

**Office of the Police and Crime Commissioner
for Wiltshire and Swindon**

Safeguarding Policy

Title:	OPCC Safeguarding Policy
Owner:	OPCC Director of Operations
Produced by:	N Parris, SPO Strategic Support Officer
Effective Date:	August 2025
Review Date:	August 2027
Version:	1.1
Protective marking:	Official

1. Introduction and purpose

1.1 The policy outlines the expectations and key standards all staff working for the Office of the Police and Crime Commissioner (OPCC) should be aware of, in relation to safeguarding children and vulnerable adults at risk of harm or abuse.

1.2 The OPCC commission services for a range of communities and recognise it is our responsibility to promote good practice in order children and vulnerable adults are safeguarded.

1.3 This policy will provide procedures and guidance to those who represent the OPCC. Outlining how the OPCC monitor the effectiveness of safeguarding practices & respond appropriately to any safeguarding allegations, concerns, incidents, and disclosures.

2. Scope

2.1 The scope of this policy applies to all aspects of our work and to everyone working or volunteering for the OPCC, including permanent, seconded, and temporary employees, contractors, self-employed contractors, and anyone working on behalf of or undertaking work for the OPCC.

2.3 Covering all situations where staff have contact with the public. This includes where staff are not directly in contact with children or vulnerable adults for work purposes, such as area boards, events, meetings, and correspondence.

2.4 This policy additionally aims to ensure any service the Police and Crime Commissioner (PCC) commissions from third parties or beneficiaries of PCC funding, show adherence with all safeguarding and child welfare legislation and Government guidance.

2.5 The OPCC expects all staff, contractors, and volunteers to co-operate fully with this and all OPCC policies as well as their own/host organisational policies and procedures where appropriate.

3. What is safeguarding

3.1 Key principles of safeguarding and promoting the welfare of children and vulnerable adults is provided below.

- Protecting children and vulnerable adults from maltreatment and harm.
- Preventing impairment of children and vulnerable adults' mental or physical health or development.
- Ensuring that children and vulnerable adults are growing up in circumstances consistent with the provision of safe and effective care.
- Ensuring adults and children with care and support needs are safe from abuse or neglect.
- Protecting vulnerable adults' rights to live independently and safely.
- Taking action to enable all children and vulnerable adults have the best outcome.
- People and organisations working together to prevent abuse or neglect.

The legislation and guidance documents used to outline these principles can be found in the legal framework section of this policy.

3.2 For the purposes of the policy the following definitions apply.

- A 'child' is defined by the Children Act 1989 as 'anyone under the age of 18'.
- The Department of Health defines a vulnerable adult as a person aged 18 or over who may need community care services because of a disability (mental or other), age, or illness.
- A person is also considered vulnerable if they are unable to look after themselves, protect themselves from harm or exploitation or are unable to report abuse for example due to frailty, drug or alcohol dependencies, a learning disability, etc.

4. What is Wellbeing

4.1 The Care act 2014 defines wellbeing as a" broad concept, and it is described as relating to the following areas in particular ¹:

- personal dignity (including treatment of the individual with respect)
- physical and mental health and emotional wellbeing
- protection from abuse and neglect
- control by the individual over day-to-day life (including over care and support provided and the way it is provided)
- participation in work, education, training, or recreation
- social and economic wellbeing
- domestic, family, and personal
- suitability of living accommodation
- the individual's contribution to society."

4.2 The children's act 2004 additionally includes:

- protection from harm and neglect
- education, training, and recreation
- the contribution made by them to society
- social and economic well-being

5. Situations where concerns may be raised

5.1 Situations include:

- A child or vulnerable adult may share information about something/someone that has upset or harmed them.
- Information may be shared which indicates someone believes a child or vulnerable adult has been or is being harmed or maltreated.
- Someone might share information provided by a child or vulnerable adult which indicates they have been or are being harmed or maltreated.

- A child or vulnerable adult might show signs of physical injury or injury for which a reasonable explanation can be ascertained.
- A child or vulnerable adults may display behaviours which suggest they are being abused.
- The behaviour of a support worker or carer indicates a child or vulnerable adult in their care is at risk of harm.
- A child or vulnerable adult demonstrates worrying behaviour towards other children or vulnerable adults.

5.2 Overarching circumstances where a child or vulnerable adult at risk of harm or maltreatment can be found listed below. (*The Hampshire policy provides and appendix with extensive circumstances – would this be useful for us?*)

Sexual harm e.g., online, intra or extra familial abuse or exploitation, etc.

Physical harm e.g., assaulted, wounded, etc.

Financial harm e.g., fraud, exploitation, theft, etc.

Neglect e.g., undernourished, intentionally left, etc.

Verbal abuse e.g., abusive language used, etc

Emotional abuse e.g., emotional neglect, inadequate provision causing isolation, etc.

Psychological harm e.g., control, coercion, etc.

Institutional abuse, e.g., inadequate care provisions, malpractice

6. Safeguarding Responsibilities

6.1 All OPCC staff

We recognise that all children and adults whatever their age, gender, disability, cultural or ethnic origin, colour, religion or belief, social status or sexual identity have a right to be treated with respect and protected from abuse.

It is the responsibility of everyone working for the OPCC to raise any concern they may have regarding the protection or safeguarding of a child or vulnerable adult. To support the achievement of this objective all OPCC staff and volunteers will:

- gain an understanding of the OPCC safeguarding policy.
- receive appropriate training material as part of their induction program, in a timely manner refreshed every two years.

6.2 The aim:

- To increase staff awareness and ensure appropriate action is taken in the event of incidents/concerns.
- To ensure safer recruitment preventing harm because of OPCC appointments.
- To ensure confidential management of all safeguarding concerns.
- To ensure robust safeguarding arrangements and risks mitigated.

- Procedures are in place to ensure staff understand the actions they need to take to safeguard vulnerable adults and children and are confident they can voice their concerns.

6.3 Line manager responsibilities

Line managers are responsible for the application of this Safeguarding Policy and the procedures arising from it (see *Annex C: Role of the designated safeguarding lead* in the DfE (2021) KCSIE (Keeping children safe in education)). They are required to:

- maintain relationships with local safeguarding partnerships and Wiltshire Police.
- investigate any allegations or concerns reported by children, adults or staff of safeguarding issues ensuring that confidentiality is maintained in all cases.
- in the event of a concern or allegation will ensure that the report is immediately (or within one-working day) brought to the attention of the OPCC Director of Operations (DoO) and agree the appropriate action to be taken.
- be responsible for co-ordinating safeguarding training for OPCC staff.

6.4 Director of Operations responsibilities

The OPCC Director of Operations has responsibility for the oversight of any safeguarding matters. This includes

- reviewing and maintaining this Safeguarding Policy.
- contacted as soon as practicable, (or within one-working day) with the details of any safeguarding allegation or concerns.
- act as 'case manager' to lead any investigation in dealing with any allegations or concerns reported and ensuring that confidentiality is maintained in all cases.
- co-ordinate training for OPCC staff.

As appropriate, liaise with any local safeguarding partnership or the Police regarding any allegation or concern. The Director of Operations must alert the OPCC CEO of any allegations / concerns then regularly update on progress.

6.5 Providers and Beneficiaries

Service providers will be required to have effective safeguarding policies and procedures in place. Where harm or maltreatment or risk of is identified there is a requirement to notify the OPCC. This is in addition to their local safeguarding reporting requirements.

Safeguarding incidents, the OPCC require notification for include:

- any adverse findings,
- warning notices,
- interventions,
- regulatory action from any regulator,

- any loss of consent, approval or licence that has a material adverse impact on the provider's ability to deliver the project/service.
- which may bring the provider and/or OPCC into disrepute.

6.6 OPCC commissioning and service delivery department will ensure safeguarding responsibilities are outlined in all OPCC awards and that a Prevent approach is promoted within the beneficiary organisation and when working with partners. The care act 2014 describes Prevent activity as:

- provide universal access to excellent quality information
- support safer neighbourhoods
- promote healthy and active lifestyles (for example. exercise classes)
- reduce loneliness or isolation (for example: befriending schemes or community activities such as the case study below)
- encourage early discussions in families or groups about potential changes in the future (for example: conversations about potential care arrangements or suitable accommodation should a family member become ill or disabled)

7. Procedures for reporting

7.1 When an allegation is made:

- Listen carefully to what is said and allow the person to talk without using leading questions. Use of open questions is advised e.g., what, where, when, etc.
- Explain at an appropriate moment you must share the information outlining the steps you are going to make.
- Reassure the person they have done the right thing telling you, and that you want them to be safe.
- If you believe the child or vulnerable adult is at immediate risk, then you should contact the police on 999.
- Where possible, seek the support of another colleague but ask if it is ok for an additional person to join the conversation.

7.2 What to do if you are told about abuse or have safeguarding concerns

Following every disclosure

- At the earliest opportunity, inform your DSL or DOFA, line manager of the safeguarding concerns (or within one-working day).
- You may want to take notes following the disclosure or incident in order information is captured fully. It is mandatory the information outlined in section 7.3. of this document be collated to the best of your ability. It must then be stored securely either in a locked cupboard or on a work password secured laptop - facilitated by the line manager or OPCC Director of Operations.

- If the allegation made to a member of staff concerns the line manager, the person receiving the allegation will immediately (or within one-working day) inform a member of the Executive Leadership Team and OPCC CEO must be informed.
- There may be instances where the provider was present during a disclosure in these instances. Full details of these interactions must be recorded and shared with the Wiltshire OPCC ELT member, then saved.
- Following a conversation with your line manager or SLT member a referral to the relevant child/adult safeguarding service will be made and/or police crime report submitted where appropriate.
- In instances where a referral is not made a Police intelligence report requirement must be fulfilled and report numbers recorded.
- A record of actions must be kept and provided to the OPCC Director of Operations for storage.

7.3 The below information should be collated and stored following a safeguarding incident or disclosure.

1. Who is completing this report?
2. Who has provided the information?
3. Are they the only person that knows this information?
4. Will sharing the information place them at risk? Please refer to the college of Policing guidance on Intel management – [link](#).

If the source will be placed at risk the director of operations may seek operational guidance from Wiltshire Police senior management team.

5. Date of the safeguarding concern(s), incident(s), and disclosure(s)?
6. Name, and if available address of the child or vulnerable adults at risk?
7. Name and role of the individual the allegation or concern relates.
8. Date and location of the incident.
9. Description of the safeguarding concern, incident, and disclosure.
10. Who the concern has been raised with?
11. Actions agreed to include agencies / partners/ person informed
12. Outcomes
13. Signatures for the OPCC member of staff and line manager or OPCC SMT member.

8. Best practice

8.1 Role modelling

- Staff should be an excellent role model.
- treat everyone respect and dignity.

- Be appropriately dressed and work in a respectful manner,
- recognise the boundaries between professional conduct and personal friendship.
- Prioritise the safety and well-being of children and adults at risk involved in any sessions or activities, ensuring that session content and/ or the activities are appropriate.
- Staff should never
 - make sexually suggestive comments to a young person/vulnerable adult, even in jest.
 - Use inappropriate language, this includes the spoken word or when writing in e mails or using social media.
 - Allow inappropriate or abusive conduct or behaviour.
 - Take part in inappropriate behaviour or contact, this can be physical, verbal, or sexual.
 - Allow a Children to drink alcohol or use drugs when working or attending events or interventions.
 - Staff should not socialize with or invite a volunteer to their home and never enter inappropriate relationships (i.e., relationships of an intensely personal or sexual nature), even though some volunteers are over the age of consent.

8.2 Gifts_

- Staff should not give or loan money to service users or volunteers.
- Gifts given to OPCC staff should fall within the Wiltshire police gifts and hospitality policy.
- Staff should not give presents or items to volunteers without their line manager approval, and these should be recorded on a register.

8.3 Touch

- Staff need to maintain a safe and appropriate distance, and work in an open environment.
- Avoid unnecessary physical contact.
- Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the person's consent has been given

8.4 Spending time alone

- If for any reason a member of staff is supervising on a one-to-one basis, this should ideally be done in a public area. Where not possible the door to the room should be kept open and another member of staff should be made aware as possible.
- If a staff member is required to take a volunteer in their vehicle the staff member should advise a colleague of the time they leave, where they are going, with who and what time they are due to finish that journey notifying them when complete
- If the volunteer is under 16 years of age, they should take a registered and pre-booked taxi with parental consent.

8.5 Personal values

Staff should work in an inclusive and respectful manner. Staff should refrain from discussing internal issues in front others, who may misconstrue information received or which may present the office, or PCC in a negative light. Equally staff should never show disrespect for a person's culture, religion, or personal choices.

8.6 Photography

- Photos taken with volunteers are for use on official channels only and consent is required before they can be used.
- If under 18 and unable to give consent, then only with parental agreement

8.7 social media

- Staff should only be 'friends' with volunteers on social networking sites via a designated and approved work account for business purposes.
- Any communication using this Facebook account should be kept public.
- All contact with young people using Facebook should be kept appropriate and not use abbreviations/language that could be misunderstood by a parent or guardian

8.8 Personal details

- Staff should not divulge details such as their home address, personal phone numbers and email addresses to volunteers.

9. Safeguarding impact

9.1 Recruitment

The OPCC recruitment is provided by Wiltshire Police. Employment will not commence until police vetting has been completed and staff will be re vetted periodically.

9.2 Commissioning leads

Commissioning and service delivery leads are required to

- Ensure all providers working with children / young people or vulnerable adults have a safeguarding policy and store a copy.
- Ensure the compulsory scenario questions have been completed and responses stored.
- Ensure all providers have a data handling policy and information sharing agreements that adhere to legislation such as the children's act 2004.
- Ensure they have current safeguarding leads details.

- Check and record staff and volunteers are made aware of the OPCC safeguarding policy and procedures? And that they are confident they know how to report safeguarding concerns, incidents, and disclosures?
- Store up to date details to show when and who has received staff / volunteer safeguarding induction and refresher training?

10. Legal framework

10.1 This policy aims to ensure any services the OPCC is compliant with the legal duty to safeguard and promote the welfare of all. In formulating this policy, we referred to the below legislation and guidance.

- The Care Act 2014,
- An easy read Care Act document has been produced by the department of health and can be found on this link - [ISL036 14 Mental Health Act Review Consultation \(councilfordisabledchildren.org.uk\)](https://www.councilfordisabledchildren.org.uk/ISL036_14_Mental_Health_Act_Review_Consultation)
- Care act amendments (2016)
- Children's Act 1989 and 2004
- Children and social work act 2017
- The Human Rights Act 1998
- Data Protection Act 1998
- Police Reform and Social Responsibility Act 2011 [s1(8)(h) PRSRA11 – The PCC to hold the Chief Constable to account in relation to the safeguarding of children and the promotion of child welfare that are imposed on the Chief Constable by sections 10 and 11 of the Children's Act 2004]
- Working Together to Safeguard Children 2018 – statutory guidance.
- Department for Education (2018). *Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children.*
- Department for Education (2021). *Keeping children safe in education (KCSIE)1,*
- Promoting the Health and Wellbeing of Looked After Children – statutory guidance
- Care and Support – statutory guidance (Chapter 14 – Safeguarding)
- The Mental Capacity Act 2005:

The Mental Capacity Act 2005 describes *capacity* or *mental capacity* as the ability to decide at a particular time and proposes five guiding principles. This means adults who finds themselves in vulnerable circumstances are assumed to have the *capacity* to make decisions. Informed consent from the individual concerned may need to be taken.

Mental capacity assessment will form part of needs assessments and should be available in supported living settings and care homes otherwise, from social workers. Lasting or Enduring Powers of Attorney and deputyships documentation may only be stored with family, advocates, or solicitors.

11. Data Protection and Information management

11.1 Please refer to the Wiltshire OPCC Privacy notice [here](#)

11.2 Please find the Wiltshire OPCC “Making Protected Disclosures” (whistleblowing Policy” policy [here](#).

11.3 Where OPCC staff are undertaking work with children, young people, or vulnerable adults, which means they will have to manage information that contains sensitive personal details. They must comply with the principles of the Data Protection Act 2018 and General Data Protection Regulations and relevant OPCC policies on collection, sharing and disposal of data

12. Policy management

12.1 The effectiveness of this policy will be reviewed every two years or following changes to legislation and government guidance.

12.2 Following changes in legislation and government guidance all staff working for the OPCC should be sign posted to the updated information by line managers.

13. Version control

Version number	Date	Author	Post	Reason for issue	Date agreed	Review schedule
1	March 2023	N Parris	SPO SSO	Initiate	02/03/2023	Biannual

Data Protection and information management

Please refer to the Wiltshire OPCC Privacy notice [here](#)

Please find the Wiltshire OPCC “Making Protected Disclosures” policy [here](#) . Please note, as from 25 May 2018 the legislation relating to processing personal information changed. Personal data is now governed by UK General Data Protection Regulations (UKGDPR) and the Data Protection Act 2018.

Where OPCC staff are undertaking work with personal data, they must:

- comply with the principles of the Data Protection Act 2018.
- have policies and procedures in place that secure against the inappropriate loss or destruction of personal information supplied via the grant application and/or grant agreement, including a secure means of transferring information in and out of organisations
- Ensure data is disposed of as prescribed within the Data Protection Act.
- Please refer to the Data Protection Policy for further guidance on how to handle personal data.

Policy Management

The effectiveness of this policy will be reviewed every year and/or following changes to legislation and government guidance.

Following changes in legislation and government guidance all staff working for the OPCC should be sign posted to the updated information by line managers.

Initial Equality Impact Assessment

Department: [Insert here]	Completed by: [Insert here]	Date of initial assessment: [Insert here]
Name of policy / process / area to be assessed:	[Insert here]	
Is this an existing or new function / policy, procedure, practice or decision?	[Insert here]	

<ul style="list-style-type: none"> Describe the aims, objectives or purpose of the function, policy or procedure? 	[Insert here]			
<p>The Equality Act 2010 requires public bodies to have due regard to the need to:</p> <ol style="list-style-type: none"> Eliminate unlawful discrimination, harassment and victimisation; Advance equality of opportunity between different groups; and Foster good relations between different groups 	<ul style="list-style-type: none"> Could the function / policy / procedure have any impact in terms of the aims set out in 1-3 of the Act on any of the protected characteristics. Please indicate positive (P), negative (N) or no impact (Nil). 	<ul style="list-style-type: none"> Briefly explain how the function / policy / procedure furthers or prevents the aims set out in 1 – 3. 	<ul style="list-style-type: none"> For any negative impact noted for any of the protected characteristics, can it be justified on the grounds of promoting equality or any other reason? If yes, please provide a brief explanation. 	
Protected Characteristics	Age			
	Disability			
	Gender Reassignment			
	Marriage / Civil Partnership			
	Race			
	Religion / Belief			
	Pregnancy / Maternity			
	Sexual Orientation			
Sex				
<ul style="list-style-type: none"> For any negative impact identified above, please list what actions will be taken to address the impact? 				
<ul style="list-style-type: none"> For any negative impact identified above, please note where and how frequently this impact and any associated 				

actions will be reviewed and monitored?	
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