	worker or circle of support
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Process to be followed by **volunteers**:

1	Incident Occurs – an incident is anything that occurs which is out of the ordinary, out of character, or something which may escalate
2	Make situation safe and remove any hazards. Do not put yourself in danger. In an emergency situation contact 999
3	Do not discuss the confidential aspects of the incident with any other member of staff, volunteers or trainees
4	Do not give advice or attempt to mediate following a safeguarding incident.
5	Volunteers must immediately speak the most senior member of staff on site to report incident
6	A volunteer must complete an incident log but may need support from the senior member of staff. Staff must not direct or lead the volunteer when writing their account of the incident
7	A staff member will have a follow up meeting with the volunteer after the incident to ensure the volunteer has appropriate support and discuss any additional actions that need to put in place to support the volunteer

DISCLOSURE

Disclosure is the action of making new or secret information known.

What should you do if you suspect abuse is taking place?

If a person discloses information:

- Stay calm and do not transmit shock, anger or embarrassment;
- Reassure them. Tell them that you are glad that they are speaking to you;
- Never enter a pact of secrecy with the person. Assure them that you will try to help, but let them know you will have to tell other people in order to do this;
- Encourage the person to talk, but do not ask “leading questions” or press them for information, as this could influence what they tell you. Listen and remember;
- Do not make any verbal judgements;
- Check that you have understood correctly what the person is trying to tell you;
- Be aware that the person may try to retract all they have told you; and

- As soon as you can afterwards, make a detailed record of the conversation using the person's own language.

If an incident occurs which appears to be minor you must speak to your line manager to seek further advice.

Process

Examples of incidents which would be categorised as safeguarding incidents and would therefore need to be reported to Adult Social Care.

Any incident of violence which may:

- Be insignificant, minor, or major;
- Be perpetrated towards a trainee, volunteer, member of staff, member of the public, or a visitor;
- Include behaviours like pushing, hitting, spitting.

Any incident of verbal aggression which may:

- Include threats, racism, swearing at an individual;
- Be perpetrated towards a trainee, volunteer, member of staff, member of the public, or a visitor.

Any incidents of sexual behaviour which may:

- Include inappropriate touching of any kind (including to oneself), lewd and suggestive language, threats of sexual violence;
- Be perpetrated towards a trainee, volunteer, member of staff, member of the public, a visitor.

Incidents of this nature must be reported to Adult Social Care at either Leeds City Council or North Yorkshire County Council on the day the incident occurs.

Examples of incidents which would be categorised as incidents which would be reported to Adult Social Care at the Training Manager/CEO's discretion.

Inappropriate conversation or crossing of boundaries, for example:

- trainee asks for your mobile number;
- trainee asks you to go on a date; or
- trainee buys you a present.

Concerns relating to health and wellbeing, for example:

- trainee refuses to eat or drink;
- trainee discloses a medical concern;
- significant or prolonged change in mood of a trainee; or
- trainee has an accident from the bowel or bladder.

PREVENT

Paperworks is committed to providing a secure environment, where everyone feels safe and is kept safe. All adults in Paperworks recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for vulnerable adults or not. In adhering to this policy and procedures staff and visitors will contribute to delivery of the outcomes to all trainees.

This Preventing Extremism and Radicalisation Safeguarding Policy is one element within our overall arrangements to Safeguard and Promote the Welfare of all adults.

When operating this policy we use the following accepted Governmental definition of extremism which is: "Vocal or active opposition to

fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and / or calls for the death of members of our armed forces, whether in this country or overseas". The full Government Prevent Strategy can be viewed at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/preventstrategy-review.pdf

There is no place for extremist views of any kind in our organisation, whether from internal sources – trainees, staff volunteers, trustees – or external sources – the community, external agencies, or individuals. Our trainees see Paperworks as a safe place. As an organisation we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for adults with learning disabilities and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our trainees. We therefore commit to providing a safe and secure work environment, delivered by skilled staff, so that our trainees: are enriched; understand and become tolerant of difference and diversity; thrive and feel valued and not marginalized. We are also aware that adults with learning disabilities can be exposed to extremist

influences or prejudiced views which emanate from a variety of sources and media, including via the internet. Any prejudice, discrimination or extremist views, including derogatory language, displayed by trainees or staff will always be challenged and where appropriate dealt with in line with appropriate policies.

As part of wider safeguarding responsibilities staff will be alert to:

- Disclosures by trainees of their exposure to the extremist actions, views or materials of others outside of Paperworks, such as in their homes or community groups, especially where trainees have not actively sought these out;
- Graffiti symbols, writing or artwork promoting extremist messages or images;
- Trainees accessing extremist material online, including through social networking sites;
- Carers' reports of changes in behaviour, friendship or actions and requests for assistance from partner organisations, local authority services, and police reports of issues;
- Adults voicing opinions drawn from extremist ideologies and narratives;

- Use of extremist or 'hate' terms to exclude others or incite violence;
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.

Paperworks will closely follow any locally-agreed procedure as set out by the Local Authority and / or Safeguarding Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation. In the event of concerns about a person becoming radicalised consideration will be given to using the LA Channel process. Channel is a bespoke panel which meets to address issues of individuals who have been identified as being at risk of radicalisation but have not committed any terrorism offence. The Channel Panel meets when a referral has been made and referrals can be made by anyone.

We will ensure that all of our staff are equipped to recognize extremism and are skilled and confident enough to challenge it. Staff training will take place regarding Safeguarding every 3 years. Therefore all adults working at Paperworks (including visiting staff, volunteers, contractors, and students on placement) are required to report instances where they believe a trainee may be at risk of harm or neglect to the Designated

Safeguarding Lead. In addition the training Manager and CEO will undertake 'Prevent training' to disseminate to the rest of the staff team.

DBS checks are always made at the appropriate level, references are always received and checked and we complete and maintain a single central record of such vetting checks. We will apply safer recruitment best practice principles and sound employment practice in general and in doing so will deny opportunities for inappropriate recruitment or advancement. We will be alert to the possibility that persons may seek to gain positions within our organisation so as to unduly influence the organisation's character and ethos. We are aware that such persons seek to limit the opportunities for our trainees thereby rendering them vulnerable to extremist views and radicalisation as a consequence. Therefore, by adhering to safer recruitment best practice techniques and by ensuring that there is an on-going culture of vigilance within Paperworks and the staff team we will minimise the opportunities for extremist views to prevail.

Date adopted by the Board...1st December 2017.....

Signed by Member of the Board.....

Name (in Capitals please)

To be reviewed.....30th November 2018