

SAFEGUARDING OF VULNERABLE ADULTS AND CHILDREN POLICY AND CODE OF PRACTICE

Introduction

JLA Limited (and its group companies) makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.

Employees (and Subcontractors working for JLA) may come into contact with children and vulnerable adults through the provision of services in respect of the following type of activities:

- **Emergency Call Outs.** This includes contracts for works such as: reactive maintenance, emergencies (e.g. commercial catering and laundry equipment electrical / mechanical / gas repairs), i.e. where JLA's visit is unplanned and would normally be undertaking works over a period of hours involving a single or small number of workers.
- **Routine Service Visits.** This includes service contracts for: commercial catering and laundry equipment maintenance and equipment installation works, i.e. where usually the contractor's visit is planned and will be undertaking works over a period of hours or a couple of days involving a single or only a small number of workers.

The types of contact with children and / or vulnerable adults will be:

- **Potentially Regulated,** i.e. Regulated activity can be defined as 'frequent contact' with a vulnerable person (once a month or more) or as 'intensive contact' (3 days or more within a 30 day period).

This policy seeks to ensure that JLA Limited undertakes its responsibilities with regard to protection of children and / or vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support employees and subcontractors in their practices and clarifies the organisation's expectations.

Definitions

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible.

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture. It can take a number of forms, including the following:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying
- Neglect
- Financial (or material) abuse

DEFINITION OF A CHILD

A child is a person under the age of 18 (as defined in the United Nations convention on the Rights of a Child).

DEFINITION OF VULNERABLE ADULTS

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

This may include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

SAFEGUARDING OF VULNERABLE ADULTS AND CHILDREN POLICY AND CODE OF PRACTICE

RESPONSIBILITIES

All Employees and Subcontractors have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures.

We expect all Employees and Subcontractors to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

IMPLEMENTATION

The scope of this Safeguarding Policy is broad ranging and in practice, it will be implemented via a range of policies and procedures within the organisation. These include:

- Whistleblowing –ability to inform on other staff/ practices within the organisation
- Grievance and disciplinary procedures – to address breaches of procedures/ policies
- Health and Safety policy, including lone working procedures, mitigating risk to staff and clients
- Equal Opportunities policy– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory
- Confidentiality (or limited confidentiality policy) ensuring that service users are aware of your duty to disclose
- Staff induction
- Staff training

SAFE RECRUITMENT

JLA Limited ensures safe recruitment through the following processes:

- Providing the following safeguarding statement in recruitment adverts or application details; ‘Recruitment is done in line with safe recruitment practices.’
- Job or role descriptions for all roles involving contact with children and / or vulnerable adults will contain reference to safeguarding responsibilities.
- Shortlisting for a vacancy is based on a candidate’s skills, experience and potential when reviewed against the specific criteria needed in a position. To be considered, candidates apply via a formal application process consisting of CV, covering letter and application form.

SAFEGUARDING OF VULNERABLE ADULTS AND CHILDREN POLICY AND CODE OF PRACTICE

- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- DBS Disclosures will be requested for specific roles for all Employees and subcontractors working with children and vulnerable adults. Portable/ carry over DBS Disclosures from another employer will not be deemed to be sufficient.

DBS CHECKS

JLA Limited will ensure that their established staff and subcontractors and roles are regularly reviewed through:

- A 3 year rolling programme of re-checking DBS's is in place for holders of all identified posts.
- Existing Employees who transfer from a role which does not require a DBS Disclosure to one which involves contact with children / vulnerable adults will be subject to a DBS Disclosure request.

COMMUNICATIONS TRAINING AND SUPPORT FOR EMPLOYEES

JLA Limited commits resources for induction, training of all Employees and Subcontractors, effective communications and support mechanisms in relation to Safeguarding.

Induction will include (insert processes):

- Discussion of the Safeguarding Policy (and confirmation of understanding)
- Discussion of other relevant policies
- Ensure familiarity with reporting processes, the roles of Line Manager and Designated Senior Manager (and who acts in their absence)

TRAINING

All Employees and Subcontractors who, through their role, are in contact with children and /or vulnerable adults will have access to Induction Training and follow up Toolbox Talk Training on JLA's Safeguarding Policy and Code of Practice.

SAFEGUARDING OF VULNERABLE ADULTS AND CHILDREN POLICY AND CODE OF PRACTICE

COMMUNICATIONS AND DISCUSSION OF SAFEGUARDING ISSUES

Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice:

- Team meetings
- One to one meetings (formal or informal)
- Safety Alert messaging

MONITORING, EVALUATION AND REVIEW

This policy will be monitored, evaluated and reviewed annually by the HR Manager and the Group Compliance Manager.

DISSEMINATION OF THE POLICY

This policy is available on the JLA website and on request. Employees will have access to the full policy in Intranet.

SAFEGUARDING OF VULNERABLE ADULTS AND CHILDREN POLICY AND CODE OF PRACTICE

JLA Limited Code of Practice

JLA Limited expects all Employees and Subcontractors to protect the professional integrity of themselves and the organisation.

The following professional boundaries must be adhered to:

DO:

- observe this code at all times
- stay within the confines of the agreed site or work area
- work and be seen to work, in an open and transparent way
- obtain consent if access is required outside the site or work area
- use only the agreed access routes
- obtain consent if alternative access routes are required
- dress appropriately – shirts to be worn at all times (eg no bare chests)
- keep staff informed of where you are and what you are doing
- report any matters out of the ordinary or of concern, involving children/vulnerable adults, immediately to the site manager and your Line Manager
- be cautious and avoid personal contact with children/ vulnerable adults

DO NOT:

- initiate lengthy conversation with children/vulnerable adults
- use inappropriate, abusive or profane language
- respond to inappropriate behaviour/language
- give out addresses or mobile phone numbers to the children/vulnerable adults
- arrange to meet with children/vulnerable adults either inside or outside of the organisation site
- offer to buy items from children/vulnerable adults
- sell items to children/vulnerable adults
- bring alcohol on the site
- join in games with children/vulnerable adults
- share food or drinks with children/vulnerable adults (think of allergies and grooming implications)
- accept responsibility for any valuables on behalf of a client
- accept money as a gift/borrow money from or lend money to children/vulnerable adults
- accept gifts/rewards or hospitality from organisation as an inducement for either doing/not doing something in their official capacity

SAFEGUARDING OF VULNERABLE ADULTS AND CHILDREN POLICY AND CODE OF PRACTICE

NEVER be in contact with children/vulnerable adults without the Contracting Organisation's supervision;

- If you are spoken to by a child/vulnerable adult, be polite but do not engage in lengthy conversation.
- If spoken to by a child/vulnerable adult, avoid over familiar physical contact (the actions of a 'touchy feely' person could be easily misinterpreted or misconstrued).

REMEMBER your actions no matter how well intentioned, could be misinterpreted. Be mindful of the need to avoid placing yourself in vulnerable situations.

If the professional boundaries and/or policies are breached, this could result in disciplinary procedures being taken.

The principal pieces of legislation governing this policy are:

- Working together to safeguard Children 2010
- The Children Act 1989
- The Adoption and Children Act 2002:
- The Children act 2004
- Safeguarding Vulnerable Groups Act 2006
- Care Standards Act 2000
- Public Interest Disclosure Act 1998
- The Police Act – CRB 1997
- Mental Health Act 1983
- NHS and Community Care Act 1990
- Rehabilitation of Offenders Act 1974