



ACC NHS STAFF COUNSELLING SERVICE

Safeguarding Policy

ACC Safeguarding Policy and Child Protection

1 Introduction

- 1.1 This policy provides details of how the Association of Christian Counsellors (**ACC**) aims to establish and maintain an environment where Counsellors operating in conjunction with ACC's NHS COVID-19 STAFF COUNSELLING SERVICE (the **Service**) are aware of the need for children and vulnerable adults to be kept safe and secure during the COVID-19 crisis situation.
- 1.2 ACC recognises its' responsibility to promote the welfare of all children and vulnerable adults and is committed to operating the Service in a way that ensures that all children and vulnerable adults who come to the notice of the ACC through the Service are safe and protected.
- 1.3 This policy is based on the legislation and Guidance included at Appendix 1 pursuant to which ACC recognises the following duties:
 - to ensure arrangements are in place for safeguarding and promoting the welfare of children and vulnerable adults.
 - to have due regard to the need to prevent people from being drawn into terrorism ("The Prevent Duty") under the Counter Terrorism and Security Act 2015.
 - to work together with other organisations and partners in order to achieve this in accordance with the Children Act 1989; and
 - to comply with the Common Law duty to protect and keep children and vulnerable adults safe.
- 1.4 ACC recognises that the welfare of each child and vulnerable adult is paramount and that all children and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse.
- 1.5 ACC also recognises that some children and vulnerable adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- 1.6 This policy applies to all staff, trustees, Counsellors and Volunteers and any person working on behalf of, or in any way representing the interests of ACC in connection with the Service.
- 1.7 This policy should be read in conjunction with the NSPCC guidance '*Children at Possible Risk of Abuse*' included at Appendix 3, together with, where necessary, the legislation listed at Appendix 1 and the Government

guidance documents listed at clause 11 below '*Taking matters of concern or disclosures of abuse forwards after they have been reported*'.

1.8 The purpose of this policy is to:

- make all Counsellors and Volunteers aware of what abuse is and how to spot it.
- protect children and vulnerable adults who come to the notice of ACC as a result of a Counsellor engaging with a client in the course of their work for the Service.
- ensure that ACC operates within the legislative framework and recommended guidance on safeguarding.
- provide guidance to Counsellors when deciding whether to take further action about a specific concern; and
- provide all staff, trustees, Counsellors and Volunteers with details of the principles and procedures that they must follow in order to comply with the ACC's policy on safeguarding when working in connection with the Service.

1.9 This policy has been implemented strictly as a response to the COVID-19 situation and will operate only for the duration of the Service

2. Definitions

2.1 For the purposes of this policy, "Safeguarding" is as defined in '*Working together to safeguard children, 2018*' and includes:

- protecting children and vulnerable adults from maltreatment.
- preventing impairment of children's health and development and that of any vulnerable adults.
- ensuring that children and vulnerable adults grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children and vulnerable adults to have the best outcomes.

2.2 Designated Safeguarding Officer (the **DSO**) is the person responsible for handling any Safeguarding matters on behalf of the ACC.

2.3 Safeguarding Report Form (the **SRF**) refers to the ACC's Safeguarding Report Form, a pro-forma of which is included at Appendix 2 of this document.

2.4 Counsellor (a **Counsellor**) refers to any Counsellor offering their services in connection with ACC's Crisis Counselling Support Service.

- 2.5 Volunteer (a **Volunteer**) refers to any additional member of staff who has offered their services in connection with the delivery of the ACC's NHS STAFF COUNSELLING SERVICE.

3. The Designated Safeguarding Officers

The ACC recognises that Safeguarding is everyone's responsibility, however, the Lead DSO for the ACC is Kathy Spooner the Deputy DSO, appointed to act in the absence/unavailability of the lead DSO is Sue Monckton-Rickett. In addition, the Lead Trustee DSO is Fiona Sherburn.

4. Safeguarding Policy

It is the role of the Lead DSO or, in their absence, the Deputy DSO together with the Lead Trustee DSO to:

- develop and implement procedures for identifying and reporting cases, or suspected cases of abuse.
- ensure that all staff, Counsellors and Volunteers who work in connection with the Service on behalf of ACC are aware of and have access to the ACC's NHS Staff Counselling Service Safeguarding Policy.
- ensure that any safeguarding allegation that is made by a Counsellor in connection with their work for the Service, is dealt with in accordance with the principles set out in this policy.
- where requested, attend any conferences or inter-agency meetings in connection with a safeguarding allegation that is made pursuant to this policy.
- where requested, submit any reports that may be needed in connection with any safeguarding allegation made pursuant to this policy.

5. The Role of the Trustees

- 5.1 The Trustees have overall responsibility for ensuring that there are sufficient safeguarding measures in place within ACC.

- 5.2 In particular the Trustees must ensure that:

- ACC appoints a Lead DSO and Deputy DSO at all times.
 - any safeguarding allegation is managed effectively and safely.
 - any deficiencies and weaknesses in safeguarding arrangements are remedied without delay.
- and

- in the event that the Service extends beyond the initial crisis period, the ACC's Safeguarding Policy and safeguarding procedures are reviewed and kept up to date in accordance with relevant legislation.
- 5.3 Further guidance for trustees is available on the Charity Commission's website Safeguarding and Protecting People for Charities and Trustees <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees> and the safeguarding infographic trustee actions document https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756636/10_safeguarding_actions_for_charity_trustees_infographic.pdf

6. Safeguarding Procedure

- 6.1 If any Counsellor or Volunteer working in connection with the Service is concerned about a child or vulnerable adult, he or she must follow the ACC's safeguarding procedure as set out below:
- if possible, and to do so would not put the client or any member of the client's family at risk of further harm, the Counsellor should endeavour to discuss their concerns with either the Lead or Deputy DSO or the Lead Trustee DSO and their clinical supervisor.
 - where a safeguarding referral is felt necessary either by the Counsellor acting alone or following discussion with ACC and their clinical supervisor, the Counsellor should discuss their intention to report the concern with the client (unless to do so would, in the Counsellors opinion, put the client or a member of their family at further risk of harm).
 - where possible, the Counsellor should endeavour to engage the client's agreement to a safeguarding referral being made by the Counsellor on their behalf (please note, as the safeguarding referral is being made in the context of a professional relationship, Social Services are obliged to inform the client of the identity of the referring Counsellor).
 - if a client refuses consent for the Counsellor to make a safeguarding referral and the Counsellor has legitimate concerns about the welfare of either the client, a member of the client's family or a third party as referred to by the client, the Counsellor should notify the relevant department within Social Services of their concern as soon as possible.
 - the Counsellor should endeavour to record any concerns of a safeguarding nature on a Safeguarding Report Form (Appendix 2) as soon as practicable.
 - if not already done so, the Counsellor should inform the ACC Lead DSO or Deputy DSO of any concerns and action taken as soon as possible.

- the Counsellor should ensure that a copy of the SRF is given to the ACC Lead DSO or Deputy DSO as soon as possible.

6.2 All SRF reports must be logged in a clear and precise manner, giving a full and factual account of any statements or disclosures.

6.3 In circumstances where the Counsellor or Volunteer is concerned for the immediate welfare of a client or a member of the client's family, the Counsellor or Volunteer must follow the procedure set out at clause 8 below.

7. When to be concerned

7.1 All Counsellors and Volunteers should be concerned about a child or vulnerable adult if a client reports any behaviours that suggest evidence of an abusive relationship. These include, but are not limited to indication that a child/vulnerable adult:

- appears frightened of a household member e.g. parent, step-parent, sibling.
- acts in a way that is inappropriate to her/his age and development.
- displays defensive behaviours such as 'frozen watchfulness' or overt aggression towards another family member.

7.2 Appendix 3 below '*Children at Possible Risk of Abuse*' sets out more information to help identify when a child/vulnerable adult may be at risk of abuse/safeguarding issues.

7.3 Further guidance for safeguarding children is available in the NSPCC website standards <https://learning.nspcc.org.uk/research-resources/2017/nspcc-safeguarding-standards-and-guidance-england/> and resources <https://learning.nspcc.org.uk/safeguarding-child-protection/> <https://learning.nspcc.org.uk/safeguarding-child-protection/>

8. Responding to a Direct Disclosure of Abuse

If a client makes a direct disclosure that he or she has been abused in some way, or is concerned for the welfare of a member of their family, the Counsellor or Volunteer should:

- listen to what is being said without displaying shock or disbelief
- accept what is being said
- allow the client to talk freely following the TED rules – tell me, explain to me, describe to me
- reassure the client, but not make promises which might not be possible to keep

- not promise confidentiality – it may be necessary to refer the matter to Social Care
- reassure him or her that what has happened is not his or her fault
- stress that it was the right thing to tell
- not ask direct or leading questions
- not criticise the alleged perpetrator
- if appropriate, give the client the phone number for Childline – 0800 1111
- ensure that the client and any family member is currently safe, and
- explain what has to be done next and who has to be told.

9. Helping a client/family member in immediate danger

- 9.1 If a client or a member of their family is in immediate danger, the Counsellor or Volunteer must contact the police and explain the situation to them. The police should be contacted on either 999 if there is immediate danger or 101 if the danger is imminent but not immediate.
- 9.2 If a client or a member of their family needs emergency medical attention, the Counsellor or Volunteer must call an ambulance (999) and, whilst waiting for the ambulance to arrive, do their best to help and support the client.
- 9.3 Counsellors or Volunteers must report the incident as soon as practicable following the protocol set out in clause 5 of this document.

10. Record keeping in the case of direct disclosures of abuse or safeguarding concerns

- 10.1 When a client has made a direct safeguarding disclosure, the Counsellor or Volunteer should:
 - make brief notes as soon as possible during or immediately after the conversation
 - attach the original notes to the SRF to be submitted to the DSO (original notes should not be destroyed in case they are needed in court)
 - record the date, time, place of the allegation
 - if possible, draw a simple diagram to indicate the position of any reported bruising or other injury
 - record direct statements rather than interpretations or assumptions.
- 10.2 All records need to be given to the Lead DSO/Deputy DSO promptly, together with the requisite SRF.

- 10.3 No copies of any documentation relating to a Safeguarding incident should be retained by the Counsellor or Volunteer.

11. Confidentiality

- 11.1 Safeguarding concerns raise issues of confidentiality that must be clearly understood by all ACC Counsellors and Volunteers.
- 11.2 Where necessary, all Counsellors, staff, trustees and Volunteers have a responsibility to share relevant information about the protection of children and vulnerable adults with other professionals, particularly the investigative agencies.
- 11.3 If a client confides in a Counsellor or Volunteer and requests that the information is kept a secret, it is important that the Counsellor or Volunteer tell the client that they cannot promise complete confidentiality. Instead, they must explain that they may need to pass the information on to other professionals in order to help keep the client or any family member safe.
- 11.4 Counsellors or Volunteers who receive information about a child or vulnerable adult in the course of their work with the ACC, should only share that information within appropriate professional contexts.
- 11.5 In all other contexts, the confidentiality of the matter must be respected at all times, by all parties.
- 11.6 All safeguarding allegations should be dealt with in accordance with the 7 golden rules contained in the Government's guidance 'Information Sharing – Advice for Practitioners 2018.'
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

12. Taking matters of concern or disclosures of abuse forward after they have been reported

- 12.1 Where the Lead or Deputy DSO or the Lead Trustee DSO are made aware of either a safeguarding concern or a disclosure of abuse, they must ensure that the Counsellors has:
- complied with the guidance set out in the Government guidance documents listed below.
 - contacted the relevant reporting agency as set out at Appendix 4 – Useful Contacts – in order to ensure that the client and any family

member is kept safe and that matters are dealt with swiftly and efficiently with minimum disruption to the wellbeing of any person concerned.

12.2 Where necessary, the Lead or Deputy DSO or the Lead Trustee DSO must seek clarification and advice from the Police and/or Social Services in order to ensure that the Counsellor or Volunteer has carried out their obligations in accordance with this policy.

12.3 For the purposes of this document, Government guidance documents include:

- *What to do if you're worried a child is being abused - Advice for practitioners* <https://education.gov.uk/publications>
- *LSCB Information Sharing, Chapter 10 of LSCB procedures online - Advice for practitioners providing safeguarding services to children, young people, parents and carers* <https://www.proceduresonline.com/bedford>
- *Working Together to Safeguard Children - A guide to inter-agency working to safeguard and promote the welfare of children (2018)* <https://publications.dcsf.gov.uk>

13. Self-care

Dealing with a safeguarding issue or a direct disclosure from a client can be a stressful experience. Any Counsellor, Volunteer, trustee or member of staff who feels that they have been affected by a disclosure should consider seeking support for him/herself and arrange a time to discuss this with an ACC DSO.

14. Allegations involving Charity staff, trustees or Volunteers - Whistleblowing Procedure

14.1 Whenever it is alleged that a Counsellor or Volunteer has, whether in the context of their work with ACC or elsewhere:

- behaved in a way that has or may have harmed a child or vulnerable adult.
- committed a criminal offence against a child or vulnerable adult.
- abused a child or vulnerable adult; or
- behaved towards a child or vulnerable adult in a way which indicates that he/she is unsuitable to work with ACC clients

the person receiving that allegation must take it seriously and immediately carry out the following:

- make a written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, what was said and anyone else present
- sign and date the record
- ensure that the record is immediately passed on to the Lead DSO or Deputy DSO
- fully inform the Lead DSO or Deputy DSO of the nature of the allegation
- observe full confidentiality in all aspects concerning the allegation.

14.2 It is the responsibility of the Lead DSO or Deputy DSO to discuss the matter at the earliest opportunity with the Lead Trustee DSO.

14.3 The Trustees will ensure that all Counsellors and Volunteers are made aware of ACC's Whistleblowing Procedure as set out above.

14.4 Any Counsellor or Volunteer subject to such allegations will be immediately suspended from any role within the Service, pending a full investigation by their professional body. Should they be found guilty of any misconduct, they will be immediately removed from post and barred from any further engagement with the ACC or its Service.

This Safeguarding Policy is reviewed and, where necessary, updated annually.

Date of policy: 1 February 2021; Reviewed on 31 May 2022; Next review due on 31 May 2023

Signed: Lead DSO



Kathy Spooner

Signed: Chair of Trustees



Sue Monckton-Rickett

Appendix 1

Legal Framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children and vulnerable adults, namely:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Human Rights Act 1998
- Data Protection Act 2018
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Mandatory Reporting of Female Genital Mutilation Guidance
- Counter Terrorism and Security Act 2015
- Special Educational Needs and Disability (SEND) code of practice 0-25years
– Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers: HM Government 2018
- Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children 2018.
- Safeguarding Adults NHS England Guide
<https://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf>
- Safeguarding Adults Legislation – Anna Craft Trust
- <https://www.anncrafttrust.org/resources/safeguarding-adults-legislation/>

Appendix 2

Pro-forma Safeguarding Report Form (SRF)

ACC's NHS STAFF COUNSELLING SERVICE	
Safeguarding Report Form	
Name of client:	
Age:	Gender:
Referred to Service by:	
Date and time of concern/disclosure:	
Name of Counsellor to whom disclosure made (please print):	
Details of safeguarding concern/allegation of abuse (delete as necessary):	
Details of action taken by reporting Counsellor (please use a separate sheet of paper if necessary)	

Copy of completed form given to ACC: YES/NO

Date:

By: (insert name)

Signature:

Date:

Copy of completed form received by ACC: YES/NO

Date:

By: (insert name)

Signature:

Date:

Any further action required by ACC?

Safeguarding Report Form completed by (insert name)

Signed:

Date:

Appendix 3

Children at Possible Risk of Abuse

Set out below are guidelines issued by the NSPCC to help identify, and, where necessary, respond to, matters of safeguarding concern and abuse. All Charity staff, trustees and Volunteers should be aware of the matters outlined in this guidance, which should be read in conjunction with the ACC's policy on Safeguarding and Child Protection.

Different types of abuse

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or children to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking

at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Radicalisation

The Prevent Duty is the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. Radicalisation is a process by which an individual comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or undermine contemporary ideas and expressions of the nation. It can happen when a young person becomes influenced by someone they have met or if they have been exposed to propaganda. Warning signs could be that a young person might hold a strong conviction that their religion, culture or beliefs are under threat and that they are being treated unjustly. In addition, they may indicate that they believe conspiracy theories and distrust mainstream media or may have joined a group in which they have previously shown no interest. Other indicators may be that they are secretive about whom they have been talking to online and which websites they visit and/or that they are emotionally volatile when discussing issues of religion, culture or beliefs.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of material substance abuse. Once a child is born it may involve a parent or carer failing to provide adequate food, clothing, and shelter, including exclusion from home or abandonment and failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Other types of abuse

There are also emerging types and methods of child abuse, including:

- Sexual exploitation
- Female genital mutilation (FGM)
- Trafficking of children in order to exploit them sexually, financially, via domestic servitude, or via the involvement in activity such as the production and sale of illegal drugs
- Abuse linked to beliefs such as spirit possession or witchcraft

- Domestic violence (either witnessing violence between adult family members, or, in the case of older young people, being subjected to coercion or violence in an intimate relationship in the same way as an older person).

It should be remembered that abuse is not always obvious, and there are many reasons why children may not tell anyone that they are being abused. They might not even realise that what is happening to them is abusive.

It should also be remembered that any of the signs that suggest that abuse is occurring may also be caused by other issues. It is often the case, therefore, that investigating agencies need to build up a picture of a child's life by piecing together information held by different individuals and organisations.

It is also important to point out that children and young people can experience various types of abuse at the same time. For example, all abuse involves an element of emotional abuse, and neglect often occurs in contexts where children are also being subjected to physical or sexual abuse.

In terms of specific signs and indicators, sometimes there are physical signs such as:

- unexplained bruises, other injuries or health problems
- unexplained gifts or additional mobile devices
- poor appearance or hygiene
- recurring health problems that are not treated
- young children not meeting their developmental milestones (particularly if there is no disability)
- being left alone
- an unsuitable home environment eg cold, dirty, physically unsafe
- pregnancy, sexually transmitted infections or anal/vaginal soreness
- any signs that a child/young person is a risk of being subjected to forced marriage or Female Genital Mutilation

A child's behaviour can also help to indicate that they are being abused. It can be helpful to be aware of behaviour that you might normally associate with an older or younger child. In particular, the following signs may indicate that a child is unsettled or unhappy:

- withdrawn
- suddenly behave differently
- anxious
- clingy

- depressed
- aggressive
- problems sleeping
- eating disorders
- wets the bed
- soils clothes
- takes risks
- misses school
- changes in eating habits
- obsessive behaviour
- nightmares
- drugs
- alcohol
- self harm
- thoughts of suicide

Ways that abuse might be brought to your attention

- a direct disclosure by the child about him/herself or about another child
- the offer of information that is worrying but not a direct disclosure
- other people may have observed behaviour by a child that is worrying or have concerns about a child's appearance, or the treatment of that child by a parent/carer
- a disclosure by a parent or carer about abuse that a child is suffering or is at risk of suffering
- the offer of information by other people about a child that is worrying but not a direct disclosure

Appendix 4

Useful contacts

Thirty One Eight, Independent Christian Safeguarding Charity

<http://thirtyoneeight.org>

Local police: 999 (press 55 if unable to speak but need help) or 101 for non-emergency calls

NSPCC Helpline: 0808 800 5000 or help@nspcc.org.uk

Childline: 0800 1111 (textphone 0800 400 222) or www.childline.org.uk