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# Safeguarding policy

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Open Spaces  
Department

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Updated 19/7/13

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## Quick Reference for Safeguarding Issues

Are you concerned about a child or vulnerable adult or someone's actions towards a child or vulnerable adult?

**You must report this concern to a Designated Officer or Deputy Designated Officer as soon as possible or by the end of the working day.**

### Burnham Beeches & Stoke Common

**Designated Officer:** Superintendent (Andy Barnard, 0207 332 6676)

**\*Deputy Designated Officer:** Head Ranger (Martin Hartup, 01753 6447358)

### Cemetery & Crematorium

**Designated Officer:** Superintendent (Gary Burks, 0207 332 8831)

**\*Deputy Designated Officer:** Bereavement Services Manager (Kevin Hajduczek, 0208 5309828)

### City Gardens & West Ham Park

**Designated Officer:** Superintendent (Martin Rodman, 0207 332 6610)

**\*Deputy Designated Officer:** City Gardens Manager (Louisa Allen, 0207 374 4140)

### City Commons

**Designated Officer:** Superintendent (Bob Warnock, 0207 332 6620)

**\*Deputy Designated Officer:** Head Ranger (Andrew Thwaites, 01372 279083)

### Epping Forest

**Designated Officer:** Superintendent (Paul Thomson, 020 8532 5300)

**\*Deputy Designated Officer:** Head of Operations (Geoff Sinclair, 020 85321010)

### North London Open Spaces

**Designated Officer:** Superintendent (Simon Lee, 0207 332 3322)

**\*Deputy Designated Officer:** Business Manager (Yvette Hughes, 0207 3323977)

\* Deputy Designated Officers should be contacted when Designated Officers are not available or are implicated in the case. When neither Officer is available at a site, any other Designated Officer can be contacted until an officer is reached.

For more information regarding Designated Officer responsibilities see **Appendix 1 – Information for Designated Officers.**

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## Open Spaces Department Safeguarding Policy

The Open Spaces Department considers the protection of children and vulnerable adults as a very serious matter. As a result, the Director of Open Spaces takes overall strategic responsibility for the safeguarding of children and vulnerable adults visiting the City of London Open Spaces. However, due to the geographically diverse nature of the Open Spaces Department, the responsibility for safeguarding procedures is held at a local level to reduce the barriers of reporting suspected abuse. Each service has a nominated Designated Officer and Deputy Designated Officer listed on Page 1.

This document is intended to set out the Open Spaces approach to safeguarding children and vulnerable adults. In order to do this, the document is focused on two main areas:

- roles and responsibilities of Open Spaces employees in relation to safeguarding;
- reducing the risk of allegations of abuse against staff members;

## Vision Statement

The City of London Open Spaces Department is committed to providing high quality open spaces which are accessible to all. The Director of Open Spaces believes that central to this commitment is the need to provide a safe environment for our visitors when accessing our services, in particular safeguarding children, young people and vulnerable adults.

## Scope of the Policy

This policy applies to all individuals regardless of gender, ethnicity, sexuality, age, disability or religion and includes:

- all staff including; senior managers, full-time staff, seasonal staff, casual or freelance staff
- volunteers
- contractors or consultants
- licensees

The policy aims to protect children, young people and vulnerable adults. This includes all children and young people under the age of 18 and vulnerable adults who are over the age of 18. A vulnerable adult is generally someone;

- Who is, or may be, in need of community services due to age, illness or a mental or physical disability
- Who is, or may be, unable to take care of himself/herself, or unable to protect himself/herself against significant harm or exploitation

*(Definition from the Department of Health 2002)*

A full definition of a vulnerable adult can be found in **Appendix 2 – Definition of Vulnerable Adult**.

Safeguarding encompasses both the protection of individuals from abuse and harm, as well as preventative measures to keeping children and vulnerable adults safe on City of London Open Spaces sites.

## Definition of Safeguarding

Open Spaces recognises the definition of safeguarding used in the Children Act 2004 and the Department for Education (DCSF (now DfE)) guidance document *Working together to safeguard children* (2010, paragraph 1.20), which focuses on safeguarding and promoting children and young people's welfare and can be summarised as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

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## Roles and responsibilities of Open Spaces employees in relation to safeguarding

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### Open Spaces Safeguarding Statement

Open Spaces recognises that it is a fact that child abuse and abuse of vulnerable adults happens and has been happening for many years. Child abuse and abuse of vulnerable adults occurs in many different socio-economic groups and in all cultures.

Under the 1989 Children's Act, The Children Act 2004, and Safeguarding Vulnerable Groups Act 2006 we recognise that the welfare of individual children and vulnerable adults are paramount and that we have a duty to help to protect these individuals with whom we make contact from abuse. We recognise that we are in a position that often times affords us certain privileges to observe and report cause of concern.

We recognise that there has to be a multi-agency and disciplinary approach to the welfare of children and vulnerable adults, and realise the importance of liaising and co-operating with the police and social services to endeavour to protect these individuals.

[http://www.cityoflondon.gov.uk/Corporation/LGNL\\_Services/Health\\_and\\_social\\_care/Childrens\\_social\\_care/safeguarding\\_children.htm](http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Health_and_social_care/Childrens_social_care/safeguarding_children.htm)

Staff members are to be made aware of the procedures for reporting issue of suspected child or vulnerable adult abuse and be also aware of the back up support of the local Child Protection Committee. We recognise that abuse can come in various forms but there are four main categories. These are:

- **Physical abuse:** Any form of non-accidental injury that is deliberately inflicted. These are likely to cause long term problems such as scars, internal injuries, brain damage, and emotional impacts.
- **Sexual abuse:** Taking advantage of a child for the sexual gratification of an adult. Possible long term effects include having difficulties in later life in forging trusting and stable personal relationships.
- **Emotional abuse:** The persistent lack of affection and physical interaction with a child which can lead to a child becoming nervous withdrawn, lacking in confidence and self-esteem.
- **Neglect:** The persistent or severe failure to meet a child's basic needs which can lead to health problems

We recognise that legal frameworks change often and that the issue of child and vulnerable adult abuse forces everyone to deal with their own feelings and emotions, which can include concern, shame, impotence, fear, anger and repulsion. With this in mind we will provide appropriate training for staff on safeguarding issues as well as regular refresher courses (See **Appendix 3 – Training Provision Matrix**).

## Responsibilities

- All staff to be aware of the policy and report cases of suspected abuse of children or vulnerable adults.
- The Designated Officers and Supervisors of child-focused facilities (see **Appendix 4 – Child-focused facilities**) will monitor safeguarding procedures on Open Spaces sites.
- The Community Education Officer at North London Open Spaces will review the safeguarding policy annually and report changes to the Designated Officers and the Senior Management Team.
- The Designated Officers will lead on safeguarding issues; and promote the importance of safeguarding to staff, volunteers and contractors.
- The Deputy Designated Officers will ensure that safeguarding is incorporated into operational issues.
- The Designated Officer and Deputy Designated Officer will undertake the appropriate level of safeguarding training and receive a refresher training session every 3 years.
- The Supervisors of child-focused facilities will lead on local safeguarding arrangements such as staff training, escalating disclosures appropriately and implementing the relevant policies.
- The HR department will ensure that the necessary training for staff working with safeguarding responsibilities is identified and provided (see **Appendix 3 – Training Provision Matrix**).
- The HR department will ensure that Safer Recruitment Policies, including Disclosure & Barring Services (DBS) checks, are adhered to during recruitment and selection of staff working with children and vulnerable adults.

## Monitoring

The Safeguarding Policy for the City of London Open Spaces will be reviewed annually by the Community Education Officer at North London Open Spaces to ensure that any changes in legislation or best practice are captured and updated.

Monitoring of safeguarding issues, concerns, reports and allegations will be conducted by all Safeguarding Officers as and when appropriate. City of London Open Spaces are committed to safeguarding at all levels of the organisation. Safeguarding will be included in the appropriate PDR processes where applicable. Safeguarding will be included in the relevant reports to Management Committees.

## **Confidentiality**

All allegations, records of concern and disclosures are confidential and subject to our Data Protection Policy. Staff should not discuss any information relating to a case or allegation with the accused or officers not involved in the case.



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## Reducing risks to children, young and vulnerable people

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The following procedures should be followed by all members of staff across the Open Spaces Department to promote a safe environment for all children, young and vulnerable people accessing our services and involved in the work of the Open Spaces, for example through volunteering. These procedures are considered the normal operating procedures and should not hinder action in an emergency situation. When an emergency situation arises, the staff member should conduct a dynamic risk assessment of the situation and respond accordingly.

1. **Avoid being alone with a child or vulnerable adult.** Ensure that you always have another staff member present when working with children or vulnerable adults. When this is not possible immediately, contact another member of staff to join you as soon as possible. This includes:
  - a. Carrying out intimate tasks with children and vulnerable adults (e.g. first aid that involves lifting/removing a child clothes to assess injury) in the presence of another staff and away from the public.
  - b. Keeping a record of your actions and movements, especially after incidents when you had to make physical contact with a child or vulnerable adult (e.g. to protect themselves from hurting themselves or harming others).
  - c. Not taking children or vulnerable adults into the lavatory. If it is necessary to enter an occupied lavatory only do so with another responsible adult (e.g. after emergency alarm has been pulled).
  - d. In the case of a Missing Person, it may be necessary to be alone with a child or vulnerable adult. Immediately contact another member of staff to join you and move into a visible area with other responsible adults if possible.
  
2. **Avoid physical contact with a child or vulnerable adult.** Some physical contact is appropriate when comforting a child, such as holding a hand or patting a shoulder, but should only be done in the presence of another staff member. Ensure that a child has consented to physical contact. This includes:
  - a. Being careful in how you approach children or vulnerable adults. Do not touch or pick up a child who does not want to be touched or picked up, unless it is to protect them from harm or prevent them from harming others.
  - b. Managing children's challenging behaviour should never involve handling a child roughly (e.g. pulling a child by the arm).
  - c. Physical contact from children or vulnerable adults that worry you should be reported to your supervisor, as well as any other incidents that make you feel uncomfortable.

- 3. Always use appropriate language in front of children or vulnerable adults (See Appendix 5 - Appropriate and Inappropriate Language).**
  - a. Do not shout at or use a sarcastic or aggressive approach with children or vulnerable adults. (Shouting to a child a distance from you to get their attention, e.g. if they are doing something untoward, is acceptable as long as this is followed by approaching the child).
  - b. Do not make sexually suggestive comments within earshot of a child or vulnerable adult.
  
- 4. Manage the relationship professionally.** During the course of your work, you will develop relationships with various individual children or vulnerable adults. It is important that you manage these relationships professionally. This includes:
  - a. Not asking a child or vulnerable adult to keep secrets.
  - b. Not showing favouritism or spending too long with one child or vulnerable adult, unless it is following an observation or this has been discussed and approved with your supervisor (e.g. some children may be experiencing difficulties and might need extra attention or individual work placements).
  - c. Unless in place before starting work, not arranging to see children or vulnerable adults, or their families outside work nor agreeing to any child minding arrangements.
  - d. Not showing children or vulnerable adults sexually suggestive images.
  - e. Not allowing children or vulnerable adults into staff buildings or private locations such as bothies.
  
- 5. Always report suspicious behaviour or disclosures of abuse.** If a child or vulnerable adult discloses any information which you feel is a safeguarding issue, report this to a Designated Officer as soon as possible or by the end of the working day.

Please note that this list is to be used as guidance only and is not meant to be definitive. If you have any further concerns or issues please raise these with a Designated Officer.

## Written records of concern

In most cases, written records of concern will be completed by the Designated Officer when a staff member reports suspected abuse, a disclosure or an allegation (see **Appendix 6 – Record of Concern** for template). However, in child-focused facilities, written records of concern should also be completed by staff when a potential sign of abuse is observed, even if there is no need to make an immediate referral. For example, a child may exhibit a sign of neglect such as unwashed clothing or withdrawn behaviour which in isolated instances would not give rise to a concern. However, an accumulation or pattern of signs over a number of months would give rise to a concern which must be reported to the Designated Officer.

These records of concern will be filed in a locked cabinet by the facility supervisor. The supervisor will review the records of concern regularly to find patterns of concern which may indicate abuse or neglect and report these accordingly. After 1 year, the records will be transferred to the Superintendent's Office.

Written records of concern are considered sensitive information and are therefore subject to the City of London's data protection policy. The records of concern should be kept until the child's 25<sup>th</sup> birthday, in line with best practice standards.

## Special Circumstances

### Lodges in Open Spaces

Open Spaces provides residential accommodation to some of its employees. At times, other members of staff may be required to enter these properties for maintenance or other purposes. Children or vulnerable adults under a staff member's care living at these properties fall under the safeguarding policy. In these instances the following measures should be taken:

- Ensure that the residential staff member is aware of the requirement to enter the property.
- When a child or vulnerable adult is due to be in the property, it is the parent's responsibility to ensure that the child or vulnerable adult is not alone with a staff member or contractor.
- Any instance of abuse or neglect of children or vulnerable adults witnessed within the property by a staff member must be reported to the Designated Officer.

### Working with Schools or Community Organisations

Open Spaces regularly works with schools and community organisations to deliver its services. During these interactions, abuse or neglect of children or vulnerable adults may be witnessed or disclosed to a member of Open Spaces staff. Where the school or group has in *loco parentis* responsibility for the children, Open Spaces will follow the safeguarding procedures of the school or community organisation. If the Designated Officers are not satisfied with the school or community organisation procedures or response, they will refer the case to the appropriate local borough or county council safeguarding team.

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## Appendix 1 – Information for Designated Officers

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- If a case of abuse or suspected abuse is reported to a Designated Officer a written record of concern should be completed immediately by the Designated Officer.
- The Designated Officer or Deputy Designated Officer should inform the Local Authority Designated Officer (LADO) for the Borough or Council in which the child lives, or police if concerns of immediate safety are suspected.
- In the case of an allegation against a staff member, the Designated Officer or Deputy Designated Officer will inform the City of London safeguarding officers who will liaise with the local authorities involved.

### Related policies

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#### Related Policies and Procedures

Health & Safety Policy

Communication & Information Systems Use

Data Protection Policy

Recruitment and Selection Policy

Employment Screening Policy

Code of Conduct for Officers

Disciplinary Procedure

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### Borough or Council Safeguarding Teams

All London Boroughs and County Councils have Safeguarding Teams which will help with suspected cases of abuse. Please refer to them when you are unsure how to proceed or are concerned about a child or vulnerable adult.

London contacts can be found here: <http://www.londonscb.gov.uk/contacts>

Contacts outside of London can be found by accessing the local Council's website.

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## Appendix 2 – Definition of Vulnerable Adult

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A person is a vulnerable adult if he has attained the age of 18 and:

- is in residential accommodation
- is in sheltered housing
- receives domiciliary care
- receives any form of health care
- is detained in lawful custody
- requires assistance in the conduct of his own affairs.
- payments are made to him (or to another on his behalf) in pursuance of arrangements under section 57 of the Health and Social Care Act 2001 (c. 15)
- is by virtue of an order of a court under supervision by a person exercising functions for the purposes of Part 1 of the Criminal Justice and Court Services Act 2000 (c. 43)
- receives any service or participates in any activity provided specifically for persons who has particular needs because of his age, has any form of disability, has a physical or mental problem of such description as is prescribed, she is an expectant or nursing mother in receipt of residential accommodation pursuant to arrangements made under section 21(1)(aa) of the National Assistance Act 1948 or care pursuant to paragraph 1 of Schedule 8 to the National Health Service Act 1977 (c. 49)
- receives a welfare service of a prescribed description. Welfare services includes services which provide support, assistance, advice or counseling to individuals with particular needs

*From the Disclosure and Barring Service*

## Appendix 3 – Training Provision Matrix

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## Appendix 4 – Child-focused Facilities

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The City of London Open Spaces operate a number of facilities and services which are focused on children including:

- The Hampstead Heath Education Centre
- The Hampstead Heath Adventure Playground
- The Hampstead Heath Traditional Playground
- The Hampstead Heath One O’Clock Club and Peggy Jay Centre
- The Hampstead Heath Lido
- The Queen Elizabeth Hunting Lodge
- The View – Epping Forest
- West Ham Children’s Playground and paddling pool
- West Ham Park Jubilee Food Garden
- West Ham Park Wildlife Education Garden

## Appendix 5 – Appropriate and Inappropriate Language and Behaviour

It is essential to use appropriate language and behaviour when communicating and interacting with children and vulnerable adults to ensure your own welfare and theirs. 'Appropriate' is a value-laden word and can mean different things to different individuals. Within the context of this document, some language or behaviour has been outlined explicitly as inappropriate such as the use of sexually suggestive language. Other language or behaviour can be more subjective such as using a raised voice. The following is a guide for some more regular situations that may arise in your day-to-day operations.

Situation	Appropriate behaviour / language	Inappropriate behaviour / language
<b>A child/vulnerable adult is endangering himself/herself or another person</b>	<p>Use a raised, firm voice to tell the individual to stop the action immediately, especially if at a distance.</p> <p>Only make physical contact with the child if required to keep them safe.</p> <p>When calm and safe, approach the individual and discuss the incident with them and explain why you needed to take action you did.</p> <p>When with individual is with an accompanying adult, explain your actions to the adult as well.</p>	<p>Walk away without discussing the incident calmly with the individual or accompanying adult.</p> <p>Yell at an individual after the incident or be angry with the individual.</p>
<b>The actions of a child/vulnerable adult are prohibited, but do not pose a threat to themselves or other people</b>	<p>Always approach the accompanying adult first, explain the rules that the individual is breaking and why the rule exists, and ask them to intervene.</p> <p>When the individual is not with an adult, calmly approach the individual and ask them to stop their actions. Explain the consequences of their actions and why they need to stop.</p> <p>If the individual does not stop the action, you may ask them to leave the facility.</p>	<p>Do not yell at the individual or accompanying adult.</p> <p>Do not make physical contact with the individual or accompanying adult.</p> <p>Do not threaten the individual or accompanying adult with expulsion from the facility immediately.</p>
<b>A child/vulnerable adult makes an inappropriate remark about you (such as profanity or name calling)</b>	<p>Approach the accompanying adult and explain the situation to them and how it is unacceptable. Ask them to intervene and speak with the individual.</p> <p>When the individual is not with an adult, remain calm and explain that the remark was inappropriate.</p> <p>If you feel threatened by the individual, you may ask them to leave the facility</p>	<p>Do not yell at the individual or accompanying adult.</p> <p>Do not make physical contact with the individual or accompanying adult.</p> <p>Do not retaliate and use profanities towards the individual.</p> <p>Do not use sarcastic remarks towards the individual.</p>



## Appendix 6 – Record of Concern

Location / Team / Division:
To be completed by Designated Officer
Subject's Name:
Date of Birth:
Address:
Nature of concern:
Reported by (name & position):
Date reported:
Signature of Designated Officer:
Shared with others?                      YES   /   NO
If yes, with whom:
Action taken:
Concern logged with relevant Child Protection team? YES / NO
Concern logged with CoL child protection?                      YES   /   NO

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## Appendix 7 – Handling disclosures

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If you become aware or are concerned that a child or vulnerable person is being sexually, physically, or emotionally abused or neglected, or if a child or vulnerable person discloses a case of abuse to you, you should:

- Stay calm and listen carefully to the individual.
- Take accurate notes and try to describe the incident in the words of the individual. Note the time, date, place and any questions you asked as well as the name of the child and their address.
- Do not ask leading questions or attempt to investigate the incident. Remember that allegations of abuse may be investigated as a criminal offence and any investigations done by individuals may jeopardise this process.
- Do not promise confidentiality. Be clear that you will be sharing this information with your Designated Officer and safeguarding contacts.
- Use appropriate language and reassure the individual that they have done the right thing.
- Immediately contact your Designated Officer who will manage the recording of the disclosure and the appropriate reporting.

Staff should not investigate concerns of abuse but report them to the Designated Officer as soon as possible or by the end of the working day. The Designated Officer will liaise with the appropriate organisations to refer the concern of abuse. The Designated Officer will provide information regarding the outcome of the disclosure to the staff member at an appropriate later date.

Generally, staff other than the Designated Officer should not make referrals. However, in the case that the Designated Officer chooses not to disclose the concern to the relevant local borough or county council and the staff member believes the referral should be made, the staff member can report this to the Director of Open Spaces.

### Appropriate language when handling a disclosure

Disclosures of abuse can be very emotional and difficult for both the child or vulnerable adult, and the staff member handling the disclosure. The following statements provide a guide for the type of language to be used during this process.

- You've done the right thing by telling me this.
- I'm very worried about your safety. I can't keep this a secret because I'm worried about you. I'm going to be telling my manager what you've told me.
- You haven't done anything wrong and this isn't your fault.

- I know this was very hard for you to tell me but you were right to. You are very brave.
- I'm going to do my best to help you, which means I'm going to have to tell my manager so we can get you the right type of help.
- I believe you and I'm going to try to help you.
- I'm glad you told me this.

## Do's and don'ts in a disclosure

The member of staff should:

- Listen to the child or vulnerable adult, keeping calm and offering reassurance.
- Observe visible bruises and marks but not ask a child or vulnerable adult to remove or adjust their clothing to observe them.
- Allow the child or vulnerable adult to lead the discussion and to talk freely if a disclosure is made.
- Listen to the child or vulnerable adult without investigating.
- Avoid using questions such as 'Is there anything else you'd like to tell me?'
- Accept what the child or vulnerable adult says without challenge.
- Reassure them that they are doing the right thing in telling and that they recognise how hard it is for them to tell.

They should not:

- Press for details by asking questions such as 'What did they do next?'
- Lay blame or criticise either the child or the perpetrator.
- Ask the child or vulnerable adult to repeat what they said to a colleague.
- Promise confidentiality – but they should explain that the child or vulnerable adult has done the right thing and who will need to be told and why.

(from [www.teachingexpertise.com](http://www.teachingexpertise.com))